

# 1. Don Given



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Town of Caledon  
6311 Old Church Road.  
Caledon, ON, L7C 1J6

via email: [opreview@caledon.ca](mailto:opreview@caledon.ca)

**Attention: Chair and Members of the Planning and Growth Management Committee**

**RE: Caledon Official Plan Review  
Royal Glen Eagle Investments Limited  
Glen Eagle Golf Club, 15731 Highway 50, Town of Caledon**

Malone Given Parsons Ltd. (**MGP**) is the planning consultant for Royal Glen Eagle Investments Limited (**Royal Glen Eagle**), the owner of Glen Eagle Golf Club (15731 Highway 50) located within the Town of Caledon. On behalf of Royal Glen Eagle, we have reviewed the Draft Caledon Official Plan (the “**Draft OP**”, or the “**Plan**”) and provide this letter with our comments on the key policy and mapping matters. We look forward to working with Staff to address our comments in the coming months. As we advance further discussions with Staff on the Draft OP, we reserve the right to provide additional comments.

## **Summary**

The Draft OP carries forward land use designations Policy Areas 1 through to 4, as well as Environmental Protection Zone designations within the Palgrave Estates Residential Community Secondary Plan (“PERC Secondary Plan”). These policies and designations were first introduced in 1979 following a Region of Peel study that considered the potential development of this area. Since 1979, there has been minimal updates to these policies and as such they have not been updated to reflect any of the latest Provincial Plans including the 2017 Oak Ridges Moraine Conservation Study, 2020 Provincial Policy Statement and 2020 Growth Plan.

**As such, we request that there only be one Policy Area designation for the remaining vacant lands within the PERC and that the maximum density provision be revised to reflect key overarching policy directions from the Province to provide more contemporary homes and discourages estate lots. At a minimum, the maximum density provision should be 36 units per 100 acres, however it is our opinion that it could be higher to reflect more contemporary standards and we are open to discussing this further with the Town. Furthermore, we also request that the Environmental Protection Zone designations be updated to reflect current conditions on the property.**

## PERC Land Use Designations

The policies of the in-force PERC estate residential land use designations are based on a study completed by the Region of Peel in 1979, predating the Provincial Policy Statement (2005, 2014 and 2020) and Growth Plan (2006, 2017 and 2020). As part of the Palgrave Estate Residential Area Policy Review completed by the Town of Caledon in 2019, these land use designations were reviewed. The Review stated that:

*“the PERC policies have detailed requirements for lot sizes and densities, and generally these policies are working well. There is no indication of a need to change required lot sizes or densities. Since the requirements of the Official Plan have been in place for many years, the lot sizes and densities have become a part of the character of the community.”*

These conclusions helped form the basis of continuing with the current land use designations that have generally remained in place since 1979. It is our opinion that there is a need to change the maximum lot sizes and densities given the vastly changed policy context. As such, these land use designations and their associated density restrictions should be reconsidered. While the PERC holds a unique status and the density requirements may have worked previously for existing communities, the policy context has changed significantly. Current planning practices have seen municipalities move away from permitting estate residential development (defined in the Town of Caledon OP as single-family dwellings on large lots) due to concerns relating to their appropriateness as development that efficiently uses infrastructure and is environmentally sensitive.

In summary, we do not see a need for multiple Policy Area designations for the remaining vacant land, as they were created under an older policy framework and are outdated. As such, only a single Policy Area should prevail for the vacant land, permitting, at the very minimum, a maximum density of 36 units per 100 acres however the maximum could be higher. Coupled with the Environmental Protection Zone designations, the appropriate protection for natural heritage features can be provided while allowing for estate residential at a density that is appropriate for this area, while providing more contemporary lots in alignment with Provincial policy direction. In our opinion, we don't see any material difference between these policy areas. While it is recognized that the Palgrave Estates Residential Community holds a unique status, the proposed land use designations should strike a balance between protecting the rural character, while moving closer to a more compact urban form that can be supported by appropriate servicing solutions and that can maintain the protection of the significant natural features. A revised Policy Area for vacant land that permits slightly more density represents the best balance between the intent of the Palgrave Estates Residential Community and Provincial policy.



**Environmental Protection Mapping**

The Draft OP also carries forward the environmental mapping from the in-force OP. Schedule I: Palgrave Estate Residential Community Environmental Zoning has three main environmental protection designations, Environmental Protection Zone 1, Environmental Protection Zone 2, and the Minimum Vegetation Protection Zone.

The environmental mapping on the property is based on an outdated aerial photo interpretation; however, Azimuth Environmental Consulting Inc. has recently completed detailed work to determine accurate site-specific conditions, as shown in Appendix 1. Several of the features identified by the Draft OP do not meet the test for significance under the Oak Ridges Moraine Conservation Plan and other identified features are fragmented by the golf course or have died and been removed. In addition, constraints have been added around a pond in the south-central part of the property due to turtle habitat. It is our opinion that the detailed mapping based on site-specific conditions should be used in the new OP's Schedule I as the constraint mapping for the property.

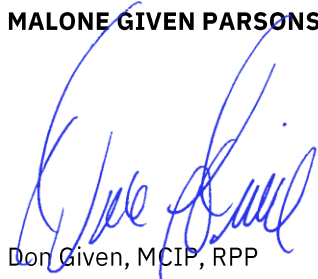
**Conclusion**

In conclusion we request that a revised Policy Area be applicable to the vacant land within the PERC, permitting at least a maximum density of 36 units per 100 acres to reflect more contemporary standards, and that Schedule I be updated according to site-specific work done by Azimuth Environmental Consulting. This will ensure that future development in the PERC will not pose an impact to the existing communities, maintaining the unique character of the Palgrave Estate Residential Community and protecting the environmental features on the property.

We look forward to further input and dialogue as part of the Caledon Official Plan Review process. We would be happy to sit down with you and staff to discuss our comments in detail.

Yours very truly,

**MALONE GIVEN PARSONS LTD.**

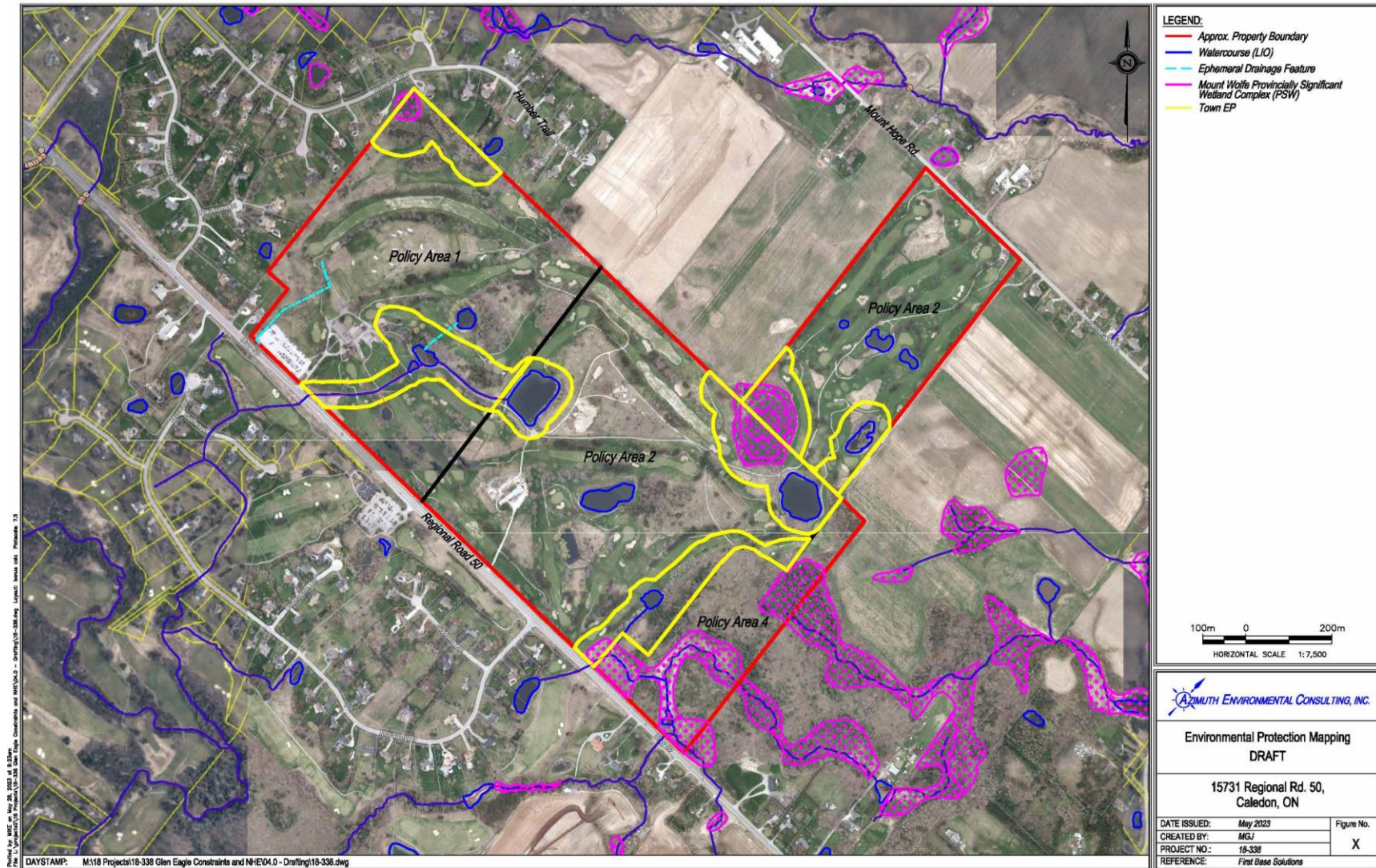


Don Given, MCIP, RPP  
Founding Partner  
[dgiven@mgp.ca](mailto:dgiven@mgp.ca)

cc Richard Pivnick, Royal Glen Eagle

Attch: Appendix 1: Proposed Environmental Constraints Map

## APPENDIX 1



## 2. Linda Van Leeuwen

Hi,

I would like to suggest that whenever possible as parks are built in residential areas (or natural areas are preserved as parkland) that there be at least a few parking spaces for cars next to the road. I have passed countless parks in different cities and towns that seem to be only available to the privileged few who happen to live within walking distance. Doesn't seem fair to me.

Now that I no longer live in Caledon, perhaps I should be removed from this mailing list.  
thank you,  
Linda van Leeuwen

### 3. Patricia Rosch

Thank you of sending the draft Strategic Plan 2023-2035. Involving and incorporating input from residents is key to preparing a successful plan. My husband (David Fowler) and I have been participating during the strategic planning process (i.e. completing surveys and attending meetings). Also, we have been attending other meetings associated with proposed pits and quarry. The one page summary of the strategic plan is well written and conveys the appropriate messaging and direction for the future of Caledon; however, it is evident that current and proposed activities focused on the aggregate industry do not align. In addition, I reviewed the 366 page Future Caledon Official Plan (June 2023 Draft) and it is currently incomplete as section 20 Mineral Aggregate Resources section starting at page 286 has not been included. The draft strategic plan and its vision is that Caledon “offers the best of rural and urban life for everyone”. Outlined below are some examples of current activities and future plans that highlight the differences in the strategic planning vision to actual events and eventual outcomes.

**Caledon has a safe and reliable transportation network** - The traffic in Caledon is **not safe** as evidenced by the numerous fatalities and injuries of motorists by trucks involved in the aggregate industry over the years. There has not been sufficient analysis of traffic patterns related to the CBM quarry. The analysis does not reflect accurate traffic patterns as it was conducted during COVID and eliminated key travel days. My husband sent correspondence re: traffic studies to Ms. Minichillo on May 31, 2023.

**Caledon’s villages and hamlets are vibrant and welcoming to businesses, residents and visitors** - As per the point above, traffic congestion in the quaint village of Caledon is not welcoming. This will be further exacerbated if the CBM quarry is approved. The businesses will pay the price as residents will not find it safe to visit local establishments (e.g. Dolce Family Ristorante, post office, and library).

**Caledon has a renowned trail network that connects communities** - The blasting at the proposed CBM quarry will have a negative impact on those using the trail system. The noise pollution and fly rock will not encourage visitors and hikers to come to Caledon. As per the Town’s website, "Caledon is dedicated to addressing and protecting the environment in our community" and prides itself on being the “Greenest Town in Ontario". Rehabilitated pits with lakes makes Caledon a “blue community” as highlighted in aerial photos.

**Caledon attracts and supports a local economy that aligns with our vision for the community** - The high proportion of aggregate operations is limiting the focus on other viable business operations in Caledon. Aggregate businesses generate increased noise, air and water pollution which negatively impact people, wildlife and the environment. Should the CBM quarry applications be approved as part of the amended Official Plan, the negative impacts will be amplified tremendously.

I completed my undergraduate degree in Urban and Regional Planning (University of Waterloo) and have a Master of Science in Rural Planning and Development (University of Guelph). I pursued a business career and was President of a large multinational data processing company. I understand the importance of a cost benefit analysis for any project in order to result in a win - win situation. Now is the time that the Caledon must change its current philosophy about how it addresses and manages its aggregate resources and the commercial enterprises benefiting financially. The aggregate industry is having a tremendous negative trickle down effect on all aspects of your draft Strategic Plan and Official Plan and more importantly, the residents/tax payers of Caledon. Caledon is aggregate rich but the companies benefitting are not contributing appropriately (i.e. reference during the June 20 meeting of \$362K collected from aggregate firms). A suggestion is to look at other communities and devise a new financial model and tax structure to ensure that Caledon and its residents receive appropriate compensation to offset the impact on the infrastructure (i.e. roads, water) and ensure companies are **contributing to support and grow our local economy**. This would be the beginning of a true cost benefit analysis for all parties concerns.

### 3. Patricia Rosch

Another negative impact of the aggregate industry and proposed quarry are on property values for the residents of Caledon. I previously submitted correspondence during the James Dick proposal with Blueand Farms for the McCormick Pit and requested a cost benefit analysis. This information was never supplied. As per the Ontario Ministry of Environment D Series Guidelines Compatibility between Industrial Facilities and Sensitive Land Uses - Environmental Warnings for Sensitive Land Uses "When the new development is sensitive, the Ministry recommends that a warning of anticipated nuisance effects be included in any offers of purchase and sale". By recommending such warnings the Ministry of Environment acknowledges that Class 3 industrial operations diminish the value of properties in the proximity to the aggregate operation. The beneficiaries of aggregate operations take no responsibility for the serious adverse economic impacts on property owners. Similar property value concerns were raised by other residents related to the proposed quarry at the June 20, 2023 council meeting for the proposed amendment of the Official Plan. The minuscule fee revenue that Caledon collects related to aggregate operations per annum does not support the road and other enhancements necessary to support the corporations financially benefitting from Caledon's resource base. At present, such losses accrue to the neighbours of these developments and there should be appropriate compensation to those impacted residents.

The proposed quarry is in direct contravention to the draft Strategic Plan and numerous objectives of the draft Official Plan. The presentation by CBM on June 20, 2023 was from their perspective and only focused on their business objectives to make revenue and profit selling Caledon's resources. There was absolutely no concern from the CBM representatives for the residents that would be impacted if the operation was approved. There was a lack of transparency in the CBM presentation and in their responses. The numbers quoted related to number of blasts and number of tons removed varied and they would not be specific. Who will pay for dry wells, ruined septic systems, cracked foundations, broken windows - both at houses and for vehicles that get chipped or broken windshields? Please stop and ask pertinent questions and get accurate answers from CBM to ensure that Caledon is executing on the strategic plan and related other plans (i.e. Official Plan). A question that was raised and should be answered is "what are the aggregate reserves for all aggregate operators in Ontario?" We should be looking for new ways of addressing aggregate requirements, not just maintain the status quo of opening another new pit and/or quarry for the benefit of another corporation. There are new technologies available such as using recycled aluminium for concrete production. Caledon has the opportunity to be transformative and address sustainability by responsibly assessing and managing the aggregate resources.

The questions posed by Mayor Groves and other councillors to the CBM representatives at the June 20th meeting were very thoughtful. Mayor Groves asked about aggregate recycling and the gentleman from CBM only spoke about truck volumes. The gentleman did not address the pollutants in the cement to be recycled that will be brought into Caledon as a dumping ground. The recycled cement pollutants will be airborne and also impact the watersheds in Caledon and other parts of Ontario dependent on the connected waterways.

We all acknowledge that CBM has spent some money to buy some excellent quality agricultural land to convert to a quarry without full disclosure and appropriate approvals. That was a business risk that CBM took with full knowledge of the official plan. With respect to the peer reviews of the CBM materials, it will be critical that due diligence is completed and all questions are answered to balance Caledon's policies and plans with fair and appropriate business interests. I question the results of the studies produced by CBM and this was magnified by their lack of transparency in their verbal responses. If the CBM presentation and proposal were presented in the private sector prior to making a "go-no go" decision, it would be turned down because of lack of sufficient and accurate data and commitment to the other parties (in this case - Caledon Council and residents). It is now going to take substantial time to complete peer reviews because the initial documentation was so poorly prepared. Council should not bend to a Brazilian conglomerate as the financial and health impacts on Caledon residents and others in Ontario impacted by water, noise and air pollution are substantially higher - in perpetuity.

### 3. Patricia Rosch

The Town of Caledon Strategic Plan 2023-2035 has used a collaborative approach to set a strong direction for the future growth of Caledon. I completed the online poll and have indicated that I do not support the Strategic Plan at the present time as I am evaluating based on lack of detail related to aggregate resources in the Strategic Plan and the draft Official Plan (section 2.3.5 is blank). It is critical that the policies and objectives within the draft Strategic Plan and Future of Caledon Official Plan truly align with decisions and eventual outcomes impacting Caledon today and in the future.

Thank you for the opportunity to participate and should you have any questions or require clarification, please feel free to reach out at [REDACTED]

Regards,

Patricia Rosch



#### 4. Kim Bayley

Thank you for sharing all of the documents, it will take a considerable amount of time to review the documents in detail as you can imagine.

In looking very briefly at the summary of the updates and the video shared, I do have one question and some comments on the statements within the video.

##### Question:

Phase 2 references Truck Parking/Goods movement policies where is the detail within the documents provided?

I just want to understand what areas we are promoting/approving the parking of trucks? What rules and approvals will be in place to ensure that the truck parking does not negatively impact on the environment, roads, neighbouring properties etc. Also what will be the tax designation class that is put in place for these properties, will it be commercial?

##### Comments on Video:

"Rooted in Agriculture, Caledon has grown to respect the land it calls home....." You only have to have attended any of the Planning and Development meetings in the past 2-3 years and listen to the ongoing tracking that Kathleen Wilson has presented several times now about all of the MZOs that have been approved that are rezoning Prime Agricultural Land for commercial (mostly warehousing) uses throughout Caledon. The statement in the video is FALSE. Caledon no longer has respect for its land and that "we love the green space, farms and natural gems." The commercial rezoning along with the aggregate companies are quickly destroying what agriculture and farms we have left. You only have to drive around Caledon to see that "farmers" have left.

"More affordable housing options, so our kids can own a home in Caledon....". Again another statement that is incorrect, even with the development of more "affordable homes", our kids can not afford them as the jobs that are planned to be added in Caledon are all in warehousing/trucking and would not provide enough income to be able to live and work here. Townhouses in Caledon are at minimum \$800K and even with a good down payment need an income of over \$120K per year to support them. Most young adults don't make high salaries and are debt ridden coming out of university.

"A place that addresses climate change in everything we do" Again if you go back to my first statement for every tree that is removed to build a warehouse or to build new houses there is a huge negative impact on climate change. **One large tree can provide a day's oxygen for up to four people.** You need about 500 full-sized trees to absorb the carbon dioxide produced by a typical car driven 20,000 km/year. Additionally in the Climate Change section there are references to electric vehicles but a bigger impact would be to reduce vehicle idling which in the plan we will have hundreds of trucks idling and moving throughout a vast warehousing/trucking network. No amount of chargers and conversions to all electric vehicles will offset this impact.

#### 4. Kim Bayley

I look forward to more discussion.  
Kim Bayley



Ms. Minichillo, the attached draft policies proposed by the City of Barrie for its updated Official Plan with respect to the long-term protection of the environment and “Water Resources” should be taken into account in updating Caledon’s Official Plan. Here is a brief excerpt from the City of Barrie draft policies:

### **THE ENVIRONMENT**

It is recognized that one of the competitive advantages that the City of Barrie has in its role as a regional centre within the Greater Golden Horseshoe, is the lifestyle afforded by the City’s high quality natural environment and amenities including Kempenfelt Bay and Lake Simcoe. The importance of the conservation and preservation of the natural environment, including forested areas, wetlands, valley and stream corridors and waterfront linkages, and air *quality*, and water resources is recognized as a major consideration in maintaining, and enhancing where possible, the health of the natural ecosystem and human health.  
**(Mod C (e))**

Municipal government has an important role to play in fostering an environmental consciousness and an attitude of responsible stewardship of the City's natural environment. This role can complement the mandate and efforts of Fisheries and Oceans Canada, the Ministry of the Environment, the Ministry of Natural Resources, the Nottawasaga Valley Conservation Authority and the Lake Simcoe Region Conservation Authority.

In implementing the goals and policies of this Plan, the City will strive for "sustainable development", defined as development that does not jeopardize opportunities for future generations. Development which is sensitive to the environment can be achieved through sound land use planning and transportation policies; through the development of energy and resource conservation programs; through the integration of waste management programs and the application of environmentally sensitive engineering, such as Best Management Practices.

### **WATER RESOURCES**

The City of Barrie relies predominantly on groundwater sourced from a deep aquifer through a number of active wells, and from a surface water

treatment plant which takes water from Kempenfelt Bay (Lake Simcoe) for its municipal drinking water.

Long term protection of this valuable resource from overuse, contamination and from land uses [e.g. Pits and Quarries] that could threaten or hinder existing and future drinking water supply is essential to maintaining human health, economic prosperity and quality of life."  
[underscoring added]

Respectfully submitted,  
Tony Sevelka, Caledon Resident and Concerned Citizen

## Table of Contents

Page

Table of  
Contents

### Schedules

A	Land Use
B	Planning Areas
C	Defined Policy Areas
D	Roads Plan
E	Road Widening Plan
F	Watercourses
G	<del>Wells and Well Head Protection Areas</del> <u>Drinking Water Vulnerable Areas</u>
H	Natural Heritage Resources
I	Intensification Areas
J	Lake Simcoe Watershed

## SECTION 1.0: INTRODUCTION

## 5. Tony Sevelka

**THE WATERFRONT**

The City's waterfront, with its parks, trails, facilities and events is recognized as a major contributor to the lifestyle enjoyed by its citizens, as a central hub and meeting place, as an asset to the historic downtown area, and as an attraction for tourists as part of the City's economic base.

Public ownership and control over land use and activities on the City's waterfront properties is a cornerstone of City policy. The City

recognizes the value of public parkland as a community asset. Use of these lands for *uses* other than open space and recreational uses will be considered in the context of providing both public accessibility and benefit. **(Mod C (d))**

**THE CITY CENTRE**

The City Centre Planning Area of the City consists of the traditional central business district in the form of the historic downtown as well as some of the City's older residential areas. This Plan extends special attention to the City Centre because of its role as a major asset for the community. The City recognizes the downtown as a strategic priority and has completed both a revitalization plan and a community improvement plan under the *Planning Act* as a means of focusing community interest and investment. City, private and public/private partnerships are intended to encourage the land use, infrastructure and linkages with the waterfront necessary to realize the role and potential of the City Centre to a growing and more geographically extended population.

This can be achieved by ensuring that arterial roads and corridors leading to the waterfront support multiple modes of transportation, such as walking and cycling.

**THE ENVIRONMENT**

It is recognized that one of the competitive advantages that the City of Barrie has in its role as a regional centre within the Greater Golden Horseshoe, is the lifestyle afforded by the City's high quality natural environment and amenities including Kempenfelt Bay and Lake Simcoe. The importance of the conservation and preservation of the natural environment, including forested areas, wetlands, valley and stream corridors and waterfront linkages, and air quality, and water resources is recognized as a major consideration in maintaining, and enhancing where possible, the health of the natural ecosystem and human health. **(Mod C (e))**

Municipal government has an important role to play in fostering an environmental consciousness and an attitude of responsible stewardship of the City's natural environment. This role can complement the mandate and efforts of Fisheries and Oceans Canada, the Ministry of the Environment, the Ministry of Natural Resources, the Nottawasaga Valley Conservation Authority and the Lake Simcoe Region Conservation Authority.

In implementing the goals and policies of this Plan, the City will strive for "sustainable development", defined as development that does not jeopardize opportunities for future generations. Development which is sensitive to the environment can be achieved through sound land use planning and transportation policies; through the development of energy and resource conservation programs; through the integration of waste management programs and the application of environmentally sensitive engineering, such as Best Management Practices.

Section 2.0  
Community  
Context

### **WATER RESOURCES**

The City of Barrie relies predominantly on groundwater sourced from a deep aquifer through a number of active wells, and from a surface water treatment plant which takes water from Kempenfelt Bay (Lake Simcoe) for its municipal drinking water.

Long term protection of this valuable resource from overuse, contamination and from land uses that could threaten or hinder existing and future drinking water supply is essential to maintaining human health, economic prosperity and quality of life."

### 2.3 ASSUMPTIONS

In addition to the Background discussed in Section 2.1, assumptions about future trends and factors influencing Barrie have been used as the basis for the goals and policies of this Official Plan. Factors may arise in the future, including changes to municipal boundaries and the Provincial allocation of population and employment, that materially alter the basis of the assumptions and policies which may have to be revised to reflect current situations. This Official Plan is based on the following assumptions:

- (a) The City will continue to function as a strong *centre for growth* within the provincial settlement pattern serving as the area's leading municipality in terms of population, employment and the delivery of services. **(Mod C (f))**
- (b) The population, household, and employment growth forecasts for Barrie will continue to be substantially above that of the provincial average. However, it is anticipated that this rate of growth will decline as the City approaches build out capacity.
- (c) Over the long term, the average age of the population will increase which will entail changes regarding the supply and demand for housing accommodation, social services, and health care.
- (d) *There will be a growing need to provide residential densities which are higher, more cost effective, energy efficient, and more environmentally sustainable than previous development in the City.* It is expected that throughout the planning period, Barrie's new housing stock will continue to include a *large* percentage of single detached units *and a growing percentage of multiple family development* at medium and high densities in order to provide a complete range of housing options for the City's residents. Intensification represents an essential component of the City's growth management strategy to minimize the infrastructure requirements of new development and to utilize existing services including transit, schools, and open space. **(Mod C (g))**
- (e) There will be improved opportunities for efficiencies in public transit with the increased residential densities along or in close proximity to transit routes, *transit stations* and the GO Transit line. **(Mod C (h))**
- (f) Emphasis will be placed on developing active transportation systems (pedestrian, cycling, etc.) that facilitate movement throughout the City and reduce dependence on the automobile, thus enhancing health and air quality.
- (g) Intensification, *mixed land uses* and increased density represent an opportunity to develop complete communities, as intended by the *Growth Plan*, and in order to ensure success, urban design will be a key consideration in all developments. **(Mod C (i))**



- (h) The service/tourism sector of the economy will grow faster than the manufacturing sector and offer more activities of a specialized nature, serving the growing population of both the City and the regional trade area which the City anchors.
- (i) There will be an increased focus on maintaining and attracting knowledge based and technologically skilled jobs characterized by the manufacturing, office and financial sectors, as part of the City's strategic priorities and associated economic development strategy.
- (j) Increased self sufficiency will be achieved in employment as more people will both live and work in the City.
- (k) The cultural heritage and diversity of the arts community of the City will be a significant component of the City's growth and evolution.
- (l) *The City will implement sustainable development policies and practices to protect Lake Simcoe in keeping with the LSPP. (Mod C (j))*
- (m) The long term protection of drinking water shall take priority where conflicting considerations apply.

## SECTION 3.0: GENERAL POLICIES

## 5. Tony Sevelka

### 3.5 NATURAL HERITAGE, *NATURAL HAZARDS* AND RESOURCES (Mod D (cc))

#### 3.5.1 GOALS

#### 3.5.2 POLICIES

##### 3.5.2.1 GENERAL POLICIES

##### 3.5.2.2 LAND MANAGEMENT

##### 3.5.2.3 WATER RESOURCE MANAGEMENT

##### 3.5.2.3.1 FLOOD PLAIN MANAGEMENT, *EROSION, HAZARDOUS SITES* AND FILL CONTROL (Mod D (ee))

##### 3.5.2.3.2 SURFACE WATER PROTECTION

- (a) The City will work in partnership with adjacent municipalities and the Conservation Authorities, provincial ministries, the Health Unit and other partners to develop practices that maintain and improve the quality and quantity of lakes and watercourses, and to protect headwater areas from land uses that have the potential to contaminate downstream water systems.
- (b) The City will co-operate with the Conservation Authorities and adjacent municipalities in identifying and mapping surface water features, groundwater features, hydrologic functions and natural heritage features and areas which are necessary for the ecological and hydrological integrity of the watershed. These features will be incorporated into the Plan as Schedules by amendment.
- (c) The natural quality and hydrologic characteristics of watercourses and lakes, including aquatic habitat, base flow, water quality, temperature, storage levels or capacity are to be maintained, and no development shall be permitted that has the potential to create a negative impact on any of the watercourses and lakes.
- (d) Development and site alteration shall be restricted in or near *lakes and watercourses* such that these features and their related hydrologic functions will be protected, improved or restored. *In general, development and site alteration shall be setback a minimum 30 metres from lakes and watercourses.* (Mod D (gg))
- (e) Mitigation measures or alternative development approaches may be required in order to protect, improve or restore sensitive surface water features such that these features and their related hydrologic functions will be protected, improved or restored.

**3.5.2.3.3 GROUNDWATER PROTECTION**

- (a) Schedule G identifies areas where the variety of permitted land uses may be limited in order to protect groundwater resources.
- (b) The City will work in partnership with the County of Simcoe, adjacent municipalities, the Conservation Authorities, provincial ministries, the Health Unit and other partners to protect, maintain and enhance groundwater and surface waters to:
  - i) minimize *and prevent* the potential negative impacts of land use practices or development on groundwater; and **(Mod D (hh))**
  - ii) restrict or limit development and land use *on lands containing wells* and well head protection areas identified on Schedule G. **(Mod D (ii))**
- (c) The City may require a risk assessment and/or hydrogeology analysis where there is potential for a proposed development to pose significant risk to a vulnerable aquifer located in one of the well head protection areas identified on Schedule G.
- (d) The risk assessment which shall be completed to the satisfaction of the Ministry of the Environment and in consultation with the respective Conservation Authorities, where appropriate, and the City shall address the following:
  - i) existing groundwater quality and local hydrogeological setting;
  - ii) nature of any predicted adverse impacts;
  - iii) the ability to eliminate or effectively mitigate these impacts; and
  - iv) the proposed mitigation measures.

**3.5.2.3.4 GROUNDWATER RECHARGE AREAS**

- (a) *A significant groundwater recharge area is an area identified,*
  - i) *as a significant groundwater recharge area by any public body for the purposes of implementing the PPS;*
  - ii) *as a significant groundwater recharge area in the assessment report required under the Clean Water Act, 2006 for the Lake Simcoe and Couchiching/Black River Source Water Protection Area; or*
  - iii) *by the Lake Simcoe Region Conservation Authority in partnership with Ministry of Environment and Ministry of Natural Resources as an ecologically significant groundwater recharge*

*area in accordance with the guidelines developed by these agencies.*

- (b) *Once identified, the City shall incorporate significant groundwater recharge areas into the Plan together with policies to protect and improve or restore the quality and quantity of groundwater in these areas and the function of the recharge areas.*
- (c) *Urban settlement area expansions should avoid significant groundwater recharge areas.*
- (d) *An application for major development within a significant groundwater recharge area shall be accompanied by an environmental impact study that demonstrates that the quality of groundwater in these areas and the function of the recharge areas will be protected, improved or restored. (Mod D (jj))*

Section 3.0  
General Policies

(e) Significant Groundwater recharge areas shall be protected from incompatible development or site alteration that may reduce the recharge of an aquifer.

(f) New development or site alteration shall only be permitted in SGRAs where the activity would not constitute a significant drinking water threat and where it can be demonstrated through a hydrological or hydrogeological study that the existing water balance will be maintained (i.e. there will be no reduction in recharge).

#### **3.5.2.3.5 DRINKING WATER PROTECTION**

- (a) The City will work in partnership with the County of Simcoe, adjacent municipalities, the Conservation Authorities, the Source Protection Authorities within the South Georgian Bay Lake Simcoe Source Protection Region, provincial ministries, the Health Unit and other partners to encourage and promote water conservation measures and build awareness of best practices through education and outreach programs.
- (b) Schedule G Drinking Water Vulnerable Areas identifies areas of vulnerability for drinking water sources, including Wellhead Protection Areas (WHPAs), Intake Protection Zones (IPZs), and Issues Contributing Areas (ICAs). Schedule G is intended to be used as an overlay to Schedule A: Land Use where the following policies would apply:
  - i) Development, site alteration and proposed land uses that involve the storage or manufacture of pathogens, chemicals or dense aqueous phase liquids shall be prohibited in vulnerable areas identified on schedule G, where they would constitute a significant drinking water threat.

- ii) Proposed expansion, alteration or redevelopment of existing uses in an area identified in the Assessment Report as areas where an activity is or would be a significant drinking water threat, may be permitted if the Risk Management Official (RMO) is satisfied that a Risk Management Plan will reduce by a reasonable amount the potential for the activity to adversely affect the raw water supply.
- iii) A Source Water Impact Assessment and Mitigation Plan shall be required where it is necessary to determine whether a proposed development or use proposed within a vulnerable area identified on Schedule G, would constitute a significant drinking water threat.(Refer to terms of reference for Source Impact Assessment and Mitigation Plan)
- iv) New private wells, vertical geothermal heating systems or buildings and structures which entail drilling or construction methods that create potential pathways to groundwater resources in vulnerable areas identified on Schedule G, shall be required to demonstrate that they would not pose a significant threat to existing drinking water sources.
- v) Where there is a risk of establishing a transport pathway to drinking water sources, a development proposal or planning application shall not proceed until the Risk Management Official is satisfied that appropriate measures are taken to prevent significant threats to drinking water sources.
- vi) The City shall amend the Comprehensive Zoning by-law to prohibit, restrict or conditionally permit land uses that involve threat activities in vulnerable areas where they would constitute a significant threat.

#### **3.5.2.3.2 Application and Development Process:**

- (a) Development, site alteration, proposed land uses or any proposal requiring land use planning review and comment, located within vulnerable areas identified on Schedule G shall include a Drinking Water Information Form prior to acceptance of the application as a complete application.
- (b) A Source Water Impact Assessment and Mitigation Plan shall be required where it is necessary to determine whether development, site alteration or proposed land uses that involve the storage or manufacture of pathogens, chemicals or dense non-aqueous phase liquids will constitute a significant drinking water threat.

- (c) A Risk Management Measures Plan may be required as a condition of approval where the redevelopment, development or land use proposal involves activities that can be managed to address the potential threat.
- (d) The City shall seek opportunities through conditions of planning applications, development plans, community improvement plans or other means to acquire lands, register easements or apply other methods to control activities within lands identified as a WHPA-A on Schedule G of this Official Plan. (This includes lands within 100 m radius of municipal wells)
- (e) All industrial, commercial, institutional, open space and high density residential areas located within vulnerable areas identified on Schedule G shall be subject to Site Plan Control.

#### **3.5.2.3.3 DESIGN GUIDELINES IN THE ISSUES CONTRIBUTING AREA:**

- (a) The design of parking lots, roadways, sidewalks and walkways shall minimize the need for road salt application (e.g. eliminate ponding) and implementation of salt management measures shall be encouraged.
- (b) Expansions or retrofitting of existing storm water management facilities and wastewater treatment facilities may be permitted in vulnerable areas where such expansion or improvement will result in a reduction or elimination of an issue or threat.

#### **3.5.2.3.4 NEW MUNICIPAL WELLS**

- (a) The location and establishment of new municipal drinking water wells shall be cognizant of the potential impact of existing uses and permitted uses in designations within the wellhead protection areas of the proposed well. Designations that permit uses that involve threat activities that may constitute a significant drinking water threat shall be avoided. Where no alternative is feasible, an amendment to the Official Plan will be required to designate lands within the wellhead protection areas such that the permitted uses would not constitute a potential drinking water threat.
- (b) In cases where a new municipal well is proposed, the City shall endeavour to acquire land or easements over land within a 100m radius of any new municipal well, or maintain control over the activities through land use restrictions.

#### **3.5.2.4 NATURAL HERITAGE RESOURCES (OPA 14, By-law 2013-059)**



### 3.6 COMMUNITY IMPROVEMENT PLANNING

#### 3.6.1 GOALS

##### 3.6.2.4 DESIGNATION OF COMMUNITY IMPROVEMENT PROJECT AREAS

Section 3.0  
General Policies

- (a) Community Improvement Plans will be implemented through passage of a by-law designating a Community Improvement Project Area and through preparation of Community Improvement Plans pursuant to the *Planning Act*.
- (b) The designation of Community Improvement Project Areas will be based on one or more of the following characteristics:
  - i) Inadequate or deficient municipal infrastructure and services including facilities such as parks, arenas, and community centres.
  - ii) Old, deteriorated or neglected buildings and properties that require upgrading, rehabilitation or replacement.
  - iii) The presence of incompatible or conflicting land uses.
  - iv) Deficient streetscapes in terms of poor roads, curbs, sidewalk, boulevards, tree planting, landscaping, street furniture, and street lighting.
  - v) Inadequate flood protection.
  - vi) The presence of buildings of cultural heritage significance.
  - vii) The presence of inherent vistas and visual amenities such as the waterfront which would benefit from protection and enhancement and which provide opportunities for tourism, leisure and recreation.
  - viii) Lands with potential for enhancement of natural heritage features or functions through environmental rehabilitation, restoration or naturalization.
  - ix) Inadequate mix of housing types.
  - x) The presence of soil or water contamination because of chemicals or other pollutants.
  - xi) Deteriorated or insufficient parking facilities.
  - xii) Poor overall visual appearance including streetscape, and urban design.
  - xiii) Transportation or transit deficiencies including inaccessible or deteriorated sidewalks, walkways, bike paths/lanes and trails.

- xiv) Poor, inadequate or unsafe interfaces between different transportation modes including motorist, vehicular, cyclist, pedestrian and public transit on streets and roads.
- xv) *Consideration of opportunities for improvements to increase energy efficiency, reduce water demand and overall sustainability.*  
**(Mod D (oo))**
- xvi) Any other environmental, social or community economic development reasons.
- xvii) Identification of a potential existing condition, issue or threat to drinking water.

**5.0 SERVICING AND TRANSPORTATION****5.1 SERVICING****5.1.1 GOALS****5.1.2 POLICIES****5.1.2.1 GENERAL POLICIES**

- (a) Public Utilities, including sanitary sewage facilities, stormwater management facilities, municipal water, the electrical power utility, the TransCanada Pipeline, telecommunications/communications *infrastructure*, or any other utilities shall be permitted within any land use designation of this Plan. **(Mod F (b))** Wherever possible, public utilities/facilities shall not be located on lands designated Environmental Protection or Open Space. Where the location of public utilities on lands designated Environmental Protection or Open Space is efficient, cost effective and in the public interest, an EIS shall be undertaken in accordance with the policies of Section 6 of this Plan.
- (b) New sewage treatment facilities, waste disposal sites, wastewater treatment or stormwater management facilities are located outside of vulnerable areas where they would be a significant drinking water threat.
- (~~cb~~) Expansions or retrofitting of existing facilities would not increase the risk to drinking water.
- (~~d~~) If the availability of any urban service is to be restricted, industrial/commercial/institutional development shall take precedence over other land uses to receive the available capacity.
- (~~ee~~) The City will encourage, and work in co-operation with the County and neighbouring municipalities for overall co-ordination of the transportation system including any active transportation and public transit initiatives.
- (~~fd~~) Development occurring adjacent to the TransCanada Pipeline easement shall be required to maintain an appropriate setback for all permanent structures and excavations. Specific standards will be included in the City's Zoning By-law.
- (~~ge~~) *Where municipal sewage services and municipal water services are not provided, no new development shall be permitted on individual on-site sewage services with the exception of a limited amount of residential infill where infill is defined by 6.2.1.1 of this Plan.* Expansions or additions to existing development on individual on-site sewage services may be permitted only when they do not exceed the capacity of

Section 5.0  
Servicing and  
Transportation

the existing system, and where they do not constitute a significant drinking water threat. **(Mod F (c))**

- (hf) The provision and expansion of services, *taking into account the utilization of existing services, whenever feasible*, shall be co-ordinated with planned future development to ensure that growth and redevelopment take place in an efficient, cost effective and environmentally sound manner. **(Mod F (d))**
- (ig) The provision and expansion of services shall be planned to minimize conflicts with other land uses through their location, design and buffering.
- (jh) Development in the City shall be dependent upon the availability of sanitary sewage capacity in the City's Water Pollution Control Centre. Flows to this facility shall be monitored as new development proceeds *and shall comply with provincial regulations.* **(Mod F (e))**
- (ki) Draft approval of a plan of subdivision does not in itself constitute a commitment by the City, its electrical power utility, or the Ministry of the Environment to provide access to the City's Water Pollution Control Centre or the Water Supply Plant. Draft plans may proceed to registration provided there is sufficient plant capacity and capability to serve the development. Plant capacity will be allocated for new development on a priority basis at the time of payment of development charges. The provisions of Section 3 will be used to assist in determining the priority of individual development proposals.
- (kj) Expansions to the existing serviced area shall progress logically from the extremities of the existing system outwards to the City boundaries subject to the provisions of Section 5.1.2.1 (e) and (f) above.
- (lk) All sanitary sewers should be designed to accommodate sewage flows from the ultimate development expected in the contributory area.
- (ml) No stormwater from any source including roof or foundation drains of buildings or parking lots shall be connected to the sanitary sewer system. Capture and reuse of stormwater will be encouraged. Separation of any stormwater systems attached to municipal sanitary sewer systems shall be a requirement of redevelopment.
- (nm) The design of services shall comply with the approved standards of the City and its electrical power utility as revised from time to time.
- (oa) The City will encourage the development of TransCanada's right-of-way for passive parkland or open space purposes subject to TransCanada's easement rights.

## 5.2 WATER AND WASTEWATER

### 5.2.1 GOALS

- (a) *To work cooperatively with the Conservation Authorities to prepare watershed plans to guide development decisions and water and wastewater servicing decisions. (Mod F (f)(i))*
- (b) *To ensure long term protection of drinking water resources.*
- ~~(b)~~(c) *To maintain a high standard of water quality in Kempenfelt Bay and in the numerous watercourses within the City.*
- ~~(c)~~(d) *To provide safe, sanitary, environmentally sound and efficient methods of water treatment and distribution and sanitary sewage collection and treatment for residents, businesses, institutions and industries.*
- ~~(d)~~(e) *To encourage measures which promote the *efficient and sustainable use of water resources and the conservation of water* through appropriate engineering and building requirements. (Mod F (f)(ii))*

Section 5.0  
Servicing and  
Transportation

### 5.2.2 POLICIES

#### 5.2.2.1 GENERAL POLICIES

- (a) The goals and policies of this section will apply to the lands designated Water Treatment Centre on Schedule A – Land Use of this Plan.
- (b) In addition to sanitary sewage treatment facilities, water treatment and storage facilities and accessory structures, this designation shall permit minor installations associated with the City of Barrie, its electrical power utility, and other utilities.
- (c) The City shall endeavour to use modern and cost effective water pollution abatement measures in order to provide safe, sanitary and efficient methods of water treatment and waste water disposal.
- (d) The City may augment its water supply system as required by means of the construction of surface water treatment plants.
- (e) Lands designated Water Treatment Centre shall be zoned in a separate category in the implementing Zoning By-law.
- (f) Sufficient revenue shall be generated to recover the full cost of maintaining the provision of full *municipal* water and wastewater services to properties in the City. (Mod F (g))
- (g) *Plans for expansion or for new services are to serve growth in a manner that supports achievement of the intensification and density targets of this Plan. (Mod F (h))*

- (h) The City shall develop a water conservation strategy in order to most efficiently utilize its water supply infrastructure and water resources.

#### 5.2.2.2 **NEW AND EXPANDED SEWAGE TREATMENT ~~PLANTS~~FACILITIES**

- (a) *For a proposed settlement area expansion, establishment of a new settlement area or a development proposal outside of a settlement area that requires an increase in the existing rated capacity of a sewage treatment plant or the establishment of a new sewage treatment plant, an environmental assessment of the undertaking shall be completed or approved prior to giving any approvals for the proposal under the Planning Act or the Condominium Act, 1998.*
- (b) No new municipal ~~sewagewastewater~~ treatment ~~plant~~facilities shall be established in the Lake Simcoe watershed unless:
- i) *the new plant is intended to replace an existing municipal sewage treatment ~~facilities~~plant; or*
  - ii) *the new sewage treatment ~~plant~~facilities will provide sewage services to a development that is on partial services or a development where one or more subsurface works or on-site sewage systems are failing.*
  - iii) *New sewage treatment facilities shall be located outside of vulnerable areas where they would be a signification drinking water threat.*
  - ii)iv) *Expansions to existing sewage treatment facilities may be required to be outside of a vulnerable are provided that such expansion would not increase the risk to drinking water.*
- (c) No new non-municipal sewage treatment ~~plant~~facilities shall be established in the Lake Simcoe watershed unless the person applying to establish the plant can demonstrate that:
- i) *the plant will result in a net reduction of phosphorous loadings to the watershed from the baseline conditions for the property that would be serviced by the new plant; or*
  - ii) *the undertaking that the plant will not add phosphorus loadings to the Lake Simcoe watershed. (Mod F (i))*

## 6.0 IMPLEMENTATION

### 6.11 REQUIRED STUDIES IN SUPPORT OF DEVELOPMENT APPLICATIONS

In order for a development application to be considered complete in accordance with Sections 22, 34, 41, 51 or 53 of the *Planning Act*, the City of Barrie may require the following reports or studies be prepared to the City's satisfaction:

- (a) Needs/planning justification report except for applications for new aggregate operations
- (b) Functional servicing report
- (c) Stormwater management report
- (d) Environmental evaluation study
- (e) Environmental impact study
- (f) *Environmental assessment study*
- (g) Traffic impact study
- (h) Hydrogeological/hydrology study
- (i) Agricultural assessment
- (j) Fisheries impact study
- (k) Archaeological study
- (l) Architectural/cultural heritage report
- (m) Affordable housing report
- (n) Urban design report
- (o) Aggregate potential assessment *and/or Aggregate license compatibility assessment*
- (p) Wellhead protection area – risk assessment report
- (q) Hazards lands/slope and soil stability report
- (r) Tree preservation plan/inventory
- (s) Noise/vibration impact analysis
- (t) Odour/dust/nuisance impact analysis
- (u) Illumination study
- (v) Shadow/shading study
- (w) Wind study
- (x) Market study
- (y) Fiscal evaluation and staging of development, including analysis of municipal revenues and expenditures
- (z) Digital plan according to City specifications
- (aa) Energy conservation and efficiency evaluation
- (bb) *Coastal engineering studies along the Lake Simcoe shoreline*
- (cc) *Heritage impact assessment*
- (dd) Marine archaeological assessment
- (ee) Source water information form
- (ff) Source Water Impact Assessment and Risk Management Measures Plan
- ~~(dd)~~(gg) Risk Assessment and Risk Management Plan.

The need for any or all of the studies listed from (a) to (dd) shall be determined by the City of Barrie following consultation between the City and the applicant.  
**(Mod G (y))**

Studies, reports, and plans in support of an application are to be submitted in digital and paper formats in quantities determined by the City.

#### **6.11.1 OTHER IMPLEMENTATION MEASURES**

The City may pass other by-laws from time to time to implement and supplement the goals and objectives of this Plan. Such by-laws may include but are not limited to tree-preservation by-laws, pesticide use by-laws, animal control by-laws, fencing by-laws, drainage by-laws and emissions by-laws, change of use by-laws, sewer use by-laws, or by-laws to control the application, handling, storage or use of pathogens, chemicals and dense non-aqueous phase liquids that may constitute a threat to municipal drinking water.



July 10, 2023

Antonietta Minichillo, MES, MCIP, RPP  
Chief Planner, Director of Planning  
Planning Department  
Town of Caledon  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

Dear Ms. Minichillo.

Re: Town of Caledon Official Plan  
Request to Designate Lands in Caledon for Employment Uses

The Request

The purpose of this letter is to request that through the Town of Caledon's Future Caledon Official Plan Review that the lands located at the southwest quadrant of Humber Station Road and Healey Road north of the proposed GTA West Highway corridor be designated for Employment Area consistent with Caledon's Growth Concept endorsed by the Town of Caledon Council on June 28, 2022, and attached hereto.

Background

As you are aware, Council on June 28, 2022, endorsed a Growth Concept that provided an Employment Area designation on the lands in the southwest quadrant of Healey Road and Humber Station Road. Staff also recommended the Growth Concept endorsed by Council in their report (Staff Report 2022-0303) as the Town's vision for growth to 2051 to better align with Caledon's long-term growth management and community planning objectives. As noted in the staff report, the planning rationale for designating these lands as Employment Area include:

- The vision for the future development of Caledon's Employment Areas is to build upon the existing employment areas in south Bolton, Mayfield West, and Tullamore, but in particular to focus employment growth in areas with proximity and access to the existing and future highway network.
- The identification of this area as Employment Area is consistent with Provincial policy direction to municipalities to designate and preserve lands within settlement areas, adjacent to major goods movement facilities and corridors,



including major highway interchanges, as areas for manufacturing, warehousing and logistics, and appropriate associated uses and ancillary facilities.

- This area is also adjacent to the Option 6 lands, now designated as Employment Area in the Peel 2051 Official Plan, and together the lands form a large contiguous employment land block, which can be planned in a comprehensive and/or staged manner for land extensive employment uses requiring good highway access.
- The area is more appropriate for employment uses given its proximity to future Highway 413, including a proposed interchange.
- Designation as Employment Area was consistent with the Region's conclusions, before changing course and concluding that this area is less attractive for employment uses without Highway 413, and only to ensure there is sufficient Community Area in the Settlement Area Boundary Expansion (SABE).
- The area can be developed as part of an overall employment land block together with the Option 6 lands in the Bolton Residential Expansion Area (BRES), which the Region added to the Employment Area in the final Peel 2051 SABE recognizing its suitability for employment uses.

It is also noted that establishing an Employment Area designation on these lands would prevent a new residential community being located south of Healey Road, to the immediate west of an Employment Area and to the north of a Highway corridor and including an interchange.

Solmar recognizes that the Region of Peel Official Plan designates these lands for Community Area and that the current draft of the Town's new Official Plan identifies these lands for Community Area consistent with Peel's Official Plan. However, Solmar strongly supports the Employment Area vision for these lands endorsed by Council and recommended by the Town's Planning Staff. Accordingly, Solmar requests that through the Town's Future Caledon Official Plan review that the Town of Caledon reconsider the Community Area designation and designate these lands for an Employment Area consistent with Caledon's Growth Concept endorsed by Council and recommended by Planning Staff.

Solmar looks forward to working with the Town staff and Council to achieve an Employment Area designation for these lands.





6. Mauro Peverini

Sincerely,

A handwritten signature in blue ink, appearing to read "Mauro Peverini", is written over the typed name and title.

Mauro Peverini, MCIP, RPP  
Vice President, Planning and Land Development  
Solmar Development Corp.

T. 905.660.9222 Ext. 293

M. 437.247.2310

[mauro@solmar.ca](mailto:mauro@solmar.ca)

/Attachment

Copy: Honourable Mayor Annette Groves  
Regional Councillor Mario Russo  
Steve Burke, MCIP, RPP, Manager Strategic Policy Planning



# Schedule A to Report 2022-0303

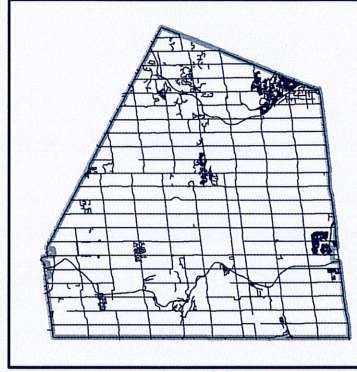
Caledon's Growth Concept  
Town of Caledon,  
Regional Municipality of Peel

## Legend

- Community Area
- Employment Area
- Future Strategic Employment Reserve
- GTA West Preferred Route
- Existing Settlement Areas
- Greenbelt
- Provincially Significant Employment Zone

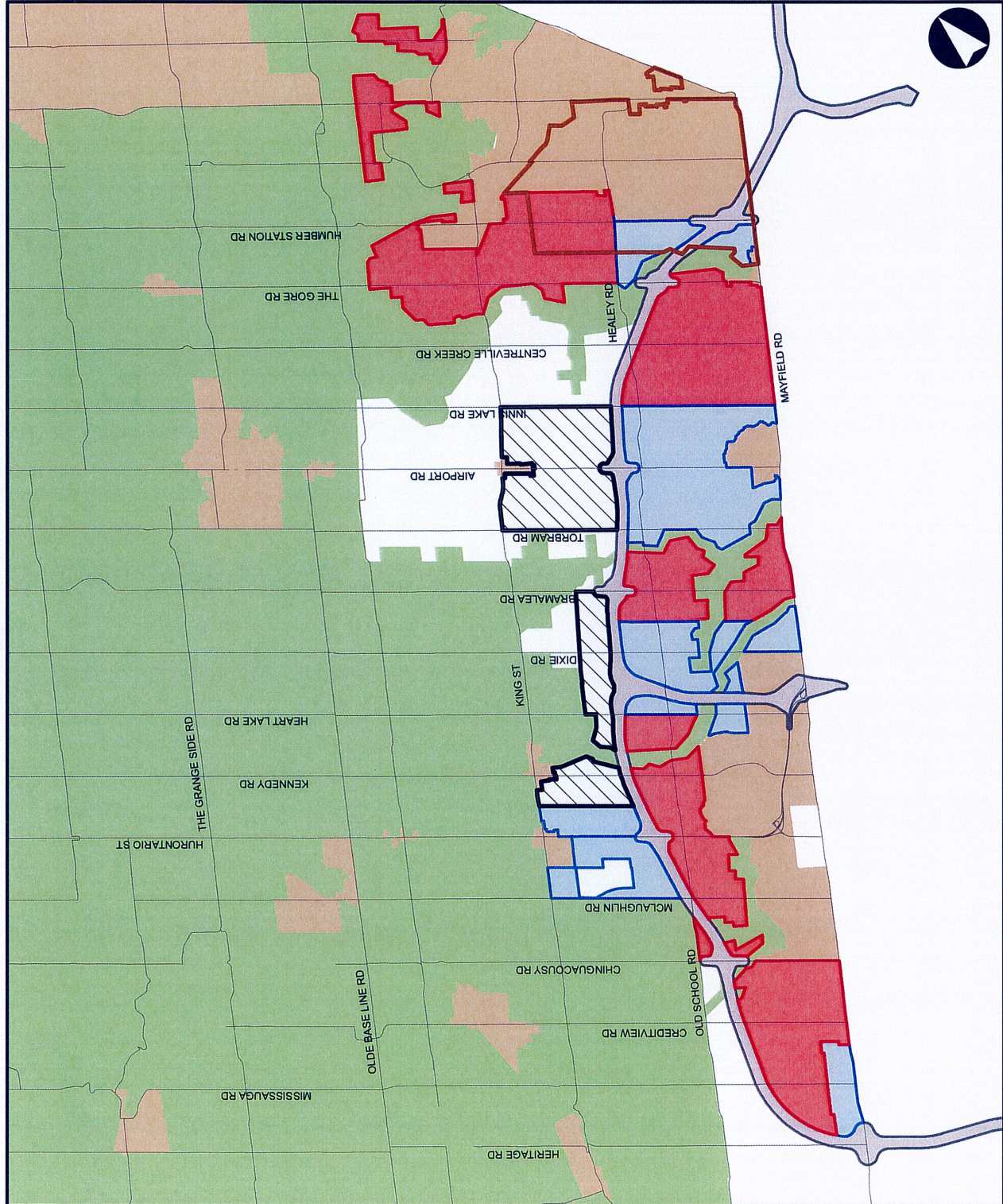
6. Mauro Peverini

## Key Map



Date: June 29, 2022

File:







July 13, 2023

Bailey Loverock  
Team Lead  
Official Plan Review  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Dear Bailey:

**RE: James Dick Construction Ltd. Comments on Town of Caledon Revised Draft Official Plan (June 2023)**

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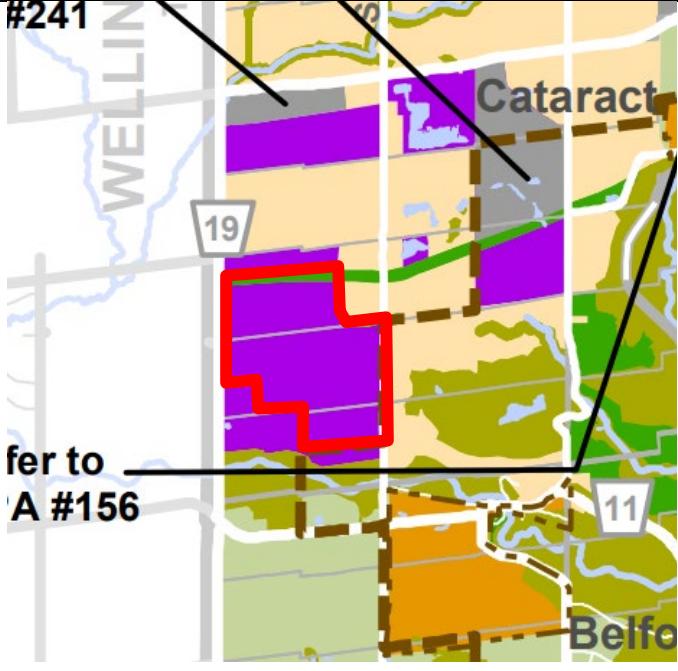
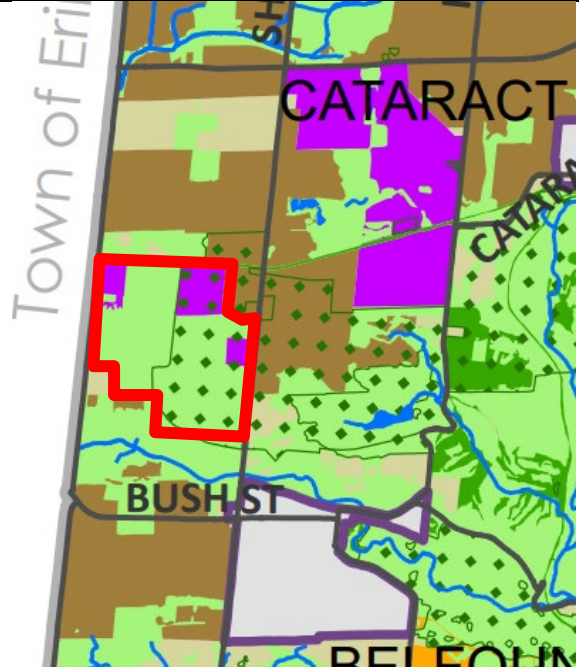
On behalf of our client, James Dick Construction Ltd. (JDCL), we are providing the following comments on the Town's Revised Draft Official Plan specifically regarding Schedule B4 Land Use Designations. We are currently reviewing the draft policies and will be providing additional comments following our review.

Please note that we previously provided comments to the Town on the Draft Official Plan released in March 2022. We have enclosed these comments for reference.

In advance of any additional comments on the draft policies, we felt it prudent to identify mapping errors on Schedule B4 as it relates to the JDCL Erin Pit on Winston Churchill Boulevard.

The Erin Pit lands are currently designated Extractive Industrial in the Town's Official Plan however this designation has been incorrectly removed from most of the site in the Revised Draft Official Plan on Schedule B4. See mapping comparison on the following page.

The Erin Pit was approved by the Local Planning Appeal Tribunal on April 30, 2021 (PL171488) and is currently zoned to permit aggregate extraction. Further, it is licensed under the Aggregate Resources Act (Licence #626172).

Existing Official Plan	Revised Draft Official Plan (Schedule B4)
<p>#241</p>  <p>Purple: Extractive Industrial</p>	 <p>Lands should be correctly designated as Extractive Industrial (purple)</p>

Therefore, we request that the mapping on Schedule B4 be corrected to reinstate the Extractive Industrial designation on the Erin Pit per the current Official Plan. Further, we would request that the existing Extractive Industrial designation on lands adjacent to the pit be maintained. These aggregate designations were included as part of a comprehensive settlement on mutual consent amongst parties through the OPA 161 OMB process and should be maintained.

If you have any questions, please let us know.

Yours truly,

**MHBC**



Neal DeRuyter, BES, MCIP, RPP

cc. Steve Burke, Town of Caledon  
Greg Sweetnam, JDCL  
Leigh Mugford, JDCL

Encl.



KITCHENER  
WOODBIDGE  
LONDON  
KINGSTON  
BARRIE  
BURLINGTON

April 20, 2022

Bailey Loverock  
Team Lead, Official Plan Review  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Dear Bailey:

**RE: James Dick Construction Ltd. Comments on Caledon Draft Official Plan  
OUR FILE 9153F**

---

On behalf of our client, James Dick Construction Ltd. (JDCL), we are pleased to provide the following comments on the Town's Draft Official Plan released in March 2022.

### **Aggregate Policy and Mapping Review**

We understand that the Town and Region are reviewing aggregate policies and mapping separately which will be brought forward as a separate amendment at a later date. Similar to the approach taken in the Region's Draft Official Plan, we recommend that the Town include a disclaimer on the aggregate mapping (Draft Schedule C5) and policies that this review is underway and will be updated through a separate process. This is important because, as an example, the aggregate mapping will have to be updated to incorporate ARIP mapping updates from the Province.

### **Pre-Designated Extractive Industrial Policy**

Section 5.11.2.2.1 of the existing Official Plan contains the following policy:

*Existing extractive operations are designated Extractive Industrial Area on Schedule A to this Plan. The Extractive Industrial Area designation does not distinguish between above and below water table extraction. New operations or expansions to existing operations will be designated either Extractive Industrial A Area for above water table extraction or Extractive Industrial B Area for above and below water table extraction. An amendment to this Plan will be required to change an extractive operation from Extractive Industrial A Area to Extractive Industrial B Area with the exception of the proposed expansion of the licence on the lands located on the South 1/2, Lot 12, Concession 1 WHS and on the Northwest 1/4 of Lot 12, Concession II WHS (Caledon). An amendment to the Niagara Escarpment Plan is required for any future extraction below the water table for these lands. The Town will consider the appropriateness of any proposed extraction below the water table through the Niagara Escarpment Plan Amendment and Development Permit process and in accordance with the applicable provisions of this Plan. Should an*

## 7. Neal Deruyter

*amendment to the Niagara Escarpment Plan to permit extraction below the water table be approved on these lands designated Extractive Industrial A, this Plan would be deemed to permit below water table extraction without an amendment to this Plan.*

*Notwithstanding the above Section, any property designated Extractive Industrial Area at the time of the adoption of these policies will retain that designation despite there not being an existing extractive operation on those properties. The Extractive Industrial Area designation does not distinguish between above and below water table extraction. In addition, notwithstanding Section 5.11.2.2.5, these properties may be developed for aggregate extraction purposes in accordance with Section 5.7.3.6 and Section 5.11.2.4.7 of this Plan.*

It would appear that this policy has been removed from the Draft Official Plan. We don't understand the basis for its removal especially considering the Town's direction that the existing aggregate policies have not been revised as part of this exercise. The second half of the policy addresses properties that are "pre-designated" Extractive Industrial. This section of the policy should remain in effect as there continue to be lands designated Extractive Industrial that are not yet licensed. These policies were included as part of a comprehensive settlement on mutual consent amongst parties through the OPA 161 OMB process.

Similar to this concern, we also question why the introductory paragraphs currently contained in Section 5.11 of the existing Official Plan have been removed in the Draft Official Plan. A significant amount of effort was undertaken through OPA 161 to establish these policies which we think provide relevant context and understanding for the Town's aggregate policies.

### **Extractive Industrial A/B**

The Draft Official Plan carries forward the designation Extractive Industrial A Area for above water extraction only and the Extractive Industrial B Area for either above or below extraction (4.10.15).

In 2020, the PPS was revised to state: "*Where the Aggregate Resources Act applies, only processes under the Aggregate Resources Act shall address the depth of extraction of new or existing mineral aggregate operations*" (PPS 2.5.2.4).

As a result of this change, the Town's existing approach of designating extraction sites based on above or below water extraction may no longer be consistent with the PPS.

### **Environmental Policy Area Mapping**

It would appear based on a quick review that there has been a substantial increase in the amount of land proposed to be designated Environmental Policy Area. JDCL would like to further understand how these areas were identified relative to existing EPA lands. How will this change affect CHPMARA mapping, and protecting and making available high quality, close to market aggregate resources?

### **Strategic Pillars (Section 2.5.5)**

For Pillar #5: 'Manage Our Aggregate Resources', we recommend that the Town add the following policy objective which is also included in Section 4.10.3 of the Draft Official Plan in order to implement the PPS 2.5.2.1 direction:



## 7. Neal Deruyter

*As much of the mineral aggregate resources as is realistically possible shall be made available as close to markets as possible.*

### **Applications in Transition / 2-Year OPA Moratorium**

It is our understanding that the Draft Official Plan is considered a "New Official Plan". Accordingly, we recommend that the Town consider incorporating the following policies to address OPA applications in progress and an exception to the 2-year moratorium for aggregate applications as contemplated by the Planning Act:

*Development applications deemed complete prior to the date of this Plan's approval shall be permitted to continue and finally disposed of under the Official Plan policies that existed when the application was deemed complete.*

*In accordance with Section 22(2.2) of the Planning Act, a request to amend this Plan to establish a new or expanded mineral aggregate operation is allowed before the second anniversary of the first day that this Plan came into effect.*

Thank you for the opportunity to provide comments on the Town's Draft Official Plan. Please notify us of any future meetings or decisions regarding this matter. We would also kindly ask if we could meet with Town staff to further discuss these comments.

Yours truly,

**MHBC**



Neal DeRuyter, BES, MCIP, RPP

cc. Steve Burke, Town of Caledon  
Gail Anderson, Peel Region  
Mark Head, Peel Region  
Heather Watt, MMAH  
Erin Cotnam, NDMNRF  
Greg Sweetnam, JDCL  
Leigh Mugford, JDCL

## 8. Mark Krapez

Good evening . We noted in our submission a small error in NOT highlighting (by **bolding** or numbering )a rather important comment . We wish to highlight that unnumbered comment now that is in the text below in **BLUE and numbering it as Comment 6**

Thankyou on behalf of the Krapez family and farm. Please acknowlege receipt of this email.

Dear Town of Caledon , we previously commented in 2022 ( as attached below )

**Comment 1** We also attach again below a 2019 CVC mapping generated just for our farm to define and outline the Key Natural Features and and limits of development as it was in 2019 before the apporval of the Region OP and the mapping (which the Region admits in small fine print may be inaccurate). This is the same mapping the Town of Caledon now is relying on for their new OP to be approved now in 2023/24.

**Comment 2** Our property is currently zoned Escarpment Protection in the 2017 Niagara Escarpment Plan(NEP). Our current land use(s) do not conflict with the current applicable objectives of the NEP Escarpment Protection Area designation.

**Comment 3** If there is a area in the Final Caledon 2022 Official Plan showing EP ,that should be marked/ identified , we would not object to the Town planning using the CVC detailed survey of the limits of two watercourse and valley features ( attached Item 1) , which we requested the CVC in 2019 to establish the limits of the vineyard planting fields which was confirmed in November 22, 2022 site visit by CVC and Town of Caledon planning staff.

### 13.12.7 Natural Features That Have Been Disturbed Page D-32

a) Where a feature was identified as a *significant woodland* or other woodland as of the date of approval of this Plan, and no longer meets the definition of *significant woodland* or other *woodland* because of either a natural or anthropogenic disturbance, the feature will retain its status as either a *significant woodland* or other *woodland* and the policies of this Plan will continue to apply.

**Comment 6** The mapping The Town of Caledon relies upon for Significant Woodlands has been stated to be inaccurate by the Region of Peel . We have a Arborist that will verify , that the Significant Woodlands Designation is inaccurate . The area is an existing apple orchard that is over 25 years old and is part of a farm that also has 5.5 acres of vineyards. The MPAC land use designates this area on our property as farmland. We again request its removal from the Significant Woodlands and Key Natural Features. There is also an application to the NEC that was submitted before the adoption of this OP that is P/C/2022-2023 that recognizes an existing vineyard . Existing Caledon OP Section 5.7.3.1.4 states that as more detailed environmental information is obtained such as information from approved studies or site investigations/inspections , minor refinements to the limits of lands designated EPA on Schedules to this Plan , including minor additions or deletions , may be permitted without amendment to this Plan , provided such a minor modification is satisfactory to the Town and other agencies.

**Comment 4** The CVC has been to the property on November 22, 2022 and provided support for the limits of development as staked in 2019 to define the limit of the vineyards. The CVC provided the mapping that was attached in the original submission for comments in September 2022 by Krapez Estate Vineyards. The Town must recognize this refinement and not change the current Rural zoning to essentially an extension of the existing Caledon OP EP zoning. Such a mapping is an inaccuracy and will eliminate the current Rural zoning that exists and includes farmland for apple orchards and vineyards, which the Town of Caledon and MPAC recognize.

*b) Where a natural feature and area, key natural heritage feature, or key hydrologic feature has been removed without authorization in advance of making, or prior to approval of, an application for development or site alteration, Town staff will use all available information to determine the limit and classification of the feature that existed, and restoration of the feature will be required through the approval of the application for development or site alteration.*

*17.4.6 The minimum lot area for an on-farm diversified use is 4.0 hectares, and no less than 40 per cent of the lot is required to be in active agricultural use to qualify for this permission.*

*17.4.9 The implementing Zoning By-law will permit an on-farm diversified use that covers up to 2.0 per cent of the lot area up to one hectare and the maximum percentage of the 2.0 per cent lot coverage that can be used for buildings and structures is 20 per cent, up to a maximum of 1,000 square metres. An application to increase the permitted lot coverage beyond two per cent to a maximum of four per cent will require a re-zoning, where it must be demonstrated that the proposed on-farm diversified use: a) will be secondary to the principal agricultural use of the property;*

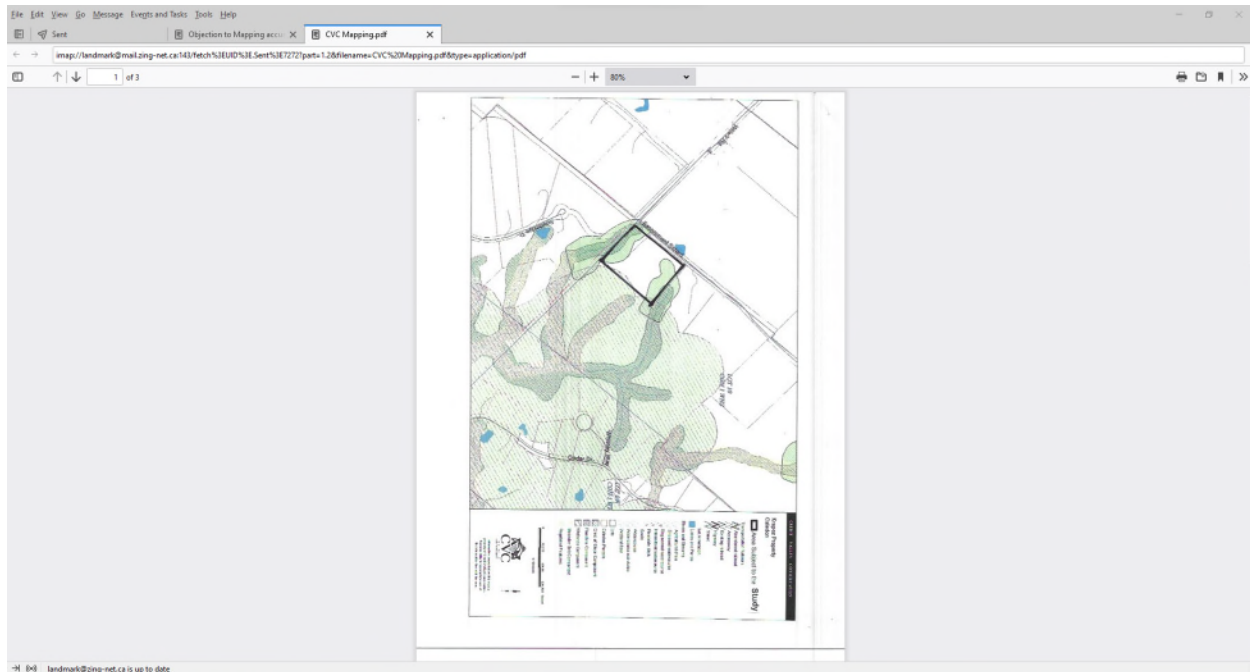
**Comment 5.**By the proposed new Caledon OP stipulating that 40% must be farmed to be eligible, this proposed 17.4.6 Section, will allow ONLY a 4.0 hectare farm with only 40% be actively farmed (or 1.6 ha just 3.5 acres) to meet this new Section. For example if you have 10 ha or 25 acres of approx but 5.5 acres (or 22 %) now under agriculture, that farmer would NOT qualify even though they have more acreage under active use 5.5 acres than a small farm at only 3.5 acres in active agriculture.

This is discriminatory for a mid sized farm. Also what if portion of the property and/or farm is also a Managed Forest under MPAC and MNR and has been for 30 years. There is no compensation or credit given in the Caledon OP for good stewardship of the Managed Forest even though it is a type of agriculture but not recognized as adding to the active agricultural use needed to qualify for a ONFDSU 40% as active agriculture (as worded). So for example a 25 acre parcel with 15 acres Managed Forest and 5.5 acres of active agriculture and 4.5 acres as Residential use would not be able to have an On Farm Diversified Use but this SMALLER property of only 4.0 ha or 10 acres that has ONLY 3.5 acres in active agriculture qualifies. That is wrong and unfair. The mid sized farms need to the ONFDSU to survive more than smaller farms that have less operating costs.

Respectfully submitted

Mark Krapez BES, M.Arch, OAA Architect on behalf of Krapez Estate Vineyards.

## 8. Mark Krapez



Dear Town of Caledon Planning

In addition to our objection last year to the proposed mapping changes we note that the draft proposed June 2023 OP version has not recognized our comments . In particular the mapping for **Significant Woodlands** as produced by the Region of Peel is inaccurate. We had completed after our submission for comments last year a EIS and the mapping clearly shows that the area marked as Significant Woodlands should be revised based on the more detailed site study completed last **September to October 2022 by Burnside and attached as Figure 2 . The Region of Peel mapping for Significant Woodlands ,which we understand the Town of Caledon is relying on, even has a disclaimer that their mapping may not be accurate.**

We note again that the mapping for **Schedule B4 Official Plan Land Use Designations and Schedule D1 Natural Features and Areas and Schedule D2 Significant Woodlands; which is connected to the mapping on Schedule D1 and Schedule B4;** is inconsistent and incorrect with the actual on the ground /site conditions and must be changed to reflect the currently submitted new EIS mapping . The Schedules noted include large portions of mowed areas that have been former apple orchards and now is used as a vineyard at 2521 Escarpment and lawn areas for 2593 Escarpment Road. It is also clearly evident in the air photo attached that the adjacent land owners property at 2593 Escarpment Road owned by Rachel and Ben Chen has large areas of mowed lawns and apple trees from the same apple orchard that historically existed and still exist on 2521 Escarpment property and extended into 2593 Escarpment . Both currently designated Rural land Use are incorrectly designated as Significant Woodlands.

Please advise us if you will or will not be recognizing this newly submitted information attached (The EIS mapping Figure 2 by Burnside) or require any further information to support our submission for comments of the June 2023 Draft Town of Caledon Official Plan.

Sincerely

## 8. Mark Krapez

Mark Krapez BES, M.Arch, OAA Architect on behalf of Krapez Estate Vineyards

Dear Town of Caledon Planning.

We are writing to inform you that we are objecting to the mapping change in our current Official Plan Land Designation from Rural to EP Environmental Protection as indicated in the current proposed 2022 draft Town of Caledon Official Plan). The proposed Town of Caledon 2022 EP zoning has been applied to basically all properties south of Escarpment Road (being our current 2521 and adjacent 2593 Escarpment owners) . In comparison, the two 100 acre properties , on the north side of Escarpment (opposite us) owned by 2888 Escarpment have virtually no additional new EP mapping and have essentially the same property characteristics.

As owners(Elizabeth and Mark Krapez), of 2521 Escarpment property we currently use our property as a residence and vineyard . The property has been owned by us since 1996 (26 years). We , the owners, are now retired and are registered Ontario Grape Growers and will be extending a multi-generational family tradition going back 400 years. Our current 10.6-hectare (25.6 acre) property was part of a 90 acre parcel until 2020 , when we donated (65 acres) 26 hectares to become the public Caledon Mountain Nature Preserve.

Our objection is that this new proposed EP designation is inaccurate and may/will limit our current vineyard and /or other uses or planned uses that normally are allowed in the current Rural designation. We are aware of the grandfathering clause but wanted to ensure either the EP overlay is corrected to the current Rural .

Our property Roll number 2124 030 004 20101 000 and is located on the south side of Escarpment Road 2 km west of Hurontario street /Number 10 Highway. (See Item 2 and 3 attached). Our property is characterized primarily by rolling topography that was formerly open pastures and fields. It is now manicured lawns , vineyards ,hawthorn, sumac, cherry, maple trees and dead ash trees.

Our property is currently zoned Escarpment Protection in the 2017 Niagara Escarpment Plan(NEP). Our current land use(s) do not conflict with the current applicable objectives of the NEP Escarpment Protection Area designation.

If there is a area in the Final Caledon 2022 Official Plan showing EP ,that should be marked/ identified , we would not object to the Town planning using the CVC detailed survey of the limits of two watercourse and valley features ( attached Item 1) , which we requested some time ago to establish the limits of the vineyard planting fields.

1. CVC mapping of Regulated Features map
2. CVC Life Sciences ANSI map
3. CVC Provincial Wetlands map

Sincerely

## 8. Mark Krapez

Mark Krapez BES, M.Arch, OAA Architect (retired) on behalf of Krapez Estate Vineyards.

*17.4.6 The minimum lot area for an on-farm diversified use is 4.0 hectares, and no less than 40 per cent of the lot is required to be in active agricultural use to qualify for this permission.*

By the Town planning stipulating that 40% must be farmed to be eligible it will allow a 4 .0 hectare farm with only 40% farmed (or 1.6 ha just 3.5 acres ) and in our case we have 10 ha or 25 cares approx but 5.5 acres now under agriculture BUT would NOT qualify for a ON FARM diversified use. There is a ZOOM meeting tonight at 6 pm. **Can I or you object officially? Does the Mangaed Forest component qualify for "agriculture"? That would add the required area to meet 40%**

July 24, 2023

GSAI File: 1115-003

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: June 2023 Draft Caledon Official Plan**  
**12600 Bramalea Road (Banty's Roost Golf Course)**  
**Anatolia Investments Corp.**  
**Town of Caledon**

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Glen Schnarr & Associates Inc. represents Anatolia Investments Corp., owners of 12600 Bramalea Road (Banty's Roost Golf Course) (herein referred to as the "Subject Lands"). GSAI has been monitoring the Caledon Official Plan process with respect to our client's lands. The Subject Lands are legally described as:

PT LT 21 CON 4 EHS CHINGUACOUSY; PT LT 22 CON 4 EHS CHINGUACOUSY PT 1 & 6,  
43R17182 ; CALEDON

The Subject Lands are 75 hectares (186 acres) in size, bordered by Old School Road to the north and Bramalea Road to the east. The Subject Lands are currently being utilized as a golf course. The Region of Peel Official Plan, approved by the Minister of Municipal Affairs and Housing on November 4, 2022, brought the Subject Lands into the 2051 Urban Area for community uses. Comment letters were previously submitted to Town staff on behalf of Anatolia Investments Corp., by Weston Consulting, dated April 8, 2022, and February 28, 2022 regarding the Official Plan process.

As per the updated draft Town of Caledon Official Plan schedules, the Subject Lands are within "Urban Area and Settlement Areas" on Schedule A1 (*see Figure 1*), within "Urban Area" on Schedule B1 (*see Figure 2*), within "Designated Greenfield Area" and "Neighbourhood Centre" designations, adjacent to an "Urban Corridor" (Bramalea Road) on Schedule B2 (*see Figure 3*), and within "New Community Area" on Schedule B4 (*see Figure 4*). The Subject Lands have frontage on Bramalea Road and Old School Road, which are designated as "Town Arterials" on the draft Transportation Network Schedule C1, and there are future conceptual collector roads shown throughout the Subject Lands, both north/south and east/west directions (*see Figure 5*).

On the previous draft schedule iterations, the Subject Lands were similarly shown within an "Urban Area", "Neighbourhood Centre" and along an "Urban Corridor", however, the previous Schedule B1 identified the lands as "Parks and Open Space". As noted in previous correspondence, this was perhaps reflective of the



existing use of the lands, despite being inconsistent with the future vision of the lands (urban, community land uses), as per the new Region of Peel Official Plan. We have noted that the Subject Lands are now consistently illustrated as “Urban Lands” on the updated draft schedules, and we are therefore supportive of this revision.

We would like to note that while we have no objections with the conceptual collector roads on the Subject Lands as per Schedule C1, it should be recognized in the policy text that the locations of these roads are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.

Furthermore, we offer the following comments on the draft policy text:

Policy Number	Policy Text	GSAI comments
4.2.2	“A minimum of 5% of all new residential development will be directed to lands within the Delineated Built-up Area, on an annual basis to 2051.”	How did the Town land on this percentage? Was there a study completed that supports this percentage and policy directive?
4.3.1	“Development within Designated Greenfield Areas, as identified on Schedule B2, Growth Management, will be designed to meet or exceed a density of 67.5 residents and jobs combined per hectare.”	GSAI notes that this density is higher than the minimum density as per the Growth Plan, and while we have no concerns with a higher density, we would like to know how the Town arrived at a density of 67.5 residents and jobs combined per hectare.
4.5.1	“When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.”	GSAI believes that policies 4.5.1, 4.5.3, and 4.5.4 are too restrictive and contradict the Planning Act. As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.  We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated</i>
4.5.3	“Privately initiated secondary plans will not be permitted.”	





4.5.4	<p>“Each secondary planning process will be initiated and led by the Town in accordance with the policies of this Plan, the Region of Peel Official Plan, and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities.”</p>	<p><i>Secondary Plans on a site by site circumstance.”</i></p> <p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council’s discretion.</p>
4.5.6	<p>“In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the new 2051 Urban Area until after the structure of a connected transportation system is planned to the Region’s satisfaction, including:</p> <p>a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and,</p> <p>b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway.”</p>	<p>GSAI understands this policy to mean that transportation planning, not construction, is needed prior to any Secondary Plan approval. Please confirm.</p>
4.5.7	<p>“In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.”</p>	<p>GSAI believes that there is no basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that the unknown future of the Region creates many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000</p>



		<p>additional people a maximum threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>
4.6.1	<p>“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:</p> <p>a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken by the Region of Peel, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the Designated Greenfield Area; and,</p> <p>b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan based on the analysis provided in the Region’s land needs assessment, while minimizing land consumption;</p> <p>c) the timing of the proposed expansion and the phasing of development within the Designated Greenfield Area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,</p> <p>d) the Growth Plan policies on settlement area boundary expansions are satisfied.”</p>	<p>Policies 4.6.1, 4.6.2 and 24.1.3 seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and that the PPS enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>



4.6.2	“The establishment of new settlement areas is prohibited.”	
24.1.3	“An official plan amendment to allow a settlement area boundary expansion may only be considered as part of a municipal comprehensive review, and in accordance with section 4.6, Settlement Area Boundary Expansions, of this Plan.”	
5.1.(b)	“The planning objectives for climate change mitigation and adaptation are as follows:  b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;”	Policies 5.1(b), 5.4.1 and 9.11.1 cannot be supported without understanding the Town’s Green Development Standards. Is this document completed and endorsed by Council? Using the word “requiring” is too onerous/restrictive. It should be revised to “encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).
5.4.1	“The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.”	
9.11.1	“The Town will implement a series of Green Development Standards in collaboration with community partners, development groups, and the Region to work towards the climate change objectives outlined in Chapter 5, Climate Change, of this Plan. All proposed housing developments will subject to review based	



	on these standards.”	
5.2.4	“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”	<p>Policy 5.2.4 could be problematic if no Terms of Reference are prepared by the Town to review for an alternative and renewable energy systems feasibility study. Furthermore, GSAI believes the word “required” should be replaced with the word “encouraged”.</p> <p>We suggest that in every instance where the Official Plan policy refers to a study requirement, the Town should first have in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p>
5.4	Green Development Standards section	Same concerns as noted above.
7.1. a)	<p>“...to ensure this new communities and developments will:</p> <ul style="list-style-type: none"><li>i) protect natural features and areas as contiguous systems, wherever possible;</li><li>ii) enhance the resiliency of natural features and areas through buffers and site design;</li><li>iii) conserve cultural heritage resources in context, wherever possible, and adapt built form to them;</li><li>iv) integrate existing landforms, uses, landmarks and significant site features; and,</li><li>v) respect context and important viewshed through setbacks, siting and design.”</li></ul>	Sub-policies ii) through v) should also include the language “wherever possible”.



7.1.b iv	<p>“To prioritize the long term benefits of growth focused around existing settlement areas, the Town will:</p> <p>iv. apply the highest applicable standards in architecture and landscape architecture”</p>	<p>We request this policy be reviewed to ensure it is consistent with Bill 23, particularly with respect to the delivery of housing and addressing the current housing crisis.</p>
7.2.10	<p>“School sites will, where possible, be co-located with other public service facilities, such as parks and community centres, in a manner that supports their development as community hubs, focal points for the community and neighbourhood gathering places.”</p>	<p>GSAI believes this is a positive and supportable policy.</p>
7.8.2	<p>“New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing:</p> <p>a) the height, massing, and scale of nearby buildings;</p> <p>b)the setbacks of buildings from the street;</p> <p>c)existing cultural heritage character and heritage buildings;</p> <p>d)the prevailing side and rear yard setbacks;</p> <p>e)landscaping and open space patterns;</p> <p>f)the size and configuration of lots; and,</p> <p>g) the existing/planned street pattern.”</p>	<p>This policy seems too restrictive. We encourage the policy to be revised to read “<i>New and infill development will recognize the existing and planned built form context, and <b>be compatible with</b> the character of the area....</i>”</p>
7.8.3	<p>“New buildings will be designed and oriented to front onto public streets to support a vibrant, active and pedestrian-oriented streetscape. Buildings on corner</p>	<p>This policy does not consider site specific context. Wording should be revised to replace “will be” to “are encouraged to be”.</p>



	sites will address the corner and both street frontage.”	
7.9.4	“Industrial building surface parking areas will be located in rear yards or well landscaped side yards with screening from public view.”	Policy 7.9.4 should allow opportunity for limited parking on the front yard to ensure appropriate convenience to people utilizing the industrial building. This policy should not outright restrict all parking in front of buildings.
7.9.9	“A minimum tree canopy cover of 30 per cent will be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws.”	With respect to policies 7.9.9 and 7.10.2, what is the basis for applying 30% tree canopy to parking lots and site area, respectively?
7.10.2	“All new developments should contribute to the overall tree canopy of the Town by achieving a minimum 30 per cent canopy coverage on the net developable area of the site, at the discretion of the Town. Canopy coverage is to be assessed as defined by the Town Wide Design Guidelines and Green Development Standards.”	
12.8	Broadband policies	We think these are positive policies. We support staff’s position that broadband development should be encouraged throughout the Town.
14.6.2	“Privately owned publicly accessible spaces contribute to the public realm but remain privately owned and maintained. They do not replace the need for new public parks and open spaces. Privately owned	While we support staff’s position that POPs should be eligible for parkland credit, consistent with Bill 23, we respectfully disagree with this part of the policy: “ <i>They do not replace the need for new public parks and open spaces.</i> ” POPs



	<p>Publicly Accessible Spaces provided through development will:</p> <p>...h) be eligible for parkland credit.”</p>	<p>can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.</p>
22.4	<p>“Neighbourhood Centre Designation</p> <p>The Neighbourhood Centre designation is intended to be applied to the lands conceptually shown as Neighbourhood Centre on Schedule B1, Town Structure. Neighbourhood Centres are to be planned as vibrant focal points for the surrounding neighbourhood offering a range of goods and services to the neighbourhood for resident and worker daily needs within easy walking or cycling distance. Development within Neighbourhood Centres will take the form of mid-rise mixed-use buildings that can incorporate a mix of residential, commercial, office and service uses. They will be designed with an emphasis on quality pedestrian streetscapes and will be highly connected to transit and cycling infrastructure.</p> <p>22.4.1 Objectives The planning objectives for the Neighbourhood Centre designation are as follows:</p> <p>a) facilitate mid-rise forms of development allowing for more affordable housing, to support commercial uses and create opportunities for neighbourhood residents to age in place.</p> <p>b) provide a broad range of neighbourhood-oriented uses, within mixed-use buildings, allowing the community to access daily needs within a convenient walking or cycling trip.</p>	<p>We have no questions or concerns regarding this proposed land use designation and support the proposed policies as drafted.</p>



	<p>c) establish a quality built form that will provide a focal point for neighbourhoods and contribute to their vibrancy, character and identity.</p> <p>d) create neighbourhood-scale transportation hubs that can integrate multiple modes of transportation and support transit ridership.</p> <p>e) create street environments that prioritize pedestrians, cyclists and transit users.</p> <p>22.4.2 Permitted Uses</p> <p>a) A broad range of residential, retail, mixed use, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses may be permitted.</p> <p>22.4.3 Development Policies</p> <p>a) Streets within the Neighbourhood Centre designation will be designed and laid out based on a modified grid pattern, which responds to topographical features, natural open spaces, built heritage, and existing development patterns.</p> <p>b) Elementary schools and other institutional uses should be co-located with parks, trails and other community uses, including day care facilities, to develop integrated community hubs.</p> <p>c) Day care facilities should also be integrated into residential areas.</p> <p>d) A comprehensive and integrated continuous trail network be established in each Neighbourhood Centre in order to contribute to the establishment of walkable,</p>	
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	<p>bicycle friendly and active mixed-used centres. Trails and/or walkways will be integrated into development proposals to maximize connectivity:</p> <p>i) within the Neighbourhoods Centre designation and between neighbourhoods and/or employment areas;</p> <p>ii) to active transportation routes; and,</p> <p>iii) to promote public access to community uses and natural areas and features.</p> <p>iv) Pedestrian and multi-use trails will provide access to and through parks and where appropriate, the Natural Environment System, and will be planned to help encourage active transportation as a viable means of both recreation and transportation.</p> <p>e) The local road system will be designed to enhance the pedestrian environment by increasing the visual interest of streets and pedestrian comfort through the provision of sidewalks, walkways, frequent intersections, attractive streetscapes and landscaping.</p> <p>f) Buildings as high as 10 storeys may be permitted.</p> <p>g) Neighbourhood Centres will be designed with a high priority placed on the pedestrian, cycling and transit experience, utilizing site layout, building location and building design to reinforce convenience, comfort and safety.</p> <p>h) Transit-oriented forms of development and transit-supportive public space design will be of a high priority for development</p>	
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	<p>within Neighbourhood Centres.</p> <p>i) The location and orientation of buildings will be required to frame and address parks and open space, and where possible, provide new opportunities for access and visual connections to the landscape as part of everyday life.”</p>	
22.5	<p>“Urban Corridor Designation</p> <p>The Urban Corridor designation is intended to be applied to the lands conceptually shown as Urban Corridors on Schedule B1, Town Structure. Urban Corridors connect neighbourhoods and are mixed-use, mid-rise communities themselves that support quality urban living environments connected to transit services and cycling infrastructure. Urban Corridors will provide a range and mix of activities that meet the needs of residents living within Corridors and also within surrounding neighbourhoods. These corridors are intended to play a major role in providing opportunities for compact forms of development that use land efficiently, provide opportunities for more affordable forms of housing and are transit-supportive. These corridors are anticipated to be approximately 100 metres in depth on either side of the road, and will be characterized by a mixture of primarily high-intensity forms of development, including retail and service commercial uses, offices and residential apartments, as well as community facilities.</p> <p>22.5.1 Objectives The planning objectives for the Urban Corridor designation are as follows:</p>	<p>We have no questions or concerns regarding this proposed land use designation and support the proposed policies as drafted.</p>



	<p>a) facilitate mid-rise forms of development that can allow for more affordable housing, support commercial uses and create opportunities for residents to age in place;</p> <p>b) provide a broad range of neighbourhood-oriented uses, within mixed-use buildings, providing the community access to daily needs within a convenient walking or cycling trip;</p> <p>c) establish a quality built form that will provide for attractive neighbourhood streetscapes that contribute to neighbourhood vibrancy, character and identity;</p> <p>d) create neighbourhood scale transportation hubs that can integrate multiple modes of transportation and support transit ridership; and</p> <p>e) create street environments that prioritize pedestrians, cyclists and transit users.</p> <p>22.5.2 Permitted Uses</p> <p>A broad range of retail, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses may be permitted. Medium and high density residential uses are also permitted. Ground-related medium density residential uses may be permitted towards the rear of the Urban Corridor.”</p>	
22.5.3	<p>“Development Policies The planned built form characteristics for this designation encourage the development of a wide variety of building forms, generally mid-rise in height, but with higher buildings depending on location. All buildings are</p>	<p>Policy 22.5.3(c) should allow height in Urban Corridors up to 12 storeys. An 8 storey height maximum is too restrictive to recognize future unforeseen market conditions.</p>



	<p>intended to have a strong street presence. On this basis, below are the design and built form criteria that will be applied in the Urban Corridors:</p> <p>c) Buildings up to 8 storeys may be permitted.”</p>	
23.4.4	<p>“The Regional Urban Boundary may only be expanded to include Future Strategic Employment Areas only through a Region of Peel Official Plan Amendment and municipal comprehensive review initiated by the Region.”</p>	<p>Policy 23.4.4 is outdated as per Bill 23 since the Region will no longer be involved in their planning function/role. This policy needs to be revised/removed. This would also apply to other policies that speak to involving or relying upon the Region for their planning function.</p>
24	<p>Official Plan Amendments</p>	<p>Section 24 should clearly specify where Official Plan Amendments are <u>not</u> required. It speaks to where OPAs are required but not the other way around.</p>
24.2.3	<p>“An official plan amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site will only be considered as part of an official plan review.”</p>	<p>GSAI disagrees with this policy as the word “significant” is subjective and could be interpreted differently.</p>
24.4.1	<p>“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”</p>	<p>This policy is too restrictive and does not provide flexibility for staff to determine if the Block Plan process is appropriately required. We suggest the wording be revised as follows: “<i>Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town <b>may</b> require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented</i></p>



		<i>and establish a context for coordinated development.”</i>
24.4	“The Town will prepare terms of reference for block plans and identify specific study requirements through the pre-consultation process for the required official plan amendment. The costs associated with the studies and the preparation of a block plan will be shared equitably among benefitting landowners on a proportional basis. Benefitting landowners who choose not to participate in the preparation of a block plan but later decide to develop their lands will be required to make a financial contribution to the costs of preparing the block plan based on their proportional share.”	At this time GSAI has no specific comments on this proposed policy.
27.3.2	“All development applications will be evaluated with consideration of the proposed use, the proposed development intensity, and the proposed form of development.”	This policy lists a great deal of criteria including consistency with the PPS, conformity with Provincial Plans and legislation, to changes in privacy and shadowing. Is it expected that all criteria will be weighted equally when evaluating development applications? Please advise.

Thank you for the opportunity to provide comments. Please contact the undersigned should you have any questions. We look forward to being involved in the subsequent stages of the Official Plan review.

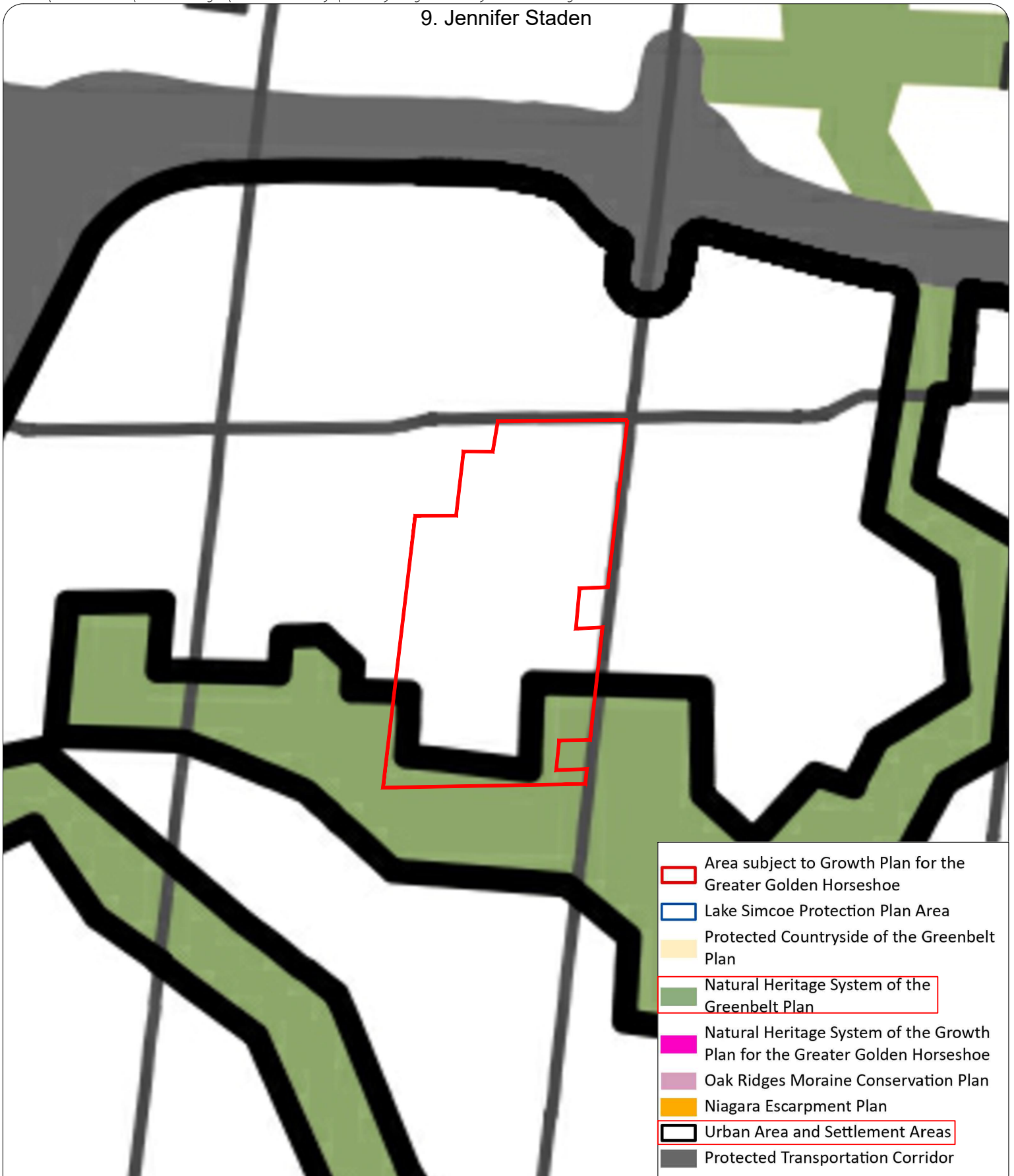
Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

**Jennifer Staden, MCIP, RPP**  
**Associate**

cc. Anatolia Investments Corp.

## 9. Jennifer Staden



FIGURE

1

### TOWN OF CALEDON DRAFT OFFICIAL PLAN

#### SCHEDULE 'A1' - PROVINCIAL PLAN AREAS

##### LEGEND

Subject Lands

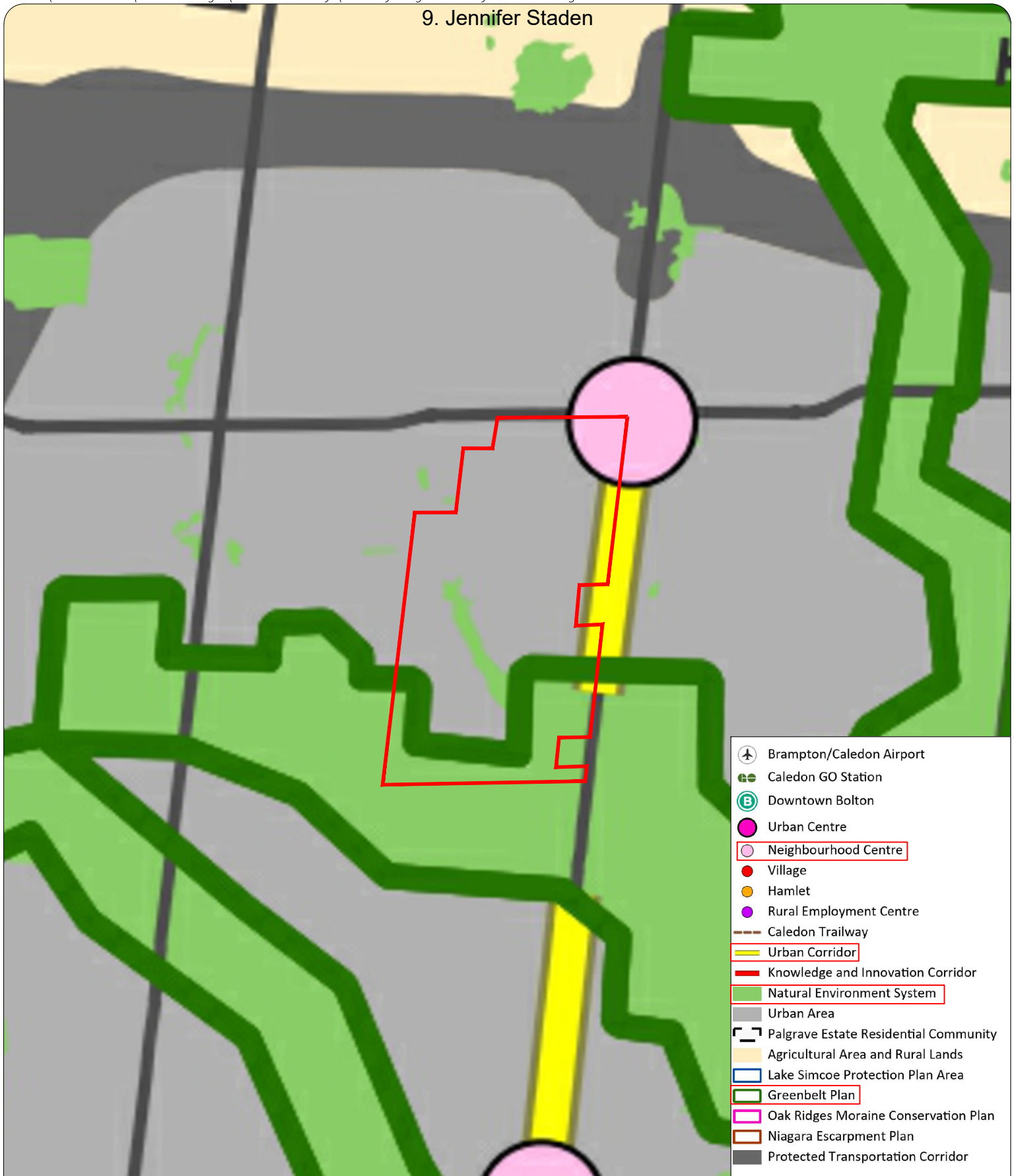
12600 BRAMALEA ROAD,  
PART OF LOT 21, CONCESSION 4 EHS,  
TOWN OF CALEDON,  
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS  
JULY 11, 2023



## 9. Jennifer Staden



FIGURE

2

## TOWN OF CALEDON DRAFT OFFICIAL PLAN

### SCHEDULE 'B1' - TOWN STRUCTURE

#### LEGEND

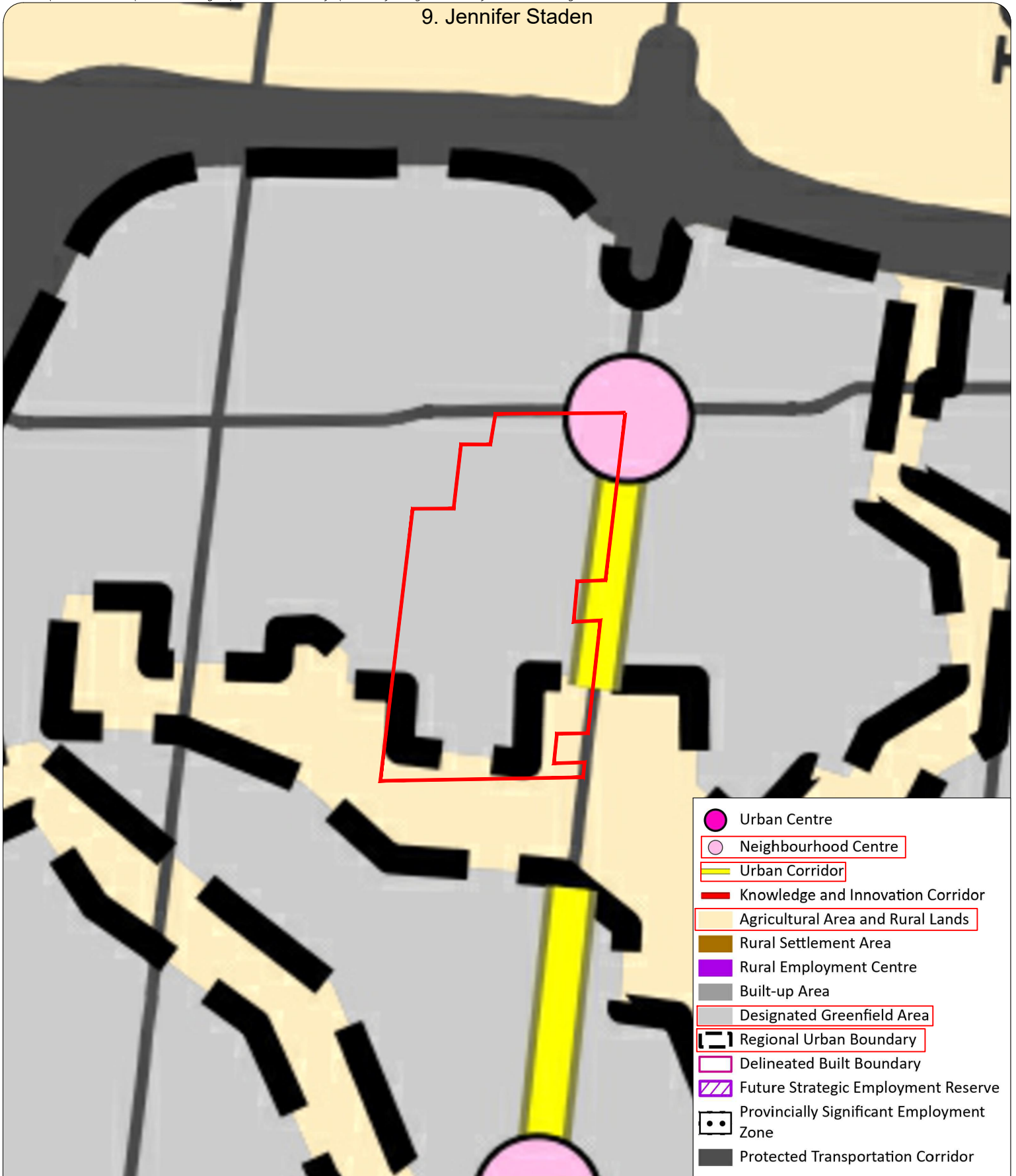
Subject Lands

12600 BRAMALEA ROAD,  
PART OF LOT 21, CONCESSION 4 EHS,  
TOWN OF CALEDON,  
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS  
JULY 11, 2023

## 9. Jennifer Staden



- Urban Centre
- Neighbourhood Centre
- Urban Corridor
- Knowledge and Innovation Corridor
- Agricultural Area and Rural Lands
- Rural Settlement Area
- Rural Employment Centre
- Built-up Area
- Designated Greenfield Area
- Regional Urban Boundary
- Delineated Built Boundary
- Future Strategic Employment Reserve
- ● Provincially Significant Employment Zone
- Protected Transportation Corridor

FIGURE

3

## TOWN OF CALEDON DRAFT OFFICIAL PLAN

### SCHEDULE 'B2' - GROWTH MANAGEMENT

#### LEGEND

  Subject Lands

12600 BRAMALEA ROAD,  
PART OF LOT 21, CONCESSION 4 EHS,  
TOWN OF CALEDON,  
REGIONAL MUNICIPALITY OF PEEL

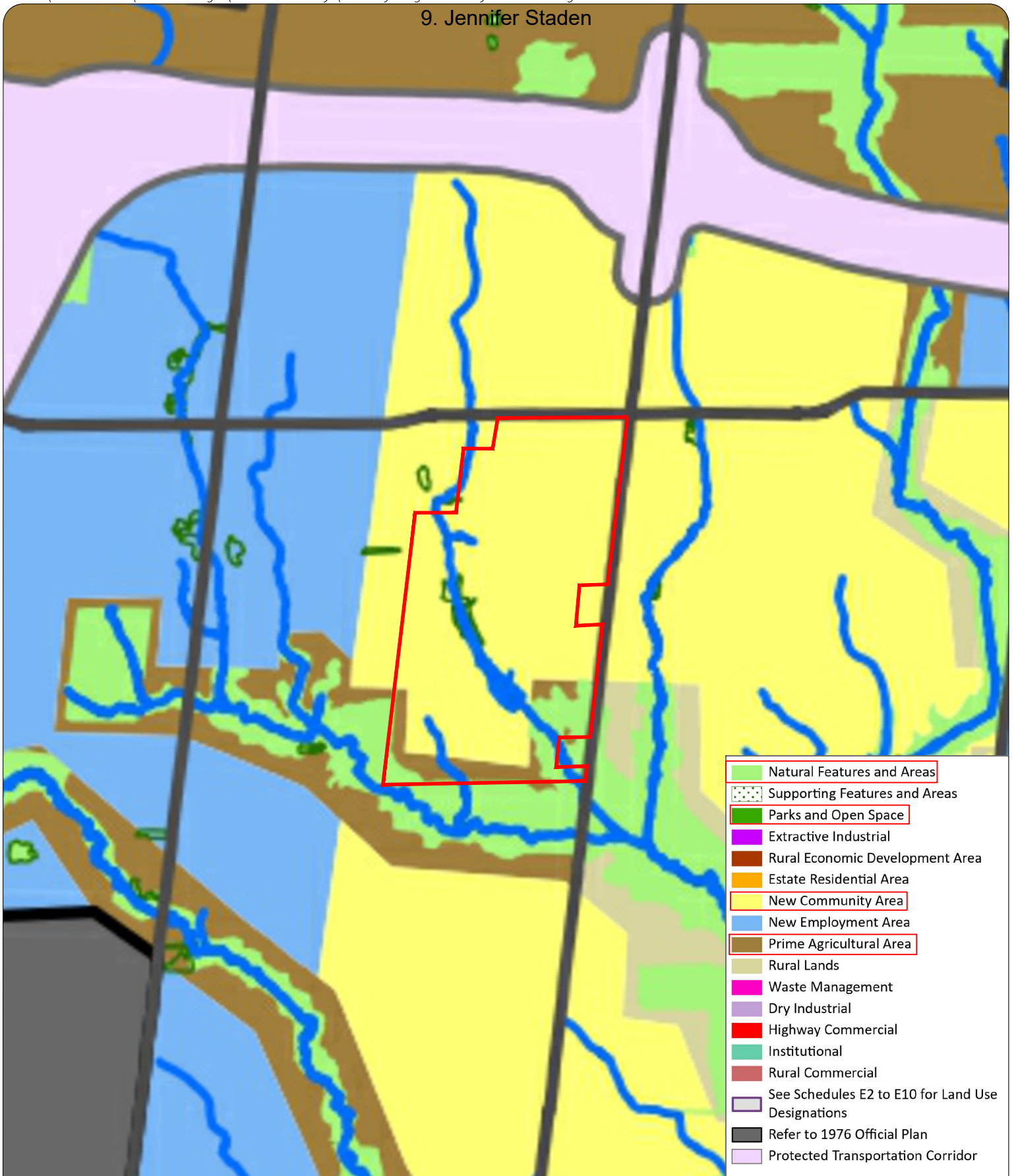


SCALE NTS  
JULY 11, 2023

**GSAI**  
Glen Schmitt & Associates Inc.



# 9. Jennifer Staden



FIGURE

4

## TOWN OF CALEDON DRAFT OFFICIAL PLAN

### SCHEDULE 'B4' - LAND USE DESIGNATIONS

#### LEGEND

Subject Lands

12600 BRAMALEA ROAD.  
PART OF LOT 21, CONCESSION 4 EHS,  
TOWN OF CALEDON,  
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS  
JULY 11, 2023

# 9. Jennifer Staden

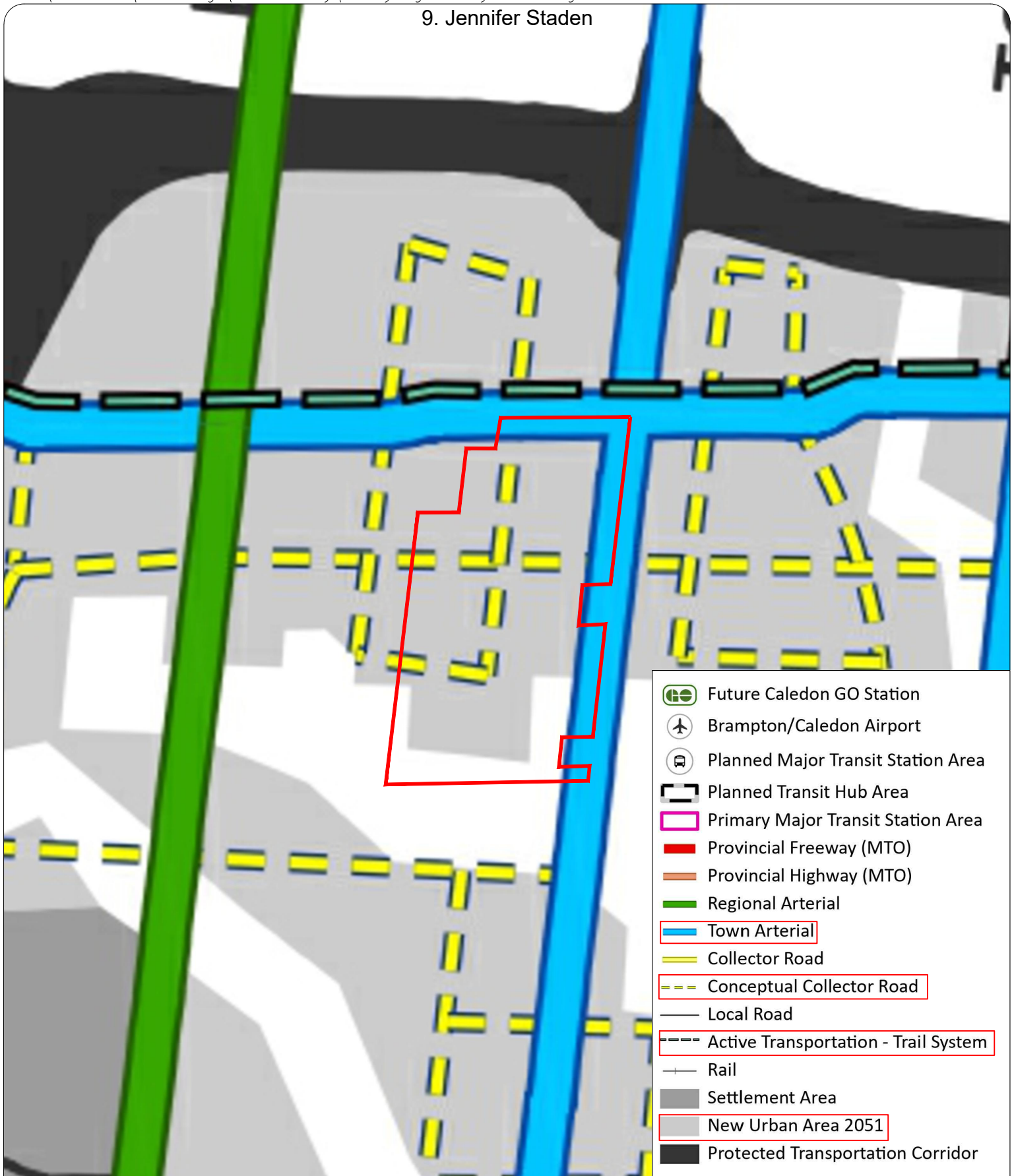


FIGURE 5 TOWN OF CALEDON DRAFT OFFICIAL PLAN  
SCHEDULE 'C1' - TRANSPORTATION NETWORK

## LEGEND

Subject Lands

12600 BRAMALEA ROAD.  
PART OF LOT 21, CONCESSION 4 EHS,  
TOWN OF CALEDON,  
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS  
JULY 11, 2023



**VIA EMAIL**

July 27, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – June 2023 Draft  
Comments on Behalf of Choice Properties REIT**  
**Our File: CHO/CAD/20-01**

---

We are the planning consultants for Choice Properties (“Choice”) for the Town of Caledon Official Plan Review. Choice is the owner of lands within the Town of Caledon (the “Choice Lands”), including:

- 487 Queen Street South;
- 99 McEwan Drive East; and
- 0 and 12245 Torbram Road and 12542 Airport Road.

At this time, Choice does not have specific plans for the redevelopment of 487 Queen Street South and 99 McEwan Drive East, and are seeking to maintain existing operations while allowing for short- and medium-term modest infill or expansion to respond to the market demand.

The Choice Lands 0 and 12245 Torbram Road and 12542 Airport Road, received a Minister’s Zoning Order (O.Reg.483/22), and applications for an Official Plan Amendment (POPA 2021-0007) and Draft Plan of Subdivision (21T-21002C) are currently under review by the Town. The site is over 480 acres and will be used for warehousing, distribution centres, and other industrial uses.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of Choice, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review. On behalf of Choice, we have preliminary comments as outlined below, and will continue to review the June 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule A1 Provincial Plan Areas, all of the Choice Lands are shown as Urban Area and Settlement Areas;

- On Schedule B1 Town Structure, the Choice Lands are shown as Urban Area. 0 and 12245 Torbram Road and 12542 Airport Road have portions of the lands shown as Natural Environment System. 487 Queen Street South is shown located along the Urban Corridor (Queen Street). Additionally, 487 Queen Street South appears to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;
- On Schedule B2 Growth Management, 487 Queen Street South and 99 McEwan Drive East are shown as Built-Up Area. 487 Queen Street South is located along the Urban Corridor (Queen Street) and appears to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre. 0 and 12245 Torbram Road and 12542 Airport Road are shown as Designated Greenfield Area, with portions of the lands shown as Agricultural Area and Rural Lands;
- On Schedule B4 Land Use Designations, 487 Queen Street South and 99 McEwan Drive East are shown as "Refer to the 1976 Official Plan". 0 and 12245 Torbram Road and 12542 Airport Road are primarily shown as New Employment Area, yet includes other designations including Natural Features and Areas and Rural Lands;
- On Schedule C1 Town – Wide Transportation Network, 487 Queen Street South is located along a Regional Arterial Road (Queen Street). 0 and 12245 Torbram Road is located along a Town Arterial Road (Torbram Road) and 12542 Airport Road is located on a Regional Arterial Road (Airport Road); and
- On Schedule C2 Road Right-of-Way Widths, 487 Queen Street South is shown with a 45 m ROW (not identified under current Official Plan). 12245 Torbram Road is shown with a 30 m ROW and 12542 Airport Road is shown with a 45 m ROW.

As a general comment, the Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area (as the Choice Lands are considered), as no land use plan has been prepared for lands within the Urban System. A fulsome and informed review of the policies of Section F can therefore not be completed, as information is outstanding. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that Part F be withheld from consideration, or that land use schedules be prepared.

For the comments below, please note that the references below to "Formerly" refers to the Policies and Sections under the March 2022 draft Official Plan. At this time, our preliminary comments for the June 2023 Draft Official Plan are as follows:

- The Choice Lands at 0 and 12245 Torbram Road and 12542 Airport Road are subject to an approved Minister's Zoning Order (O.Reg.483/22), as well as active Official Plan Amendment and Draft Plan of Subdivision applications. We seek clarification as to how approved Minister's Zoning Orders and active applications are to be addressed in the draft Official Plan, including any transitional matters;
- A Neighbourhood Centre has been identified on Schedules B1 and B2, and appears to be located in proximity to 487 Queen Street South. It appears as if the Neighbourhood Centre has been moved south from the March 2022 draft, and we seek clarification as to the proposed extent of the Neighbourhood Centre. We reiterate our previous comment that it is appropriate **to consider the Choice Lands as part of the Neighbourhood Centre**;



- Policy 7.5.3 (Formerly Policy 4.3.40) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks (e.g., commercial, employment and institutional blocks), to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the Choice Lands);**
- Policy 7.8.4 states “Buildings of four storeys or greater will be designed with stepbacks on storeys above the fourth storey to achieve: a) a human-scaled ground floor; b) vistas or massing transition to heritage buildings and/or sites; and, c) built form transition to existing and planned surrounding development of a lower scale and intensity and form.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.8.6 (formerly Policy 4.3.38) states “Building servicing, as well as parking, access, loading, and waste collection areas, *will* [emphasis added] be incorporated into the building design, located away from sensitive land uses, and be separated and screened from view as required by the Town and applicable urban design guidelines.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.9.2 (formerly Policy 4.3.60) states “Where parking areas cannot be located below grade or behind buildings, at the discretion of the Town, *limited* [emphasis added] parking may be located at the side yard of the building but will incorporate a planted buffer and hard and soft landscaping treatments along the property line to address the pedestrian boulevard and mitigate views to at-grade parking.” **We reiterate our comment that the policy should provide for greater flexibility to account for use, site context and operational aspects;**
- Policy 7.9.3 (Formerly Policy 4.3.59) states “Residential and multi-unit residential buildings *will* [emphasis added] be designed with parking areas located below grade or behind the main front wall of the building. Parking between the building façade, or entrance, and the pedestrian boulevard *will* [emphasis added] not be permitted to ensure that the boulevard is defined by a continuous built form edge.” **We reiterate our comment that “will” should be changed to “should be” in order to provide flexibility to account for use, site context and operational issues and in recognition of Policy 7.9.2 (Formerly Policy 4.3.60), such as for the Choice Lands, which have public roads on 3 sides of the site;**
- Policy 7.9.7 states “For commercial sites where parking requirements are equal to or exceed 30 per cent of the net developable area of a site, at the discretion of the Town, overall site and parking area design will prioritize separated pedestrian access to/from the right-of-way, parking areas and building(s), and provide: ... c) internal streets, where appropriate, based on complete streets design standards to encourage pedestrian use.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and the operational aspects, since having internal streets based on complete streets may not be appropriate in all circumstances;**

- Policy 7.9.9 (formerly Policies 4.3.58 and 4.3.70) states “A minimum tree canopy cover of 30 per cent *will* [emphasis added] be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws”. **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.9.10 states “Truck and/or trailer parking, staging or loading areas *will* [emphasis added] not be located between the front elevation of a building and a public street and will be screened from the public realm.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context, the operational aspects of commercial and employment uses and to avoid rendering existing development as non-conforming;**
- Policy 7.10.1 (Formerly Policy 4.3.42) states “Buildings, outdoor spaces and entrances of new and infill development *will* [emphasis added] be oriented to maximize sun exposure and passive heating during cool months and to provide shaded areas during warm months to help reduce the heat island effect.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context, existing conditions and the operational aspects of commercial and employment uses, including for very large buildings on employment lands;**
- Policy 12.7.2 (Formerly Policies 4.6.43 and 4.6.62) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We reiterate our comment that flexibility through encouragement language should be incorporated;**
- Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We reserve the opportunity to participate in the detailed review of the existing secondary plans;**
- Policy 22.4.1 states “The planning objectives for the Neighbourhood Centre designation are as follows: a) facilitate mid-rise forms of development...”. In our submission, **the Neighbourhood Centre designation should also consider the opportunity for high density (high-rise) forms of development**, in addition to mid-rise forms;
- Policy 22.4.3 f) states “Buildings as high as 10 storeys may be permitted.” In our submission, **the Neighbourhood Centre designation should also consider the opportunity for high density (high-rise) forms of development**, beyond 10 storeys. As noted by draft Policy 9.6.2, “The greatest heights and densities will be focused around the Urban and Neighbourhood Centres and along the Corridors”;
- Policy 23.5.2 a) (Formerly Policy 5.24.33) states “Accessory outdoor storage for the purposes of this policy is the outdoor storage of raw materials, finished materials and/or commodities that is accessory to the principal use of the property, with that principal use located within a building(s). **We reiterate our comment that**

- requesting clarification** that outdoor sales and display associated with a commercial use is not interpreted as outdoor storage and in our submission “New” should be added before “Outdoor Storage” in order to recognize existing outdoor storage that has been approved by the Town through site plan control; and
- Policy 24.5.1 states “The Town will require a comprehensive development plan to be incorporated into this Plan through an official plan amendment to provide detailed direction for defined areas within the Urban Area where the following elements from Schedule B1, Town Structure, are to be implemented: a) Urban Centres; b) Neighbourhood Centres; c) Urban Corridors; and, d) Knowledge and Innovation Corridors”. We seek clarification as to what a “defined area” is considered, and where that is established. **A comprehensive development plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.5.1 “will” be changed to “may” in order to provide clarity.** It is unclear as to why a comprehensive development plan is required for certain areas such as Neighbourhood Centres or Urban Corridors, in the context of the Town’s preparation of Secondary Plans for the Urban Areas. **We suggest that the requirement of a comprehensive development plan be reconsidered,** including how this layer of analysis may conflict with draft policy 9.6.2b) as it relates to the town’s intention to pre-zone lands to support intensification and expedite housing growth;
  - Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. Accordingly, we suggest **Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;** and
  - As a general comment, in our submission, **all defined terms under the Glossary should be italicized for ease of review.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Choice Properties REIT (Via Email)



**VIA EMAIL**

July 27, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – June 2023 Draft  
Preliminary Comments on Behalf of 8281 Healey Road GP Limited**  
**Our File: ONE/CAD/22-02**

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We are the planning consultants for 8281 Healey Road GP Limited (“One Properties”) for the Town of Caledon Official Plan Review. One Properties is the owner of approximately 13.56 ha (33.51 ac) of lands within the Town of Caledon (the “One Lands”), located at 8281 and 0 Healey Road.

The One Lands are subject to a current Site Plan Approval application for a warehouse building (Town file SPA 21-9). The One Lands were subject to a prior Zoning By-law Amendment application (Town File RZ 2020-0007), generally for the realignment of the environmental protection lands.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of One Properties, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review. On behalf of One Properties, we have preliminary comments as outlined below, and will continue to review the June 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule A1 Provincial Plan Areas, the One Lands are shown as Urban Area and Settlement Areas;
- On Schedule B1 Town Structure, the One Lands are shown as Urban Area with portions shown as Natural Environment System;
- On Schedule B2 Growth Management, the One Lands are shown as Designated Greenfield Area, and located within the Provincially Significant Employment Zone;
- On Schedule B4 Land Use Designations, the One Lands are partially shown as New Employment and “Refer to 1976 Official Plan”;
- On Schedule C1 Town Wide Transportation Network, the One Lands are shown within the Settlement Area, with frontage along Healy Road which is identified as



- a Town Arterial Road. A Conceptual Collector Road is identified to the west of the One Lands, in a north-south direction;
- On Schedule C2 Road Right-of-Way Widths, Healey is shown with a 36 m ROW (26 m ROW under current Official Plan);
  - On Schedule D1 Natural Environment System, the Natural Features and Areas and watercourse is shown along portions of the One Lands; and
  - On Schedule D3 Water Resources System Areas, areas of Highly Vulnerable Aquifers are shown within portions of the One Properties Lands.

As a general comment, the Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area (as the One Lands are considered), as no land use plan has been prepared for lands within the Urban System. A fulsome and informed review of the policies of Section F can therefore not be completed, as information is outstanding. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that Part F be withheld from consideration, or that land use schedules be prepared.

For the comments below, please note that the references to “Formerly Policy” refers to the Policies under the March 2022 Draft Official Plan. At this time, our preliminary comments for the June 2023 Draft Official Plan are as follows:

- **In general, we are concerned with the implications of the draft Official Plan policy framework for the One Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies;**
- **For Schedule C1 Town Wide Transportation Network, we seek clarification as to the intended alignment of the Conceptual Collector Road** located west of the One Lands;
- On Schedule C2 Road Right-of-Way Widths, Healey Road is shown with a 36 m ROW, whereas the in-effect Official Plan identifies a 26 m ROW. **We seek clarification as to the need for such a significant increase, and implications for existing developments;**
- For Schedule D1 Natural Environment System, Natural Features and Areas and Watercourse is shown along portions of the One Properties Lands. We reiterate our previous comment that **the extent of the Natural Environment System should be updated to reflect the development approvals obtained under the Zoning By-law Amendment application (RZ 2020-0007).** We note that similarly, **Schedule D2 Natural and Supporting Features and Areas should be updated as well;**
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **In our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application**

in order to recognize site specific context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage, change requirements” to “standards” and delete “to support compliance”;

- Policy 4.5.2 for Secondary Plans states “Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied.” **As a block plan may not be required in all circumstances, we suggest that “, where required,” be added after “is in place and”;**
- Policy 7.5.3 (Formerly Policy 4.3.40) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks (e.g., commercial, employment and institutional blocks), to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the One Lands);**
- Policy 7.8.2 states “New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing: ...”. **In our submission, “, where appropriate” should be added after “and reinforcing” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.8.6 (formerly Policy 4.3.38) states “Building servicing, as well as parking, access, loading, and waste collection areas, *will* [emphasis added] be incorporated into the building design, located away from sensitive land uses, and be separated and screened from view as required by the Town and applicable urban design guidelines.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.9.2 (formerly Policy 4.3.60) states “Where parking areas cannot be located below grade or behind buildings, at the discretion of the Town, *limited* [emphasis added] parking may be located at the side yard of the building but will incorporate a planted buffer and hard and soft landscaping treatments along the property line to address the pedestrian boulevard and mitigate views to at-grade parking.” **We reiterate our comment that the policy should provide for greater flexibility to account for use, site context and operational aspects;**
- Policy 7.9.4 (formerly Policy 4.3.56) states “Industrial building surface parking areas *will* [emphasis added] be located in rear yards or well-landscaped side yards with screening from public view.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects and to avoid rendering existing development as non-conforming;**
- Policy 7.9.9 (formerly Policies 4.3.58 and 4.3.70) states “A minimum tree canopy cover of 30 per cent *will* [emphasis added] be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws”. **We reiterate our comment that “will” should be**

changed to "should" in order to provide flexibility to account for site context and operational aspects;

- Policy 7.10.1 (Formerly Policy 4.3.42) states "Buildings, outdoor spaces and entrances of new and infill development *will* [emphasis added] be oriented to maximize sun exposure and passive heating during cool months and to provide shaded areas during warm months to help reduce the heat island effect." **We reiterate our comment that "will" should be changed to "should" in order to provide flexibility to account for site context, existing conditions and the operational aspects of commercial and employment uses, including for very large buildings on employment lands;**
- Policy 12.7.2 (Formerly Policies 4.6.43 and 4.6.62) states "All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces". **We reiterate our comment that flexibility through encouragement language should be incorporated since amenity spaces are not appropriate under all circumstances and in particular for private SWM ponds that are associated with employment lands development;**
- Policy 21.2.2 states "The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan." **We reserve the opportunity to participate in the detailed review of the existing secondary plans;**
- Policy 21.3.1 states "New and developing community and employment areas within the Town's new urban area will be subject to general land use designations until they undergo secondary planning in accordance with the growth phasing policies of Chapter 4, and other policies of this Plan. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System." **As noted above, in our submission, as the One Lands are subject to OPA 271 and are now within the Coleraine West Employment Area Secondary Plan, the entirety of the One Lands should be shown on Schedule B4 Land Use Designations as "Refer to 1976 Official Plan" as opposed to being designated New Employment Area;**
- Policy 23.5.3 Accessory Truck Parking describes the permissions for *truck parking* [emphasis added] as an accessory use, whereas Section 23.6 to 23.9 refers to *truck and trailer parking* [emphasis added]. **We seek clarification whether the two permissions are the same and we suggest the terminology be consistent throughout the document;**
- Policy 23.7.2 a) Prestige Employment Permitted Uses (Formerly 5.9) states "The following uses may be permitted within Prestige Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials.", whereas Policy 23.7.2 b) states "Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted." **We seek**

**clarification regarding the difference between *warehousing* and *large-scale warehousing* as the two uses are not defined;**

- Policy 23.7.2 b) Prestige Employment Permitted Uses (Formerly Section 5.9) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” Under the current Official Plan, the Prestige Industrial designation permits “Warehousing and wholesale operations”, whereby **there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the One Lands within the Prestige Industrial designation will be rendered non-conforming. We reiterate our comment that the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.7.3 a) states “The following discretionary uses may be permitted within the Prestige Employment designation: ...” **As many of the uses that are listed are indicated as “may be permitted” under Policy 23.7.2, we request clarification as to the policy intent;**
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 23.8.2 a) General Employment Permitted Uses (Formerly 5.10) states “The following uses may be permitted within General Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials.”, whereas Policy 23.7.2 b) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” **We seek clarification regarding the difference between *warehousing* and *large-scale warehousing* as the two uses are not defined;**
- Policy 23.8.2 b) General Employment Permitted Uses (Formerly 5.10) states “Large scale warehousing, goods movement and logistics uses will not be permitted.” Under the current Official Plan, the General Industrial designation permits “Warehousing and wholesale operations”, whereby **there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the One Lands within the Prestige Industrial designation will be rendered non-conforming. In our submission, the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.9.1 a) (Formerly 5.11.) states the planning objective of the Goods Movement District(s) is to “determine the location and extent of the district through the Trucking Strategy, to be completed by the Town” and 23.9.1.b states “provide long-term and stable locations for large scale warehousing, goods movement and logistics uses;” **We request clarification as to the implications for the One Lands where the Trucking Strategy has not been provided for review and the associated Goods Movement District has not yet been determined. In addition, based on our review there is no reference to the Trucking Strategy in Chapter 11 generally and in particular under Policies 11.6.1 to 11.6.11 (Formerly Policies 4.5.75 to 4.5.80) for Trucking and Goods Movement;**
- Policy 23.9.1 e) (Formerly Policy 5.11.9) states “Provide significant buffers from sensitive uses, roads and uses outside of the overlay area.” **In our submission, “Significant” should be deleted since it would be appropriate to determine the width of buffers through site specific studies;**

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- Policy 23.9.2 a) states “The following uses may be permitted within the Goods Movement District designation: i) all uses permitted under the General Employment designation; ii) large scale warehousing, goods movement and logistics uses; iii) major office uses and employment-supportive uses; and, iv) open storage, including the storage of containers and truck storage.” **We request clarification as to whether the Goods Movement District overlay removes uses that would otherwise be permitted in the underlying designation and that the Goods Movement District overlay (or “designation” as referenced in Policy 23.9.2 a)) will not be restricted to only the General Employment Areas designation as noted in the non-policy introduction to Section 23.9 (i.e., “Through the preparation of the required secondary plans, a Goods Movement overlay designation may be applied as an overlay on top of the General Employment Area designation”);**
  - Policy 24.4.1 states “Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town *will* [emphasis added] require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development” and Policy 24.4.2 states “Block plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town’s terms of reference. If a secondary plan includes the technical level of detail that would typically be included in a block plan, a separate block planning process *may not be required* [emphasis added], at the discretion of the Town.” **Similar to our comment for Policy 4.5.2, as a block plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.4.1 “will” be changed to “may” in order to provide clarity;**
  - Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. Accordingly, we suggest **Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;** and
  - As a general comment, in our submission, **all defined terms under the Glossary should be italicized for ease of review.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. 8281 Healey Road GP Limited (via email)



**VIA EMAIL**

July 27, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re:                   Town of Caledon Official Plan Review  
                      Future Caledon Official Plan – June 2023 Draft  
                      Preliminary Comments on Behalf of Rock Developments (Bolton  
                      Square Ltd. and 1732115 Ontario Inc.)**  
**Our File:         ROD/CAD/22-01**

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We are the planning consultants for Bolton Square Ltd. and 1732115 Ontario Inc. ("Rock Developments") for the Town of Caledon Official Plan Review. Rock Developments is the owner of approximately 2.25 ha (5.55 ac) of lands within the Town of Caledon (the "Rock Lands"), located at 405 Queen Street South.

The Rock Lands are currently developed as a single storey commercial retail plaza, and built with three existing buildings. Rock Developments has submitted a pre-consultation request to the Town, whereby it is their intent to comprehensively redevelop the Rock Lands for higher density purposes and a possible mix of residential/commercial uses.

As part of the Town's Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of Rock Developments, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review. On behalf of Rock Developments, we have preliminary comments as outlined below, and will continue to review the June 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule A1 Provincial Plan Areas, the One Lands are shown as Urban Area and Settlement Areas;
- On Schedule B1 Town Structure, the Rock Lands are shown as Urban Area and located along the Urban Corridor (Queen Street). The Rock Lands appear to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;
- On Schedule B2 Growth Management, the Rock Lands are shown as Built-Up Area and located along the Urban Corridor (Queen Street). The Rock lands appear to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;

- On Schedule B4 Land Use Designations, the Rock Lands are shown as “Refer to the 1976 Official Plan”;
- On Schedule C1 Town – Wide Transportation Network, the Rock Lands are located along a Regional Arterial Road (Queen Street); and
- On Schedule C2 Road Right-of-Way Widths, Queen Street South is shown with a 45 m ROW (not identified under current Official Plan).

As a general comment, the Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area (as the Rock Lands are considered), as no land use plan has been prepared for lands within the Urban System. A fulsome and informed review of the policies of Section F can therefore not be completed, as information is outstanding. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that Part F be withheld from consideration, or that land use schedules be prepared.

For the comments below, please note that the references below to “Formerly” refers to the Policies and Sections under the March 2022 draft Official Plan. At this time, our preliminary comments for the June 2023 Draft Official Plan are as follows:

- A Neighbourhood Centre has been identified on Schedules B1 and B2, and appears to be located in proximity to the Rock Lands. It appears as if the Neighbourhood Centre has been moved south from the March 2022 draft, and we seek clarification as to the proposed extent of the Neighbourhood Centre. We reiterate our previous comment that it is appropriate **to consider the Rock Lands as part of the Neighbourhood Centre**;
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **In our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage, change “requirements” to “standards” and delete “to support compliance”;**
- Policy 7.5.3 (Formerly Policy 4.3.40) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks (e.g., commercial, employment and institutional blocks), to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the Rock Development Lands);**



- Policy 7.8.4 states “Buildings of four storeys or greater will be designed with stepbacks on storeys above the fourth storey to achieve: a) a human-scaled ground floor; b) vistas or massing transition to heritage buildings and/or sites; and, c) built form transition to existing and planned surrounding development of a lower scale and intensity and form.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.8.6 (formerly Policy 4.3.38) states “Building servicing, as well as parking, access, loading, and waste collection areas, *will* [emphasis added] be incorporated into the building design, located away from sensitive land uses, and be separated and screened from view as required by the Town and applicable urban design guidelines.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.9.2 (formerly Policy 4.3.60) states “Where parking areas cannot be located below grade or behind buildings, at the discretion of the Town, *limited* [emphasis added] parking may be located at the side yard of the building but will incorporate a planted buffer and hard and soft landscaping treatments along the property line to address the pedestrian boulevard and mitigate views to at-grade parking.” **We reiterate our comment that the policy should provide for greater flexibility to account for use, site context and operational aspects;**
- Policy 7.9.3 (Formerly Policy 4.3.59) states “Residential and multi-unit residential buildings *will* [emphasis added] be designed with parking areas located below grade or behind the main front wall of the building. Parking between the building façade, or entrance, and the pedestrian boulevard *will* [emphasis added] not be permitted to ensure that the boulevard is defined by a continuous built form edge.” **We reiterate our comment that “will” should be changed to “should be” in order to provide flexibility to account for use, site context and operational issues and in recognition of Policy 7.9.2 (Formerly Policy 4.3.60), such as for the Rock Lands, which have public roads on 3 sides of the site;**
- Policy 7.9.7 states “For commercial sites where parking requirements are equal to or exceed 30 per cent of the net developable area of a site, at the discretion of the Town, overall site and parking area design will prioritize separated pedestrian access to/from the right-of-way, parking areas and building(s), and provide: ... c) internal streets, where appropriate, based on complete streets design standards to encourage pedestrian use.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and the operational aspects, since having internal streets based on complete streets may not be appropriate in all circumstances;**
- Policy 7.9.9 (formerly Policies 4.3.58 and 4.3.70) states “A minimum tree canopy cover of 30 per cent *will* [emphasis added] be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws”. **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational aspects;**
- Policies 4.3.58 and 4.3.70) states “A minimum tree canopy cover of 30 per cent *will* [emphasis added] be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws”.

- We reiterate our comment that "will" should be changed to "should" in order to provide flexibility to account for site context and operational aspects;**
- Policy 7.9.10 states "Truck and/or trailer parking, staging or loading areas *will* [emphasis added] not be located between the front elevation of a building and a public street and will be screened from the public realm." **In our submission, "will" should be changed to "should" in order to provide flexibility to account for site context, the operational aspects of commercial and employment uses and to avoid rendering existing development as non-conforming;**
  - Policy 7.10.1 (Formerly Policy 4.3.42) states "Buildings, outdoor spaces and entrances of new and infill development *will* [emphasis added] be oriented to maximize sun exposure and passive heating during cool months and to provide shaded areas during warm months to help reduce the heat island effect." **We reiterate our comment that "will" should be changed to "should" in order to provide flexibility to account for site context, existing conditions and the operational aspects of commercial and employment uses, including for very large buildings on employment lands;**
  - Policy 12.7.2 (Formerly Policies 4.6.43 and 4.6.62) states "All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces". **We reiterate our comment that flexibility through encouragement language should be incorporated;**
  - Policy 21.2.2 states "The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan." **We reserve the opportunity to participate in the detailed review of the existing secondary plans;**
  - Policy 22.4.1 states "The planning objectives for the Neighbourhood Centre designation are as follows: a) facilitate mid-rise forms of development...". In our submission, **the Neighbourhood Centre designation should also consider the opportunity for high density (high-rise) forms of development**, in addition to mid-rise forms;
  - Policy 22.4.3 f) states "Buildings as high as 10 storeys may be permitted." In our submission, **the Neighbourhood Centre designation should also consider the opportunity for high density (high-rise) forms of development**, beyond 10 storeys. As noted by draft Policy 9.6.2, "The greatest heights and densities will be focused around the Urban and Neighbourhood Centres and along the Corridors";
  - Policy 23.5.2 a) (Formerly Policy 5.24.33) states "Accessory outdoor storage for the purposes of this policy is the outdoor storage of raw materials, finished materials and/or commodities that is accessory to the principal use of the property, with that principal use located within a building(s). **We reiterate our comment that requesting clarification** that outdoor sales and display associated with a commercial use is not interpreted as outdoor storage and in our submission "New"

- should be added before “Outdoor Storage” in order to recognize existing outdoor storage that has been approved by the Town through site plan control; and
- Policy 24.5.1 states “The Town will require a comprehensive development plan to be incorporated into this Plan through an official plan amendment to provide detailed direction for defined areas within the Urban Area where the following elements from Schedule B1, Town Structure, are to be implemented: a) Urban Centres; b) Neighbourhood Centres; c) Urban Corridors; and, d) Knowledge and Innovation Corridors”. We seek clarification as to what a “defined area” is considered, and where that is established. **A comprehensive development plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.5.1 “will” be changed to “may” in order to provide clarity.** It is unclear as to why a comprehensive development plan is required for certain areas such as Neighbourhood Centres or Urban Corridors, in the context of the Town’s preparation of Secondary Plans for the Urban Areas. **We suggest that the requirement of a comprehensive development plan be reconsidered,** including how this layer of analysis may conflict with draft policy 9.6.2b) as it relates to the town’s intention to pre-zone lands to support intensification and expedite housing growth;
  - Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. Accordingly, we suggest **Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;**
  - As a general comment, in our submission, **all defined terms under the Glossary should be italicized for ease of review.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Rock Developments (via email)



**VIA EMAIL**

July 31, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – June 2023 Draft  
Preliminary Comments on Behalf of BoltCol Holdings North Inc. and  
BoltCol Holdings South Inc.**

**Our File: BCL/BOL/22-01**

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We are the planning consultants for BoltCol Holdings North Inc. and BoltCol Holdings South Inc. ("BoltCol") for the Town of Caledon Official Plan Review. BoltCol are the owners of approximately 100 ha (249 ac) of lands within the Town of Caledon (the "BoltCol Lands"), including:

- 8399 George Bolton Parkway;
- 8400 George Bolton Parkway;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 12210 Coleraine Drive;
- 12226 Coleraine Drive;
- 12258 Coleraine Drive;
- 12300 Coleraine Drive;
- 12366 Coleraine Drive;
- 12400 Coleraine Drive;
- 12480 Coleraine Drive;
- 12490 Coleraine Drive;
- 12592 Coleraine Drive;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 8410 Mayfield Road; and
- 8424 Mayfield Road.

The BoltCol Lands are at various stages of approval for employment uses. With the completion of approvals for six buildings to the north and south of the extension of George Bolton Parkway, the focus has turned to the southern portion of the BoltCol Lands down to Mayfield Road, including the approximately 32.3 ha (79.8 ac) vacant portion of the Boltcol Lands, known as the “Boltcol Triangle Lands”, which were recently subject to the Town-initiated OPA 271 and the associated implementing zoning under By-law 2023-054, which are now both in full force and effect.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of BoltCol, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review. On behalf of BoltCol, we have preliminary comments as outlined below, and will continue to review the June 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the June 2023 Draft Official Plan:

- On Schedule A1 Provincial Plan Areas, a portion of the BoltCol Lands on Mayfield Road in the southwest corner is shown within a Protected Transportation Corridor (related to the GTA West Study area);
- On Schedule B1 Town Structure, the BoltCol Lands are predominantly shown as Urban Area with portions shown as Natural Environment System. A portion of the lands on Mayfield Road in the southwest corner is shown as Protected Transportation Corridor (related to the GTA West Study area);
- On Schedule B2 Growth Management, the BoltCol Lands are predominantly shown as Designated Greenfield Area. The entirety of the BoltCol Lands are located within the Provincially Significant Employment Zone;
- On Schedule B4 Land Use Designations, the BoltCol Lands are shown as “Refer to 1976 Official Plan” with the exception of the Triangle Lands, which are shown as New Employment Area and Protected Transportation Corridor (related to the GTA West Study area);
- On Schedule C1 Town Wide Transportation Network, the BoltCol Lands are shown within the Settlement Area with an east-west Conceptual Collector Road extending west from George Bolton Parkway, along with a Conceptual Collector Road extending from Mayfield Road generally to the west of the BoltCol Lands;
- On Schedule C2 Road Right-of-Way Widths, Coleraine Drive is shown with a 36 m ROW (36 m ROW under current Official Plan), Mayfield Road is shown with a 50 m ROW (50 m ROW under current Official Plan) and George Bolton Parkway is shown as Local Road, whereby no changes are proposed;
- On Schedule D1 Natural Environment System, the Natural Features and Areas and Watercourse are shown through portions of the BoltCol Lands;
- On Schedule D2 Natural and Supporting Features and Areas, Unevaluated Wetlands are shown on portions of the watercourses shown on the BoltCol Lands; and
- On Schedule D3 Water Resources System Areas, areas of Highly Vulnerable Aquifers are shown within portions of the BoltCol Lands.

For the comments below, please note that the references to “Formerly Policy” refers to the Policies under the March 2022 Draft Official Plan. At this time, our preliminary comments for the June 2023 Draft Official Plan are as follows:

- **We reiterate our general comments from April 19, 2022: We are concerned with the implications of the draft Official Plan policy framework for the BoltCol Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies;**
- As a general comment, the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that Part F be withheld from consideration, or that land use schedules be prepared;
- For Schedule C1 Town Wide Transportation Network, **we request clarification that that the Collector Road extending from Mayfield Road is located to the west of the BoltCol Lands, which would correspond with OPA 271, where there are no Collector Roads planned south of the George Bolton Parkway extension through the BoltCol Lands;**
- For Schedules D1 Natural Environment System, Natural Features and Areas and Watercourse are shown along portions of the BoltCol Lands. We reiterate our previous comment that **the extent of the Natural Environment System for the BoltCol Lands should be updated to reflect the development approvals obtained under Site Plan Approval thus far** (e.g., portions of the Natural Environment System shown for the most northern portion of the BoltCol Lands were revised with a channel to the north of the BoltCol Lands shared with the adjacent land owner). We note that similarly, **Schedule D2 Natural and Supporting Features and Areas should be updated as well;**
- Policies 1.2.3 and 21.2.1 state “The 1976 Town of Caledon Official Plan, as amended, remains in effect as it applies to: a) lands identified as Rural Service Centre on Schedule A1 to the 1976 Official Plan, as amended, including: i) the Bolton settlement area and associated secondary plan areas (Bolton Core, Bolton South Hill, West Bolton, North East Bolton, South Simpson Industrial and Coleraine West) as depicted on Schedules C, C-1, C-1A, C-2, C-3, C-4, C-5, C-6, and C-7 to the 1976 Official Plan, as amended”. Policy 1.2.4 states “The Future Caledon Official Plan applies a separate policy framework and land use pattern town-wide, except where the 1976 Town of Caledon Official Plan, as amended, remains in effect. a) References to, or depictions of, lands subject to the 1976 Official Plan, as amended, are provided for the purpose of information and context only. b) References to town-wide population and employment forecasts in this Plan include estimates for lands subject to the 1976 Official Plan, as amended. c) For clarity, Part B, Managing Growth and Change, and Part G, Implementation, of this Plan apply to all lands in the Town of Caledon.” **In our submission, as the Triangle Lands are subject to OPA 271, the entirety of the BoltCol Lands should be shown on Schedule B4 Land Use Designations as “Refer to 1976 Official Plan”;**
- Policy 4.5.2 for Secondary Plans states “Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and

- the subsequent block plan requirements of this Plan have been satisfied.” **As a block plan may not be required in all circumstances, we suggest that “, where required,” be added after “is in place and”;**
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **In our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;**
  - Policy 7.5.3 (Formerly Policy 4.3.40) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks (e.g., commercial, employment and institutional blocks), to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the BoltCol Lands);**
  - Policy 7.8.2 states “New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing: ...”. **In our submission, “, where appropriate,” should be added after “and reinforcing” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 7.8.4 states “Buildings of four storeys or greater will be designed with stepbacks on storeys above the fourth storey to achieve: a) a human-scaled ground floor; b) vistas or massing transition to heritage buildings and/or sites; and, c) built form transition to existing and planned surrounding development of a lower scale and intensity and form.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 7.8.6 (formerly Policy 4.3.38) states “Building servicing, as well as parking, access, loading, and waste collection areas, *will* [emphasis added] be incorporated into the building design, located away from sensitive land uses, and be separated and screened from view as required by the Town and applicable urban design guidelines.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 7.9.2 (formerly Policy 4.3.60) states “Where parking areas cannot be located below grade or behind buildings, at the discretion of the Town, *limited* [emphasis added] parking may be located at the side yard of the building but will incorporate

- a planted buffer and hard and soft landscaping treatments along the property line to address the pedestrian boulevard and mitigate views to at-grade parking.” **We reiterate our comment that the policy should provide for greater flexibility to account for use, site context and operational considerations;**
- Policy 7.9.4 (formerly Policy 4.3.56) states “Industrial building surface parking areas *will* [emphasis added] be located in rear yards or well-landscaped side yards with screening from public view.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations and to avoid rendering existing development as non-conforming;**
  - Policy 7.9.9 (formerly Policies 4.3.58 and 4.3.70) states “A minimum tree canopy cover of 30 per cent *will* [emphasis added] be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws”. **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 7.10.1 (Formerly Policy 4.3.42) states “Buildings, outdoor spaces and entrances of new and infill development *will* [emphasis added] be oriented to maximize sun exposure and passive heating during cool months and to provide shaded areas during warm months to help reduce the heat island effect.” **We reiterate our comment that “will” should be changed to “should” in order to provide flexibility to account for site context, existing conditions and the operational considerations of commercial and employment uses, including for very large buildings on employment lands;**
  - Policy 7.10.3 (Formerly Policy 4.3.36) states “Development adjacent to parks, woodlots, and watercourses will sensitively address these features through appropriate setbacks and building design. Where appropriate, the design of buildings will maximize overlook and passive surveillance opportunities on trails, parks and open spaces.” **We reiterate our we request for clarification as to whether the intent of the policy is to include to employment lands development, which would not be appropriate in the context of the policy. We suggest that clarity be provided, whereby “residential” could be added after “Where proposed ...”;**
  - Policy 12.7.2 (Formerly Policies 4.6.43 and 4.6.62) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We reiterate our comment that flexibility through encouragement language should be incorporated since amenity spaces are not appropriate under all circumstances and in particular for private SWM ponds that are associated with employment lands development;**
  - Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We**



**reserve the opportunity to participate in the detailed review of the existing secondary plans;**

- Policy 21.3.1 states “New and developing community and employment areas within the Town’s new urban area will be subject to general land use designations until they undergo secondary planning in accordance with the growth phasing policies of Chapter 4, and other policies of this Plan. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System.” **As noted above, in our submission, as the Triangle Lands are subject to OPA 271 and are now within the Coleraine West Employment Area Secondary Plan, the entirety of the BoltCol Lands should be shown on Schedule B4 Land Use Designations as “Refer to 1976 Official Plan” as opposed to being designated New Employment Area;**
- Policy 23.5.3 Accessory Truck Parking describes the permissions for *truck parking* [emphasis added] as an accessory use, whereas Section 23.6 to 23.9 refers to *truck and trailer parking* [emphasis added]. **We seek clarification whether the two permissions are the same and we suggest the terminology be consistent throughout the document;**
- Policy 23.7.2 a) Prestige Employment Permitted Uses (Formerly 5.9) states “The following uses may be permitted within Prestige Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials.”, whereas Policy 23.7.2 b) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” **We seek clarification regarding the difference between warehousing and large-scale warehousing as the two uses are not defined;**
- Policy 23.7.2 b) Prestige Employment Permitted Uses (Formerly Section 5.9) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” Under the current Official Plan, the Prestige Industrial designation permits “Warehousing and wholesale operations”. **There is a concern as to the continued permissions for warehousing and that existing warehousing operations on the BoltCol lands within the Prestige Industrial designation will be rendered non-conforming. We reiterate our comment that the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.7.3 a) states “The following discretionary uses may be permitted within the Prestige Employment designation: ...” **As many of the uses that are listed are indicated as “may be permitted” under Policy 23.7.2, we request clarification as to the policy intent;**
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **In our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
- Policy 23.8.2 a) General Employment Permitted Uses (Formerly 5.10) states “The following uses may be permitted within General Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials.”, whereas Policy 23.7.2 b) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” **We seek**

clarification regarding the difference between *warehousing* and *large-scale warehousing* as the two uses are not defined;

- Policy 23.8.2 b) General Employment Permitted Uses (Formerly 5.10) states “Large scale warehousing, goods movement and logistics uses will not be permitted.” Under the current Official Plan, the General Industrial designation permits “Warehousing and wholesale operations”. **There is a concern as to the continued permissions for warehousing and that existing warehousing operations on the BoltCol lands within the Prestige Industrial designation will be rendered non-conforming. In our submission, the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.8.4 b) states “Salvage and recycling operations, concrete batching plants and asphalt plants, open storage uses, contractor’s facilities are not to be located on a corner lot where one road is an arterial road, Regional Road or Provincial Highway” and Policy 23.8.4 d) states “Outdoor storage associated with a permitted use will only be permitted in the interior and rear yards only.” **In our submission, “open storage uses” should be deleted from 23.8.4 b), since it would be possible for open storage to be located on a corner lot within the interior and rear yards only;**
- Policy 23.9.1 a) (Formerly 5.11.) states the planning objective of the Goods Movement District(s) is to “determine the location and extent of the district through the Trucking Strategy, to be completed by the Town” and 23.9.1.b states “provide long-term and stable locations for large scale warehousing, goods movement and logistics uses;” **We request clarification as to the implications for the BoltCol Lands where the Trucking Strategy has not been provided for review and the associated Goods Movement District has not yet been determined. In addition, based on our review there is no reference to the Trucking Strategy in Chapter 11 generally and in particular under Policies 11.6.1 to 11.6.11 (Formerly Policies 4.5.75 to 4.5.80) for Trucking and Goods Movement;**
- Policy 23.9.1 e) (Formerly Policy 5.11.9) states “Provide significant buffers from sensitive uses, roads and uses outside of the overlay area.” **In our submission, “Significant” should be deleted since it would be appropriate to determine the width of buffers through studies as part of site plan approval;**
- Policy 23.9.2 a) states “The following uses may be permitted within the Goods Movement District designation: i) all uses permitted under the General Employment designation; ii) large scale warehousing, goods movement and logistics uses; iii) major office uses and employment-supportive uses; and, iv) open storage, including the storage of containers and truck storage.” **We request clarification as to whether the Goods Movement District overlay removes uses that would otherwise be permitted in the underlying designation and that the Goods Movement District overlay (or “designation” as referenced in Policy 23.9.2 a)) will not be restricted to only the General Employment Areas designation as noted in the non-policy introduction to Section 23.9 (i.e., “Through the preparation of the required secondary plans, a Goods Movement overlay designation may be applied as an overlay on top of the General Employment Area designation”); and**
- Policy 24.4.1 states “Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town *will* [emphasis added] require

a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development” and Policy 24.4.2 states “Block plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town’s terms of reference. If a secondary plan includes the technical level of detail that would typically be included in a block plan, a separate block planning process *may not be required* [emphasis added], at the discretion of the Town.” **Similar to our comment for Policy 4.5.2, as a block plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.4.1 “will” be changed to “may” in order to provide clarity; and**

- As a general comment, in our submission, **all defined terms under the Glossary should be italicized for ease of review.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Jonathan Rodger, MScPI, MCIP, RPP  
Principal Planner

cc. BoltCol Holdings North Inc. and BoltCol Holdings South Inc. (Via Email)  
Pitman Patterson, Borden Ladner Gervais LLP (Via Email)

August 1<sup>st</sup>, 2023

Ms. Bailey Loverock  
Team Lead, Official Plan Review  
Senior Planner  
TOWN OF CALEDON  
6311 Old Church Rd  
Caledon, ON L7C 1J6

Dear Ms. Loverock

**Comments to Town of Caledon – New Official Plan and Secondary Plan Review  
54, 65 Mill Street, 49, 67, 75 King St East and 21, 27, 34 Elm Street known collectively as  
the “Subject Lands” - Queenscorp (Mill Street) Inc.**

Queenscorp (Mill Street) Inc. is the owner of several properties located in the Village of Bolton, in the Town of Caledon which includes the following municipal addresses 54, 65 Mill Street, 49, 67, 75 King Street East and 21, 27, 34 Elm Street herein collectively referred to as the “Subject Lands”. The Subject Lands are located east of Hwy 50, south of the Humber River and north of King Street E. A few of the properties in the Subject Lands contain single family residences which are either occupied or currently remain vacant. The properties known as 49 King Street E and 34 Mill Street are vacant lots.

The Subject Lands are located in the Bolton Heritage Conservation District and in the Bolton Secondary Plan Area per the draft Official Plan. It is our intention to redevelop the Subject Lands with a mix of housing types primarily townhouses and mid-rise built forms and relation to such, we have reviewed the Future Caledon Official Plan dated June 2023 (Draft) as well as the Proposed Terms of Reference for the Bolton Secondary Plan Review presented to Planning and Development Committee on May 16, 2023, and Town Council on May 23, 2023, and have a number of concerns and comments which are outlined below.

## **FUTURE CALEDON OFFICIAL PLAN – DRAFT (JUNE 2023)**

### **Greenbelt Designation in Town Structure**

Section 1.4.5 (a) of the Future Caledon Official Plan (herein FCOP) states that “*locations of boundaries and symbols are approximate and do not define exact limits except where they coincide with well-defined physical features such as roads, railways, and watercourses*”. Furthermore, Section 1.4.5(b) states that the delineation of natural features or the location of boundaries of environmental designations are not intended to be precise and may be further refined through additional study. While we can appreciate the flexibility of such language, we are concerned given that the Subject Lands are now shown to be part of the Greenbelt Plan and within the Natural Environment System as illustrated on Schedule B1. The Subject Lands were never identified as forming part of the Greenbelt Plan in the current Official Plan, and the policies which are associated with same would be unnecessarily onerous and prohibit development and site alteration. We seek to clarify that the mapping is only intended to reflect the publicly owned Urban



## 14. Mark Bozzo

River Valley and that no further land requirements or development constraints are intended by this mapping.

In particular, Schedules B1, B3, D1, D2, Section 9.9.7, Section 10.2.9, Section 10.3.3, Section 12.7.12, Section 13.2.1, Sections 13.4.1-13.4.3 and Table D1 will need to be revisited. Furthermore, there is an incongruence with Figure D1, which shows the Subject Lands outside of the Greenbelt Plan - Key Natural Heritage and Key Hydraulic Features area while other Schedules shown them within the Plan. In short, we require clarity in this regard.

Schedule B3 shows an Urban River Valley designation of the Humber River adjacent to the Subject Lands. Once again, clarity is required in the FCOP as to what is permitted on privately owned lands adjacent to this particular designation.

### **Urban Corridor**

It is our understanding that Urban Corridor designation is intended to be applied to the lands conceptually shown as Urban Corridors on Schedule B1 and B2 of the FCOP, which policies can be found in Section 22.5. These Urban Corridors are to connect neighborhoods and are mixed-use, mid-rise communities that support quality urban living environments which are connected to transit services and cycling infrastructure. Permitted uses will include retail, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses. Medium and high-density residential uses are also permitted.

That said, it is unclear as to why downtown Bolton was excluded from the Urban Corridor given the commercial nature of the area. We suspect the Town would like to see a broad range of uses in this location to allow for easy access to community daily needs of its residents. Furthermore, Urban Corridors provide a range and mix of activities that meet the needs of residents living within Corridors and within surrounding neighbourhoods. These corridors are intended to play a major role in providing opportunities for compact forms of development. How is this different from the Bolton downtown area?

### **Transportation - Right of Ways**

Schedule C2 of the FCOP identifies Mill, Elm, and Chapel Streets with a right-of-way width of 20m. Section 11.3 speaks to the Town's road network and the characteristics of these streets. The proposed width of 20m appears to be excessive given the nature of these streets and their location in the historic district. Additionally, Queen Street/Hwy 50 in this location is also shown to have a 20m width. The nature of Queen Street/Hwy 50 is arguably very different than the planned function of smaller local streets. Pedestrian connections, public transportation, streetscape elements, and natural and cultural heritage features along local streets will be unique to these roadways. We also identified a discrepancy between Schedule C1 and C2 regarding Humber Lea Road. Schedule C1 identifies Humber Lea Road as a collector, while Schedule C2 fails to assign a proposed Right of Way (ROW) width. Can staff please explain why a ROW is not assigned to this collector? We respectfully suggest that these schedules be revisited as they pertain to the Subject Lands and its surrounding street network.

### **Downtown Bolton**

Policies relating to the Downtown Bolton designation have not yet been developed. We look forward to reviewing them as part of this process.

### **Special Policy Area**

The Subject Lands form part of the Special Policy Area which can be found in both the existing Official Plan and the FCOP. Section 16.2.3 policies are broad-based and provide no direction for future development in such areas. We anticipate there will be further direction in the Bolton Secondary Plan in this regard.

### **Water Resources Systems Area**

A portion of the Subject Lands is within the Highly Vulnerable Aquifer designation on Schedule D3. The Subject lands were not previously identified within a Highly Vulnerable Aquifer in the current Official Plan. The Oak Ridges Moraine Conservation Plan identifies Reference Map for Ontario Regulation 140/02 dated March 2002 as the basis for determining areas of high aquifer vulnerability. Please demonstrate why the designation has changed. The definition of Aquifer is yet to be determined; however, we are unclear as to which policies apply given that they are mostly associated with the Oak Ridges Moraine Conservation Plan. The Subject lands are not within such Plan. Table D1 also identifies Highly Vulnerable Aquifers as a key hydraulic area however, we require further clarification as to how this will impact any future redevelopment.

### **BOLTON SECONDARY PLAN TERMS OF REFERENCE (MAY 2023)**

We have reviewed the Terms of Reference relating to the Bolton Secondary Plan and have the following recommendations to be included in the Study:

- Review local roads and their planned purpose (i.e., widths, connectivity, capacity, function, streetscapes, etc.)
- Study opportunities for intensification within the historic centre of Bolton. Look at various built forms to accommodate both the existing and future community and support local businesses in the central area. Planned growth along Queen Street south of the rail line seems shortsighted given the opportunity to augment economic vitality in the existing downtown area.
- Land uses in this area need to address future development which reflects a variety of housing types, as well as have consideration for the existing commercial/retail uses along Queen Street/Highway 50.
- Revisit heritage policies to allow for growth and intensification while still maintaining the historical character of the area. Growth is inevitable.

- Clearly identify Environmental Policy areas such as the boundaries for the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Natural Heritage System, Urban River Valley areas, Natural Heritage System of the Growth Plan for the Greater Golden Horseshoe in the Bolton Secondary Plan Schedules to in order to avoid inconsistencies (see previous remarks).

### **Implementation Matters**

How will the policies of the new Official Plan dovetail with the proposed Bolton Secondary Plan for applicability and interpretation purposes?

We appreciate the hard work that has been completed to-date, and the opportunity to provide our feedback. While we believe there are a number of areas which need further clarification, guidance and review, we are also confident that the final documents will achieve optimal results for the Town and the Province, while responding to future growth.

Please do not hesitate to contact the undersigned, should be you wish to discuss these matters further. In the meantime, we look forward to having meaningful discussions with staff and receiving future drafts of the FCOP and the Bolton Secondary Plan.

Kind regards,  
**Queenscorp (Mill Street) Inc.**

A handwritten signature in black ink, appearing to read 'Mark Bozzo', with a large, stylized flourish at the end.

Mark Bozzo  
President | CEO

August 1, 2023

Town of Caledon  
6311 Old Church Rd  
Caledon, ON L7C 1J6

Attention: Bailey Loverock, RPP  
Team Lead, Official Plan Review

**Re: Comments on Draft Future Caledon Official Plan  
Alloa Landowners Group**

On behalf of the Alloa Landowners Group, we are pleased to provide the enclosed comments on the Draft Future Caledon Official Plan. As you may know, the Alloa Landowners Group control the majority of lands bounded by the Highway 413 Corridor to the north and west, Chinguacousy Road to the east, and Mayfield Road to the south.

Further to the comments enclosed as Attachment 1, we wish to emphasize our request for policies that allow joint initiation of a secondary planning process with landowners and/or landowner groups. We also advise that under the Planning Act, the Town cannot prevent a party from filing a privately initiated application to amend the Official Plan (ie. to establish a Secondary Plan). Such policies should be revised to ensure it does not conflict with the Planning Act.

With regard to the design-related policies, we suggest that the Town avoid policies which restrict building height in the Official Plan to provide greater flexibility to implement appropriate building sizes in appropriate locations which respond to market conditions. If required, we suggest that restrictions on building height be established through future Secondary Plan policies after the opportunity to review appropriate built form and density is undertaken on a Secondary Plan Area basis.

With regard to Secondary Plan requirements, given that the Town will now be introducing Block Plan planning, there are several studies identified as Secondary Plan requirements which are more appropriately undertaken at the Block Plan Stage. Phasing Plans and Urban Design Guidelines are such documents which are premature to undertake and establish at the Secondary Plan level and can prolong the length of time it takes to complete the Secondary Plan process. These studies are more appropriate at the Block Plan stage after more details on the framework of the community are determined through the background environmental and engineering work. We further request that flexibility be given to allow Block Plans to be approved and/or established outside of an OPA process.

In addition to the above, we kindly request that the Town review and consider our detailed comments attached herein as Attachment 1 prior to releasing the 2<sup>nd</sup> draft of the Future Caledon Official Plan.

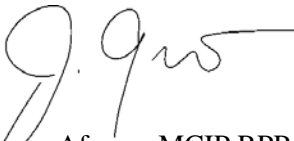


We wish to commend Town staff and Town consultants for their hard work on preparing the draft document and we appreciate being able to participate in the constructive and cooperative public consultation process.

Thank you for giving us the opportunity to provide comments on the Draft Official Plan. We look forward to reviewing the forthcoming document update. Please feel free to contact the undersigned if you have questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Jason Afonso, MCIP RPP  
Partner  
encl.

c. Alloa Landowner Group

Attachment 1 – Comments on June 2023 DRAFT Future Caledon Official Plan

SECTION NO.	POLICY	COMMENT
1.4 How to Read this Plan		
1.4.4	d) Council may approve guidelines or guidance documents that further support the implementation and interpretation of this Plan.	Consideration should be given to allow Guidelines (ie. Community Design Plans) to be approved by/at the staff/management level without the need for Council Approval/Endorsement. Guidelines approved at the staff level should carry the same weight as those which may be approved by Council. Consider replacing “Council” with “The Town”.
1.4.7	Minor deviations from numerical requirements in this Plan may be permitted by Council without the need for an official plan amendment, subject to applicable Provincial and Regional policies, provided that the general intent of this Plan is maintained.	It does not make sense to engage Council to determine the extent to which one may deviate from a numerical requirement. The flexibility to deviate without the need for amendment is a matter normally dealt with through consultation with Town staff/management. We recommend managing this matter through the Town's Preliminary Meeting / DART Process. Consider replacing “Town Council” with “the Town” or remove “by Council” altogether.
4.5 Secondary Plans		
4.5.1	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.	We request that consideration be given to allowing a joint initiation of a secondary planning process with landowners and/or landowner groups. We request that this policy be revised to add “Where a landowner or landowner group has expressed an interest to initiate the secondary planning process, the Town may initiate a secondary planning process jointly with the landowner or landowner group”
4.5.2	Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused.  Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.	We request that consideration be given to allow applicants to submit development applications while block plans are being advanced as they serve to inform the Block Plan process however, the approval may be withheld until the Block Plan is approved.

## 15. Jason Afonso

4.5.3	Privately initiated secondary plans will not be permitted.	This policy is too restrictive. Under the Planning Act, the Town cannot prevent a party from filing a privately-initiated Application for an Amendment to the Official Plan (ie. to establish a Secondary Plan). As such, this policy is inconsistent with the Planning Act. We believe it is the Town's intent to not support a privately-initiated Secondary Plan. We suggest that this policy be revised to state "A privately-initiated Official Plan Amendment to establish a Secondary Plan will generally not be supported, however, Council shall have the discretion to allow privately-initiated Official Plan Amendments to establish Secondary Plans or parts of a Secondary Plan on a site by site basis".
4.5.4	Each secondary planning process will be initiated and led by the Town in accordance with the policies of this Plan, the Region of Peel Official Plan, and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities.	We request that consideration be given to allowing jointly-initiated and jointly-led secondary planning process with landowners and/or landowner groups. We request the second sentence of this policy be revised to read "As appropriate, the Town may consider a hybrid or joint Secondary Plan planning process with owner(s) and/or developer(s) in the development of Terms of Reference, preparation of supporting studies and concept plans, meetings and consultations. In this instance, a Terms of Reference may be required to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.
4.5.7	In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region's satisfaction.	What is the basis for triggering a 10,000-unit threshold for local transit system planning. With the Region dissolved in the near future, the local transit system will have to be planned by the Town to the Town's own satisfaction. We request that the policy be revised to state that a Secondary Plan should address how best to accommodate the local transit network as part of the secondary planning exercise.
<b>5. Climate Change</b>		
5.1	<p>The planning objectives for climate change mitigation and adaptation are as follows:</p> <p>b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town's Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;</p>	Using the word 'requiring' is too onerous/restrictive. We request it be changed to 'encouraging' or at minimum, use the same term that is used in the PPS.
5.2.4	The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal <b>renewable</b> energy installation and district and other low carbon energy systems.	With no Terms of Reference is available, this may be problematic. We request, where in each instance the Official Plan refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.

## 15. Jason Afonso

		The references to solar and geothermal seem too specific for an OP as it does not allow for new and emerging technologies. We request that the reference to solar and geothermal be replaced with 'renewable'
5.4.1	The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.	Same as above.
<b>7. Design</b>		
7.2.7	New streets in subdivisions will align in a grid pattern to create pedestrian-scaled development blocks to ensure connectivity and active transportation.	We request "grid" pattern be revised to "modified grid pattern" to recognize implementation limitations such as intersection spacing requirements on major roads, topography, natural heritage system constraints etc.
7.2.8	Along collector and arterial roads, reverse frontage lots will be strongly discouraged. Outside of these areas, reverse residential lots will incorporate the use of window streets and incorporate substantial landscape buffers and treatments to address streetscape views along pedestrian and/or cycling areas on collector and arterial roads.	This policy is not clear. Why would reverse residential lots require window streets? Window streets prevent the implementation of reverse frontage lots. Consider revising the policy to identify circumstances where a window street might be appropriate ie. adjacent to open space areas, adjacent to major noise sources such as arterial and collector roads, 400-series highways and railways to mitigate noise impacts without the need for barriers, or where direct frontage or double/dual frontage built form is not practical.
7.8.4	Buildings of <del>four storeys or greater than 6 storeys</del> <b>will</b> <del>may</del> be designed with stepbacks <del>on storeys above the fourth storey</del> <b>on storeys above the fifth storey</b> to achieve:  a) a human-scaled ground floor; b) vistas or massing transition to heritage buildings and/or sites; and, c) built form transition to existing and planned surrounding development of a lower scale and intensity and form.	We believe this policy is intended for buildings of five storeys or greater since the step-back is to occur above the fourth storey. Notwithstanding, this policy is too restrictive and does not allow for massing variety. This policy means every single building constructed in the Town will need to be stepped back at the 5th level. This is not an appropriate way to regulate design and such massing should be considered on a site-by-site basis. We request that this policy be revised to state "Buildings greater than 6 storeys may be designed with stepbacks on storeys above the fifth storey to achieve...."  We suggest greater than 6 storeys since stepping a 4-storey building which reduces GFA makes the project unprofitable.
7.9.9	A minimum tree canopy cover of 30 per cent will be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws.	What is the scientific/environmental basis for applying 30% tree canopy to parking lots and site area respectively? We request the Town's justification or analysis before this policy is approved.

15. Jason Afonso

7.10.2	All new developments should contribute to the overall tree canopy of the Town by achieving a minimum 30 per cent canopy coverage on the net developable area of the site, at the discretion of the Town. Canopy coverage is to be assessed as defined by the Town Wide Design Guidelines and Green Development Standards.	Same as above. This needs to include ALL trees in a development proposal (ie. Street trees, parks, SWM, channels).
<b>8. Economic Opportunities</b>		
8.2.7	Conversions of lands within Employment Areas to non-employment uses such as Major Retail, residential, and other sensitive land uses not ancillary to the primary employment use will not be permitted.	This policy is too restrictive and inconsistent with the PPS on employment land conversions. This policy cannot outright prohibit employment land conversions when the PPS sets out a process to do so.
<b>9. Housing</b>		
9.1	b) maintain and develop purpose-built rental housing through a minimum target of 25 per cent of all new units to be rental in tenure.	This policy can't be supported without understanding how the Town determined the 25% threshold for requiring purpose built rental units for all new units. We recommend including a policy about how the Town will incentivise and achieve this. We request that the Town emphasize through policy that this is Town-wide and not on a "per site" basis. The OP should speak to where this will be emphasized to achieve the Town-wide target.
9.3.3	b) To support the diversification of the housing stock, the Town will work with the Region to:  i) achieve a target of 50 per cent of all new residential units to be in a form other than single and semi-detached housing in strategic growth areas identified in Part B and Schedule A1 of this Plan;	This policy can't be supported without understanding how the Town determined 50% of all future units to be in the form other than single detached units.
9.5.1	To support the diversification of housing tenure, the Town will work with the Region to implement the target that a minimum of 25 per cent of all new housing developments be purpose built rental housing.	Same as 9.1
9.9.6	b) Low density residential development applications within or abutting strategic growth areas will aim to provide at least 50 per cent of new single, semi-detached and townhouses with occupancy-ready additional residential units in order to contribute to rental housing stock.	This is problematic to implement for semis and townhouses since the 50% threshold cannot be achieved due to the design nature of these units and Town side yard setback requirements. This policy should only apply to singles.  Also, what is intended by occupancy-ready? This term should be defined in the Glossary.

9.10.4	<p>a) A residential unit will be considered attainable if it meets the following criteria:</p> <p>iii) it was developed as part of a prescribed development or class of developments;</p>	What does this mean? What is a prescribed development or class of developments?
9.11.1	The Town will implement a series of Green Development Standards in collaboration with community partners, development groups, and the Region to work towards the climate change objectives outlined in Chapter 5, Climate Change, of this Plan. All proposed housing developments will subject to review based on these standards.	Typo: will be subject

11. Transportation

11.3.7	Table C1	8.0-metre Public Lanes should be added to the table.																											
11.3.15	Table C2	<p>Daylight triangle standards are more appropriate within an Engineering Standards document. If the Town insists on including this in the Official Plan, the table should specify where daylight <u>roundings</u> would be required versus daylight <u>triangles</u>. Rear lane intersection daylighting requirements should also be listed. Note there is duplication of the Collector Road to Collector Road standard. Also, we find some of the standards to be excessive for communities which are intended to be compact. Oversized daylight triangles result in excessive side yards for lots abutting the daylight triangle as the triangle consumes a significant amount of lot frontage. This also results in poor built form articulation of the intersection. We request the Town consider the following:</p> <table><tr><th>Intersection</th><th>Land Dedication</th><th>Dimensions</th></tr><tr><td>Public Lane to Local or Collector Road</td><td>Triangle</td><td>2.5 metres by 2.5 metres</td></tr><tr><td>Local Road to Local Road</td><td><b><u>Rounding</u></b></td><td>5 metres by 5 metres</td></tr><tr><td>Local Road to Collector Road</td><td><b><u>Rounding</u></b></td><td>7.5 metres by 7.5 metres</td></tr><tr><td>Collector Road to Collector Road</td><td>Triangle</td><td><b>7.5 metres by 7.5 metres</b></td></tr><tr><td>Local Road to Arterial Road</td><td>Triangle</td><td><b>10 metres by 10 metres</b></td></tr><tr><td>Collector Road to Arterial Road</td><td>Triangle</td><td><b>10 metres by 10 metres</b></td></tr><tr><td>Arterial Road to Arterial Road</td><td>Triangle</td><td>15 metres by 15 metres</td></tr><tr><td>Any Town Road intersecting a Regional Road</td><td>Triangle</td><td>15 metres by 15 metres</td></tr></table>	Intersection	Land Dedication	Dimensions	Public Lane to Local or Collector Road	Triangle	2.5 metres by 2.5 metres	Local Road to Local Road	<b><u>Rounding</u></b>	5 metres by 5 metres	Local Road to Collector Road	<b><u>Rounding</u></b>	7.5 metres by 7.5 metres	Collector Road to Collector Road	Triangle	<b>7.5 metres by 7.5 metres</b>	Local Road to Arterial Road	Triangle	<b>10 metres by 10 metres</b>	Collector Road to Arterial Road	Triangle	<b>10 metres by 10 metres</b>	Arterial Road to Arterial Road	Triangle	15 metres by 15 metres	Any Town Road intersecting a Regional Road	Triangle	15 metres by 15 metres
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## 15. Jason Afonso

11.3.16	The conveyance of daylight triangles having lesser dimensions than specified in Table C2 will only be accepted where the reduce standard is proven to be acceptable to the Town, subject to the criteria in this Plan.	<p>The appropriateness of daylight triangle standards are context sensitive. For example, a standard daylight triangle may suit a sightline and functional road requirement in one instance, but the exact same daylight triangle and road character may not exceed sightline requirements depending on a number of context sensitive reasons such as boulevard design, sidewalk, posted speed, road curvature, active transportation within the roadway. In light of the proposed Table C2 and this policy, we request that the policy be revised as follows:</p> <p><i>The conveyance of daylight triangles having lesser dimensions than specified in Table C2 may be considered based on site context if validated through technical study to the satisfaction of the Town.</i></p>
11.3.23	<p>To maintain and protect the traffic capacity of all arterial and collector roadways, the number and location of intersections will be controlled by the Town by:</p> <p>b) Encouraging, where appropriate, reverse frontage for residential lots on arterial roads;</p>	This policy conflicts with Section 7.2.8 which discourages reverse frontage lots. We recommend the Town encourage dual or double frontage lots or window streets where appropriate which provide an attractive streetscape along the arterials road and avoids unsightly fencing / noise walls and long-term maintenance costs for the Town / homeowners.
11.7.2	<p>The Town will ensure adequate off-street parking facilities are provided to meet the parking demand generated by various lands uses. Furthermore:</p> <p>c) Generally, the Town will restrict on-street parking on arterial roads to reduce the traffic hazard and improve traffic operations.</p>	We suggest that the Town consider lay-by parking to support uses which front onto arterial roads. This will help significantly with the Town on-street parking supply issues.
<b>12. Infrastructure</b>		
12.7.4	<p>Unless demonstrated to the satisfaction of the Town, the Region, and the Conservation Authority, stormwater management facilities and/or practices will not be permitted, solely or partially, within the following areas:</p> <p>a) hazardous lands, including flood prone areas, and areas inside the Conservation Authority's regulated areas;</p>	Regulated areas go beyond NHS features. It is typical to locate SWM ponds within regulated areas provided it is not within a feature. Consider removing reference to "areas inside the Conservation Authority's regulated areas".
<b>22.3 Urban Centre Designation</b>		
22.3.4	b) iv) Buildings on corner lots will provide a distinct architectural appearance with building massing and articulation that addresses both streets and creates a comfortable microclimate for pedestrians.	What does this mean? How does an applicant influence a microclimate with architectural appearance and articulation?

## 15. Jason Afonso

	d) ii) Surface parking for medium-density uses may be permitted, provided such parking is generally not located in close proximity to the streetline or in front of main building façades.	This would not allow for street townhouses. We trust this is intended for mid-rise and high-rise buildings. As such, we suggest referencing mid and high rise buildings if applying this policy.
<b>22.4 Neighbourhood Centre Designation</b>		
22.4.3	f) Buildings as high as 10 storeys may be permitted.	We request the Town consider removing height restrictions within Neighbourhood Centres and allow appropriate height to be determined at the Secondary Plan stage.
<b>22.5 Urban Corridor Designation</b>		
22.5.2	A broad range of retail, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses may be permitted. Medium and high density residential uses are also permitted. Ground-related medium density residential uses may be permitted towards the rear of the Urban Corridor.	Consider allowing rear-lane ground-related uses along the Urban Corridor.
22.5.3	c) Buildings up to 8 storeys may be permitted.	We request the Town consider removing height restrictions along the Urban Corridor Designation and allow appropriate height to be determined at the Secondary Plan stage.
<b>22.8 Major Commercial / Mixed Use Designation</b>		
22.8.3	d) The minimum height of any new residential building will be 4 storeys and the maximum height will be 12 storeys. The minimum height for non-residential buildings will be two storeys.	Allow for 3-storey residential uses to allow for stacked townhouse housing forms. Allow for 1-storey buildings with 2-storey massing. ie. Supermarkets. Not every commercial building can be 2 storeys in height. We request the Town consider removing height restrictions within the Major Commercial / Mixed Use Designation and allow appropriate height to be determined at the Secondary Plan stage.
<b>23.8 General Employment Area Designation</b>		
23.8.2	a) The following uses may be permitted within the General Employment Area designation:  ii) open storage uses, contractors yards and truck parking where the minimum lot coverage for buildings and structures is 10%;	Requiring 10% lot coverage for industrial parcels to allow for outdoor storage is too excessive. We request that a minimum lot coverage be removed.
<b>24.3 Official Plan Amendments – Secondary Plans</b>		

## 15. Jason Afonso

24.3.2	Each secondary plan will be based on the following studies prepared to the satisfaction of the Town in accordance with all applicable terms of reference:  a) a Town-led subwatershed study, prepared in accordance with Council-approved terms of reference, which at a minimum includes:	We request that this policy be revised to allow joint or hybrid subwatershed study preparation and since Terms of Reference for technical studies aren't required by the Planning Act to be approved by Council, we respectfully suggest that this and similar references to "Council approved" technical documents be removed from the OP.
	e) a development staging a sequencing plan	We suggest that it is premature to prepare a development staging a sequencing plan at the Secondary Plan level. A Staging and Sequencing Plan is more appropriate at the Block Plan stage after the Secondary Plan is established and more information is available (ie. road network, services, swm management) in order to determine how best to stage the development. It would be very difficult to address the list of items required as part of a DSSP until Block Plan level information is available. This requirement should be moved to Section 24.4
	e) vii) allow for the completion of distinct components of new community areas so that the length of time that an area is under construction is minimized, where possible; and,	We request this policy be removed as this is difficult to implement and is contingent on business decisions to proceed with development, and can prolong development progress in other areas that are ready to go.
24.3.3	An official plan amendment for a secondary plan will be supported by a series of urban design, landscape and transportation planning guidelines that will inform the preparation and consideration of implementing development applications.	This policy assumes that a development application is made after the Secondary Plan. Given that the town is now introducing Block Plans, Urban Design, Landscape and Transportation planning guidelines are more appropriately established at the Block Plan stage when a Block Plan Land Use Plan is available for which to base the guidelines. This requirement should be moved to Section 24.4
24.3.4	q) a phasing plan that sets out how each component of the secondary plan area will be phased in a logical manner.	This should be dealt with through the DSSP at the Block Plan Stage. We request that this policy be removed.
<b>24.4 Official Plan Amendments – Block Plans</b>		
24.4.1	Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.	We request that an option be provided to approve/establish Block Plans outside of an OPA process.  It should be noted that Block Planning, although sometimes applied to greenfield master planned communities, is not recognized nor sanctioned by the Planning Act. As such, its application should only be used in limited circumstances and should never constitute the need for an Amendment to the Official Plan. As such, we request that this policy be modified accordingly.

24.4.4	<p>The Town will prepare terms of reference for block plans and identify specific study requirements through the pre-consultation process for the required official plan amendment. The costs associated with the studies and the preparation of a block plan will be shared equitably among benefitting landowners on a proportional basis. Benefitting landowners who choose not to participate in the preparation of a block plan but later decide to develop their lands will be required to make a financial contribution to the costs of preparing the block plan based on their proportional share.</p>	<p>We request that an option be provided to approve/establish Block Plans outside of a formal planning application process. It's not clear if it is the Town's intent to undertake the studies and require reimbursement on a cost recovery basis by benefitting landowners. Please clarify.</p>
<b>27.2 Complete Application Submission Requirements</b>		
27.2.5	<p>Exemptions and/or modifications to the complete application requirements of this Plan may be granted by the Director of Planning or designate.</p> <p>a) Any such exemptions or modifications will be specified in writing during the mandatory preliminary (PARC) meeting.</p> <p>b) In considering the appropriateness of any such exemptions or modifications the Director or designate may take into account relevant factors such as:</p> <p>i) where it has been determined that completion of such studies has occurred for an earlier planning approval;</p> <p>ii) where the study requirement would result in an unnecessary duplication of effort; or,</p> <p>iii) where the material is not relevant.</p>	<p>Consider adding "where the study is considered to be premature in the approval process" to subsection b).</p>

From: Bousfields Inc.

Date: August 9, 2023

**Re: Comments on Draft Caledon Official Plan**

Draft Caledon Official Plan Policy	Bousfields Comments
<p>4.1.2</p> <p>Increases to population, household, and employment forecasts can only occur as an update initiated by the Region of Peel, through an amendment to this Plan.</p>	<p>Implies population forecasts are not minimum. This should not be read as a cap on population within the settlement area.</p>
<p>4.5.1</p> <p>When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.</p> <p>4.5.3</p> <p>Privately initiated secondary plans will not be permitted.</p>	<p>Should be acknowledged that the secondary plan has been initiated for BNHLG lands based on our application. We are currently working together with staff in this respect.</p>
<p>4.5.5</p> <p>Town initiated secondary plans may be prepared for specific areas of the Town, outside of the Designated Greenfield Area, where it is considered necessary to provide more detailed planning objectives and policies for intensification, redevelopment or other development activities.</p>	<p>Clarify. Does this mean secondary plans may be prepared outside of the settlement areas?</p>
<p>4.5.6</p> <p>In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the 2051 New Urban Area until after the structure of a connected transportation system is planned to the Region's satisfaction, including:</p>	<p>Would the "structure of a connected transportation system" not be completed as part of this OP Review, or through the respective Secondary Plan process? What exactly needs to</p>

<ul style="list-style-type: none"> <li>a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and</li> <li>b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway</li> </ul>	be completed for the Secondary Plan to be approved?
<p>4.5.7</p> <p>In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region's satisfaction.</p>	<p>What is the status for establishing the "jurisdiction and financial mechanism" for a complete local transit system. Given there is already some amount of existing transit along highway 50 with the Go bus, which could extend further north into the BNHLG lands, it would appear that this already exists to a certain extent for the BNHLG lands. Bolton also utilizes Voyogo for local bus service.</p>
<p>9.10.1 Affordable Housing</p> <ul style="list-style-type: none"> <li>a) Affordable housing is defined as a residential unit of either rental or ownership tenure wherein the rent or sale price is no greater than 80 per cent of the median market rate. The Town will work toward achieving the Regional goal of 30 per cent of all new housing units meeting this threshold.</li> <li>b) The Town will require a housing assessment in support of a development application proposing more than 50 dwelling units. The housing assessment will be prepared by the applicant as part of a complete application and will demonstrate conformity with the housing objectives and policies in the Region of Peel Official Plan and this Plan, including: <ul style="list-style-type: none"> <li>i. contributions made to all housing targets identified by the Town and Region;</li> <li>ii. the availability of an appropriate range and mix of housing types, densities, sizes, and tenure that contribute to the supply of affordable housing;</li> </ul> </li> </ul>	<p>What is the current affordable housing price for rental and ownership?</p>







# BOUSFIELDS INC.

<p>iii. identification and conveyance strategy for affordable housing in consultation with the Region of Peel; and,</p> <p>iv. where the proposed development is contributing toward supportive, shared, or residential care units, demonstrate the contributions towards universal accessibility targets</p>	
<p>9.10.3 Zoning and Secondary Planning</p> <p>a) The Town will work with the Region to identify and pre-zone sites, including vacant or underutilized sites, for affordable housing.</p> <p>b) The Town will work with the Region to prepare a housing assessment report to inform housing policies in new or revised secondary plans, block plans, or neighbourhood plans</p>	<p>When is this expected to occur?</p>
<p><b>11.3 Road Network</b> 11.3.1</p> <p>The Town's Road network consists of Town roads, Regional roads and Provincial freeways and highways. The primary road network is set out on Schedule C1, Town- wide Transportation Network and Schedule C2, Town-wide Road Right-of-way Widths. The conceptual collector road network for the New Urban Area is set out on Schedule F1, Urban System. Other roads are shown on the land use schedules of this Plan and its secondary plans. Unless otherwise detailed on Schedule C1, Schedule F1, or a land use schedule, all roads will be deemed to be local roadways.</p>	<p>Schedules show the extension of Kingsview Drive north through the BNHLG lands, which is not included in the BNHLG application or the site-specific application for that site. This needs to be discussed with the applicants.</p>

**Table C1**

Collector Roads	Town	- accommodate low to moderate volumes of short distance traffic at moderate speeds between local and arterial roads	- 20 to 30 metre road allowance with 2 to 4 lane capacity 	- designed to accommodate some degree of separation for cycling facilities, where appropriate - provide individual property access with some limitations - pedestrian facilities on both sides of the road where feasible - on-street parking may be permitted
Local Roads	Town	- accommodate local traffic to provide connections to collector roadways at low speeds	- 16 to 20 metre road allowance with 2 lane capacity 	- provide direct property access - on-street parking may be permitted - shared cycling facilities and sidewalks on both sides of the road where feasible

The size of the collectors are quite wide. Are there cross sections for these?

11.3.8

The Town will conduct a study to assess the merits and feasibility of new collector roads through secondary planning to facilitate development, connect future communities and employment lands, and accommodate continuity of transit service and active transportation routes, while protecting the natural environmental features. Based on the findings of the study, the Town may initiate an Environmental Assessment and property protection for the corridor(s).

This policy indicates that collectors will be assessed at the Secondary Plan stage, but they already show the location of the collector on schedule F1? Please clarify.

### 12.3 Drinking Water and Wastewater Servicing

12.3.1

Servicing studies have been completed for the BNHLG lands. Please confirm.

<p>A comprehensive water and sewer servicing study may be required in any individual settlement, prior to the release of lands for development, to ensure adequate and appropriate water and sewer services are available.</p> <p>12.3.2</p> <p>Water and sewer services are to be planned, developed, and utilized in an efficient manner, and the Town, in consultation with the region, may impose conditions on servicing, including placing time limits on approvals that reserve servicing capacity.</p> <p>12.3.3</p> <p>The Town will direct and accommodate expected growth or development in a manner that promotes the efficient use and optimization of existing municipal local and regional sewage services and municipal water services.</p>	
<p>12.3.6</p> <p>Development requiring additional or new water supply and/or sanitary sewer services will not proceed prior to the finalization of a Servicing Agreement with the Region, confirming the responsibility for, and ability to provide, appropriate facilities for water supply and sewage disposal. In the case of plans of subdivision, confirmation will be required prior to draft approval, that servicing is or will be available.</p>	<p>Clarify status of this please?</p>
<p><b>13.4 Development and Site Alteration</b></p> <p>13.4.1</p> <p>Development and Site Alteration within Greenbelt Plan and Growth Plan Natural Heritage Systems and Key Hydrologic Features Outside of the Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan and Outside Settlement Areas.</p> <p>Development or site alteration is not permitted within the Greenbelt Plan and Growth Plan natural heritage systems and key hydrologic features outside of the Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan and outside of settlement areas except for:</p>	<p>Are stormwater ponds permitted in the Greenbelt area? This has been done in the past.</p>
<p>13.4.8</p> <p>Development and Site Alteration within Settlement Areas</p>	

<p>a) Within settlement areas, buffers are important components of the overall Natural Environment System and are required to maintain and protect natural features and the ecological functions of the Natural Environment System. In this regard, minimum buffer widths shall be established in subwatershed studies or their equivalent when Secondary Plans are prepared to support new development in settlement areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Environment System being studied.</p> <p>b) The final buffer width in settlement areas will be determined through an environmental impact study at the development stage when additional information is available to determine the nature of adjacent uses and related impacts on the Natural Environment System and may include additions or deletions to the buffer widths identified through the secondary plan process provided that the minimum buffer width be 10 metres, unless associated with public facility development, as identified in subsection 15.4.7 m). The environmental impact study will be prepared in accordance with Section 13.8.13</p> <p>a)</p>	<p>Unclear. Are buffers determined through a study, or minimum 10 metres? Further discussion.</p>
<p>g) A buffer width of less than 10 metres may only be considered abutting a public facility such as a stormwater management facility, school, or park if:</p> <p>i. it can be demonstrated through a facility fit plan or detailed engineering design that examines the intensity of use throughout the whole site and, in particular the location of buildings and structures and outside activity areas in relationship to the buffer, and that recommends appropriate mitigation measures such as fencing and planting, such that there will be no negative impacts on the natural features and ecological functions of the Natural Environment System;</p> <p>ii. development form is established through zoning or some other legal mechanisms; and,</p> <p>iii. all of the other requirements of this section have been met.</p>	<p>Is a buffer only permitted to be lesser only for a public use? Discussion.</p>
<p>13.5.6 Enhancement Areas</p> <p>Enhancement areas have not been identified on the schedules to this Plan. Enhancement areas are intended to consist of natural self-sustaining vegetation that increase the ecological resilience and function of individual key natural</p>	<p>Clarify the meaning and applicability of “enhancement area” as it may apply to the BNHLG application.</p>

<p>13.5.7 Linkages</p> <p>a) Linkages have not been identified on the schedules to this Plan. Opportunities for the establishment of ecologically appropriate linkages shall be screened for when an environmental impact study, hydrologic evaluation, and/or subwatershed study is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.</p>	<p>Same question as above with respect to “linkages”.</p>
<p>13.9.3</p> <p>Ongoing and Approved Secondary Plans</p> <p>a) Where a secondary plan has been approved after date to be determined those portions that are not subject to a draft approved plan of subdivision or plan of condominium will be approved in accordance with the approved mapping and policies of the secondary plan.</p> <p>b) Where a secondary plan was approved prior to (date to be determined] those portions that are not subject to a draft approved plan of subdivision or plan of condominium will be subject to the mapping and policies of this Plan. In this regard, conformity can be demonstrated through an update to the secondary plan or through the approval of individual plans of subdivision or plans of condominium, as determined appropriate by the Town.</p> <p>c) Where a secondary plan was approved prior to (date to be determined] those portions that are not subject to a draft approved plan of subdivision or plan of condominium will be subject to the mapping and policies of this Plan. In this regard, conformity can be demonstrated through an update to the secondary plan or through the approval of individual plans of subdivision or plans of condominium, as determined appropriate by the Town.</p> <p>a)</p>	<p>Confirm this applies to BNHLG – already in process Secondary Plan</p>
<p>14.5.3</p> <p>Neighbourhood Parks will cater to the needs and interests of the residents living within its general vicinity for both organized and unorganized leisure activities. Neighbourhood Parks contain a mixture of passive areas, low to intermediate sports facilities, informal and formal play areas, and seating areas with shade. The following criteria will be considered in the provision of Neighbourhood Parks:</p>	<p>Clarify how this may apply to BNHLG application.</p>



<ul style="list-style-type: none"> <li>a) Neighbourhood parks will have a minimum area of 2.0 hectares to accommodate a variety of outdoor recreation activities;</li> <li>b) That the site is located within a service radius of about 800 metres to the residential area served and is unobstructed by major barriers, such as wide or busy roads, rail lines or corridor fences;</li> <li>c) That the site contains adequate street frontage for visibility and safety;</li> <li>d) That the site can be linked, where feasible, to the trail network; and,</li> <li>e) That the site contains sufficient tableland (approximately 80 percent of site) and is well drained</li> </ul>	
<p><b>22.2 New Community Area Designation</b></p> <p>The New Community Area designation will be applied pending the preparation and approval of secondary plans in accordance with the growth phasing policies of Chapter 4, and other policies of this Plan. The New Community Areas designation identifies lands to be developed as future residential communities.</p>	<p>This would be our new designation pending completion of secondary plan?</p>
<p><b>22.4.3(f)</b></p> <ul style="list-style-type: none"> <li>a) Buildings as high as 10 storeys may be permitted.</li> </ul>	<p>Max 10 storeys in the Neighbourhood Centre at Emil Kolb and Highway 50. Confirming</p>
<p><b>24.2 Site-specific Official Plan Amendments</b></p> <p>24.2.1</p> <p>The Town will evaluate site-specific amendments to this Plan within the context of the vision, guiding principles, town structure and policies set out in this Plan.</p> <p>24.2.2</p> <p>Where the growth management policies of this Plan require development to occur in accordance with an approved secondary plan, a site-specific official plan amendment to allow</p>	<p>This would appear to be where the BNHLG application fits. Concurrent with secondary plan. Discuss to confirm.</p>



<p>development may only be considered following or concurrent with the adoption of the area secondary plan.</p> <p>24.2.3</p> <p>An official plan amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site will only be considered as part of an official plan review</p>	
<p>24.3.2</p> <p>Each secondary plan will be based on the following studies prepared to the satisfaction of the Town in accordance with all applicable terms of reference:</p> <p>a) a Town-led subwatershed study, prepared in accordance with Council-approved terms of reference, which at a minimum includes:</p>	<p>Where is the town with this study?</p>
<p>a) a development staging and sequencing plan to:</p> <ul style="list-style-type: none"> <li>i. establish a logical progression of growth as an integrated extension of existing communities based on identifiable boundaries and having regard for physical and natural features and barriers;</li> <li>ii. schedule and finance all of the infrastructure (hard and soft) needed to support growth in conformity with the planned urban structure for the community;</li> <li>iii. extend roads and servicing infrastructure in a cost-effective and financially sustainable manner and ensure that the costs of extending infrastructure can be supported through expected development charge revenues within a reasonable period;</li> <li>iv. construct early centralized stormwater management facilities and associated infrastructure to ensure no undue grading and servicing constraints on future developments, minimize the number of facilities, protect the natural environment and ensure no negative impacts to public and private property;</li> </ul>	<p>How does this apply to the BNHLG application now in process?</p>

<p>v. stage growth within convenient walking distance of transit corridors (where they exist or are planned) to generate sufficient transit ridership;</p> <p>identify areas for key community infrastructure to be implemented early in the planning approval process (e.g., lands for public health, education, recreation, parks and open space, cultural and community facilities, public safety and affordable housing), avoiding the lands of non-participating landowners, where possible;</p>	
<p><b>24.4 Block Plans</b></p> <p>24.4.1</p> <p>Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.</p> <p>vi.</p>	<p>How will this be applied to the current BNHLG application?</p>
<p>24.5.2</p> <p>Comprehensive development plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town's terms of reference. If an approved secondary plan or block plan includes the technical level of detail that would typically be included in a comprehensive design plan, a separate comprehensive development plan will not be required, at the discretion of the Town.</p>	<p>Block plan may not be required depending upon the detail of the secondary plan. Please confirm?</p>
<p><b>26.2 Parkland</b></p> <p>26.2.1</p> <p>The planning objective for parkland is to maintain a minimum of 2.7 hectares of active parkland for every 1,000 residents. The Town will designate lands for new parks through the secondary planning process, and reduce identified parkland deficiencies, where feasible, in accordance with the Parks and Recreation Strategy.</p> <p>26.2.8</p> <p>Park blocks should have a minimum street frontage of 50 metres, or 1 metre per 100 square metres of park space, whichever is greater.</p>	<p>How will this be applied to the BNHLG application?</p>
<p>a) The following criteria will be used to evaluate all development applications:</p> <p>i. consistency with the Provincial Policy Statement;</p>	



<ul style="list-style-type: none"><li>ii. conformity with applicable Provincial Plans and legislation;</li><li>iii. conformity with the Region of Peel Official Plan;</li><li>iv. conformity with the vision and guiding principles of this Plan;</li><li>v. conformity with the growth management policies of this Plan;</li><li>vi. conformity with the Town Structure;</li><li>vii. conformity with the policies of this Plan;</li><li>viii. conformity with the policies of the applicable land use designation;</li><li>ix. consideration of applicable standards, guidelines, protocols, and terms of reference;</li><li>x. the availability of municipal services, in conformity with the growth management, phasing, and growth financing policies of this Plan. xi) potential planning impacts on adjacent and nearby properties and the extent such impacts may be managed and mitigated. Planning impacts may include matters such as, but not limited to:<ul style="list-style-type: none"><li>• traffic and access management;</li><li>• noise and vibration;</li><li>• changes to parking availability on streets or at adjacent properties;</li><li>• emissions generated by the uses such as odour, dust, or other airborne emissions;</li><li>• changes to lighting;</li><li>• garbage generated by the proposed use;</li><li>• changes to privacy;</li></ul></li></ul> <p>changes to shadowing;</p>	<p>I have never seen such a policy. An OP is meant to be read as a whole and then conformity assessed.</p> <p>This policy breaks down the evaluation of applications into a sort of checklist of items.</p> <p>Discussion on how this will be applied.</p>
<p>27.4.4</p> <p>Design Guidelines</p> <p>a) Design guidelines will be:</p>	<p>The word “consistent” is likely fine. But “have appropriate regard for” is likely better. Consistency is a test applied to the PPS policies, and I think guidelines are less stringent.</p>



# BOUSFIELDS INC.

<ul style="list-style-type: none"><li>i. prepared by qualified urban designers;</li><li>ii. approved by Council; and,</li><li>iii. used to guide the design and construction of municipal projects and the evaluation of development applications.</li></ul> <p>b) Development applications should be consistent with all applicable Council-approved design guidelines.</p> <ul style="list-style-type: none"><li>• The Town may require the preparation of area-specific design guidelines to support the implementation of secondary plans, block plans, and major development proposals, including plans of subdivision.</li></ul>	
c)	

August 21, 2023

Town of Caledon  
6311 Old Church Road  
Town of Caledon, Ontario  
L7C 1J6

**Attention: Ms. Bailey Loverock**  
**Team Lead – Official Plan Review / Senior Planner**

**Re: Town of Caledon Official Plan Review (Draft Official Plan March 2022)**  
**899 Old School Road, Caledon**  
**Formal Submission by Sundial Homes (Caledon) Limited**

Dear Ms. Loverock,

Sundial Homes (as Sundial Homes [Caledon] Ltd.) is the owner of a property located at the south-west corner of Mississauga Road and Old School Road, in the Town of Caledon. The legal description of our property is part of Lot 22, Concession 5, West of Hurontario Street, formerly Township of Chinguacousy, now in the Town of Caledon. Through our planner Karen Bennett at Glen Schnarr & Associates, Sundial submitted comments on the Town's SABE Study on June 4, 2021 (Attachment 1). On April 19, 2022, we submitted additional comments regarding the subject property in relation to the Town's *Draft Official Plan* and *Official Plan* schedules (Attachment 2). Most notably, Schedules A2 (Growth Management) and C1 (Natural Heritage System) extended the limits of abutting natural features well beyond their east footprint onto our property. In our submission, we had requested that the mapping of the features be scaled back to depict an accurate siting of the features on and off site.

Appreciatively, it appears the *Future Plan*/Official Plan updates released to the public in June 2023 incorporate the more accurate depiction of the features in relation to our property as we requested, now shown on Schedule B1, *Town Structure*. Since the draft policies continue to uphold the standard practice of allowing for further refinements to the delineations of natural features through additional study, we will look forward working with the Town to recognize any further refinements at an appropriate time.

Understanding this property is within the limits of the Town's whitebelt, we'll remain prudent with our ongoing monitoring as we continue to believe this property to be in an optimal location for new community growth. When appropriate, we would encourage the Town to continue to evaluate the merits of this location for future growth and Sundial would be happy to support any data exchange to facilitate such.

We kindly request to be circulated on all communication material relating to *Future Caledon* and will look forward to this community building with you. Should you have any questions or wish to discuss these ideas further, please do not hesitate to contact the undersigned.

17. Mara Samardzic

With thanks,

*Mara Samardzic*

Mara Samardzic, MCIP, RPP  
Director of Planning and Development  
Sundial Homes

Cc: Daniel Yanowsky, VP Planning and Land Development, Sundial Homes  
Karen Bennet, MCIP, RPP. Glen Schnarr & Associates.  
Chris Matson, Matson Planning and Development Inc.

Attachment 1 – Letter from Karen Bennett of GSAI, June 4, 2021.

Attachment 2 – Letter from Karen Bennet of GSAI, April 19, 2022.





April 19, 2022

Refer To File: 867-005

Town of Caledon  
6311 Old Church Road  
Town of Caledon, Ontario  
L7C 1J6

**Attention: Ms. Bailey Loverock**  
**Team Lead – Official Plan Review / Senior Planner**

**Re: Town of Caledon Official Plan Review (Draft Official Plan March 2022)**  
**899 Old School Road, Caledon**  
**Formal Submission on Behalf Sundial Homes (Caledon) Limited**

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Sundial Homes (Caledon) Limited who own approximately 97 acres located at the southwest quadrant of Old School Road and Mississauga Road in Caledon (*Figure 1*). GSAI has been engaged in the Region of Peel's Municipal Comprehensive Review process and the Town of Caledon's Official Plan review process and further to our submission to the Region and Town on June 4, 2021, we wish to submit further comments to the Town of Caledon now that we have reviewed the Town's Draft Official Plan, released March 21, 2022.

Our comments specifically relate to the Town's proposed Schedule A2 (Growth Management) and Schedule C1 (Natural Heritage System) as it relates to these lands (see attached excerpts). Specifically, we are concerned that the Town's proposed draft 'Environmental Protection Area' mapping (on Sch A2) and 'Natural Heritage System' mapping (on Sch C1) have extended the limits of the features to well beyond where they exist on the subject lands, and they should be scaled back to more accurately reflect the actual features on site (and more specifically, off site).

A very clear (and recent) air photo is attached here to assist you in understanding the clear limits of the feature which exists to the southwest of these lands. We respectfully request that the Town's Draft Official Plan mapping on Schedule A2 (Growth Management) and Schedule C1 (Natural Heritage System) be amended to remove the extent of NHS / EPA mapping that extends beyond the feature itself as shown on the subject lands.

10 KINGSBRIDGE GARDEN CIRCLE  
SUITE 700  
MISSISSAUGA, ONTARIO  
L5R 3K6  
TEL (905) 568-8888  
FAX (905) 568-8894  
www.gsai.ca



**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

Thank you for your consideration. Please do not hesitate to contact the undersigned at 905-568-8888 x235 should you wish to discuss this further.

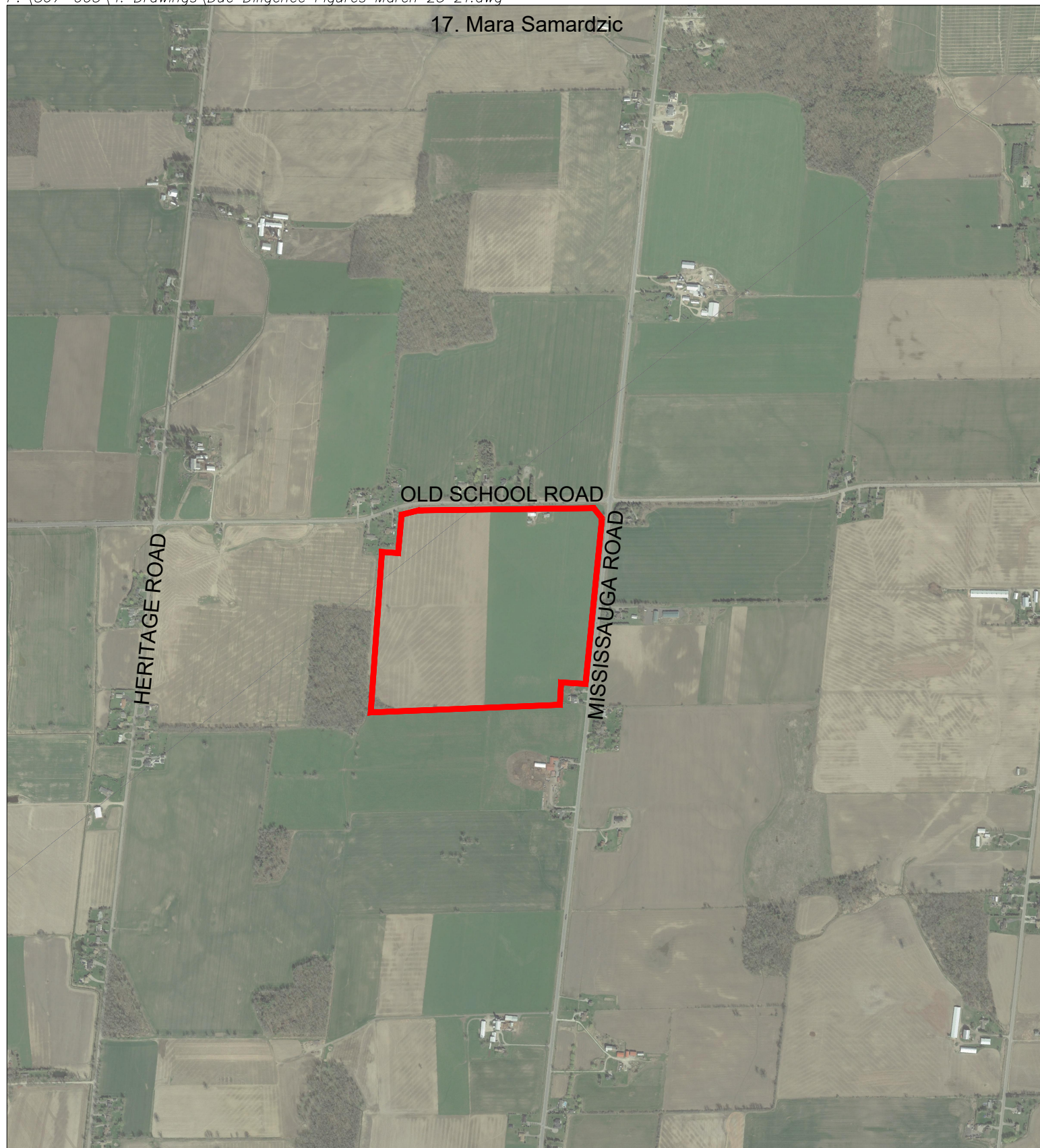
Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Karen Bennett, MCIP, RPP  
Partner

Cc: C. Matson

17. Mara Samardzic



# FIGURE 1

## AERIAL CONTEXT MAP

899 Old School Road,  
Town of Caledon, Regional Municipality of Peel

### LEGEND

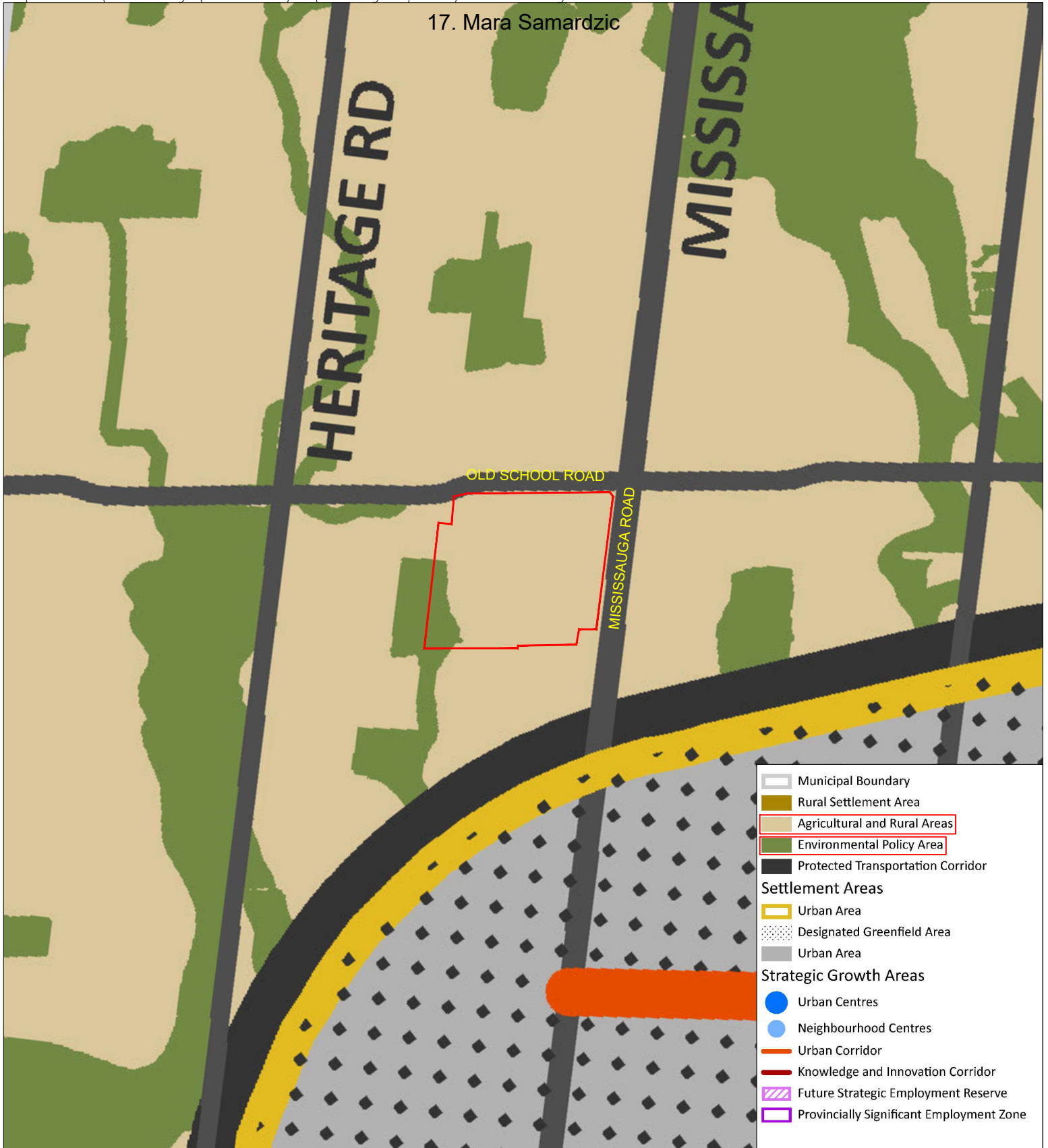
 Subject Property



Scale NTS  
March 25, 2021



17. Mara Samardzic



# TOWN OF CALEDON DRAFT SCHEDULE 'A2' - GROWTH MANAGEMENT

899 Old School Road,  
Town of Caledon, Regional Municipality of Peel

## LEGEND

Subject Property



Scale NTS  
April 18, 2022

17. Mara Samardzic



# TOWN OF CALEDON DRAFT SCHEDULE 'C1' - NATURAL HERITAGE SYSTEM

899 Old School Road,  
Town of Caledon, Regional Municipality of Peel

## LEGEND

Subject Property



Scale NTS  
April 18, 2022





**Site Location**

**Figure 1**

Natural Heritage Due Diligence,  
899 Old School Road, Caledon



Project: 221137  
Last Revised: March 2021

Client: Sundial Homes

Prepared by: DU  
Checked by: DW **DRAFT**



1:10,000

Inset Map: 1:50,000

Contains information licensed under the Open Government License—  
Ontario Orthoimagery Baselayer: FBS Peel 2020



June 4, 2021

Refer To File: 867-005

Region of Peel  
Regional Planning and Growth Management  
10 Peel Centre Drive, Suite A, 6<sup>th</sup> Floor  
Brampton, Ontario  
L6T 4B9

*Submitted electronically*

**Attention: Adrian Smith**  
**Interim Chief Planner and Director, Region Planning and Growth Management**

Town of Caledon  
6311 Old Church Road  
Town of Caledon, Ontario  
L7C 1J6

**Attention: Ed Sajekci, Acting Chief Planning Officer; and**  
**Marisa Williams, Manager, Policy, Heritage and Design**

**Re: Region of Peel Municipal Comprehensive Review (Peel 2051)**  
**Settlement Area Boundary Expansion (SABE) Study**  
**Town of Caledon Official Plan Review**  
**899 Old School Road, Caledon**  
**Formal Submission on Behalf Sundial Homes (Caledon) Limited**

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Sundial Homes (Caledon) Limited who own approximately 97 acres located at the southwest quadrant of Old School Road and Mississauga Road in Caledon (*Figure 1*). GSAI has been engaged in the Region of Peel's Municipal Comprehensive Review process and the Town of Caledon's Official Plan review process and we wish to submit comments to the Region and Town to support





consideration of these lands in the 2051 SABE. Accordingly, on behalf of our client, and further to the video call we participated in with Regional staff on Monday March 15, 2021 in this regard, please accept these comments on the Peel 2041/2051 Municipal Comprehensive Review (MCR) related to Growth Management and Settlement Area Boundary Expansion.

The subject lands are located west of the current Mayfield West Settlement Area and are located outside of the Greenbelt Plan Area. On September 12, 2020, the Town of Caledon held a Special Council meeting on the Official Plan Review process, whereby a proposed Draft Future Town Structure was presented, illustrating all Whitebelt lands in Caledon to be considered for potential future settlement area boundary expansion. Notably, the subject lands fall within the Town's "Mayfield West Area" on this proposed Draft Future Town Structure to be considered for future settlement area (see **Figure 2** attached).

Interestingly, the Region's Settlement Area Boundary Expansion Study (SABE) map does not currently consider the subject lands as part of the "Focus Study Area" for potential future areas for settlement area boundary expansion (see **Figure 3** attached). As illustrated on the attached, the Region has only included lands south of the future GTA West Corridor as part of the Focus Study Area to be assessed for potential settlement area expansion. In light of the uncertainty surrounding the GTA West, and in consideration of the fact the growth allocation to be achieved by Peel is a target and not a maximum by any means, we suggest it is appropriate for the Region to expand the Focus Study Area scope and include lands that are in the vicinity of Mississauga Road and Old School Road (including the subject lands).

As the Region considers our request, and in an effort to be consistent with the Town's mapped consideration of future growth areas, we request that the Region consider the Town of Caledon's draft Town Structure and assess all of Caledon's whitebelt lands as areas of potential future settlement area boundary expansion.

We specifically believe that these lands should be considered as a candidate area for settlement area boundary expansion for the following reasons:



- The City of Brampton is currently planning their new Heritage Heights community south of Mayfield Road between Mississauga Road and Winston Churchill Boulevard, which is slated to be available for development in 2022. This new community is planned to be built out by 2041 and municipal water and sanitary sewer services will be available to Mayfield Road and therefore will be available for efficient and cost-effective service delivery to the subject lands south of Old School Road, west of Mississauga Road. The Town and the Region are looking to accommodate development consistent with the Provincial Growth Plan to the year 2051 and these lands are a logical and contiguous continuation of northerly extension of future development to the year 2051;
- The Province has determined their preferred GTA West Corridor west of Mississauga Road; however, Regional Council has recently submitted a Resolution noting they do not support the GTA West corridor. The subject lands are a logical area for future community planning that can provide a complete community of housing and jobs for the future of Caledon and Peel Region, and that can complement the future vision of road infrastructure investment by the Province. It is logical and efficient for the Region to consider lands on both sides of the GTA West Corridor, not only the land south of the corridor (especially in light of the fact the future of the GTA West is a little uncertain); and,
- The subject lands are within the Whitebelt area of the Provincial Growth Plan and they represent a logical extension of urban boundary expansion from the existing Brampton urban area, similar to the other Whitebelt lands north of Mayfield Road in Caledon.

We feel that the subject lands can be serviced cost-effectively and can efficiently utilize the existing and planned infrastructure. The lands are physically suitable and conveniently located in close proximity to the future GTA West Corridor. We request that the Region consider and assess the inclusion of these lands as candidate areas for settlement area expansion, as the Town of Caledon has illustrated on their Draft Town Structure.



**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

Thank you for your consideration. Please do not hesitate to contact the undersigned at extension 235 or on my cell at 416-460-2065, should you wish to discuss this further.

Yours very truly,

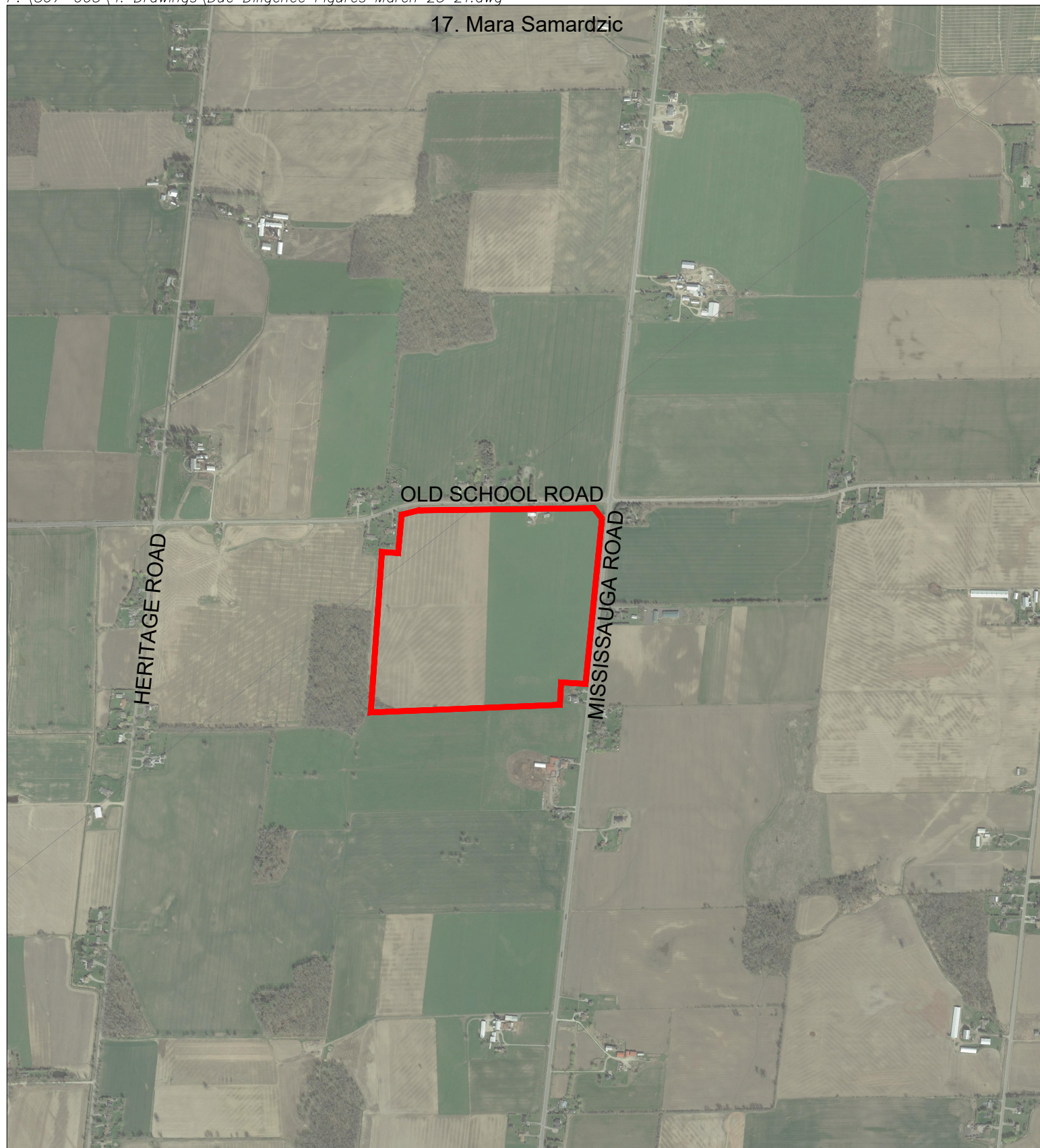
GLEN SCHNARR & ASSOCIATES INC.

Karen Bennett, MCIP, RPP  
Senior Associate

Cc: C. Matson



17. Mara Samardzic



# FIGURE 1

## AERIAL CONTEXT MAP

899 Old School Road,  
Town of Caledon, Regional Municipality of Peel

### LEGEND

 Subject Property



Scale NTS  
March 25, 2021





## FIGURE 2

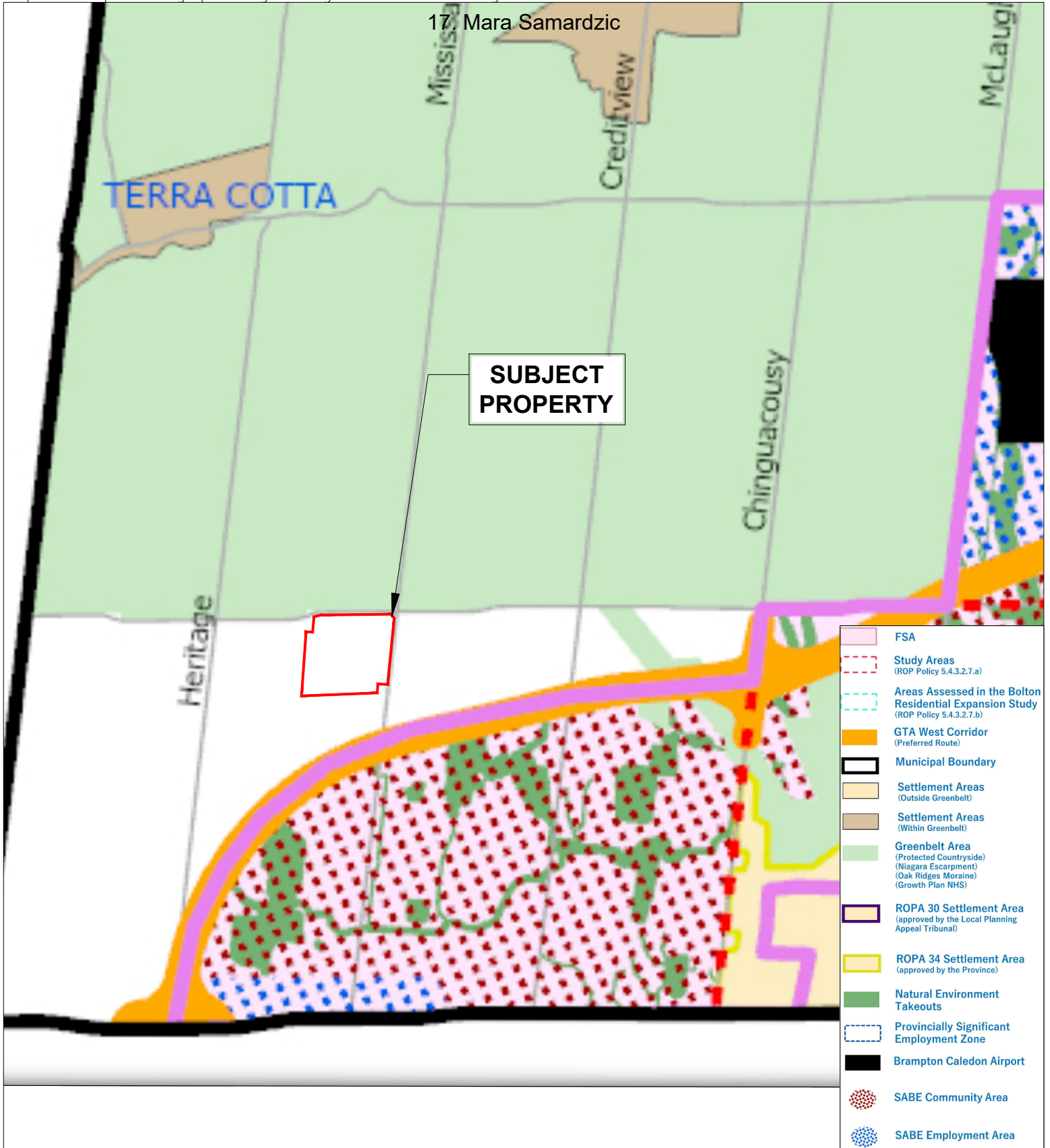
### DRAFT FUTURE TOWN STRUCTURE TOWN OF CALEDON

Fieldgate Developments  
Town of Caledon, Region of Peel

— Subject Property




Scale: N.T.S.  
MARCH 25, 2021



**FIGURE 3**  
**SCOPED REGION OF PEEL DRAFT SETTLEMENT AREA BOUNDARY EXPANSION 'SABE' MAPPING (DRAFT FEB 2021)**

899 Old School Road,  
 Town of Caledon, Regional Municipality of Peel

**LEGEND**

 Subject Property



Scale NTS  
 March 25, 2021



August 23, 2023

GSAI File: 786-004

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: June 2023 Draft Caledon Official Plan  
Lands West of Humber Station Road, South of King Street  
Part of Lot 9, Concession 4, ALB  
(within Bolton Option 4 Area per BRES)  
Formal Submission on Behalf of Landowners  
Town of Caledon**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Gold Humber Station Inc. who own approximately 50 acres located on the west side of Humber Station Road, south of King Street in Caledon (herein referred to as the 'Subject Lands'). GSAI has been following the Town of Caledon's Official Plan review process over the last couple of years on behalf of these owners. Please accept our comments, now that we have reviewed the Town's Draft Official Plan, released June 2023.

The Region of Peel Official Plan, approved by the Minister of Municipal Affairs and Housing on November 4, 2022, brought the Subject Lands into the 2051 Urban Area for Community Uses.

Within the updated draft Town of Caledon Official Plan schedules, the Subject Lands are within "Urban Area" on Schedule B1 (*see Figure 1*), "Designated Greenfield Area" adjacent to an "Knowledge and Innovation Corridor" (Humber Station Road) and "Urban Corridor" (new road to be west of Humber Station Rd) on Schedule B2 (*see Figure 2*), and "New Community Area" on Schedule B4 (*see Figure 3*). On the draft Transportation Network Schedule C1, Humber Station Road is designated as "Town Arterial" and there appears to be a future conceptual collector road network within the Subject Lands, with a new collector road running N/S through the Subject Lands (*see Figure 4*). It is acknowledged that the draft Official Plan policy in the Official Plan indicates that conceptual collector roads shown per Schedule C1 are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.



We wish to offer the following comments on the draft policy text contained in the June 2023 Draft Official Plan:

Policy Number	Policy Text	GSAI comments
4.3.1	<i>“Development within Designated Greenfield Areas, as identified on Schedule B2, Growth Management, will be designed to meet or exceed a density of 67.5 residents and jobs combined per hectare.”</i>	GSAI notes that this density is higher than the minimum density as per the Growth Plan. Pls advise how the Town arrived at a min density of 67.5 residents and jobs combined per hectare.
4.5.1	<i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.”</i>	It is suggested that these policies are too restrictive and contradict the Planning Act. As per the Act, privately initiated applications, including for a Secondary Plan, are to be received (i.e. municipality can’t refuse receipt of a submission) by a municipality.
4.5.3	<i>“Privately initiated secondary plans will not be permitted.”</i>	We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council may have the discretion to allow privately initiated Secondary Plans on a site by site circumstance.”</i>  The revised wording would allow for the flexibility of a privately initiated Secondary Plan to be submitted and processed, where appropriate.
4.5.4	<i>“Each secondary planning process will be initiated and led by the Town in accordance with the policies of this Plan, the Region of Peel Official Plan, and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities.”</i>	
4.5.6	<i>“In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the new 2051 Urban Area until after the structure of a connected transportation system is planned to the Region’s satisfaction, including:</i>	GSAI understands this policy to mean that transportation planning, not construction, is needed prior to any Secondary Plan approval. Please confirm.



	<p><i>a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and,</i></p> <p><i>b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway.”</i></p>	
4.5.7	<p><i>“In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.”</i></p>	<p>We are not clear on the origination/ basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that with the unknown future of the Region, there are many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000 additional people a maximum threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>
4.6.1	<p><i>“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:</i></p> <p><i>a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken by the Region of Peel, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the Designated Greenfield Area;</i></p> <p><i>b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan based on the</i></p>	<p>Policies 4.6.1, 4.6.2 and 24.1.3 seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and the Provincial Policy Statement enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>



	<p><i>analysis provided in the Region's land needs assessment, while minimizing land consumption;</i></p> <p><i>c) the timing of the proposed expansion and the phasing of development within the Designated Greenfield Area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,</i></p> <p><i>d) the Growth Plan policies on settlement area boundary expansions are satisfied."</i></p>	
4.6.2	<i>"The establishment of new settlement areas is prohibited."</i>	
24.1.3	<i>"An official plan amendment to allow a settlement area boundary expansion may only be considered as part of a municipal comprehensive review, and in accordance with section 4.6, Settlement Area Boundary Expansions, of this Plan."</i>	
5.1.(b)	<p><i>"The planning objectives for climate change mitigation and adaptation are as follows:</i></p> <p><i>b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town's Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;"</i></p>	Policies 5.1(b), 5.4.1 and 9.11.1 should be softened to refer to 'encouraging compliance' (rather than requiring compliance) with the Green Development Standards (GDSs), and removing the word 'mandatory' as it relates to the GDSs. These Standards have only recently been released in draft and have yet to be reviewed and commented on, let alone approved.
5.4.1	<i>"The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan."</i>	Further, these will be guidelines/standards, not policy, and may be amended from time to time without a full public process. Accordingly, policy in the Official Plan should not <u>require</u> compliance with these standards otherwise the policy would have the effect of entrenching the GDSs into the policy planning framework as a test for new developments, and this is not appropriate, as guidelines or standards can be changed at any time without public consultation.
9.11.1	<i>"The Town will implement a series of Green Development Standards in collaboration with community partners, development groups, and the Region to work towards the climate</i>	



	<i>change objectives outlined in Chapter 5, Climate Change, of this Plan. All proposed housing developments will subject to review based on these standards.”</i>	Using language such as “requiring” is too onerous/restrictive. It should change to “encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).
5.2.4	<i>“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”</i>	<p>Release of a Terms of Reference document by the Town for this type of study is essential before we can offer support for this policy. In fact, It is suggested that in every instance where the Official Plan policy refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p> <p>Furthermore, the word “required” should be replaced with the word “encouraged”.</p>
5.4	Green Development Standards section	<p>Same concerns as noted above. Language such as ‘encourage’ or ‘promote’ are supported, rather than ‘require’ (which can prove too onerous or restrictive) as it relates to these Standards.</p> <p>The GDSs should not be treated as a test for the proponent but a working document for the Town and the development industry to use as a reference for achieving sustainability.</p>
7.1. a)	<p><i>“...To ensure this, new communities and developments will:</i></p> <ul style="list-style-type: none"><li><i>i) protect natural features and areas as contiguous systems, wherever possible;</i></li><li><i>ii) enhance the resiliency of natural features and areas through buffers and site design;</i></li><li><i>iii) conserve cultural heritage resources in context, wherever possible, and adapt built form to them;</i></li></ul>	Sub-policies ii) through v) should also include the language “wherever possible”.





	<p><i>iv) integrate existing landforms, uses, landmarks and significant site features; and,</i></p> <p><i>v) respect context and important viewshed through setbacks, siting and design.”</i></p>	
7.1.b iv	<p><i>“To prioritize the long term benefits of growth focused around existing settlement areas, the Town will:</i></p> <p><i>iv. apply the highest applicable standards in architecture and landscape architecture”</i></p>	<p>We request this policy be reviewed to ensure it is consistent with Bill 23, particularly with respect to the delivery of housing and addressing the current housing crisis.</p>
7.2.10	<p><i>“School sites will, where possible, be co-located with other public service facilities, such as parks and community centres, in a manner that supports their development as community hubs, focal points for the community and neighbourhood gathering places.”</i></p>	<p>This is a positive and supportable policy. Early discussion, coordination and consultation with the school boards is recommended to ensure the success of implementation of this policy.</p>
7.8.2	<p><i>“New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing:</i></p> <p><i>a) the height, massing, and scale of nearby buildings;</i></p> <p><i>b) the setbacks of buildings from the street;</i></p> <p><i>c) existing cultural heritage character and heritage buildings;</i></p> <p><i>d) the prevailing side and rear yard setbacks;</i></p> <p><i>e) landscaping and open space patterns;</i></p> <p><i>f) the size and configuration of lots; and,</i></p> <p><i>g) the existing/planned street pattern.”</i></p>	<p>This policy seems too restrictive. We encourage the policy to be revised to read “New and infill development will recognize the existing and planned built form context, and <b>be compatible with</b> the character of the area....”</p>
7.8.3	<p><i>“New buildings will be designed and oriented to front onto public streets to support a vibrant, active and pedestrian-oriented streetscape.</i></p>	<p>This policy does not consider site specific context. Wording should be revised to replace “will be” to “are encouraged to be”.</p>





	<i>Buildings on corner sites will address the corner and both street frontage”</i>	
7.9.9	<i>“A minimum tree canopy cover of 30 per cent will be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws.”</i>	With respect to policies 7.9.9 and 7.10.2, what is the basis for applying 30% tree canopy to parking lots and site area respectively?
7.10.2	<i>“All new developments should contribute to the overall tree canopy of the Town by achieving a minimum 30 per cent canopy coverage on the net developable area of the site, at the discretion of the Town. Canopy coverage is to be assessed as defined by the Town Wide Design Guidelines and Green Development Standards.”</i>	
9.1(b)	<i>“The planning objectives for housing, in collaboration with the Region, are as follows: b) maintain and develop purpose-built rental housing through a minimum target of 25 per cent of all new units to be rental in tenure.”</i>	Please provide details related to how the Town determined the 25% threshold purpose built rental units for all new units.
9.5.1	<i>“To support the diversification of housing tenure, the Town will work with the Region to implement the target that a minimum of 25 per cent of all new housing developments be purpose built rental housing.”</i>	
9.5.3	<i>“The conversion of rental housing to condominium or ownership tenure that would result in the loss of six or more rental housing units will not be permitted unless: a) at least the same number, size, affordability and type of rental housing units are replaced and maintained with rents like those in effect at the time the development, redevelopment, or conversion application was made; b) an acceptable tenant relocation and assistance plan addressing the right to return to occupy one of the replacement</i>	Language used in this policy should be softened to ‘not encourage’ conversion unless the criteria are met (rather than to ‘not permit’). It is not feasible to expect that the replacement of rental housing through condo conversions will always meet these criteria. These are good goals to strive for, but should be not be absolutes.  It should be recognized that there may be merit in providing affordable ownership housing without replacing the lost rental housing units. Also, this policy does not



	<i>units at similar rents, the provision of alternative accommodation at similar rents, and other assistance to lessen hardship; or, c) the overall rental vacancy rate for the Town (or the Region of Peel if data is not available for the Town), as reported by the Canada Mortgage and Housing Corporation, has been at or above 3.0 per cent for the preceding four consecutive annual surveys.”</i>	recognize that ownership conversion will also facilitate supply of 2 <sup>nd</sup> dwelling units.
9.9.6 (b)	<i>“9.9.6 Urban Residential Parcels b) Low density residential development applications within or abutting strategic growth areas will aim to provide at least 50 per cent of new single, semi-detached and townhouses with occupancy-ready additional residential units in order to contribute to rental housing stock.”</i>	Policy 9.9.6(b) is challenging to implement on semi-detached units and townhouses since 50% threshold cannot be achieved due to the design nature of these units and the Town side yard setback requirements. This policy should only apply to single detached units.
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14.6.2	<i>“Privately owned publicly accessible spaces contribute to the public realm but remain privately owned and maintained. They do not replace the need for new public parks and open spaces. Privately owned Publicly Accessible Spaces provided through development will: ...h) be eligible for parkland credit.”</i>	While we support staff’s position that POPs should be eligible for parkland credit, consistent with Bill 23, we respectfully disagree with this part of the policy: <i>“They do not replace the need for new public parks and open spaces.”</i> POPs can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.
22.5.3	“Urban Corridors Development Policies - The planned built form characteristics for this designation encourage the development of a wide variety of building forms, generally mid-rise in height, but with higher buildings depending on location. All buildings are intended to have a strong street presence. On this basis, below are the design and built form criteria that will be applied in the Urban Corridors:	Policy 22.5.3(c) should allow more height in Urban Corridors (consider up to 12 storeys or perhaps no limit) since 8 storeys is too restrictive to recognize future unforeseen market conditions.



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24.4	<i>“The Town will prepare terms of reference for block plans and identify</i>	At this time GSAI has no specific comments on this proposed policy.



	<i>specific study requirements through the pre-consultation process for the required official plan amendment. The costs associated with the studies and the preparation of a block plan will be shared equitably among benefitting landowners on a proportional basis. Benefitting landowners who choose not to participate in the preparation of a block plan but later decide to develop their lands will be required to make a financial contribution to the costs of preparing the block plan based on their proportional share."</i>	
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Thank you for the opportunity to provide comments. Please contact the undersigned should you have any questions. We look forward to being involved in the subsequent stages of the Official Plan review.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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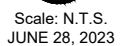
**Karen Bennett, MCIP, RPP**  
**Partner**

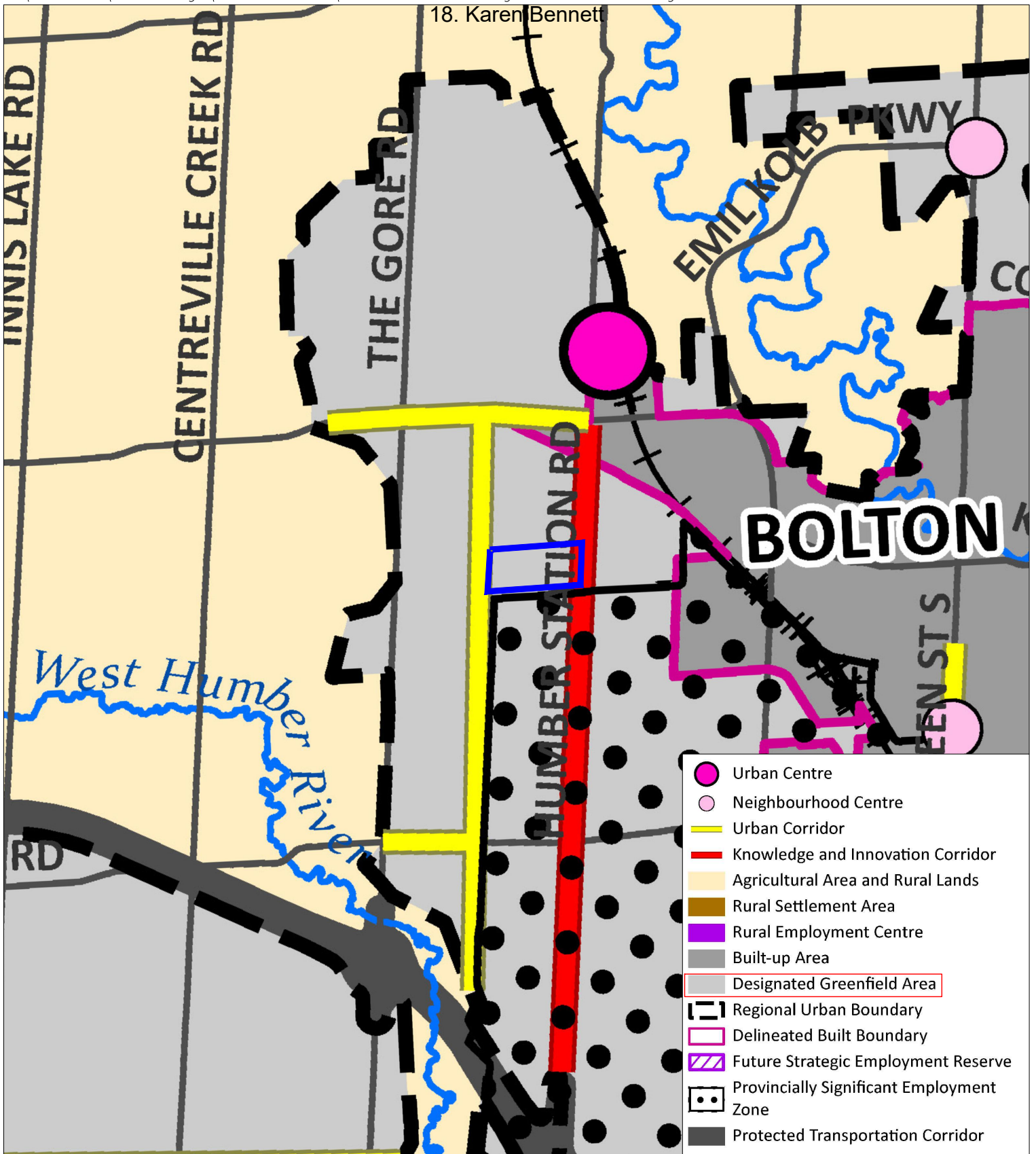
cc. *Gold Humber Station Inc.*  
*K. Sliwa, Dentons Canada LLP*



Part of Lot 9, Concession 4, ALB  
Town of Caledon, Regional Municipality of Peel

 SUBJECT LANDS





**FIGURE 2**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE B2 - GROWTH MANAGEMENT**

Part of Lot 9, Concession 4, ALB  
 Town of Caledon, Regional Municipality of Peel

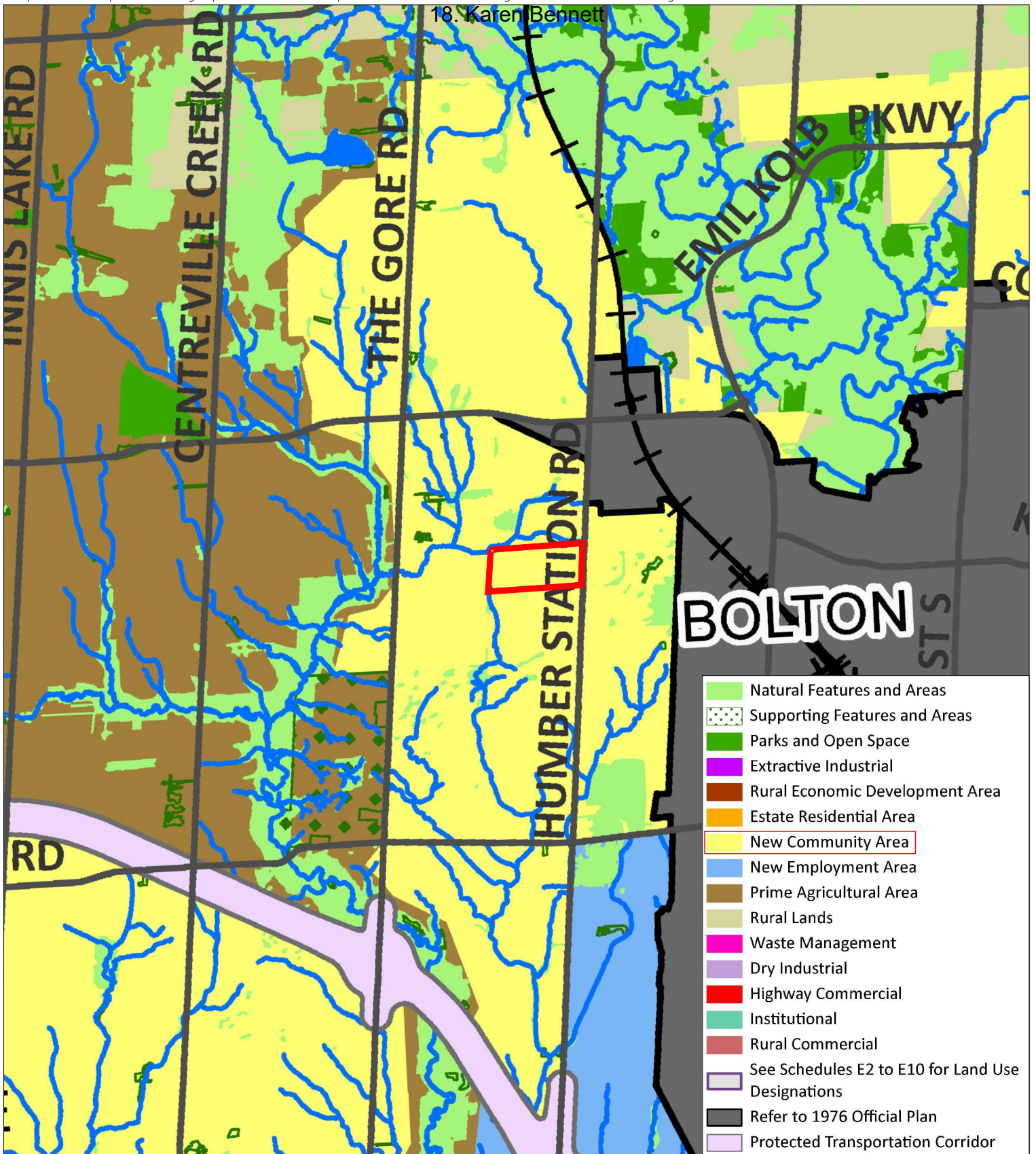
**LEGEND**

 SUBJECT LANDS



Scale: N.T.S.  
 JUNE 28, 2023





**FIGURE 3**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE B4 - LAND USE DESIGNATIONS**

Part of Lot 9, Concession 4, ALB  
 Town of Caledon, Regional Municipality of Peel

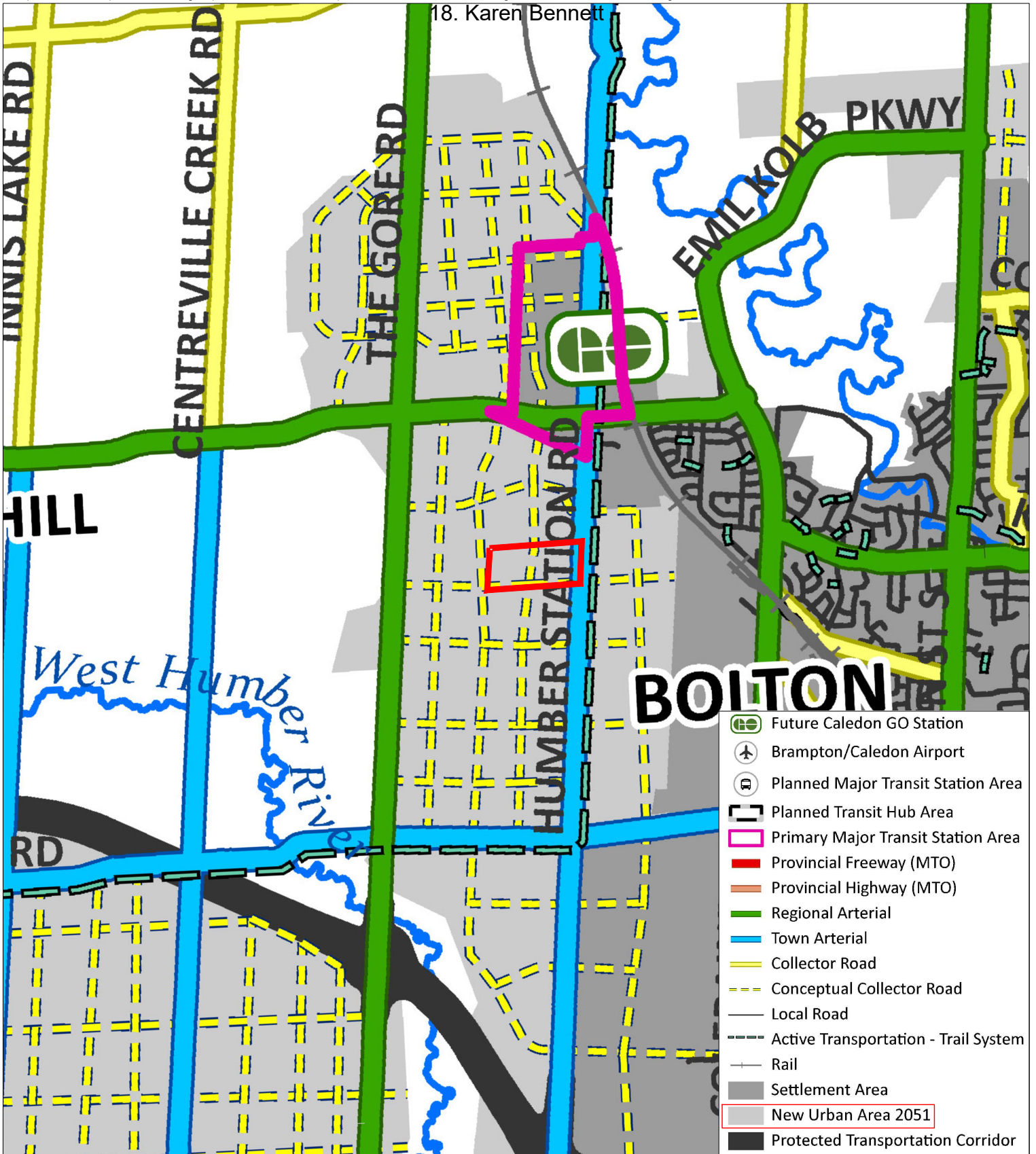
**LEGEND**

SUBJECT LANDS



Scale: N.T.S.  
 JUNE 28, 2023





**FIGURE 4**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE C1 - TOWN WIDE**  
**TRANSPORTATION NETWORK**

Part of Lot 9, Concession 4, ALB  
 Town of Caledon, Regional Municipality of Peel

**LEGEND**

SUBJECT LANDS



Scale: N.T.S.  
 JUNE 28, 2023

August 23, 2023

GSAI File: 1300-001

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: June 2023 Draft Caledon Official Plan  
Lands West of The Gore Road, North of King Street  
14106 The Gore Road, 14098 The Gore Road and 0 King Street  
Formal Submission on Behalf of Landowners  
Town of Caledon**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Flato Gore Meadows Holdings Inc. and 14106 The Gore Road Inc. who own approximately 53.95 acres collectively over three separate, contiguous parcels on the north side of King Street, west of The Gore Road in Caledon (herein referred to as the ‘Subject Lands’). GSAI has been following the Town of Caledon’s Official Plan review process over the last couple of years on behalf of these owners. Please accept our comments now that we have reviewed the Town’s Draft Official Plan, released June 2023.

The Region of Peel Official Plan, approved by the Minister of Municipal Affairs and Housing on November 4, 2022, brought the Subject Lands into the 2051 Urban Area for Community Uses.

Within the updated draft Town of Caledon Official Plan schedules, the Subject Lands are within “Urban Area” with a small linear portion shown as “Natural Environment System” on Schedule B1 (*see Figure 1*), “Designated Greenfield Area” adjacent to an “Urban Corridor” (King Street) on Schedule B2 (*see Figure 2*), and “New Community Area” on Schedule B4 (*see Figure 3*). On the draft Transportation Network Schedule C1, King Street is designated as “Regional Arterial” and there appears to be a future conceptual collector road running N/S through the Subject Lands (*see Figure 4*). It is acknowledged that the draft Official Plan policy in the Official Plan indicates that conceptual collector roads shown per Schedule C1 are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.



We wish to offer the following comments on the draft policy text contained in the June 2023 Draft Official Plan:

Policy Number	Policy Text	GSAI comments
4.3.1	<i>“Development within Designated Greenfield Areas, as identified on Schedule B2, Growth Management, will be designed to meet or exceed a density of 67.5 residents and jobs combined per hectare.”</i>	GSAI notes that this density is higher than the minimum density as per the Growth Plan. Pls advise how the Town arrived at a min density of 67.5 residents and jobs combined per hectare.
4.5.1	<i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.”</i>	It is suggested that these policies are too restrictive and contradict the Planning Act. As per the Act, privately initiated applications, including for a Secondary Plan, are to be received (i.e. municipality can’t refuse receipt of a submission) by a municipality.
4.5.3	<i>“Privately initiated secondary plans will not be permitted.”</i>	We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council may have the discretion to allow privately initiated Secondary Plans on a site by site circumstance.”</i>
4.5.4	<i>“Each secondary planning process will be initiated and led by the Town in accordance with the policies of this Plan, the Region of Peel Official Plan, and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities.”</i>	The revised wording would allow for the flexibility of a privately initiated Secondary Plan to be submitted and processed, where appropriate.
4.5.6	<i>“In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the new 2051 Urban Area until after the structure of a connected transportation system is planned to the Region’s satisfaction, including: a) the conceptual alignment of a transit system that includes an east-</i>	GSAI understands this policy to mean that transportation planning, not construction, is needed prior to any Secondary Plan approval. Please confirm.



	<i>west higher order transit corridor; and, b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway.”</i>	
4.5.7	<i>“In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.”</i>	<p>We are not clear on the origination/ basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that with the unknown future of the Region, there are many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000 additional people a maximum threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>
4.6.1	<i>“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that: a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken by the Region of Peel, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the Designated Greenfield Area; b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan based on the analysis provided in the Region’s land needs assessment, while minimizing</i>	<p>Policies 4.6.1, 4.6.2 and 24.1.3 seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and the Provincial Policy Statement enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>





	<p><i>land consumption;</i></p> <p><i>c) the timing of the proposed expansion and the phasing of development within the Designated Greenfield Area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,</i></p> <p><i>d) the Growth Plan policies on settlement area boundary expansions are satisfied.”</i></p>	
4.6.2	<i>“The establishment of new settlement areas is prohibited.”</i>	
24.1.3	<i>“An official plan amendment to allow a settlement area boundary expansion may only be considered as part of a municipal comprehensive review, and in accordance with section 4.6, Settlement Area Boundary Expansions, of this Plan.”</i>	
5.1.(b)	<p><i>“The planning objectives for climate change mitigation and adaptation are as follows:</i></p> <p><i>b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;”</i></p>	<p>Policies 5.1(b), 5.4.1 and 9.11.1 should be softened to refer to ‘encouraging compliance’ (rather than requiring compliance) with the Green Development Standards (GDSs), and removing the word ‘mandatory’ as it relates to the GDSs. These Standards have only recently been released in draft and have yet to be reviewed and commented on, let alone approved.</p>
5.4.1	<i>“The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.”</i>	<p>Further, these will be guidelines/standards, not policy, and may be amended from time to time without a full public process. Accordingly, policy in the Official Plan should not <u>require</u> compliance with these standards otherwise the policy would have the effect of entrenching the GDSs into the policy planning framework as a test for new developments, and this is not appropriate, as guidelines or standards can be changed at any time without public consultation.</p>
9.11.1	<i>“The Town will implement a series of Green Development Standards in collaboration with community partners, development groups, and the Region to work towards the climate change objectives outlined in Chapter 5, Climate Change, of this Plan. All</i>	<p>Using language such as “requiring” is too onerous/restrictive. It should change to</p>





	<i>proposed housing developments will subject to review based on these standards.”</i>	“encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).
5.2.4	<i>“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”</i>	<p>Release of a Terms of Reference document by the Town for this type of study is essential before we can offer support for this policy. In fact, It is suggested that in every instance where the Official Plan policy refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p> <p>Furthermore, the word “required” should be replaced with the word “encouraged”.</p>
5.4	Green Development Standards section	<p>Same concerns as noted above. Language such as ‘encourage’ or ‘promote’ are supported, rather than ‘require’ (which can prove too onerous or restrictive) as it relates to these Standards.</p> <p>The GDSs should not be treated as a test for the proponent but a working document for the Town and the development industry to use as a reference for achieving sustainability.</p>
7.1. a)	<i>“...To ensure this, new communities and developments will: i) protect natural features and areas as contiguous systems, wherever possible; ii) enhance the resiliency of natural features and areas through buffers and site design; iii) conserve cultural heritage resources in context, wherever possible, and adapt built form to them;</i>	Sub-policies ii) through v) should also include the language “wherever possible”.



	<p><i>iv) integrate existing landforms, uses, landmarks and significant site features; and,</i></p> <p><i>v) respect context and important viewshed through setbacks, siting and design.”</i></p>	
7.1.b iv	<p><i>“To prioritize the long term benefits of growth focused around existing settlement areas, the Town will:</i></p> <p><i>iv. apply the highest applicable standards in architecture and landscape architecture”</i></p>	<p>We request this policy be reviewed to ensure it is consistent with Bill 23, particularly with respect to the delivery of housing and addressing the current housing crisis.</p>
7.2.10	<p><i>“School sites will, where possible, be co-located with other public service facilities, such as parks and community centres, in a manner that supports their development as community hubs, focal points for the community and neighbourhood gathering places.”</i></p>	<p>This is a positive and supportable policy. Early discussion, coordination and consultation with the school boards is recommended to ensure the success of implementation of this policy.</p>
7.8.2	<p><i>“New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing:</i></p> <p><i>a) the height, massing, and scale of nearby buildings;</i></p> <p><i>b) the setbacks of buildings from the street;</i></p> <p><i>c) existing cultural heritage character and heritage buildings;</i></p> <p><i>d) the prevailing side and rear yard setbacks;</i></p> <p><i>e) landscaping and open space patterns;</i></p> <p><i>f) the size and configuration of lots; and,</i></p> <p><i>g) the existing/planned street pattern.”</i></p>	<p>This policy seems too restrictive. We encourage the policy to be revised to read “New and infill development will recognize the existing and planned built form context, and <b>be compatible with</b> the character of the area....”</p>
7.8.3	<p><i>“New buildings will be designed and oriented to front onto public streets to support a vibrant, active and pedestrian-oriented streetscape.</i></p>	<p>This policy does not consider site specific context. Wording should be revised to replace “will be” to “are encouraged to be”.</p>



	<i>Buildings on corner sites will address the corner and both street frontage”</i>	
7.9.9	<i>“A minimum tree canopy cover of 30 per cent will be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws.”</i>	With respect to policies 7.9.9 and 7.10.2, what is the basis for applying 30% tree canopy to parking lots and site area respectively?
7.10.2	<i>“All new developments should contribute to the overall tree canopy of the Town by achieving a minimum 30 per cent canopy coverage on the net developable area of the site, at the discretion of the Town. Canopy coverage is to be assessed as defined by the Town Wide Design Guidelines and Green Development Standards.”</i>	
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Yours very truly,

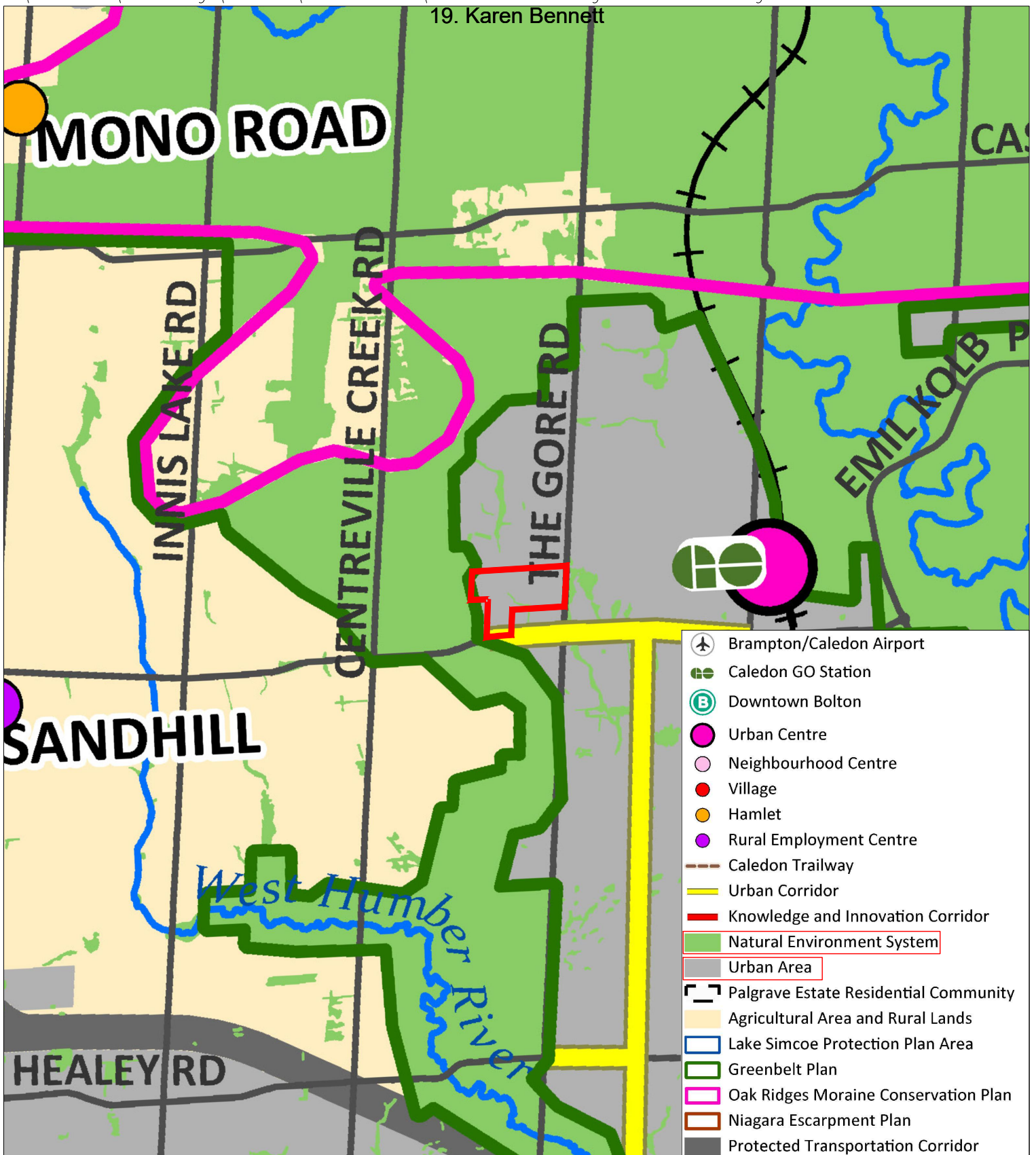
**GLEN SCHNARR & ASSOCIATES INC.**

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**Karen Bennett, MCIP, RPP**  
**Partner**

cc. Flato Gore Meadows Holdings Inc.  
14106 The Gore Road Inc.





**FIGURE 1**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE B1 - TOWN STRUCTURE**

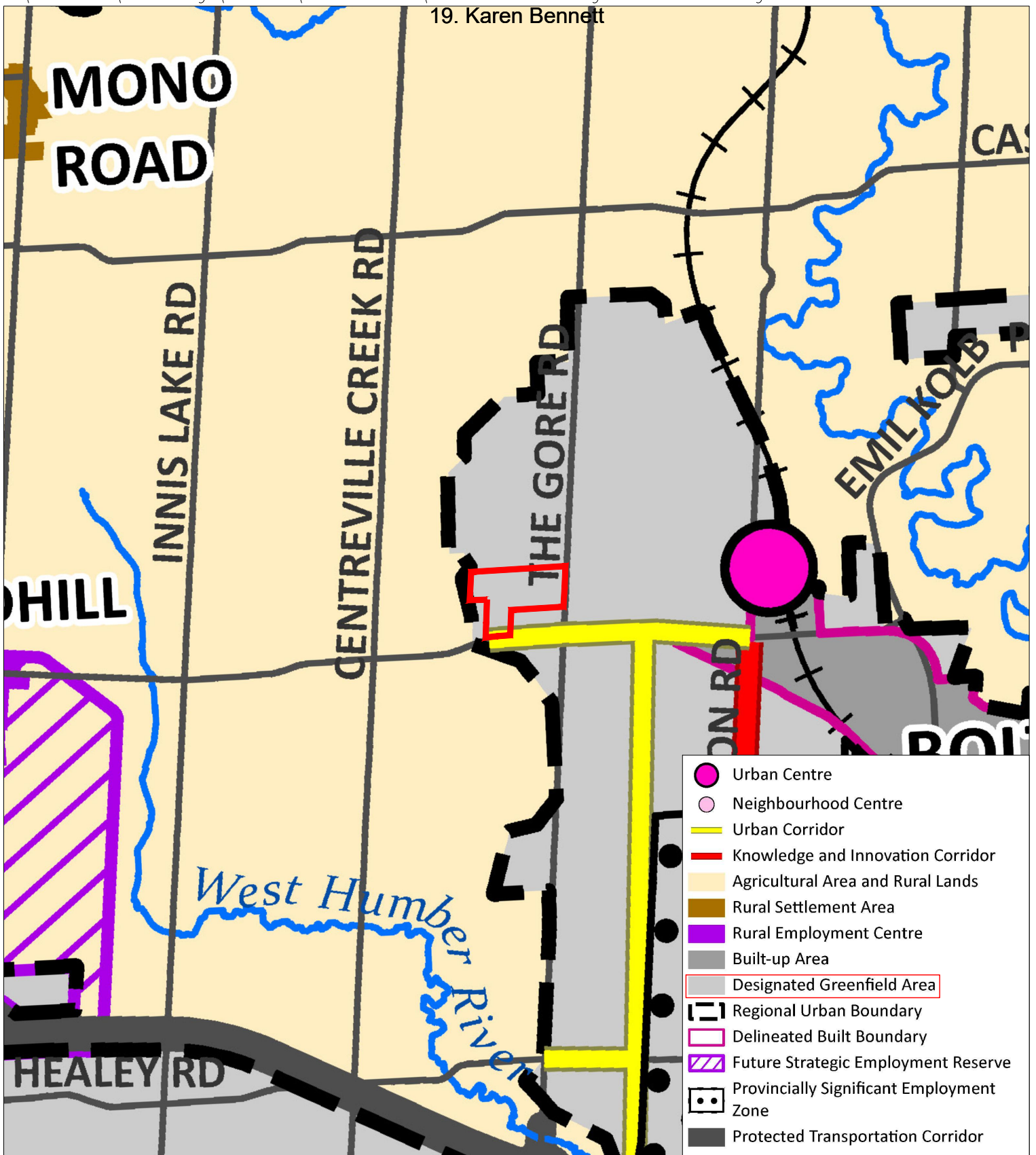
14106 & 14098 The Gore Road & 0 King Street,  
 Town of Caledon, Regional Municipality of Peel

**LEGEND**

**SUBJECT LANDS**



Scale: N.T.S.  
 JUNE 28, 2023



**FIGURE 2**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE B2 - GROWTH MANAGEMENT**

14106 & 14098 The Gore Road & 0 King Street,  
 Town of Caledon, Regional Municipality of Peel

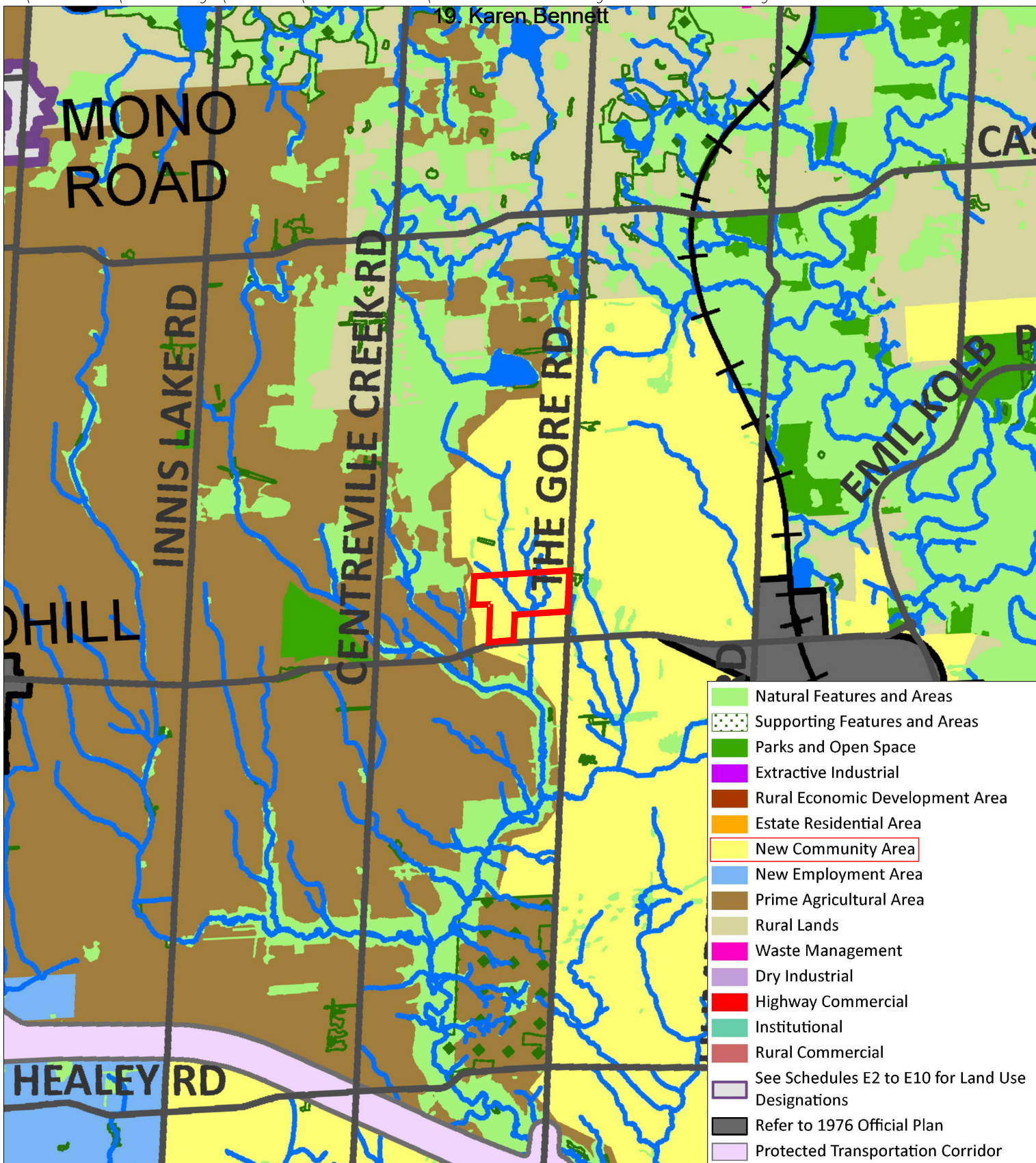
**LEGEND**

**SUBJECT LANDS**



Scale: N.T.S.  
 JUNE 28, 2023





**FIGURE 3**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE B4 - LAND USE DESIGNATIONS**

14106 & 14098 The Gore Road & 0 King Street,  
 Town of Caledon, Regional Municipality of Peel

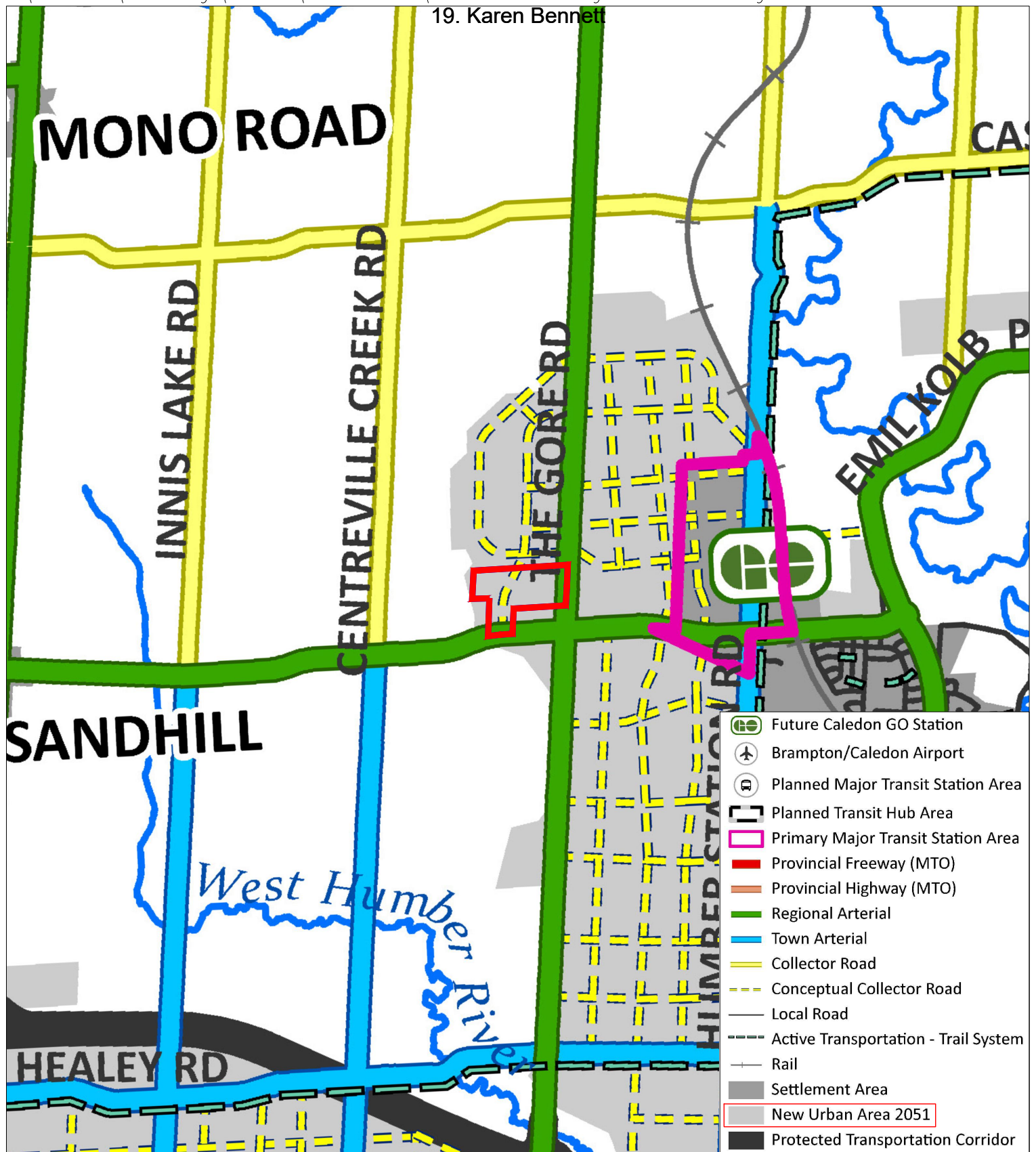
**LEGEND**

**SUBJECT LANDS**



Scale: N.T.S.  
 JUNE 28, 2023

19. Karen Bennett



**FIGURE 4**  
**CALEDON DRAFT OFFICIAL PLAN (JUNE, 2023)**  
**SCHEDULE C1 - TOWN WIDE**  
**TRANSPORTATION NETWORK**

14106 & 14098 The Gore Road & 0 King Street,  
 Town of Caledon, Regional Municipality of Peel

**LEGEND**

SUBJECT LANDS



Scale: N.T.S.  
 JUNE 28, 2023





1547 Bloor Street West  
 Toronto, Ontario M6P 1A5  
 ☎ (416) 923-6630  
 ✉ info@sglplanning.ca

August 23, 2023

Project: CE.CL

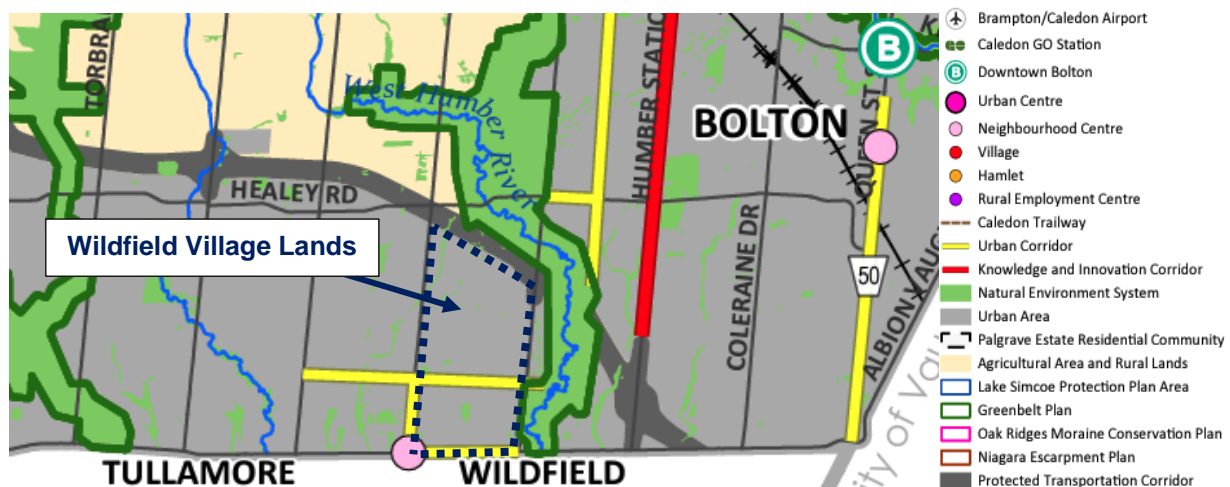
## VIA EMAIL

Steve Burke  
 Manager, Strategic Policy Planning  
 Town of Caledon  
 6311 Old Church Road  
 Caledon, Ontario  
 L7C 1J6

### Re: Second Draft Caledon Official Plan Comments on Behalf of the Wildfield Village Landowners Group

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. Based on our review of the Town's second draft Official Plan, which was released in June 2023, this letter sets out our comments and recommendations on behalf of Wildfield Village.

We continue to support the identification of the Wildfield Village lands as "Urban Area" on Schedule B1: Town Structure, "Built Up Area" on Schedule B2: Growth Management and "Community Area" on Schedule B4: Land Use Designations. We are also supportive of the identification of a Neighbourhood Centre at the intersection of Mayfield Road and Centreville Creek Road, as well as the Urban Corridors identified along Mayfield Road, along the southern half of Centreville Creek Road and traversing the Wildfield Village lands east-west. We understand the exact location and boundaries of these elements will be determined through the secondary planning process. However, we would like to ensure that the location of the Urban Corridor traversing east-west along the Wildfield Village lands is flexible and will be determined in the secondary plan.



Draft Caledon Official Plan Schedule B1 – Town Structure

The following sets out our comments on specific policies of the Town's draft Official Plan:

**Secondary Plans - Policy 4.5.4:** According to Policy 4.5.4, each secondary planning process will be initiated and led by the Town in accordance with the Town and Region's Official Plans and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities. We request that the Official Plan instead acknowledge a hybrid municipal/landowner process through participation by landowners and developers throughout the entire secondary plan process, including the preparation of background studies, the land use concepts and also the secondary plan policies, as we have discussed with Town Staff.

**Secondary Plans - Policy 4.5.6 and 4.5.7:** The draft Caledon Official Plan reflects the Peel Region Official Plan in not allowing any secondary plans to be approved in the 2051 New Urban Area until after the structure of a connected transportation system is planned to the Region's satisfaction. Secondary plans of more than 10,000 new units will not be approved until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region's satisfaction. It is unclear how this policy direction will be implemented once Peel Region has been dissolved. Depending on the extent of this comprehensive transportation and transit system structure, awaiting Regional approval could cause a significant delay for the development of much needed housing in Caledon. Secondary planning will help provide detail on the location and function of the Town's overall transportation and transit system which can then feed into the financing mechanisms. Secondary plans should be allowed to be approved prior to the approval of the financing mechanisms for the local transit system..

**Parks and Open Space – Section 14:** We request the Official Plan policies ensure flexibility in the shape of parks and how they address the Natural Heritage System.

**Urban Corridor Designation – Policy 22.5.2:** Ground-related medium density residential uses may be permitted towards the rear of Urban Corridors (which are anticipated to be approximately 100 metres in depth on either side of the road). There are numerous Urban Corridors identified within Caledon, including three within Wildfield Village. Is the Town's intent to only allow taller mixed use and residential buildings along the frontage of these new Urban Corridors? Buildings up to 8 storeys are permitted. There is unlikely to be a market for mid-rise buildings along all corridors and within the Urban and Neighbourhood Centres. Greater flexibility is required with the detail to be set out in the secondary plans.

**Neighbourhood Area Designation – Policy 22.7.3 e):** Buildings in low-rise areas shall generally not exceed 3 storeys in height, however, buildings as high as 12 storeys may be permitted on mixed use sites. This height permission is higher than the maximum 8 storeys permitted along Urban Corridors and 10 storeys in Neighbourhood Centres which does not make much sense. The permission for 12 storeys, assumed to be on the periphery of low-rise areas (which would apply to The Gore Road and lands along Highway 413 within Wildfield Village, among other potential areas) may detract from the purpose of identifying Centres and Corridors and the market for mid-rise buildings in the Centres and Corridors. It is unclear why 12 storeys is permitted in Neighbourhood Areas and not in Centres and Corridors. This land use approach should be revised and further evaluated to determine a more appropriate distribution of height permissions for Neighbourhood Areas, Centres and Corridors.



**Block Plans and Comprehensive Development Plans – Policy 24.4 and 24.5:** It is recommended that the Town's proposed Secondary Plan and subsequent Block Plan process be combined into one process, which should provide enough detail to not require two separate processes. Secondary and Block Plans should also be able to provide detail for Centres and Corridors so that a separate Comprehensive Development Plan is not required. Requiring a Block Plan following a Secondary Plan is time consuming and will delay the implementation of needed housing. We would be supportive of a Secondary and Block Plan streamlined approach.

Thank you for the opportunity to provide comments on the Town's second draft Official Plan. We will continue to participate in the Town's Official Plan Review process and provide further comments. We look forward to working with Town Staff on the Secondary Plan to deliver the creation of a vibrant, complete community within Caledon's new Urban Area.

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



Paul Lowes, MES, MCIP, RPP

c.c. Antonietta Minichillo, Town of Caledon  
Bailey Loverock, Town of Caledon  
Glenn Pitura, Wildfield Landowners Group



August 25, 2023

Sent via email [Steven.Burke@caledon.ca](mailto:Steven.Burke@caledon.ca)

The Corporation of the Town of Caledon  
c/o City Clerk's Department  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

Attention: Steve Burke, Manager, Strategic Policy Planning

Re: **Review and Comments on the "Draft Future Caledon Official Plan –  
June 2023"**  
**Town of Caledon (the "Town") and the Region of Peel (the "Region")**

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We are writing to you on behalf of our client, Aecon Infrastructure Management Inc. (the "Client") with respect to lands in the Town of Caledon (the "Town"), more commonly referred to as Aggregate Pit #6506 (the "Caledon Pit"). The Caledon Pit is currently owned by Aecon Infrastructure Management Inc. and is actively running as an aggregate and extraction site. The Caledon Pit is located on the peripheries of the Caledon Village Settlement Boundary within Concession 1, 2 and 3 in the Town of Caledon. The Caledon Pit is generally located south of Charleston Sideroad, north of West Caledon Pit #6622, west of Hurontario Street, and east of Fork of the Credit Provincial Park (Refer to **Schedule A**). The Caledon Pit has a total area of 572 hectares (1,413 acres) and is bound by the Caledon Village community.

The aggregate operation at Caledon Pit is active and ongoing. However, certain parts of the operation will be concluded in the near future, allowing the Client to begin its rehabilitation process. Aecon is exploring opportunities for the reuse of the Caledon Pit to contribute to the development of much needed housing and facilitate the desired growth in the Caledon Village area.

The objective of this letter is to provide our comments regarding the June 2023 Draft Future Caledon Official Plan, which was released on June 21<sup>st</sup>, 2023. The intention is to ensure that Caledon Official Plan Policies recognize the opportunities available surrounding the Caledon Pit redevelopment, and to allow for a more supporting framework that aids in fostering the Clients vision, for a more intensified form of development. We understand that there is on-going review of the Official Plan and that a third draft will be released in late August 2023, followed by public open houses and a public meeting hosted by Council in September 2023. Council adoption is targeted for late fall or early 2024.



## **Key Draft Policies and our Responses**

### *Settlement Area Boundary Expansions*

- The Caledon Pit lands are currently located outside of the Caledon Village Settlement Area Boundary and are currently designated an “Extractive Industrial”. A portion of the Caledon Pit namely the properties fronting onto Hurontario St. are bounded by existing residential and proposed residential development which are designated as Rural Neighborhood sites within the Caledon Village Community. Policy 4.6.1 of the Draft OP states that Settlement Area Boundary Expansions may only occur through a municipal comprehensive review conducted by the Region. The Ministry of Municipal Affairs and Housing is consulting on proposed policies for an integrated province-wide land use planning policy document. In this regard, proposed policy changes in the new Provincial Policy Statement (the “2023 PPS”) would remove the requirement for settlement areas to be expanded or established in the form of a Municipal Comprehensive Review (“MCR”). Instead, the proposed new policies will allow for such expansions to be proposed and considered through Official Plan Amendments initiated at any time based on more suitable, stream-lined criteria.

**Response:** In our opinion, the Draft OP should reflect the new 2023 PPS policies and the criteria of the new 2023 PPS as it relates to Settlement Area Boundary Expansions.

### *Other Natural and Human-made Hazards*

- Policy 16.6.1 states that the Town will prohibit, where appropriate, development on, abutting, or adjacent to lands affected by human-made hazards such as oil, gas, and salt hazards, or former mineral aggregate operations, in accordance with the objectives and policies in this Plan and provincial policy.

**Response:** The Town of Caledon’s RMP contemplates future development of former aggregate sites. We would encourage the Town to consider flexible policy language as it relates to the rehabilitated aggregate sites and former mineral aggregate operations as extensive studies, or site investigations must be undertaken to advance the development on former aggregate sites and the subsequent conversion to support residential/employment development.

### *Caledon High Potential Mineral Aggregate Resource Area Mapping/Criteria*

- Policy 20 indicates that Mineral Aggregate Policies will be added through a future phase of the Official Plan Review.

**Response:** In our opinion, the Mineral Aggregate Policies should be continued to be developed in conjunction and aligned with the policies expressed in the Rehabilitation Master Plan (the “RMP”) in the next Draft OP. The RMP contemplates future development for community uses on a portion of the aggregate sites surrounding Caledon Village, and the Caledon OP should reference and acknowledge this opportunity. The RMP represents a comprehensive approach to the reuse of



aggregate sites surrounding Caledon Village, including a portion of Caledon Pit lands. The RMP envisions a future where former extraction sites are integrated within the community through a range of land uses, including residential uses.

*Future Strategic Employment Area*

- Policy 23.4.4 states that the Regional Urban Boundary may only be expanded to include Future Strategic Employment Areas only through a Region of Peel Official Plan Amendment and municipal comprehensive review initiated by the Region.

**Response:** The concept of municipal comprehensive reviews of official plans have not been carried forward into the 2023 PPS. The 2023 PPS will provide municipalities with greater control over employment area conversions to support the forms of development and job creation that suit the local context. Further, with the introduction of Bill 112: the Hazel McCallion Act, there will not be a requirement for the Region to be involved in the planning of the Town of Caledon.

We would like to again acknowledge the work the Town of Caledon staff have done to develop the Draft Caledon Official Plan and for your consideration of our comments. Thank you for your time and consideration of our comments and proposed changes. Should you have any questions, please do not hesitate to contact the undersigned.

Yours Very Truly,

*Andrew Lam*

Andrew Lam, BURPI

**Delta Urban Inc.**

cc. Peter Karczmarczyk, Aecon Construction Group Inc.  
 Alex Lusty, Davies Howe LLP  
 Meaghan McDermid, Davies Howe LLP  
 Mustafa Ghassan, Delta Urban Inc.  
 Roman Winnicki, Delta Urban Inc.

*Enclosed.*      Schedule A – Caledon Aggregate Pit #6506 Lands



## Schedule A: Caledon Aggregate Pit #6506 Lands







Matthew Cory  
905 513 0170 x116  
mcory@mgp.ca

September 14, 2023

MGP File: 21-3130

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

via email: [antonietta.minichillo@caledon.ca](mailto:antonietta.minichillo@caledon.ca) / [opreview@caledon.ca](mailto:opreview@caledon.ca)

**Attention: Ms. Antonietta Minichillo**  
**Chief Planner/Director of Planning**

Dear Ms. Minichillo:

**RE: Future Caledon Official Plan Review Comments**  
**Brookvalley Project Management Inc.**  
**Mayfield West Phase 2 – Stage 3**

Malone Given Parsons Ltd. (“MGP”) are the planning consultants for Brookvalley Project Management Inc. (“Brookvalley”), who manage six parcels of land totaling approximately 202 hectares within Phase 2 of the Mayfield West Study Area in the Town of Caledon (the “Brookvalley Lands”).

On behalf of Brookvalley, we have been monitoring the Future Caledon Official Plan review process, including attendance and participation at the Caledon Public Open House held on March 30, 2022 and the Statutory Public Meeting held on April 11, 2022. We also provided written comments to the Town on April 22, 2022.

First, we would like to thank staff for incorporating some of the comments we had previously provided, specifically pertaining to the GTA West Corridor transition policy and the re-designation of a portion of Brookvalley’s Lands from “Prime Agricultural Area” to “Rural Lands” consistent with the Peel Region Official Plan that was approved by the Province in November 2022. On behalf of Brookvalley, we have reviewed the Draft Future Caledon Official Plan (“Draft FCOP”), dated August 2023 and would like to make the following additional comments as it relates to the proposed policy framework and schedules.

## **1.0 Secondary Plan Areas**

The current Draft FCOP does not incorporate the Secondary Plan areas in the policy framework or in the schedules and instead refers back to the policies in the existing Official Plan. It is our understanding that the Draft FCOP is proposed to consist of multiple volumes, with Volume 1 including Town-wide policies and planning designations; Volume 2 including in-effect Secondary Plans; and Volume 3 including all Site and Area Specific Policies. We also understand that the Town will be reviewing the policies for the existing Secondary Plan areas

as part of Phase 3 of their Official Plan Review, however, until then the Secondary Plan areas remain subject to the existing Town of Caledon Official Plan.

It is our opinion that the final Draft FCOP to be presented to Council should incorporate the existing and future Secondary Plan areas into one consolidated document to avoid confusing and conflicting policy language between multiple documents. As is the case with the structure of the City of Markham Official Plan, references to previous official plan documents leads to convoluted policy interpretations that should be avoided with producing one comprehensive document.

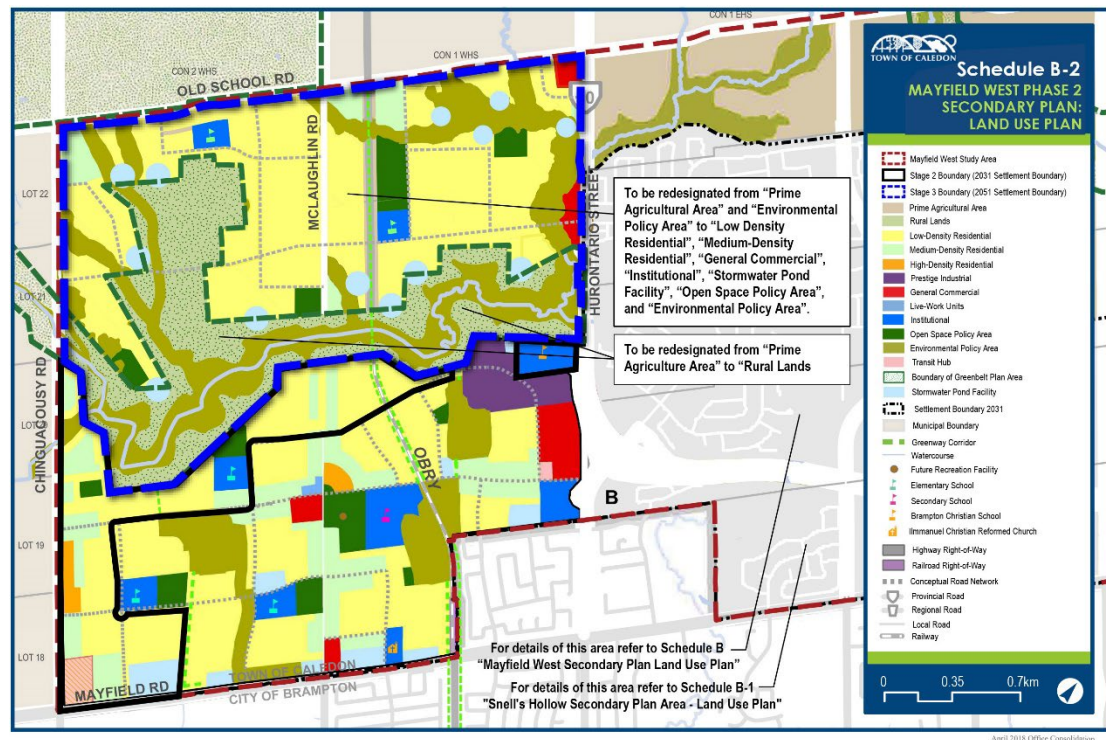
Currently, the Draft FCOP does not support privately initiated Secondary Plans, in accordance with Section 21.4.2. We request that this requirement be omitted from the Draft FCOP or revised to permit privately initiated Secondary Plans on the basis that these Secondary Plans would follow Terms of Reference prepared in collaboration with the Town. Expediting the Secondary Plan process will aid the Town and province in attaining a greater supply of housing units to offset the affordable housing issues stemming from a lack of supply.

Furthermore, in areas where extensive and comprehensive planning has occurred, we do not believe a Secondary Plan process is required to provide detailed land use designations on the New Community Area lands. Brookvalley's lands within the Mayfield West Phase 2 – Stage 3 portion of the Mayfield West Study Area are one such instances, which has a long-standing planning history, has been comprehensively studied and represents the logical completion of existing neighbourhoods and communities. In July 2022, Brookvalley submitted an Official Plan Amendment (“OPA”) Application for their lands known as Mayfield West Phase 2 – Stage 3 which was supported by a number of technical studies.

As such, we request that the Town review the studies undertaken as part of the OPA application and re-designate the lands from “New Community Area” in Schedule F1 – Urban System to “Low Density Residential”, “Medium Density Residential”, “General Commercial”, “Institutional”, “Stormwater Pond Facility”, “Open Space Policy Area”, and “Environmental Policy Area”, as shown in Figure 1 below, to allow for continuity in planning and the logical completion of the Mayfield West Phase 2 community. There has been a sufficient amount of work undertaken for the Mayfield West Phase 2 – Stage 3 lands and as such an additional secondary plan process should not be required.

Moreover, we request that the Town consolidate the three proposed volumes of the Draft FCOP into one comprehensive document, which will include the Mayfield West Phase 2 Secondary Plan policies in the single Draft FCOP document. The Mayfield West Phase 2 Secondary Plan schedule should be subsequently updated and expanded to include the Mayfield West Phase 2 – Stage 3 lands and apply the proposed land use designations as shown on Figure 1.

Figure 1: Proposed Amendment to Schedule B-2



Note: Refinements have been made to the Proposed OPA to reflect the additional review undertaken since the initial submission of the OPA Application in July 2022

## 2.0 Minister's Zoning Orders

We would like to request that the schedules of the Draft FCOP include the identification of lands that are subject to approved Minister's Zoning Orders ("MZOs"). Furthermore, the Draft FCOP should include a policy that provides direction for when the policies of the Official Plan and the MZO conflict, the provisions in the MZO should prevail and that the development of the lands that are subject to a MZO will occur within the terms of an agreement between the Town and the landowner, as appropriate.

## 3.0 Transportation

Despite not providing detailed land use designations, the Town has provided a conceptual collector road network for the lands designated as New Community Areas and New Employment Areas on Schedule C1 – Town-wide Transportation Network. Such depiction of the road network should not occur in the absence of detailed land use designations that inform a logical street network. Should the Town continue to illustrate the proposed collector road network on Schedule C1, it should align with the road pattern and configuration delineated in Brookvalley's proposed OPA, as the network was prepared in accordance with the recommendations of the transportation study submitted in support of the OPA application.

It should also be noted that the collector road networks shown on the Brookvalley Lands on Schedule C1 differs from the road network shown on Schedule F1 – Urban System. The road networks, if shown, should also align with each other.

As indicated through the GTA West Corridor consultation process, we request that Route S4-2 be carried forward as the preferred route alternative for Section 4 of the GTA West Corridor, which is included as Attachment A of this letter. We also request that it be modified to straighten the alignment to be north of Old School Road and outside of the Mayfield West Study Area, to avoid limiting the development of the lands at the northwest corner of the Mayfield West Study Area and eliminate the interchange at Chinguacousy Road to provide a more efficient route along the corridor.

#### **4.0 Natural Heritage**

The Draft FCOP currently includes several schedules that identify significant environmental feature limits. With respect to the Natural Heritage System policies, we are supportive of the policies included in the Draft FCOP that permit refinement of the Natural Heritage System without amendment to the Official Plan.

It is our opinion that mapping within New Community Areas should be based on site-specific conditions and mapping, where available, in the new Draft FCOP, as is the case for the Brookvalley Lands.

Through our review, the below schedules should ensure alignment with the work provided through Brookvalley's OPA application (which is included in Attachment B):

- Schedule D1 – Natural Environment System
- Schedule D2 – Natural and Supporting Features and Areas
- Schedule D3 – Water Resources System Areas
- Figure D1 – Greenbelt Plan Natural Heritage System

#### **5.0 Growth Management and Phasing**

It is our understanding that the Town of Caledon is undertaking a Growth Management and Phasing Plan to determine the staging and sequencing of development. Within the Mayfield West Study Area, the Town and landowners have started to realize Phase 2 Stages 1 and 2. As such, we are continuing to request that the completion of the Mayfield West Phase 2 – Stage 3 community and other areas with a similar long-standing planning history and intention to accommodate growth, including the Bolton Residential Expansion Study Lands (ROPA 30), be prioritized in advance of newer expansion areas to allow for continuity in planning and the logical and sequential completion of the community. Additionally, the services constructed for Phase 2 Stages 1 and 2 have been oversized to accommodate for future growth within the Mayfield West Phase 2 – Stage 3 lands and are available for immediate servicing.

#### **6.0 New Provincial Planning Statement, 2023**

Lastly, it is our opinion that the Draft FCOP should be aligned with the new Provincial Planning Statement (2023 PPS). The proposed 2023 PPS intends to consolidate the existing Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe

(the "Growth Plan"). As such, the policies of the Draft FCOP should remove all reference to the Growth Plan, to remain consistent with this new policy direction of the 2023 PPS.

Numerous sections throughout the Draft FCOP directly refer to the Growth Plan as a guiding a document for developing relevant policies and schedules, which should be removed as part of any future Draft or Final FCOP.

We would like to commend staff on their efforts so far and look forward to working with you through the remainder of the Future Caledon Official Plan Review process. If you have any questions or would like to meet to discuss the content of this letter, please do not hesitate to contact me.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

cc: Bailey Loverock, Town of Caledon  
Steve Burke, Town of Caledon  
Frank Filippo, Brookvalley Project Management Inc.  
Nick Cortellucci, Brookvalley Project Management Inc.

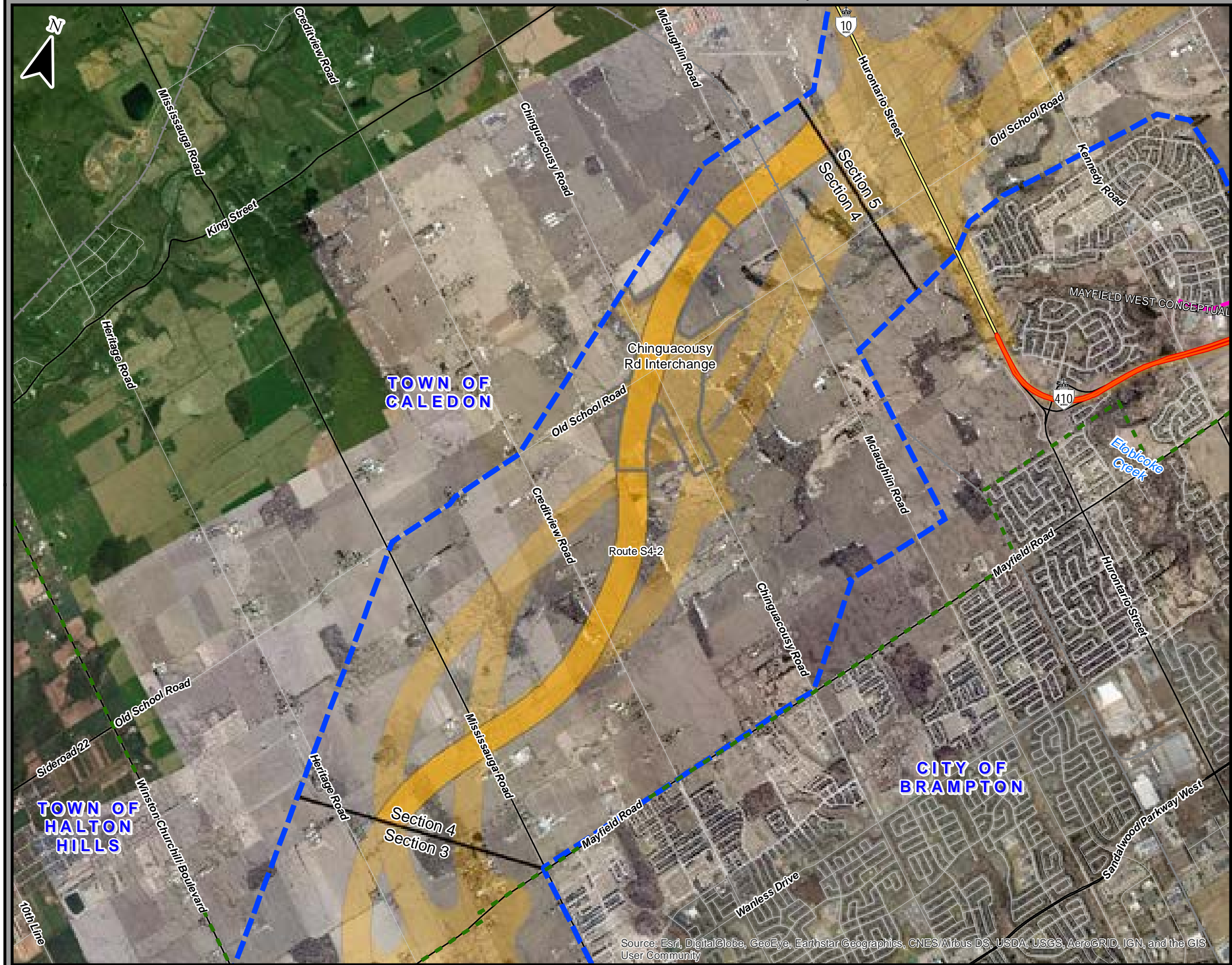
Attachments:

Attachment A: Route S4-2, GTA West Corridor

Attachment B: Mayfield West Phase 2 – Stage 3 Significant Environmental Features



2019/08/16  
AECOM \\vat113f56001\prod\Aecom\Projects\60347240\900-CAD\_GIS\920-929 (GIS-Graphics)\920-ENV\Design\01\_Reports\PCMXD\60347240\_GTAW\_Alternatives\_ShortList.mxd



GTA West

Legend

- Railway
- Freeway
- 407 ETR
- Future Highway 427 Extension
- Highway
- Arterial Road
- Local Road
- Section Boundary
- Planned Municipal Improvements
- Municipal Boundary
- Route Planning Study Area
- Featured Route Alternative
- Conceptual Interchange Footprint
- Short List of Route Alternatives

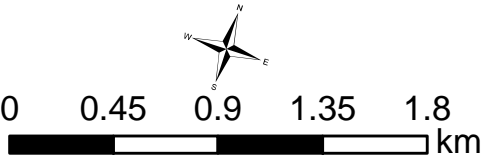
DRAFT

**Sources:**  
 Regional Municipality of York, Regional Municipality of Peel, Regional Municipality of Halton, Township of King, City of Vaughan, Town of Caledon, City of Brampton, City of Mississauga, Town of Halton Hills, Town of Milton

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Alternative Route S4-2

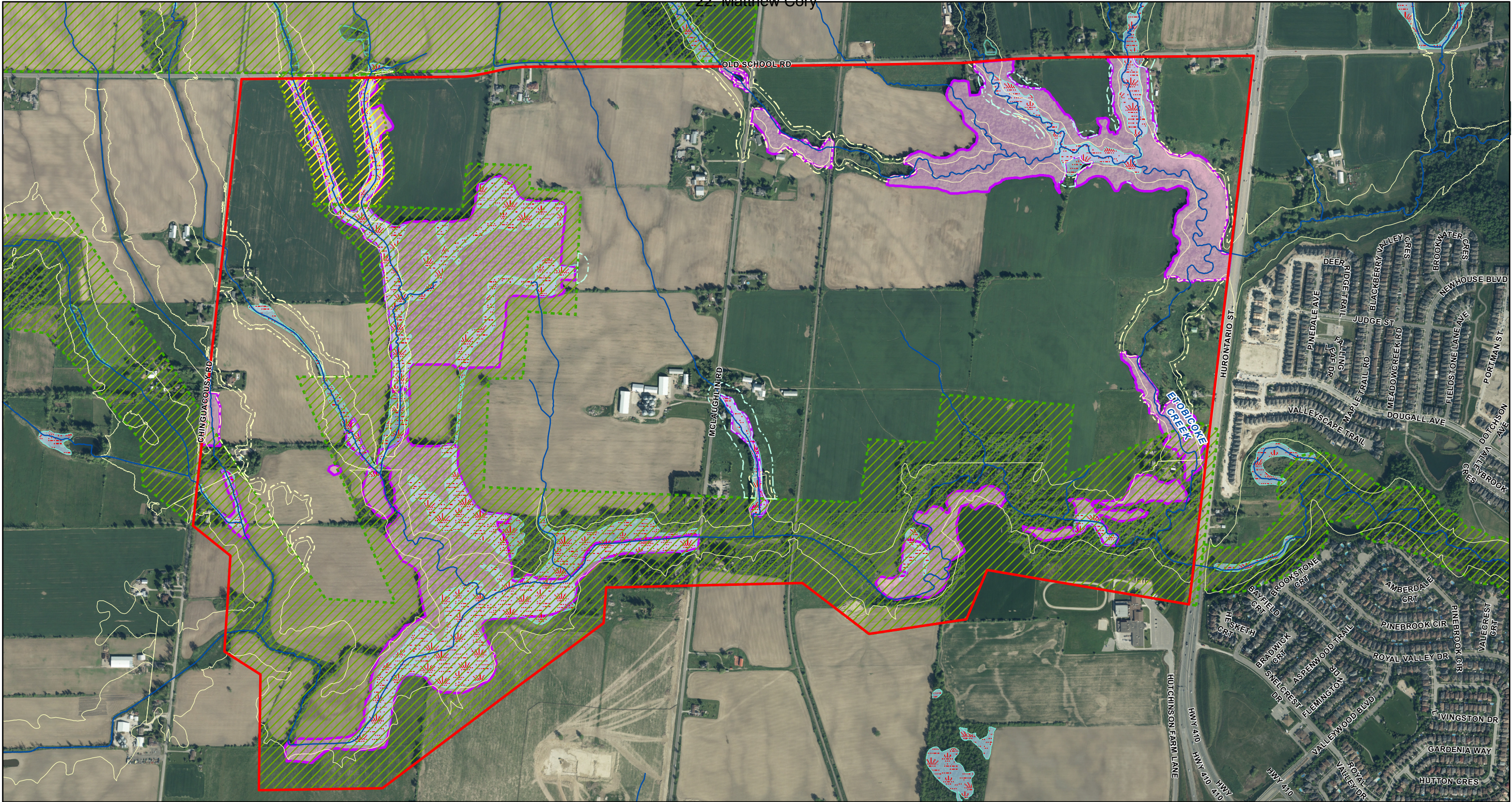
Page 11 of 47  
 September 2019



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



22. Matthew Cory

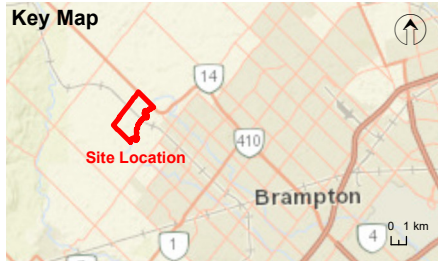


LEGEND

- Watercourse <sup>1</sup>
- Wetland: Not Evaluated
- Wetland: Evaluated-Provincial
- Study Area (NHS)
- Woodland and Wetland (feature limits to be staked at EIR stage)
- Floodplain <sup>4</sup>
- Floodplain Setback (10 m)
- Provincially Significant Wetland Setback (30 m)
- Greenbelt NHS <sup>3</sup>
- Growth Plan NHS
- Woodland and Wetland Setback (to be confirmed at EIR stage)

1 - Ontario Hydro Network (OHN )  
2 - Land Information Ontario (LIO)  
3 - Toronto and Region Conservation Authority (TRCA)

DRAFT




North American Datum 1983  
Universal Transverse Mercator Projection Zone 17

Scale: 1:10,000  
Page Size: Tabloid (11 x 17 inches)

Drawn: SM  
Checked: DJ  
Date: Jun 29, 2022

Source Notes: Base imagery (2020) provided by Peel region GIS services.



CLIENT	Brooke Valley Homes		
PROJECT	Mayfield West Phase 2		
TITLE	Significant Natural Heritage Features		
	REF. NO.	1701602-4-1	
	Figure 4 B433		





Matthew Cory  
905 513 0170 x116  
mcory@mgp.ca

September 14, 2023

MGP File: 21-3130

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

via email: [antonietta.minichillo@caledon.ca](mailto:antonietta.minichillo@caledon.ca) / [opreview@caledon.ca](mailto:opreview@caledon.ca)

**Attention: Ms. Antonietta Minichillo**  
**Chief Planner/Director of Planning**

Dear Ms. Minichillo:

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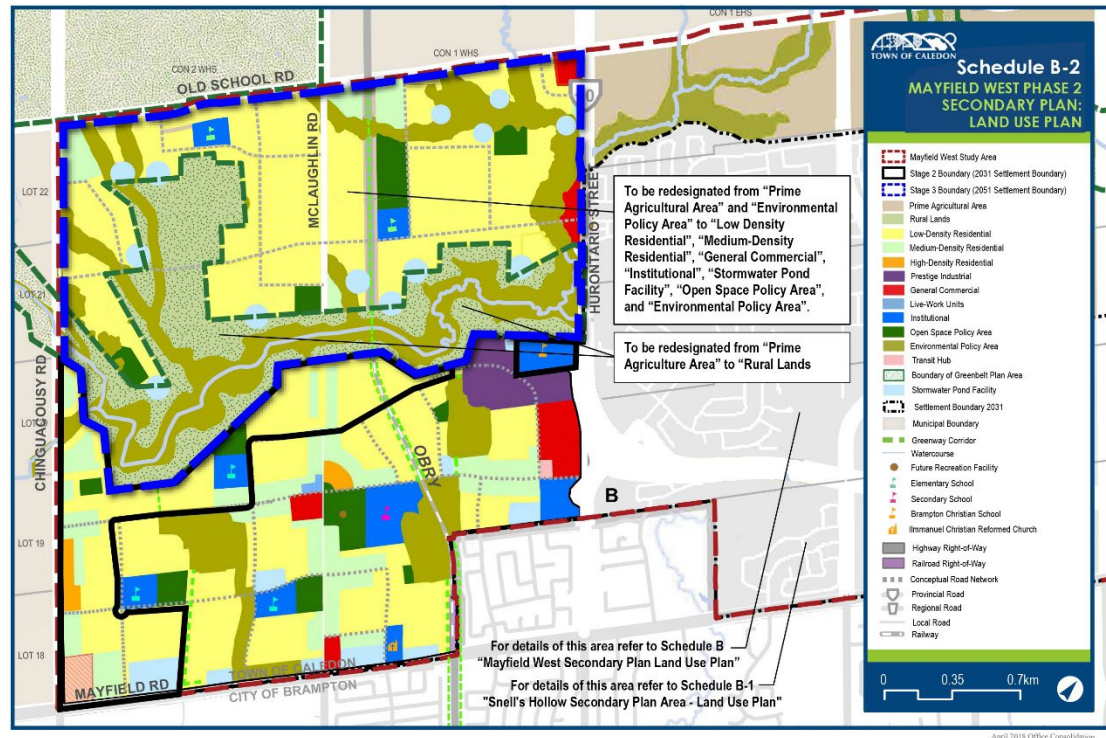
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As such, we request that the Town review the studies undertaken as part of the OPA application and re-designate the lands from “New Community Area” in Schedule F1 – Urban System to “Low Density Residential”, “Medium Density Residential”, “General Commercial”, “Institutional”, “Stormwater Pond Facility”, “Open Space Policy Area”, and “Environmental Policy Area”, as shown in Figure 1 below, to allow for continuity in planning and the logical completion of the Mayfield West Phase 2 community. There has been a sufficient amount of work undertaken for the Mayfield West Phase 2 – Stage 3 lands and as such an additional secondary plan process should not be required.

Moreover, we request that the Town consolidate the three proposed volumes of the Draft FCOP into one comprehensive document, which will include the Mayfield West Phase 2 Secondary Plan policies in the single Draft FCOP document. The Mayfield West Phase 2 Secondary Plan schedule should be subsequently updated and expanded to include the Mayfield West Phase 2 – Stage 3 lands and apply the proposed land use designations as shown on Figure 1.

Figure 1: Proposed Amendment to Schedule B-2



*Note: Refinements have been made to the Proposed OPA to reflect the additional review undertaken since the initial submission of the OPA Application in July 2022*

## 2.0 Minister's Zoning Orders

We would like to request that the schedules of the Draft FCOP include the identification of lands that are subject to approved Minister's Zoning Orders ("MZOs"). Furthermore, the Draft FCOP should include a policy that provides direction for when the policies of the Official Plan and the MZO conflict, the provisions in the MZO should prevail and that the development of the lands that are subject to a MZO will occur within the terms of an agreement between the Town and the landowner, as appropriate.

## 3.0 Transportation

Despite not providing detailed land use designations, the Town has provided a conceptual collector road network for the lands designated as New Community Areas and New Employment Areas on Schedule C1 – Town-wide Transportation Network. Such depiction of the road network should not occur in the absence of detailed land use designations that inform a logical street network. Should the Town continue to illustrate the proposed collector road network on Schedule C1, it should align with the road pattern and configuration delineated in Brookvalley's proposed OPA, as the network was prepared in accordance with the recommendations of the transportation study submitted in support of the OPA application.



It should also be noted that the collector road networks shown on the Brookvalley Lands on Schedule C1 differs from the road network shown on Schedule F1 – Urban System. The road networks, if shown, should also align with each other.

As indicated through the GTA West Corridor consultation process, we request that Route S4-2 be carried forward as the preferred route alternative for Section 4 of the GTA West Corridor, which is included as Attachment A of this letter. We also request that it be modified to straighten the alignment to be north of Old School Road and outside of the Mayfield West Study Area, to avoid limiting the development of the lands at the northwest corner of the Mayfield West Study Area and eliminate the interchange at Chinguacousy Road to provide a more efficient route along the corridor.

#### **4.0 Natural Heritage**

The Draft FCOP currently includes several schedules that identify significant environmental feature limits. With respect to the Natural Heritage System policies, we are supportive of the policies included in the Draft FCOP that permit refinement of the Natural Heritage System without amendment to the Official Plan.

It is our opinion that mapping within New Community Areas should be based on site-specific conditions and mapping, where available, in the new Draft FCOP, as is the case for the Brookvalley Lands.

Through our review, the below schedules should ensure alignment with the work provided through Brookvalley's OPA application (which is included in Attachment B):

- Schedule D1 – Natural Environment System
- Schedule D2 – Natural and Supporting Features and Areas
- Schedule D3 – Water Resources System Areas
- Figure D1 – Greenbelt Plan Natural Heritage System

#### **5.0 Growth Management and Phasing**

It is our understanding that the Town of Caledon is undertaking a Growth Management and Phasing Plan to determine the staging and sequencing of development. Within the Mayfield West Study Area, the Town and landowners have started to realize Phase 2 Stages 1 and 2. As such, we are continuing to request that the completion of the Mayfield West Phase 2 – Stage 3 community and other areas with a similar long-standing planning history and intention to accommodate growth, including the Bolton Residential Expansion Study Lands (ROPA 30), be prioritized in advance of newer expansion areas to allow for continuity in planning and the logical and sequential completion of the community. Additionally, the services constructed for Phase 2 Stages 1 and 2 have been oversized to accommodate for future growth within the Mayfield West Phase 2 – Stage 3 lands and are available for immediate servicing.

#### **6.0 New Provincial Planning Statement, 2023**

Lastly, it is our opinion that the Draft FCOP should be aligned with the new Provincial Planning Statement (2023 PPS). The proposed 2023 PPS intends to consolidate the existing Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe

(the “Growth Plan”). As such, the policies of the Draft FCOP should remove all reference to the Growth Plan, to remain consistent with this new policy direction of the 2023 PPS.

Numerous sections throughout the Draft FCOP directly refer to the Growth Plan as a guiding a document for developing relevant policies and schedules, which should be removed as part of any future Draft or Final FCOP.

We would like to commend staff on their efforts so far and look forward to working with you through the remainder of the Future Caledon Official Plan Review process. If you have any questions or would like to meet to discuss the content of this letter, please do not hesitate to contact me.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

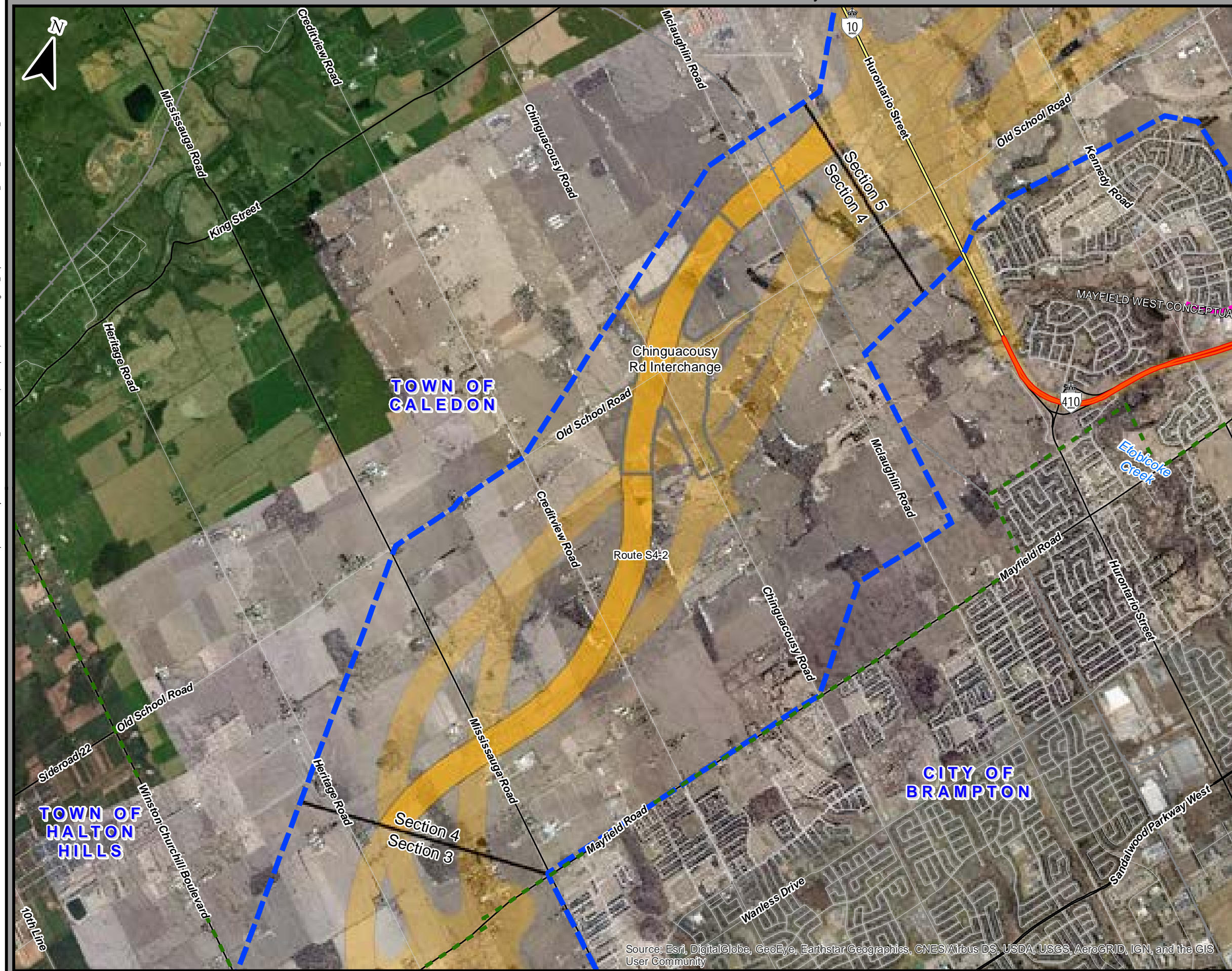
cc: Bailey Loverock, Town of Caledon  
Steve Burke, Town of Caledon  
Frank Filippo, Brookvalley Project Management Inc.  
Nick Cortellucci, Brookvalley Project Management Inc.

Attachments:

Attachment A: Route S4-2, GTA West Corridor

Attachment B: Mayfield West Phase 2 – Stage 3 Significant Environmental Features

2019/08/16  
AECOM \\va1113f5001\prod\Aecom\Projects\60347240\900-CAD\_GIS\920-929 (GIS-Graphics)\920-ENV\Design\01\_Reports\PCMXD\60347240\_GTAW\_Alternatives\_ShortList.mxd



GTA West

Legend

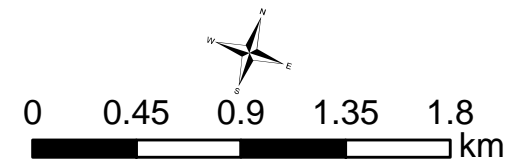
- Railway
- Freeway
- 407 ETR
- Future Highway 427 Extension
- Highway
- Arterial Road
- Local Road
- Section Boundary
- Planned Municipal Improvements
- Municipal Boundary
- Route Planning Study Area
- Featured Route Alternative
- Conceptual Interchange Footprint
- Short List of Route Alternatives

DRAFT

Sources:  
Regional Municipality of York, Regional Municipality of Peel, Regional Municipality of Halton, Township of King, City of Vaughan, Town of Caledon, City of Brampton, City of Mississauga, Town of Halton Hills, Town of Milton  
Contains information licensed under the Open Government Licence - Ontario

Alternative Route S4-2

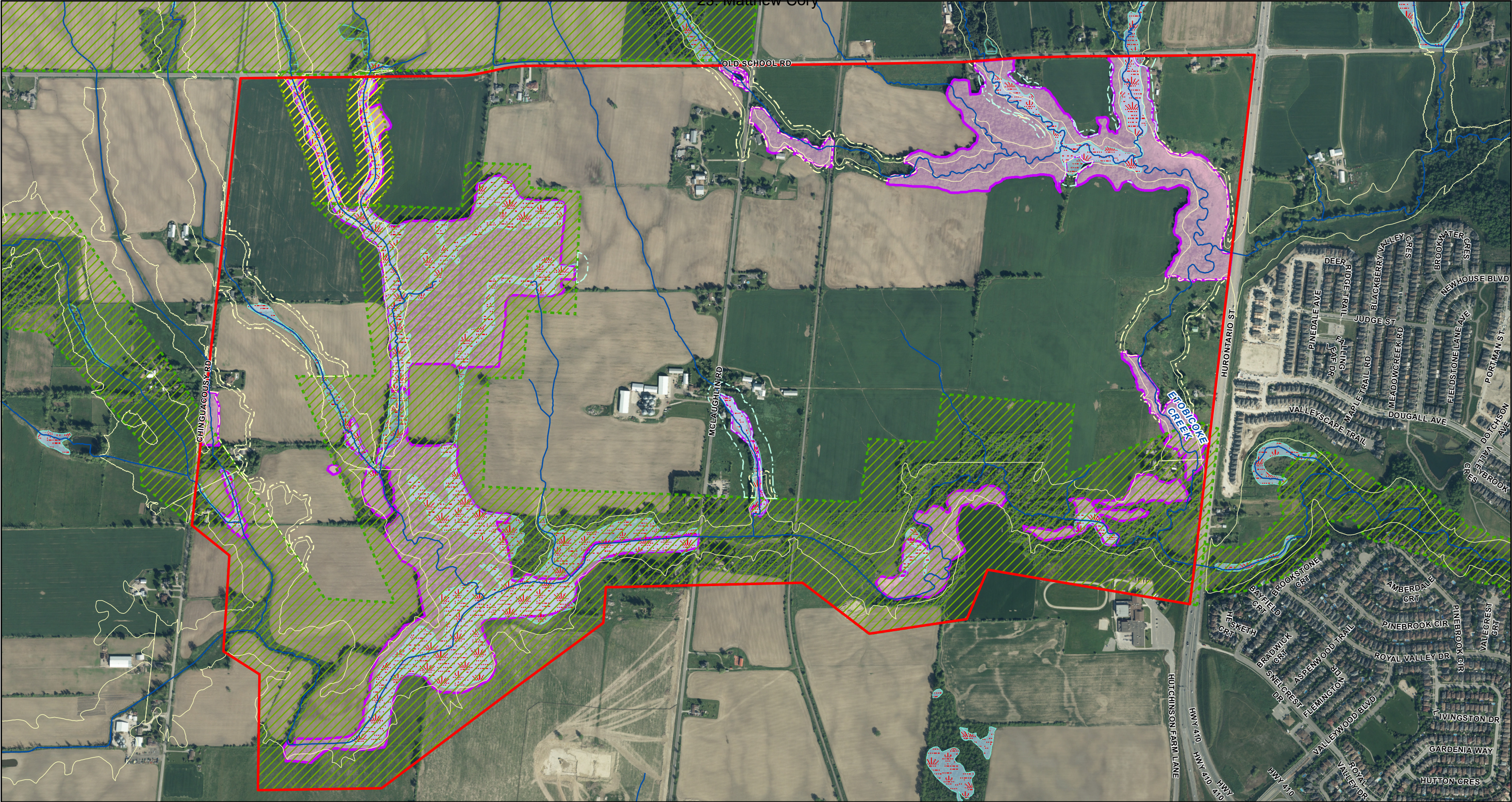
Page 11 of 47  
September 2019



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



23. Matthew Cory



LEGEND

Watercourse <sup>1</sup>

Wetland: Not Evaluated

Wetland: Evaluated-Provincial

Study Area (NHS)

Woodland and Wetland (feature limits to be staked at EIR stage)

Floodplain <sup>4</sup>

Floodplain Setback (10 m)

3 - Toronto and Region Conservation Authority (TRCA)

Provincially Significant Wetland Setback (30 m)

Greenbelt NHS <sup>3</sup>

Growth Plan NHS

Woodland and Wetland Setback (to be confirmed at EIR stage)

**DRAFT**

**Key Map**

0 100 200 300 400

METRE SCALE

North American Datum 1983  
Universal Transverse Mercator Projection Zone 17

Scale: 1:10,000  
Page Size: Tabloid (11 x 17 inches)

Drawn: SM  
Checked: DJ  
Date: Jun 29, 2022

Source Notes: Base imagery (2020) provided by Peel region GIS services.

CLIENT	Brooke Valley Homes
PROJECT	Mayfield West Phase 2
TITLE	Significant Natural Heritage Features
REF. NO.	1701602-4-1
Figure 4 B184	



**General Drafting Issues**

Defined Terms – Uses that are defined in the Draft OP are italicized in the text. However, this is not consistently done. Failure to do so, could lead to unintended interpretations of the policy. The Draft OP should be carefully reviewed to ensure that there is consistency in the reference to defined terms.

Consistent Terminology – Throughout Section 17.4 of the Draft OP different words are used to refer to the same thing. These include terms such as size, area, lot area, lot coverage, covers, floor area, Consistent wording should be used unless it is intended to refer to a different concept.

-----

**Section 17.4.3**

“17.4.3 For the purposes of this Plan, *on-farm diversified uses* will be located on a property that is in active *agricultural use* and used as a farm, are uses that are secondary to the principal *agricultural use* of the property and are limited in area.”

Amendments Required - Section 17.4.3 should be amended to clarify the factors that will be considered to determine whether an OFDU is “secondary” to the principal agricultural use. Relative gross revenues and other factors should be taken into account.

---

**Section 17.4.4**

“17.4.4 *On-farm diversified uses* will be subject to site plan control to address site specific issues and ensure no *adverse effects* on the viability of surrounding uses, to the satisfaction of the Town.”

Amendments Required – The term *adverse effects* is defined in the Draft OP. The words “on the viability” of surrounding uses is confusing. The requirement should be that the OFDU not have *adverse effects* on surrounding uses without requiring an evaluation of the viability of those surrounding uses.

-----

**Section 17.4.5**

“17.4.5 The following uses are considered to be on-farm diversified uses, subject to meeting the criteria set out in section 17.3.5 and conformity with Provincial Plans.”

Amendments Required – The reference to Section 17.3.5 is unclear. Section 17.3.5 deals with new agricultural related uses and refers back to Section 17.4.9 which relates to rezoning of lands to permit larger OFDU. Instead, the criteria in Section 17.4.9, subsection (a) to (k) should be set out in a separate section. That new section should be cross-referenced in Section 17.4.5 and also 17.4.9.

-----



**Section 17.4.7**

“17.4.7 The maximum size of an on-farm diversified use is 4.0 per cent of the lot area and the maximum percentage of the 4.0 per cent lot coverage that can be used for buildings and structures is 35 per cent, up to a maximum of 3,500 square metres. Proposals that exceed this cap may be considered subject to a Zoning By-Law Amendment and without the need for an Official Plan Amendment subject to meeting the criteria in section 17.4.9.”

Amendments Required – The terminology used in Section 17.4.7 to describe areas is vague and inconsistent. Clarity is required.

OFDU Area - It is intended that only 4% of the lot area can be used for the OFDU. However, Section 17.4.7 refers to this “area” variously as size and lot coverage. Section 17.4.8 lists the areas that are included in the calculation of area (size/lot coverage). For clarity, Section 17.4.7 should be amended refer to delete the reference to size and lot coverage and provide a cross reference that the area be calculated in accordance with Section 17.4.8. There should also be a cap on the area that can be used for the OFDU.

Area of Buildings and Structures – Clarification is required regarding the areas that will be included in the calculation of the area of buildings and structures. It should include all building areas at, above and below grade. In addition, it should include all structures including pools and tents used in the OFDU. In addition, the cap on the area of building and structures of 35,000 m<sup>2</sup> (376,737 ft<sup>2</sup>) is too large. By comparison, this significantly larger than most Costco stores.

-----  
**Section 17.4.8**

“17.4.8 The area of an on-farm diversified use includes:

- a) laneways and driveways accessing the on-farm diversified use if not shared with the principal agricultural use of the property;
- b) parking and loading areas devoted solely to the on-farm diversified use if they are designed in such a way to preclude their use for agricultural purposes;
- c) the floor area of all buildings and structures constructed after April 30, 2014 used for the on-farm diversified use (the floor area of buildings and structures constructed prior to April 30, 2014 is not counted to encourage the adaptive re-use of existing buildings); and,
- d) any outdoor storage areas, patio areas and areas used for infrastructure that supports the on-farm diversified use such as stormwater management ponds, fire-fighting ponds and tile fields.

Lands that were previously not used for agriculture that are proposed to be used for an on-farm diversified use will generally not be counted towards the area calculation.”

Amendments Required.

Shared Areas – Section 17.4.8(a) and (b) should be amended to require that shared areas be included in the calculation of the OFDU area. One would only have to leave room for a farm tractor to drive on a parking area to exclude it from the OFDU area calculation. Calculation of area in accordance with these policies would underestimate the actual area used by the OFDU.

Buildings and Structures – Section 17.4.8(c) should be amended to clarify that the floor area includes the total floor area or gross floor area of the buildings at, above and below grade that are used for the OFDU. Commercial event venues use large tents to host events. Section 17.4.8(c) or (d) should be amended to include tents in the floor area calculation.

Non-Agricultural Areas – Section 17.4.8 permits lands that were not previously used for agriculture can be excluded from the calculation of the OFDU area. This would allow any residences and the lawns and gardens surrounding them to be used for an OFDU without being included in the area calculation. Again, this would underestimate the actual area used by the OFDU.

-----  
**Section 17.4.9**

“17.4.9 The implementing Zoning By-law will permit an on-farm diversified use that covers up to 2.0 per cent of the lot area up to one hectare and the maximum percentage of the 2.0 per cent lot coverage that can be used for buildings and structures is 20 per cent, up to a maximum of 1,000 square metres. An application to increase the permitted lot coverage beyond two per cent to a maximum of four per cent will require a re-zoning, where it must be demonstrated that the proposed on-farm diversified use:

- a) will be secondary to the principal *agricultural use* of the property;
- b) will be *compatible* with and will not hinder surrounding agricultural operations;
- c) will be at a scale and intensity of operation that is appropriate for the site and the surrounding area;
- d) will be supported by adequate on-site parking facilities, in addition to the parking required for the principal use on the property, with such parking provided in locations *compatible* with surrounding land uses;
- e) is generally located within the existing farm building cluster where practical and feasible;
- f) does not generate potentially conflicting off-site impacts;
- g) is limited to low water and low effluent producing uses and is on a property that is capable of accommodating the use on private water and private sewage treatment systems;
- h) meets all applicable air emission, noise, water and wastewater standards and receives all relevant environmental approvals;
- i) enhances the agricultural and rural character of the area and promotes where possible the *conservation of built heritage resources and cultural heritage landscapes* and/or the establishment of a built form that is *compatible* with the agricultural and rural surroundings;

23. Matthew Cory  
**Appendix A – Draft OP Section Specific Comments**

- j) is located in such a manner to minimize the amount of land removed from agricultural production, where possible; and,
- k) will meet all applicable *accessibility* requirements for any built development or structures.”

**Amendments Required**

**Uses Permitted by As-of-Right Zoning** – Policies for as-of-right zoning for OFDU should be deleted in their entirety or be amended to exclude those OFDU which have potential to impact surrounding agricultural, rural and rural residential uses, specifically commercial event venues. The Town may also wish to exclude uses related to trucking.

**Minimum lot area** – The requirement in Section 17.4.6 that the lot on which an OFDU is located be a minimum of 4.0 ha (10 acres) has **not** been carried forward to section 17.4.9 regarding the criteria to be included in as-of-right zoning. Section 17.4.9 should be amended to require that the zoning by-law include the 4.0 ha minimum lot area for OFDU.

**Minimum area of lot in active *agricultural use*** – The requirement in Section 17.4.6 that a minimum of 40% of the lot area be in active *agricultural use* not been carried forward to section 17.4.9 regarding the criteria to be included in as-of-right zoning. Section 17.4.9 should be amended to require that the ZBL include the requirement that 40% of the lot be in active *agricultural use*, consistent with section 17.4.6.

**Maximum size/lot coverage of OFDU** – The wording of Section 17.4.9 regarding the maximum area of an OFDU to be included in the zoning by-law is unclear and confusing.

“..... permit an on-farm diversified use that covers up to 2.0 per cent of the lot area up to one hectare...”

- It should be made clear that the maximum (“up to”) means that the maximum area of the OFDU is 2% of the maximum lot area (1 ha (10,000m<sup>2</sup>)) which is 200 m<sup>2</sup> (2,152 ft<sup>2</sup>). If this is the intent, the section should just say that the maximum area of the OFDU is 200 m<sup>2</sup> (2,152 ft<sup>2</sup>).
- If this section was intended to mean that the maximum area of the OFDU is 1 ha (10,000m<sup>2</sup>) (107,640 ft<sup>2</sup>) this is a massive area and is too large to be permitted as-of-right in the zoning by-law.
- The terminology used in Section 17.4.9 to describe area is “cover”. This is vague. In Section 17.4.7 the terms “size” and lot coverage” are used and seem to be interchangeable. Section 17.4.8 refers to “area” of an OFDU. Sections 17.4.7, 17.4.8 and 17.4.9 should all be clarified to make these terms clear and consistent. Section 17.4.9 should be amended to specify the parts of the OFDU that area included in the calculation of area and be consistent with Section 17.4.7 (with the proposed amendments).

**Buildings and Structures** - The wording of Section 17.4.9 regarding the maximum area of buildings and structures in an OFDU by as-of-right zoning is unclear and confusing.

- Section 17.4.9 should be amended to clarify the areas of buildings and structures at, above and below grade in a building must be included in the calculation.

23. Matthew Cory  
**Appendix A – Draft OP Section Specific Comments**

- The maximum as-of-right area for OFDU building and structures is too large 1,000 m<sup>2</sup> (10,764 ft<sup>2</sup>) and should be reduced. The maximum of 1,000 m<sup>2</sup> does not seem to come into play unless the lot is greater than 25 ha (62 acres)

Increase in Maximum Area without an OPA - Section 17.4.9 permits applications for rezoning to increase the permitted “lot coverage” from 2% to a maximum of 4% without an amendment to the OP provided that the listed criteria are met. The area calculation should be consistent with section 17.4.8. The terminology should be clear and consistent.

Criteria to Increase the size of a OFDU

- The criteria in Section 17.4.9, subsection (a) to (k) should be set out in a separate section.
  - In subsection (a) further clarification should be provided regarding the factors that will be considered in evaluating whether an OFDU is secondary to the principal agricultural use.
  - A new criteria should be that the OFDU does not have any adverse effects on surrounding uses. This reflects the policies in Section 17.4.4.
  - In addition, OFDU should be required to be compatible with uses in the surrounding agricultural and rural areas.
- 

**Section 17.4.10**

“17.4.10 Factors to consider in determining whether a proposed on-farm diversified use meets the criteria set out in section 17.4.9 include:

- a) the nature of the on-farm diversified use and the potential impacts of the use on adjacent land uses and the character of the area; and,
- b) the amount of traffic generated by the on-farm diversified use in relation to the principal use on the property.”

Amendments Required – These 2 criteria seem to only apply to an application to permit an OFDU beyond the size permitted as-of-right in the zoning by-law. These criteria should apply to any OFDU before it is permitted.

-----

**Section 17.4.11**

Cessation of the Agricultural Use

Section 17.4.11 provides that the OFDU is secondary to the agricultural use. If the agricultural uses ceases then the OFDU must cease.

“17.4.11 *On-farm diversified uses* are required to be secondary to a farm. Where a farm ceases to operate, any permitted on-farm diversified use is required to cease operations.”

Amendments Required

- Section 17.4.11 uses the terms “farm” which is not used elsewhere in regard to OFDU. To be consistent the reference to “farm” should be changed to “*agricultural use*”.
- In order to assist in the enforcement of this requirement, Section 17.4.11 should be amended to provide that the site plan agreement will contain an acknowledgement of this requirement from the land owner.

30. Mary Bull  
*Mary Bull*  
16486 St. Andrew's Road  
Caledon East, ON L7C 2R9

19 September 2023

Planning Department  
Town of Caledon  
6311 Old Church Road  
Caledon East, ON L7C 1J6

[opreview@caledon.ca](mailto:opreview@caledon.ca)

**Re: On-Farm Diversified Uses / Commercial Event Venues  
Town of Caledon Official Plan Review**

I am a resident of the Town of Caledon and part of the Caledon East Rural Neighbours group. Along with my neighbours I have significant concerns regarding the number of On-Farm Diversified Uses ("OFDU") that have started operating in the rural areas of the Town in recent years. Of particular concern are the commercial event venues that are now operating on rural properties under the guise of OFDU. Many of these are operating illegally and without municipal and/or Niagara Escarpment Commission ("NEC") approval. They have an impact on their neighbours in terms of excessive noise at all hours and traffic. They have also caused impacts to neighbouring agricultural operations and the natural environment. These commercial event venues continue to operate even after being advised that they are in contravention of the Town's by-laws. Enforcement has become a large and costly issue for the Town.

With these issues in mind, I have reviewed the policies of the New Official Plan (Draft August 2023) (the "Draft OP") in regard to OFDU, particularly commercial event venues. The policies of the Draft OP would permit OFDU to establish in the Town without sufficient oversight regarding their potential impacts on agriculture, the natural environment and surrounding rural uses. The approach to OFDU needs to be revisited before the Draft OP is next presented to Council for consideration and adoption.

Key concerns with the policies in the Draft OP are set out below. Drafting issues and suggested amendments to specific policies are detailed in Appendix A attached to this letter.

Prohibit As of Right Zoning for Commercial Event Venues

The existing Official Plan ("Existing OP"), Section 5.1.1.8.8a, provides that commercial event venues are only permitted by an amendment to the zoning by-law. Requiring a rezoning for commercial event venue permits Town Council and staff to consider the specifics every proposed commercial event venue and whether it meets the policies of the Existing OP. For instance, Town Council and staff can determine whether it is a bona fide OFDU or whether it would result in adverse effects on surrounding properties.

The requirement for a site specific rezoning for commercial event venues has not been carried forward in the Draft OP. Instead, the Draft OP proposes that the zoning by-law be amended to



30. Mary Bull  
*Mary Bull*  
**16486 St. Andrew's Road**  
**Caledon East, ON L7C 2R9**

permit all OFDU, including commercial event venues, of a certain size as-of-right (Section 17.4.9). For example, the draft policy would permit a commercial event venue on a 25 ha (62 acre) lot to have an area of 5,000 m<sup>2</sup> (54,014 ft<sup>2</sup>) and buildings and structures to be 1,000 m<sup>2</sup> (10,700 ft<sup>2</sup>). These sizes are significant. Commercial event venues of this size can cause significant adverse effects on the rural area.

At a minimum, the Draft OP should be amended to exclude commercial event venues from the policies of Section 17.4.9 regarding as-of-right zoning, consistent with the approach in the Existing OP.

Secondary Use

The definition of OFDU, policy 17.4.3 and 17.4.9(a) of the Draft OP require that OFDU be secondary to the principal agricultural use of the property and be limited in area. Although the Draft OP includes policies regarding the permitted size of OFDU, it provides no direction as to the factors that are to be considered in evaluating whether an OFDU is secondary. Without any clarification commercial uses which are independent of an active agricultural use will be able to establish in the Town, contrary to the intent of the Draft OP.

The factors that should be considered in considering whether an OFDU is secondary to the principal agricultural should include taking in to account gross revenues and other relevant factors. The Draft OP should be amended accordingly.

Calculation of the Area of the OFDU

The Draft Official Plan, Section 17.4.8, lists the areas of the OFDU that will be included in the calculation of the OFDU. Calculation of area in accordance with these policies would underestimate the actual area used by the OFDU. Lands that were not previously used for agriculture can be excluded from the calculation of the OFDU area. Therefore, a farm house and the lawn and garden areas surrounding it can be used for an OFDU without being included in the area calculation. In addition, areas of the OFDU that can also be used by the agricultural use such as driveways and parking areas are excluded from the OFDU area calculation. The Draft OP should be amended to remove these loopholes.

Request

OFDU, particularly commercial event venues, have become a real issue for the Town and its residents. As noted in this letter and Appendix A, the policies of the Draft OP should be amended in order to ensure that only legitimate OFDU which do not impact the natural environment, surrounding agricultural, rural and rural residential uses are permitted.

30. Mary Bull  
*Mary Bull*  
**16486 St. Andrew's Road**  
**Caledon East, ON L7C 2R9**

I would be pleased to meet with you to discuss these issues in more detail. I can be contacted at the email below.



Regards, Mary Bull

[REDACTED]

- c. Mayor Annette Groves
- Councillor Lynn Kiernan, Ward 1
- Regional Councillor Christina Early, Wards 1, 2, 3
- Regional Councillor Councillor Doug Maskell, Ward 3
- Councillor Dave Sheen, Ward 2
- Councillor Nick de Boer, Ward 4
- Councillor Tony Rosa, Ward 5
- Councillor Cosimo Napoli, Ward 6
- Regional Councillor Mario Russo, Wards, 4, 5, 6

# Bolton North Hill Land Owners Group: Future Caledon Official Plan

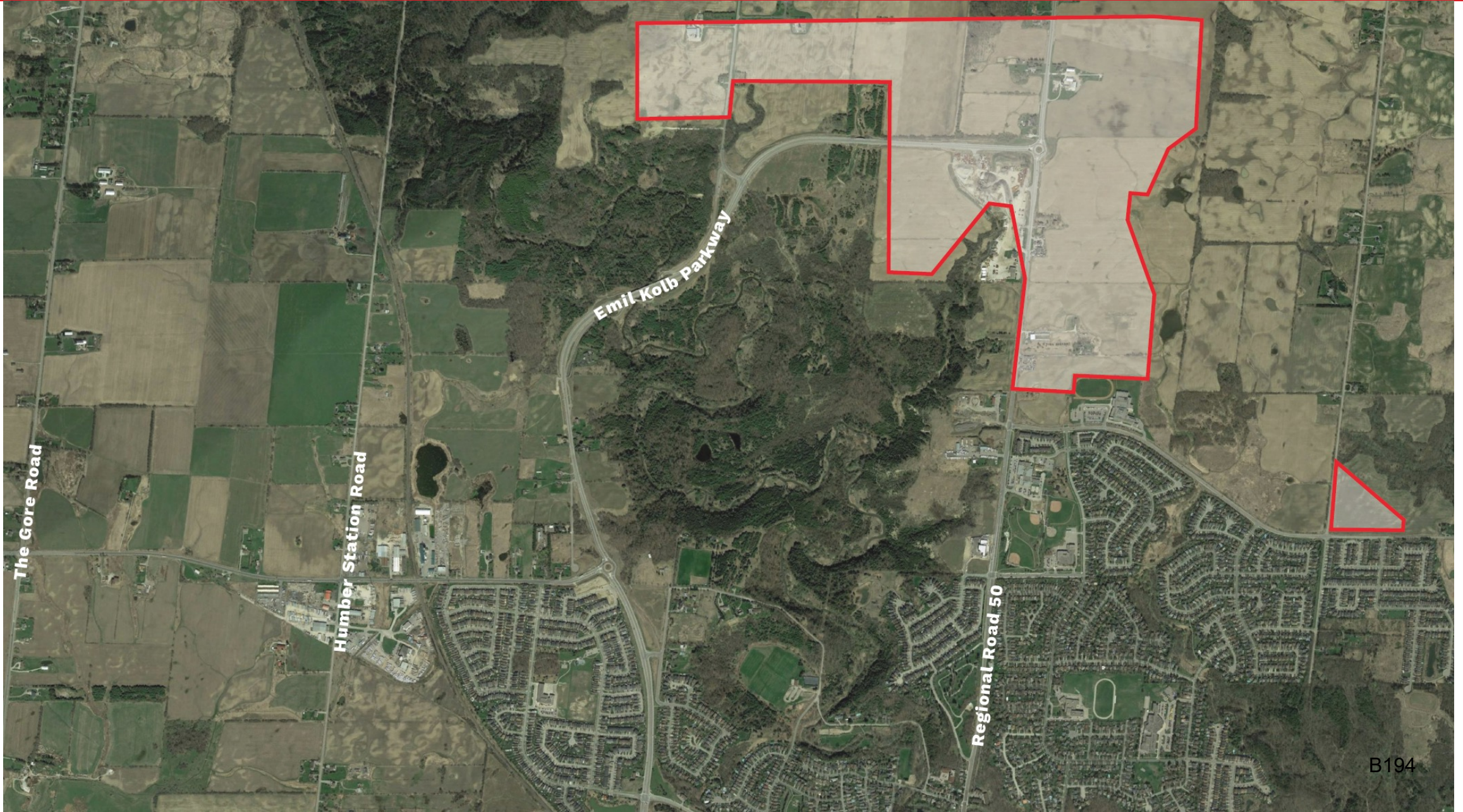
Caledon Planning & Development  
Committee

September 19, 2023



# BNHLG - Subject Lands

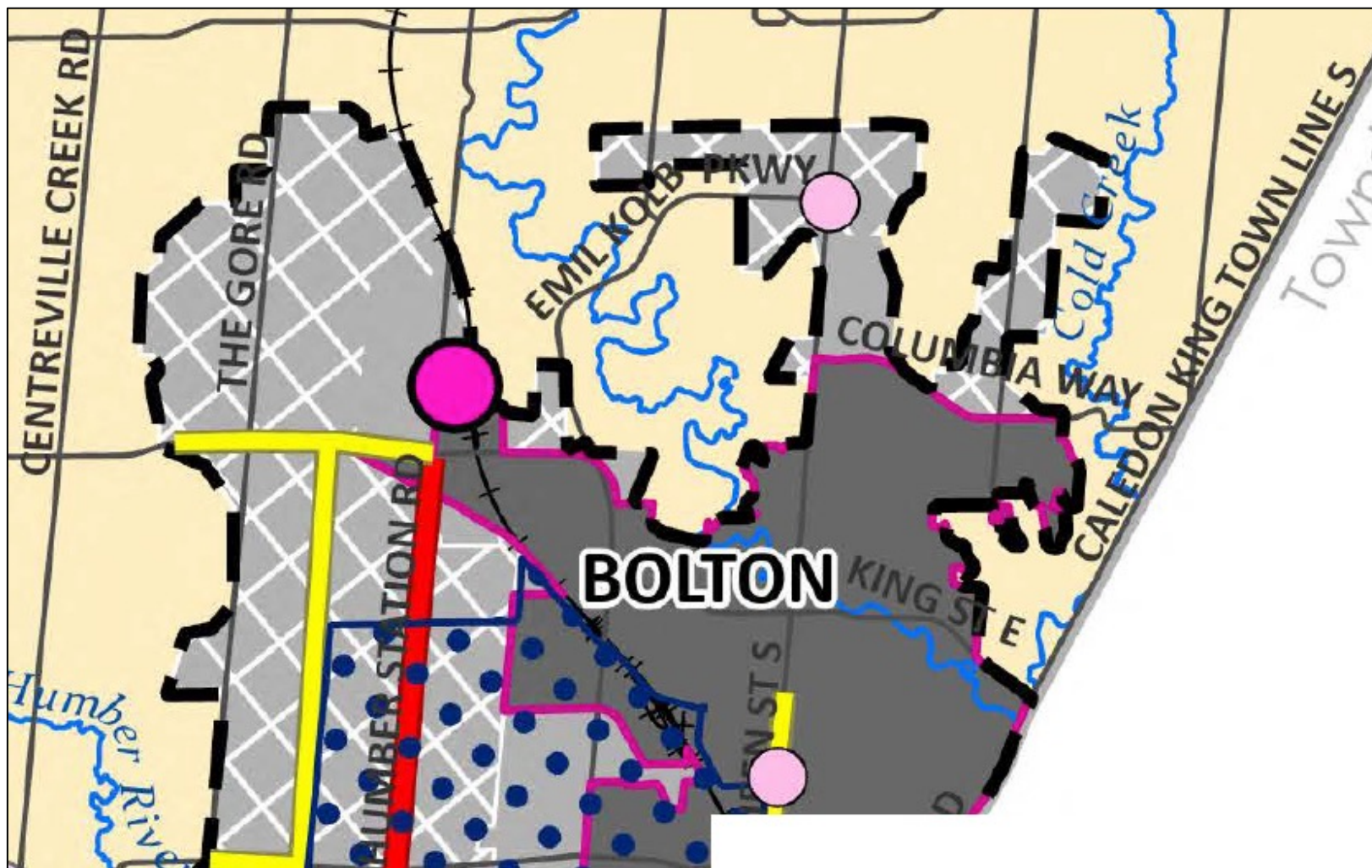
31. Mike Bissett





# Future Caledon OP: Schedule B2 – Growth Management

31. Mike Bissett



Schedule B2: Growth Management



# Future Caledon OP: Figure D4c Preliminary Natural Heritage System

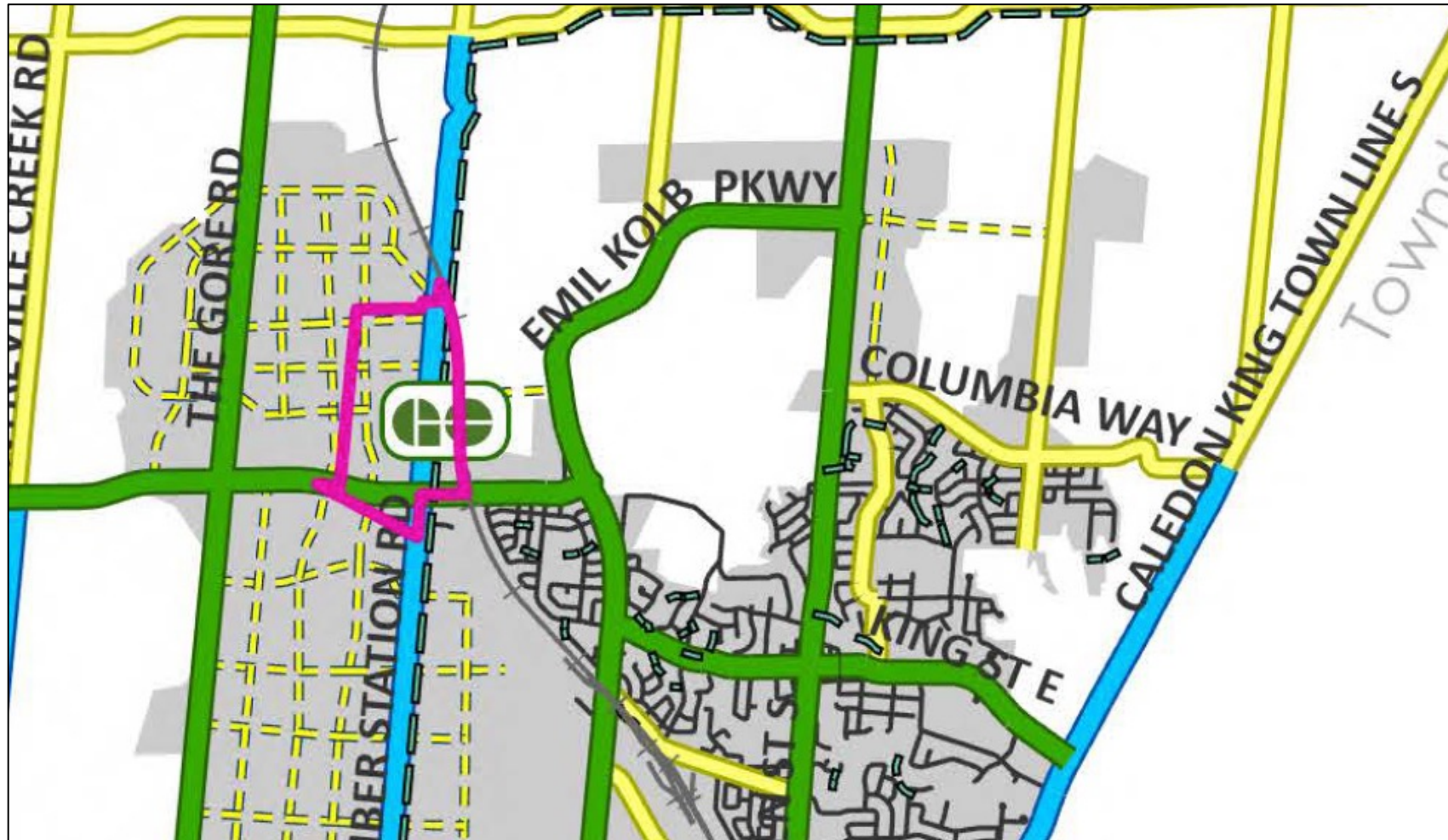
31. Mike Bissett



Figure D4c: Preliminary Natural Heritage System for the Region of Peel Settlement Area Boundary Expansion

# Future Caledon OP: Schedule C1 – Transportation Network

31. Mike Bissett



Schedule C: Town Wide Transportation Network



A photograph of a town street with cars parked along the side and buildings in the background. The text "Thank you!" is overlaid in the center.

# Thank you!



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

July 13, 2023

Bailey Loverock  
Team Lead, Official Plan Review  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Dear Bailey:

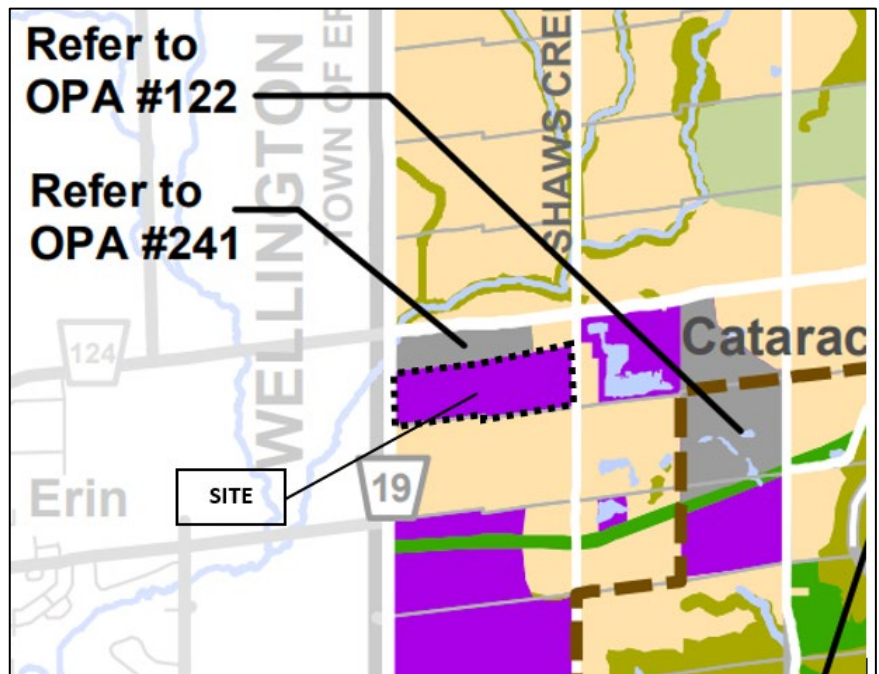
**RE: 2772747 ONTARIO INC. Comments on Town of Caledon Revised Draft Official Plan**

On behalf of our client, 2772747 ONTARIO INC., we are providing the following comments on the Town's Revised Draft Official Plan specifically regarding Schedule B4 Land Use Designations.

Our client owns lands located at Part of Lot 15, Concession 6 WHS, Caledon Township. These lands have been designated Extractive Industrial in the Official Plan dating back to the 1970s including the Town's first Official Plan approved in 1982.

These lands are subject to Section 5.11.2.2.1 of the Official Plan which states the following (emphasis added):

*Notwithstanding the above Section, any property designated Extractive Industrial Area at the time of the adoption of these policies will retain that designation despite there not being an existing extractive operation on those properties. The Extractive Industrial Area designation does not distinguish between above and below water table extraction. In addition, notwithstanding Section 5.11.2.2.5, these properties may be developed for aggregate extraction purposes in accordance with Section 5.7.3.6 and Section 5.11.2.4.7 of this Plan [emphasis added].*



*Existing Official Plan (Extractive Industrial)*



The lands were designated Extractive Industrial at the time of adoption of the OPA 161 policies and are to retain that designation based on the Town's Official Plan.

Based on a review of Schedule B4, the Extractive Industrial designation has been removed from the lands. It appears this has occurred in other locations in the Town. It is our understanding this is likely a mapping error given the Town and Region are currently undertaking an aggregate policy review with draft policies and mapping to be introduced through a separate amendment process. Our understanding is that Revised Draft Official Plan is not intended to revise the aggregate land use designations or related mapping.

We therefore request that the Town update Schedule B4 to correctly identify the lands within the Extractive Industrial designation as per the existing Official Plan and the direction provided in Section 5.11.2.2.1 of the Official Plan.

Thank you for the opportunity to submit comments. Please let us know if you have any questions or would like to discuss our comments.

By way of this letter, please keep us notified of any future meetings or decisions regarding the Town's New Official Plan.

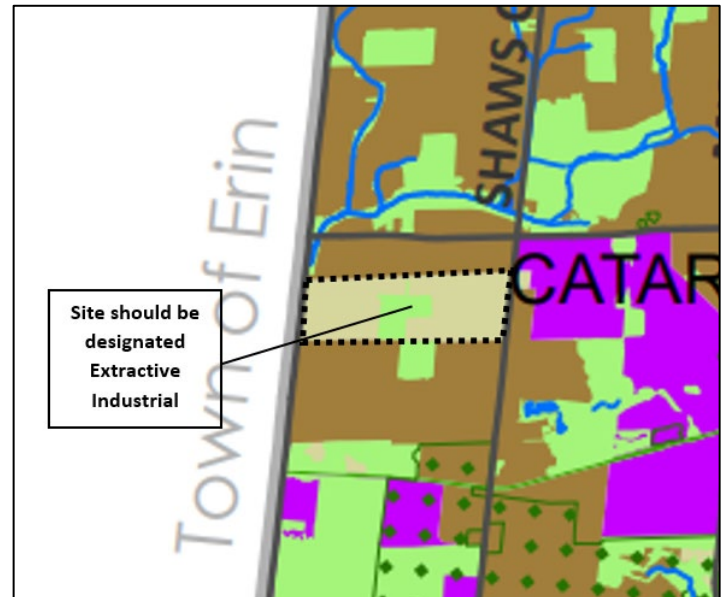
Yours truly,

**MHBC**



Neal DeRuyter, BES, MCIP, RPP

cc. *Steve Burke, Town of Caledon*  
*2772747 ONTARIO INC.*



*Schedule B4, Revised Draft Official Plan*



Submission: Patricia Franks: Caledon Housing Initiative / CAFFI

[cafficaledon@gmail.com](mailto:cafficaledon@gmail.com) [REDACTED]

CAFFI and the families it represents would like to congratulate and acknowledge the positive contributions made by Town staff in this document. There is a true recognition of population diversity, and people with differing abilities are no longer hidden. The language is inclusive and positive, specifically referring to people with “*additional needs*”. There is forward thinking planning as many individuals in Caledon on ODSP, fixed incomes, homeless, and our elderly are facing housing challenges. Creating complete communities, diverse communities, inclusive communities are all vital to the future of this municipality as it grows.

**Due to the dissolution of the Region of Peel in 2025 and the Town of Caledon becoming a single tier municipality, there are some concerns for consideration by Council.**

*Part 1: 1. Future of Caledon Official Plan: “Responsible urban growth management”  
“Equity and inclusion for all”*

*1.1.1b) “coordinate land use and infrastructure requirements to ensure that forecasted growth can be accommodated responsibly.”*

**Concern: How will affordable housing, especially in the more urban centers (Bolton, Caledon East, Mayfield West) be built, supported and subsidized? Will the Province give Caledon the financial resources to achieve this?**

*1.3.2. Part C: Town Wide Policies: housing, public service facilities*

**Concern: Statistics Canada 2017 identified that 22% of the Canadian population have a developmental disability. Ontario has the largest percentage in the country. It is important that Caledon include in its planning for HOUSING, RECREATION, VOLUNTEERISM, and EMPLOYMENT, the existence of people with differing abilities, their families, caregivers and the essential needs for real inclusive community building.**

If we look at just the bottom 5% with the greatest challenges:

Current population: 80,000 residents (2021): 5% with additional needs: 4000 individuals

Projected population: 300,000 residents (2051): 5% with additional needs: 15,000 individuals

*Part 2: Vision, Guiding Principles and Policy Directions.*

*2.3.8: (Part C): “create healthy and complete communities”*

*2.3.11: (Part F): "Housing Affordability and Choice (Chapter 9)*

*Section 4.4: 4.4.3 (1): "support the achievement of complete communities"*

*Section 9: "Housing"*

*9.1 a) "people with additional needs"*

*9.4: "Rental Housing Supply"*

*9.8: "Affordable and Attainable Housing"*

*9.8.1: "Affordable 30% of household income"*

Again, CAFFI acknowledges the positive contributions made by Town staff in recognizing our community diversity, and people with differing abilities. This language did not exist in previous policy document.

**Concerns:**

- 1. Language is so important to define. CAFFI would like to ensure the meanings of terms like ACCESSIBILITY, INCLUSION, COMPLETE COMMUNITIES, AFFORDABILITY, ADDITIONAL NEEDS, INCLUSIONARY ZONING, clearly represent the realities of those the terms are meant to include.**
- 2. When building "*complete communities*", does this mean real mixed housing including affordable rental, subsidized housing units, smaller units for the ability to downsize, housing for aging in place, and housing opportunities for people with differing abilities?**
- 3. Rental units that qualify for rent subsidies and supports need to be created and protected for a sustainable tenancy for our most vulnerable populations, including people with differing abilities.**
- 4. Will the Town, through Council direction, work with CAFFI and the Caledon Housing Initiative on these important concerns?**

*Transportation: 11.5.6 (use of language) refers to "people with disabilities".*

**In keeping with the rest of the documentation, this language should be reviewed so all people with physical and intellectual challenges, differing abilities, and those with medical needs fall under this category.**

CAFFI appreciates the time to speak on behalf of the people it represents. We hope to continue a positive and mutually respectful relationship with the Town and Council as Caledon grows. This should always be a two-way conversation. Thank you for this opportunity.

September 27, 2023

delivered electronically ONLY

## Town of Caledon

Town Hall  
6311 Old Church Road  
Caledon, On  
L7C 1J6

Attn:

**Ms. Antonietta Minichillo** [Antonietta.Minichillo@caledon.ca](mailto:Antonietta.Minichillo@caledon.ca)  
Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>0 Humber Station Road – Caledon, On</b>
Property Ownership:	HS72 CTB INC - 2 Adjoining Properties
Property Identification Number (PIN)	14326-0071 + 14326-0072
Est. Total Lot Area:	41.3 acres

Respected Officials:

We submit this letter to the Town of Caledon in response to the Town's communication received July, 2023. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

Our firm represents all Planning, Urban Design, and development applications related to the above noted address. In addition, RGC has been contacted by other landowners within the area of our clients' lands for information and inclusion and professional representation on their behalf.

We respectfully recognize that the subject lands fall within the pending Secondary Plan Study area for Growth Management under the new Caledon Official Plan. We refer the Town to the RGC context map identifying the subject site. It is our client's intent to ensure that the subject lands be included within the study area, and by way of our office, we aim to work with Town officials in a timely manner. RGC is prepared to work and consult with civic officials in order to ensure the conceptual design of the Policy 5 area is manageable, buildable and achievable for the future success of this new community.

In conclusion, we hope that the Town will continue to communicate with all vested stakeholders directly.

We respectfully await *the Town's "NEXT STEPS"* approach and plan for implementation.

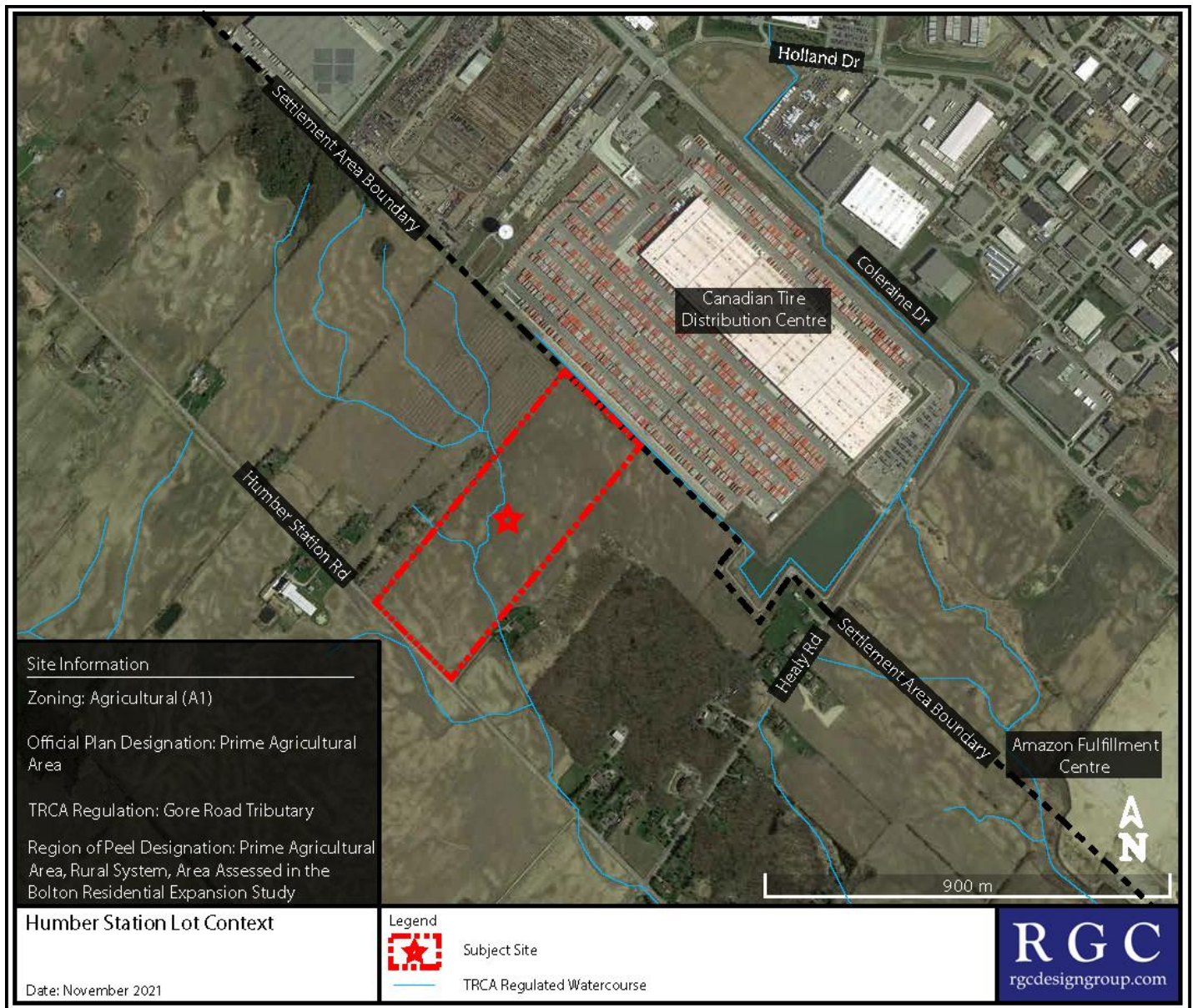
In the meantime, and mindful of time, kindly contact us at your convenience to continue this important discussion and acknowledge receipt of this letter.

Respectfully submitted,

**RG CONSULTING INC.**

**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, CAHP  
Principal

cc. J. Bhatti





### 38. Harman Swaich

Mayor Grooves and members of council, I am a resident of the Town of Caledon and am part of the Caledon East Rural Neighbors group.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property.

The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centers of a certain size. The size of the outbuildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event center while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centers in a 4 km radius. These centers avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit.

Further, these centers are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Milcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income that is to neighboring farms and community friendly. What has happened with trucking yards is not. What is happening with the event centres now is not.

*Regards;*

*Harman Swaich Bsc. E. Eng.*

### 39. Kevin Nunn

Good Afternoon, Steven, Bailey, and the OP Review Team,

Please regard this e-mail as a formal comment on the Town's most recent version of the Official Plan review Process prior to the commenting deadline of October 2<sup>nd</sup>, 2023.

Weston Consulting is acting on behalf of the owner of 4 Walker Road, Caledon in the Village of Caledon East. Weston had achieved an Official Plan Amendment (attached) for the lands and Weston is reviewing these Draft Official Plan policies for the potential for increased intensification on the above noted lands beyond our approvals and what is being proposed by the Town. A letter in this regard is forthcoming.

If you could kindly provide confirmation of receipt of this comment and provide updated timelines for the OP Review process that would be helpful. Should staff want to meet to discuss the nature of our comment, Weston would be happy to meet in that regard.

Thank you and have a great day.

**KEVIN NUNN**

**AMENDMENT NO. 262**  
**TO THE OFFICIAL PLAN FOR**  
**THE TOWN OF CALEDON PLANNING AREA**

**THE CORPORATION OF THE TOWN OF CALEDON**


**BY-LAW NO. 2021-18**

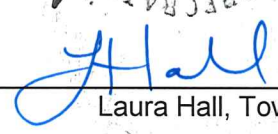
A by-law to adopt Amendment No. 262 to the  
Official Plan for the Town of Caledon

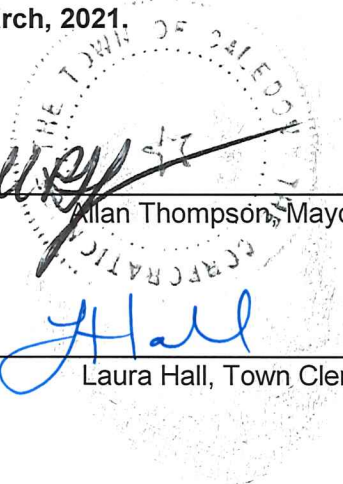
WHEREAS the Council of the Corporation of the Town of Caledon, in accordance with the provisions of the *Planning Act*, R.S.O. 1990, as amended, HEREBY ENACTS AS FOLLOWS:

1. Amendment No. 262 to the Official Plan for the Town of Caledon Planning Area shall be and is hereby adopted.

Enacted by the Town of Caledon Council this 30th day of March, 2021.

  
\_\_\_\_\_  
Allan Thompson, Mayor

  
\_\_\_\_\_  
Laura Hall, Town Clerk





**THE CONSTITUTIONAL STATEMENT**

PART A - THE PREAMBLE - does not constitute part of this amendment.

PART B - THE AMENDMENT - consisting of the following text constitutes Amendment No. 262 of the Town of Caledon Official Plan.

**AMENDMENT NO. 262**  
**OF THE TOWN OF CALEDON OFFICIAL PLAN**

**PART A - THE PREAMBLE**

**Purpose of the Amendment:**

The purpose of this Amendment is to amend Schedule "D" Caledon East Land Use Plan of the Town of Caledon Official Plan by establishing a site specific permission for an increase in the permitted density within the Low Density Residential designation to permit the creation of two residential lots.

**Location:**

The lands subject to this Amendment comprise an area of 0.1 ha (0.24 ac). The property is lands legally described as Part of Lot 4, Concession 6 EHS (Caledon); Town of Caledon; Regional Municipality of Peel, and municipally known as 4 Walker Road West in Caledon East.

**Basis:**

The basis for this Amendment is contained in Staff Report 2021-0057, as adopted by Planning and Development Committee on March 23, 2021 and ratified by Council on March 30, 2021. The applicant, Weston Consulting on behalf of Enio D'Amato, has requested an amendment to the Town of Caledon Official Plan to establish a site specific increase in the maximum net density permitted in the Low Density Residential designation to facilitate the creation of two residential lots.

The lands subject to the proposed subdivision are located within the settlement boundary of the Rural Service Centre of Caledon East and are designated Low Density Residential on Schedule 'D' Caledon East Land Use Plan within the Town of Caledon Official Plan.

The applicant has submitted Official Plan Amendment, Zoning By-law Amendment and Site Plan applications, including various technical studies in support of the proposed applications. The Official Plan Amendment proposes to establish a site specific increase in the maximum net density permitted in the Low Density Residential designation to facilitate the creation of two residential lots. The applications have been circulated to internal departments and external agencies and a public meeting pursuant to the *Planning Act* was held on November 19, 2019. Planning staff has reviewed this application and is of the opinion that the proposed amendment is consistent with the Provincial Policy Statement and conforms to the policies of the A Place to Grow Plan, Region of Peel Official Plan and Town of Caledon Official Plan.

## **PART B - THE AMENDMENT**

This part of the document, entitled "Part B - The Amendment", and consisting of the following text constitutes Amendment No. 262 of the Town of Caledon Official Plan.

### **Details of the Amendment**

The Town of Caledon Official Plan is amended as follows:

1. Section 7.7.5.2 is amended by adding the following subsection 7.7.5.2.12:

7.7.5.2.12: Notwithstanding Section 7.7.5.2.2 of the Plan, a maximum net density of 20.13 units per hectare shall be permitted on the lands municipally known as 4 Walker Road West, Caledon East.

### **Implementation and Interpretation**

The implementation and interpretation of this Amendment shall be in accordance with the policies of the Town of Caledon Official Plan.

Steve Burke,  
Manager Strategic Policy Planning

September 28, 2023

Bailey Loverock, Team Lead, OP Review  
Town of Caledon  
6311 Old Church Road  
Caledon East, ON  
L7C 1J6

**RE: Town of Caledon Official Plan Review – Comments Response  
Properties of McColl Drive  
Town of Caledon (Village of Inglewood)**

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Weston Consulting has been retained by the property owners of 2 and 10 McColl Drive (the 'landowners') in the Village of Inglewood, to provide this Planning Opinion Letter on the viability of achieving lot severances for the properties along McColl Drive. Although [redacted] owners of 2 and 10 McColl Drive, Weston has taken a comprehensive review of all of [redacted] McColl Drive as a part of this letter. Furthermore, when referring to the 'subject properties' [redacted] we are herein referring to all of 2, 6, 10, 16, 20, 24, 28, 25, 17, 11, 5, and 1 McColl Drive unless otherwise specified.

This letter is intended to be read as an update to the previously submitted correspondence (March 2023) which suggested revisions to the draft Official Plan, specifically Section 7.6.5.2 of the currently in-effect Official Plan which limits lots sizes in the Special Policy Area of the Inglewood Village to *average of 1.0 hectares*. The landowners of McColl Drive seek to revise this policy to allow for reduced lots of 0.5 hectare. It is understood that revisions to Secondary Plans are not contemplated at this time through this Official Plan review and are scheduled for a future review, however we believe this request can be accommodated at this time. The potential lot creations along on McColl Drive are an efficient way to modestly increase housing stock while protecting community character.

## **DRAFT CALEDON OFFICIAL PLAN**

The draft Official Plan, as it relates to the Inglewood Village Secondary Plan, generally remains unchanged as updates to the Secondary Plan are deferred to a future review to be incorporated into the new Official Plan. The subject lands continue to be identified within a *Special Residential Area* with the exception that the lands along McColl Drive are now shown within the Settlement Boundary and the Minor Urban Centre. The landowners seek to modify policies as it relates to minimum lot area, as mentioned above.

Based on the current OP review process, the Town is currently undertaking public consultation sessions which will continue throughout 2023 and provide further updates will be based on comments received, ongoing analysis and any Provincial policy changes. We ask that this Letter be considered in the Town's preparation of the final draft Future Caledon Official Plan recommended for Council adoption in December 2023 and not to defer to beyond 2024 timelines. We are not requesting a comprehensive review of the Secondary Plan at this time, but do seek a minor revision to allow for the logical and orderly development of underutilized lands that will have minimal impact on the Secondary Plan Area. The following planning analysis support the proposed reduction in lot size.

## **CALEDON OFFICIAL PLAN AND INGLEWOOD VILLAGE SECONDARY PLAN**

The current Town of Caledon Official Plan identifies the subject properties as *Special Residential* within the Inglewood Village Secondary Plan area (the 'secondary plan') found within Section 7.6 of the OP. Regarding lot



creation, Section 7.10.6.1 of the in-effect Official Plan states that a lot may be created only if there is enough net developable area on both the severed lot and the retained lot to accommodate proposed uses, buildings and structures, including any accessory uses without encroachment on Key Natural Heritage Features or Hydrologically Sensitive Features. These considerations have been assessed and illustrated on the provided Consent Viability Sketch (Figure 1). This sketch identifies viable lots for additional lot creation highlighted in orange with potential severance lines designed (in draft form) that meet the general lot creation policies of this Official Plan.



Figure 1. Consent Viability Sketch

The following sections identify specific rationales in support of the requested minor change to the draft Official Plan to support the proposed severance, described further in Appendix 1.

**Lot Sizing Specifications:** Section 7.6.5.2 of the in-effect provides policies for *Special Residential Areas* of the Inglewood Village Secondary Plan. It states that the *Special Residential Areas* designated on Schedule M of the current shall have an average lot size of 1.0 hectares and individual lots shall have access from internal roads only. The Landowners of McColl Road seek to modify this policy restricting lot size to 0.5 ha.

**Villages in Caledon:** Section 18.1 of the draft OP notes promotes the efficient use of existing infrastructure and public services. Section 18.2 discourages the need for unjustified expansion of infrastructure and water/ waste water services. As noted in Figure 1 above, the proposed reduction of lots to 0.5 ha would result in the creation of an additional 9 residential lots.

**Recent Inclusion within the Minor Urban Centre (NEP):** Inglewood Village Secondary Plan policy 7.6.5.2.3 notes that through a future policy review, the Town may request the Niagara Escarpment Commission (NEC) to amend the Inglewood Minor Urban Centre boundary to include the McColl Drive subdivision, if determined to be appropriate. This has been determined appropriate and the subject properties are now part of the Village in the Minor Urban Centre of the NEP. Given the subject properties inclusion within the *Minor Urban Centre* as shown on the draft Official Plan Schedule B3- Provincial Plan Areas and Designations, new lot sizes should be considered now that the land have been included in the Town's Urban Area and Settlements Area (draft OP Schedule A1). Further, the lot size permission of both the neighbouring residential communities directly to the south on North Riverdale Drive and to directly to the West in *New Residential Neighbourhood A* have minimum lot specifications of 0.44 ha. 0.48 ha. Respectively which are closer aligned with what is being sought. We believe the unique character of the McColl Drive will continue be distinct even with reduced lot areas of 0.5 ha.

## SUMMARY & CONCLUSION

Based on the above as well as the Planning Letter provided March 2023, it is our opinion that the contemplated revision to the draft Official Plan as a part of this phase of the OP Review process represents good planning. The potential severances on McColl Drive is an efficient use of land and an adjustment to the Inglewood Village Secondary Plan Policy 7.6.5.2.1 pertaining to lot sizes for *Special Residential Areas* should be revised as a part of the current iteration of Official Plan Policy Review to read an "average of 0.50 hectares".

We also conclude the following:

- Collectively and individually, the Provincial Policy Statement and A Place to Grow, promote efficient development and land use patterns such as the proposed severances for its contribution to supporting a range and mix of housing options, and minimizing land consumption through a more compact built form.
- The Peel Regional Official Plan and the Caledon Official Plan (both in effect and under review) have policies that support Lot Creation, such as the proposed, on adequately serviced lots that maintain community character and does not impact the Natural Heritage of the area.
- The inclusion of the McColl Drive Special Residential Area in the Minor Urban Centre of the NEP and as a part of the rest of the village indicates that new lot sizing policies that are more urban should be considered at this time. The CVC Regulated Areas, hazards and their associated setbacks and buffers to natural features do not extend onto these properties and there would be no setback requirements for any proposed severances on the subject properties
- Recent Provincial regulation mandates highlight an increased Provincial awareness and understanding of the need for housing in our Province and a general appetite to advance housing developments that represent good planning through the approval processes. We believe recent developments in this regard may help to contribute to a more favourable outcome for development on the Subject lands and assist in achieving more housing for Ontarians and to assist the Town of Caledon in achieving the Housing Pledge assigned to Caledon of 13,000 new homes by 2031. That in the absence of Zoning on the Property, that an RR – Rural Residential lot frontage and average lot sizing for partially serviced lots should be contemplated when determining what is achievable on the Subject Properties.
- And that it is our opinion that this proposed policy modification is not out of character for Inglewood Village and lands to the south consist of a residential subdivision with substantially smaller lots. Further, lands to the west within the *New Residential Neighbourhood A* consist of a new planned community with lots to be generally similar (0.48 ha.) as those proposed through this request. And further that the proposed change will not set a precedent for alterations to the Inglewood village Special Residential Area as these lots are fundamentally different in size and configuration.

- **Servicing Infrastructure:** The lots along McColl Drive are currently serviced by private septic infrastructure and an existing 150mm watermain. An EA for the Inglewood Wastewater treatment plant has been completed and identified upgrade works are currently ongoing and targeted for completion by mid- 2024 tentatively. For expanded wastewater to be connected to McColl Drive, Regional Planning Staff have confirmed that the residents along McColl would need to apply for the local improvement process. Any potential future lot creation even if serviced by private infrastructure, is supported by Regional initiatives. Further, as illustrated on the provided Consent Viability Sketch, potential new lots are sized appropriately (0.5 ha, 1.2 acres) which is large enough to accommodate private services as a should municipal services not be feasible
- **Rural Residential Zoning (RR):** In the absence of Town of Caledon Zoning on the Subject Lands due to NEC development control, and in order to develop the proposed severance concepts on Appendix 1, we have looked to the Town of Caledon Zoning By-laws Rural Residential designation as an appropriate zone for compatible zoning standards. A Minimum lot size of approximately 0.50 hectares and a minimum lot frontage of 30m has been applied. The frontage is measured from 9m front yard setback from the front property line as per the Zoning Definitions for RR Partially Serviced.

We trust this information is helpful in your review of the policies applicable to the ongoing Official Plan review and request to be circulated and included in the process on behalf of the owners. Should you have any questions, please contact Kevin Nunn at ext. 361.

Yours truly,

**Weston Consulting**

Per:



Martin Quarcoopome, BES, MCIP, RPP  
Vice President

- c. Regional Mayor Annette Groves  
Regional Councillor Christina Early  
Local Councillor Lynn Kiernan  
Tom Bremner  
Karin Heidolph-Bremner  
Jason Caruana  
Marcus Kormann



Steve Burke,  
Manager Strategic Policy Planning

October 5, 2023  
File 11388-1

Bailey Loverock, Team Lead, OP Review  
Town of Caledon  
6311 Old Church Road  
Caledon East, ON  
L7C 1J6

**RE: Town of Caledon Official Plan Review – Comments Response  
Properties of McColl Drive  
Town of Caledon (Village of Inglewood)**

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Weston Consulting has been retained by the property owners of 2 and 10 McColl Drive (the 'landowners') in the Village of Inglewood, to provide this Planning Opinion. The goal is to achieve lot severances for the properties along McColl Drive. Although formally retained by the owners of 2 and 10 McColl Drive, Weston has taken a comprehensive review of all of the properties along McColl Drive as a part of this letter. Furthermore, when referring to the 'subject properties' 'sites' or the 'study area' we are herein referring to all of 2, 6, 10, 16, 20, 24, 28, 25, 17, 11, 5, and 1 McColl Drive unless otherwise specified.

This letter is intended to be read as an update to the previously submitted correspondence (March 2023) which suggested revisions to the draft Official Plan, specifically Section 7.6.5.2 of the currently in-effect Official Plan which limits lots sizes in the Special Policy Area of the Inglewood Village to *average of 1.0 hectares*. The landowners of McColl Drive seek to revise this policy to allow for reduced lots of 0.5 hectare. It is understood that revisions to Secondary Plans are not contemplated at this time through this Official Plan review and are scheduled for a future review, however we believe this request can be accommodated at this time. The potential lot creations along on McColl Drive are an efficient way to modestly increase housing stock while protecting community character.

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Based on the current OP review process, the Town is currently undertaking public consultation sessions which will continue throughout 2023 and provide further updates will be based on comments received, ongoing analysis and any Provincial policy changes. We ask that this Letter be considered in the Town's preparation of the final draft Future Caledon Official Plan recommended for Council adoption in December 2023 and not to defer to beyond 2024 timelines. We are not requesting a comprehensive review of the Secondary Plan at this time, but do seek a minor revision to



allow for the logical and orderly development of underutilized lands that will have minimal impact on the Secondary Plan Area. The following planning analysis support the proposed reduction in lot size.

## CALEDON OFFICIAL PLAN AND INGLEWOOD VILLAGE SECONDARY PLAN

The current Town of Caledon Official Plan identifies the subject properties as *Special Residential* within the Inglewood Village Secondary Plan area (the 'secondary plan') found within Section 7.6 of the OP. Regarding lot creation, Section 7.10.6.1 of the in-effect Official Plan states that a lot may be created only if there is enough net developable area on both the severed lot and the retained lot to accommodate proposed uses, buildings and structures, including any accessory uses without encroachment on Key Natural Heritage Features or Hydrologically Sensitive Features. These considerations have been assessed and illustrated on the provided Consent Viability Sketch (Figure 1). This sketch identifies viable lots for additional lot creation highlighted in orange with potential severance lines designed (in draft form) that meet the general lot creation policies of this Official Plan.

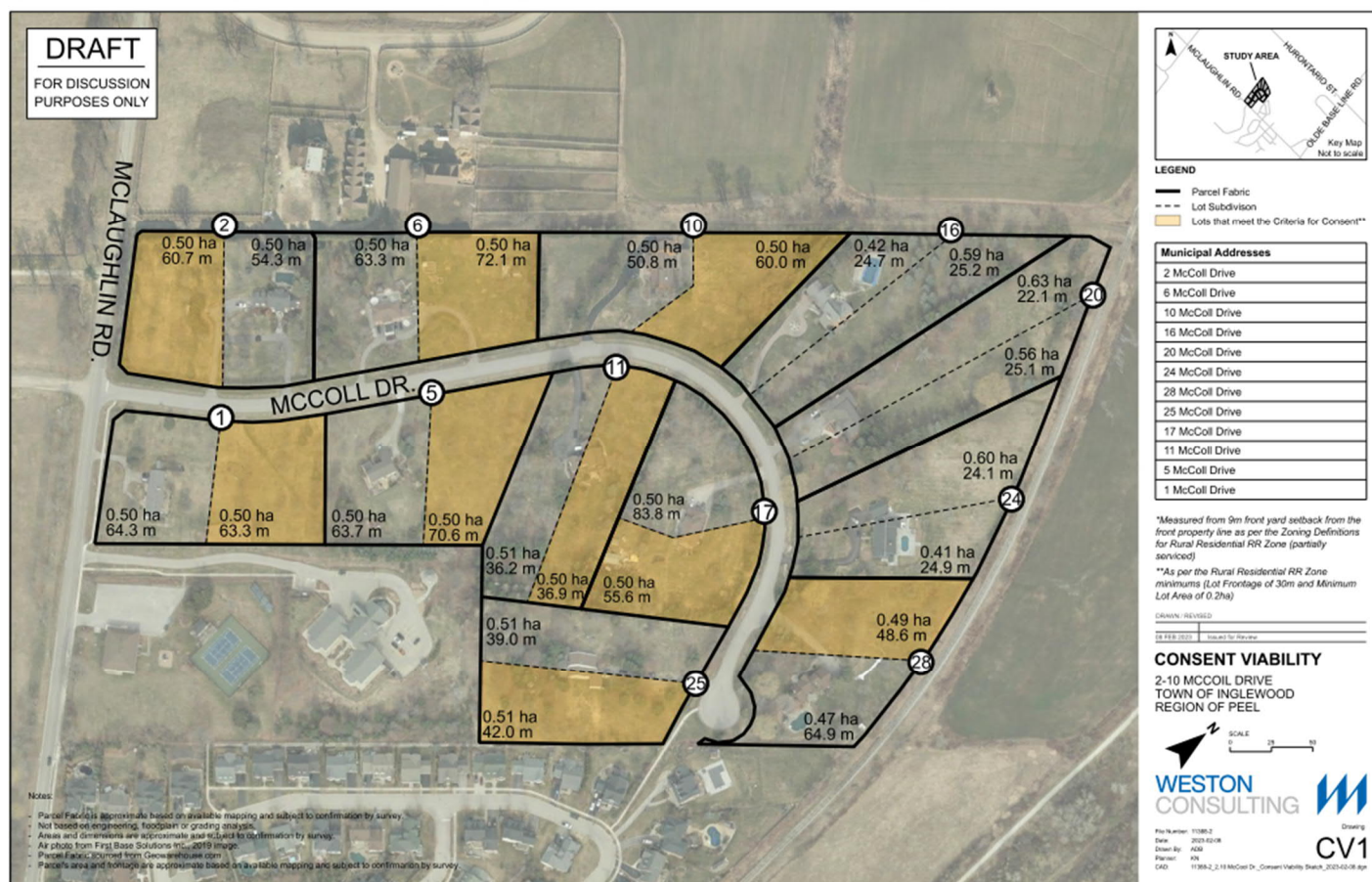


Figure 1. Consent Viability Sketch

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**Lot Sizing Specifications:** Section 7.6.5.2 of the in-effect provides policies for *Special Residential Areas* of the Inglewood Village Secondary Plan. It states that the *Special Residential Areas* designated on Schedule M of the current shall have an average lot size of 1.0 hectares and individual lots shall have access from internal roads only. The Landowners of McColl Road seek to modify this policy restricting lot size to 0.5 ha.

**Villages in Caledon:** Section 18.1 of the draft OP notes promotes the efficient use of exiting infrastructure and public services. Section 18.2 discourages the need for unjustified expansion of infrastructure and water/ waste water services. As noted in Figure 1 above, the proposed reduction of lots to 0.5 ha would result in the reaction of an additional 9 residential lots.

**Recent Inclusion within the Minor Urban Centre (NEP):** Inglewood Village Secondary Plan policy 7.6.5.2.3 notes that through a future policy review, the Town may request the Niagara Escarpment Commission (NEC) to amend the Inglewood Minor Urban Centre boundary to include the McColl Drive subdivision, if determined to be appropriate. This has been determined appropriate and the subject properties are now part of the Village in the Minor Urban Centre of the NEP. Given the subject properties inclusion within the *Minor Urban Centre* as shown on the draft Official Plan Schedule B2 Niagara Escarpment Plan Area (NEP) Land Use Designations, new lot sizes should be considered now that the land have been included in the Town's Urban Area and Settlements Area (draft OP Schedule B2 Growth Management). Further, the lot size permission of both the neighbouring residential communities directly to the south on North Riverdale Drive and to directly to the West in *New Residential Neighbourhood A* have minimum lot specifications which are closer aligned with what is being sought. We believe the unique character of the McColl Drive will continue be distinct even with reduced lot areas of 0.5 ha.

## SUMMARY & CONCLUSION

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We also conclude the following:

- Collectively and individually, the Provincial Policy Statement and A Place to Grow, promote efficient development and land use patterns such as the proposed severances for its contribution to supporting a range and mix of housing options, and minimizing land consumption through a more compact built form.
- The Peel Regional Official Plan and the Caledon Official Plan (both in effect and under review) have policies that support Lot Creation, such as the proposed, on adequately serviced lots that maintain community character and does not impact the Natural Heritage of the area.
- The inclusion of the McColl Drive Special Residential Area in the Minor Urban Centre of the NEP and as a part of the rest of the village indicates that new lot sizing policies that are more urban should be considered at this time. The CVC Regulated Areas, hazards and their associated setbacks and buffers to natural features do not extend onto these properties and there would be no setback requirements for any proposed severances on the subject properties
- Recent Provincial regulation mandates highlight an increased Provincial awareness and understanding of the need for housing in our Province and a general appetite to advance housing developments that represent good planning through the approval processes. We believe recent developments in this regard may help to contribute to a more favourable outcome for development on the Subject lands and assist in

achieving more housing for Ontarians and to assist the Town of Caledon in achieving the Housing Pledge assigned to Caledon of 13,000 new homes by 2031. That in the absence of Zoning on the Property, that an RR – Rural Residential lot frontage and average lot sizing for partially serviced lots should be contemplated when determining what is achievable on the Subject Properties.

- And that it is our opinion that this proposed policy modification is not out of character for Inglewood Village and lands to the south consist of a residential subdivision with substantially smaller lots. Further, lands to the west within the *New Residential Neighbourhood A* consist of a new planned community with lots to be generally similar (0.48 ha.) as those proposed through this request. And further that the proposed change will not set a precedent for alterations to the Inglewood village Special Residential Area as these lots are fundamentally different in size and configuration.
- **Servicing Infrastructure:** The lots along McColl Drive are currently serviced by private septic infrastructure and an existing 150mm watermain. An EA for the Inglewood Wastewater treatment plant has been completed and identified upgrade works are currently ongoing and targeted for completion by mid- 2024 tentatively. For expanded wastewater to be connected to McColl Drive, Regional Planning Staff have confirmed that the residents along McColl would need to apply for the local improvement process. Any potential future lot creation even if serviced by private infrastructure, is supported by Regional initiatives. Further, as illustrated on the provided Consent Viability Sketch, potential new lots are sized appropriately (0.5 ha, 1.2 acres) which is large enough to accommodate private services as a should municipal services not be feasible
- **Rural Residential Zoning (RR):** In the absence of Town of Caledon Zoning on the Subject Lands due to NEC development control, and in order to develop the proposed severance concepts on Appendix 1, we have looked to the Town of Caledon Zoning By-laws Rural Residential designation as an appropriate zone for compatible zoning standards. A Minimum lot size of approximately 0.50 hectares and a minimum lot frontage of 30m has been applied. The frontage is measured from 9m front yard setback from the front property line as per the Zoning Definitions for RR Partially Serviced.

We trust this information is helpful in your review of the policies applicable to the ongoing Official Plan review and request to be circulated and included in the process on behalf of the owners. Should you have any questions, please contact Kevin Nunn at ext. 361.

Yours truly,

**Weston Consulting**

Per:



Martin Quarcoopome, BES, MCIP, RPP  
Vice President

c. Regional Mayor Annette Groves  
Regional Councillor Christina Early

Local Councillor Lynn Kiernan  
Tom Bremner  
Karin Heidolph-Bremner  
Jason Caruana  
Marcus Kormann



## 41. Roger Payne

Mayor Grooves and members of council,

My name is Roger Payne and I live on Granite Stones Drive in Caledon.

I spoke at the council meeting in July, in support of Councillor Maskell's motion for after hours by-law enforcement.

During my delegation, I spoke of the issues we had been experiencing with noise from a business operating on Airport Road.

During my attendance, I had the opportunity to meet Mr. Andre Leitert, who is a part of the Caledon East Rural Neighbors group. He explained that they had been experiencing a great deal of noise issues from event centers in his area.

I asked if I could join his group and I have.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centers of a certain size. The size of the outbuildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event center while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centers in a 4 km radius. These centers avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit. Further, these centers are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Milcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income that is to neighboring farms and community friendly. What has happened with trucking yards is not. What is happening with the event centres now, is not.

I wish to strongly object to any changes to the Town's official plan that would make it easier or even possible for these illegal and tremendously disruptive events to continue. In fact, I very much in favor of changing the plan, to make it as difficult as possible for these events to take place.

Please feel free to contact me to discuss further.

**Roger Payne**



September 28, 2023

Bailey Loverock  
Team Lead, Official Plan Review/Senior Planner  
Town of Caledon  
6311 Old Church Rd  
Caledon ON L7C 1J6

Lesley Gill Woods  
Senior Planner, Secondary Plans Lead  
Town of Caledon  
6311 Old Church Rd  
Caledon ON L7C 1J6

Submitted by email to: [opreview@caledon.ca](mailto:opreview@caledon.ca) & [lesley.gillwoods@caledon.ca](mailto:lesley.gillwoods@caledon.ca)

Dear Bailey and Lesley,

**RE: COMMENT SUBMISSION ON THE "AUGUST 2023 DRAFT FUTURE CALEDON OFFICIAL PLAN" AND THE "CALEDON MAJOR TRANSIT STATION AREAS STUDY"**  
**OUR FILE: 2210A**

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Thank you for the opportunity to meet with you and gain a better understanding of this important initiative.

We also appreciate the opportunity to provide this more formal comment submission for consideration by the Town. As discussed, MHBC has been retained by Acorn Bolton Inc. ("Acorn") to review and provide comments on the proposed August 2023 Draft Caledon Official Plan ("Draft Caledon OP") and associated Caledon Major Transit Station Areas Study ("MTSA Study") relative to their lands located at 8264 King St and 14090 Duffy's Lane, now in the Regional Urban Boundary and within the community of Bolton (referred to hereafter as "Acorn Lands"), in the Town of Caledon (see **Figure 1** below). These lands were brought into the Regional Urban Boundary / System through the approval of Peel Region Official Plan, as adopted by By-law No. 20-2022.

Our comments pertaining to the Draft Caledon OP and MTSA Study are outlined further below and we look forward to working with Staff as these initiatives evolve.

**EXISTING POLICY CONSIDERATIONS**

**Peel Region Official Plan, as amended**

According to the approved Peel Region OP (PROP), Acorn's lands are designated as follows:

- "New Urban Area 2051" and "Urban Systems" (Schedule E-1, Regional Structure); and,
- "Designated Greenfield Area" (Schedule E-3, Growth Management)

The PROP sets out policies for growth management and the Urban System within Sections 5.4 and 5.6 respectively, which are applicable to the Acorn lands. In terms of growth management, the Regional OP provides direction to "develop compact, transit-supportive communities in Designated Greenfield Areas" and "to intensify development on underutilized lands", while also employing a "comprehensive, integrated approach to land use planning".



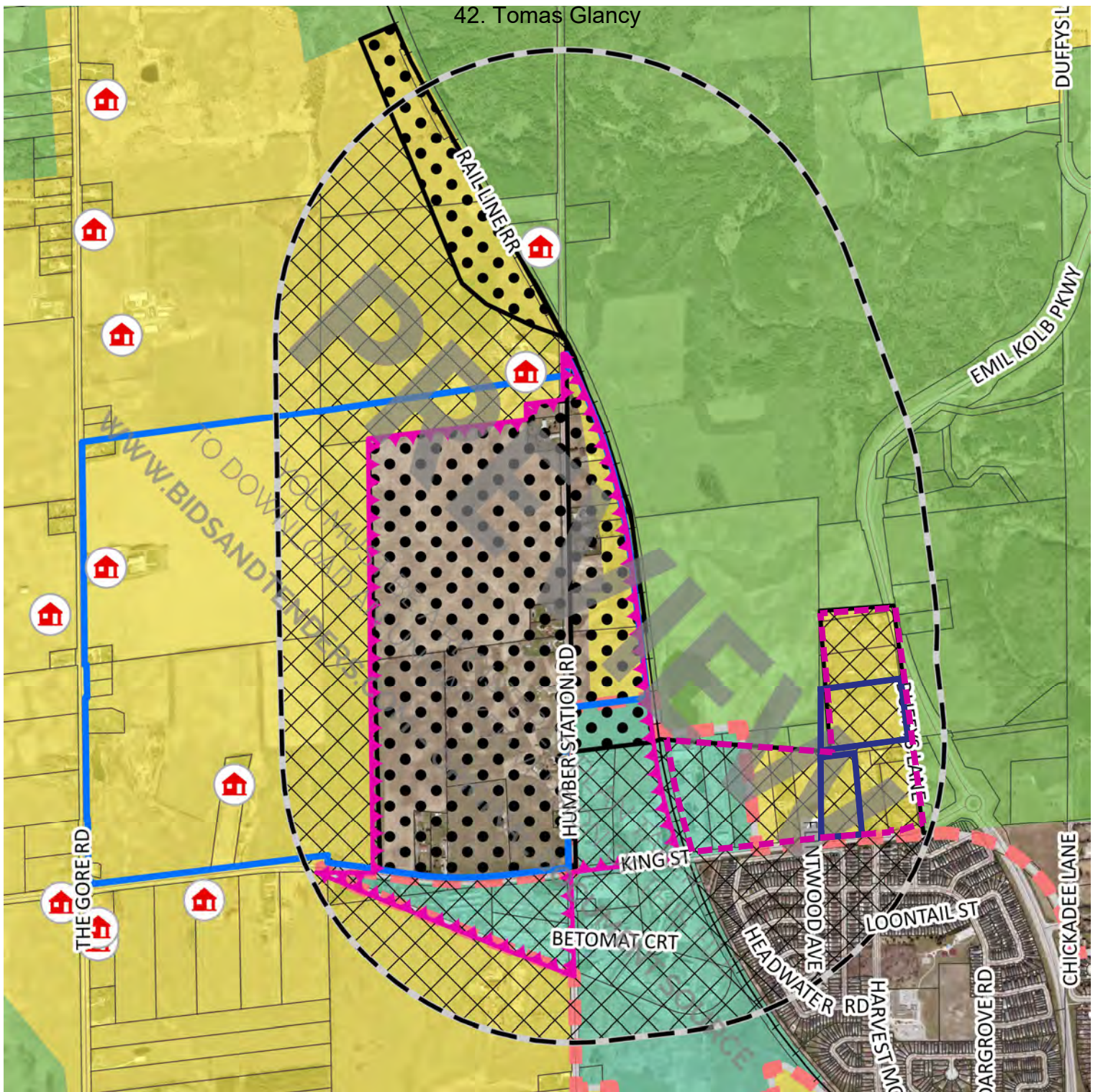


Figure 1

## Land Use Designation and Major Transit System Area

- |  |  |  |   |
|--|--|--|---|
|  | Acorn Lands  |  | Lands Subject to Interim Control By-Law for Major Transit Station Areas Study |
|  | Primary Major Transit Station Area   |  | Lands Subject to Zoning Order O.Reg 171/21 (Future Caledon GO Station Area)   |
|  | Bolton GO East Rounding Out Area   |  | Dry Industrial Land Use - Caledon Official Plan                               |
|  | 800m Buffer From GO Station Lands  |  | Provincially Significant Employment Zones (PSEZ)                              |
|  | Bolton Settlement Area   |  | Settlement Area Boundary Expansion (SABE) (Peel 2051)                         |
|  | Lands Subject to the Caledon Station / Macville Secondary Plan (OPA) Application |  | Protected Countryside   |
|  |  |  | Listed Heritage Property  |

DATE: August 10, 2023

SCALE 1:15000

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PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE  
B223

King Street & Duffy's Lane,  
Bolton, Ontario

While the Acorn lands are not situated within a Primary Major Transit Station Area (PMTSA) as delineated on Schedule E-5 of the Peel Region OP, they Acorn lands are situated entirely within the 800 metre radius of the Bolton GO PTMSA, where growth potential should also be promoted (where appropriate) to support the planned Bolton GO station.

### **Bolton GO Station**

Policy 2.2.4.2 of the Growth Plan states that *"for major transit station areas on priority transit corridors or subway lines, upper-and single-tier municipalities, in consultation with lower-tier municipalities, will delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station"*.

Despite Policy 2.2.4.2 of the Growth Plan and being located in close proximity to the planned Bolton GO Station, the area east of the rail corridor (including Acorn's lands) was not included in the PMTSA (see **Figure 2** below). This area, which includes the Acorn Lands, is referred to as the "Bolton GO East Rounding Out Area" for the purposes of this submission letter. This area is comprised of lands that are bounded by King Street to the South, Duffy's Lane to the East and the existing rail line to the west, with adjacent agricultural lands situated to the north. The Bolton GO East Rounding Out Area includes lands that were historically included within the settlement area (employment/industrial lands located on the east side of the existing railway line) and lands included within the 2051 New Urban Area in accordance with the new PROP (see **Figure 1**).

Prior to the adoption of the new PROP, the Town of Caledon had previously initiated the Bolton Residential Expansion Study (BRES) to determine where and how to accommodate new residential and population-related employment growth anticipated for the Bolton area. This Study identified a number of "Option Areas" as well as "Rounding Out Areas" to accommodate forecasted growth and associated development. Option Area 3 identified within the Study included lands which are now subject to the proposed Macville Secondary Plan (discussed further in this letter) as shown on Figure 2. The Acorn Lands were included as part of a Rounding Out Area within the BRES, which was initially recommended to be incorporated within the Option Area 3 due to it's large size, location adjacent to King Street, and the potential for a range of land use to be planned. The BRES was eventually adopted as Regional Official Plan Amendment No. 30 (ROPA 30) and modified by the Local Planning Appeal Tribunal on appeal, with the Rounding Out Area that included the Acorn Lands being included within a "Study Area Boundary", within which additional growth for Bolton beyond 2031 is anticipated to occur.

Following the approval of ROPA 30, a ministerial zoning order (MZO) was issued pursuant to O. Reg. 171/21 in respect of the lands upon which the Bolton GO Station will be constructed as well as adjacent lands to the west earmarked for residential development.

In December 2021, the Town also enacted an interim control by-law (ICBL) to control development to examine the mix of land uses within an MTSA study area surrounding the planned Bolton GO Station which included the Acorn Lands. This ICBL was extended for a second year and is set to expire in December 2023.

Ultimately, as noted above, the Rounding Out Area (as originally identified in the BRES, which included the Acorn Lands) was included as a Settlement Area Boundary Expansion (SABE) Community Area and subsequently incorporated into the 2051 New Urban Area within the new PROP, which was adopted by the Region in April 2022 and approved with modifications by the Minister in November 2022.



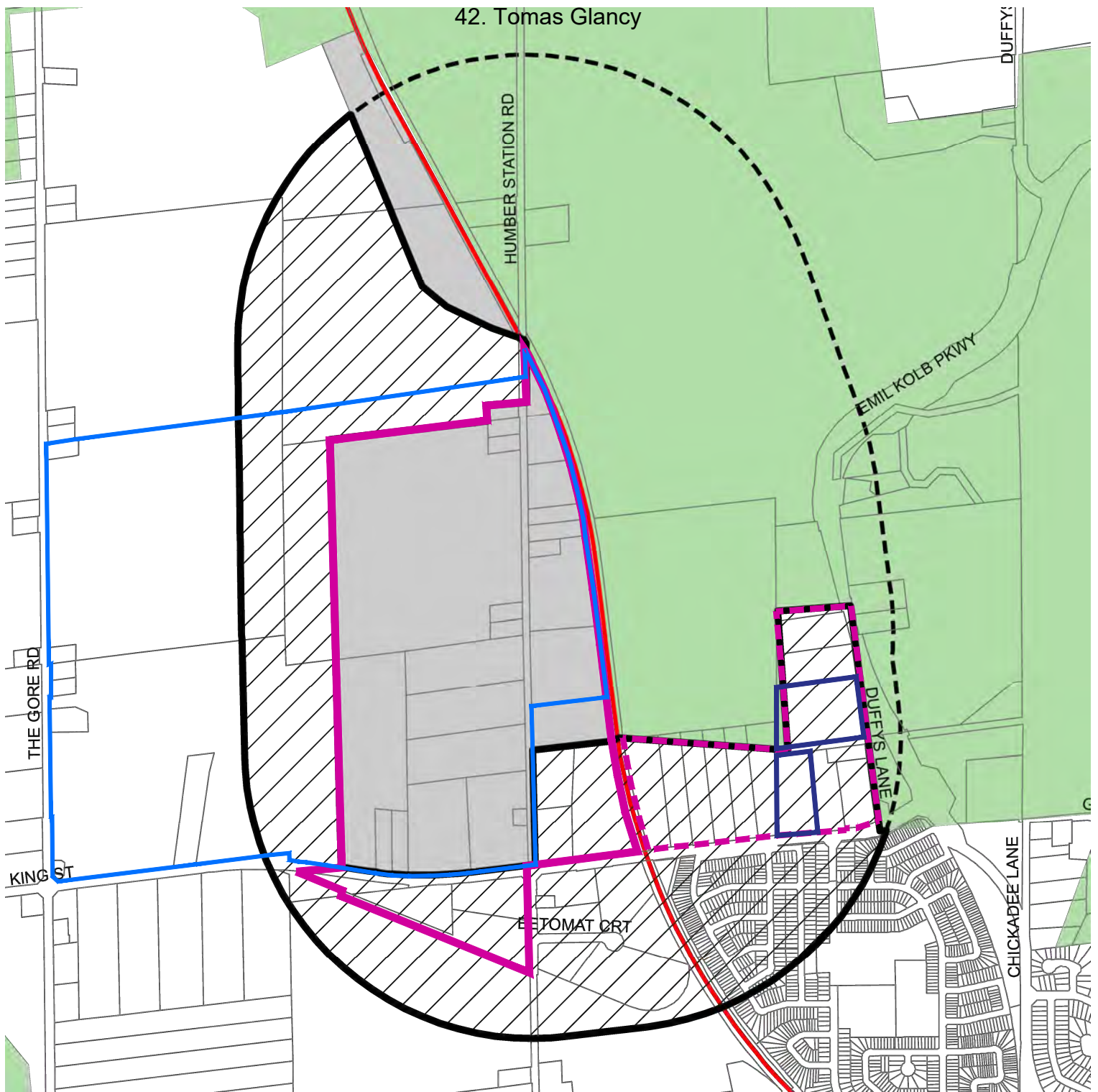


Figure 2

## Major Transit System Area

- Acorn Lands
- Primary Major Transit Station Area
- Bolton GO East Rounding Out Area
- 800m From GO Station
- Lands Subject to ICBL
- Lands Subject to O.Reg 171/21
- Greenbelt Plan
- Existing CP Rail/Caledon GO Rail Corridor
- Lands Subject to the Caledon Station/Macville Secondary Plan (OPA) Application

DATE: August 10, 2023

SCALE 1:15000



King Street & Duffy's Lane,  
Bolton, Ontario

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PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

B225

## **PROPOSED POLICY CONSIDERATIONS**

Following the direction of the BRES and the recent planning decisions of the Minister and Peel Region, it is our opinion that the Bolton GO East Rounding Out Area has significant growth potential and should be planned comprehensively by the Town of Caledon as part of the MTSA Study and/or future secondary plans for the lands in proximity to the planned GO Station, given:

- Growth Plan policy 2.2.4.2 direction;
- This area is within walking distance (800 m) of the planned GO Station;
- This area is located directly adjacent to the designated Bolton GO PMTSA;
- The lands include relatively large land parcels which are largely vacant making redevelopment feasible and imminent with minimal landowner coordination;
- Infrastructure, community services and facilities and pedestrian/transit connections should be comprehensively planned for development within walking distance of the GO Station and phased accordingly within the wider area and not on an ad hoc basis;
- Comprehensive planning in this manner will allow for a well integrated and designed transportation network and servicing connections needed to support a transit-supportive community;
- The future Bolton GO Station is appropriately utilized by bringing all proximate and walkable lands online concurrently in an efficient and comprehensive manner.

Alternatively, if not included in a Town-initiated secondary plan, the Bolton GO East Rounding Out Area lands risk being left as a small, isolated area outside of the development / secondary plan area and potentially disconnected from transportation and servicing networks planned within the area.

### **Proposed Caledon Station / Macville Secondary Plan (privately-initiated)**

Acorn is aware that an application has been made by the Bolton Option 3 Landowner Group (Caledon Community Partners) for a privately-initiated secondary plan that includes lands to the west of the railway line, approximately 400m from the Acorn lands, and additional lands outside of the MZO and ICBL/MTSA Study Area boundary. It is also understood that this plan is currently under appeal by the applicant for a non-decision by the Town.

### **Proposed Draft Caledon OP Review and Caledon MTSA Study**

In the current Draft Caledon OP (dated August 2023), the Bolton GO East Rounding Out Area is proposed to be designated as follows:

- "Urban Area" (Schedule B1, Town Structure)
- "Designated Greenfield Area" and "Built-up Area" (Schedule B2, Growth Management)
- "New Community Area" (Schedule B4, Land Use Designations)

The Bolton GO East Rounding Out Area is included in the MTSA Study Area and has also been made subject to the ICBL to allow this Study to be completed comprehensively.

Acorn supports the Town's inclusion of these lands in this initiative.

## REQUEST

Given that the Acorn lands are within walking distance (within 800 metres) of the Bolton GO Station and given direction provided in the Growth Plan to plan major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users, **it is respectfully requested that the Bolton GO East Rounding Out Area (shown on Figure 2 of this submission) be subject to area-specific policy** in the Town's new Official Plan that:

1. Recognizes the Bolton GO East Rounding Out Area for its unique potential for growth despite being outside of the PMTSA delineated by the Region;
2. Stipulates that the Bolton GO East Rounding Out Area be included in any secondary plan initiatives associated with the PMTSA so that this Area is properly considered and planned comprehensively and/or concurrently with lands within the PMTSA given that they are within walking distance of the Bolton GO Station and are directly adjacent to the PMTSA on the north side of King Road, ensuring that land use, servicing, transportation, community services and facilities and pedestrian linkages are considered comprehensively;
3. Recognizes that any exclusion of the Bolton GO East Rounding Out Area would result in an isolated pocket of land that may not achieve its full development potential despite being within a node containing high capacity transit infrastructure and contradict Growth Plan policy (specifically Policy 2.2.4.2).

Recommended policy and policy revision are attached in **Appendix A** (Draft Official Plan policy) and **Appendix B** (Future Policy coming out of MTSA Study) for Staff's consideration.

We welcome the opportunity to work with Town staff and their consultants to clarify and further discuss the comments included in our submission. As always, we would be pleased to meet to review and further discuss our comments.

Yours truly,

**MHBC**



Debra Walker, BES, MBA, MCIP, RPP  
Partner



Tomas Glancy,  
Senior Planner

cc. *Steve Burke, Town of Caledon*  
*Acorn Bolton Inc.*

**APPENDIX A****Requested revisions to the latest version of the draft Official Plan Policy**

(Letter from MHBC to Town re Acorn Bolton Inc. dated September 28, 2023)

<b>Note:</b> Red text is a requested addition	
<b>22.2 New Community Area Designation</b>	
<b>22.2.3 a) Land Use Designations</b>	
<b>Proposed Revision:</b>	<p>a) Within New Community Areas, the land use designations will include:</p> <p>i) Urban Centres (Major Transit Station Areas and lands within 800 metres of the Bolton GO Station that are designated New Community Areas – see Policy 22.3.5(a))</p>
<b>22.3 Urban Centre Designation</b>	
<b>Proposed Revision:</b>	<p>This designation is intended to be applied to the lands conceptually shown as Urban Centre on Schedule B1, Town Structure. These two Urban Centres, located in Mayfield West and Bolton, are also identified as Major Transit Station Areas and lands within 800 metres of the Bolton GO Station that are designated New Community Areas.</p>
<b>22.3 Urban Centre Designation</b>	
<b>22.3.3 Minimum Densities</b>	
<b>Proposed Addition:</b>	<p>a) The Bolton GO Primary Major Transit Station Area, as delineated on Schedule C1, Town-wide Transportation Network, will be planned to achieve a minimum density of 150 people and jobs combined per hectare. Lands within 800 metres of the Bolton GO Station that are designated New Community Areas but outside of the Bolton GO Primary Major Transit Station Area will be planned to achieve a minimum density of 100* people and jobs combined per hectare.</p> <p>*Note: Alternatively, this proposed policy could otherwise state that the appropriate density (between 50 and 150 people and jobs combined per hectare) could be determined as part of the Caledon Major Transit Station Areas Study.</p>
<b>22.3 Urban Centre Designation</b>	
<b>22.3.5 Caledon Major Transit Station Areas Study</b>	
<b>Proposed Revision:</b>	<p>a) The Caledon Major Transit Station Areas Study recommendations will:</p> <p>i) Provide for a specific delineation of the Urban Centre designation;</p> <p>ii) Provide detailed land use policies to be incorporated into comprehensive development plans for the Bolton GO Primary Major Transit Station Area and the Mayfield West Planned Major Transit Station Area; and</p> <p>iii) be incorporated into policy through a future Official Plan Amendment.</p>



**APPENDIX B**

**Caledon Major Transit Station Areas Study – Future Policy**

(Letter from MHBC to Town re Acorn Bolton Inc. dated September 28, 2023)

In addition to the revisions requested in Appendix A, it is recommended that the Bolton GO East Rounding Out Area (identified on Figure 2 of this submission) be:

1. Included in the delineation of the Urban Centre designation.
2. Recognized for its unique potential for growth and that an appropriate minimum density be determined for this Area provided it is greater than 50 people and jobs combined per hectare and less than 150 people and jobs combined per hectare.
3. Included in any secondary plan initiatives associated with the Bolton GO PMTSA so that the Bolton GO East Rounding Out Area is properly considered and planned comprehensively with lands within the PMTSA. This is appropriate given that they are within walking distance of the Bolton GO Station and are directly adjacent to the PMTSA on the north side of King Road, ensuring that land use, servicing, transportation, community services and facilities and pedestrian linkages are considered comprehensively.



September 29, 2023

Sent via email [Steven.Burke@caledon.ca](mailto:Steven.Burke@caledon.ca)

The Corporation of the Town of Caledon  
c/o City Clerk's Department  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

Attention: Steve Burke, Manager, Strategic Policy Planning

Re: **Draft Future Caledon: Our Official Plan – August 2023 (the “Draft Official Plan”)  
Comments of Aecon Infrastructure Management Inc. (“Aecon”)  
Town of Caledon (the “Town”) and the Region of Peel (the “Region”)**

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We are writing to you on behalf of our client, Aecon, which owns Aggregate Pit #6506, more commonly known as the “Caledon Pit”. The Caledon Pit is approximately 572 hectares (1,413 acres) in total area and is actively operating as an aggregate extraction site. The Caledon Pit is located on the western periphery of Caledon Village in Concessions 1, 2 and 3, south of Charleston Sideroad, north of West Caledon Pit #6622, west of Hurontario Street, and east of Fork of the Credit Provincial Park (Refer to **Schedule A**).

Extraction will be concluded for certain parts of the Caledon Pit in the near future, allowing Aecon to begin its rehabilitation process. Aecon is exploring opportunities for the reuse of the Caledon Pit with a focus on how best to ensure the lands become an integral part of Caledon Village. A similar theme has been explored by the Town through the 2021 Belfountain and Caledon Rehabilitation Master Plan (the “RMP”) with discussion continuing in the Supplementary Aggregate Resources Policy Study.

The purpose of this letter is to provide our comments regarding the August 2023 version of the Draft Official Plan. The intention is to ensure that the future potential land development opportunities and constraints regarding the Caledon Pit are captured in Official Plan Policy. One way of achieving that would be through the creation of a “Special Policy Area”, a concept we would be pleased to develop in concert with Staff. Such a concept would allow for a more supportive framework for integrating the rehabilitated lands into the community while working toward the vision contained in the RMP.

We previously submitted our comments on the June 2023 version of the Draft Official Plan on August 25<sup>th</sup>, 2023. We understand that there is an on-going review of the Official Plan and there will be further updates based on comments received and potential Provincial policy changes. We are aware that it is the Town's goal to have a final Draft Official Plan presented to Council for consideration in December 2023.



## **Key Draft Policies and our Responses**

### *Growth Phasing and Coordination*

- Part B, Policy 4.1.3 indicates that there will be limited growth outside of the Urban Area, for example in the Villages and Hamlets and lands adjacent to them. Part B, Policy 4.1.4 along with Part E, Policy 18.2.1 and 18.2.10 similarly limit growth in the Rural System.

**Response:** Important visionary work is contained in the Town's RMP which found that growth in some areas surrounding Caledon Village would be appropriate as part of the rehabilitation of aggregate operations in the area. Though the policies noted above are appropriate for many areas, some flexibility is warranted when it comes to the rehabilitation of aggregate operations that could be made part of an existing Village or Hamlet. Flexibility could be achieved by identifying those unique instances where lands have the potential to complement existing rural communities with a "Special Policy Area" identifier as proposed for the Caledon Pit on **Schedule B**. The purpose of the "Special Policy Area" would be to create a structure for further study on how best to incorporate the lands into existing communities as a step toward unlocking the potential identified in the RMP. The "Special Policy Area" approach would also help harmonize the Draft Official Plan, for example, by complementing Part E, Policy 17.10.2(e)(ii) and 18.2.12.

### *Settlement Area Boundary Expansions*

- Part B, Policy 4.5.1 and Part G, Policy 24.1.3 of the Draft Official Plan require Settlement Area Boundary Expansions to occur only through a municipal comprehensive review ("MCR") conducted by the Region. Proposed policy changes in the new Provincial Planning Statement (the "2023 PPS") would remove the requirement for settlement areas to be expanded or established only through an MCR. Instead, the 2023 PPS will allow for such expansions to be proposed and considered through Official Plan Amendments initiated at any time based on more suitable, stream-lined criteria.

**Response:** In our opinion, the Town's Official Plan should guide future decision making over the longer-term. Accordingly, the policies should reflect the enactment of *The Hazel McCallion Act* which will dissolve Peel Region on January 1, 2025. The policies should also reflect the approach to Settlement Area Boundary expansions expected in the 2023 PPS, which could be supported by the inclusion of a "Special Policy Area" identifier as mentioned above.

### *Drinking Water and Wastewater Servicing in Rural Areas*

- Part C, Policy 12.3.8 states that the Town will require the proponent of a proposed development in the Rural System, in the absence of municipal sewage services and/or municipal water services, to provide a comprehensive assessment of alternative methods of providing sewage and water services, where appropriate.



**Response:** We are supportive of this proposed policy as it indicates that the Town would be open to working with proponents in delivering water and wastewater services at a scale suitable for rural areas. For example, private communal water and wastewater systems are viable options for rural areas and one that Aecon is considering.

We note again reference to the Region in this policy language and suggest that it be replaced with the notion of suitability, feasibility, and sustainability over the long-term.

*Other Natural and Human-made Hazards*

- Part D, Policy 16.6.1 states that the Town will prohibit, where appropriate, development on, abutting, or adjacent to lands affected by human-made hazards such as oil, gas, and salt hazards, or former mineral aggregate operations, in accordance with the objectives and policies in this Plan and provincial policy.

**Response:** The RMP contemplates future development of former aggregate sites. We encourage the Town to consider flexible policy language as it relates to the rehabilitated aggregate sites and former mineral aggregate operations as extensive studies, or site investigations will be undertaken to advance the development on former aggregate sites and the subsequent conversion to support residential/employment development.

*Caledon High Potential Mineral Aggregate Resource Area Mapping/Criteria*

- Part E, Policy 20 indicates that Mineral Aggregate Policies will be added through a future phase of the Official Plan Review.

**Response:** We look forward to working with the Town to establish Mineral Aggregate Policies. In our opinion, the Mineral Aggregate Policies should build on the concepts in the RMP, which contemplated the development of community uses on a portion of the aggregate sites surrounding Caledon Village. The RMP represents a comprehensive vision for the reuse of aggregate sites surrounding Caledon Village, including a portion of the Caledon Pit lands. The RMP envisions a future where former extraction sites are integrated with the community through a range of land uses, including residential uses.

We would like to again acknowledge the work the Town of Caledon staff have done to develop the Draft Caledon Official Plan and for your consideration of our comments. Should you have any questions, please do not hesitate to contact the undersigned.

Yours Very Truly,

*Andrew Lam*

Andrew Lam, BURPI  
Delta Urban Inc.





cc. Peter Karczmarczyk, Aecon Construction Group Inc.  
Adam Borgatti, Aecon Construction Group Inc.  
Alistair MacCallum, Aecon Construction Group Inc.  
Alex Lusty, Davies Howe LLP  
Meaghan McDermid, Davies Howe LLP  
Mustafa Ghassan, Delta Urban Inc.  
Roman Winnicki, Delta Urban Inc.

*Enclosed.*      Schedule A – Caledon Aggregate Pit #6506 Lands  
Schedule B – Proposed Special Policy Area Boundary

# Schedule A: Caledon Aggregate Pit #6506 Lands







## LEGEND



PROPOSED SPECIAL POLICY AREA BOUNDARY



8800 Dufferin St, Suite 104  
Vaughan, ON, L4K 0C5  
Tel: (905) 660-7667 | Fax: (905) 660-7076

**B235**

Date: September 29, 2023





**VIA EMAIL**

September 29, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – August 2023 Draft  
Comments on Behalf of Choice Properties REIT**  
**Our File: CHO/CAD/20-01**

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We are the planning consultants for Choice Properties (“Choice”) for the Town of Caledon Official Plan Review. Choice is the owner of lands within the Town of Caledon (the “Choice Lands”), including:

- 487 Queen Street South;
- 99 McEwan Drive East; and
- 0 and 12245 Torbram Road and 12542 Airport Road.

At this time, Choice does not have specific plans for the redevelopment of 487 Queen Street South and 99 McEwan Drive East, and are seeking to maintain existing operations while allowing for short- and medium-term modest infill or expansion to respond to the market demand.

The Choice Lands 0 and 12245 Torbram Road and 12542 Airport Road, received a Minister’s Zoning Order (O.Reg.483/22), and applications for an Official Plan Amendment (POPA 2021-0007) and Draft Plan of Subdivision (21T-21002C) are currently under review by the Town. The site is over 480 acres and will be used for warehousing, distribution centres, and other industrial uses.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of Choice, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review, for which we submitted preliminary comments on July 27, 2023. The Town of Caledon released a third Draft Official Plan in August 2023 for public review. On behalf of Choice, we have preliminary comments as outlined below, and will continue to review the August 2023 Draft Official Plan in detail, and may provide further comments as required.



Based on our review of the Draft Official Plan:

- On Schedule B1 Town Structure, the Choice Lands are shown as Urban Area. 0 and 12245 Torbram Road and 12542 Airport Road have portions of the lands shown as Natural Environment System. 487 Queen Street South is shown located along the Urban Corridor (Queen Street). Additionally, 487 Queen Street South appears to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;
- On Schedule B2 Growth Management, 487 Queen Street South and 99 McEwan Drive East are shown as Built-Up Area. 487 Queen Street South is located along the Urban Corridor (Queen Street) and appears to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre. 0 and 12245 Torbram Road and 12542 Airport Road are shown as New Urban Area 2051 and Designated Greenfield Area;
- On Schedule B4 Land Use Designations, 487 Queen Street South and 99 McEwan Drive East are shown as “Refer to the 1976 Official Plan”. 0 and 12245 Torbram Road and 12542 Airport Road are primarily shown as New Employment Area, yet includes other designations including Natural Features and Areas and Rural Lands;
- On Schedule C1 Town – Wide Transportation Network, 487 Queen Street South is located along a Regional Arterial Road (Queen Street). 0 and 12245 Torbram Road is located along a Town Arterial Road (Torbram Road) and 12542 Airport Road is located on a Regional Arterial Road (Airport Road); and
- On Schedule C2 Road Right-of-Way Widths, 487 Queen Street South is shown with a 45 m ROW (not identified under current Official Plan). Both 12245 Torbram Road and 12542 Airport Road are shown with a 36 m ROW.

**We reiterate our general comments, including:**

- **We reiterate our general comments that we are concerned with the implications of the draft Official Plan policy framework for the Choice Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies; and**
- **We reiterate our general comment that the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. Section 21 of the Draft Official Plan states, “These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses”, whereby we understand that the Town is projecting that the land use designations will not form a part of this Official Plan. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that it would be premature to proceed with consideration of the Official Plan without the land use schedules for the Urban System.**

For the comments below, please note that the references below to “Formerly” refers to the Policies and Sections under the June 2023 draft Official Plan. At this time, our preliminary comments for the August 2023 Draft Official Plan are as follows:

- The Choice Lands at 0 and 12245 Torbram Road and 12542 Airport Road are subject to an approved Minister’s Zoning Order (O.Reg.483/22), as well as active Official Plan Amendment and Draft Plan of Subdivision applications. **We reiterate our comments seek clarification as to how approved Minister’s Zoning Orders and active applications are to be addressed in the draft Official Plan, including any transitional matters;**
- A Neighbourhood Centre has been identified on Schedules B1 and B2, and appears to be located in proximity to 487 Queen Street South. It appears as if the Neighbourhood Centre has been moved south from the March 2022 draft, and we seek clarification as to the proposed extent of the Neighbourhood Centre. **We reiterate our previous comment that it is appropriate to consider the Choice Lands as part of the Neighbourhood Centre;**
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **We reiterate that in our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;**
- Policy 7.2.3 states “All development in the Urban System will: ... b) adhere to the design policies in Part F, Urban System.” **We request clarification as to what specific design policies are being referenced;**
- Policy 7.3.13 (formerly Policy 7.5.3) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the Choice Lands);**
- Policy 7.7.1 states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... e) on larger sites, use existing or create new publicly accessible mid-block pedestrian connections. Mid-block connections should be direct, logical, and continuous to limit the need for added wayfinding measures.” **In our submission, flexibility should be added to the policy by adding “where appropriate” before “use existing or create” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian connections. In addition, we request clarification as to the**

- two similar policies 7.3.13 and 7.7.1 in terms of what is the difference between “pedestrian linkages” and “pedestrian connections”;
- Policy 7.8.6 states “Building servicing, as well as parking, access, loading, and waste collection areas, will be integrated into the building design, located away from sensitive land uses, and be separated and screened from the public realm.” **We note the similar Policy 7.7.1 that states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... c) ensure site servicing components are functional, attractive and appropriately screened from view from the public realm. Loading areas, utilities/mechanical equipment, should be located and integrated within a building. Where not feasible, these elements should be directed away and screened from the public realm” where there is flexibility. In our submission, similar flexibility should be added to Policy 7.8.6;**
  - Policy 7.8.7 states “Commercial buildings will be designed to enhance the pedestrian experience, dividing building frontage along units, and providing building articulation along their façades.” **We request clarification as to what is intended by “dividing building frontage along units”;**
  - Policy 12.7.2 (Formerly Policy 12.5.2) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We reiterate our comment that flexibility through encouragement language should be incorporated since amenity spaces are not appropriate under all circumstances;**
  - Policy 21 states “The policies of Part F establish the land use designations and supporting policies to implement the Urban System components of the Town Structure in accordance with the Plan’s vision and guiding principles. These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses.” **We reiterate our general comment and suggest it is premature to approve the Official Plan as drafted, without the land use schedule for the Urban System;**
  - Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We note our general comment above and reserve the opportunity to participate in the detailed review of the existing secondary plans;**
  - Policy 22.4 Neighbourhood Centre Designation states “The Neighbourhood Centre designation is intended to be applied to the lands conceptually shown as Neighbourhood Centre on Schedule B1, Town Structure.” **We reiterate our comment seeking clarification of the extent of the Neighbourhood Centre Designation;**
  - Policy 22.4.1 states “The planning objectives for the Neighbourhood Centre designation are as follows: a) facilitate mid-rise forms of development...”. However, Policy 22.4.3 f) states “Buildings as high as 15 to 20 storeys may be permitted.” **In our submission, the objective of Neighbourhood Centre should**

**be revised to also recognize permissions for high-density forms of development in accordance with Policy 22.4.3f);**

- Policy 23.5.2 a) (Formerly Policy 5.24.33) states “Accessory outdoor storage for the purposes of this policy is the outdoor storage of raw materials, finished materials and/or commodities that is accessory to the principal use of the property, with that principal use located within a building(s). **We reiterate our comment that requesting clarification** that outdoor sales and display associated with a commercial use is not interpreted as outdoor storage and in our submission “New” should be added before “Outdoor Storage” in order to recognize existing outdoor storage that has been approved by the Town through site plan control;
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **We reiterate that in our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
- Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. **We reiterate our comments suggesting Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;**
- Policy 24.5.1 states “The Town will require a comprehensive development plan to be incorporated into this Plan through an official plan amendment to provide detailed direction for defined areas within the Urban Area where the following elements from Schedule B1, Town Structure, are to be implemented: a) Urban Centres; b) Neighbourhood Centres; c) Urban Corridors; and, d) Knowledge and Innovation Corridors”. We seek clarification as to what a “defined area” is considered, and where that is established. **A comprehensive development plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.5.1 “will” be changed to “may” in order to provide clarity.** It is unclear as to why a comprehensive development plan is required for certain areas such as Neighbourhood Centres or Urban Corridors, in the context of the Town’s preparation of Secondary Plans for the Urban Areas. **We reiterate our comments suggesting that the requirement of a comprehensive development plan be reconsidered,** including how this layer of analysis may conflict with draft policy 9.5.2b) as it relates to the town’s intention to pre-zone lands to support intensification and expedite housing growth; and
- Policy 25.5.7 a) states “The Town will require a comprehensive landowner group agreement that sets out the financial requirements for growth-related infrastructure and community services among participating landowners.” **In our submission, we suggest “where required” be added to the beginning in order to provide clarity.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.



September 29, 2023

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Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Choice Properties REIT (Via Email)



**VIA EMAIL**

September 29, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – August 2023 Draft  
Preliminary Comments on Behalf of Rock Developments (Bolton  
Square Ltd. and 1732115 Ontario Inc.)**

**Our File: ROD/CAD/22-01**

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We are the planning consultants for Bolton Square Ltd. and 1732115 Ontario Inc. (“Rock Developments”) for the Town of Caledon Official Plan Review. Rock Developments is the owner of approximately 2.25 ha (5.55 ac) of lands within the Town of Caledon (the “Rock Lands”), located at 405 Queen Street South.

The Rock Lands are currently developed as a single storey commercial retail plaza, and built with three existing buildings. Rock Developments has submitted a pre-consultation request to the Town, whereby it is their intent to comprehensively redevelop the Rock Lands for higher density purposes and a possible mix of residential/commercial uses.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of Rock Developments, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review, for which we submitted preliminary comments on July 27, 2023. The Town of Caledon released a third Draft Official Plan in August 2023 for public review. On behalf of Rock Developments, we have preliminary comments as outlined below, and will continue to review the August 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule B1 Town Structure, the Rock Lands are shown as Urban Area and located along the Urban Corridor (Queen Street). The Rock Lands appear to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;
- On Schedule B2 Growth Management, the Rock Lands are shown as Built-Up Area and located along the Urban Corridor (Queen Street). The Rock lands appear to be located in proximity to a Neighbourhood Centre. We seek clarification as to the extent of the Neighbourhood Centre;

- On Schedule B4 Land Use Designations, the Rock Lands are shown as “Refer to the 1976 Official Plan”;
- On Schedule C1 Town – Wide Transportation Network, the Rock Lands are located along a Regional Arterial Road (Queen Street); and
- On Schedule C2 Road Right-of-Way Widths, Queen Street South is shown with a 45 m ROW (not identified under current Official Plan).

**We reiterate our general comments, including:**

- **We reiterate our general comments that we are concerned with the implications of the draft Official Plan policy framework for the Rock Development Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies; and**
- **We reiterate our general comment that the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. Section 21 of the Draft Official Plan states, “These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses”, whereby we understand that the Town is projecting that the land use designations will not form a part of this Official Plan. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that it would be premature to proceed with consideration of the Official Plan without the land use schedules for the Urban System.**

For the comments below, please note that the references below to “Formerly” refers to the Policies and Sections under the June 2023 draft Official Plan. At this time, our preliminary comments for the August 2023 Draft Official Plan are as follows:

- A Neighbourhood Centre has been identified on Schedules B1 and B2, and appears to be located in proximity to 487 Queen Street South. It appears as if the Neighbourhood Centre has been moved south from the March 2022 draft, and we seek clarification as to the proposed extent of the Neighbourhood Centre. **We reiterate our previous comment that it is appropriate to consider the Rock Development Lands as part of the Neighbourhood Centre;**
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **We reiterate that in our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific**

- context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;
- Policy 7.2.3 states “All development in the Urban System will: ... b) adhere to the design policies in Part F, Urban System.” **We request clarification as to what specific design policies are being referenced;**
  - Policy 7.3.13 (formerly Policy 7.5.3) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the Rock Development Lands);**
  - Policy 7.7.1 states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... e) on larger sites, use existing or create new publicly accessible mid-block pedestrian connections. Mid-block connections should be direct, logical, and continuous to limit the need for added wayfinding measures.” **In our submission, flexibility should be added to the policy by adding “where appropriate” before “use existing or create” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian connections. In addition, we request clarification as to the two similar policies 7.3.13 and 7.7.1 in terms of what is the difference between “pedestrian linkages” and “pedestrian connections”;**
  - Policy 7.8.6 states “Building servicing, as well as parking, access, loading, and waste collection areas, will be integrated into the building design, located away from sensitive land uses, and be separated and screened from the public realm.” **We note the similar Policy 7.7.1 that states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... c) ensure site servicing components are functional, attractive and appropriately screened from view from the public realm. Loading areas, utilities/mechanical equipment, should be located and integrated within a building. Where not feasible, these elements should be directed away and screened from the public realm” where there is flexibility. In our submission, similar flexibility should be added to Policy 7.8.6;**
  - Policy 7.8.7 states “Commercial buildings will be designed to enhance the pedestrian experience, dividing building frontage along units, and providing building articulation along their façades.” **We request clarification as to what is intended by “dividing building frontage along units”;**
  - Policy 12.7.2 (Formerly Policy 12.5.2) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We reiterate our comment that flexibility through encouragement language**



**should be incorporated since amenity spaces are not appropriate under all circumstances;**

- Policy 21 states “The policies of Part F establish the land use designations and supporting policies to implement the Urban System components of the Town Structure in accordance with the Plan’s vision and guiding principles. These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses.” **We reiterate our general comment and suggest it is premature to approve the Official Plan as drafted, without the land use schedule for the Urban System;**
- Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We note our general comment above and reserve the opportunity to participate in the detailed review of the existing secondary plans;**
- Policy 22.4 Neighbourhood Centre Designation states “The Neighbourhood Centre designation is intended to be applied to the lands conceptually shown as Neighbourhood Centre on Schedule B1, Town Structure.” **We reiterate our comment seeking clarification of the extent of the Neighbourhood Centre Designation;**
- Policy 22.4.1 states “The planning objectives for the Neighbourhood Centre designation are as follows: a) facilitate mid-rise forms of development...”. However, Policy 22.4.3 f) states “Buildings as high as 15 to 20 storeys may be permitted.” **In our submission, the objective of Neighbourhood Centre should be revised to also recognize permissions for high-density forms of development in accordance with Policy 22.4.3f);**
- Policy 23.5.2 a) (Formerly Policy 5.24.33) states “Accessory outdoor storage for the purposes of this policy is the outdoor storage of raw materials, finished materials and/or commodities that is accessory to the principal use of the property, with that principal use located within a building(s). **We reiterate our comment that requesting clarification** that outdoor sales and display associated with a commercial use is not interpreted as outdoor storage and in our submission “New” should be added before “Outdoor Storage” in order to recognize existing outdoor storage that has been approved by the Town through site plan control;
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **We reiterate that in our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
- Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. **We reiterate our**

**comments suggesting Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;**

- Policy 24.5.1 states "The Town will require a comprehensive development plan to be incorporated into this Plan through an official plan amendment to provide detailed direction for defined areas within the Urban Area where the following elements from Schedule B1, Town Structure, are to be implemented: a) Urban Centres; b) Neighbourhood Centres; c) Urban Corridors; and, d) Knowledge and Innovation Corridors". We seek clarification as to what a “defined area” is considered, and where that is established. **A comprehensive development plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.5.1 “will” be changed to “may” in order to provide clarity.** It is unclear as to why a comprehensive development plan is required for certain areas such as Neighbourhood Centres or Urban Corridors, in the context of the Town’s preparation of Secondary Plans for the Urban Areas. **We reiterate our comments suggesting that the requirement of a comprehensive development plan be reconsidered,** including how this layer of analysis may conflict with draft policy 9.5.2b) as it relates to the town’s intention to pre-zone lands to support intensification and expedite housing growth; and
- Policy 25.5.7 a) states “The Town will require a comprehensive landowner group agreement that sets out the financial requirements for growth-related infrastructure and community services among participating landowners.” **In our submission, we suggest “where required” be added to the beginning in order to provide clarity.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Rock Developments (via email)

VIA EMAIL

September 29, 2023

Town of Caledon  
Att: Steve Burke, Manager of Strategic Policy Planning  
6311 Old Church Road  
Caledon ON L7C 1J6

Dear Mr. Burke:

**Re: Submission Letter for 0 King Street, 13857 Airport Road and 13869 Airport Road  
Official Plan Review Phase 1**

**Request to**

- (a) remove Policy 23.4.4 from the draft Official Plan;**
- (b) remove lands from Future Strategic Employment Reserve Area; and**
- (c) include 0 King Street into Sandhill Industrial Hamlet.**

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I am the land-use planning consultant retained by 2733349 Ontario Inc., the owner of the lands legally described as Part of Lot 10, Concession 1, in the Town of Caledon, and known municipally as 0 King Street. I am also retained by 2762127 Ontario Inc., the owner of the lands legally described as Parts of Lot 10, Concession 1, in the Town of Caledon, and known municipally as 13857 Airport Road. Plus, I am retained by 2864966 Ontario Inc., the owner of the lands legally described as Parts of Lot 10, Concession 1, in the Town of Caledon, and known municipally as 13869 Airport Road.

I am submitting this Letter with respect to the Caledon Official Plan Review to request a removal of Policy 23.4.4 from the draft Official Plan, a removal of all three properties from the Future Strategic Employment Reserve Area as shown on Schedule B2, and an inclusion of the property at 0 King Street within the Sandhill Industrial Hamlet boundary.

The *Hazel McCallion Act (Peel Dissolution), 2023*, dissolves Peel Region as of January 1, 2025. However, Policy 23.4.4 of the draft Official Plan states that

The Regional Urban Boundary may only be expanded to include Future Strategic Employment Reserve Areas only through a Region of Peel Official Plan Amendment and municipal comprehensive review initiated by the Region.

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**Contact:**

Barbir & Associates Planning Consultants Ltd.  
345 Melrose Street  
Etobicoke, ON M8Z 1G9

**Phone:**

**Email:**

**Web:**

[dbarbir@barbirandassociates.com](mailto:dbarbir@barbirandassociates.com)

[www.barbirandassociates.com](http://www.barbirandassociates.com)

page 1 of 3

(416) 571-8826

B247

Since the Region will no longer exist in just over a year, the Regional MCR (municipal comprehensive review) will never happen, and the subject lands will be in limbo as a result. Moreover, it makes no sense for the proposed OP to create conditions that will be impossible to fulfil due to the dissolution of Peel Region.

### **Description of the Subject Properties**

The lands at 0 King Street front the south side of King Street, between Airport Road and Innis Lake Road. The lands are adjacent to and immediately to the east of the Industrial Hamlet of Sandhill. The lands have an irregular shape and are approximately 14.6 ha in size. The frontage along King Street is approximately 123 meters, and the depth is approximately 575 meters.

The properties at 13857 Airport Road and 13869 Airport Road are part of the Industrial Hamlet of Sandhill. They are rectangular in shape and have an area of 0.4 ha each. The frontage for both properties along Airport Road is 91.44 meters, and the depth is 89 meters. The Property is located close to major regional roads and provincial highways and the proposed Highway 413.

### **Current Land-Use Designations**

1. In the Region of Peel Official Plan, the Subject Lands are shown as “Rural System” (Schedule E-1 – Regional Structure).  
  
The Lands are strategically located close to major regional roads and provincial highways (Schedule E – Major Road Network), and the proposed Highway 413 route.
2. In the Town of Caledon Official Plan,
  - (a) the Subject Lands are designated as “Prime Agricultural Area” (Schedule A – Land Use Plan);
  - (b) the Subject Lands are adjacent to the Industrial Hamlet of Sandhill, which is designated as an “Industrial Commercial Centre” (Schedule A1 – Town Structure); and
  - (c) the site is conveniently located close to major roads and highways (Schedule J – Long Range Road Network).
3. In the Sandhill Secondary Official Plan, the two properties along Airport Road are designated “Dry Industrial” (Schedule T – Sandhill Land Use Plan).

### **Current Zoning**

The 0 King Street property is zoned A1 – Agricultural in the Town of Caledon Zoning By-Law 2006–50. The Airport Road properties are zoned MU-526, which permits a variety of employment uses on the properties.

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#### **Contact:**

Barbir & Associates Planning Consultants Ltd.  
345 Melrose Street  
Etobicoke, ON M8Z 1G9

Phone: (416) 571-8826  
Email: [dbarbir@barbirandassociates.com](mailto:dbarbir@barbirandassociates.com)  
Web: [www.barbirandassociates.com](http://www.barbirandassociates.com)



## Request

Following a brief review of the proposed materials, studies, and maps, we submit that

- (a) Policy 23.4.4 be removed from the draft Official Plan;
- (b) the subject properties be removed from the Future Strategic Employment Reserve Area; and
- (c) the property at 0 King Street be included within the boundaries of the Industrial Hamlet of Sandhill.

Policy 23.4.4 of the draft Official Plan should be removed because the Region of Peel will not exist beyond January 1, 2025, so it will be impossible for the conditions set out in the Policy to be fulfilled, since a Regional MCR was completed last year, and generally happens every ten years. Even if a new Regional MCR were now initiated, it could not reasonably be completed before the Region's dissolution. If the Policy remains in the OP, its wording will become ambiguous—perhaps even meaningless—after January 1, 2025, and will create enormous difficulties for the landowners of the subject properties.

Should you have any questions or require any additional information, please do not hesitate to contact me.

Regards,

Draga Barbir, M.Sc. M.Arch. MCIP RPP

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### Contact:

Barbir & Associates Planning Consultants Ltd.  
345 Melrose Street  
Etobicoke, ON M8Z 1G9

Phone: (416) 571-8826  
Email: [dbarbir@barbirandassociates.com](mailto:dbarbir@barbirandassociates.com)  
Web: [www.barbirandassociates.com](http://www.barbirandassociates.com)

page 3 of 3

B249



Friday, September 29, 2023

**The Corporation of the Town of Caledon**  
6311 Old Church Rd,  
Caledon East  
ON. L7C1J6

<b>Attention:</b>	<b>Steve Burke, Manager Strategic Policy Planning</b>
<b>Re:</b>	<b>Future Caledon Official Plan August 2023 Draft - Formal Comments</b> Muzzo Group of Companies 14747 The Gore Road and 14297 Mount Hope Road

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Dear Mr. Burke,

On behalf of the Muzzo Group of Companies (the “Owner”), Corbett Land Strategies Inc. (CLS) is pleased to provide formal comments on the Future Caledon Official Plan August 2023 Draft. We reviewed the proposed policies and drafted schedules in relation to the following land holdings:

1. 14695 The Gore Road: East Side of the Gore Road and South of Castlederg Side Road.
2. 14297 Mount Hope Road: East Side of Mount Hope Road and South of Castlederg Side Road.

In reviewing the proposed policies and schedules for the Town of Caledon, we are pleased to know the overall direction on managing growth and change to 2051. Specifically, the Town is forecast to grow to a population of approximately 80,000 residents in 2021 to 300,000 residents in 2051, and employment is forecast to rise from approximately 32,000 jobs to 125,000 jobs. The Town intends to focus this growth within the urban system, delineated built-up areas, strategic growth areas, and locations with existing or planned transit and public service facilities.

As the Town of Caledon continues to refine its proposed policies and establish clear direction on how to manage growth, the following are comments on the proposed policies as it relates to the development potential of the above-mentioned land holdings.

## 1. Managing Growth and Change

We have examined the drafted schedules and we identified that the two (2) properties are within the Regional Urban Boundary, within the “New Urban Area 2051” and within the “Designated Greenfield Area” as per Schedule B2. The properties are both designated as “New Community Area” and have recognized to have portions of lands with natural features.

The draft Official Plan describes that development and redevelopment within the Urban System will proceed according to the growth management and phasing policies of the Region of Peel’s Official Plan, planned servicing and the Town’s Growth Management and Phasing Plan. How will the Town of Caledon manage its growth, recognizing that in May 2023, the Province announced the dissolution of the Region of Peel making the Town of Caledon an independent single-tier municipality effectively on January 1, 2025.

It is known that the Region of Peel have a list of shared services which includes paramedic services, health programs, long-term care and services for seniors, child-care support, garbage collection and recycling, water and water treatment, road maintenance, as well as housing and shelter all of which contribute to creating a complete community in the Town of Caledon. It is likely that with the dissolution of the Region of Peel each municipality are required to create the infrastructure to offer the services, and this could be a timely and costly process. Given the uncertainty of the financial ramifications caused by the dissolution of the Region of Peel, we have the following questions:

- a) What is the Town of Caledon’s timeline of the Growth Management and Phasing Plan?
- b) If the development of the “New Urban Area 2051” is dependent on the planned servicing and the growth management and phasing policies of the Region of Peel’s Official Plan, is there a transition strategy once the Town of Caledon becomes a single-tier municipality?
- c) Does the Town of Caledon have an expedited plan to when the secondary planning process for New Urban Area 2051 will commence?
- d) It is evident in the draft that the Town will work with the Region of Peel to achieve its planning objectives, given that the region may no longer exist by 2025, what is the Town’s strategy to achieving its Official Plan’s planning objectives as a single-tier municipality?

## 2. Housing

Housing is one of the important components of growth. To accommodate for the forecasted growth, the Town of Caledon must provide housing opportunities that will cater to the needs of the current and future residents of the Town of Caledon. The draft Official Plan states that the Town is forecast to accommodate 90,000 new residential units. As described in the draft Official Plan, developments within the 2051 New Urban Area are only permitted once an approved Secondary Plan is established. Furthermore, the draft Official Plan states that secondary plans will assist to achieve, missing middle housing, rental housing supply, new residential units, and affordable and attainable housing. Secondary planning process is a timely and costly process, and the Town will need funding to establish public infrastructure, services and programming required to carry out future residential developments. This means that until no approved secondary plans in the New Urban Area, residential developments within Caledon will be within the delineated built-up area.

Given the above, we have the following questions:

- a) How will the Town of Caledon plan to achieve new housing targets if secondary plan process will be primarily initiated by the Town of Caledon?
- b) Given that the by year 2025 the Town will be a single-tier municipality. Is there a plan to expedite the secondary planning process to achieve the new housing targets?
- c) How will the Town plan to provide the required public infrastructures and other services for future residential development?

### 3. Urban System

As established in the draft Official Plan, majority of growth will occur within the urban system including lands designated as “Community Areas” and new “Employment Areas”. The draft Official Plan provided a clear direction that the Town will only permit development in Community Areas and Employment Areas in accordance with approved secondary plans and privately initiated secondary plans will not be supported. Section 21.4.3 states,

*“Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.”*

The draft Official Plan describes that no secondary plans will be approved in the 2051 New Urban Area until after the structure of a connected transportation system is planned to the Region’s satisfaction. As established in this letter, how will the Town of Caledon approve secondary plans moving forward once the Region is dissolved? The disbanding of the Region will result in financial consequences that will impact planned and future growth in each municipality. Each municipality will be required to fund its own public infrastructures to service future developments and other services required to create a complete community. How will the Town of Caledon pursue its forecasted growth to 2051 as a single-tier municipality?

### 4. Secondary Planning Process

CLS understand the Town’s purpose on leading the secondary planning process, however, the Town will need to consider the financial implications and must establish a strong strategy on how to accommodate the forecasted population and employment growth to 2051 as a single-tier municipality. The secondary planning process will be a timely and costly process. For this reason, it is our opinion that this is an opportunity for the Town to allow landowners/developers to be a co-proponent with the Town of Caledon in initiating and completing the secondary planning process. Allowing the landowners/developers to be a co-proponent will assist Caledon in achieving its growth target including new housing units and achieve its planning objectives.

We believe that allowing landowners/developers to assist the Town of Caledon in the secondary planning process will amount to significant benefits. For instance, the Town can require the landowner/developer to advocate funding for the land use and infrastructure planning required for the growth area such as major



improvements of adjacent water or sewer pipes or road layout. Conducting a Class EA can be costly and time consuming, this cost can be directed to the landowners/developers resulting in a cost and time efficient approach. Lastly, through an integration of planning approvals under the EA Act and the Planning Act, where decisions are made on infrastructure and land use planning simultaneously, this will create an opportunity for Town of Caledon to achieve its forecasted growth to 2051 in a more efficient manner.

#### Preliminary Servicing Investigation by SCS

As expressed in our previous submissions, we intend to work with the Town to assist Caledon in achieving its growth targets by determining the sequence of growth areas within the 2051 New Urban Area. As such, we retained SCS to provide a high-level assessment of the servicing opportunities in Caledon which captures the above noted lands and two (2) other properties municipally known as 5450 Mayfield Road and 12729 Torbram Road. The preliminary investigation determines the sequence of growth in the Town of Caledon.

- *Storm Servicing and Stormwater Management*

The four (4) properties are located within the TRCA Humber River watershed and are subject to the TRCA stormwater Management Guidelines for the Humber River. Further coordination will be required at the time of development.

- *Sanitary Servicing*

In accordance with the 2020 Water and Wastewater Master Plan for the Lake-Based System, The G.E. Booth Wastewater Treatment Plant does not have capacity to accommodate the projected 2041 growth. However, the Clarkson Wastewater Treatment Plan does have adequate capacity to accommodate to meet the projected 2041 growth. To support the future growth demand, expansions are planned for both wastewater treatment plants. In addition, an east-to-west diversion trunk sewer is planned on Derry Road to divert the sanitary flows originally draining to G.E. Booth plant to Clarkson Plant, to balance the flows between the two treatment plants.

#### 5450 Mayfield Road

- ST-012: A new 525 mm diameter sanitary sewer within a future road south of Mayfield Road, from Torbram Road to Mayfield Road, scheduled to be in service by 2022. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$1,630,000.
- ST-208: A new 450 mm diameter sanitary sewer running westerly on Mayfield Road, northerly on Bramalea Road, and then northwesterly under a future road. This new sewer is scheduled to be in service by 2031. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$2,885,000.

#### 12729 Torbram Road

- ST-178: A new 600 mm diameter sanitary sewer running southerly under a new road, from the subject property to Mayfield Road. This new sewer is scheduled to be in service by 2036. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$7,570,000.

14695 The Gore Road

- There are no wastewater servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy.

14297 Mount Hope Road

- There are no wastewater servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy.

- Water Servicing

According to the Peel Region Master Servicing Report, the A.P. Kennedy and Lorne Park Water Treatment plants within the Region have adequate capacity to meet the projected 2041 growth.

5450 Mayfield Road

- ST-012: A new 525 mm diameter sanitary sewer within a future road south of Mayfield Road, from Torbram Road to Mayfield Road, scheduled to be in service by 2022. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$1,630,000.
- ST-208: A new 450 mm diameter sanitary sewer running westerly on Mayfield Road, northerly on Bramalea Road, and then northwesterly under a future road. This new sewer is scheduled to be in service by 2031. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$2,885,000.

12729 Torbram Road

- ST-178: A new 600 mm diameter sanitary sewer running southerly under a new road, from the subject property to Mayfield Road. This new sewer is scheduled to be in service by 2036. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$7,570,000.

14695 The Gore Road

- There are no water servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy.

14297 Mount Hope Road

- There are no water servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy.

As presented in the preliminary investigation, there are fiscal responsibility that needs to be met to provide full service to the 2051 New Urban Area. We hope that the above assessment will encourage the Town of Caledon to strongly consider allowing for a landowner/developer partnership to initiate secondary planning process and assist the Town to achieve its visions as set in their Draft Future Caledon Official Plan (2023). As has been witnessed in other jurisdictions, secondary plans which have either been privately initiated or receive direct private involvement has resulted in efficient and equitable communities. This type of planning will contribute to the delivery of housing commitments and the ability to expeditiously create the much-needed housing supply.

Conclusion

Overall, it is our opinion that there are great financial and time benefits to allowing landowners/developers to be a co-proponent with the Town of Caledon in the secondary planning process. Therefore, we respectfully request that the Town of Caledon reconsider their direction on how to accommodate growth through secondary planning process by adding the following into the draft policies:

1. To allow landowners/developers to be a co-proponent with the Town of Caledon to initiate and complete secondary planning process for the 2051 New Urban Area.
2. For Secondary Plans undertaken by landowner/developer, an integrated approach of the planning approvals under the EA Act and the Planning Act be permitted to streamline planning and approvals processes where decisions are made on infrastructure and land use planning simultaneously.

On behalf of the client, it is our intention to work closely with the Town of Caledon through extensive collaboration on the planning and approach of the proposed growth areas. Please do not hesitate to contact the undersigned should you have any questions or require anything further.

Sincerely,

*John Corbett*

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John B. Corbett, M.C.I.P., R.P.P.  
Corbett Land Strategies Inc.  
President  
[john@corbettlandstrategies.ca](mailto:john@corbettlandstrategies.ca)

Schedule A – Location Map  
Schedule B – Preliminary Servicing Investigation by SCS

File #: 2343  
Date: October 14, 2021

**Mr. Barry Stern**

The Muzzo Group of Companies  
50 Confederation Parkway  
Concord, Ontario, L4K 4T8

Dear Mr. Stern:

Re: Existing Servicing Investigation  
Caledon Farms  
Town of Caledon

The purpose of this servicing brief is to provide a high-level assessment of the servicing opportunities for the proposed re-developments of four properties located at 5450 Mayfield Road, 12729 Torbram Road, 14695 The Gore Road, and 14297 Mount Hope Road, all located within the Town of Caledon.

The following documents were referenced for the purpose of this study:

- 2020 Water and Wastewater Master Plan for the Lake-Based System, Region of Peel, prepared by GM Blue Plan.
- Stormwater Management Criteria, Toronto and Region Conservation Authority, dated August 2012.

**General Site Descriptions**

The property located at 5450 Mayfield Road is approximately 39.5 ha in size, and it is bordered by Mayfield Road to the south, Torbram Road to the east, and vacant lands to the north and west. According to **Figure 1: TRCA Humber River Quantity Control Release Rates**, a tributary of the Humber River is located within the subject site.

The property located at 12729 Torbram Road is approximately 40.5 ha in size, and it is bordered by Torbram Road to the west, and vacant lands to the north, south, and east. According to **Figure 1: TRCA Humber River Quantity Control Release Rates**, a tributary of the Humber River is located near the north-east corner of the subject site.

The property located at 14695 The Gore Road is approximately 57.0 ha in size, and it is bordered by The Gore Road to the west, and vacant lands to the north, south, and east. According to **Figure 1: TRCA Humber River Quantity Control Release Rates**, a tributary of the Humber River is located near the eastern limit of the subject site.

The property located at 14297 Mount Hope Road is approximately 203.0 ha in size, and it is bordered by Castlederg Side Road to the north, Mount Hope Road to the west, Mount Pleasant Road to the east, and vacant lands to the south. According to **Figure 1: TRCA Humber River Quantity Control Release Rates**, a tributary of the Humber River runs through the subject site.

Re: Existing Servicing Investigation  
Caledon Farms  
Town of Caledon

File #: 2343  
October 14, 2021  
Page 2 of 5

According to **Figure 2: Peel Region Greenbelt Plan**, there are natural heritage areas located within 5450 Mayfield Road and 14297 Mount Hope Road. A portion of 14297 Mount Hope Road is also located within the Oak Ridges Moraine.

According to **Figure 3: Peel Region Land Use Map**, all four properties are all designated as Rural land in the growth plan.

### **Storm Servicing and Stormwater Management**

All 4 subject properties are located within the TRCA Humber River watershed and therefore are subject to the TRCA Stormwater Management guideline for the Humber River. We note that the need for Regional Storm control is being evaluated by TRCA for all watersheds and can be anticipated to be required for these properties. Further coordination with TRCA will be required at the time of development.

#### **5450 Mayfield Road**

As per TRCA Humber River Tributary Mapping (see attached **Figure 1**), the subject property is located in subbasin 4 of the Humber River watershed. The subject property is required to control the post-development storm flow for all storm events, in accordance with unit release rate for subbasin 4. For erosion control, the subject property is required to provide extended detention for 25 mm storm event for a period of 48 hours. For stormwater quantity control, the subject property is required to achieve an Enhanced Level of protection per MOECP guidelines (80% TSS Removal).

#### **12729 Torbram Road**

As per TRCA Humber River Tributary Mapping (see attached **Figure 1**), the subject property is located in subbasin 4 of the Humber River watershed. The subject property is required to control the post-development storm flow for all storm events, in accordance with unit release rate for subbasin 4. For erosion control, the subject property is required to provide extended detention for 25 mm storm event for a period of 48 hours. For stormwater quantity control, the subject property is required to achieve an Enhanced Level of protection per MOECP guidelines (80% TSS Removal).

#### **14695 The Gore Road**

As per TRCA Humber River Tributary Mapping (see attached **Figure 1**), the majority of the subject property is located in Upper Humber Rive Branch and stormwater quantity control is not required. A smaller are in the northern portion of the property appear to be within subbasin 10 of the Humber River watershed. This portion of the subject property is required to control the post-development storm flow for all storm events, in accordance with unit release rate for subbasin 10. For erosion control, the subject property is required to provide extended detention for 25 mm storm event for a period of 48 hours. For stormwater quantity control, the subject property is required to achieve an Enhanced Level of protection per MOECP guidelines (80% TSS Removal).

#### **14297 Mount Hope Road**



Re: Existing Servicing Investigation  
Caledon Farms  
Town of Caledon

File #: 2343  
October 14, 2021  
Page 3 of 5

As per TRCA Humber River Tributary Mapping (see attached **Figure 1**), the subject property is located in subbasin 10 of the Humber River watershed. The subject property is required to control the post-development storm flow for all storm events, in accordance with unit release rate for subbasin 10. For erosion control, the subject property is required to provide extended detention for 25 mm storm event for a period of 48 hours. For stormwater quantity control, the subject property is required to achieve an Enhanced Level of protection per MOECP guidelines (80% TSS Removal).

Per section 3.2.3.2 of the Caledon Development Standards, Policies, and Guidelines, the internal storm sewer system shall be designed for the 10-year post development storm event where foundation drains are to be connected, and for the 5-year post development storm event where foundation drains are not connected.

### **Sanitary Servicing**

According to the 2020 Water and Wastewater Master Plan for the Lake-Based System (attached **Figure 4: Preferred Wastewater Servicing Strategy for the Lake Based System**), the following Regional wastewater servicing works are planned in the vicinity of the subject properties:

#### **5450 Mayfield Road**

- ST-012: A new 525 mm diameter sanitary sewer within a future road south of Mayfield Road, from Torbram Road to Mayfield Road, scheduled to be in service by 2022. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$1,630,000.
- ST-208: A new 450 mm diameter sanitary sewer running westerly on Mayfield Road, northerly on Bramalea Road, and then northwesterly under a future road. This new sewer is scheduled to be in service by 2031. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$2,885,000.

#### **12729 Torbram Road**

- ST-178: A new 600 mm diameter sanitary sewer running southerly under a new road, from the subject property to Mayfield Road. This new sewer is scheduled to be in service by 2036. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$7,570,000.

#### **14695 The Gore Road**

- There are no wastewater servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy as outlined in **Figure 5: Post 2041 Wastewater Servicing Strategy**.

#### **14297 Mount Hope Road**

- There are no wastewater servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy as outlined in **Figure 5: Post 2041 Wastewater Servicing Strategy**.

Re: Existing Servicing Investigation  
Caledon Farms  
Town of Caledon

File #: 2343  
October 14, 2021  
Page 4 of 5

According to the Peel Region Master Servicing Report, The G.E. Booth Wastewater Treatment Plant does not have capacity to accommodate the projected 2041 growth. However, the Clarkson Wastewater Treatment Plant does have adequate capacity to accommodate to meet the projected 2041 growth. In order to support the future growth demand, expansions are planned for both wastewater treatment plants. In addition, an East-to-West diversion trunk sewer is planned on Derry Road to divert the sanitary flows originally draining to G.E. Booth plant to Clarkson Plant, in order to balance the flows between the two treatment plants.

The internal sanitary sewer system shall be designed in accordance with the Region of Peel guidelines, including but not limited to the following:

- ➡ Residential Sanitary Generation Rate: 303 L/cap/d
- ➡ Population Density: 50 people/ha (single family with greater than 10m frontage)
- ➡ Population Density: 70 people/ha (single family with less than 10m frontage)
- ➡ Population Density: 70 people/ha (Semi Detached)
- ➡ Population Density: 175 people/ha (Townhouse)
- ➡ Population Density: 475 people/ha (Apartment)
- ➡ Peaking Factors: Per Harmon Peaking Equation
- ➡ Infiltration Rate: 0.20 L/s/ha
- ➡ Minimum Pipe Size: 200 mm

### **Water Servicing**

According to the 2020 Water and Wastewater Master Plan for the Lake-Based System (attached **Figure 6: Preferred Water Servicing Strategy for the Lake Based System**), the following water servicing works are planned in the vicinity of the subject properties:

#### **5450 Mayfield Road**

- The subject property is located in Peel Region Water Pressure Zone #6.
- ST-113: A new 900 mm diameter sub-transmission line on Mayfield Road, from Innis Lake Road to the North Brampton Reservoir. This new watermain is scheduled to be in service by 2037.
- D-180: A new 400 mm diameter watermain on Torbram Road, from Mayfield Road to a new road further north. This new watermain is scheduled to be in service by 2036. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$3,165,000.
- A future Reservoir (Victoria Reservoir) is planned to be operational in 2026 to provide water service for the area. This work is listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$60,000,000.

#### **12729 Torbram Road**

- The subject property is located in Peel Region Water Pressure Zone #6.
- D-181: A new 400 mm diameter watermain on a new road located south of the subject property, from Torbram Road to Airport Road. This watermain is scheduled to be in service by 2036. This work is

Re: Existing Servicing Investigation  
Caledon Farms  
Town of Caledon

File #: 2343  
October 14, 2021  
Page 5 of 5

listed in the 2020 Peel Region Development Charge Background Study, with an estimated cost of \$1,730,000.

#### 14695 The Gore Road

- There are no water servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy as outlined in **Figure 7: Post 2041 Water Servicing Strategy**.

#### 14297 Mount Hope Road

- There are no water servicing works proposed near the subject property.
- The subject property is part of the potential post 2041 servicing strategy as outlined in **Figure 7: Post 2041 Water Servicing Strategy**.

According to the Peel Region Master Servicing Report, the A.P. Kennedy and Lorne Park Water Treatment plants within the Region have adequate capacity to meet the projected 2041 growth.

The internal watermain system shall be designed in accordance with the Region of Peel guidelines, including but not limited to the following:

- ➡ Residential Consumption Rate: 280 L/cap/d
- ➡ Max Day Factor: 2.0
- ➡ Peak Hour Factor: 3.0
- ➡ Minimum Operation Pressure: 40 psi
- ➡ Maximum Operation Pressure: 100 psi
- ➡ Minimum Pipe Size: 150 mm

Sincerely,

**SCS Consulting Group Ltd.**



**Peter Chen, P. Eng**

pchen@scsconsultinggroup.com

Attachments: Figure 1: Humber River Stormwater Management Quantity Control Release Rates Figure  
Figure 2: Peel Region Greenbelt Plan  
Figure 3: Peel Region Land Use Map  
Figure 4: Preferred Wastewater Servicing Strategy for the Lake Based System  
Figure 5: Post 2041 Wastewater Servicing Strategy  
Figure 6: Preferred Water Servicing Strategy for the Lake Based System  
Figure 7: Post 2041 Water Servicing Strategy

# SCHEDULE A - SUBJECT PROPERTIES



TOWN OF CALEDON  
OFFICIAL PLAN

Schedule **B2**

Growth Management

- Urban Centre
- Neighbourhood Centre
- Urban Corridor
- Knowledge and Innovation Corridor
- Agricultural Area and Rural Lands
- Rural Settlement Area
- Rural Employment Centre
- Delineated Built-up Area
- Designated Greenfield Area
- Regional Urban Boundary
- New Urban Area 2051
- Delineated Built Boundary
- Future Strategic Employment Reserve
- Provincially Significant Employment Zone

## Other Features

- Highway 413 Transportation Corridor

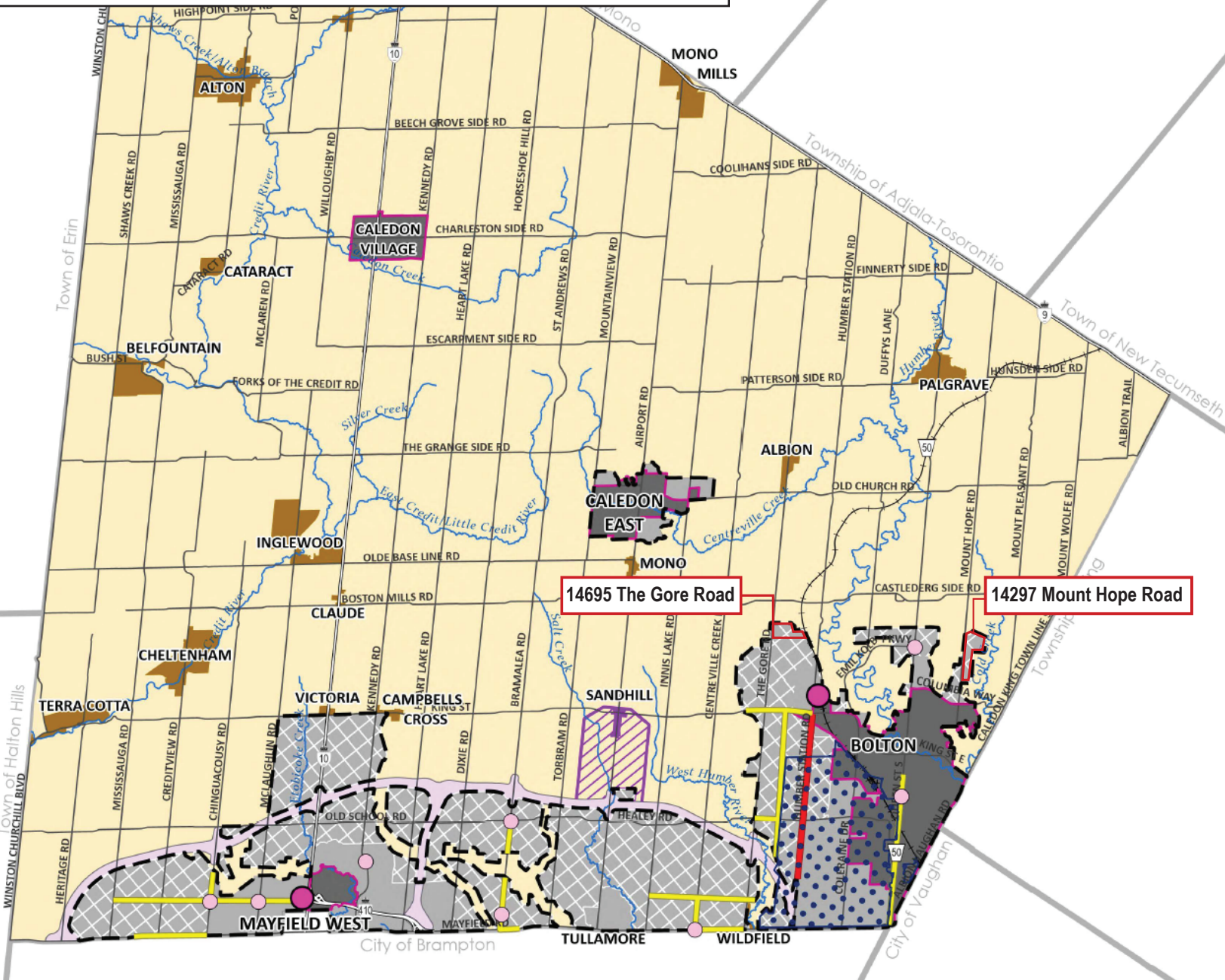


0 1 2 3 4 5 km

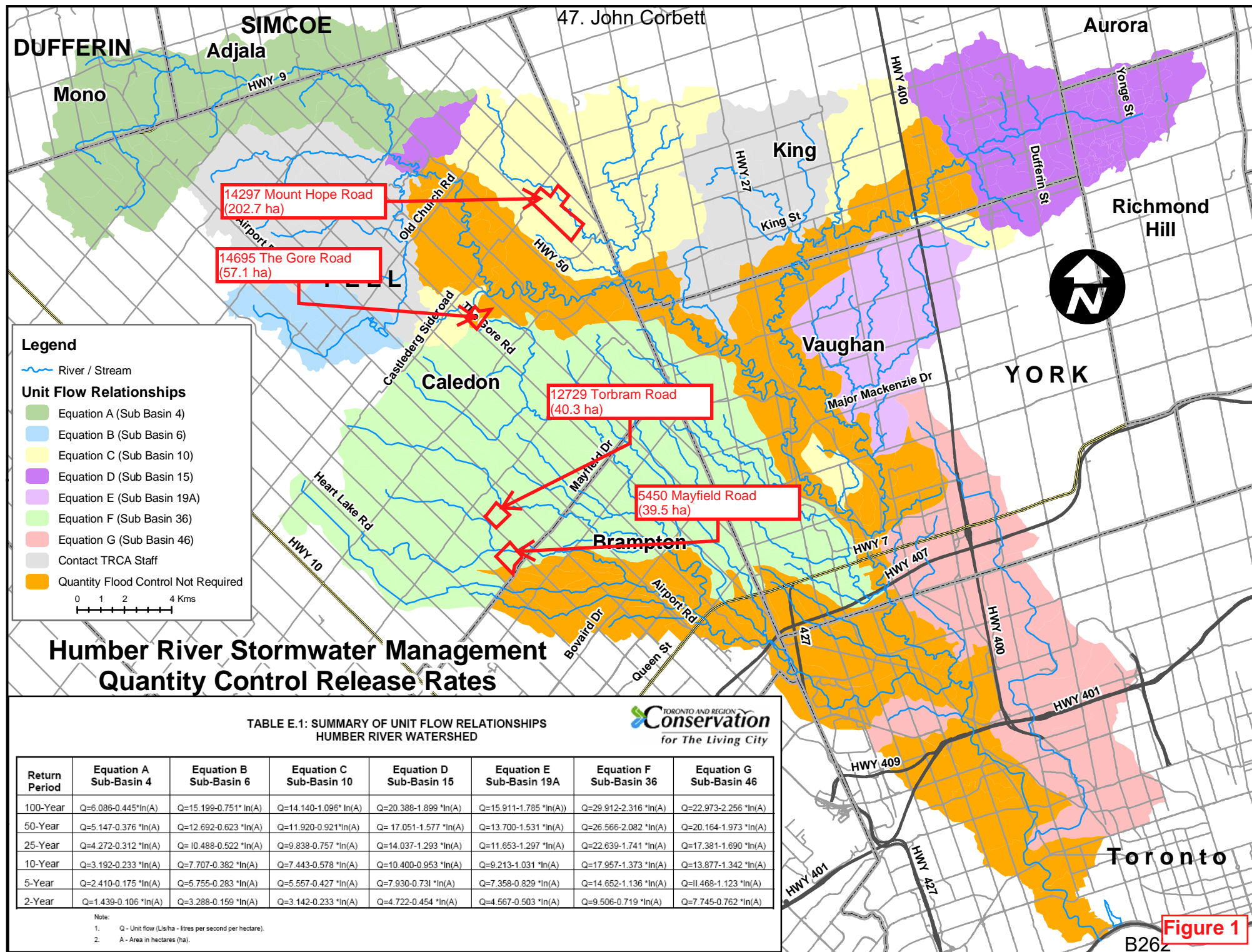
Date of print: 8/24/2023 August 2023  
Sources: Town of Caledon, City of Vaughan, Municipality of Peel  
Contains information released under the Open Government Licence – Ontario

This map forms part of the Official Plan of the Town of Caledon and must be read in conjunction with the text, other schedules and secondary plans. The boundaries/alignments of designations on this schedule are approximate and are not intended to be scaled.

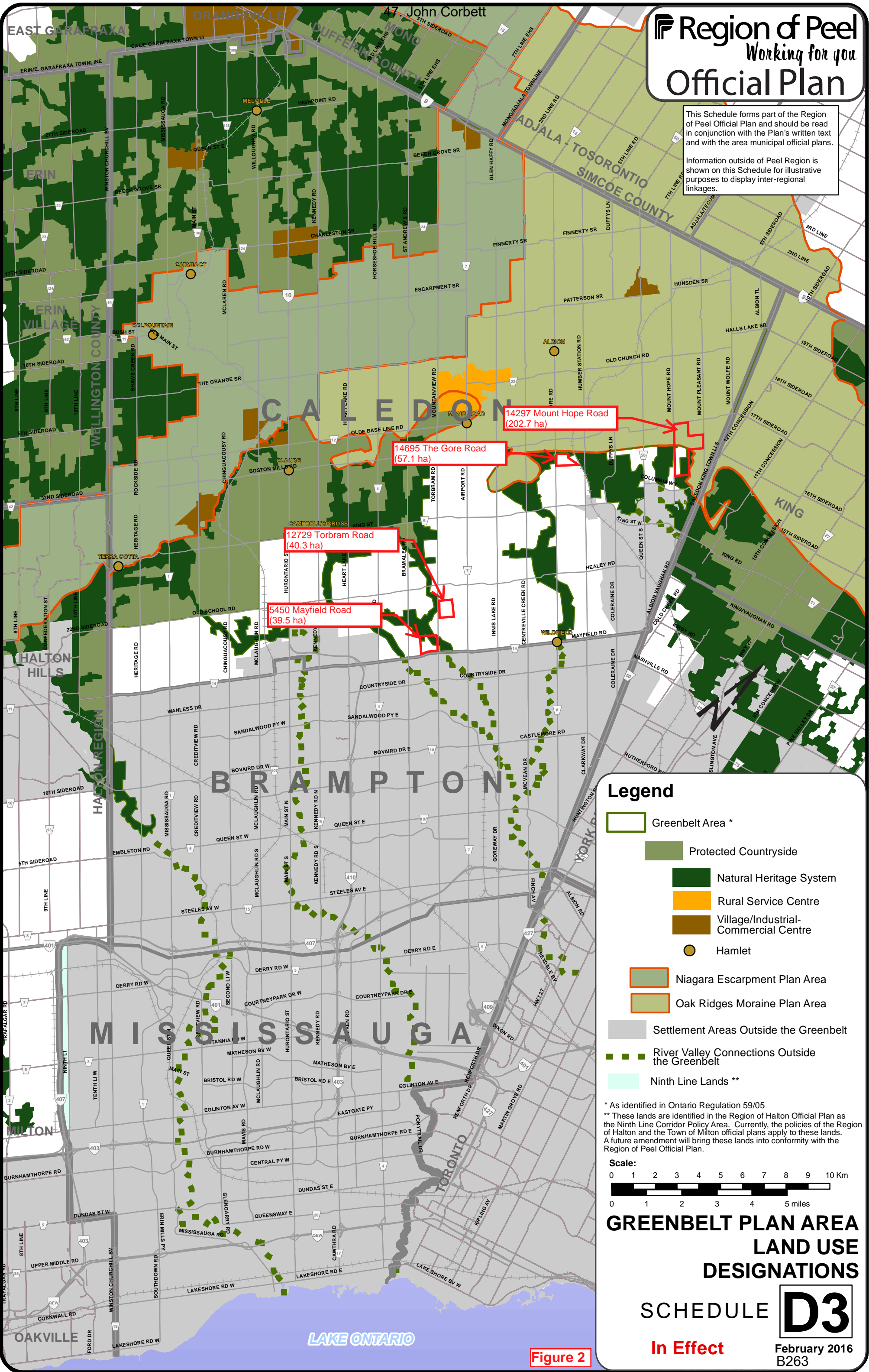
B250











This Schedule forms part of the Region of Peel Official Plan and should be read in conjunction with the Plan's written text and with the area municipal official plans.

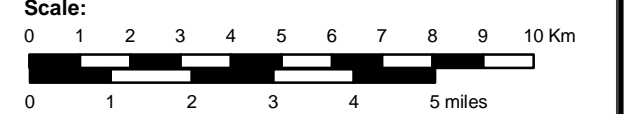
Information outside of Peel Region is shown on this Schedule for illustrative purposes to display inter-regional linkages.

**Legend**

- Greenbelt Area \*
- Protected Countryside
- Natural Heritage System
- Rural Service Centre
- Village/Industrial-Commercial Centre
- Hamlet
- Niagara Escarpment Plan Area
- Oak Ridges Moraine Plan Area
- Settlement Areas Outside the Greenbelt
- River Valley Connections Outside the Greenbelt
- Ninth Line Lands \*\*

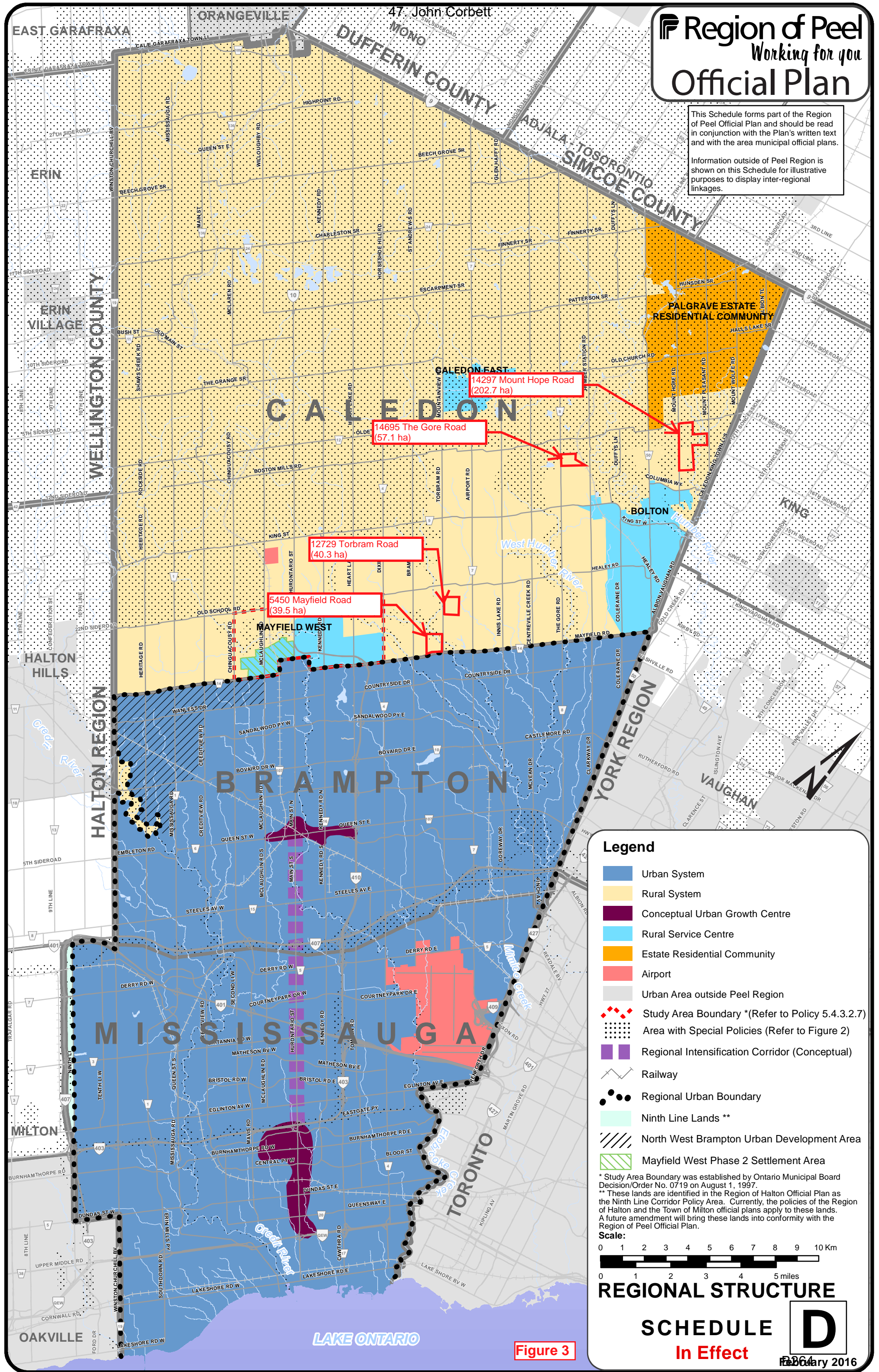
\* As identified in Ontario Regulation 59/05

\*\* These lands are identified in the Region of Halton Official Plan as the Ninth Line Corridor Policy Area. Currently, the policies of the Region of Halton and the Town of Milton official plans apply to these lands. A future amendment will bring these lands into conformity with the Region of Peel Official Plan.



**Figure 2**





This Schedule forms part of the Region of Peel Official Plan and should be read in conjunction with the Plan's written text and with the area municipal official plans.

Information outside of Peel Region is shown on this Schedule for illustrative purposes to display inter-regional linkages.

**Legend**

- Urban System
- Rural System
- Conceptual Urban Growth Centre
- Rural Service Centre
- Estate Residential Community
- Airport
- Urban Area outside Peel Region
- Study Area Boundary \*(Refer to Policy 5.4.3.2.7)
- Area with Special Policies (Refer to Figure 2)
- Regional Intensification Corridor (Conceptual)
- Railway
- Regional Urban Boundary
- Ninth Line Lands \*\*
- North West Brampton Urban Development Area
- Mayfield West Phase 2 Settlement Area

\* Study Area Boundary was established by Ontario Municipal Board Decision/Order No. 0719 on August 1, 1997.  
\*\* These lands are identified in the Region of Halton Official Plan as the Ninth Line Corridor Policy Area. Currently, the policies of the Region of Halton and the Town of Milton official plans apply to these lands. A future amendment will bring these lands into conformity with the Region of Peel Official Plan.

**Scale:**  
0 1 2 3 4 5 6 7 8 9 10 Km  
0 1 2 3 4 5 miles

**REGIONAL STRUCTURE**

**SCHEDULE**

**In Effect**

**D**

February 2016

**Figure 3**



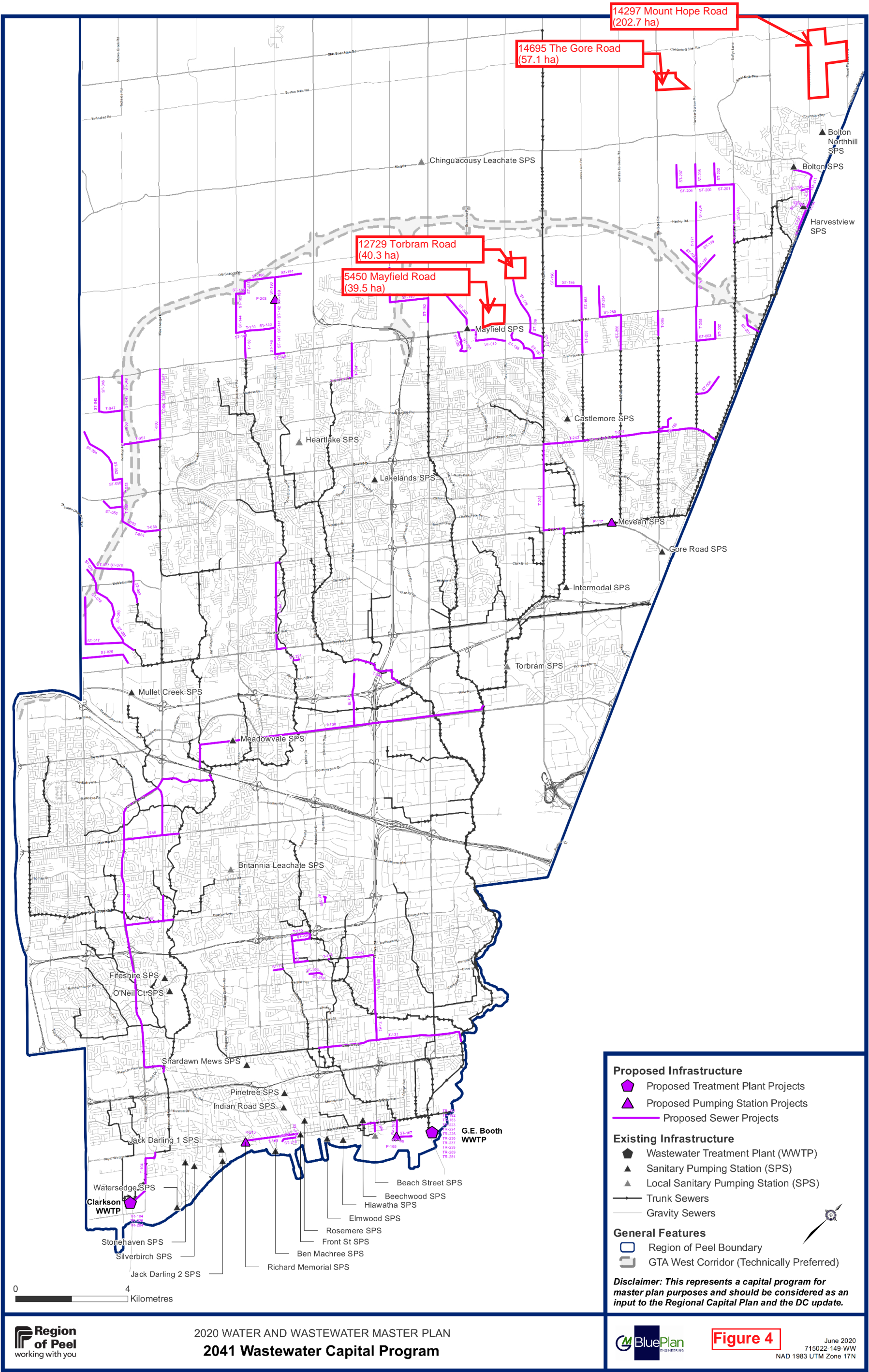
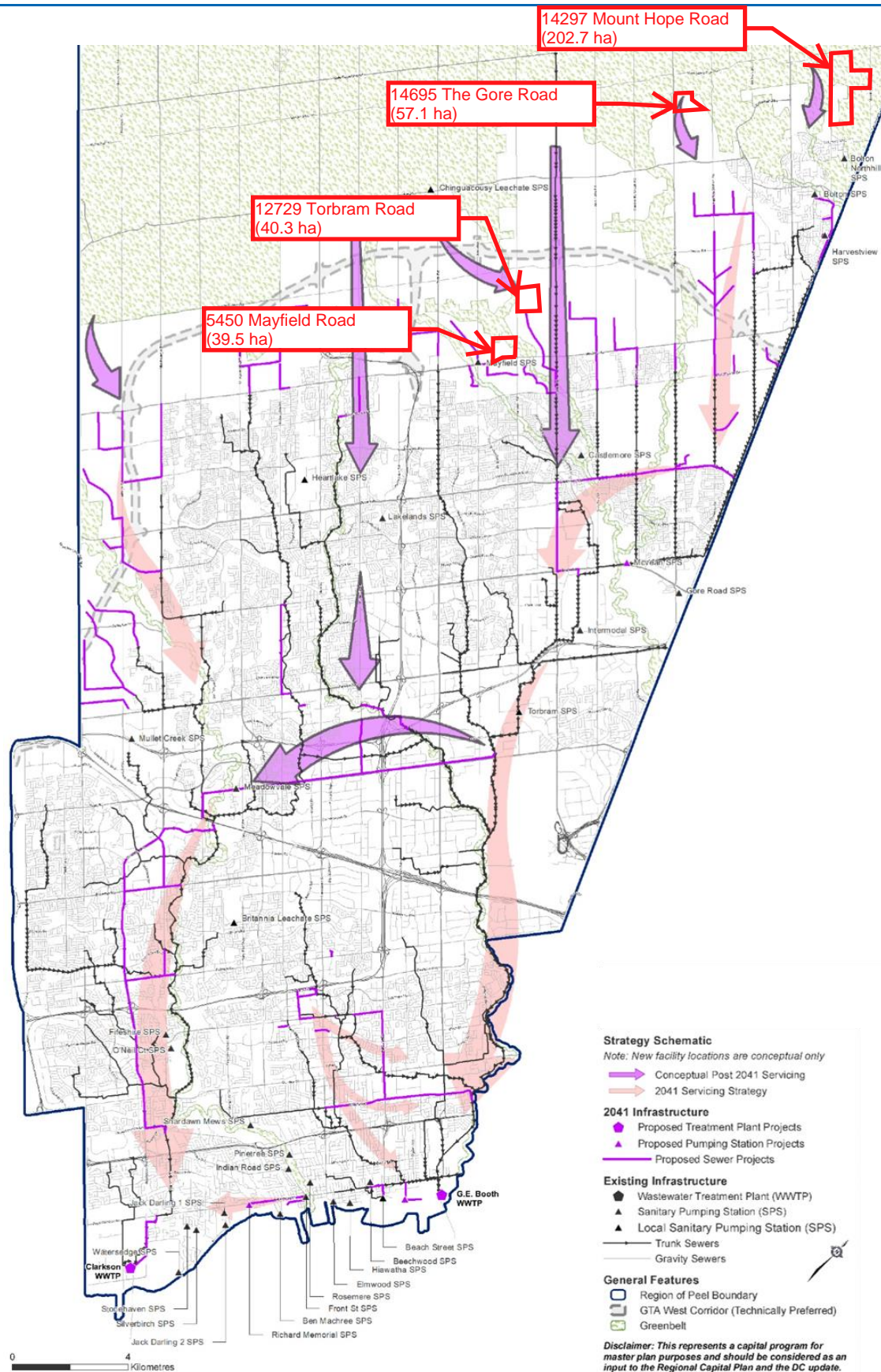


Figure 5 – Preferred wastewater servicing strategy for the lake-based system.





Note: High resolution image is available in Appendix 4H.

Figure 38 – Post-2041 wastewater servicing strategy.

Figure 5



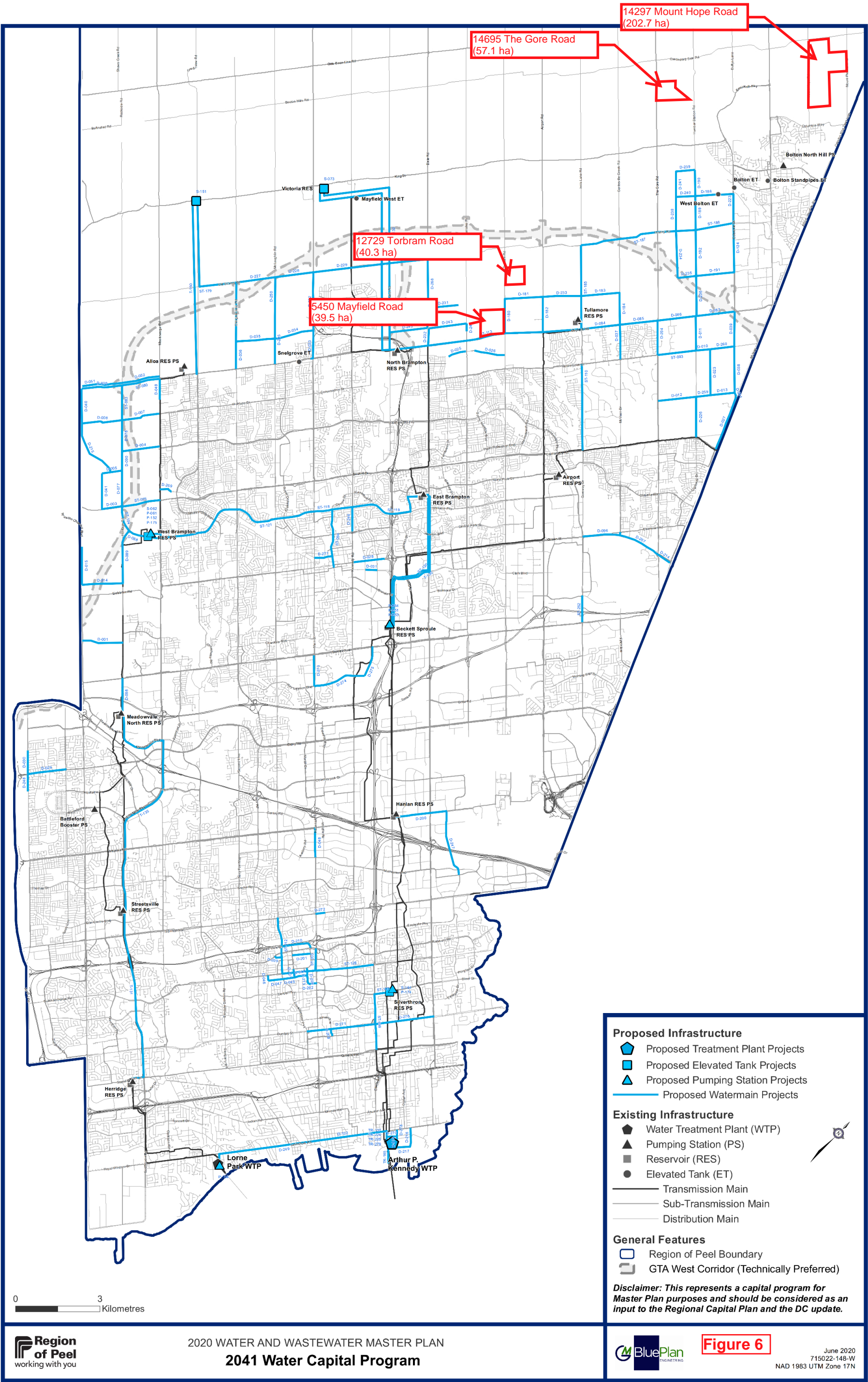


Figure 3 – Preferred water servicing strategy for the lake-based system.



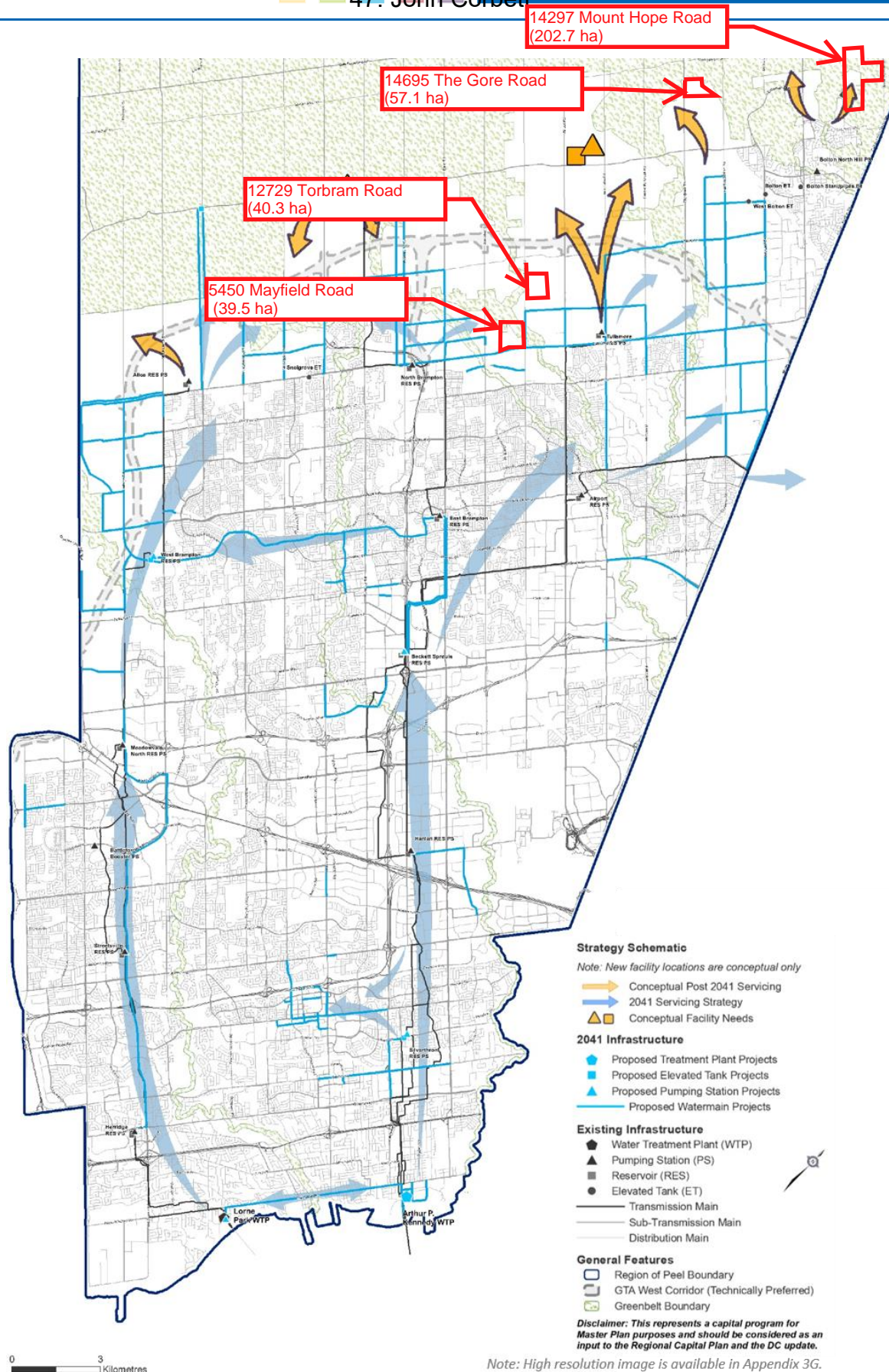


Figure 27 – Post-2041 water servicing strategy.

Figure 7



**VIA EMAIL**

September 29, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – August 2023 Draft  
Preliminary Comments on Behalf of BoltCol Holdings North Inc. and  
BoltCol Holdings South Inc.**

**Our File: BCL/BOL/22-01**

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We are the planning consultants for BoltCol Holdings North Inc. and BoltCol Holdings South Inc. ("BoltCol") for the Town of Caledon Official Plan Review. BoltCol are the owners of approximately 100 ha (249 ac) of lands within the Town of Caledon (the "BoltCol Lands"), including:

- 8399 George Bolton Parkway;
- 8400 George Bolton Parkway;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 12210 Coleraine Drive;
- 12226 Coleraine Drive;
- 12258 Coleraine Drive;
- 12300 Coleraine Drive;
- 12366 Coleraine Drive;
- 12400 Coleraine Drive;
- 12480 Coleraine Drive;
- 12490 Coleraine Drive;
- 12592 Coleraine Drive;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 8410 Mayfield Road; and
- 8424 Mayfield Road.

The BoltCol Lands are at various stages of approval for employment uses. With the completion of approvals for six buildings to the north and south of the extension of George Bolton Parkway, the focus has turned to the southern portion of the BoltCol Lands down to Mayfield Road, including the approximately 32.3 ha (79.8 ac) vacant portion of the BoltCol Lands, known as the “Boltcol Triangle Lands”, which were recently subject to the Town-initiated OPA 271 and the associated implementing zoning under By-law 2023-054, which are now both in full force and effect.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of BoltCol, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review, for which we submitted preliminary comments on July 31, 2023. The Town of Caledon released a third Draft Official Plan in August 2023 for public review. On behalf of BoltCol, we have preliminary comments as outlined below, and will continue to review the August 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the August 2023 Draft Official Plan:

- On Schedule B1 Town Structure, the BoltCol Lands are predominantly shown as Urban Area with portions shown as Natural Features and Areas. A portion of the lands fronting on Mayfield Road in the southwest corner is shown as Highway 413 Transportation Corridor;
- On Schedule B2 Growth Management, the BoltCol Lands are shown as Designated Greenfield Area, within the Provincially Significant Employment Zone. We note that there is no Highway 413 Transportation Corridor shown on in the southwest corner of the BoltCol Lands;
- On Schedule B4 Land Use Designations, the BoltCol Lands are shown as “Refer to 1976 Official Plan” with the exception of the portion of the lands fronting on Mayfield Road in the southwest corner is shown as Highway 413 Transportation Corridor;
- On Schedule C1 Town Wide Transportation Network, the BoltCol Lands are shown within the Settlement Area with an east-west Conceptual Collector Road extending west from George Bolton Parkway, along with a Conceptual Collector Road extending from Mayfield Road generally to the west of the BoltCol Lands, which we note is not shown as a “Conceptual Collector Road” on Schedule F1 Urban System but is shown as a “Proposed Collector Road” on Figure C3 2051 Town-Wide Transit Network;
- On Schedule C2 Road Right-of-Way Widths, Coleraine Drive is shown with a 36 m ROW (36 m ROW under current Official Plan), Mayfield Road is shown with a 50 m ROW (50 m ROW under current Official Plan) and George Bolton Parkway is shown as Local Road, whereby no changes are proposed;
- On Schedule D1 Natural Environment System, the BoltCol Lands are shown as “Refer to 1976 Official Plan”;
- On Schedule D2 Natural and Supporting Features and Areas, the BoltCol Lands are shown as “Refer to 1976 Official Plan”; and
- On Schedule D3 Water Resources System Areas, areas of Highly Vulnerable Aquifers are shown within portions of the BoltCol Lands.

For the comments below, please note that the references to “Formerly Policy” refers to the Policies under the June 2023 Draft Official Plan. At this time, our preliminary comments for the August 2023 Draft Official Plan are as follows:

- **We reiterate our general comments that we are concerned with the implications of the draft Official Plan policy framework for the BoltCol Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies;**
- **For the applicable Schedules, we request confirmation that the entirety of the BoltCol Lands, which are subject to OPA 271, are within the area shown as “Refer to 1976 Official Plan”, including the area shown as Highway 413 Transportation Corridor;**
- **We reiterate our general comment that the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that Part F be withheld from consideration, or that land use schedules be prepared;**
- **For Schedule C1 Town Wide Transportation Network, we request clarification that that the Collector Road extending from Mayfield Road is located to the west of the BoltCol Lands, which would correspond with OPA 271, where there are no Collector Roads planned south of the George Bolton Parkway extension through the BoltCol Lands;**
- **Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” We reiterate that in our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;**
- **Policy 7.2.3 states “All development in the Urban System will: ... b) adhere to the design policies in Part F, Urban System.” We request clarification as to what specific design policies are being referenced;**
- **Policy 7.2.4 states “New communities will: ... c) align new streets in a grid pattern to create pedestrian-scaled development blocks to ensure connectivity and better provide for active transportation”. We request clarification as to whether the grid pattern of pedestrian-scaled development blocks would be applicable**

- to employment uses, where large parcels are necessary to accommodate large scale employment uses;**
- Policy 7.3.13 (formerly Policy 7.5.3) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the BoltCol Lands);**
  - Policy 7.7.1 states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... e) on larger sites, use existing or create new publicly accessible mid-block pedestrian connections. Mid-block connections should be direct, logical, and continuous to limit the need for added wayfinding measures.” **In our submission, flexibility should be added to the policy by adding “where appropriate” before “use existing or create” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian connections. In addition, we request clarification as to the two similar policies 7.3.13 and 7.7.1 in terms of what is the difference between “pedestrian linkages” and “pedestrian connections”;**
  - Policy 7.8.6 states “Building servicing, as well as parking, access, loading, and waste collection areas, will be integrated into the building design, located away from sensitive land uses, and be separated and screened from the public realm.” **We note the similar Policy 7.7.1 that states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... c) ensure site servicing components are functional, attractive and appropriately screened from view from the public realm. Loading areas, utilities/mechanical equipment, should be located and integrated within a building. Where not feasible, these elements should be directed away and screened from the public realm” where there is flexibility. In our submission, similar flexibility should be added to Policy 7.8.6;**
  - Policy 7.10.7 states “Truck and/or trailer parking, staging or loading areas *will* [emphasis added] not be located between the front elevation of a building and a public street and will be screened from the public realm.” **In our submission, the first “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 12.7.2 (Formerly Policy 12.5.2) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We reiterate our comment that flexibility through encouragement language should be incorporated since amenity spaces are not appropriate under all circumstances and in particular for private SWM ponds that are associated with employment lands development;**



- Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We note our general comment above and reserve the opportunity to participate in the detailed review of the existing secondary plans;**
- Policy 21.4.1 (formerly Policy 4.5.2) for Secondary Plans states “Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied.” **As a block plan may not be required in all circumstances, we continue to suggest that “, where required,” be added after “is in place and”;**
- Policy 23.7.2 a) Prestige Employment Permitted Uses states “The following uses may be permitted within Prestige Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials”, whereas Policy 23.7.2 b) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” **We reiterate that we seek clarification regarding the difference between warehousing and large-scale warehousing as the two uses are not defined;**
- Policy 23.7.2 b) Prestige Employment Permitted Uses states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” Under the current Official Plan, the Prestige Industrial designation permits “Warehousing and wholesale operations”. **We reiterate that there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the BoltCol lands within the Prestige Industrial designation will be rendered non-conforming. In our submission, the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.7.3 a) states “The following discretionary uses may be permitted within the Prestige Employment designation: ...” **As many of the uses that are listed are indicated as “may be permitted” under Policy 23.7.2, we reiterate our request for clarification as to the policy intent;**
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **We reiterate that in our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
- Policy 23.8.2 a) General Employment Permitted Uses states “The following uses may be permitted within the General Employment designation: i) manufacturing, processing and warehousing with accessory outside storage”, whereas Policy 23.7.2 b) states “Large-scale warehousing, goods movement and logistics uses will not be permitted.” **We reiterate our request for clarification regarding the difference between warehousing and large-scale warehousing as the two uses are not defined;**
- Policy 23.8.2 b) General Employment Permitted Uses states “Large scale warehousing, goods movement and logistics uses will not be permitted.” Under the

- current Official Plan, the General Industrial designation permits “Warehousing and wholesale operations”. **We reiterate that there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the BoltCol lands within the General Industrial designation will be rendered non-conforming. In our submission, the General Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.9.1 a) states the planning objectives for the Goods Movement District designation are to “determine the location and extent of the district through the Trucking Strategy, to be completed by the Town” and 23.9.1.b states “provide long-term and stable locations for large scale warehousing, goods movement and logistics uses.” **We reiterate our request for clarification as to the implications for the BoltCol Lands where the Trucking Strategy has not been provided for review and the associated Goods Movement District designation has not yet been determined;**
  - Policy 23.9.1 e) states “Provide significant buffers from sensitive uses, roads and uses outside of the overlay area.” **We reiterate that in our submission, “Significant” should be deleted since it would be appropriate to determine the width of buffers through studies as part of site plan approval;**
  - Policy 23.9.2 a) states “The following uses may be permitted within the Goods Movement District designation: i) all uses permitted under the General Employment designation; ii) large scale warehousing, goods movement and logistics uses; iii) major office uses and employment-supportive uses; and, iv) open storage, including the storage of containers and truck storage.” **The non-policy text under Section 23.9 states “Through the preparation of the required secondary plans, a Goods Movement District designation may be applied as an overlay on top of the General Employment Area designation, which is to be informed by a Goods Movement Trucking Strategy prepared by the Town. The overlay is intended to accommodate large scale warehousing, goods movement and logistics uses including truck parking, container storage and other forms of outdoor storage”. We reiterate our request for clarification as to whether the Goods Movement District designation overlay removes uses that would otherwise be permitted in the underlying designation and that the Goods Movement District designation “overlay” will not be restricted to only the General Employment Areas designation, since under the current official Plan, “Warehousing and wholesale operations” uses are permitted in the Prestige Industrial Designation;**
  - Policy 24.4.1 states “Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town *will* [emphasis added] require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development” and Policy 24.4.2 states “Block plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town’s terms of reference. If a secondary plan includes the technical level of detail that would typically be included in a block plan, a separate block planning process *may not be required* [emphasis added], at the discretion of the Town.” **Since a block plan under an OPA may**

- not be appropriate in all circumstances, we reiterate our suggestion for Policy 24.4.1 that “will” be changed to “may” in order to provide flexibility;**
- Policy 25.5.7 a) states "The Town will require a comprehensive landowner group agreement that sets out the financial requirements for growth-related infrastructure and community services among participating landowners." **In our submission, "where required" should be added to the beginning in order to provide clarity.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Jonathan Rodger, MScPI, MCIP, RPP  
Principal Planner

cc. BoltCol Holdings North Inc. and BoltCol Holdings South Inc. (Via Email)  
Pitman Patterson, Borden Ladner Gervais LLP (Via Email)

#### 49. Michael Boyd

Mayor Grooves and members of council, I am a resident of the Town of Caledon and am part of the Caledon East Rural Neighbors group.

I have been made aware of the proposed changes to the draft Official Plan that relate to On-Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centers of a certain size. The size of the out buildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event center while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centers in a 4 km radius. These centers avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit.

Further, these centers are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Millcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income that is to neighboring farms and community friendly. What has happened with trucking yards is not. What is happening with the event centres now is not.



September 29, 2023

delivered electronically ONLY

## Town of Caledon

Town Hall  
6311 Old Church Road  
Caledon, On  
L7C 1J6

Attn:

**Mr. Carmine Caruso** [Carmine.caruso@caledon.ca](mailto:Carmine.caruso@caledon.ca)  
Interim Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>0 Airport Road E/S, Caledon, ON</b>
Property Ownership:	1313 Airport United Investments Inc.
Property Identification Number (PIN)	14327-0066 LT
Est. Total Lot Area:	39.98 Acres

Respected Officials:

We submit this letter to the Town of Caledon in regard to the Town's Request for Submission of properties of interest to be included with the Town's Growth Management and Phasing Plan. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

Our firm represent all Planning, Urban Design, and development application's related to the above noted address. In addition, RGC has been contacted by other landowners within the area of our clients' lands for information and inclusion and professional representation on their behalf.

We respectfully recognize that the subject lands fall within the pending Sandhill Secondary Plan Study area for Growth Management under the new Caledon Official Plan. We refer the Town to the RGC context map identifying the subject site. It is our client's intent to ensure that the subject lands be included within expected plan and study area, and by way of our office, we aim to work with Town officials in a timely manner. Deliberate Planning strategies must be implemented for these properties to ensure the efficient delivery infrastructure and protection of the financial and economic well-being as outlined in "Settlement Area Boundary Expansion."

In light of growing pressures from North Brampton and the many applications for conversion of lands from Employment to Non- Employment, it is our opinion that this development will comply with the Provincial Policy Statement.

RGC is prepared to work and consult with civic officials in order to ensure inclusion of this site within the settlement area expansion is manageable, buildable and achievable for the future success of this new community.

In conclusion, we hope that the Town will continue to communicate with all vested stakeholders directly.

We respectfully await *the Town's "NEXT STEPS"* approach and plan for implementation.

In the meantime, and mindful of time, kindly contact us at your convenience to continue this important discussion and acknowledge receipt of this letter.

Respectfully submitted,

**RG CONSULTING INC.**



**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group

cc. Harsh Pabla

cc. 1313 Airport United Investments Inc.

## CONTEXT MAP PREPARED FOR: 0 AIRPORT ROAD, E/S CALEDON, ON PIN 1432 - 0066

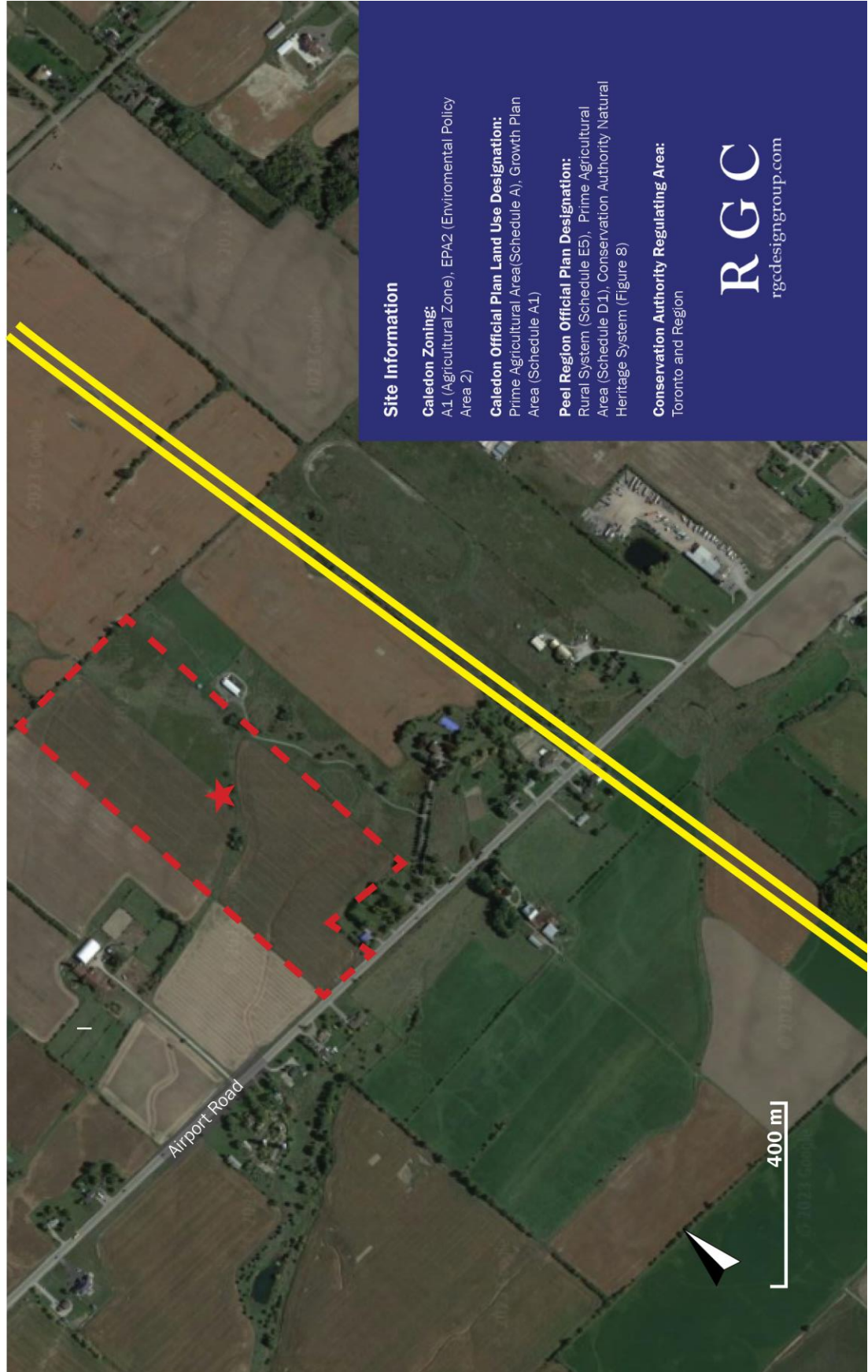
Prepared on:  
September 29, 2023

**Property Owner Information:**  
1313 Airport United Investments Inc.

**Map Source:**  
Google Earth 2023

### Legend:

Subject Sites:  
HWY 413 Preferred Route:  
(Estimated)



### Site Information

**Caledon Zoning:**  
A1 (Agricultural Zone), EPA2 (Environmental Policy Area 2)

**Caledon Official Plan Land Use Designation:**  
Prime Agricultural Area (Schedule A), Growth Plan Area (Schedule A1)

**Peel Region Official Plan Designation:**  
Rural System (Schedule E5), Prime Agricultural Area (Schedule D1), Conservation Authority Natural Heritage System (Figure 8)

**Conservation Authority Regulating Area:**  
Toronto and Region

**RGC**  
rgcdesigngroup.com

September 29, 2023

delivered electronically ONLY

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Town Hall  
6311 Old Church Road  
Caledon, On  
L7C 1J6

Attn:

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Interim Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>0 Heart Lake Road, Caledon, ON</b>
Property Ownership:	HLR Caledon Inc.
Property Identification Number (PIN)	14297-0156 LT
Est. Total Lot Area:	99.497 Acres

Respected Officials:

We submit this letter to the Town of Caledon in regard to the Town's Request for Submission of properties of interest to be included with the Town's Growth Management and Phasing Plan. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

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We respectfully recognize that the subject lands fall within the pending Secondary Plan Study area for Growth Management under the new Caledon Official Plan. We refer the Town to the RGC context map identifying the subject site. It is our client's intent to ensure that the subject lands be included within expected plan and study area, and by way of our office, we aim to work with Town officials in a timely manner. Deliberate Planning strategies must be implemented for these properties to ensure the efficient delivery infrastructure and protection of the financial and economic well-being as outlined in "Settlement Area Boundary Expansion."

In light of growing pressures from North Brampton and the many applications for conversion of lands from Employment to Non- Employment, it is our opinion that this development will comply with the Provincial Policy Statement.

RGC is prepared to work and consult with civic officials in order to ensure inclusion of this site within the settlement area expansion is manageable, buildable and achievable for the future success of this new community.

In conclusion, we hope that the Town will continue to communicate with all vested stakeholders directly.

We respectfully await *the Town's "NEXT STEPS"* approach and plan for implementation.



In the meantime, and mindful of time, kindly contact us at your convenience to continue this important discussion and acknowledge receipt of this letter.

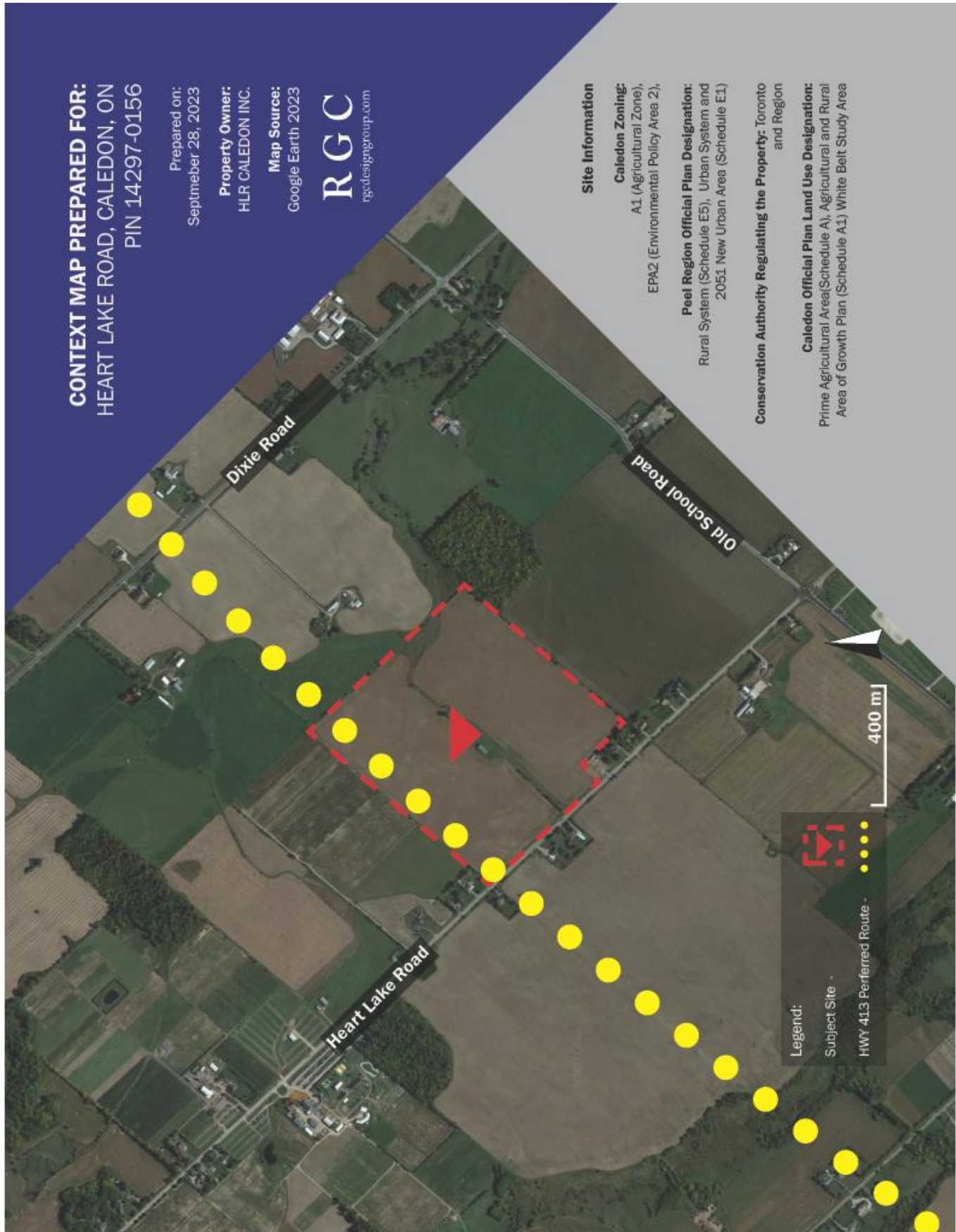
Respectfully submitted,

**RG CONSULTING INC.**



**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group  
cc. HLR Caledon Inc.



September 29, 2023

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L7C 1J6

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Interim Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>13306-13220 Kennedy Road, Caledon, ON</b>
Property Ownership:	Kennedy King Holding Inc.
Property Identification Number (PIN)	14297-0098 LT
Est. Total Lot Area:	116.77 Acres

## Respected Officials:

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**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group  
cc. Kennedy King Holdings Inc.





September 29, 2023

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L7C 1J6

Attn:

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**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>6339 King Street, Caledon, ON</b>
Property Ownership:	ILK Caledon Inc.
Property Identification Number (PIN)	14327-0436 LT
Est. Total Lot Area:	62 Acres

Respected Officials:

We submit this letter to the Town of Caledon in regard to the Town's Request for Submission of properties of interest to be included with the Town's Growth Management and Phasing Plan. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

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Respectfully submitted,

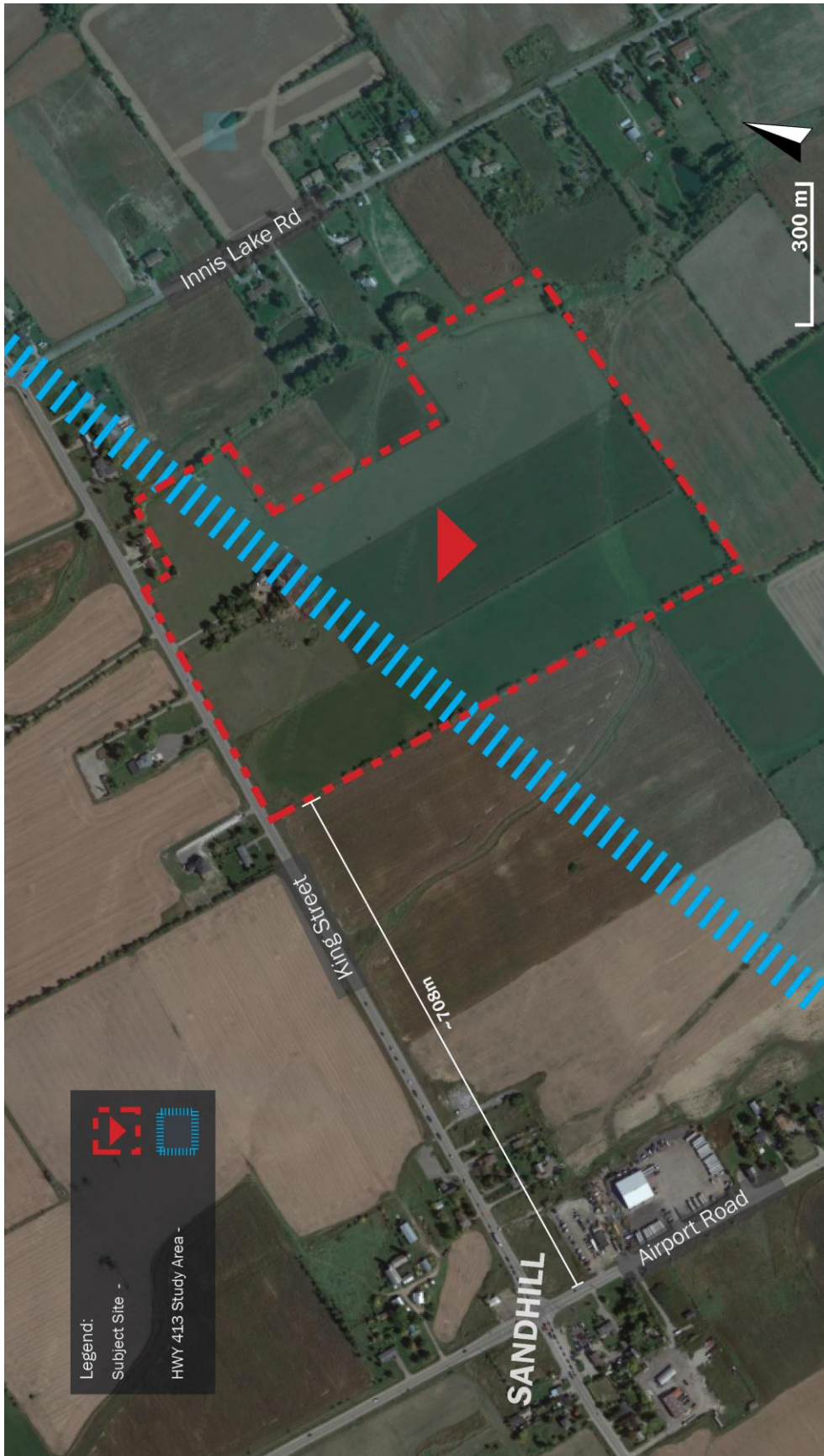
**RG CONSULTING INC.**



**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group  
cc. ILK Caledon Inc.





## CONTEXT MAP PREPARED FOR:

6339 KING STREET,  
CALEDON, ON  
PIN 14327 - 0438

**Property Owner Information:**  
ILK CALEDON INC.  
Prepared on September 29, 2023

## Site Information

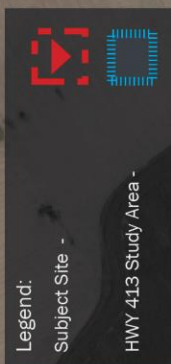
**Caledon Zoning:**  
A1 (Agricultural Zone), EPA2 (Environmental Policy Area 2)

**Caledon Official Plan Land Use Designation:**  
Prime Agricultural Area (Schedule A), Growth Plan Area (Schedule A1)

**Peel Region Official Plan Designation:**  
Rural System (Schedule E5), Prime Agricultural Area (Schedule D1), Conservation Authority Natural Heritage System (Figure 8)

**Conservation Authority Regulating Area:**  
Toronto and Region

**Map Source:**  
Google Earth 2023





September 29, 2023

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## Town of Caledon

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L7C 1J6

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Interim Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>13298 Torbram Road, Caledon, ON</b>
Property Ownership:	TRC ONE INC., TRC TWO INC.
Property Identification Number (PIN)	14298-0069 LT
Est. Total Lot Area:	98.6 Acres

## Respected Officials:

We submit this letter to the Town of Caledon in regard to the Town's Request for Submission of properties of interest to be included with the Town's Growth Management and Phasing Plan. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

Our firm represent all Planning, Urban Design, and development application's related to the above noted address. In addition, RGC has been contacted by other landowners within the area of our clients' lands for information and inclusion and professional representation on their behalf.

We respectfully recognize that the subject lands fall within the pending Secondary Plan Study area for Growth Management under the new Caledon Official Plan. We refer the Town to the RGC context map identifying the subject site. It is our client's intent to ensure that the subject lands be included within expected plan and study area, and by way of our office, we aim to work with Town officials in a timely manner. Deliberate Planning strategies must be implemented for these properties to ensure the efficient delivery infrastructure and protection of the financial and economic well-being as outlined in "Settlement Area Boundary Expansion."

In light of growing pressures from North Brampton and the many applications for conversion of lands from Employment to Non- Employment, it is our opinion that this development will comply with the Provincial Policy Statement.

RGC is prepared to work and consult with civic officials in order to ensure inclusion of this site within the settlement area expansion is manageable, buildable and achievable for the future success of this new community.

In conclusion, we hope that the Town will continue to communicate with all vested stakeholders directly.

We respectfully await *the Town's "NEXT STEPS"* approach and plan for implementation.

In the meantime, and mindful of time, kindly contact us at your convenience to continue this important discussion and acknowledge receipt of this letter.

Respectfully submitted,

**RG CONSULTING INC.**



**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group  
cc. TRC ONE INC.  
cc. TRC TWO INC.  
cc. Suneet Tuli

## 1. Site Context

The subject property is located on the west side of Torbram Road, and north of Old School Road in East Caledon. (Figure 1).

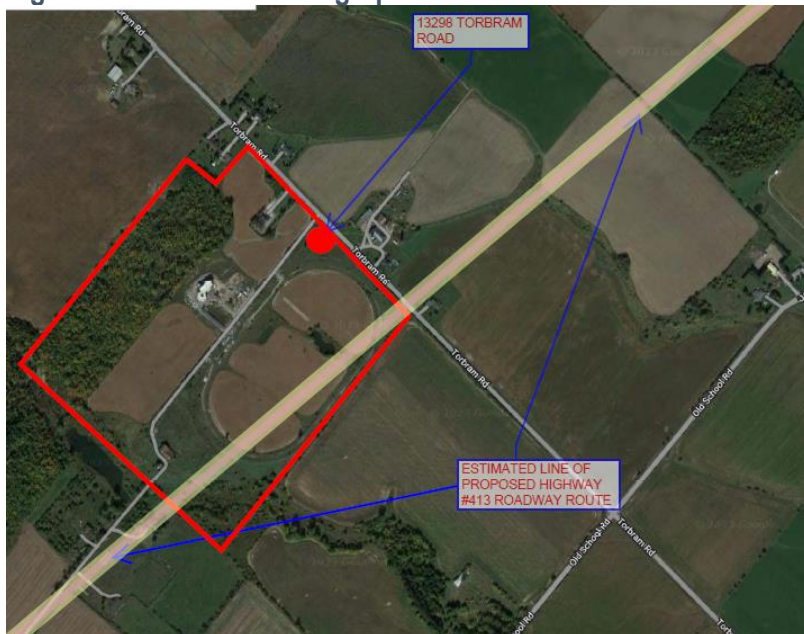
The subject property currently supports a single-family residential building (under construction), but the majority of the property lands remain vacant and undisturbed.

The overall size of the lands are approximately 98 acres in size with a frontage of approximately. The land survey is attached for further property limits.

Surrounding land uses include:

North	Agricultural Lands
East	Agricultural Lands
South	Mayfield Golf Club and Agricultural Lands
West	Downey's Farm Market and Agricultural Lands

Figure 1: Site Aerial Photograph



Source: Consent Sketch, Glen Schnarr and Associates Inc

Approximate Property Boundary

October 1, 2023

ATTN: Steve Burke, MCIP, RPP  
Town of Caledon  
Manager, Strategic Policy Planning  
Planning Department  
6311 Old Church Road  
Caledon ON L7C 1J6

RE: **12861 and 12489 Dixie Road, Caledon**  
**Request to Amend Draft Official Plan Mapping**

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**Summary and Background**

On behalf of QuadReal Property Group, Armstrong Planning & Project Management is submitting a request to amend draft Official Plan mapping to remove conceptual roads on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on our clients' lands (12861 and 12489 Dixie Road). Through the Region of Peel Official Plan Review, the subject lands were brought into the Regional Urban Boundary, and Designated Greenfield Area (Schedule E-3 of the Regional Official Plan). Further, Schedule E-4 (Employment Areas) designates these lands as Employment Area.

A pre-consultation meeting was held with Town staff on December 8, 2022. The meeting allowed for staff to provide preliminary feedback on a proposed concept plan, while also providing submission requirements. A formal submission has yet to be made on each property, however, it is expected that the submissions will be made before year-end 2023.

**Town of Caledon Official Plan Review**

The Town of Caledon is in the process of a Municipal Comprehensive Review of its Official Plan. The latest draft was released in August 2023, with comments due on October 2, 2023. Conceptual roads are shown on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on the subject lands. Draft Policy 11.3.1 provides that



the “*conceptual collector road network for the New Urban Area is set out on Schedule F1, Urban System.*”

**Request**

The subject lands are proposed to be developed with large-scale logistics uses. Roads through the subject lands are required to be private, secured, and controlled to support the proposed uses. Public roads through the site would be appropriate for smaller business park style lots; but large-scale logistics uses, already in the area due to proximity to Highway 410, don't require a fine-grained network of public roads. Private roads will ensure efficient and safe goods movement, and safe access for employees, while minimizing unnecessary conflict points with the general public.

Our client requests to amend draft Official Plan mapping to remove conceptual roads on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on the subject lands (12861 and 12489 Dixie Road). Ultimately there is little to no benefit in providing a public road network through the subject lands; and Official Plan mapping should be updated to remove conceptual roads.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Regards,



Scott Borden, RPP

Senior Planner, Project Manager

CC: John Marotta, QuadReal Property Group  
Vincent Raso, QuadReal Property Group  
Peter Kulkarni, QuadReal Property Group

October 1, 2023

ATTN: Steve Burke, MCIP, RPP  
Town of Caledon  
Manager, Strategic Policy Planning  
Planning Department  
6311 Old Church Road  
Caledon ON L7C 1J6

RE: **12862 and 12668 Dixie Road, Caledon**  
**Request to Amend Draft Official Plan Mapping and Policies**

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### **Summary and Background**

On behalf of Tribal Partners Canada Inc., Amazon Canada, and QuadReal Property Group; Armstrong Planning & Project Management is submitting a request to amend draft Official Plan mapping to remove conceptual roads on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on our clients' lands (12862 and 12668 Dixie Road) and provide other comments on the Draft Official Plan. Through the Region of Peel Official Plan Review, the subject lands were brought into the Regional Urban Boundary, and Designated Greenfield Area (Schedule E-3 of the Regional Official Plan). Further, Schedule E-4 (Employment Areas) designates these lands as Employment Area.

Local Official Plan Amendment, Zoning By-Law Amendment and Site Plan Applications were submitted for the subject lands in February 2021 and deemed complete in April 2021. On May 17, 2023, 'Enhanced Review Planning' comments were provided by the Town, Region, and Toronto and Region Conservation Authority. The 'Enhanced Review Planning' comments identified a requirement for a Draft Plan of Subdivision application to establish a public road network on the subject lands. In a response letter dated July 27, 2023, several issues were raised including the requirement for public roads through the subject lands.

### **Town of Caledon Official Plan Review**

#### *Conceptual Roads*

The Town of Caledon is in the process of a Municipal Comprehensive Review of its Official Plan. The latest draft was released in August 2023, with comments due on October 2, 2023. Conceptual roads are shown on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on the subject lands. Draft Policy 11.3.1 provides that

the “conceptual collector road network for the New Urban Area is set out on Schedule F1, Urban System.” We note a small discrepancy between Schedule C1 and F1: Schedule C1 shows both a north-south and east-west conceptual road through the subject lands; while Schedule F1 shows just an east-west conceptual road through the subject lands.

#### *Secondary Planning*

Additionally, there are a number of proposed policies under Section 21.4 which outline the requirements for Secondary Plans in the Town of Caledon. Specifically Draft Policy 21.4.1 requires that:

*“Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.”*

Draft Policy 21.4.2 provides:

*“Privately initiated secondary plans will not be supported.”*

#### **Request**

##### *Conceptual Roads*

The subject lands are proposed to be developed with large-scale logistics uses. Roads through the subject lands are required to be private, secured, and controlled to support the proposed uses. Public roads through the site would be appropriate for smaller business park style lots; but large-scale logistics uses, already in the area due to proximity to Highway 410, don’t require a fine-grained network of public roads. Private roads will ensure efficient and safe goods movement, and safe access for employees, while minimizing unnecessary conflict points with the general public.

Our clients request to amend draft Official Plan mapping to remove conceptual roads on Schedule C1 (Town-wide Transportation Network) and Schedule F1 (Urban System) to the Town of Caledon Draft Official Plan (August 2023) on the subject lands (12862 and 12668 Dixie Road). Ultimately there is little to no benefit in providing a public road network through the subject lands. The Draft Official Plan does not recognize the existing ‘complete’ applications for the subject lands; therefore Official Plan mapping should be updated to remove conceptual roads.

#### *Secondary Planning*

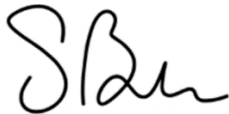
We request that an additional policy be added under Section 21.4 that acknowledges applications deemed ‘complete’ which were submitted in advance of Secondary Plans. The Town of Caledon

developed the 'Enhanced Planning Review' process for applications deemed 'complete' in advance of Secondary Plans. A policy should be added which recognizes this process.

Additionally, with respect to Draft Policy 21.4.2, we request that privately initiated (land-owner group) secondary plans be permitted. Privately initiated secondary plans will ensure planning staff are not overburdened and will ultimately assist the Town in meeting its growth.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Regards,

A handwritten signature in black ink, appearing to read 'SB' followed by a stylized flourish.

Scott Borden, RPP  
Senior Planner, Project Manager

CC: Robin Comfort, Tribal Partners  
Michelle Lamothe, Tribal Partners  
John Marotta, QuadReal Property Group



Good Evening,

As discussions progress regarding the Future Caledon Official Plan, I wish to draw the town's attention to the property located at 15886 Centreville Creek Road, Caledon, ON.

This property spans approximately 99.2 acres and boasts dual frontages on Innis Lake Road and Centreville Creek Road. Notably, it directly adjoins the proposed Urban Area boundary along Innis Lake Road.

Given its proximity to the proposed Urban Area, we kindly request the town to consider extending the Urban Area boundary to encompass 15886 Centreville Creek Road. It's pertinent to mention that the land across from this property, stretching between Innis Lake Road and Centreville Creek Road, is already included within the Urban Area.

Currently, the property is governed by the Oak Ridges Moraine Conservation Plan, bearing the Land Use Designation of Countryside Area—a designation shared with the reputable Palgrave Estates Residential Community. Additionally, under the realm of Land Use Designations, the property is categorized as Rural Lands and is not encompassed by any of the Landform Conservation Areas identified by the Oak Ridges Moraine.

I am immensely grateful for the opportunity provided by the town to express our views. Having been a resident of Caledon since 2014, I am proud to call Caledon home and am fully willing to collaborate with the town to address its needs.

Thank you,  
Amar Sohi



**VIA EMAIL**

October 2, 2023

Mayor and Members of Council  
Town of Caledon  
6311 Old Church Road  
Caledon East, Ontario L7C 1J6

Attention: Ms. Laura Hall, Town Clerk

Dear Sirs/Mesdames:

**Re: Town of Caledon Official Plan Review  
Future Caledon Official Plan – August 2023 Draft  
Preliminary Comments on Behalf of 8281 Healey Road GP Limited**  
**Our File: ONE/CAD/22-02**

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We are the planning consultants for 8281 Healey Road GP Limited (“One Properties”) for the Town of Caledon Official Plan Review. One Properties is the owner of approximately 13.56 ha (33.51 ac) of lands within the Town of Caledon (the “One Lands”), located at 8281 and 0 Healey Road.

The One Lands are subject to a current Site Plan Approval application for a warehouse building (Town file SPA 21-9). The One Lands were subject to a prior Zoning By-law Amendment application (Town File RZ 2020-0007), generally for the realignment of the environmental protection lands.

As part of the Town’s Official Plan Review, a Draft Official Plan was released in March 2022 for public comment. On behalf of One Properties, we submitted preliminary comments on April 19, 2022. The Town of Caledon released a second Draft Official Plan in June 2023 for public review, for which we submitted preliminary comments on July 27, 2023. The Town of Caledon released a third Draft Official Plan in August 2023 for public review. On behalf of One Properties, we have preliminary comments as outlined below, and will continue to review the August 2023 Draft Official Plan in detail, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule B1 Town Structure, the One Lands are shown as Urban Area;
- On Schedule B2 Growth Management, the One Lands are shown as Designated Greenfield Area, and located within the Provincially Significant Employment Zone;
- On Schedule B4 Land Use Designations, the One Lands are partially shown as New Employment and “Refer to 1976 Official Plan”;
- On Schedule C1 Town Wide Transportation Network, the One Lands are shown within the Settlement Area, with frontage along Healy Road which is identified as

- 
- a Town Arterial Road. A Conceptual Collector Road is identified to the west of the One Lands, in a north-south direction;
  - On Schedule C2 Road Right-of-Way Widths, Healey is shown with a 36 m ROW (26 m ROW under current Official Plan);
  - On Schedule D1 Natural Environment System, the Natural Features and Areas and watercourse is shown along portions of the One Lands; and
  - On Schedule D3a Water Resources System Areas, areas of Highly Vulnerable Aquifers are shown within portions of the One Properties Lands.

**We reiterate our general comments, including:**

- We continue to be concerned with the implications of the draft Official Plan policy framework for the One Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies; and**
- We understand the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. Section 21 of the Draft Official Plan states, “These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses”, whereby we understand that the Town is projecting that the land use designations will not form a part of this Official Plan. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that it would be premature to proceed with consideration of the Official Plan without the land use schedules for the Urban System.**

For the comments below, please note that the references to “Formerly Policy” refers to the Policies under the June 2023 Draft Official Plan. At this time, our preliminary comments for the August 2023 Draft Official Plan are as follows:

- On Schedule C2 Road Right-of-Way Widths, Healey Road is shown with a 36 m ROW, whereas the in-effect Official Plan identifies a 26 m ROW. **We reiterate our comments seeking clarification as to the need for such a significant increase and whether this is based on a specific background study, and implications for existing developments;**
- Policy 5.4.1 states “The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan” and Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” **We reiterate that in our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policies. In our submission, Green Development Standards should incorporate flexibility in application in order to recognize site specific**

- context and operational aspects. Accordingly, Policy 5.4.1 should be revised to delete “mandatory” and Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;
- Policy 7.2.3 states “All development in the Urban System will: ... b) adhere to the design policies in Part F, Urban System.” **We request clarification as to what specific design policies are being referenced;**
  - Policy 7.3.13 (formerly Policy 7.5.3) states “Pedestrian linkages *will* [emphasis added] be incorporated into the design of new development between uses and adjacent sites, and through sites on large blocks to create mid-block connections from internal residential areas to major collectors, arterial and other significant road corridors.” **We reiterate our comment that flexibility should be added to the policy by changing “will” to “should” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian linkages. The policy refers to connections to “internal residential areas”, which may not be applicable to or appropriate for employment blocks (in particular for the One Lands);**
  - Policy 7.7.1 states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... e) on larger sites, use existing or create new publicly accessible mid-block pedestrian connections. Mid-block connections should be direct, logical, and continuous to limit the need for added wayfinding measures.” **In our submission, flexibility should be added to the policy by adding “where appropriate” before “use existing or create” since it may not be appropriate under all circumstances to link adjacent sites with pedestrian connections. In addition, we request clarification as to the two similar policies 7.3.13 and 7.7.1 in terms of what is the difference between “pedestrian linkages” and “pedestrian connections”;**
  - Policy 7.8.6 states “Building servicing, as well as parking, access, loading, and waste collection areas, will be integrated into the building design, located away from sensitive land uses, and be separated and screened from the public realm.” **We note the similar Policy 7.7.1 that states “The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will: ... c) ensure site servicing components are functional, attractive and appropriately screened from view from the public realm. Loading areas, utilities/mechanical equipment, should be located and integrated within a building. Where not feasible, these elements should be directed away and screened from the public realm” where there is flexibility. In our submission, similar flexibility should be added to Policy 7.8.6;**
  - Policy 7.10.7 states “Truck and/or trailer parking, staging or loading areas *will* [emphasis added] not be located between the front elevation of a building and a public street and will be screened from the public realm.” **In our submission, the first “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
  - Policy 12.7.2 (Formerly Policy 12.5.2) states “All public and private development stormwater servicing regulatory compliance will abide by all applicable legislation, and will be designed to: ... k) provide amenity spaces that are integrated into the design of neighbourhoods, development sites, parks, and open spaces”. **We**



reiterate our comment that flexibility through encouragement language should be incorporated since amenity spaces are not appropriate under all circumstances and in particular for private SWM ponds that are associated with employment lands development;

- Policy 21 states “The policies of Part F establish the land use designations and supporting policies to implement the Urban System components of the Town Structure in accordance with the Plan’s vision and guiding principles. These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses.” **We reiterate our general comment and suggest it is premature to approve the Official Plan as drafted, without the land use schedule for the Urban System;**
- Policy 21.2.2 states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan), and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We note our general comment above and reserve the opportunity to participate in the detailed review of the existing secondary plans;**
- Policy 23.7.2 a) Prestige Employment Permitted Uses states “The following uses may be permitted within Prestige Employment designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials”, whereas Policy 23.7.2 b) states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” **We reiterate that we seek clarification regarding the difference between warehousing and large-scale warehousing as the two uses are not defined;**
- Policy 23.7.2 b) Prestige Employment Permitted Uses states “Outdoor storage, large-scale warehousing, goods movement and logistics will not be permitted.” Under the current Official Plan, the Prestige Industrial designation permits “Warehousing and wholesale operations”. **We reiterate that there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the One Lands within the Prestige Industrial designation will be rendered non-conforming. In our submission, the Prestige Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.7.3 a) states “The following discretionary uses may be permitted within the Prestige Employment designation: ...” **As many of the uses that are listed are indicated as “may be permitted” under Policy 23.7.2, we reiterate our request for clarification as to the policy intent;**
- Policy 23.7.4 b) states “Buildings *will* [emphasis added] be located close to the street edge in attractively landscaped settings.” **We reiterate that in our submission, “will” should be changed to “should” in order to provide flexibility to account for site context and operational considerations;**
- Policy 23.8.2 a) General Employment Permitted Uses states “The following uses may be permitted within the General Employment designation: i) manufacturing, processing and warehousing with accessory outside storage”, whereas Policy 23.7.2 b) states “Large-scale warehousing, goods movement and logistics uses will not be permitted.” **We reiterate our request for clarification regarding the**

**difference between warehousing and large-scale warehousing as the two uses are not defined;**

- Policy 23.8.2 b) General Employment Permitted Uses states “Large scale warehousing, goods movement and logistics uses will not be permitted.” Under the current Official Plan, the General Industrial designation permits “Warehousing and wholesale operations”. **We reiterate that there is a concern as to the continued permissions for warehousing and that existing warehousing operations on the One lands within the General Industrial designation will be rendered non-conforming. In our submission, the General Employment designation should continue to permit warehousing, goods movement and logistics uses;**
- Policy 23.9.1 a) states the planning objectives for the Goods Movement District designation are to “determine the location and extent of the district through the Trucking Strategy, to be completed by the Town” and 23.9.1.b states “provide long-term and stable locations for large scale warehousing, goods movement and logistics uses.” **We reiterate our request for clarification as to the implications for the One Lands where the Trucking Strategy has not been provided for review and the associated Goods Movement District designation has not yet been determined;**
- Policy 23.9.1 e) states “Provide significant buffers from sensitive uses, roads and uses outside of the overlay area.” **We reiterate that in our submission, “Significant” should be deleted since it would be appropriate to determine the width of buffers through studies as part of site plan approval;**
- Policy 23.9.2 a) states “The following uses may be permitted within the Goods Movement District designation: i) all uses permitted under the General Employment designation; ii) large scale warehousing, goods movement and logistics uses; iii) major office uses and employment-supportive uses; and, iv) open storage, including the storage of containers and truck storage.” The non-policy text under Section 23.9 states “Through the preparation of the required secondary plans, a Goods Movement District designation may be applied as an overlay on top of the General Employment Area designation, which is to be informed by a Goods Movement Trucking Strategy prepared by the Town. The overlay is intended to accommodate large scale warehousing, goods movement and logistics uses including truck parking, container storage and other forms of outdoor storage”. **We reiterate our request for clarification as to whether the Goods Movement District designation overlay removes uses that would otherwise be permitted in the underlying designation and that the Goods Movement District designation “overlay” will not be restricted to only the General Employment Areas designation, since under the current official Plan, “Warehousing and wholesale operations” uses are permitted in the Prestige Industrial Designation;**
- Policy 24.4.1 states “Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town *will* [emphasis added] require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development” and Policy 24.4.2 states “Block plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town’s terms of reference. If a secondary plan includes the technical level of detail that would typically be included in a block plan, a separate block planning process *may not be required* [emphasis

- added], at the discretion of the Town.” **We reiterate that since a block plan under an OPA may not be appropriate in all circumstances, we suggest that for Policy 24.4.1 “will” be changed to “may” in order to provide clarity;**
- Policy 25.4.2 a) states “Minor variances to the requirements of the Town’s zoning by-laws will be considered in accordance with the provisions of the Planning Act and this Plan, including the pre-consultation and complete application requirements.” The Planning Act authorizes municipalities to require consultation for certain planning applications, however, the Planning Act does not extend a requirement for pre-consultation to applications for Minor Variance. Similarly, the Planning Act establishes the concept of a complete application, however Minor Variances are not subject to a review of completeness. **We reiterate our comments suggesting Policy 25.4.2a) be revised to remove “, including the pre-consultation and complete application requirements”;** and
  - Policy 25.5.7 a) states “The Town will require a comprehensive landowner group agreement that sets out the financial requirements for growth-related infrastructure and community services among participating landowners.” In our submission, **we suggest “where required” be added to the beginning in order to provide clarity.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. 8281 Healey Road GP Limited (via email)



September 29, 2023

**DELIVERED VIA EMAIL**

Town of Caledon City Council  
Town of Caledon  
6311 Old Church Road

Ms. Antonietta Minichillo  
Chief Planner/Director of Planning  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Mr. Steve Burke, MCIP, RPP  
Manager, Strategy Policy Planning  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Dear Members of Council:

Re: Town of Caledon Official Plan Review  
12862 Dixie Road, Caledon ON  
Comments submitted by Amazon Canada Fulfillment Services, ULC

Amazon Canada Fulfillment Services, ULC ("**Amazon**") is the owner of the property municipally known as 12862 Dixie Road and legally described in PIN 14235-7076 as PT LT 21 CON 3 EHS CHINGUACOUSY; PT LT 22 CON 3 EHS CHINGUACOUSY; PARTS 1, 3 & 6, PLAN 43R40325 (the "**Subject Lands**"), in the Town of Caledon (the "**Town**"). A map showing the property boundaries of the Subject Lands is attached to this letter as **Schedule "A"**.

As you may be aware, Amazon is seeking development approvals for the Subject Lands that will permit the construction of a future Amazon Fulfillment Centre, an e-commerce facility.

The most recent draft of the Future Caledon Official Plan (the "**Draft Official Plan**") proposes public roads on the Subject Lands that will significantly impact the viability of the proposed potential development. We are writing to express Amazon's concerns with



the proposed public road network and to request a meeting with Town Staff to discuss potential solutions and/or alternatives to the Town's proposal.

### **The Proposed Development of the Subject Lands**

In February 2021, Amazon's development partner, Tribal Partners Canada Inc. ("**Tribal**"), submitted Local Official Plan Amendment, Zoning By-Law Amendment, and Site Plan Applications for the property municipally known as 12862 Dixie Road (the "**Development Applications**"), which were deemed complete by the Town in April 2021. In February 2022, 12862 Dixie Road was severed into two separate parcels, 12862 Dixie Road (i.e., the Subject Lands), and 12668 Dixie Road, which is owned by QR Dixie North GP Inc., and which is also proposed to be developed in conjunction with the Subject Lands for employment uses (the "**QuadReal Lands**").

As noted above, the Development Applications propose Official Plan, Zoning By-law Amendment, and Site Plan Approvals that will permit the construction of a potential Amazon Fulfillment Center, a warehouse and distribution center.

### **Amazon's Concerns with the Proposed Public Road Network**

In May 2023, more than two years after the Development Applications were deemed complete, the Town, Region, and commenting agencies provided comments on the Development Applications indicating a new requirement for draft plan of subdivision approval for the purposes of establishing a public road network on the Subject Lands (and the adjacent QuadReal Lands).

In August 2023, the Town released a third draft of the Future Caledon Official Plan, which also proposes a conceptual public collector road network that will bisect the Subject Lands (see Schedule C-1 and Schedule F-1, which appear to propose slightly different variations of a public collector road network that will bisect the Subject Lands).

The draft policies indicate that the proposed public collector road network is "conceptual" (see Draft Policy 11.3.1), and that new collector roads will be subject to future study (see Draft Policy 11.3.8). Amazon requests, however, that Schedule C1 and F1 be amended to remove any reference to public collector roads that bisect the Subject Lands. The proposed public collector road network is inconsistent with the Development Applications and will have significant impacts on the developability of the Subject Lands. Amazon's concerns with the proposed public collector road network include, but are not limited to, a significant loss of parking area, the requirement to relocate a storm water facility, and the creation of additional setbacks and greater rights-of-way that will

decrease the amount of developable area for employment uses. The proposed collector road network also threatens the potential to develop the Subject Lands in a manner that is consistent with Amazon's specific operational requirements for its facilities. In similar developments throughout the Greater Toronto Area and southern Ontario, roads adjacent to Amazon facilities are private, secured, and controlled, while truck traffic is separated from employee traffic. These requirements are essential to Amazon's operations and ensure efficient and safe goods movement and safe access to the facility for employees.

### **Conclusions and Next Steps**

The potential future development of an Amazon Fulfillment Center on the Subject Lands when and if built, promises to deliver significant employment opportunities to the Town, its residents, and the Province of Ontario, as a whole. Amazon would like the opportunity to collaborate with the Town to ensure that the proposed public collector road is removed from the Draft Official Plan as it relates to the Subject Lands, and to ensure that the Town's concerns regarding the future road network are resolved in a manner that does not impact the overall viability of the proposed development on the Subject Lands.

Accordingly, we respectfully request the opportunity to meet with Town Staff (and Region of Peel staff, as necessary), to discuss this matter and to explore potential solutions and/or alternatives to the proposed road network.

In any event, please ensure that a copy of this letter is provided to City Council in advance of the adoption of the Draft Official Plan.

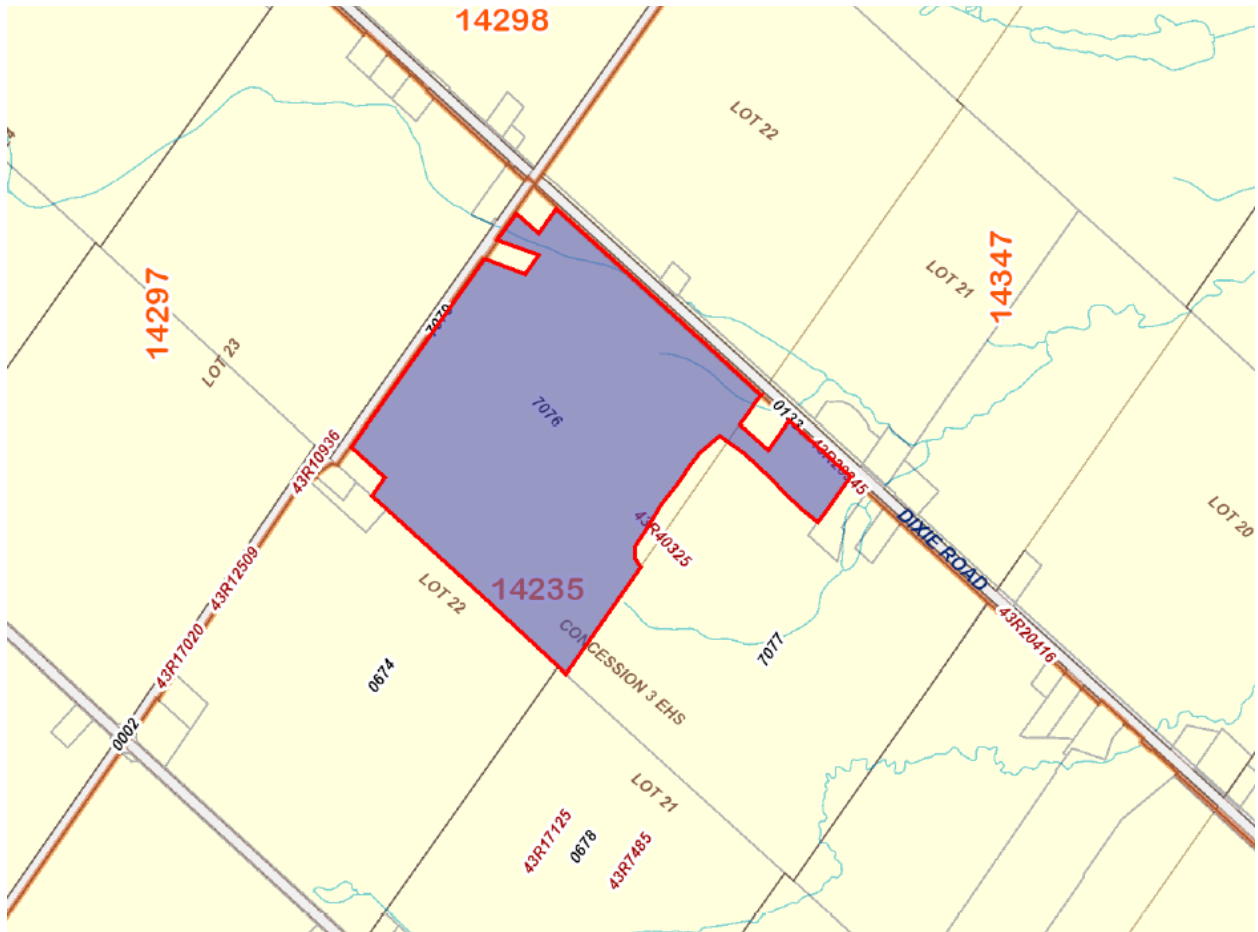
We look forward to hearing from you.

Very truly yours,



Eric Strauss  
Sr. Development Manager

## Schedule A



Planning and Development Services  
Town of Caledon  
6311 Old Church Road

October 2, 2023  
File 10208

**Attn: Bailey Loverock, Senior Policy Planner**  
**Strategic Policy Planning, Planning Department**

**RE: Comments on the Town of Caledon Draft Official Plan**  
**0 & 12245 Torbram Road**  
**Part of Lots 17 to 20, Concession 6 Chinguacousy EHS (Chinguacousy)**

Weston Consulting is the planning consultant for Tullamore Industrial GP Limited, the registered owner of the lands generally bordered by Airport Road to the east, Torbram Road to the west and Mayfield Road to the south municipally known as 0 & 12245 Torbram Road (the “subject lands”). The subject lands are generally located within the block west of Airport Road, north of Mayfield Road and east of Torbram Road. Official Plan Amendment and Draft Plan of Subdivision Applications have been submitted to the Town to permit an the development of approximately 560,000 square metres of industrial/warehouse/distribution space (POPA 2021-0007, RZ 2021-0013 and DART 2023-0010).

We have reviewed the Town’s Draft Official Plan and Schedules and are please to provide the following comments.

1. Proposed Land Use Designation

The subject lands are located within the *Urban Area* according to Draft Schedule B1 (Town Structure) and the *New Urban Area 2051* according to Draft Schedule B2 (Growth Management). Draft Schedule B4 (Land Use Designations) and Draft Schedule F1 (Urban System) designate the subject lands *New Employment Area*. The proposed land use designation is consistent with the Regional Official Plan. We support the proposed land use designations identified in the Draft Schedules.

2. Proposed Road Pattern

We note that Draft Schedule C1 (Town Wide Transportation Network) and Draft Schedule F1 (Urban System) identifies a *Conceptual Collector Roads* pattern through the subject lands. Draft Schedule C3 (20151 Town Wide Transit Network) also identities a *Proposed Collector Road* network through the subject lands. The proposed Draft Plan of Subdivision that is under review by Staff contemplates three new roads that will provide connectivity to the surrounding area. In our opinion, this should form the basis of the proposed Schedules. We recommend Draft Schedules C1, F1, and C3 be modified to include the road network in accordance with the Draft Plan of Subdivision and ensure that policies permit flexibility in final width, classification, and location.

3. Natural Features

We have reviewed the draft Schedules as it relates to natural features on the subject lands and note the following is identified on the subject lands:

- *Natural Features and Areas* are identified on the subject lands according to Draft Schedule B1 (Town Structure) and Draft Schedule B4 (Land Use Designations)

- *Permanent and Intermittent Streams* are identified on the subject lands according to Draft Schedule D1 (Natural Environment System)
- *Valley and Stream Corridors* and *Wetlands* are identified on the subject lands according to Draft Schedule D2 (Natural and Supporting Features and Areas)

We recommend the draft Policies in Part D (Natural Environment System, Parks and Open Space) and the proposed Schedules be modified to ensure that the identification of *Natural Features and Areas*, *Permanent and Intermittent Streams*, *Valley and Stream Corridors*, and *Wetlands* may be modified and/or removed without amendment. Accordingly, we recommend that the draft Official Plan can be modified to confirm the location of these features will be subject to appropriate environmental technical studies. Furthermore, we recommend that policies in the draft Official Plan direct that the Schedules that identify these features can be modified and/or removed without an amendment to the Official Plan subject to the findings of appropriate environmental studies.

#### 4. Accessory Outdoor Storage, Open Storage Uses, Contractors Yards and Truck and Trailer Parking

We have reviewed the policies in Section 23.5 of the draft Official Plan related to *Accessory Outdoor Storage*, *Open Storage Uses*, *Contractors Yards* and *Truck and Trailer Parking*. Specifically,

*23.5.1 Where the policies of this Plan permit accessory outdoor storage, open storage uses, contractors yards and truck and trailer parking within Employment Areas, the policies of this section apply.*

##### *23.5.2 Accessory Outdoor Storage*

- Accessory outdoor storage for the purposes of this policy is the outdoor storage of raw materials, finished materials and/or commodities that is accessory to the principal use of the property, with that principal use located within a building(s).*
- Accessory outdoor storage is not permitted in the front yard or exterior side yard of a lot that fronts on a Provincial highway, a Regional Road or a Town arterial road.*
- Accessory outdoor storage is permitted within the interior side and rear yard provided year-round screening is provided through the use of landscaping, berms and/or solid fencing.*
- Maximum heights for outdoor storage should be included within the implementing Zoning By-law.*

##### *23.5.3 Accessory Truck and Trailer Parking*

- Where the outdoor parking of trucks is required in conjunction with a permitted use that is conducted within a building, the parking of trucks is only permitted within the rear and interior side yards provided year-round screening is provided through the use of landscaping, berms and/or solid fencing. The outdoor parking of trucks is not permitted within a front or exterior side yard.*

##### *23.5.4 Open Storage Uses, Contractors Yards and Truck Parking*

- The policies of this section apply to open storage uses, contractors yards and truck parking yards that are the principal use of a lot. In cases such as these, the use of the entire property for such uses is permitted provided year-round screening is provided on all lot lines through the use of landscaping, berms and/or solid fencing.*
- Maximum heights for open storage should be included within the implementing Zoning By-law.*

The policies related to the location and screening of outdoor storage area are too prescriptive in our opinion. We recommend these policies be modified or removed from the draft Official Plan and either included in a future Secondary Plan or be addressed through the Zoning By-law.





Thank you for the opportunity to provide comments on the Town's draft Official Plan. We reserve the right to provide additional comments in the future. We also reserve the right to provide comments on a future Secondary Plan process. Please do not hesitate to contact the undersigned should you have any questions.

Yours truly,  
**Weston Consulting**  
Per:

A handwritten signature in black ink, appearing to be "Ryan Guetter", written over a large, stylized "W" that is part of the Weston Consulting logo.

Ryan Guetter, BES, MCIP, RPP  
Executive Vice President

Cc: Tullamore Industrial GP Limited

Town of Caledon  
Official Plan Review  
6311 Old Church Road  
ON, L7C 1J6

By e-mail: [opreview@caledon.ca](mailto:opreview@caledon.ca)

Monday, October 2<sup>nd</sup>, 2023

DPS File: 1969

**RE: Caledon Comprehensive Official Plan Review  
18314 and 18309 Hurontario Street  
Comments on Draft Official Plan**

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We are writing this letter on behalf of the owners of the above-noted properties in the Town of Caledon. This letter constitutes our formal submission to the Town on the comprehensive Official Plan review, and comments on the August 2023 draft Official Plan released through the Town's website and specifically located at [Future Caledon: Our Official Plan | Have Your Say Town of Caledon previously Future Caledon \(haveyoursaycaledon.ca\)](https://www.haveyoursaycaledon.ca) as found on October 2<sup>nd</sup>, 2023.

The properties at 18314 and 18309 Hurontario Street are hereafter referred to as the "Subject Property". The Subject Property is located in the south-west portion of Caledon Village, within the Town of Caledon, in the Regional Municipality of Peel. It is more specifically located on the west side of Hurontario Street, generally south of Charleston Sideroad. The legal descriptions of the Subject Property are Part of Lot 15, Concession 1, West of Hurontario Street (Former Township of Caledon, County of Peel) PT1, 43R7750 and Part of Lot 15, Concession 1, West of Hurontario Street (Former Township of Caledon, County of Peel) PT2, 43R7750 in the Town of Caledon within the Regional Municipality of Peel. The municipal addresses are 18314 & 18309 Hurontario Street. The Subject Property is currently occupied by a two-storey single detached residential dwelling with a one-storey addition. The existing residential dwelling is designated under Section 29 of the Ontario Heritage Act as a property of architectural and/or historical value or interest. The Subject Property is a total of 1.38 ha in size and is generally rectangular in shape, with approximately 133.95 metres of frontage on Hurontario Street, and an approximate depth of 107.93 metres. The existing residential dwelling is located at the northeast corner of the Subject Property and the balance of the lot is currently vacant. There is a small "bump-out" of the front line abutting Hurontario Street, which extends further towards Hurontario Street as compared to the majority of the front lot line along Hurontario Street. There is an existing retaining wall located at the southwest corner of the Subject Property and another existing retaining wall located on the northwest portion of the Subject Property, in close proximity to the existing residential dwelling. As well, there is an existing municipal water-main along Hurontario Street. To the north of the Subject Property, there are predominantly residential uses with some commercial and institutional land uses as well. Immediately north,



**DESIGN  
PLAN  
SERVICES**  
TOWN  
PLANNING  
CONSULTANTS

## 58. David Igelman

there is a detached residential dwelling at 18322 Hurontario Street. Further north, there are commercial and institutional uses such as: a coffee shop (approx. 214m), a gas station (approx. 325m), and a place of worship 5 (approx. 267m). Additionally, Mistywood Park is located further northwest of the Subject Property (approx. 604m). To the immediate south of the Subject Property, there are single detached dwellings as well. Further south, there is an active aggregate mine, approximately 1.4 km away (more commonly known as the James Dick Aggregate Pits or Caledon Sand and Gravel). The closest part of the aggregate extraction appears to be over 300m away from the Subject Property with residential land uses between that area and the Subject Property. The lands east of the Subject Property are largely made up of residential uses consisting of detached dwellings. The Caledon Fairgrounds is located in close proximity to the Subject Property (across Hurontario Street). Caledon Central Public School is located further east of the Subject Property. The immediate land uses to the west are largely residential and also mostly consist of single detached dwellings. Further west, there is a portion of the aggregate mine that extends to the northwest of Caledon Village.

The proposed August 2023 Draft Official Plan proposes to designate the Subject Property as “Villages and Hamlets” as per Schedule E4 of the Draft Official Plan (see Attachment “A” to this letter). Section 18 of the proposed draft Official Plan sets out policies applicable to “Villages and Hamlets”. We respectfully submit that some policies contained within Section 18 are not appropriate and will not serve to implement the Provincial policies of the PPS and Growth Plan with respect to development and intensification within designated settlement areas. Proposed policy 18.2.9 sets out development criteria for development within “Villages and Hamlets”. Proposed policy 18.2.9 places unnecessary and onerous criteria for new development that will make it difficult for new development to contribute to enhancing the “Villages and Hamlets”. The proposed criteria within policy 18.2.9 will effectively require that all new development be very similar to the existing development within “Villages and Hamlets” and will restrict other built-forms and building types that do not already exist within “Villages and Hamlets”. Caledon Village is currently mostly single-detached dwellings and such, if policy 18.2.9 is applicable to the Subject Property, new development on the Subject Property that does not consist of single-detached dwellings of a similar scale to the existing dwellings in Caledon Village will likely not meet the criteria set out within policy 18.2.9. This is contrary to other policies and objectives that promote efficient development and a range and mix of housing options within settlement areas such as policy 1.1.1(a), 1.1.3.1, 1.1.3.2(a)-(f), 1.4.3(b) and (d) of the PPS, policy 2.2.1.4(c), 2.2.1.2(a)-(b), 2.2.6.1(a), 2.2.6.2(a)-(d), and 2.2.6.3 of the Growth Plan, as well as a key finding of a Town-initiated housing study completed in 2017 which stated that there is a need for a more diverse range of housing options. Similarly, proposed policy 18.2.10 of the proposed Draft Official Plan sets out onerous and restrictive criteria for lot creation within “Villages and Hamlets”. The proposed lot creation criteria within proposed policy 18.2.10 will serve to limit and restrict a range and mix of housing options within Caledon Village which is also contrary to the aforementioned Provincial policies and general objectives to promote efficient development, promote a range and mix of housing options, and direct growth to settlement areas. The proposed Draft Official Plan should be revised to remove onerous and restrictive policies for development within “Villages and Hamlets”, should provide for a more specific list of permitted residential uses, and should include policies which are supportive of increasing the range and mix of housing options within “Villages and Hamlets”.

Further, proposed Schedule C1 of the Draft Official Plan sets out the Town-Wide Transportation Network (see Attachment “B” to this letter). The proposed Schedule C1 should be revised to accommodate for access to the Subject Property and should include the currently unopened Brock Street road allowance as a “Local Road” to facilitate access to the Subject Property considering that access is restricted to Hurontario Street as it is a Provincial Highway.

Moreover, a settlement was reached with the Town and the applications were approved in principle by the Ontario Land Tribunal (“OLT”) regarding a townhouse development proposal on the Subject Property. The proposed Draft Official Plan should reflect the agreed-upon settlement and OLT approval in principle.

Generally, the policies of the proposed Draft Official Plan do not reflect the Town’s commitment to providing more homes to address the ongoing housing crisis within the Province. In addition, we would note that the Province of Ontario has recently released the “Provincial Planning Statement”. This plan reinforces that all municipalities in the Province should be looking at encouraging intensification throughout the built-up area and to achieve complete communities that can provide a variety of choices for living, working and playing throughout an entire lifetime.

We agree that this is an important consideration in any Official Plan, and would encourage the Town to allow a broader and more specific range of residential uses, building types, lot types, and built-forms for the Subject Property, which will make the application of the Official Plan more efficient for the Town.

We would be happy to discuss these comments further with the Town at your convenience. Should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

**Design Plan Services Inc.**



David Igelman, B.U.R.Pl., MCIP, RPP

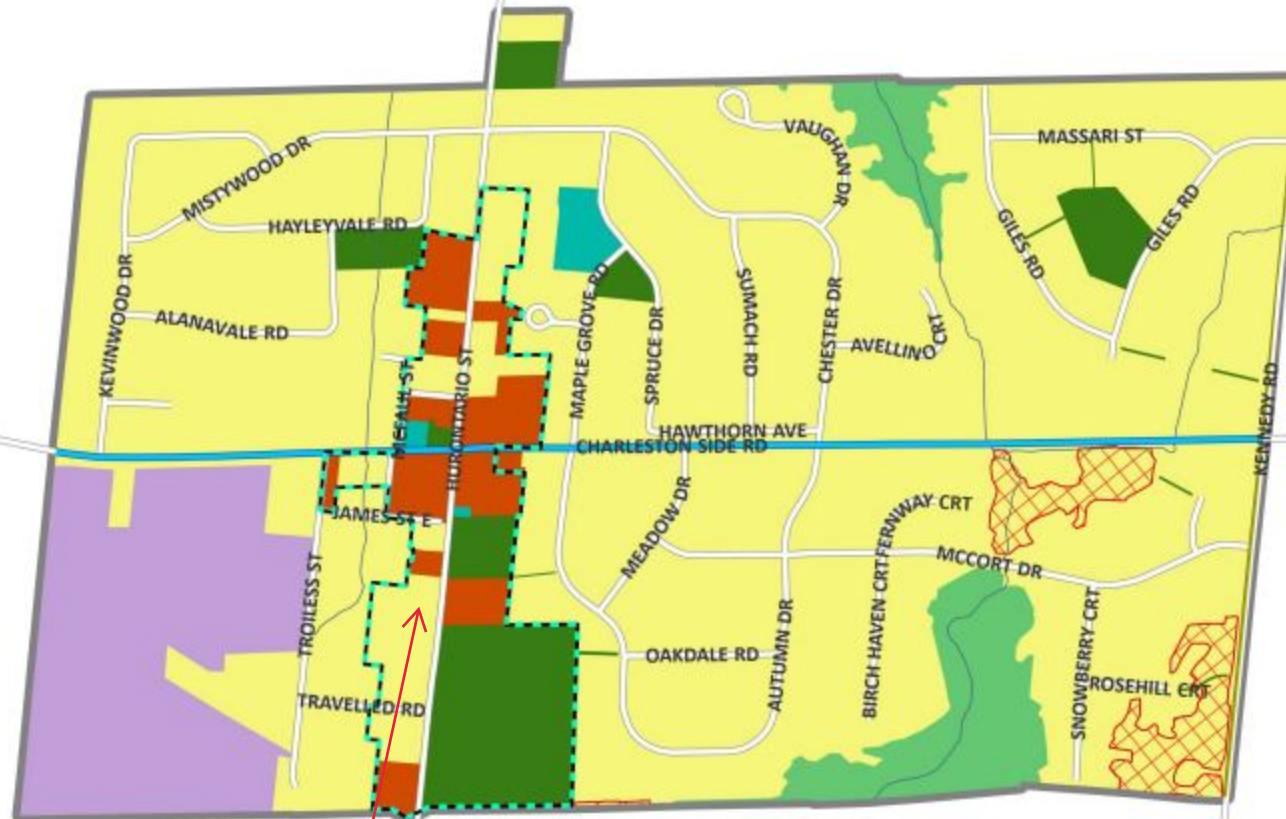
Senior Planner/Project Manager

Encl.

DI

Schedule E4

CALEDON  
VILLAGE



- 26m Right-of-way Width
- 30m Right-of-way Width
- Settlement Area Boundary
- Community Improvement Area
- Natural Environment System**
  - Natural Features and Areas (NFA)
  - Supporting Features and Areas (SFA)
  - Lakes
  - Permanent and Intermittent Streams
- Land Use**
  - Extractive Industrial
  - Institutional
  - Parks and Open Space
  - Rural Commercial
  - Villages and Hamlets

Key Map  
nts





Approximate location of Subject Property.

Schedule C1  
TOWN-WIDE  
Transportation Network

- Future Caledon GO Station
- Brampton/Caledon Airport
- Planned Major Transit Station Area
- Planned Transit Hub Area
- Primary Major Transit Station Area
- Provincial Freeway (MTO)
- Provincial Highway (MTO)
- Regional Arterial
- Town Arterial
- Collector Road
- Conceptual Collector Road
- Local Road
- Active Transportation - Trail System
- Rail
- Urban Area and Settlement Areas
- Highway 413 Transportation Corridor

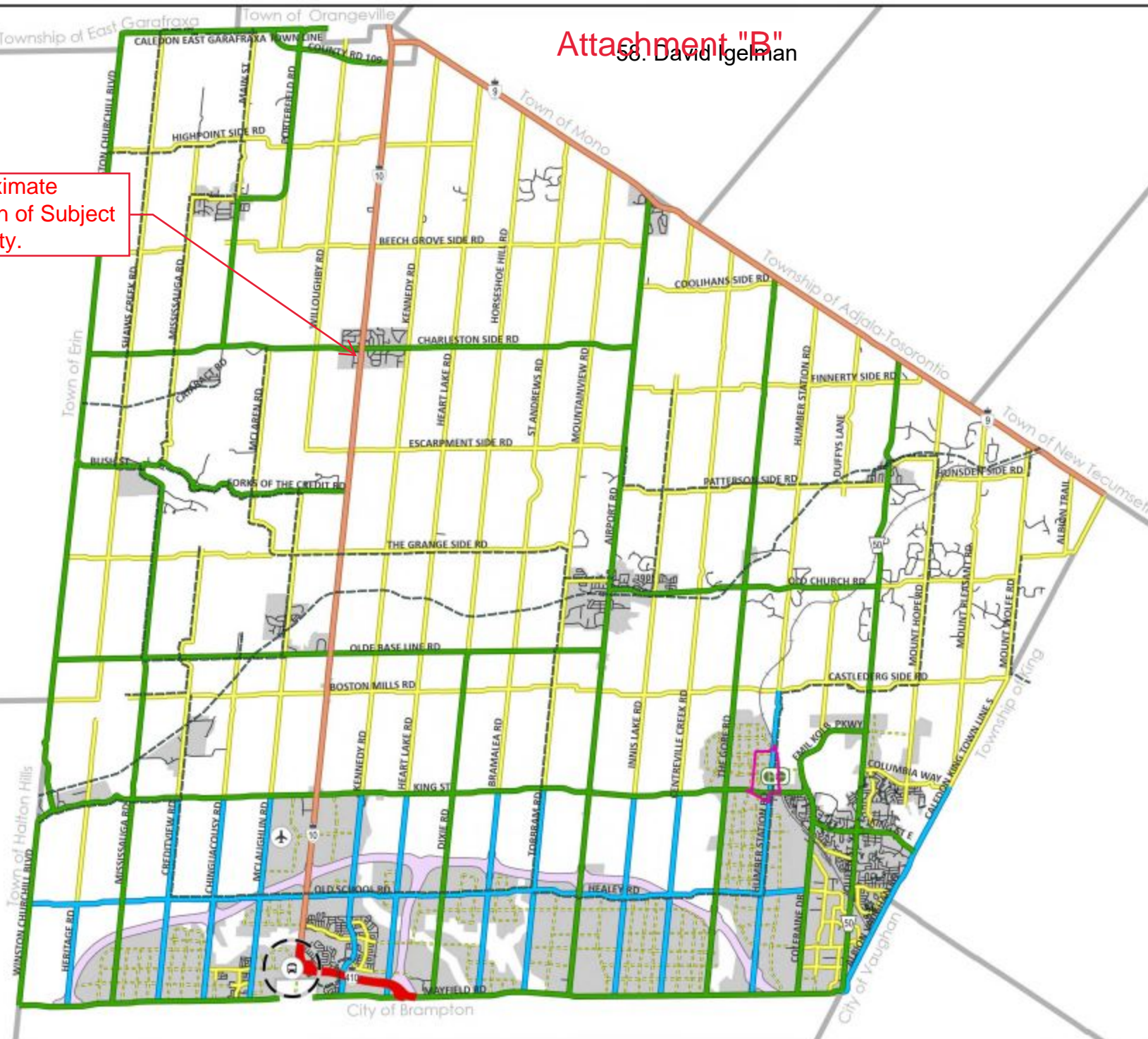


Date of print: 8/24/2023 August 2023

Sources: The Official Plan of the Municipality of Peel  
Contains information under the Open Government Licence - Ontario

This map is part of the Official Plan of the Town of Caledon and must be read in conjunction with the text, B315  
The boundaries/designations on this schedule are approximate and are not intended to be scaled.

**DRAFT**



Mayor Grooves and members of council, I am a resident of the Town of Caledon and am part of the Caledon East Rural Neighbors group.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centers of a certain size. The size of the out buildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles. Why would Council move forward with an OP that makes it easier for these venues to operate within the Town of Caledon when significant time and resources are being spent to shut down these sites? Would it not make sense to strengthen the OP to make it more difficult for these renegade party centres to exist in Caledon?

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event center while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. Without significant penalties for non-compliance the owners will consider fines as a cost of doing business and continue to ignore the directives being provided by the Town of Caledon.

There are 5 such centers within a 4 km radius, and we are sure there are more coming once the financial success of these facilities becomes more well known. These centers avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit. These facilities are disruptive to our rural way of life, impede our ability to enjoy our own properties due to noise and traffic issues, and mock the Town of Caledon's requirements to adhere to basic rules/restrictions/by-laws. There is no common courtesy for neighbours as the music as the MGM runs well into the night and the music is so loud that it can be heard many miles beyond the facility.

These are renegade business owners, with money to spare, who choose to create their own rules and the law abiding neighbours are forced to put up with these blatant refusals to follow the rules. Why are we, tax paying rural residents who do follow the Town of Caledon's rules and bylaws, being subjected to these rampant violations and lack of concern by the owners. In the case of MGM, the owners arbitrarily changed the topography of wetlands and knowingly defied the rules that the previous owners of the property were forced to follow. I know for a fact that the Town of Caledon was constantly insisting on by-law adherence by the previous owner, to the point where she had to expend tens of thousands of dollars to comply or face being shut down. At least she had the decency to consider the impact of her facility on the neighbours; in all the years that she ran the place I cannot recall ever being disturbed by the activities she held at the venue. The current owners could care less about the original restrictions put in place by the Town in order for this facility to operate in line with the rules.

Further, these centers are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Millcroft Inn pay for example, which creates a financial loss for the Town. Again, why are these law abiding, rule following centres being penalized by having events that they are capable and permitted to host, being held at these illegal operations; there are potential financial losses for the compliant facilities.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Council waited far too long to address these trucking depots, despite citizens raising

alarms at the proliferation of truck centres. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. How is this possible? Why was he out of the loop when we know that many councillors have spoken in person to concerned citizens on this topic. Why was Steve Burke now aware of this issue? Unlike the trucking yards, The Town of Caledon must ensure that there is foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income with uses that have positive impacts on neighboring farms and are community friendly.

I hope that Council is listening to the voices of citizens that are experiencing these issues. Be confident, as we are, that without proper oversight and guidance and very clear rules on what these properties can be used for relative to the OFDU, these event centres will continue to proliferate through other parts of Caledon and Council will spend incredible amounts of time, energy and money to address these facilities. All of these resources are likely critical to our future given the decision to split the Region of Peel. Please consider if this is the best use of staff's time and the taxpayer's money and energy dealing with these as they randomly pop up on rural properties. My ask is that you listen to the citizens who are raising these concerns, and do the right thing by ensuring that our rural landscape can remain as pristine and beautiful as it currently is, without the pollutions (food, noise, alcohol, lights, music, etc.) that accompany these facilities.

I am hopeful that Councillors will do the right thing and protect our community from the flagrant abuses of our beautiful villages.\

Thank you,

Debbie Davis

October 2, 2023

Town of Caledon  
6311 Old Church Road  
Caledon, Ontario  
L7C 1J6

Attention: Mr. Patrick Trafford, Acting Town Clerk, and the Official Plan Review Team  
**Sent only by email: [agenda@caledon.ca](mailto:agenda@caledon.ca) and [opreview@caledon.ca](mailto:opreview@caledon.ca)**

Dear Sir:

**Re: Future Caledon Official Plan August 2023 Draft**

These comments with respect to the August 2023 Draft Official Plan have been prepared by Macaulay Shiomi Howson Ltd. with input from Crozier Consulting Engineers. The comments are submitted on behalf of:

- *Argo Macville I Corporation*
- *Argo Macville II Corporation*
- *Argo Macville III Corporation*
- *Argo Humberking Corporation*
- *Argo Macville V Corporation*
- *Argo Humber Station Limited*
- *Argo King Corporation*
- *Argo Summer Valley Limited*
- *Argo Kennedy Limited*
- *Argo Northfields Corporation*
- *Argo Alloa (BT) Corporation*
- *Argo Mayfield West I Limited*
- *Argo Mayfield West II Limited*
- *Argo Mayfield West III Limited*

By copy of this letter to the Town Clerk, we are requesting notice of the decision of the Council of the Corporation of the Town of Caledon on the proposed new Official Plan.

Notice should be sent to the undersigned and Argo Development Corporation - 4900 Palladium Way, Suite 105 Burlington, Ontario L7M 0W7.

The preparation of a new Official Plan is a major undertaking, particularly at a time when so many changes are occurring to factors which form the foundation for future planning of the Town, including Provincial policy and the structure of local government. This uncertainty reinforces the need to develop an official plan which provides broad direction - which is goal oriented not rule based - and ensures the Town has the flexibility to address issues appropriately as they arise. A plan which provides a framework for development but does not prescribe a detailed set of rules for a future which cannot be accurately predicted.

Our comments are presented in that context – identifying proposed policies which will restrict the Town from achieving the best solutions to issues as they arise.

Key concerns we have identified to date are as follows:

<b>Key Concerns</b>		
<b>#</b>	<b>Section</b>	<b>Comment</b>
<b>Part C Town-wide Policies Section 5 Climate Change</b>		
<b>1.</b>	<b>Section 5.4 Green Development Standards</b>	<p><b>Review:</b> The Ontario Building Code (OBC) is really the only mechanism the Town has to establish green development standards. Therefore, it is misleading to state in Section 5.4.1 that the Town “will establish mandatory <i>Green Development Standards (GDS)</i>, to be implemented through the development application requirements in Chapter 27 of this Plan”. The GDS can encourage, as noted in Section 5.4.3, but cannot force compliance with standards that exceed the OBC. There is also limited potential to improve the standards for new development without substantial costs assuming the trades are trained and able to implement the upgraded requirements. These factors must also be balanced against the development of affordable/attainable housing.</p> <p><b>Recommendation:</b> Modifications should be made to Section 5.4 to ensure that it is not misleading. Suggested revised wording (additions shown as underlined deletions as struck out) is:</p> <p>5.4.1 “The Town will establish <u>mandatory</u> <i>Green Development Standards....</i>”</p>



Key Concerns		
#	Section	Comment
		5.4.2 “The Town will establish minimum performance standards <u>which applicants will be encouraged to meet</u> as part of the <i>Green Development Standards</i> process ....”
<b>Part C Town-wide Policies Section 9 Housing</b>		
2.1	<b>Section 9.1 Objectives</b>	<p><b>Review:</b>            Section 9.1 b) establishes an objective for the development of purpose-built rental housing through a minimum target of 25 per cent of all units to be rental in tenure. This reflects direction in the Region’s Official Plan but that direction is for the Region as a whole. It is not appropriate to apply the target, particularly as a minimum, to Caledon which has a very different housing mix and built form than the more urban communities of Brampton and Mississauga. In addition, the construction of rental housing is dependent on a range of factors including rent control legislation and availability of financing. While rental housing is an important component of affordable and attainable housing it is not appropriate to establish such a specific and significant target given the current and planned housing mix in the Town and when many factors are outside the control of both the Town and the developer. A general target for affordable/attainable housing is more achievable. The objective can encourage a focus on the provision of rental housing as part of this general goal.</p> <p><b>Recommendation:</b>            Modifications should be made to Section 9.1 b) to ensure that it reflects the actual potential for rental housing in the Town. Suggested revised wording is:</p> <p>“b) maintain and develop <del>purpose-built rental</del> <u>affordable/attainable</u> housing through a minimum target of <del>25</del> <u>30</u> per cent of all new units <u>and actively encourage purpose built rental housing as a significant proportion of these units with a target of 25% of all affordable/attainable housing</u> <del>to be rental in tenure.</del>”</p>
2.2	<b>Section 9.4 Rental Housing Supply</b>	<p><b>Review</b>            Section 9.4.1 repeats the target of 25 per cent for rental housing.</p>

<b>Key Concerns</b>		
<b>#</b>	<b>Section</b>	<b>Comment</b>
		<p><b>Recommendation:</b> Suggested revised wording is:</p> <p>“To support the diversification of housing tenure, the Town will work with the Region to <del>implement the target that a minimum of 25 per cent of all new housing developments be</del> <u>actively encourage the construction of purpose built rental housing with a target of 25% of the minimum target of 30 per cent affordable/attainable housing units.</u>”</p>
<b>Part C Town-wide Policies Section 10 Public Service Facilities</b>		
<b>3.</b>	<b>Section 10.3 School Sites</b>	<p><b>Review:</b> The policies include some directions related to efficient design and use of land (i.e., direction to co-locate with parks and community services). However, a general direction with respect to efficient use of land should be included.</p> <p><b>Recommendation:</b> Section 10.3.1 should be modified as follows:</p> <p>“<u>School sites should be planned as efficiently as possible to minimize land needs including multi-storey buildings and minimum parking requirements. In addition,</u> schools should be co-located.....”</p>
<b>Part C Town-wide Policies Section 11 Transportation</b>		
<b>4.1</b>	<b>Section 11.3 Road Network</b>	<p><b>Recommendation:</b> The conceptual collector road network outlined on Schedule C1/C2 and Schedule F1 differ and should be reconciled with C1 modified to be consistent with F1.</p>
<b>4.2</b>	<b>Table 11-1 Road Network Classifications</b>	<p><b>Recommendation:</b> Laneway standards should be included in Table.</p>
<b>4.3</b>	<b>Table 11-2 Town Daylight Triangle</b>	<p><b>Recommendation:</b> Clarification required on which collector requirement applies.</p>
<b>4.4</b>	<b>Schedule C1 Town-wide Transportation Network</b>	<p><b>Recommendation:</b> The collector road system is conceptual but may be misleading as it does not reflect natural heritage or other constraints. A review to adjust for major existing known</p>

<b>Key Concerns</b>		
<b>#</b>	<b>Section</b>	<b>Comment</b>
		constraints would be appropriate, including where information is available through draft plan and other development applications.
<b>4.5</b>	<b>Schedule C2 Town-wide Road Right-of- -Way Widths</b>	<p><b>Recommendation:</b> Based on findings within completed transportation impact studies the following road right of ways should be:</p> <ol style="list-style-type: none"> <li>1. Humber Station Road to be 26m or less North of King Street</li> <li>2. Kennedy Road to maintain 26m</li> </ol>
<b>4.6</b>	<b>Schedule C3 Town-wide Transit Network</b>	<p><b>Recommendation:</b> Transit is not shown as extending into lands west of Chinguacousy Road and as a new community additional internal transit should be planned for.</p>
<b>Part D Natural Environment System, Parks and Open Space Section 13 Natural Environment System</b>		
<b>5.0</b>	<b>Section 13.8 Minimum Buffers Table 13-3 Minimum Buffers</b>	<p><b>Review:</b> It is premature to establish minimum buffers without detailed analysis. With the exception of Provincially Significant Wetlands, all minimum buffer requirements should be reduced to 10 metres to be consistent with minimum buffer requirements of the area conservation authorities and other similar jurisdictions.</p> <p><b>Recommendation:</b> That Table 13.-3, Minimum Buffers be modified to establish minimum buffers for all features of 10 metres, which the exception of "<i>Wetland (significant)</i>".</p>
<b>Part D Natural Environment System, Parks and Open Space Section 14 Parks and Open Space</b>		
<b>6.0</b>	<b>Section 14.4 Park Planning and Desing</b>	<p><b>Review:</b> Given the limitations on the land which may be dedicated for parkland, it is critical that a priority be placed on ensuring that such land is available for active outdoor recreation uses and is not utilized for buildings.</p> <p><b>Recommendation:</b> That the following new sentence be added at the end of Section 14.4.1 as follows:</p>

Key Concerns		
#	Section	Comment
		<u>Parks will be comprised of parkland and trails that provide active and/or passive recreational opportunities. The use of parkland for built facilities such as community centres and other buildings for recreation purposes shall be discouraged.</u>
Part F Urban System Section 21 Planning the Urban System		
7.	Sections 21.4.2 and 21.4.3	<p><b>Review:</b>  Section 21.4.2 states that “  A privately initiated secondary plan will not be supported.”</p> <p>Sections 21.4.3 and 21.4.4. reflect this direction.</p> <p>It is not clear why a secondary plan must be Town-led. Many communities permit such studies to be carried out by the applicant(s) in accordance with terms of reference approved by the Town. Given limited Town staff resources organizing and managing such complex studies may not be feasible, particularly if more than one is being undertaken at a time which is anticipated given the forecasted growth and ongoing housing shortage.</p> <p><b>Recommendation:</b>  Section 21.4.2 should be modified to provide the option for a privately initiated secondary plan. Suggested revised wording is:</p> <p>“Privately initiated secondary plans will not be permitted prepared in accordance with terms of reference approved by the Town.”</p> <p>Section 21.4.3 should be revised to reflect the changes to Section 21.4.2 as follows:</p> <p>“Secondary Plans shall be prepared, <del>led and completed by the Town</del> in accordance with the approved growth management and phasing study and the Region of Peel Official Plan. As appropriate, the Town <del>may consider the participation of</del> <u>will work with</u> owners and/or developers in the preparation of <u>Secondary Plans and</u> supporting studies, <del>in accordance with the approved where a Terms of Reference has been completed to guide the secondary plan, and which</del> <u>in accordance with the approved</u> <del>where a Terms of Reference has been completed to guide the secondary plan, and which</del> specify the roles and</p>

<b>Key Concerns</b>		
<b>#</b>	<b>Section</b>	<b>Comment</b>
		<p>responsibilities of the Town and owners, developers and other stakeholders, at the sole discretion of the Town.”</p> <p>Section 21.4.4 should be revised as follows:</p> <p>“Town-initiated &amp; Secondary plans.....”</p>
<b>Part G Implementation Section 24 Official Plan Amendments</b>		
<b>8.</b>	<b>24.1 Official Plan Amendments General</b>	<p><b>Review:</b></p> <p>The wording of the Plan appears to provide no flexibility for interpretation of the requirement for an Official Plan Amendment (OPA). Section 24.1.1 states that</p> <p>“Changes to the text, tables, and numbered figures in Parts A through H of this Plan, or to the accompanying schedules, will require an amendment to the Plan.”</p> <p>This seems to indicate that any change will necessitate an amendment. The direction in Section 24.1.1 is reinforced by Section 1.4, How to Read this Plan, which states that:</p> <p>“The policies of this Plan allow for limited flexibility through interpretation without the need for an official plan amendment.”</p> <p>However, that direction conflicts with the interpretation sections 1.4.5 -1.4.8 which do in fact provide flexibility.</p> <p><b>Recommendation:</b></p> <p>Modifications should be made to the Plan, in particular Section 24.1.1 and 1.4, to clarify that changes to the Plan can be made without an amendment having regard for the direction on interpretation, in particular sections 1.4.5-1.4.8.</p>
<b>9.1</b>	<b>24.1 Official Plan Amendments and 24.3 Secondary Plans</b>	<p><b>Review:</b></p> <p>Section 24.1.4 identifies a list of matters for which the Town may initiate an amendment to the Official Plan. This includes a secondary plan as well as the recommendation of a land use study or policy review. In addition, Section 24.3.1 indicates that an official plan amendment to implement a new secondary plan will be prepared. However, as discussed above, a landowner</p>



Key Concerns		
#	Section	Comment
		<p>should be able to initiate such an amendment, in particular for a secondary plan.</p> <p><b>Recommendation:</b>            Revise Section 24.3.1 to clarify that an official plan amendment for a secondary plan can be initiated by the Town or by landowners. Suggested revised wording is:</p> <p>“An official plan amendment to implement a new secondary plan, <u>initiated by the Town or by a landowner</u>, will be prepared....”</p>
9.2	24.3 Secondary Plans	<p><b>Review:</b>            Section 24.3.2 establishes an extensive list of studies for secondary plans with specific direction as to what a number of the studies will address. There is no recognition that each area will have different issues and that not all the studies will be applicable, or that the terms of reference are the best vehicle to identify the specific requirements for the required studies.</p> <p><b>Recommendation:</b>            The introductory statement for Section 23.4.2 should be modified to recognize that not all studies will be required for each secondary plan, nor will specific directions for each study be required. Suggested revised wording is:</p> <p>“Each secondary plan will be based <u>on technical background studies which address issues specific to the area.</u> The following <u>list of studies and related study directions will be considered by the Town in working with landowners to establish a study program appropriate for each secondary plan area.</u> The studies will be prepared to the satisfaction of the Town in accordance with applicable terms of reference.”</p>
9.3	24.3.2 a) Secondary Plans	<p><b>Review:</b>            Section 24.3.2 a) establishes the requirements for the sub-watershed study which would form the basis for any secondary plan. Unlike the other background studies, it is described as</p> <p>“a Town-led subwatershed study, prepared in accordance with Council-approved terms of reference”.</p>

Key Concerns		
#	Section	Comment
		<p>Section 13.9.3 also references a Town-led subwatershed study.</p> <p>It is not clear why such a study must be Town-led. Many communities permit such studies, like the other secondary plan background studies and the secondary plan itself, to be carried out by the applicant(s) in accordance with terms of reference approved by the Town. Given limited Town staff resources organizing and managing such complex studies may not be feasible, particularly if more than one is being undertaken at a time.</p> <p>In addition, an opportunity should be provided to ensure that any subwatershed study is carried out in the most efficient possible way including merging the study with the required environmental impact study.</p> <p><b>Recommendation:</b> It is recommended that the subwatershed study identified in Section 24.3.2 a) not be required to be Town-led and that it be carried out in the most efficient way including merging the study with an environmental impact study. Suggested revised wording is:</p> <p><u>“a <del>Town-led</del> subwatershed study, prepared in accordance with Council-approved terms of reference approved by the Town, which will be carried out in the most efficient manner possible which may include merging such study with an environmental impact study. A subwatershed study at a minimum includes:”</u></p> <p>It is also recommended that Section 13.8.3 be similarly modified as follows:</p> <p><u>“A <del>Town-led</del> subwatershed is required.....”</u></p>
9.4	24.3.2 d) Secondary Plans	<p><b>Review:</b> Section 24.3.2 d) requires “energy and emissions and climate adaptation studies”. The suggested approaches to be studied:</p> <ul style="list-style-type: none"> <li>• Have been investigated in other jurisdictions and have been established as unworkable both physically, financially, and with respect to what</li> </ul>

Key Concerns		
#	Section	Comment
		<p>can be implemented through the planning process. This includes district energy, switching from gas and other fossil fuels and renewable and distributed energy systems; and,</p> <ul style="list-style-type: none"> <li>• Need to be examined in the context of other studies not on a stand-alone basis. In particular, measures to reduce greenhouse emissions associated with transportation is best examined through the mobility and transportation study; and,</li> <li>• Similarly potential risk and vulnerability to property, infrastructure, public health, natural heritage, and water resources systems due to changing climate conditions and measures to improve community and environmental resiliency is best examined through the sub-watershed study.</li> </ul> <p><b>Recommendation:</b> That Section 24.3.2. d) be modified to indicate that energy and emissions and climate adaptation should be addressed holistically as a basis for the work in all the background studies as appropriate, not as a separate entity. This approach is in conformity with the directions in Section 5 of the OP, Climate Change. In addition, that the approach consider the type of development being planned and what is viable and appropriate for Caledon, and what can be implemented through the planning process. Suggested revised wording is:</p> <p><u>“energy and emissions and climate adaptation studies should be considered a basis for the work in all the other background studies if appropriate including:</u></p> <ul style="list-style-type: none"> <li>i) <del>assess</del> the feasibility.....</li> <li>ii) <del>identify</del> measures....</li> <li>iii) <del>assess</del> the potential....</li> <li>iv) <del>establish a strategy and policy direction measures...</del>”</li> </ul>
10.	24.4 Block Plans	<p><b>Review:</b> The proposed policies state that “If a secondary plan includes the technical level of detail that would be typically included in a block plan, a</p>

<b>Key Concerns</b>		
<b>#</b>	<b>Section</b>	<b>Comment</b>
		<p>separate block planning process may not be required, at the discretion of the Town.”</p> <p>The level of detail required for a secondary plan can be determined by the Town. As recognized in the current proposed policy, too often the block planning process is duplicative and redundant. It adds another layer of process with related costs and delay. Further, block planning, although sometimes applied to greenfield master planned communities, is not recognized nor sanctioned by the Planning Act. As such, its application should only be used in limited circumstances and should never constitute the need for an Amendment to the Official Plan.</p> <p>The policy framework should establish the secondary plan as the sole vehicle for carrying out detailed planning for new development areas. If a block plan is still to be required, it should not require an Official Plan amendment as it must be prepared in conformity with the Secondary Plan.</p> <p><b>Recommendation:</b>            Section 24 should be deleted and any other references to block planning in the Official Plan. The policy framework should establish the secondary plan as the sole vehicle for carrying out detailed planning for new development areas.</p> <p>If a block plan is still to be required, it should not require an Official Plan amendment.</p>
<b>Part G Implementation Section 26.2 Parkland</b>		
<b>11.</b>	<b>Section 26.2 Parkland</b>	<p><b>Review:</b>            Section 26.2.1 establishes a planning objective for parkland of a minimum of 2.7 hectares of active parkland for every 1,000 residents. However, the policy only provides for its achievement through designation as part of the secondary plan process. This seems to put the onus for achievement of this parkland target solely on lands which form part of secondary plans, although the following sections indicate that all development will be</p>

Key Concerns		
#	Section	Comment
		<p>required to provide for parkland dedication or cash-in-lieu.</p> <p><b>Recommendation:</b>            Modify Section 26.2.1 with suggested revised wording:</p> <p>“The Town will designate lands for new parks through the secondary planning process <u>and other development processes including comprehensive development plans, official plan amendments, plans of subdivision and other development approvals</u>, and reduce identified parkland deficiencies, where feasible, in accordance with the Town’s Parks Plan.”</p>

We appreciate the opportunity to review the draft Official Plan and would be pleased to discuss these comments with Town staff.

Yours truly,

MACAULAY SHIOMI HOWSON LTD.



Per: Elizabeth Howson, MCIP, RPP

c.c. Argo Development Corporation





PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

October 2, 2023

**Steve Burke**  
**Manager, Strategic Policy Planning**  
**Town of Caledon**  
6311 Old Church Road,  
Caledon, L7C 1J6

**Bailey Loverock**  
**Team Lead, Official Plan Review/Senior**  
**Planner**  
**Town of Caledon**  
6311 Old Church Road,  
Caledon, L7C 1J6

Delivered via email to:

[Steven.Burke@caledon.ca](mailto:Steven.Burke@caledon.ca)  
[bailey.loverock@caledon.ca](mailto:bailey.loverock@caledon.ca)  
[opreview@caledon.ca](mailto:opreview@caledon.ca)

Dear Mr. Burke and Ms. Loverock:

**RE: Lafarge Canada Inc. Comments on Town of Caledon Third Draft Official Plan (Phase 1)**  
**OUR FILE 95261J**

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Lafarge Canada Inc. (Lafarge), owns and operates a number of sites throughout the Town of Caledon. On behalf of Lafarge, MHBC is pleased to provide preliminary comments on the Town of Caledon's third draft Official Plan dated August 2023 that is available for review as part of Phase 1 of the Town's Official Plan Review process.

It is understood that the draft document available for comment as part of Phase 1 of the Town's Official Plan Review process does not contain aggregate policies as they will be prepared in Phase 2 of the Town's Official Plan Review process. We will be happy to provide comments on the draft policies once the draft aggregate policies are provided for public review so we can review the entire document in a comprehensive and integrated manner.

When the Town prepares the draft aggregate policies for the new Official Plan, Lafarge requests that *associated facilities*, including aggregate recycling (e.g. concrete and asphalt) for mineral aggregate operations as defined in the Provincial Policy Statement, 2020, be incorporated into official plan policies to ensure consistency with the Mineral Aggregate Resource policies in Section 2.5 and the corresponding mineral aggregate definitions of the Provincial Policy Statement, 2020.

Please also consider this Lafarge's written request to be notified of when Phase 2 of the Town's Official Plan Review is available for public review as Lafarge has an interest in reviewing the aggregate policies and mapping portion of the Official Plan update.

61. James Newlands

If you have any questions, Lafarge and MHBC would be happy to discuss our comments further with you. Please do not hesitate to contact our office.

Yours truly,  
**MHBC**

A handwritten signature in black ink, appearing to read 'J Newlands', with a stylized flourish at the end.

James Newlands, HBComm, MSc, MCIP, RPP  
Associate

cc. *Mal Wensierski, Lafarge Canada Inc.*  
*Brian Zeman, MHBC*

September 28, 2023

The Corporation of the Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Attention: Planning Department

*sent via email only*

***Re: Feedback on Future Caledon: Our Official Plan***

To Whom It May Concern:

Dillon Consulting Limited (Dillon) has conducted a review of the August 2023 Draft Future Caledon Official Plan (OP) with respect to natural heritage policies on behalf of Anatolia Capital Corp. and would like to provide the comments summarized within this letter as part of the OP review process.

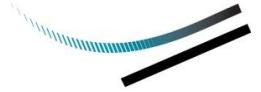
As a result of our review, it was noted that the Draft OP provides more clarity on natural heritage policies, provides improved readability, in part because of the new format. We find that, while similar, the policies related to natural heritage are easier to navigate having defined Natural Feature and Areas and Supporting Features and Areas, versus the previous version that addressed Natural Core Areas, Natural Corridors, Supportive Natural Systems and Natural Linkages. They are also easier to navigate, being included as one comprehensive section (Part D) versus in various sections throughout the OP, as presented in the current OP.

The one specific area that we would like to provide a specific comment on is related to buffers. As the current OP does not specify buffer widths from natural heritage features outside of the Greenbelt Plan Area (Greenbelt) or Oak Ridges Moraine Conservation Plan Area (ORM), the standard was to defer to the Toronto and Region Conservation Authority (TRCA) Living City Policies, 2014 (LCP). However, the Draft OP includes Section 13.8 (Minimum Buffers) that dictates the minimum required natural feature buffers for all areas outside of the Greenbelt or ORM, presented below.

Component of the Natural Environment System	Minimum Buffer
<i>Life Science Areas of Natural and Scientific Interest</i>	15 metres
Valleyland ( <i>significant</i> )	15 metres
Wetland (evaluated as non- Provincially <i>significant</i> )	15 metres
Wetland ( <i>significant</i> )	30 metres
Wildlife habitat ( <i>significant</i> )	15 metres
Woodland ( <i>significant</i> )	20 metres
Woodlands meeting one or more of the criteria for a Natural Areas and Corridors <i>woodland</i> in Table 1 of the Region of Peel Official Plan	15 metres



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It is notable that these minimum buffer widths are greater than what is presented in the LCP (Policy 7.3.1.4), which are as follows:

Natural System Element	Required Buffer Width
Valley or Stream Corridor	10 metres
Woodlands	10 metres
Wetlands (Provincially <i>significant</i> )	30 metres
Wetlands (other wetlands)	10 metres

This is a difference of 10 m for significant woodlands (double the requirement) and an additional 5 m for other features. While it is expected that municipalities move towards more specific environmental policies, there is confusion between this guidance and what is presented in the Region of Peel Environmental Screening and Scoped Subwatershed Study (Wood, 2020).

Section 13.9 of the Draft OP addresses New Community Areas and New Employment Areas as shown of Schedule F1, and refers to the Wood 2020 study. Section 13.9.7 of the Draft OP states that, *based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Heritage System being studied.*

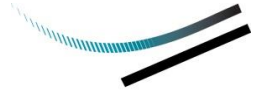
Based on this, it is assumed that the Minimum Buffer Widths presented in 13.8 do not apply in New Community Areas and New Employment Areas, as they are to be established through subwatershed studies. The guidance presented in Part C: Implementation Plan, of the Wood 2020 study further clarifies that “*guidance for the identification of buffers for areas outside of the Greenbelt Plan NHS should be taken from the Living City Policies (TRCA 2014), Regional and Local Municipal policies (as applicable), best practices and current literature, as appropriate. Buffers for features of the NHS will be established through detailed studies (e.g., detailed Subwatershed Study, Secondary Plan, etc.)*”. This might suggest that within New Community Areas and New Employment Areas, the LCP buffer widths could apply (or otherwise determined through best practices), but the policies in section 13.8 of the Draft OP would not apply. However, all areas outside of these areas and outside of the Greenbelt NHS, the policies in section 13.8 of the Draft OP would apply.

It is recommended that the policies related to establishment of buffer widths outside of the Greenbelt and ORM areas be consistent and reflect that of what is presented in the Wood, 2020 study, rather than the specified buffers presented in 13.8 of the Draft

*Town of Caledon, Planning Department*

*Page 3*

*September 28, 2023*



OP. A buffer should be specific to the characteristics and functions of a particular feature, and in consideration of the surrounding landscape. As a result, 15 or 20 m buffers on certain features may not be practical or required from an ecological protection perspective.

Yours sincerely,

**DILLON CONSULTING LIMITED**

Whitney Moore  
Associate



October 2, 2023

GSAI File: 1115-003

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning, and  
Bailey Laverock, Team Lead, Official Plan Review/Senior Planner

**RE: August 2023 Draft Caledon Official Plan  
12600 Bramalea Road (Banty's Roost Golf Course)  
Anatolia Investments Corp.  
Town of Caledon**

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Glen Schnarr & Associates Inc. (GSAI) represents Anatolia Investments Corp., owners of 12600 Bramalea Road (Banty's Roost Golf Course) (herein referred to as the "Subject Lands"). GSAI has been monitoring the Caledon Official Plan process with respect to our client's lands. The Subject Lands are legally described as:

PT LT 21 CON 4 EHS CHINGUACOUSY; PT LT 22 CON 4 EHS CHINGUACOUSY PT 1 & 6,  
43R17182 ; CALEDON

The Subject Lands are 75 hectares (186 acres) in size, bordered by Old School Road to the north and Bramalea Road to the east. The Subject Lands are currently being utilized as a golf course. The Region of Peel Official Plan, approved by the Minister of Municipal Affairs and Housing on November 4, 2022, brought the Subject Lands into the 2051 Urban Area for community uses. Comment letters were previously submitted to Town staff regarding the Official Plan process on behalf of Anatolia Investments Corp. by Weston Consulting, dated April 8, 2022, and February 28, 2022, and by GSAI dated July 24, 2023.

As per the updated draft Town of Caledon Official Plan schedules, the Subject Lands are within "Urban Area and Settlement Areas" on Schedule A1, within "Urban Area" on Schedule B1, within "Designated Greenfield Area" and "Neighbourhood Centre" designations, and adjacent to an "Urban Corridor" (Bramalea Road) on Schedule B2, and within "New Community Area" on Schedule B4. The Subject Lands have frontage on Bramalea Road and Old School Road, which are designated as "Town Arterials" on the draft Transportation Network Schedule C1, and there are future conceptual collector roads shown throughout the Subject Lands, in both north/south and east/west directions.

We would like to note that while we have no objections with the conceptual collector roads on the Subject Lands as per Schedule C1, it should be recognized in the policy text that the locations of these roads are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.



62. Jennifer Staden

**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

Furthermore, in addition to the comments GSAI previously submitted on July 24, 2023, please find our comments on the updated August 2023 draft policy text appended on the following page. We have also appended a letter prepared by Dillon Consulting, dated September 28, 2023, commenting on the NHS draft policies, specifically the proposed buffer widths.

Thank you for the opportunity to provide comments. Please contact the undersigned should you have any questions. We look forward to being involved in the subsequent stages of the Official Plan review.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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**Jennifer Staden, MCIP, RPP**  
**Associate**

cc. *Anatolia Investments Corp.*

62. Jennifer Staden

Policy Number	Policy Text	GSAI comments – July 2023	GSAI Comments – October 2023
Schedule D4b	N/A - Schedule D4b		<p>We understand the Region’s work through the MCR informed these buffers, however blanket 30 metre buffers seems excessive. Appropriate buffers should be determined based on site-specific environmental work. We understand the FSA takeouts are preliminary and to be confirmed through the Secondary Plan process.</p> <p>Please see Dillon letter appended for additional commentary on buffers.</p>
4.2.2	A minimum of 5% of all new residential development will be directed to lands within the <i>delineated built-up area shown on Schedule B2, Delineated Built-up Area</i> , on an annual basis to 2051.	How did the Town land on this percentage? Was there a study completed that supports this percentage and policy directive?	We still do not have an understanding from Town staff where this percentage came from.
4.3.1	“Development within Designated Greenfield Areas, as identified on Schedule B2, Growth Management, will be designed to meet or exceed a density of 67.5 residents and jobs combined per hectare.”	GSAI notes that this density is higher than the minimum density as per the Growth Plan, and while we have no concerns with a higher density, we would like to know how the Town arrived at a density of 67.5 residents and jobs combined per hectare.	Comment in unchanged. We still do not have an understanding from Town staff how they arrived at a density of 67.5 residents and jobs combined per hectare.
4.4.5	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.		This policy implies that the Town initiates every Secondary Plan process. We recommend revising the policy to read: “ <i>When lands are to be made available for development according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan.</i> ”
4.5.1	“When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will	GSAI believes that policies 4.5.1, 4.5.3, and 4.5.4 are too restrictive and contradict the Planning Act.	This policy implies that the Town initiates every Secondary Plan. Perhaps it should read: “ <i>When lands are to be made available for development</i>

## 62. Jennifer Staden

	<p>initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.”</p> <p>REPLACED BY:</p> <p>4.4.5 When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.</p> <p>21.4.1 Development will only be permitted within the <i>Designated Greenfield Area</i> where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.</p>	<p>As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.</p> <p>We suggest this policy be re-worded to the following: “<i>Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated Secondary Plans on a site by site circumstance.</i>”</p> <p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council’s discretion.</p>	<p><i>according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan.”</i></p>
4.5.3	<p>“Privately initiated secondary plans will not be permitted.”</p> <p>REVISED TO:</p> <p>21.4.2 Privately initiated secondary plans will not be supported.</p>		<p>This policy continues to state that privately-initiated Secondary Plans will not be supported. This policy is inflexible and will require an OPA for a proponent-initiated secondary plan. This policy needs to be removed.</p>
4.5.4	<p>“Each secondary planning process will be initiated and led by the Town in accordance with the policies of this Plan, the Region of Peel Official Plan, and terms of reference endorsed by Council. Any participation by landowners and developers, through the preparation of supporting studies, will be at the discretion of the Town and in accordance with the secondary plan terms of reference, which will specify roles and responsibilities.”</p> <p>REVISED TO:</p>		<p>We maintain our previous comments: GSAI believes that policies 21.4.2 and 21.4.3 are too restrictive and contradict the Planning Act. As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.</p> <p>We suggest this policy be re-worded to the following: “<i>Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated Secondary Plans on a site by site circumstance.</i>”</p>

62. Jennifer Staden

	<p>21.4.3 Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.</p>		<p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council's discretion.</p>
4.5.6	<p>"In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the new 2051 Urban Area until after the structure of a connected transportation system is planned to the Region's satisfaction, including:</p> <p>a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and,</p> <p>b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway."</p> <p>REVISED TO:</p> <p>21.4.5 In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the 2051 New Urban Area until after the structure of a connected transportation system is planned to the Region's satisfaction, including:</p> <p>a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and,</p> <p>b) the conceptual alignment of transportation corridors to support travel including goods</p>	<p>GSAI understands this policy to mean that transportation planning, not construction, is needed prior to any Secondary Plan approval. Please confirm.</p>	<p>This policy has been revised to clarify that the transportation system needs to be planned, not built before Secondary Plan approval.</p>



## 62. Jennifer Staden

	movement capacity in recognition of policies in the Region of Peel Official Plan regarding the Highway 413 Transportation Corridor and support for alternatives to a highway.		
4.5.7	<p>“In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.”</p> <p>REVISED TO:  1.4.6 In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.</p>	<p>GSAI believes that there is no basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that the unknown future of the Region creates many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000 additional people a maximum threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>	<p>GSAI maintains the same comments. There is no basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that the unknown future of the Region creates many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000 additional people a maximum threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise</p>
4.6.1	<p>“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:</p> <p>a) Based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken by the Region of Peel, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the Designated Greenfield Area; and,</p> <p>b) The proposed expansion will make available sufficient lands not exceeding the horizon of this Plan based on the analysis provided in the Region’s land needs assessment, while minimizing land consumption;</p> <p>c) The timing of the proposed expansion and the phasing of development within the Designated Greenfield Area will not adversely affect the</p>	<p>Policies 4.6.1, 4.6.2 and 24.1.3 seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and that the PPS enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>	<p>GSAI maintains the same comments. Policies 4.6.1, 4.6.2 and 24.1.3 seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and that the PPS enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>

## 62. Jennifer Staden

	<p>achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,</p> <p>d) The Growth Plan policies on settlement area boundary expansions are satisfied, and”</p> <p>E added: e) The Region of Peel Official Plan policies on settlement area boundary expansions are satisfied.</p>		
4.6.2	“The establishment of new settlement areas is prohibited.”		
24.1.3	“An official plan amendment to allow a settlement area boundary expansion may only be considered as part of a municipal comprehensive review, and in accordance with section 4.6, Settlement Area Boundary Expansions, of this Plan.”		
5.1.(b)	<p>“The planning objectives for climate change mitigation and adaptation are as follows:</p> <p>a) ...</p> <p>b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;”</p>	<p>Policies 5.1(b), 5.4.1 and 9.11.1 cannot be supported without understanding the Town’s Green Development Standards. Is this document completed and endorsed by Council? Using the word “requiring” is too onerous/restrictive. It should be revised to “encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).</p>	<p>GSAI maintains the same comments. Policies 5.1(b), 5.4.1 and 9.11.1 cannot be supported without understanding the Town’s Green Development Standards. Using the word “requiring” is too onerous/restrictive. It should be revised to “encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).</p>
5.4.1	“The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.”		
9.11.1	“The Town will implement a series of Green Development Standards in collaboration with community partners, development groups, and the Region to work towards the climate change objectives outlined in Chapter 5, Climate Change,		

## 62. Jennifer Staden

	of this Plan. All proposed housing developments will subject to review based on these standards.”		
5.2.3	<p>5.2.3 To enhance carbon storage and sequestration, the Town will:</p> <p>a) establish landscaping requirements and promote tree planting to improve air quality and provide shade;</p> <p>b) increase the carbon sequestration potential of parks through tree planting and <i>urban agriculture</i>; and,</p> <p>c) protect agricultural lands within the Rural System, which provide long-term carbon storage benefits; and,</p> <p>d) protect, restore and enhance natural features and areas.</p>		<p>We recommend sub-policy d) be revised to be consistent with the Growth Plan, as follows:</p> <p><i>“maintain, restore, or enhance natural features and areas”.</i></p>
5.3.2	<p>5.3.2 To increase biodiversity, the Town will:</p> <p>a) Protect, <i>restore and enhance</i> existing natural features and areas;</p> <p>b) require native and climate adaptive plant species to be included in landscape plans for municipal parks and open spaces;</p> <p>c) encourage native and climate adaptive plant species to be included in landscape plans for development subject to site plan approval.</p>		<p>We recommend sub-policy a) be revised to be consistent with the Growth Plan, as follows:</p> <p><i>“maintain, restore, or enhance existing natural features and areas”.</i></p>
5.2.4	“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”	Policy 5.2.4 could be problematic if no Terms of Reference are prepared by the Town to review for an alternative and renewable energy systems feasibility study. Furthermore, GSAI believes the word “required” should be replaced with the word “encouraged”.	GSAI maintains the same comments. Policy 5.2.4 could be problematic if no Terms of Reference are prepared by the Town to review for an alternative and renewable energy systems feasibility study. Furthermore, GSAI believes the word

## 62. Jennifer Staden

		We suggest that in every instance where the Official Plan policy refers to a study requirement, the Town should first have in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.	<p>“required” should be replaced with the word “encouraged”.</p> <p>We suggest that in every instance where the Official Plan policy refers to a study requirement, the Town should first have in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p>
5.4	Green Development Standards section	Same concerns as noted above.	GSAI maintains the same comments.
7.1. a)	<p>“...to ensure these new communities and developments will:</p> <p>i) protect natural features and areas as contiguous systems, wherever possible;</p> <p>ii) enhance the resiliency of natural features and areas through buffers and site design;</p> <p>iii) conserve cultural heritage resources in context, wherever possible, and adapt built form to them;</p> <p>iv) integrate existing landforms, uses, landmarks and significant site features; and,</p> <p>v) respect context and important viewshed through setbacks, siting and design.”</p>	Sub-policies ii) through v) should also include the language “wherever possible”.	GSAI maintains the same comments. Sub-policies ii) through v) should also include the language “ <i>wherever possible</i> ”.
7.1.b iv	<p>“To prioritize the long term benefits of growth focused around existing settlement areas, the Town will:</p> <p>iv. apply the highest applicable standards in architecture and landscape architecture”</p>	We request this policy be reviewed to ensure it is consistent with Bill 23, particularly with respect to the delivery of housing and addressing the current housing crisis.	This policy seems to be removed.
7.2.10	“School sites will, where possible, be co-located with other public service facilities, such as parks and community centres, in a manner that supports	GSAI believes this is a positive and supportable policy.	Policy is unchanged.

62. Jennifer Staden

	their development as community hubs, focal points for the community and neighbourhood gathering places.”		
7.7.1	<p>The Town will ensure that the design objectives of this Plan are achieved through the design of new sites and redevelopment of existing sites. Through the Site Plan Control Process, the Town will:</p> <ul style="list-style-type: none"> <li>a) consider individual site elements to improve the aesthetic quality of the development from the <i>public realm</i>, adjacent properties and on the development site;</li> <li>b) ensure safe, comfortable and functional on-site and off-site circulation for all modes of transportation;</li> <li>c) ensure site servicing components are functional, attractive and appropriately screened from view from the <i>public realm</i>. Loading areas, utilities/mechanical equipment, should be located and integrated within a building. Where not feasible, these elements should be directed away and screened from the <i>public realm</i>; and</li> <li>d) where appropriate, particularly in densely populated areas, provide at grade or grade-related public spaces such as plazas, forecourts, and public courtyards; and,</li> <li>e) on larger sites, use existing or create new publicly accessible mid-block pedestrian connections. Mid-block connections should be direct, logical, and continuous to limit the need for added wayfinding measures</li> </ul>	NEW POLICY	We recommend changing the language of c) to “where not feasible, these elements should be directed away OR screened from the public realm.”
7.10	7.10.1 Parking to support new development in <i>strategic growth areas</i> is encouraged to be integrated within buildings, located below grade		We recommend revising 7.10.3 as follows:



62. Jennifer Staden

	<p>and/or in screened structured parking facilities to reduce or eliminate the need for surface parking.</p> <p>7.10.2 Where an above-ground structured parking facility is deemed appropriate by the Town, it should be screened from view from the <i>public realm</i> with façades of high-quality architectural design and landscaping treatments. Street-related uses should be included at grade, where appropriate, to contribute to an active pedestrian realm.</p> <p>7.10.3 Surface parking areas should generally be located at the rear or side of buildings and not between the front of a building and the street.</p> <p>7.10.4 Surface parking areas should incorporate planted landscaped areas that:</p> <ul style="list-style-type: none"> <li>a) clearly define vehicular and pedestrian circulation routes;</li> <li>b) are sufficiently sized to support the growth of trees and other vegetation;</li> <li>c) effectively screen parked vehicles from view from the <i>public realm</i>; and,</li> <li>d) provide shade, wind break, and visual relief from hard surfaces.</li> </ul> <p>7.10.7 Truck and/or trailer parking, staging or loading areas will not be located between the front elevation of a building and a public street and will be screened from the <i>public realm</i>.</p>		<p><i>“Surface parking areas should generally be located at the rear or side of buildings and not between the front of a building and the street, however where not feasible, screened from public view.”</i></p>
7.8.2	<p>“New and infill development will recognize the existing and planned built form context, and reflect the character of the area, buildings and landscapes by respecting and reinforcing:</p>	<p>This policy seems too restrictive. We encourage the policy to be revised to read <i>“New and infill development will recognize the existing and planned</i></p>	<p>This policy seems to be removed. We request Town staff to confirm.</p>

## 62. Jennifer Staden

	<p>a) the height, massing, and scale of nearby buildings;</p> <p>b) the setbacks of buildings from the street;</p> <p>c) existing cultural heritage character and heritage buildings;</p> <p>d) the prevailing side and rear yard setbacks;</p> <p>e) landscaping and open space patterns;</p> <p>f) the size and configuration of lots; and,</p> <p>g) the existing/planned street pattern.”</p>	<i>built form context, and <b>be compatible with the character of the area....”</b></i>	
7.8.3	“New buildings will be designed and oriented to front onto public streets to support a vibrant, active and pedestrian-oriented streetscape. Buildings on corner sites will address the corner and both street frontage.”	This policy does not consider site specific context. Wording should be revised to replace “will be” to “are encouraged to be”.	This policy seems to be removed. We request Town staff to confirm.
7.9.4	“Industrial building surface parking areas will be located in rear yards or well landscaped side yards with screening from public view.”	Policy 7.9.4 should allow opportunity for limited parking on the front yard to ensure appropriate convenience to people utilizing the industrial building. This policy should not outright restrict all parking in front of buildings.	This policy seems to be removed. We request Town staff to confirm.
7.9.9	“A minimum tree canopy cover of 30 per cent will be required for parking lots. The Town will incorporate these targets into its Green Development Standards, Site Plan Controls, and By-laws.”	With respect to policies 7.9.9 and 7.10.2, what is the basis for applying 30% tree canopy to parking lots and site area, respectively?	This policy seems to be removed. We request Town staff to confirm.
7.10.2	“All new developments should contribute to the overall tree canopy of the Town by achieving a minimum 30 per cent canopy coverage on the net developable area of the site, at the discretion of the Town. Canopy coverage is to be assessed as		This policy seems to be removed. We request Town staff to confirm.

## 62. Jennifer Staden

	defined by the Town Wide Design Guidelines and Green Development Standards.”		
9.5.2	<p>Urban System – <b>Corridors and Centres</b></p> <p>a) The greatest <del>heights and residential</del> densities and building heights will be focused <del>around</del> <b>within</b> the Urban and Neighbourhood Centres and along the <b>Urban</b> Corridors <del>as</del> identified in the Town Structure., <del>with built forms</del> Housing options in these areas will include <del>ing multiplexes, multiple-attached dwellings, townhouses, and</del> apartments, and <del>retirement homes, multiplexes, low-rise apartments and multi-tenant housing being encouraged.</del></p>	NEW	GSAI encourages the wording of the policy to revert back to “ <i>around</i> ” Urban and Neighbourhood Centres, as opposed to only “within”.
9.7.3	<p>All additional residential units in existing or new developments are subject to:</p> <p>a)...</p> <p>b) the Town Wide Design Guidelines</p>	NEW	ARUs are intended to provide gentle intensification throughout municipalities. Requiring ARUs to meet the same design standards as primary dwellings seems redundant and overly onerous. This could roadblock gentle intensification projects.
13.8.1	Minimum buffers for woodlands: 15m		<p>GSAI believes 15m minimum buffer is excessive. Typical minimum buffer for woodlands in many jurisdictions is 10 metres and we recommend revising the policy to 10m accordingly.</p> <p>Please see Dillon letter attached for additional commentary on buffers.</p>
13.9.3 and 24.3.2	A Town-led <i>subwatershed</i> study is required to inform the identification and refinement of the Natural Environment System in the New Community Areas and New Employment Areas with the starting point for the more detailed <i>subwatershed</i> study being the findings and recommendations made in the 2020 Peel Environmental Screening and Scoped Subwatershed Study. Some of these recommendations have been incorporated in the		GSAI has concerns with the requirement for a Town-led SWS. The policy should be revised to remove “ <i>Town-led</i> ”.

## 62. Jennifer Staden

	<p>policies below, which will be relied upon when preparing individual <i>subwatershed</i> studies.</p> <p>24.3.2 Each secondary plan will be based on the following studies prepared to the satisfaction of the Town in accordance with all applicable terms of reference: a) a Town-led <i>subwatershed</i> study, prepared in accordance with Council-approved terms of reference, which at a minimum includes:</p>		
14.5.4	<p>The Town may permit a Neighbourhood Park less than 0.8 ha in limited circumstances including neighbourhood inconvenience, an absence of activity opportunities, a shortage of open space alternatives, or where there is a specific urban design or community building objective. In such circumstances, all other provision standards for a Neighbourhood Park should be achieved.</p>		GSAI supports this policy.
14.6.2	<p>“Privately owned publicly accessible spaces contribute to the public realm but remain privately owned and maintained. They do not replace the need for new public parks and open spaces. Privately owned Publicly Accessible Spaces provided through development will:</p> <p>...h) be eligible for parkland credit.”</p>	<p>While we support staff’s position that POPs should be eligible for parkland credit, consistent with Bill 23, we respectfully disagree with this part of the policy: “<i>They do not replace the need for new public parks and open spaces.</i>” POPs can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.</p>	<p>We note this policy is unchanged and we maintain our previous comment. While we support staff’s position that POPs should be eligible for parkland credit, consistent with Bill 23, we respectfully disagree with this part of the policy: “<i>They do not replace the need for new public parks and open spaces.</i>” POPs can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.</p>
21.4.1	<p>Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.</p>		<p>We believe this policy should be revised to allow for site-specific planning applications to be processed in conjunction with the Secondary Plan process, when the Secondary Plan is substantially advanced, in conjunction with the Block Planning process.</p>

## 62. Jennifer Staden

22.4.3	<p>22.4.3 Development Policies</p> <p>f) Buildings as high as 15-20 storeys may be permitted.</p>	<p>We have no questions or concerns regarding this proposed land use designation and support the proposed policies as drafted.</p>	<p>We note the policy has been revised to 15- 20 storeys, which we are in support of.</p>
22.5	<p>“Urban Corridor Designation</p> <p>The Urban Corridor designation is intended to be applied to the lands conceptually shown as Urban Corridors on Schedule B1, Town Structure. Urban Corridors connect neighbourhoods and are mixed-use, mid-rise communities themselves that support quality urban living environments connected to transit services and cycling infrastructure. Urban Corridors will provide a range and mix of activities that meet the needs of residents living within Corridors and also within surrounding neighbourhoods. These corridors are intended to play a major role in providing opportunities for compact forms of development that use land efficiently, provide opportunities for more affordable forms of housing and are transit-supportive. These corridors are anticipated to be approximately 100 metres in depth on either side of the road, and will be characterized by a mixture of primarily high-intensity forms of development, including retail and service commercial uses, offices and residential apartments, as well as community facilities.</p> <p>22.5.1 Objectives The planning objectives for the Urban Corridor designation are as follows:</p> <p>a) facilitate mid-rise forms of development that can allow for more affordable housing, support commercial uses and create opportunities for residents to age in place;</p> <p>b) provide a broad range of neighbourhood-oriented uses, within mixed-use buildings,</p>	<p>We have no questions or concerns regarding this proposed land use designation and support the proposed policies as drafted.</p>	<p>We have no questions or concerns regarding this proposed land use designation and support the proposed policies as drafted.</p>



	<p>providing the community access to daily needs within a convenient walking or cycling trip;</p> <p>c) establish a quality built form that will provide for attractive neighbourhood streetscapes that contribute to neighbourhood vibrancy, character and identity;</p> <p>d) create neighbourhood scale transportation hubs that can integrate multiple modes of transportation and support transit ridership; and</p> <p>e) create street environments that prioritize pedestrians, cyclists and transit users.</p> <p>22.5.2 Permitted Uses</p> <p>A broad range of retail, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses may be permitted. Medium and high density residential uses are also permitted. Ground-related medium density residential uses may be permitted towards the rear of the Urban Corridor.”</p>		
22.5.3	<p>“Development Policies The planned built form characteristics for this designation encourage the development of a wide variety of building forms, generally mid-rise in height, but with higher buildings depending on location. All buildings are intended to have a strong street presence. On this basis, below are the design and built form criteria that will be applied in the Urban Corridors:</p> <p>a) ...</p> <p>b) ...</p> <p>c) Buildings up to 12 storeys may be permitted. Lower building heights and/or greater setbacks</p>	<p>Policy 22.5.3(c) should allow height in Urban Corridors up to 12 storeys. An 8 storey height maximum is too restrictive to recognize future unforeseen market conditions.</p>	<p>We note that this has been revised to 12 storeys which we are in support of.</p>

## 62. Jennifer Staden

	and stepbacks will be required adjacent to existing and planned low rise neighbourhoods.”		
23.4.4	“The Regional Urban Boundary may only be expanded to include Future Strategic Employment Areas only through a Region of Peel Official Plan Amendment and municipal comprehensive review initiated by the Region.”	Policy 23.4.4 is outdated as per Bill 23 since the Region will no longer be involved in their planning function/role. This policy needs to be revised/removed. This would also apply to other policies that speak to involving or relying upon the Region for their planning function.	GSAI maintain our previous comment. Policy 23.4.4 is outdated (as per Bill 23) since the Region will no longer be involved in their planning function/role. This policy needs to be revised/removed. This would also apply to other policies that speak to involving or relying upon the Region for their planning function.
24	Official Plan Amendments	Section 24 should clearly specify where Official Plan Amendments are <u>not</u> required. It speaks to where OPAs are required but not the other way around.	GSAI maintains our previous comment. Section 24 should clearly specify where Official Plan Amendments are <u>not</u> required. It speaks to where OPAs are required but not the other way around.
24.2.3	“An official plan amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site will only be considered as part of an official plan review.”	GSAI disagrees with this policy as the word “significant” is subjective and could be interpreted differently.	GSAI maintains our previous comment. GSAI disagrees with this policy as the word “significant” is subjective and could be interpreted differently.
24.4.1	“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”	This policy is too restrictive and does not provide flexibility for staff to determine if the Block Plan process is appropriately required. We suggest the wording be revised as follows: “ <i>Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town <b>may</b> require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.</i> ”	GSAI maintains our previous comment. This policy is too restrictive and does not provide flexibility for staff to determine if the Block Plan process is appropriately required. We suggest the wording be revised as follows: “ <i>Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town <b>may</b> require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.</i> ”
27.3.2	“All development applications will be evaluated with consideration of the proposed use, the proposed development intensity, and the proposed form of development.”	This policy lists a great deal of criteria including consistency with the PPS, conformity with Provincial Plans and legislation, to changes in privacy and shadowing. Is it expected that all criteria	GSAI maintains our previous comment. This policy lists a great deal of criteria including consistency with the PPS, conformity with Provincial Plans and legislation, to changes in privacy and shadowing. Is it expected that all criteria will be weighted equally

## 62. Jennifer Staden

		will be weighted equally when evaluating development applications? Please advise.	when evaluating development applications? Please advise.
DEFINITIONS	<p>Affordable housing is defined as a residential unit of either rental or ownership tenure wherein the rent or sale price is no greater than 30 per cent of the gross annual household income for low- and moderate-income households.</p> <p>The Town will work toward achieving the Regional goal of 30 per cent of all new housing units meeting this threshold.</p>	NEW DEFINITION	How did the Town land on this definition?
DEFINITIONS	<p><b>Housing assessment</b> a document, which could be a component of a Planning Justification Report, that evaluates how a proposed development will contribute to Peel-wide new housing unit targets shown in Table 4 of the Region of Peel Official Plan and meets the housing policies of this Plan and local municipal official plans. The housing assessment will consider how an appropriate range and mix of housing unit types, densities, sizes, affordability, and tenure will be provided through the development. Local municipalities are required to ensure that the housing assessment is consistent with Regional policies and definitions, including using the most current rental and ownership affordability thresholds.</p>		The Town should consider policies that enable housing developments where affordable housing is not sought/desirable to be excluded from the housing assessment requirement.

September 28, 2023

The Corporation of the Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Attention: Planning Department

*sent via email only*

***Re: Feedback on Future Caledon: Our Official Plan***

To Whom It May Concern:

Dillon Consulting Limited (Dillon) has conducted a review of the August 2023 Draft Future Caledon Official Plan (OP) with respect to natural heritage policies on behalf of Anatolia Capital Corp. and would like to provide the comments summarized within this letter as part of the OP review process.

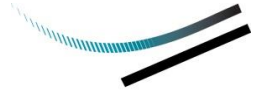
As a result of our review, it was noted that the Draft OP provides more clarity on natural heritage policies, provides improved readability, in part because of the new format. We find that, while similar, the policies related to natural heritage are easier to navigate having defined Natural Feature and Areas and Supporting Features and Areas, versus the previous version that addressed Natural Core Areas, Natural Corridors, Supportive Natural Systems and Natural Linkages. They are also easier to navigate, being included as one comprehensive section (Part D) versus in various sections throughout the OP, as presented in the current OP.

The one specific area that we would like to provide a specific comment on is related to buffers. As the current OP does not specify buffer widths from natural heritage features outside of the Greenbelt Plan Area (Greenbelt) or Oak Ridges Moraine Conservation Plan Area (ORM), the standard was to defer to the Toronto and Region Conservation Authority (TRCA) Living City Policies, 2014 (LCP). However, the Draft OP includes Section 13.8 (Minimum Buffers) that dictates the minimum required natural feature buffers for all areas outside of the Greenbelt or ORM, presented below.

Component of the Natural Environment System	Minimum Buffer
<i>Life Science Areas of Natural and Scientific Interest</i>	15 metres
Valleyland ( <i>significant</i> )	15 metres
Wetland (evaluated as non-Provincially <i>significant</i> )	15 metres
Wetland ( <i>significant</i> )	30 metres
Wildlife habitat ( <i>significant</i> )	15 metres
Woodland ( <i>significant</i> )	20 metres
Woodlands meeting one or more of the criteria for a Natural Areas and Corridors <i>woodland</i> in Table 1 of the Region of Peel Official Plan	15 metres



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It is notable that these minimum buffer widths are greater than what is presented in the LCP (Policy 7.3.1.4), which are as follows:

Natural System Element	Required Buffer Width
Valley or Stream Corridor	10 metres
Woodlands	10 metres
Wetlands (Provincially <i>significant</i> )	30 metres
Wetlands (other wetlands)	10 metres

This is a difference of 10 m for significant woodlands (double the requirement) and an additional 5 m for other features. While it is expected that municipalities move towards more specific environmental policies, there is confusion between this guidance and what is presented in the Region of Peel Environmental Screening and Scoped Subwatershed Study (Wood, 2020).

Section 13.9 of the Draft OP addresses New Community Areas and New Employment Areas as shown of Schedule F1, and refers to the Wood 2020 study. Section 13.9.7 of the Draft OP states that, *based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Heritage System being studied.*

Based on this, it is assumed that the Minimum Buffer Widths presented in 13.8 do not apply in New Community Areas and New Employment Areas, as they are to be established through subwatershed studies. The guidance presented in Part C: Implementation Plan, of the Wood 2020 study further clarifies that “*guidance for the identification of buffers for areas outside of the Greenbelt Plan NHS should be taken from the Living City Policies (TRCA 2014), Regional and Local Municipal policies (as applicable), best practices and current literature, as appropriate. Buffers for features of the NHS will be established through detailed studies (e.g., detailed Subwatershed Study, Secondary Plan, etc.)*”. This might suggest that within New Community Areas and New Employment Areas, the LCP buffer widths could apply (or otherwise determined through best practices), but the policies in section 13.8 of the Draft OP would not apply. However, all areas outside of these areas and outside of the Greenbelt NHS, the policies in section 13.8 of the Draft OP would apply.

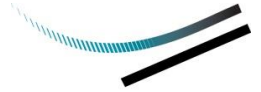
It is recommended that the policies related to establishment of buffer widths outside of the Greenbelt and ORM areas be consistent and reflect that of what is presented in the Wood, 2020 study, rather than the specified buffers presented in 13.8 of the Draft



*Town of Caledon, Planning Department*

*Page 3*

*September 28, 2023*



OP. A buffer should be specific to the characteristics and functions of a particular feature, and in consideration of the surrounding landscape. As a result, 15 or 20 m buffers on certain features may not be practical or required from an ecological protection perspective.

Yours sincerely,

**DILLON CONSULTING LIMITED**

Whitney Moore  
Associate

October 2, 2023

Our File: 1490-007

Town of Caledon  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

Attention: Steve Burke, Manager, Strategic Policy Planning, and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: Future Caledon Official Plan (August 2023 Draft)  
Comments on Behalf of Kennedy King Holdings Inc.  
13306-13320 Kennedy Road  
PT LT 24 CON 1 EHS CHINGUACOUSY**

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Glen Schnarr & Associates Inc. (GSAI) represents Kennedy King Holdings Inc., owners of the property legally described as PT LT 24 CON 1 EHS CHINGUACOUSY PTS 1 & 2 43R17417; CALEDON (herein referred to as the “Subject Property”). The Subject Property is municipally addressed as 13306-13320 Kennedy Road and is situated on the west side of Kennedy Road, north of Old School Road. The Subject Property has an approximate area of 47 hectares (117 acres).

GSAI has been monitoring the Caledon Official Plan review process with respect to our client’s lands and are pleased to submit the following formal comments regarding the August 2023 Draft Future Caledon Official Plan. As per the updated draft schedules, the Subject Property is within the new 2051 Urban Area for “New Employment Area” and “New Community Area”.

Our client wishes to work with the Town of Caledon to strengthen the Town’s commerce and create attainable jobs in support of the anticipated population growth and strong labour force. Our client is willing to invest their effort and financial resources to expedite the creation of industry along the Hurontario Street corridor. In this regard, our client wishes to see the Town’s Official Plan enables development of employment/industrial land that is either ‘service ready’ or ‘easily serviceable’ without setting development phasing of secondary plans. We believe such phasing may detract from having sufficient competitive employment land ready for development in the GTA market area.

Our client emphasizes its request to the Town that the Official Plan not set policies that stage employment development through secondary planning but instead allows employment development that can demonstrate serviceability and can support nearby planned and existing residential community.

In addition to the above, we offer the following comments on the draft policies:

Policy Number	Policy Text	GSAI comments
4.4.5	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.	This policy implies that the Town initiates every Secondary Plan process. We recommend revising the policy to read: <i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan. Notwithstanding that the secondary plan is typically Town-initiated process, the Town may allow proponent initiated secondary plan process with appropriate terms of reference that establishes an appropriate collaboration in efforts with the Town.”</i>
13.3.1 and 13.9.12	The Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System as identified and protected in the Region of Peel Official Plan. The Natural Features and Areas designation is shown on Schedule D1, Natural Environment System, with individual components shown on Schedule D2, Natural and Supporting Features and Areas. The Natural Features and Areas designation includes the following:  a) significant wetlands;	Per Section 13.9.12, it is understood that the Scoped Watershed Study which informed Schedule D4b was based on preliminary, high-level observations and mapping. It is understood further from Section 13.3.1 that the Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System, as identified in the Region of Peel Official Plan. Thus, the Natural Heritage Systems and Key Features illustrated within the Future Caledon Official Plan have

	<p>b) woodlands meeting one or more of the criteria for Core Area woodland on Table 1 of the Region of Peel Official Plan;</p> <p>c) Environmentally Sensitive or Significant Areas;</p> <p>d) Provincial Life Science Areas of Natural and Scientific Interest;</p> <p>e) the Escarpment Natural Area designation of the Niagara Escarpment Plan; and,</p> <p>f) valley and stream corridors meeting one or more of the criteria for Core Area valley and stream corridors in Table 2 of the Region of Peel Official Plan.</p> <p>The 2020 Peel Environmental Screening and Scoped Subwatershed Study was based on preliminary, high-level observations and mapping which did not lead to specific, detailed recommendations for watercourse and headwater drainage feature management. As a consequence, and through the preparation of the required Secondary Plans and subwatershed studies it is expected that all watercourses and headwater drainage features will be reviewed in accordance with the management approach below: a) High-constraint watercourses and their corridors are to be protected in current form and location, with appropriate regulatory setbacks and ecological buffers. Realignments of high constraint watercourses are not permitted. Minor modification through rehabilitation/enhancement may be permitted at select locations where it provides an enhancement to the system, given sufficient rationale. Minor (local) rehabilitation or enhancement could include such works as replacement of perched culverts with new structures that follow Conservation....</p>	<p>primarily been identified at high levels. Recognizing this, we encourage policy that instead provides flexibility for site-specific EIS, initiated at the development application stage, to determine more exact boundaries representative of existing site features and local context.</p>
13.4.7	<p>The presence of Supporting Features and Areas will be screened for by a proponent when an environmental impact study and/or hydrologic evaluation is required to support</p>	<p>We support “Supporting Features and Areas” to be defined through an Environmental Impact Study.</p>

	a development or site alteration application both inside and outside of settlement areas or when a subwatershed study is being undertaken.	
13.4.10	The presence of potential enhancement areas shall be screened for by a proponent when an environmental impact study and/or hydrologic evaluation is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support enhancement areas being defined through an Environmental Impact Study.
13.4.13	Linkages have not been identified on the schedules to this Plan. Opportunities for the establishment of ecologically appropriate linkages shall be screened for when an environmental impact study, hydrologic evaluation, and/or subwatershed study is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support linkages being identified through an Environmental Impact Study.
13.8.1	Minimum buffers for woodlands: 15m	GSAI believes a 15 metre minimum buffer is excessive. Typical minimum buffers for woodlands in many jurisdictions is 10 metres and we recommend revising the policy to 10 metres accordingly.
13.9.2	One of the products of the 2020 Peel Environmental Screening and Scoped Subwatershed Study was the mapping of a preliminary natural heritage system for the New Community Areas and New Employment Areas as shown on Figures D4a, D4b and D4c. The Identification of the preliminary natural heritage system was guided by system-level goals and targets focused on creating a system that takes direction from policy, best practices, and good science and that is robust, resilient and connected.	We understand the Region's work through the MCR informed these buffers, however blanket 30 metre buffers seem excessive. Appropriate buffers should be determined based on site-specific environmental work. We understand the FSA takeouts are preliminary and to be confirmed through the Secondary Plan process.



13.9.7	Based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Environment System being studied.	We are supportive of this policy as it allows for a site-specific review of natural heritage systems at the development application stage. However, more explicit language regarding the modification of <i>Key Feature Buffer (30m)</i> overlays is requested. Policy text should be revised to clearly state that key feature buffer minimums are to be determined through an Environmental Impact Study and that should the EIS recommend a different buffer width, an Amendment to the Official Plan would <u>not</u> be required.
13.9.8	<p>The final buffer width within New Community Areas and New Employment Areas will be determined through an environmental impact study at the development stage when additional information is available to determine the nature of adjacent uses and related impacts on the Natural Environment System and may include additions or deletions to the buffer widths identified through the secondary plan process. When determining the final buffer width, consideration will be given to the following matters:</p> <ul style="list-style-type: none"> <li>a) enhancement and mitigation opportunities such as fencing and vegetative planting within the buffers or on abutting lands;</li> <li>b) the location of passive trails and the location of stormwater management components;</li> <li>c) the intensity of the abutting land uses as illustrated through specific plans for such uses (i.e., grading, setbacks, maintenance, servicing, built form including height, location of buildings and structures and other activities); and,</li> <li>d) the ecological functions, characteristics, significance and sensitivity of the feature the buffer is required from.</li> </ul>	
13.12.2	Changes to the limits or classification of individual features or areas of the Natural	We note and support that the limits and classifications of individual

	Environment System identified <b>may be considered through the submission of an environmental impact study</b> and/or hydrologic evaluation based on terms of reference approved by the Town, in accordance with the policies of this Plan, and in consultation with the Conservation Authority as appropriate. If the change to the limit or classification of an individual feature or component of the Natural Environment System identified can be justified to the satisfaction of the Town, an Amendment to this Plan will not be required.	features or areas may be considered through an environmental impact study and that any changes can be adjusted <u>without</u> an Amendment to the Official Plan.
21.4.1	Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.	We believe this policy should be revised to allow for site-specific planning applications to be processed in conjunction with the Secondary Plan process, and when the Secondary Plan is substantially advanced, in conjunction with the Block Planning process.
21.4.2	Privately initiated secondary plans will not be supported.	This policy continues to state that privately initiated Secondary Plans will not be supported. This policy is inflexible and will require an OPA for a proponent-initiated Secondary Plan. This policy needs to be removed if the vision and intent of the Town is to create a living OP that does not require numerous site-specific OPAs to be filed.
21.4.3	Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has	GSAI believes that policies 21.4.2 and 21.4.3 are too restrictive and contradict the Planning Act. As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.

	<p>been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.</p>	<p>We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated Secondary Plans on a site by site circumstance.”</i></p> <p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council’s discretion.</p>
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We appreciate the ongoing work to prepare this draft Official Plan and the opportunity to provide comment. We kindly request the Town’s thoughtful consideration and look forward to our continued dialogue through the Official Plan Review process. Please feel free to contact the undersigned if you have any questions or require any further information.

Yours truly,

**GLEN SCHNARR & ASSOCIATES INC.**



**Colin Chung, MCIP, RPP**  
**Partner**

October 2, 2023

Our File: 482-005

Town of Caledon  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

Attention: Steve Burke, Manager, Strategic Policy Planning, and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: Future Caledon Official Plan (August 2023 Draft)  
Comments on Behalf of TACC Developments (Armstrong) Ltd.  
Former Armstrong Farm (West Tullamore)  
Southeast Corner of Bramalea Road and Old School Road**

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Glen Schnarr & Associates Inc. (GSAI) represents TACC Developments (Armstrong) Ltd., owners of the former Armstrong Farm, located at the southeast corner of Bramalea Road and Old School Road (herein referred to as the “Subject Lands”). GSAI has been monitoring the Caledon Official Plan review process with respect to out clients’ lands and are pleased to submit the following formal comments regarding the August 2023 Draft Future Caledon Official Plan.

As per the updated draft schedules (August 2023), the Subject Lands are within the new 2051 Urban Area for “New Community Area”, with a proposed “Neighbourhood Centre” at the intersection of Bramalea Road and Old Schol Road and with Bramalea Road proposed as an “Urban Corridor”. We have previously provided comments dated April 4, 2023, regarding our client’s lands and the Tullamore Employment Secondary Plan boundary (see attached). The key points in our April 4<sup>th</sup> letter are as follows:

1. Policy that enables 'proponent-initiated' Secondary Plan or at minimum 'Town-initiated Secondary Plan that collaborates with the affected owner(s) to assist in the preparation of the supporting technical reports/studies' (i.e., a ‘hybrid approach’) in the formulation of the Secondary Plan policies; and,
2. Policy that recognizes the importance of employment growth in Caledon that needs nearby walkable residential neighbourhoods to provide appropriate work/live balance and reduce single occupancy vehicle trips.

In reviewing the latest draft Official Plan, we offer the following comments on the draft policy text:

Policy Number	Policy Text	GSAI comments
4.4.5	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.	This policy implies that the Town initiates every Secondary Plan process. We recommend revising the policy to read: <i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan. Notwithstanding that the secondary plan is typically Town-initiated process, the Town may allow proponent initiated secondary plan process with appropriate terms of reference that establishes an appropriate collaboration in efforts with the Town.”</i>
5.2.3(d)	To enhance carbon storage and sequestration, the Town will: a) establish landscaping requirements and promote tree planting to improve air quality and provide shade; b) increase the carbon sequestration potential of parks through tree planting and urban agriculture; c) protect agricultural lands within the Rural System, which provide long-term carbon storage benefits; and, <b>d) protect, restore and enhance natural features and areas</b>	We recommend sub-policy d) be revised to be consistent with the Growth Plan, as follows: <i>“maintain, restore, or enhance natural features and areas”.</i>
5.3.2(a)	To increase biodiversity, the Town will: <b>a) Protect, restore and enhance existing natural features and areas;</b> b) require native and climate adaptive plant species to be included in landscape plans for municipal parks and open spaces;	We recommend sub-policy a) be revised to be consistent with the Growth Plan, as follows: <i>“maintain, restore, or enhance existing natural features and areas”.</i>



	c) encourage native and climate adaptive plant species to be included in landscape plans for development subject to site plan approval.	
13.3.1 and 13.9.12	<p>The Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System as identified and protected in the Region of Peel Official Plan. The Natural Features and Areas designation is shown on Schedule D1, Natural Environment System, with individual components shown on Schedule D2, Natural and Supporting Features and Areas. The Natural Features and Areas designation includes the following:</p> <ul style="list-style-type: none"> <li>a) significant wetlands;</li> <li>b) woodlands meeting one or more of the criteria for Core Area woodland on Table 1 of the Region of Peel Official Plan;</li> <li>c) Environmentally Sensitive or Significant Areas;</li> <li>d) Provincial Life Science Areas of Natural and Scientific Interest;</li> <li>e) the Escarpment Natural Area designation of the Niagara Escarpment Plan; and,</li> <li>f) valley and stream corridors meeting one or more of the criteria for Core Area valley and stream corridors in Table 2 of the Region of Peel Official Plan.</li> </ul> <p>The 2020 Peel Environmental Screening and Scoped Subwatershed Study was based on preliminary, high-level observations and mapping which did not lead to specific, detailed recommendations for watercourse and headwater drainage feature management. As a consequence, and through the preparation of the required Secondary Plans and subwatershed studies it is expected that all watercourses and headwater drainage features will be reviewed in accordance with the management approach below: a) High-constraint watercourses and their corridors are to be protected in current form and</p>	<p>Per Section 13.9.12, it is understood that the Scoped Watershed Study which informed Schedule D4b was based on preliminary, high-level observations and mapping. It is understood further from Section 13.3.1 that the Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System, as identified in the Region of Peel Official Plan. Thus, the Natural Heritage Systems and Key Features illustrated within the Future Caledon Official Plan have primarily been identified at high levels. Recognizing this, we encourage policy that instead provides flexibility for site-specific EIS, initiated at the development application stage, to determine more exact boundaries representative of existing site features and local context, and that should the EIS recommend a different buffer width, an Amendment to the Official Plan would <u>not</u> be required.</p>

	location, with appropriate regulatory setbacks and ecological buffers. Realignments of high constraint watercourses are not permitted. Minor modification through rehabilitation/enhancement may be permitted at select locations where it provides an enhancement to the system, given sufficient rationale. Minor (local) rehabilitation or enhancement could include such works as replacement of perched culverts with new structures that follow Conservation....	
13.3.7	A proposal for new development or site alteration adjacent to a feature in the Natural Features and Areas designation outside of the Greenbelt and Growth Plan natural heritage systems and outside of the Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan areas will require an environmental impact study and/or hydrologic evaluation to determine that there will be no negative impacts on the feature, ecological function and/or hydrologic function in accordance with the adjacent lands distances outlined in Table 13-1 and prepared to the satisfaction of the Town.	We recommend revising this policy so that adjacent land distances are determined through an Environmental Impact Study, rather than applying blanket minimum distances that have no consideration for local context, and that should the EIS recommend a different distance, an Amendment to the Official Plan would <u>not</u> be required.
13.4.3	A proposal for new development or site alteration adjacent to a feature in the Supporting Features and Areas designation outside of the Greenbelt and Growth Plan natural heritage systems and outside of the Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan areas will require an environmental impact study and/or hydrologic evaluation to determine that there will be no negative impacts on the feature, ecological function and/or hydrologic function in accordance with the adjacent lands distances outlined in Table 13-2 and prepared to the satisfaction of the Town.	As noted above, we recommend revising this policy so that adjacent land distances are determined through an Environmental Impact Study, rather than applying blanket minimum distances that have no consideration for local context, and that should the EIS recommend a different distance, an Amendment to the Official Plan would <u>not</u> be required.
13.4.7	The presence of Supporting Features and Areas will be screened for by a proponent	We support “Supporting Features and Areas” to be defined through the

	when an environmental impact study and/or hydrologic evaluation is required to support a development or site alteration application both inside and outside of settlement areas or when a subwatershed study is being undertaken.	Environmental Impact Study, without the requirement of an Official Plan Amendment.
13.4.10	The presence of potential enhancement areas shall be screened for by a proponent when an environmental impact study and/or hydrologic evaluation is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support enhancement areas being defined through the Environmental Impact Study, without the requirement of an Official Plan Amendment.
13.4.13	Linkages have not been identified on the schedules to this Plan. Opportunities for the establishment of ecologically appropriate linkages shall be screened for when an environmental impact study, hydrologic evaluation, and/or subwatershed study is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support linkages being identified through the Environmental Impact Study, without the requirement of an Official Plan Amendment.
13.8.1	Minimum buffers for woodlands: 15m	GSAI believes a 15 metre minimum buffer is excessive. Typical minimum buffers for woodlands in many jurisdictions is 10 metres and we recommend revising the policy to 10 metres accordingly.
13.9.2	One of the products of the 2020 Peel Environmental Screening and Scoped Subwatershed Study was the mapping of a preliminary natural heritage system for the New Community Areas and New Employment Areas as shown on Figures D4a, D4b and D4c. The Identification of the preliminary natural heritage system was guided by system-level goals and targets focused on creating a system that takes direction from policy, best practices, and	Within Figure D4b, Preliminary NHS Key Features and Key Feature Buffers (30m) are illustrated on the Tullamore lands, southeast of the Bramalea Road and Old School Road intersection. Notably, while these lands are adjacent to Greenbelt lands, certain Key Features and Buffers are identified on lands outside of the Provincial Natural Heritage System.

	good science and that is robust, resilient and connected.	We understand the Region's work through the MCR informed these buffers, however blanket 30 metre buffers seems excessive. Appropriate buffers should be determined based on site-specific environmental work. We understand the FSA takeouts are preliminary and to be confirmed through the Secondary Plan process.
13.9.3	A Town-led <i>subwatershed</i> study is required to inform the identification and refinement of the Natural Environment System in the New Community Areas and New Employment Areas with the starting point for the more detailed <i>subwatershed</i> study being the findings and recommendations made in the 2020 Peel Environmental Screening and Scoped Subwatershed Study. Some of these recommendations have been incorporated in the policies below, which will be relied upon when preparing individual <i>subwatershed</i> studies.	GSAI has concerns with the requirement for a Town-led SWS. The policy should be revised to remove "Town-led". By doing so, the Town is afforded the option of allowing the proponent to assist in the secondary plan process by assisting on the various supporting technical studies to support the secondary plan policy formulation.
13.9.7	Based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Environment System being studied.	We are supportive of this policy as it allows for a site-specific review of Natural Heritage Systems at the development application stage. However, more explicit language regarding the modification of <i>Key Feature Buffer (30m)</i> overlays is requested. Policy text should be revised to clearly state that key feature buffer minimums are to be determined through an Environmental Impact Study and that should the EIS recommend a different buffer width, an Amendment to the Official Plan would <u>not</u> be required.
13.9.8	The final buffer width within New Community Areas and New Employment Areas will be determined through an environmental impact study at the development stage when additional information is available to determine the nature of adjacent uses and related impacts on the Natural Environment System and may	

	<p>include additions or deletions to the buffer widths identified through the secondary plan process. When determining the final buffer width, consideration will be given to the following matters:</p> <ul style="list-style-type: none"> <li>a) enhancement and mitigation opportunities such as fencing and vegetative planting within the buffers or on abutting lands;</li> <li>b) the location of passive trails and the location of stormwater management components;</li> <li>c) the intensity of the abutting land uses as illustrated through specific plans for such uses (i.e., grading, setbacks, maintenance, servicing, built form including height, location of buildings and structures and other activities); and,</li> <li>d) the ecological functions, characteristics, significance and sensitivity of the feature the buffer is required from.</li> </ul>	
13.12.2	<p>Changes to the limits or classification of individual features or areas of the Natural Environment System identified <b>may be considered through the submission of an environmental impact study</b> and/or hydrologic evaluation based on terms of reference approved by the Town, in accordance with the policies of this Plan, and in consultation with the Conservation Authority as appropriate. If the change to the limit or classification of an individual feature or component of the Natural Environment System identified can be justified to the satisfaction of the Town, an Amendment to this Plan will not be required.</p>	<p>We note and support that the limits and classifications of individual features or areas may be considered through an Environmental Impact Study and that any changes can be adjusted <u>without</u> an Amendment to the Official Plan.</p>
24.3.2	<p>Each secondary plan will be based on the following studies prepared to the satisfaction of the Town in accordance with all applicable terms of reference: a) a Town-led <i>subwatershed</i> study, prepared in accordance with Council-approved terms of reference, which at a minimum includes:</p>	<p>GSAI has concerns with the requirement for a Town-led SWS. The policy should be revised to remove “Town-led”.</p>




21.4.1	Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.	We believe this policy should be revised to allow for site-specific planning applications to be processed in conjunction with the Secondary Plan process, and when the Secondary Plan is substantially advanced, in conjunction with the Block Planning process.
21.4.2	Privately initiated secondary plans will not be supported.	This policy continues to state that privately initiated Secondary Plans will not be supported. This policy is inflexible and will require an OPA for a proponent-initiated Secondary Plan. This policy needs to be removed if the vision and intent of the Town is to create a living OP that does not require numerous site-specific OPAs to be filed.
21.4.3	Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.	<p>GSAI believes that policies 21.4.2 and 21.4.3 are too restrictive and contradict the Planning Act. As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.</p> <p>We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated Secondary Plans on a site by site circumstance.”</i></p> <p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council’s discretion.</p>

We appreciate the ongoing work to prepare this draft Official Plan and the opportunity to provide comment. We kindly request the Town's thoughtful consideration and look forward to our continued dialogue through the Official Plan Review process. Please feel free to contact the undersigned if you have any questions or require any further information.

Yours truly,

**GLEN SCHNARR & ASSOCIATES INC.**



**Colin Chung, MCIP, RPP**  
**Partner**

cc: TACC Developments (Armstrong) Ltd.

October 2, 2023

Our File: 1490-006

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Attention: Steve Burke, Manager, Strategic Policy Planning, and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: Future Caledon Official Plan (August 2023 Draft)**  
**Comments on Behalf of Ten King Holding Inc.**  
**PT LT 25 CON 1 WHS CHINGUACOUSY**

---

Glen Schnarr & Associates Inc. represents Ten King Holding Inc., owners of the property legally described as PT LT 25 CON 1 WHS CHINGUACOUSY AS IN VS80277 EXCEPT CH31567, PT 1, 43R12942, PTS 1 & 2, 43R12253; CALEDON (herein referred to as the “Subject Property”). The Subject Property currently has no municipal address. The Subject Property is situated on the west side of Hurontario Street and has an area of approximately 26.8 hectares (66.3 acres). On September 5, 2023, a Preliminary Meeting was held with Town staff, GSAI and our client to discuss our client’s development objectives of building a new warehouse and associated office space on the Subject Property.

GSAI has been monitoring the Caledon Official Plan review process with respect to our client’s lands and are pleased to submit the following formal comments regarding the August 2023 Draft Future Caledon Official Plan. As per the updated draft schedules, the Subject Property is within the new 2051 Urban Area for “New Employment Area”.

Our client wishes to work with the Town to strengthen its commerce and create attainable jobs to support the anticipated growth in population and strong labour force in Caledon. Our client is willing to invest their efforts and financial resources to expedite the creation of industry along the Hurontario Street corridor. In this regard, our client wishes to see the Town’s Official Plan enable development of employment/industrial land that is either ‘service ready’ or ‘easily serviceable’ without setting development phasing of secondary plans. We believe such phasing may detract from having sufficient competitive employment land ready for development in the GTA market area.

Our client emphasizes its request to the Town that the Official Plan not set policies that stage employment development through secondary planning but instead allows employment development that can demonstrate serviceability and can support nearby planned and existing residential community.

In addition to the above, we offer the following comments on the draft policies:

Policy Number	Policy Text	GSAI comments
4.4.5	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.	This policy implies that the Town initiates every Secondary Plan process. We recommend revising the policy to read: <i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan. Notwithstanding that the secondary plan is typically a Town-initiated process, the Town may allow a proponent-initiated secondary plan process with appropriate terms of reference that establishes an appropriate collaboration in efforts with the Town.”</i>
13.3.1 and 13.9.12	The Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System as identified and protected in the Region of Peel Official Plan. The Natural Features and Areas designation is shown on Schedule D1, Natural Environment System, with individual components shown on Schedule D2, Natural and Supporting Features and Areas. The Natural Features and Areas designation includes the following: a) significant wetlands; b) woodlands meeting one or more of the criteria for Core Area woodland on Table 1 of the Region of Peel Official Plan;	Per Section 13.9.12, it is understood that the Scoped Watershed Study which informed Schedule D4b was based on preliminary, high-level observations and mapping. It is understood further from Section 13.3.1 that the Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System, as identified in the Region of Peel Official Plan. Thus, the Natural Heritage Systems and Key Features illustrated within the Future Caledon Official Plan have primarily been identified at high



	<p>c) Environmentally Sensitive or Significant Areas;</p> <p>d) Provincial Life Science Areas of Natural and Scientific Interest;</p> <p>e) the Escarpment Natural Area designation of the Niagara Escarpment Plan; and,</p> <p>f) valley and stream corridors meeting one or more of the criteria for Core Area valley and stream corridors in Table 2 of the Region of Peel Official Plan.</p> <p>The 2020 Peel Environmental Screening and Scoped Subwatershed Study was based on preliminary, high-level observations and mapping which did not lead to specific, detailed recommendations for watercourse and headwater drainage feature management. As a consequence, and through the preparation of the required Secondary Plans and subwatershed studies it is expected that all watercourses and headwater drainage features will be reviewed in accordance with the management approach below:</p> <p>a) High-constraint watercourses and their corridors are to be protected in current form and location, with appropriate regulatory setbacks and ecological buffers. Realignments of high constraint watercourses are not permitted. Minor modification through rehabilitation/enhancement may be permitted at select locations where it provides an enhancement to the system, given sufficient rationale. Minor (local) rehabilitation or enhancement could include such works as replacement of perched culverts with new structures that follow Conservation....</p>	<p>levels. Recognizing this, we encourage policy that instead provides flexibility for site-specific EIS, initiated at the development application stage, to determine more exact boundaries representative of existing site features and local context.</p>
13.4.7	<p>The presence of Supporting Features and Areas will be screened for by a proponent when an environmental impact study and/or hydrologic evaluation is required to support a development or site alteration application both inside and outside of settlement areas or</p>	<p>We support “Supporting Features and Areas” to be defined through the Environmental Impact Study.</p>



	when a subwatershed study is being undertaken.	
13.4.10	The presence of potential enhancement areas shall be screened for by a proponent when an environmental impact study and/or hydrologic evaluation is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support enhancement areas being defined through the Environmental Impact Study.
13.4.13	Linkages have not been identified on the schedules to this Plan. Opportunities for the establishment of ecologically appropriate linkages shall be screened for when an environmental impact study, hydrologic evaluation, and/or subwatershed study is required to support an application for development and site alteration both inside and outside of settlement areas or when a subwatershed study is being undertaken.	We support linkages being identified through the Environmental Impact Study.
13.8.1	Minimum buffers for woodlands: 15m	GSAI believes a 15 metre minimum buffer is excessive. Typical minimum buffer for woodlands in many jurisdictions is 10 metres and we recommend revising the policy to 10 metres accordingly.
13.9.2	One of the products of the 2020 Peel Environmental Screening and Scoped Subwatershed Study was the mapping of a preliminary natural heritage system for the New Community Areas and New Employment Areas as shown on Figures D4a, D4b and D4c. The Identification of the preliminary natural heritage system was guided by system-level goals and targets focused on creating a system that takes direction from policy, best practices, and good science and that is robust, resilient and connected.	We understand the Region's work through the MCR informed these buffers, however blanket 30 metre buffers seem excessive. Appropriate buffers should be determined based on site-specific environmental work. We understand the FSA takeouts are preliminary and to be confirmed through the Secondary Plan process.
13.9.7	Based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum	

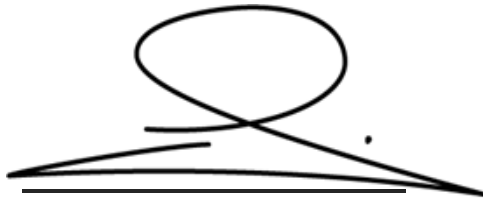
	buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the Natural Environment System and the significance of any of the components of the Natural Environment System being studied.	
13.9.8	<p>The final buffer width within New Community Areas and New Employment Areas will be determined through an environmental impact study at the development stage when additional information is available to determine the nature of adjacent uses and related impacts on the Natural Environment System and may include additions or deletions to the buffer widths identified through the secondary plan process. When determining the final buffer width, consideration will be given to the following matters:</p> <ul style="list-style-type: none"> <li>a) enhancement and mitigation opportunities such as fencing and vegetative planting within the buffers or on abutting lands;</li> <li>b) the location of passive trails and the location of stormwater management components;</li> <li>c) the intensity of the abutting land uses as illustrated through specific plans for such uses (i.e., grading, setbacks, maintenance, servicing, built form including height, location of buildings and structures and other activities); and,</li> <li>d) the ecological functions, characteristics, significance and sensitivity of the feature the buffer is required from.</li> </ul>	<p>We are supportive of this policy as it allows for a site-specific review of natural heritage systems at the development application stage. However, more explicit language regarding the modification of <i>Key Feature Buffer (30m)</i> overlays is requested. Policy text should be revised to clearly state that key feature buffer minimums are to be determined through an Environmental Impact Study and that should the EIS recommend a different buffer width, an Amendment to the Official Plan would <u>not</u> be required.</p>
13.12.2	<p>Changes to the limits or classification of individual features or areas of the Natural Environment System identified <b>may be considered through the submission of an environmental impact study</b> and/or hydrologic evaluation based on terms of reference approved by the Town, in accordance with the policies of this Plan, and in consultation with the Conservation Authority as appropriate. If the change to the limit or classification of an individual feature</p>	<p>We note and support that the limits and classifications of individual features or areas may be considered through an environmental impact study and that any changes can be adjusted <u>without</u> an Amendment to the Official Plan.</p>

	or component of the Natural Environment System identified can be justified to the satisfaction of the Town, an Amendment to this Plan will not be required.	
21.4.1	Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused. Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.	We believe this policy should be revised to allow for site-specific planning applications to be processed in conjunction with the Secondary Plan process, when the Secondary Plan is substantially advanced, in conjunction with the Block Planning process.
21.4.2	Privately initiated secondary plans will not be supported.	This policy continues to state that privately initiated Secondary Plans will not be supported. This policy is inflexible and will require an OPA for a proponent-initiated Secondary Plan. This policy needs to be removed if the vision and intent of the Town is to create a living OP that does not require numerous site-specific OPAs to be filed.
21.4.3	Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.	<p>GSAI believes that policies 21.4.2 and 21.4.3 are too restrictive and contradict the Planning Act. As per the Act, a municipality cannot stop someone from filing a privately initiated Secondary Plan.</p> <p>We suggest this policy be re-worded to the following: <i>“Privately initiated Secondary Plans will generally not be supported, but Council shall make discretion to allow privately initiated Secondary Plans on a site by site circumstance.”</i></p> <p>The revised wording would allow a privately initiated Secondary Plan to proceed without the need for an OPA as per Council’s discretion.</p>

We appreciate the ongoing work to prepare this draft Official Plan and the opportunity to provide comment. We kindly request the Town's thoughtful consideration and look forward to our continued dialogue through the Official Plan Review process. Please feel free to contact the undersigned if you have any questions or require any further information.

Yours truly,

**GLEN SCHNARR & ASSOCIATES INC.**



**Colin Chung, MCIP, RPP**  
**Partner**

cc: Jas Gill, Ten King Holding Inc.

October 2, 2023

Town of Caledon  
6311 Old Church Rd  
Caledon, ON L7C 1J6

Attention: Bailey Loverock, RPP  
Team Lead, Official Plan Review

**Re: Comments on August 2023 Draft Future Caledon Official Plan  
Alloa Landowners Group**

Further to our previous letter dated August 1, 2023, we are pleased to provide updated comments on the August 2023 Draft Future Caledon Official Plan on behalf of the Alloa Landowners Group.

Firstly, we are pleased to see various updates to the Draft Official Plan including increased building height permissions throughout various residential land use designations and broadening the policy language related to the design of multi-storey buildings. In our opinion, the added flexibility provides for a longer lasting policy framework which can adapt to housing market conditions and better respond to future housing needs.

However, we wish to reiterate our request for policies that allow greater participation of landowners and landowner groups in the initiation and advancement of Secondary Plan planning processes. This includes the preparation of background and technical studies (such as the required subwatershed studies) and the opportunity to file a planning application to establish a new Secondary Plan.

With regard to the draft Secondary Plan policies, we maintain that there are several studies identified as Secondary Plan requirements which are more appropriately undertaken at the Block Plan Stage. Notwithstanding, we request that the Town reconsider the need for Block Plans, as it adds an additional planning process which includes matters that can otherwise be dealt with through the Secondary Plan or Draft Plan of Subdivision Stage. Should the need for Block Plans be eliminated, it would then be appropriate to keep the current study requirements as part of the Secondary Plan process.

In addition to the above, we kindly request that the Town review and give due consideration to our updated detailed comments attached herein as Attachment 1.

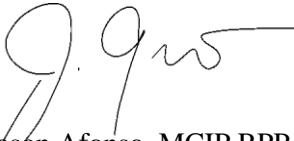
We wish to commend Town staff and Town consultants for their continued hard work on the draft Official Plan and we appreciate being able to participate in the ongoing Official Plan Review process.



Thank you for giving us the opportunity to provide comments on the updated Draft Official Plan.  
Please feel free to contact the undersigned if you have questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Jason Afonso, MCIP RPP  
Partner  
encl.

c. Alloa Landowner Group

Attachment 1 – Comments on August 2023 DRAFT Future Caledon Official Plan

SECTION NO.	POLICY	COMMENT
1.4 How to Read this Plan		
1.4.4	d) Council may approve guidelines or guidance documents that further support the implementation and interpretation of this Plan.	Consideration should be given to allow Guidelines (i.e.. Community Design Plans) to be approved by/at the staff/management level without the need for Council Approval/Endorsement. Guidelines approved at the staff level should carry the same weight as those which may be approved by Council. Consider replacing “Council” with “The Town”.
1.4.7	Minor deviations from numerical requirements in this Plan may be permitted by Council without the need for an official plan amendment, subject to applicable Provincial and Regional policies, provided that the general intent of this Plan is maintained.	It does not make sense to engage Council to determine the extent to which one may deviate from a numerical requirement. The flexibility to deviate without the need for amendment is a matter normally dealt with through consultation with Town staff/management. We recommend managing this matter through the Town's Preliminary Meeting / DART Process. Consider replacing “Town Council” with “the Town” or remove “by Council” altogether.
4. Growth Phasing and Coordination		
4.4.5	When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval.	We request that this policy be revised to state:  <i>“When lands are to be made available for development according to the Growth Management and Phasing Plan, a secondary planning process shall be initiated and approved by Town Council in accordance with the policies of this Plan.”</i>
5. Climate Change		
5.1	The planning objectives for climate change mitigation and adaptation are as follows:  b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofiting of existing building for increased efficiency;	Using the word ‘requiring’ is too onerous/restrictive. We request it be changed to ‘encouraging’ or at minimum, use the same term that is used in the PPS.

5.2.4	The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal <b>renewable</b> energy installation and district and other low carbon energy systems.	<p>With no Terms of Reference is available, this may be problematic. We request, where in each instance the Official Plan refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p> <p>The references to solar and geothermal seem too specific for an OP as it does not allow for new and emerging technologies. We request that the reference to solar and geothermal be replaced with ‘renewable’</p>
5.4.1	The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.	Same as above.
7. Design		
7.2.4(c)	New communities will align new streets in a grid pattern to create pedestrian-scaled development blocks to ensure connectivity and better provide for active transportation;	We request “grid” pattern be revised to “modified grid pattern” to recognize implementation limitations such as intersection spacing requirements on major roads, topography, natural heritage system constraints etc.
8. Economic Opportunities		
8.2.7	Conversions of lands within Employment Areas to non-employment uses such as Major Retail, residential, and other sensitive land uses not ancillary to the primary employment use will not be permitted.	This policy is too restrictive and inconsistent with the PPS on employment land conversions. This policy cannot outright prohibit employment land conversions when the PPS sets out a process to do so.
9. Housing		
9.1	b) maintain and develop purpose-built rental housing through a minimum target of 25 per cent of all new units to be rental in tenure.	This policy can’t be supported without understanding how the Town determined the 25% threshold for requiring purpose built rental units for all new units. We recommend including a policy about how the Town will incentivise and achieve this. We request that the Town emphasize through policy that this is Town-wide and not on a “per site” basis. The OP should speak to where this will be emphasized to achieve the Town-wide target.

66. Jason Afonso

9.2.6	<p>b) To support the diversification of the housing stock, the Town will work with the Region to:</p> <p>i) achieve a target of 50 per cent of all new residential units to be in a form other than single and semi-detached housing in strategic growth areas identified in Part B and Schedule A1 of this Plan;</p>	<p>This policy can't be supported without understanding how the Town determined 50% of all future units to be in the form other than single detached units.</p>
9.4.1	<p>To support the diversification of housing tenure, the Town will work with the Region to implement the target that a minimum of 25 per cent of all new housing developments be purpose built rental housing.</p>	<p>Same as 9.1</p>
9.7.7	<p>b) Low density residential development applications within or abutting strategic growth areas will aim to provide at least 50 per cent of new single, semi-detached and townhouses with occupancy-ready additional residential units in order to contribute to rental housing stock.</p>	<p>This is problematic to implement for semis and townhouses since the 50% threshold cannot be achieved due to the design nature of these units and Town side yard setback requirements. This policy should only apply to singles.</p> <p>Also, what is intended by occupancy-ready? This term should be defined in the Glossary.</p>
<b>11. Transportation</b>		
11.3.7	<p>Table 11-1</p>	<p>8.0-metre Public Lanes should be added to the table.</p>

11.3.15	Table 11-2	<p>Daylight triangle standards are more appropriate within an Engineering Standards document. If the Town insists on including this in the Official Plan, the table should specify where daylight <u>roundings</u> would be required versus daylight <u>triangles</u>. Rear lane intersection daylighting requirements should also be listed. Note there is duplication of the Collector Road to Collector Road standard. Also, we find some of the standards to be excessive for communities which are intended to be compact. Oversized daylight triangles result in excessive side yards for lots abutting the daylight triangle as the triangle consumes a significant amount of lot frontage. This also results in poor built form articulation of the intersection. We request the Town consider the following:</p> <table><tr><th>Intersection</th><th>Land Dedication</th><th>Dimensions</th></tr><tr><td>Public Lane to Local or Collector Road</td><td>Triangle</td><td>2.5 metres by 2.5 metres</td></tr><tr><td>Local Road to Local Road</td><td><u><b>Rounding</b></u></td><td>5 metres by 5 metres</td></tr><tr><td>Local Road to Collector Road</td><td><u><b>Rounding</b></u></td><td>7.5 metres by 7.5 metres</td></tr><tr><td>Collector Road to Collector Road</td><td>Triangle</td><td><b>7.5 metres by 7.5 metres</b></td></tr><tr><td>Local Road to Arterial Road</td><td>Triangle</td><td><b>10 metres by 10 metres</b></td></tr><tr><td>Collector Road to Arterial Road</td><td>Triangle</td><td><b>10 metres by 10 metres</b></td></tr><tr><td>Arterial Road to Arterial Road</td><td>Triangle</td><td>15 metres by 15 metres</td></tr><tr><td>Any Town Road intersecting a Regional Road</td><td>Triangle</td><td>15 metres by 15 metres</td></tr></table>	Intersection	Land Dedication	Dimensions	Public Lane to Local or Collector Road	Triangle	2.5 metres by 2.5 metres	Local Road to Local Road	<u><b>Rounding</b></u>	5 metres by 5 metres	Local Road to Collector Road	<u><b>Rounding</b></u>	7.5 metres by 7.5 metres	Collector Road to Collector Road	Triangle	<b>7.5 metres by 7.5 metres</b>	Local Road to Arterial Road	Triangle	<b>10 metres by 10 metres</b>	Collector Road to Arterial Road	Triangle	<b>10 metres by 10 metres</b>	Arterial Road to Arterial Road	Triangle	15 metres by 15 metres	Any Town Road intersecting a Regional Road	Triangle	15 metres by 15 metres
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11.3.15	<p>The conveyance of daylight triangles having lesser dimensions than specified in Table C2 will only be accepted where the reduce standard is proven to be acceptable to the Town, subject to the criteria in this Plan.</p>	<p>The appropriateness of daylight triangle standards are context sensitive. For example, a standard daylight triangle may suit a sightline and functional road requirement in one instance, but the exact same daylight triangle and road character may not exceed sightline requirements depending on a number of context sensitive reasons such as boulevard design, sidewalk, posted speed, road curvature, active transportation within the roadway. In light of the proposed Table C2 and this policy, we request that the policy be revised as follows:</p> <p><i>The conveyance of daylight triangles having lesser dimensions than specified in Table C2 may be considered based on site context if validated through technical study to the satisfaction of the Town.</i></p>																											



11.3.22	<p>To maintain and protect the traffic capacity of all arterial and collector roadways, the number and location of intersections will be controlled by the Town by:</p> <p>b) Encouraging, where appropriate, reverse frontage for residential lots on arterial roads;</p>	<p>This policy conflicts with Section 7.2.8 which discourages reverse frontage lots. We recommend the Town encourage dual or double frontage lots or window streets where appropriate which provide an attractive streetscape along the arterials road and avoids unsightly fencing / noise walls and long-term maintenance costs for the Town / homeowners.</p>
11.7.2	<p>The Town will ensure adequate off-street parking facilities are provided to meet the parking demand generated by various lands uses. Furthermore:</p> <p>c) Generally, the Town will restrict on-street parking on arterial roads to reduce the traffic hazard and improve traffic operations.</p>	<p>We suggest that the Town consider lay-by parking to support uses which front onto arterial roads. This will help significantly with the Town on-street parking supply issues.</p>
<b>12. Infrastructure</b>		
12.5.4	<p>Unless demonstrated to the satisfaction of the Town, the Region, and the Conservation Authority, stormwater management facilities and/or practices will not be permitted, solely or partially, within the following areas:</p> <p>a) hazardous lands, including flood prone areas, and areas inside the Conservation Authority’s regulated areas;</p>	<p>Regulated areas go beyond NHS features. It is typical to locate SWM ponds within regulated areas provided it is not within a feature. Consider removing reference to “areas inside the Conservation Authority’s regulated areas”.</p>
<b>13. Natural Environment System</b>		
13.8.1	<p>Table 13-3: Minimum Buffers</p>	<p>With the exception of Provincially Significant Wetlands, we request all minimum buffer requirements be reduced to <b>10 metres</b> to be consistent with minimum buffer requirements of the area conservation authorities and other similar jurisdictions.</p>
13.9.3	<p>A Town-led subwatershed study is required to inform the identification and refinement of the Natural Environment System in the New Community Areas and New Employment Areas with the starting point for the more detailed subwatershed study being the findings and recommendations made in the 2020 Peel Environmental Screening and Scoped Subwatershed Study. Some of these recommendations have been incorporated in the policies below, which will be relied upon when preparing individual subwatershed studies.</p>	<p>We request that the Town remove the words “Town-led” in order to allow for the opportunity of a private- or proponent-led subwatershed study.</p>

21.4 Secondary Plans		
21.4.1	<p>Development will only be permitted within the Designated Greenfield Area where an approved secondary plan is in place and the subsequent block plan requirements of this Plan have been satisfied. A complete application will be required to include written confirmation to this effect, or the development application will be refused.</p> <p>Additional direction for secondary plans and block plans is provided in Chapter 24, Official Plan Amendments, of this Plan.</p>	<p>We request that consideration be given to allow applicants to submit development applications while block plans are being advanced as they serve to inform the Block Plan process however, the approval may be withheld until the Block Plan is approved.</p>
21.4.2	<p>21.4.2 Privately initiated secondary plans will not be supported.</p>	<p>We request that the Town reconsider its position on the processing of Secondary Plans and support the option for privately-initiated Secondary Plan OPAs.</p>
21.4.3	<p>Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.</p>	<p>We request that consideration be given to allowing privately-initiated and privately-led secondary planning processes as well as jointly-initiated and jointly-led secondary planning processes with landowners and/or landowner groups. We request that this policy be revised as follows:</p> <p><i>Secondary Plans may be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may also consider privately-initiated and led, or hybrid secondary plan processes. In this case, a Terms of Reference shall be completed to guide the secondary plan, and may specify roles and responsibilities of the applicant.</i></p>
21.4.6	<p>In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.</p>	<p>What is the basis for triggering a 10,000-unit threshold for local transit system planning. With the Region dissolved in the near future, the local transit system will have to be planned by the Town to the Town’s own satisfaction. We request that the policy be revised to state that a Secondary Plan should address how best to accommodate the local transit network as part of the secondary planning exercise.</p>
22.3 Urban Centre Designation		
22.3.4	<p>b) iv) Buildings on corner lots will provide a distinct architectural appearance with building massing and articulation that addresses both streets and creates a comfortable microclimate for pedestrians.</p>	<p>What does this mean? How does an applicant influence a microclimate with architectural appearance and articulation?</p>

	d) ii) Surface parking for medium-density uses may be permitted, provided such parking is generally not located in close proximity to the streetline or in front of main building façades.	This would not allow for street townhouses. We trust this is intended for mid-rise and high-rise buildings. As such, we suggest referencing mid and high rise buildings if applying this policy.
<b>22.4 Neighbourhood Centre Designation</b>		
22.4.3	f) Buildings as high as 15 to 20 storeys may be permitted. Lower building heights and/or greater setbacks and stepbacks will be required adjacent to existing and planned low rise neighbourhoods.	We request the Town consider removing height restrictions within Neighbourhood Centres and allow appropriate height to be determined at the Secondary Plan stage.
<b>22.5 Urban Corridor Designation</b>		
22.5.2	A broad range of retail, service, office, cultural, institutional, educational, hospitality, entertainment, recreational and other related uses may be permitted. Medium and high density residential uses are also permitted. Ground-related medium density residential uses may be permitted towards the rear of the Urban Corridor.	Consider allowing rear-lane ground-related uses along the Urban Corridor.
22.5.3	c) Buildings up to 12 storeys may be permitted. Lower building heights and/or greater setbacks and stepbacks will be required adjacent to existing and planned low rise neighbourhoods.	We request the Town consider removing height restrictions along the Urban Corridor Designation and allow appropriate height to be determined at the Secondary Plan stage.
<b>22.8 Major Commercial / Mixed Use Designation</b>		
22.8.3	d) The minimum height of any new residential building will be 4 storeys and the maximum height will be 12 storeys. The minimum height for non-residential buildings will be two storeys.	Allow for 3-storey residential uses to allow for stacked townhouse housing forms. Allow for 1-storey buildings with 2-storey massing. i.e., Supermarkets. Not every commercial building can be 2 storeys in height. We request the Town consider removing height restrictions within the Major Commercial / Mixed Use Designation and allow appropriate height to be determined at the Secondary Plan stage.
<b>24.3 Official Plan Amendments – Secondary Plans</b>		
24.3.2	<p>Each secondary plan will be based on the following studies prepared to the satisfaction of the Town in accordance with all applicable terms of reference:</p> <p>a) a Town-led subwatershed study, prepared in accordance with Council-approved terms of reference, which at a minimum includes:</p>	We request that the Town remove the words “Town-led” in order to allow for the opportunity of a private- or proponent-led subwatershed study. Also, since Terms of Reference for technical studies aren’t required by the Planning Act to be approved by Council, we respectfully suggest that this and similar references to “Council approved” technical documents be removed from the OP.

66. Jason Afonso

	e) a development staging a sequencing plan	We suggest that it is premature to prepare a development staging a sequencing plan at the Secondary Plan level. A Staging and Sequencing Plan is more appropriate at the Block Plan stage after the Secondary Plan is established and more information is available (i.e., road network, services, swm management) in order to determine how best to stage the development. It would be very difficult to address the list of items required as part of a DSSP until Block Plan level information is available. This requirement should be moved to Section 24.4
	e) vii) allow for the completion of distinct components of new community areas so that the length of time that an area is under construction is minimized, where possible; and,	We request this policy be removed as this is difficult to implement and is contingent on business decisions to proceed with development, and can prolong development progress in other areas that are ready to go.
24.3.3	An official plan amendment for a secondary plan will be supported by a series of urban design, landscape and transportation planning guidelines that will inform the preparation and consideration of implementing development applications.	This policy assumes that a development application is made after the Secondary Plan. Given that the town is now introducing Block Plans, Urban Design, Landscape and Transportation planning guidelines are more appropriately established at the Block Plan stage when a Block Plan Land Use Plan is available for which to base the guidelines. This requirement should be moved to Section 24.4
24.3.4	q) a phasing plan that sets out how each component of the secondary plan area will be phased in a logical manner.	This should be dealt with through the DSSP at the Block Plan Stage. We request that this policy be removed.
<b>24.4 Official Plan Amendments – Block Plans</b>		
24.4.1	Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.	We do not agree that Block Plans should be required, as Block Plan Applications are not recognized nor sanctioned by the Planning Act. As such, its application should only be used in limited circumstances and should never constitute the need for an Amendment to the Official Plan. It is our view that we should adhere to what is required under the Planning Act. As such, we request that this policy be modified or removed accordingly.
24.4.4	The Town will prepare terms of reference for block plans and identify specific study requirements through the pre-consultation process for the required official plan amendment. The costs associated with the studies and the preparation of a block plan will be shared equitably among benefitting landowners on a proportional basis. Benefitting landowners who choose not to participate in the preparation of a block plan but later decide to develop their lands will be required to make a financial contribution to the costs of preparing the block plan based on their proportional share.	We request that an option be provided to approve/establish Block Plans outside of a formal planning application process. It's not clear if it is the Town's intent to undertake the studies and require reimbursement on a cost recovery basis by benefitting landowners. Please clarify.

27.2 Complete Application Submission Requirements		
27.2.5	<p>Exemptions and/or modifications to the complete application requirements of this Plan may be granted by the Director of Planning or designate.</p> <ul style="list-style-type: none"><li>a) Any such exemptions or modifications will be specified in writing during the mandatory preliminary (PARC) meeting.</li><li>a) In considering the appropriateness of any such exemptions or modifications the Director or designate may take into account relevant factors such as:<ul style="list-style-type: none"><li>i) where it has been determined that completion of such studies has occurred for an earlier planning approval;</li><li>ii) where the study requirement would result in an unnecessary duplication of effort; or,</li><li>iii) where the material is not relevant.</li></ul></li></ul>	<p>Consider adding “where the study is considered to be premature in the approval process” to subsection b).</p>

Prepared September 19, 2023



October 2, 2023

GSAI File: 1300-001

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: June 2023 Draft Caledon Official Plan  
Lands West of The Gore Road, North of King Street  
14106 The Gore Road, 14098 The Gore Road and 0 King Street  
Formal Submission on Behalf of Landowners  
Town of Caledon**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Flato Gore Meadows Holdings Inc. and 14106 The Gore Road Inc. who own approximately 53.95 acres collectively over three separate, contiguous parcels on the north side of King Street, west of The Gore Road in Caledon (herein referred to as the ‘Subject Lands’). GSAI has been following the Town of Caledon’s Official Plan review process over the last couple of years on behalf of these owners. Further to comments we submitted on August 23, 2023 in relation to the Town’s June 2023 Draft Official Plan, we are now pleased to be submitting updated comments reflecting the Town’s August 2023 Draft Official Plan.

Within the updated draft Town of Caledon Official Plan schedules, the Subject Lands continue to be within “Urban Area” with a small linear portion shown as “Natural Environment System” on Schedule B1, “Designated Greenfield Area” adjacent to an “Urban Corridor” (King Street) on Schedule B2, and “New Community Area” on Schedule B4. On the draft Transportation Network Schedule C1, King Street continues to be identified as “Regional Arterial” and there appears to be a future conceptual collector road running N/S through the Subject Lands. It is acknowledged that the draft Official Plan policy in the Official Plan indicates that conceptual collector roads shown per Schedule C1 are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.

As a general comment, we wish to comment that the Town’s approach to ‘phasing’ the new 2051 Official Plan is a rather disjointed, confusing approach which will very likely result in inconsistencies and confusion as the public, landowners and stakeholders attempt to understand the applicable planning policies for certain lands, the implications of certain policies (known and unknown), and attempt advance applications. Further, the Town’s Growth Management / Phasing / Sequencing approach has not been clearly explained or outlined and is generally not well understood at all. This is a critical component to the overall Official Plan and while we understand



an update of some sort is expected this Fall, we wish to note that it is extremely difficult to provide comprehensive comments to a partial Official Plan that is presented in this piecemeal fashion.

In this regard, we respectfully request that the Town consider not phasing their Secondary Planning for the 2051 lands and rather, allow proponents the option to initiate Secondary Plan(s) and work with Town staff to include Secondary Plan policies that require and identify any phases that are service-ready and meet the complete community principle.

Alternatively, if the Town insists on advancing a Growth Management / Phasing / Sequencing approach, it is requested that this be revealed in Draft as soon as possible and not before any further iterations of the Town's overall Draft Official Plan be released.

Further, we respectfully request that the Town rethink the entire 'phasing' approach to the Official Plan and provide a more comprehensive document for the public's review, as the next draft iteration. Without this level of detail and comprehensive understanding, it is too difficult to understand the full impact of many of the Town's draft policies and how it is all intended to plan Future Caledon.

Further to our submissions in August 2023 to the June 2023 Draft, we continue to have the following comments on the draft policy text contained in the updated August 2023 Draft Official Plan: \

Policy Number	Policy Text	GSAI comments
4.3.1	<i>"Development within Designated Greenfield Areas, as identified on Schedule B2, Growth Management, will be designed to meet or exceed a density of 67.5 residents and jobs combined per hectare."</i>	This policy has <b>not changed</b> and we continue to notes that this density is higher than the minimum density as per the Growth Plan. Pls advise how the Town arrived at a min density of 67.5 residents and jobs combined per hectare.
4.4.5 (New policy number)	<i>"When lands are to be made available for development according to the Growth Management and Phasing Plan, the Town will initiate a secondary planning process, in accordance with the policies of this Plan, to recommend a secondary plan for approval."</i>	It is suggested that these policies are <b>too restrictive and contradict the Planning Act</b> . As per the Act, privately initiated applications, including for a Secondary Plan, are to be received (i.e. municipality can't refuse receipt of a submission) by a municipality.
21.4.2 (new policy number)	<i>"Privately initiated secondary plans will not be supported."</i>	Policy 21.4.2 is using very negative language when compared to Policy 21.4.3. We suggest Policy 21.4.2 is not necessary.



21.4.3 (new replaces 4.5.4)	<i>“Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.”</i>	<p>The language used in Policy 21.4.3 is more supportive of a possible hybrid approach to secondary planning; we suggest this policy be further amended to allow a full-out privately initiated Secondary Plan process, where deemed appropriate, on a site by site basis.</p> <p>The revised wording would allow for the flexibility of a privately initiated Secondary Plan to be submitted and processed, where appropriate.</p>
21.4.5 (new policy number)	<i>“In accordance with the Region of Peel Official Plan, no secondary plans will be approved in the new 2051 Urban Area until after the structure of a connected transportation system is planned to the Region’s satisfaction, including: a) the conceptual alignment of a transit system that includes an east-west higher order transit corridor; and, b) the conceptual alignment of transportation corridors to support travel including goods movement capacity in recognition of policies in the Region of Peel Official Plan regarding the GTA West Transportation Corridor and support for alternatives to a highway.”</i>	<p>As noted to the June draft, GSAI understands this policy to mean that transportation planning, not construction, is needed prior to any Secondary Plan approval.</p> <p><b>We requested confirmation and have not received it.</b></p>
21.4.6 (new policy number)	<i>“In accordance with the Region of Peel Official Plan, secondary plans in the 2051 New Urban Area will not be approved for more than 10,000 new units until the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.”</i>	<p><b>As noted in our previous comments,</b> we are not clear on the origination/ basis for a 10,000 unit threshold for requiring transit to be established for planning new urban areas. We are concerned that with the unknown future of the Region, there are many uncertainties surrounding transit, and it might end up being planned by the Town. If the Town’s previous population thrived on 81,000 without a transit system, why is 10,000 additional people a maximum</p>



		<p>threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>
4.5.1 (new policy number)	<p><i>“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:</i></p> <p><i>a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken by the Region of Peel, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the Designated Greenfield Area;</i></p> <p><i>b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan based on the analysis provided in the Region’s land needs assessment, while minimizing land consumption;</i></p> <p><i>c) the timing of the proposed expansion and the phasing of development within the Designated Greenfield Area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,</i></p> <p><i>d) the Growth Plan policies on settlement area boundary expansions are satisfied.”</i></p>	<p><b>As noted in our previous comments,</b> Policies 4.5.1, 4.5.3 and 24.1.3 (new numbering) seem inconsistent with Bill 23 and the Provincial Policy Statement. We believe that Bill 23 permits settlement expansion, in some circumstances, to occur outside of MCR and the Provincial Policy Statement enables minor rounding out of settlement boundaries. As these policies are not consistent with Bill 23 or the PPS, we cannot support these.</p>
4.5.3	<p><i>“The establishment of new settlement areas is prohibited.”</i></p>	
24.1.3	<p><i>“An official plan amendment to allow a settlement area boundary expansion may only be considered as part of a municipal comprehensive review, and in accordance with Part B, section 4.5, Settlement Area Boundary Expansions, of this Plan.”</i></p>	



5.1.(b)	<i>“The planning objectives for climate change mitigation and adaptation are as follows: b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;”</i>	<b>As noted in our previous comments,</b> Policies 5.1(b), and 5.4.1 should be softened to refer to ‘encouraging compliance’ (rather than requiring compliance) with the Green Development Standards (GDSs), and removing the word ‘mandatory’ as it relates to the GDSs. These Standards have only recently been released in draft and have yet to be reviewed and commented on, let alone approved.
5.4.1	<i>“The Town will establish mandatory Green Development Standards, to be implemented through the development application requirements in Chapter 27 of this Plan.”</i>	<p>Further, these will be guidelines/standards, not policy, and may be amended from time to time without a full public process. Accordingly, policy in the Official Plan should not <u>require</u> compliance with these standards otherwise the policy would have the effect of entrenching the GDSs into the policy planning framework as a test for new developments, and this is not appropriate, as guidelines or standards can be changed at any time without public consultation.</p> <p>Using language such as “requiring” is too onerous/restrictive. It should change to “encouraging” or at minimum, use the same term in the PPS (“promote/promoting”).</p>
5.2.4	<i>“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”</i>	<p><b>As noted in our previous comments,</b> release of a Terms of Reference document by the Town for this type of study is essential before we can offer support for this policy. In fact, it is suggested that in every instance where the Official Plan policy refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p> <p>Furthermore, the word “required” should be replaced with the word “encouraged”.</p>





5.4	Green Development Standards section	<p><b>As noted in our previous comments</b>, same concerns as noted above. Language such as ‘encourage’ or ‘promote’ are supported, rather than ‘require’ (which can prove too onerous or restrictive) as it relates to these Standards.</p> <p>The GDSs should not be treated as a test for the proponent but a working document for the Town and the development industry to use as a reference for achieving sustainability.</p>
9.1(b)	<i>“The planning objectives for housing, in collaboration with the Region, are as follows: b) maintain and develop purpose-built rental housing through a minimum target of 25 per cent of all new units to be rental in tenure.”</i>	<p><b>As noted in our previous comments</b>, please provide details related to how the Town determined the 25% threshold purpose built rental units for all new units.</p>
9.4.1	<i>“To support the diversification of housing tenure, the Town will work with the Region to implement the target that a minimum of 25 per cent of all new housing developments be purpose built rental housing.”</i>	
9.4.3	<i>“The conversion of rental housing to condominium or ownership tenure that would result in the loss of six or more rental housing units will not be permitted unless: a) at least the same number, size, affordability and type of rental housing units are replaced and maintained with rents like those in effect at the time the development, redevelopment, or conversion application was made; b) an acceptable tenant relocation and assistance plan addressing the right to return to occupy one of the replacement units at similar rents, the provision of alternative accommodation at similar rents, and other assistance to lessen hardship; or,</i>	<p><b>As noted in our previous comments</b>, language used in this policy should be softened to ‘not encourage’ conversion unless the criteria are met (rather than to ‘not permit’). It is not feasible to expect that the replacement of rental housing through condo conversions will always meet these criteria. These are good goals to strive for, but should be not be absolutes.</p> <p>It should be recognized that there may be merit in providing affordable ownership housing without replacing the lost rental housing units. Also, this policy does not recognize that ownership conversion will also facilitate supply of 2<sup>nd</sup> dwelling units.</p>



	c) the overall rental vacancy rate for the Town (or the Region of Peel if data is not available for the Town), as reported by the Canada Mortgage and Housing Corporation, has been at or above 3.0 per cent for the preceding four consecutive annual surveys.”	
9.7.7(b) (new policy number)	“9.9.6 <i>Urban Residential Properties</i> <i>b) Low density residential development applications within or abutting strategic growth areas will aim to provide at least 50 per cent of new single, semi-detached and townhouses with occupancy-ready additional residential units in order to contribute to rental housing stock.</i> ”	Policy 9.7.7.b) is challenging to implement on semi-detached units and townhouses since 50% threshold cannot be achieved due to the design nature of these units and the Town side yard setback requirements. This policy should only apply to single detached units.
14.6.2	“Privately owned publicly accessible spaces provided through development will: <i>(h) be eligible for parkland credit.</i> ” .....	We note this policy <b>has removed reference that POPs should be eligible for parkland credit</b> (previously cited as sub-section (h). We supported this perspective and request it be reinserted into the Official Plan. POPs can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.
22.5.3	“Urban Corridors Development Policies - The planned built form characteristics for this designation encourage the development of a wide variety of building forms, generally mid-rise in height, but with higher buildings depending on location. All buildings are intended to have a strong street presence. On this basis, below are the design and built form criteria that will be applied in the Urban Corridors: c) Buildings up to 8 storeys may be permitted.”	<b>As noted in our previous comments,</b> Policy 22.5.3(c) should allow more height in Urban Corridors (consider up to 12 storeys or perhaps no limit) since 8 storeys is too restrictive to recognize future unforeseen market conditions.
23.4.4	“The Regional Urban Boundary may only be expanded to include Future Strategic Employment Areas only through a Region of Peel Official Plan Amendment and municipal	<b>As noted in our previous comments,</b> Policy 23.4.4 is outdated as per Bill 23 since the Region will no longer be involved in the planning function/role, thus this policy needs to be



	comprehensive review initiated by the Region.”	revised/removed. This would also apply to other policies that speak to involving or relying upon the Region on the planning function.
24	Official Plan Amendments	<b>As noted in our previous comments,</b> Section 24 should clearly specify where Official Plan Amendments are <u>not</u> required. It speaks to where OPAs are required but not the other way around.
24.2.3	<i>“An official plan amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site will only be considered as part of an official plan review.”</i>	<b>As noted in our previous comments,</b> implementation of this policy is not clear as the word “significant” is subjective and could be interpreted differently.
24.4.1	<i>“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”</i>	<p><b>As we have noted previously,</b> this policy is too restrictive and does not provide flexibility for staff to determine if a Block Plan process is appropriately required. We suggest the wording be revised as follows:  <i>“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town <b>may</b> require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”</i></p> <p>Further, opportunity should be provided for a Secondary Plan and a Block Plan to advance concurrently. It seems very time consuming and inefficient to advance an entire Secondary Plan through an OPA, only to turn around and undertake another, separate OPA for the Block Plan.</p>
Definitions (new)	<i><b>Affordable housing</b> is defined as a residential unit of either rental or ownership tenure wherein the rent or sale price is no greater than 30 per cent of the gross annual household income for low- and moderate-income households.</i>	Clarity is requested on how this definition was developed.



	<i>The Town will work toward achieving the Regional goal of 30 per cent of all new housing units meeting this threshold.</i>	
Definitions (new)	<i><b>Housing assessment</b> - a document, which could be a component of a Planning Justification Report, that evaluates how a proposed development will contribute to Peel-wide new housing unit targets shown in Table 4 of the Region of Peel Official Plan and meets the housing policies of this Plan and local municipal official plans. The housing assessment will consider how an appropriate range and mix of housing unit types, densities, sizes, affordability, and tenure will be provided through the development. Local municipalities are required to ensure that the housing assessment is consistent with Regional policies and definitions, including using the most current rental and ownership affordability thresholds.</i>	The Town should consider policies that enable housing developments where affordable housing is not sought/desirable to be excluded from the housing assessment requirement.



Thank you for the opportunity to provide comments. Please contact the undersigned should you have any questions. We look forward to being involved in the subsequent stages of the Official Plan review.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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**Karen Bennett, MCIP, RPP**  
**Partner**

cc. *Flato Gore Meadows Holdings Inc.*  
*14106 The Gore Road Inc.*



October 2, 2023, 2023

GSAI File: 786-004

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

**Attention:** Steve Burke, Manager, Strategic Policy Planning and  
Bailey Loverock, Team Lead, Official Plan Review/Senior Planner

**RE: AUGUST 2023 Draft Caledon Official Plan  
Lands West of Humber Station Road, South of King Street  
Part of Lot 9, Concession 4, ALB  
(within Bolton Option 4 Area per BRES)  
Formal Submission on Behalf of Landowners  
Town of Caledon**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing Gold Humber Station Inc. who own approximately 50 acres located on the west side of Humber Station Road, south of King Street in Caledon (herein referred to as the 'Subject Lands'). GSAI has been following the Town of Caledon's Official Plan review process over the last couple of years on behalf of these owners. Further to comments we submitted on August 23, 2023 in relation to the Town's June 2023 Draft Official Plan, we are now pleased to be submitting updated comments reflecting the Town's August 2023 Draft Official Plan.

Within the August 2023 updated draft Town of Caledon Official Plan schedules, the Subject Lands continue to be within "Urban Area" on Schedule B1, "Designated Greenfield Area" adjacent to an "Knowledge and Innovation Corridor" (Humber Station Road) and "Urban Corridor" (new road to be west of Humber Station Rd) on Schedule B2, and "New Community Area" on Schedule B4. On the draft Transportation Network Schedule C1, Humber Station Road continues to be shown as "Town Arterial" and there continues to be a future conceptual collector road network shown within the Subject Lands, with a new collector road running N/S through the Subject Lands. It is acknowledged that the draft Official Plan policy in the Official Plan indicates that conceptual collector roads shown per Schedule C1 are only conceptual and the final configuration and alignment will be determined through the Official Plan Amendment and/or Block Plan process.

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		<p>threshold?</p> <p>We suggest this policy be deleted and instead include policies stating that the Secondary Plan should address how to best accommodate the local transit network as part of the Secondary Plan exercise.</p>
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5.1.(b)	<i>“The planning objectives for climate change mitigation and adaptation are as follows: b) support climate change mitigation by requiring new residential, employment and commercial buildings to meet the Town’s Green Development Standards and encouraging the retrofitting of existing building for increased efficiency;”</i>	<b>As noted in our previous comments,</b> Policies 5.1(b), and 5.4.1 should be softened to refer to ‘encouraging compliance’ (rather than requiring compliance) with the Green Development Standards (GDSs), and removing the word ‘mandatory’ as it relates to the GDSs. These Standards have only recently been released in draft and have yet to be reviewed and commented on, let alone approved.
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5.2.4	<i>“The Town will require all major development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including the consideration of solar and geothermal energy installation and district and other low carbon energy systems.”</i>	<p><b>As noted in our previous comments,</b> release of a Terms of Reference document by the Town for this type of study is essential before we can offer support for this policy. In fact, it is suggested that in every instance where the Official Plan policy refers to a study requirement, that the Town has in place the Terms of Reference for that study before the Official Plan is finalized and approved by Council. It is difficult to assess how feasible the policy is without knowing what is required through these studies.</p> <p>Furthermore, the word “required” should be replaced with the word “encouraged”.</p>





5.4	Green Development Standards section	<p><b>As noted in our previous comments</b>, same concerns as noted above. Language such as ‘encourage’ or ‘promote’ are supported, rather than ‘require’ (which can prove too onerous or restrictive) as it relates to these Standards.</p> <p>The GDSs should not be treated as a test for the proponent but a working document for the Town and the development industry to use as a reference for achieving sustainability.</p>
9.1(b)	<p><i>“The planning objectives for housing, in collaboration with the Region, are as follows:</i></p> <p><i>b) maintain and develop purpose-built rental housing through a minimum target of 25 per cent of all new units to be rental in tenure.”</i></p>	<p><b>As noted in our previous comments</b>, please provide details related to how the Town determined the 25% threshold purpose built rental units for all new units.</p>
9.4.1	<p><i>“To support the diversification of housing tenure, the Town will work with the Region to implement the target that a minimum of 25 per cent of all new housing developments be purpose built rental housing.”</i></p>	
9.4.3	<p><i>“The conversion of rental housing to condominium or ownership tenure that would result in the loss of six or more rental housing units will not be permitted unless: a) at least the same number, size, affordability and type of rental housing units are replaced and maintained with rents like those in effect at the time the development, redevelopment, or conversion application was made; b) an acceptable tenant relocation and assistance plan addressing the right to return to occupy one of the replacement units at similar rents, the provision of alternative accommodation at similar rents, and other assistance to lessen hardship; or,</i></p>	<p><b>As noted in our previous comments</b>, language used in this policy should be softened to ‘not encourage’ conversion unless the criteria are met (rather than to ‘not permit’). It is not feasible to expect that the replacement of rental housing through condo conversions will always meet these criteria. These are good goals to strive for, but should be not be absolutes.</p> <p>It should be recognized that there may be merit in providing affordable ownership housing without replacing the lost rental housing units. Also, this policy does not recognize that ownership conversion will also facilitate supply of 2<sup>nd</sup> dwelling units.</p>



	c) the overall rental vacancy rate for the Town (or the Region of Peel if data is not available for the Town), as reported by the Canada Mortgage and Housing Corporation, has been at or above 3.0 per cent for the preceding four consecutive annual surveys.”	
9.7.7(b) (new policy number)	“9.9.6 <i>Urban Residential Properties</i> <i>b) Low density residential development applications within or abutting strategic growth areas will aim to provide at least 50 per cent of new single, semi-detached and townhouses with occupancy-ready additional residential units in order to contribute to rental housing stock.</i> ”	Policy 9.7.7.b) is challenging to implement on semi-detached units and townhouses since 50% threshold cannot be achieved due to the design nature of these units and the Town side yard setback requirements. This policy should only apply to single detached units.
14.6.2	“Privately owned publicly accessible spaces provided through development will: <i>(h) be eligible for parkland credit.</i> ” .....	We note this policy <b>has removed reference that POPs should be eligible for parkland credit</b> (previously cited as sub-section (h). We supported this perspective and request it be reinserted into the Official Plan. POPs can achieve the same benefits as public parkland and in some instances, are more appropriate for the local context.
22.5.3	“Urban Corridors Development Policies - The planned built form characteristics for this designation encourage the development of a wide variety of building forms, generally mid-rise in height, but with higher buildings depending on location. All buildings are intended to have a strong street presence. On this basis, below are the design and built form criteria that will be applied in the Urban Corridors: c) Buildings up to 8 storeys may be permitted.”	<b>As noted in our previous comments,</b> Policy 22.5.3(c) should allow more height in Urban Corridors (consider up to 12 storeys or perhaps no limit) since 8 storeys is too restrictive to recognize future unforeseen market conditions.
23.4.4	“The Regional Urban Boundary may only be expanded to include Future Strategic Employment Areas only through a Region of Peel Official Plan Amendment and municipal	<b>As noted in our previous comments,</b> Policy 23.4.4 is outdated as per Bill 23 since the Region will no longer be involved in the planning function/role, thus this policy needs to be



	comprehensive review initiated by the Region.”	revised/removed. This would also apply to other policies that speak to involving or relying upon the Region on the planning function.
24	Official Plan Amendments	<b>As noted in our previous comments,</b> Section 24 should clearly specify where Official Plan Amendments are <u>not</u> required. It speaks to where OPAs are required but not the other way around.
24.2.3	<i>“An official plan amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site will only be considered as part of an official plan review.”</i>	<b>As noted in our previous comments,</b> implementation of this policy is not clear as the word “significant” is subjective and could be interpreted differently.
24.4.1	<i>“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”</i>	<p><b>As we have noted previously,</b> this policy is too restrictive and does not provide flexibility for staff to determine if a Block Plan process is appropriately required. We suggest the wording be revised as follows:</p> <p><i>“Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town <b>may</b> require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable secondary plan will be implemented and establish a context for coordinated development.”</i></p> <p>Further, opportunity should be provided for a Secondary Plan and a Block Plan to advance concurrently. It seems very time consuming and inefficient to advance an entire Secondary Plan through an OPA, only to turn around and undertake another, separate OPA for the Block Plan.</p>
Definitions (new)	<i><b>Affordable housing</b> is defined as a residential unit of either rental or ownership tenure wherein the rent or sale price is no greater than 30 per cent of the gross annual household income for low- and moderate-income households.</i>	Clarity is requested on how this definition was developed.



	<i>The Town will work toward achieving the Regional goal of 30 per cent of all new housing units meeting this threshold.</i>	
Definitions (new)	<b><i>Housing assessment</i></b> - a document, which could be a component of a Planning Justification Report, that evaluates how a proposed development will contribute to Peel-wide new housing unit targets shown in Table 4 of the Region of Peel Official Plan and meets the housing policies of this Plan and local municipal official plans. The housing assessment will consider how an appropriate range and mix of housing unit types, densities, sizes, affordability, and tenure will be provided through the development. Local municipalities are required to ensure that the housing assessment is consistent with Regional policies and definitions, including using the most current rental and ownership affordability thresholds.	The Town should consider policies that enable housing developments where affordable housing is not sought/desirable to be excluded from the housing assessment requirement.



Thank you for the opportunity to provide comments. Please contact the undersigned should you have any questions. We look forward to being involved in the subsequent stages of the Official Plan review.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

---

**Karen Bennett, MCIP, RPP**  
**Partner**

cc. *Gold Humber Station Inc.*  
*K. Sliwa, Dentons Canada LLP*





October 2<sup>nd</sup> 2023

Bailey Loverock  
Team Lead, Official Plan Review / Senior Planner  
6311 Old Church Road  
Town of Caledon, Ontario  
7C 1J6

**SENT VIA EMAIL**

**SUBJECT: Future Caledon: Our Official Plan  
June 2023 Draft Future Caledon Official Plan  
SmartCentres Comments On Road Widening  
6034 Mayfield Road (PT LT 1 CON 1 ALBION AS IN R0829323)**

---

Dear Ms. Loverock,

**INTRODUCTION**

SmartCentres owns 23.31-acres of land in The Town of Caledon, bounded by Mayfield Road to the south, Airport Road to the west, adjacent industrial uses to the north, and industrial/agricultural lands to the east. The Site is currently vacant and unimproved.

The majority of the Site is designated "Highway Commercial" with a strip of lands at the northeast corner designated "General Industrial" under the Official Plan. Additionally, the Site is subject to OPA 239. Under the Zoning By-law the majority of the Site is zoned "CH-556-H19" (Highway Commercial), with the northwestern end zoned "CH-480-H13" (Highway Commercial) and the northeastern end zoned "MS-483-H13" (Service Industrial). As the Town is aware, we submitted an application on July 30, 2021, deemed complete on January 21, 2022, to modify and amend the existing designations in order to expand the range of uses permitted on site and introduce appropriate development standards in keeping with the proposed development (City File No. PRE 2020-0162, POPA 2021-0008, RZ 2021-0014).

**COMMENTS ON DRAFT OFFICIAL PLAN**

We are in receipt of the Draft Official Plan text and schedules, where Airport Road's Right-of-way (ROW) width is proposed to increase from 36 metres to 45 metres, without explanation (**FIGURE 1**). We request this requirement **be deleted in its entirety**. Widening a road can have significant negative impacts on the viability of a development site, and this new width was proposed without any rationale.

In some cases, road widening may be necessary to address specific transportation needs, but it should be done carefully, considering its long-term impacts and potential alternatives that promote sustainability, reduce pollution, and protect the environment. Comprehensive planning, environmental impact assessments, and community input are essential to making informed decisions

about road expansion projects.

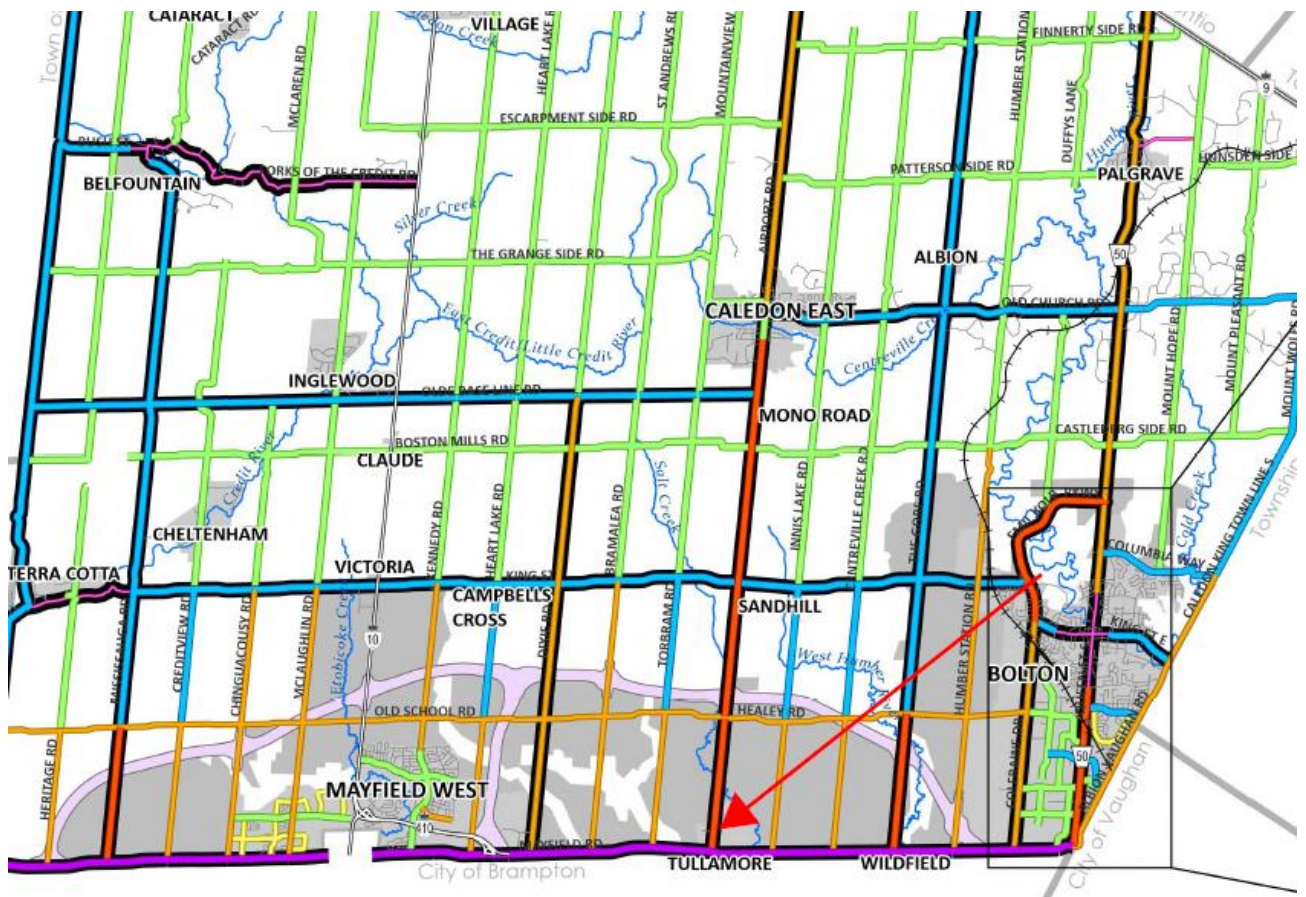
We look forward to working with the City in the review and response to this comments letter. Should you have any questions or require clarifications on any of our comments, please feel free to contact me at 416-797-5269 or at [MKruger@smartcentres.com](mailto:MKruger@smartcentres.com).

Respectfully Submitted,

**SmartCentres**



Matthew Kruger  
Director, Development



**Figure 1 – Schedule C2 of Draft Official Plan**



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

October 2, 2023

GWD P.N. 22.3194.00  
Caledon OP Review

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

Attention: Bailey Loverock, Senior Policy Planner  
Lesley Gill Woods, Senior Policy Planner

Subject: Town of Caledon Official Plan Review  
Public Input – 1000250818 Ontario Inc  
'0' Hurontario Street, Part Lot 24, Concession 1 W.H.S  
Town of Caledon

Dear Bailey and Lesley:

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to 1000250818 Ontario Inc., the Registered Owner of the property municipally known as '0' Hurontario Street, in the Town of Caledon (hereinafter referred to as the "subject site"). We have been asked to review and provide comments, observations, and recommendations on the 'Draft' August 2023 Future Caledon Official Plan.

The subject site is located on the west side of Hurontario Street, approximately 1.275 km south of the limits of the rural settlement area of Victoria and east of the Brampton Flight Centre and Flying Club. It is vacant and featureless having an area of 0.40 ha (1.0 ac) and a frontage of 26.57 m (120 ft) (see **Appendix 1**).

Our office has been monitoring the Town's Official Plan Review process closely. By way of background an Inquiry Meeting Request (PRE 2023-0113) was filed with the Town Planning Department on May 4, 2023 in connection with the owner's desire to develop the subject site with a 6-storey, 110 room hotel.

**Overview of Current Planning Policy and Zoning**

Region of Peel Official Plan (2022) identifies the subject site as 'Urban System' and '2051 New Urban Area' on Schedule E-1: Regional Structure. The site is also identified as 'Employment Area' on Schedule E-4: Employment Areas.

Town of Caledon Official Plan (2018) designates the subject site 'Prime Agricultural Area' on Schedule A: Town of Caledon Land Use Plan.

---

**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W 0B4 • P: 905-796-5790  
www.gwdplanners.com • Toll Free: 1-855-771-7266

**CONFIDENTIALITY  
CAUTION**

This document is Consultant-Client privileged and contains confidential information intended only for person(s) named above. Any distribution, copying or disclosure is strictly prohibited. If you have received this document in error, please notify us immediately by telephone and return the original to us by mail without making a copy.

B412





Comprehensive Zoning By-law 2006-50, as amended, zones the subject site 'Agricultural (A1)'.

### **Draft August 2023 Future Town of Caledon Official**

We note the following on the Draft August 2023 Future Caledon Official Plan Schedules:

Schedule B1: Town Structure identifies the subject site as 'Urban System';

Schedule B2: Growth Management identifies the subject site as 'New Urban Area 2051';

Schedule B4: Land Use Designations designates the subject site as 'New Employment Area'; and

Schedule F1: Urban System identifies the subject site as 'New Employment Area'.

From a land use perspective, our Client wishes to express general support for the direction the Town is taking which aligns with the Region of Peel Official Plan. The subject site and greater area context are ideally positioned to accommodate employment growth. Advancing employment and more specifically hotel land use permissions on the subject site is compatible with the existing Brampton Flight Centre and Flying Club to the east.

It is our understanding that site specific employment land uses will be set out in future Secondary Plans. In this regard, we respectfully request that any future employment land use/designation on the subject site permit a hotel and accessory uses (i.e. banquet hall, retail establishment, personal service shop, etc.).

### **Absence of Associated Land Use and Growth Phasing Policies**

Lands within the New Urban Area will be subject to general land use designations until they undergo secondary planning in accordance with the growth phasing policies. To-date no detailed land use planning policy has been advanced in concert with the Land Use Designations on Schedule B4. In addition, the Draft Official Plan lacks detailed growth management policies; including mapping of Secondary Plan boundaries, phasing and planned infrastructure to support functional communities and employment areas relative to draft Policy 21.4.2 which states that privately initiated Secondary Plans will not be supported.

In the absence of the abovementioned planning policy framework, it is not possible for our Client to review, assess, and provide meaningful input in the context of current site permissions, development potential or consistency/conformity to Provincial, Regional and Town policies/plans.

### **Closing Remarks**

We support in principle the inclusion of the subject site into the Town's urban area to accommodate employment growth. We reserve the right to provide further comments as necessary once the land use policies, Secondary Plan boundaries, Growth Management and Phasing Plan become available to the public.



Should you have any questions or require any further information, please contact the undersigned.

Yours truly,

A blue ink signature of Michelle Harris, consisting of several loops and a horizontal line at the end.

Michelle Harris, M.Sc.  
Planning Associate

A blue ink signature of Marc DeNardis, featuring a stylized 'M' and 'D' followed by a horizontal line.

Marc DeNardis, B.U.R.Pl., M.C.I.P., R.P.P.  
Planning Associate

A black ink signature of Michael Gagnon, with large, sweeping loops and a horizontal line at the end.

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

cc: Mayor and Members of Caledon Council  
1000250818 Ontario Inc.





# APPENDIX 1



**AERIAL IMAGE - CONTEXT PLAN**  
**'0' HURONTARIO STREET**  
**TOWN of CALEDON**  
**REGION of PEEL**

**LEGEND**

- SUBJECT SITE**
- BOUNDARY of VICTORIA VILLAGE**

P.N.: 22.3194

Date: November 17, 2022

Scale: N.T.S

Revised:

Drawn By: D.S.

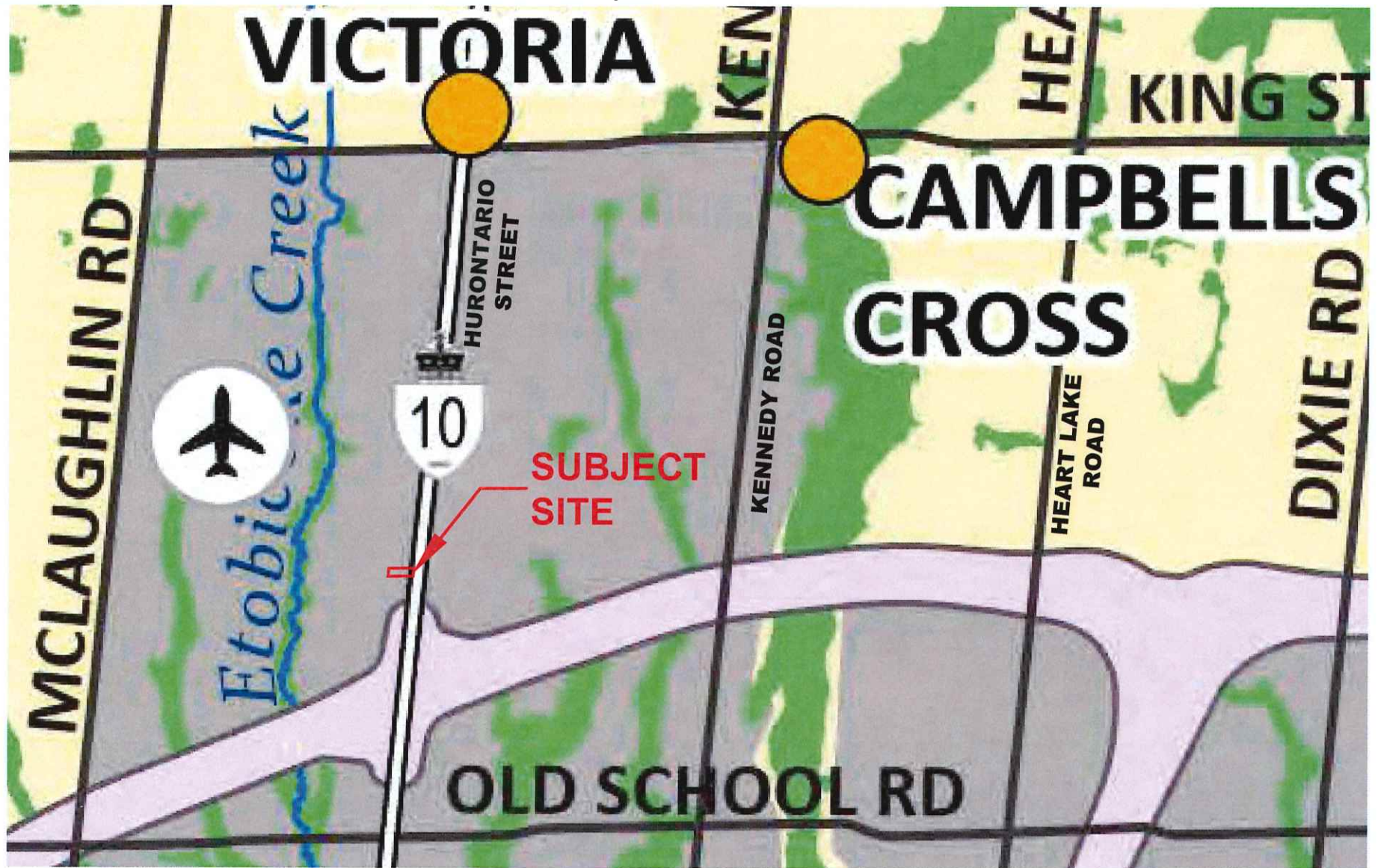
File No.: PN 3194\_Aerial\_Images\_Nov\_2022





# **APPENDIX 2**





EXTRACT from  
DRAFT SCHEDULE B1  
TOWN STRUCTURE  
DRAFT FUTURE CALEDON OFFICIAL PLAN  
AUGUST 2023

#### LEGEND

- SUBJECT SITE
- URBAN AREA
- AGRICULTURAL AREA and RURAL LANDS
- NATURAL FEATURES and AREAS
- HIGHWAY 413 TRANSPORTATION CORRIDOR
- HAMLET

BRAMPTON/CALEDON AIRPORT

P.N.: 22.3194

Date: September 22, 2023

Scale: N.T.S.

Revised:

Drawn By: D.S.

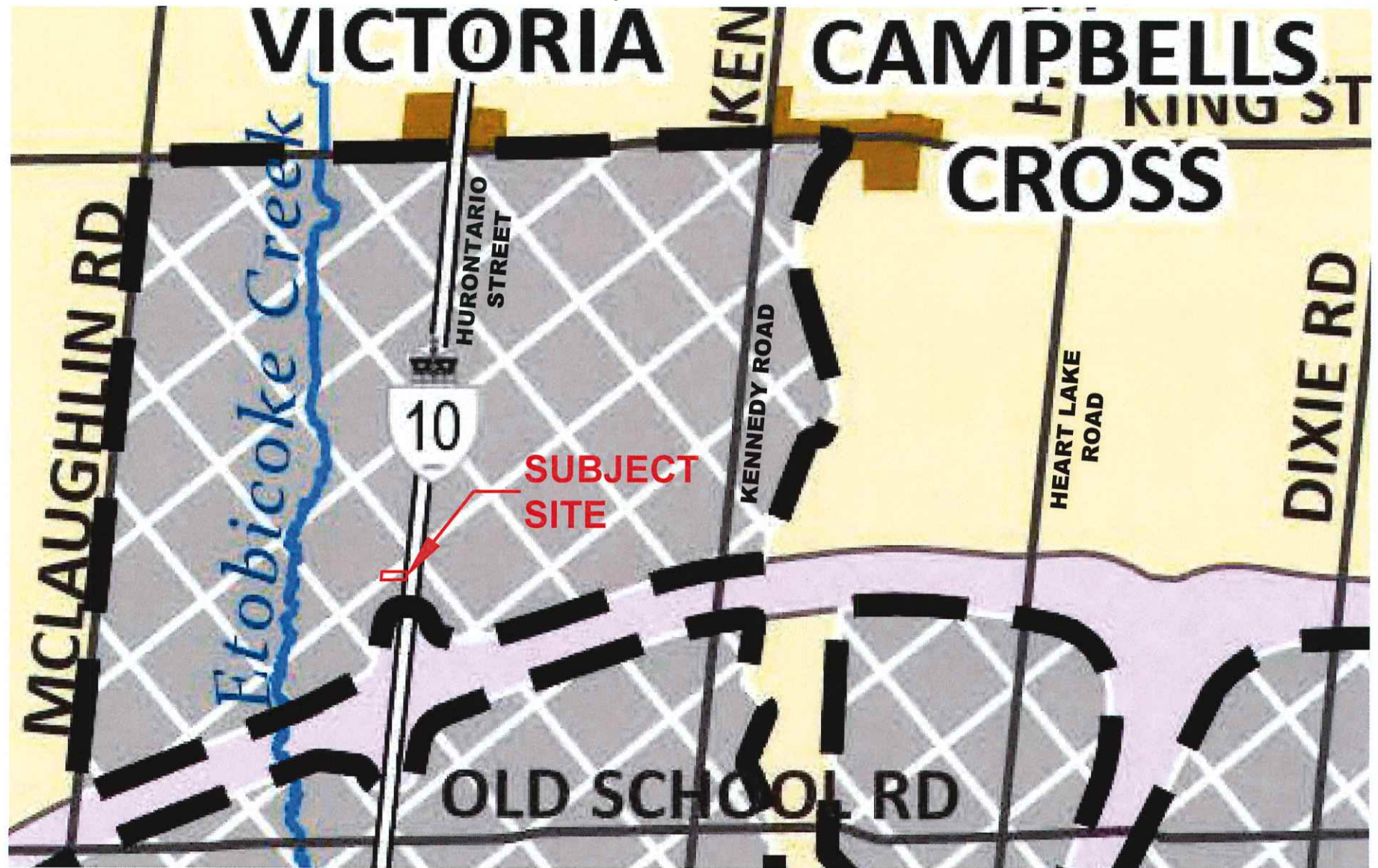
File No.: PN 3194\_OP\_Figures



**GWD**  
Gagnon Walker Domes  
PROFESSIONAL PLANNERS

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EXTRACT from  
DRAFT SCHEDULE B2  
GROWTH MANAGEMENT  
DRAFT FUTURE CALEDON OFFICIAL PLAN  
AUGUST 2023

## LEGEND

- SUBJECT SITE
- REGIONAL URBAN BOUNDARY
- NEW URBAN AREA 2051
- AGRICULTURAL AREA and RURAL LANDS
- RURAL SETTLEMENT AREA
- HIGHWAY 413 TRANSPORTATION CORRIDOR

P.N.: 22.3194

Date: September 22, 2023

Scale: N.T.S

Revised:

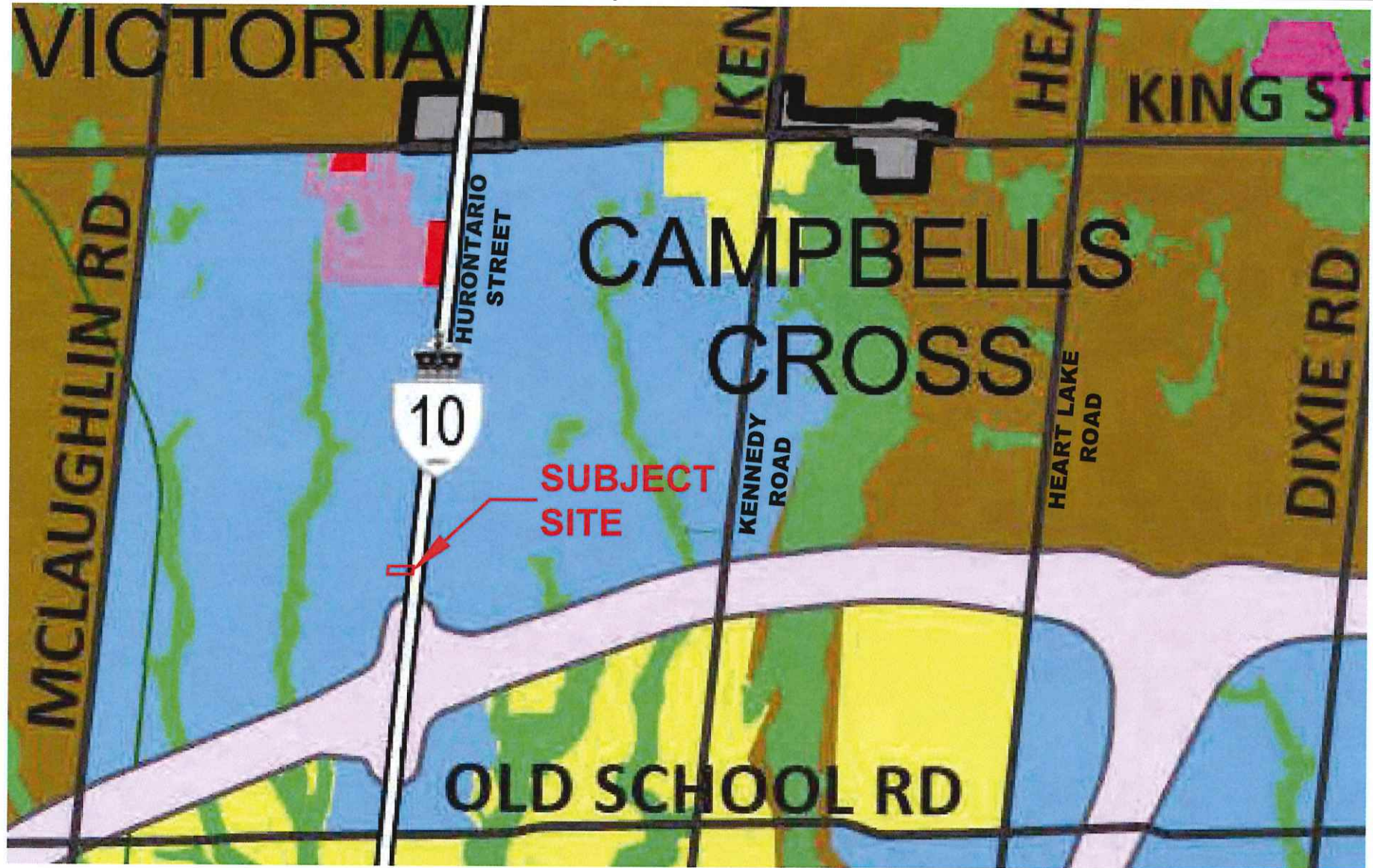
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File No.: PN 3194\_OP\_Figures











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EXTRACT from  
DRAFT SCHEDULE B4  
LAND USE DESIGNATIONS  
DRAFT FUTURE CALEDON OFFICIAL PLAN  
AUGUST 2023

## LEGEND

	SUBJECT SITE		EXTRACTIVE INDUSTRIAL
	NEW EMPLOYMENT AREA		HIGHWAY 413 TRANSPORTATION CORRIDOR
	NEW COMMUNITY AREA		
	PRIME AGRICULTURAL AREA		
	HIGHWAY COMMERCIAL		
	DRY INDUSTRIAL		

P.N.: 22.3194

Date: September 22, 2023

Scale: N.T.S.

Revised:

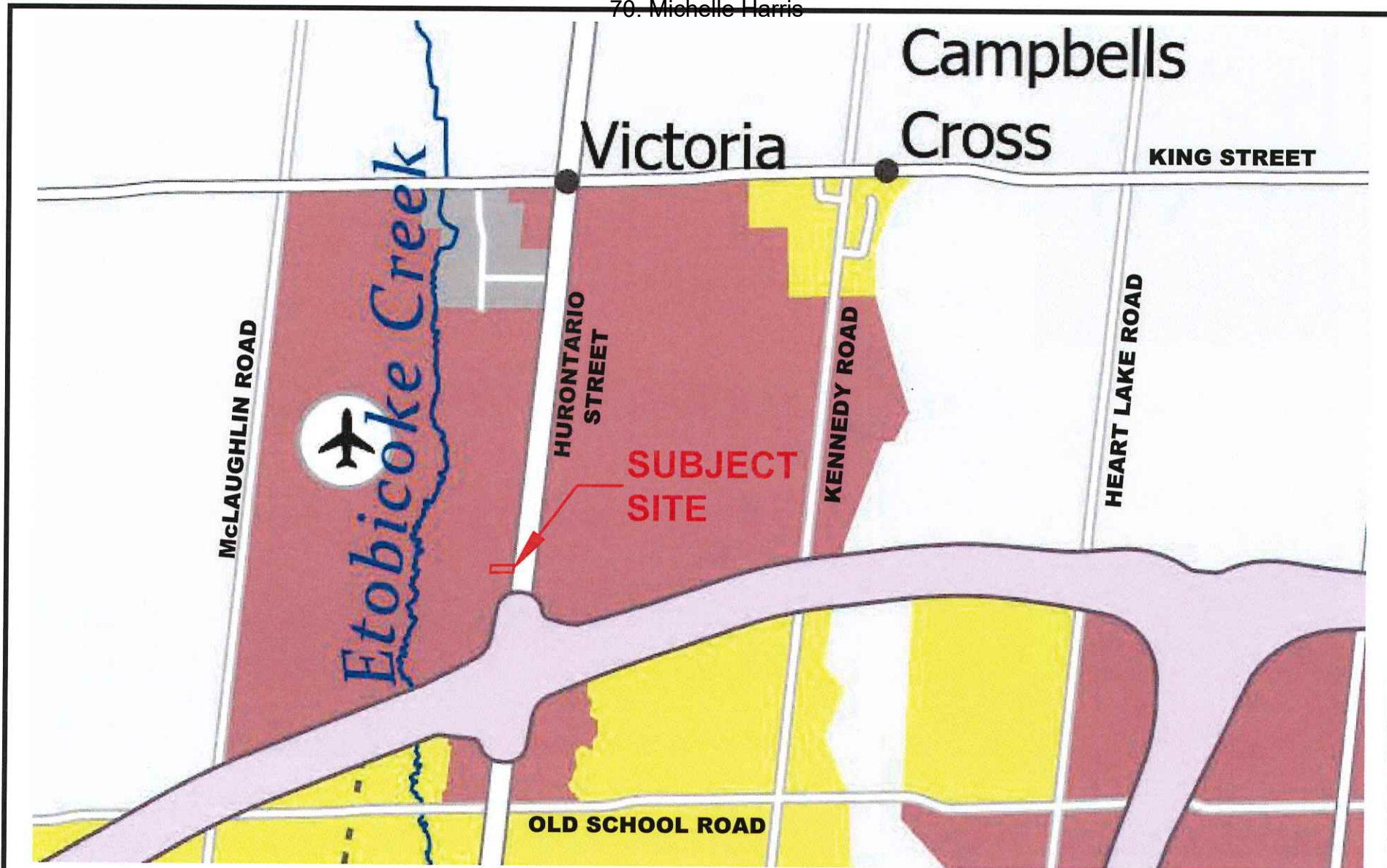
Drawn By: D.S.

File No.: PN 3194\_OP\_Figures









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EXTRACT from  
DRAFT SCHEDULE F1  
URBAN SYSTEM  
DRAFT FUTURE CALEDON OFFICIAL PLAN  
AUGUST 2023

## LEGEND

-  SUBJECT SITE
-  NEW EMPLOYMENT AREA
-  NEW COMMUNITY AREA
-  EXISTING URBAN AREA
-  RURAL SYSTEM
-  HIGHWAY 413 TRANSPORTATION CORRIDOR



BRAMPTON/CALEDON  
AIRPORT

P.N.: 22.3194

Date: September 22, 2023

Scale: N.T.S

Revised:

Drawn By: D.S.

File No.: PN 3194\_OP\_Figures



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Town of Caledon  
 6311 Old Church Road  
 L7C 1J6

October 2, 2023  
 File 10846

**Attn: Bailey Loverock, Senior Policy Planner**  
**Team Lead, Official Plan Review**

**Re: Future Caledon: Our Official Plan – August 2023 Draft Future Caledon Official Plan**  
**South Simpson Landowner's Group**  
**Town of Caledon**

Weston Consulting is the planning representative on behalf of the Simpson Road Landowners Group Inc. which is comprised of five (5) parcels located within the South Simpson Industrial Secondary Plan Area, at the north-east quadrant of the Mayfield Road and Coleraine Drive intersection (the 'subject lands') (Figure 1). Weston Consulting has been engaged to assist the owners in participating in the Block Planning and Master Environmental and Servicing Plan (MESP), which is under preparation for a future submission.

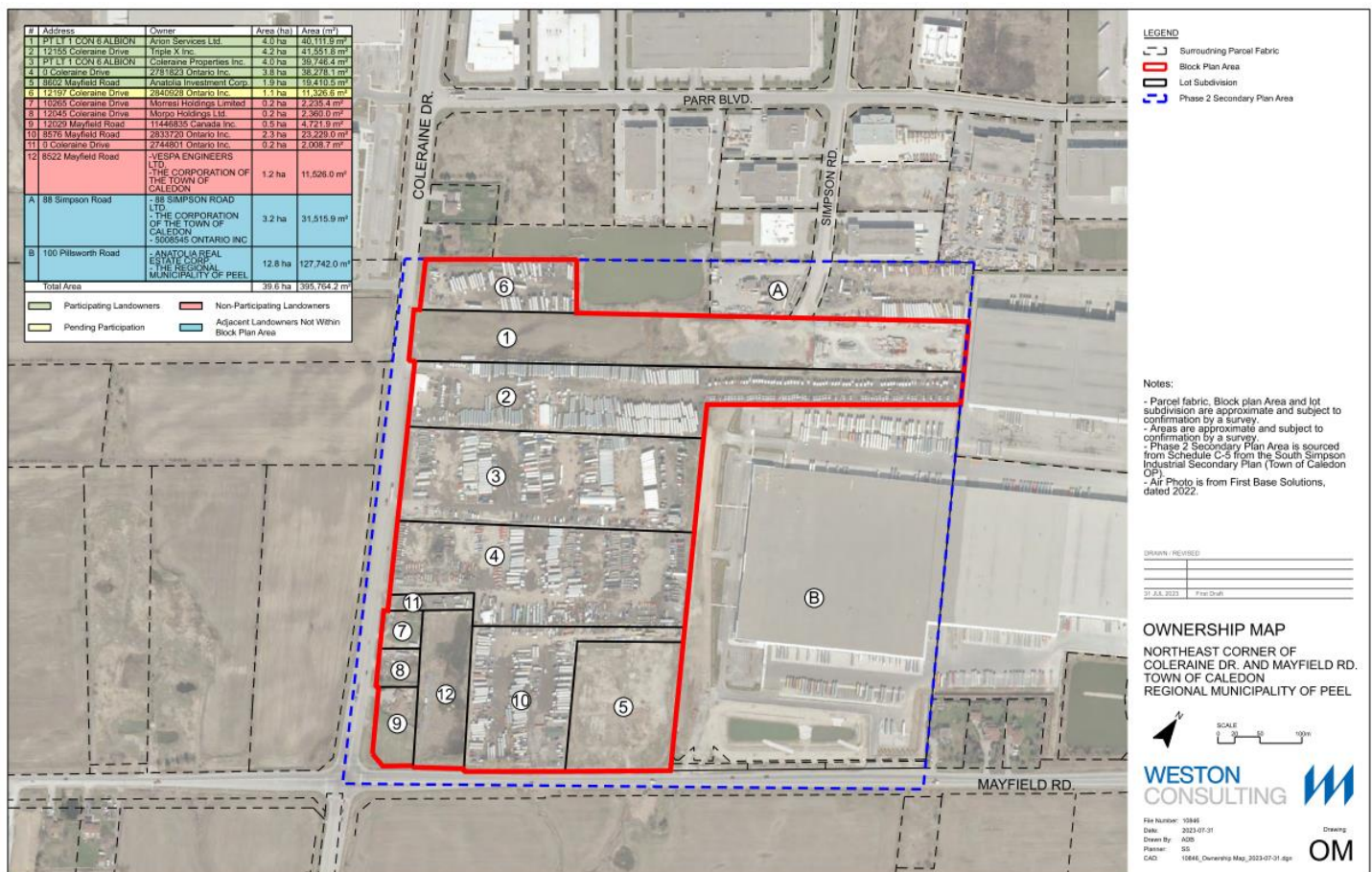


Figure 1: Ownership Map



## Description of the Subject Lands

The South Simpson Industrial Secondary Plan Area is approximately 39.6 hectares (98 acres) in area and is located east of Coleraine Drive and north of Mayfield Road, with the community of Bolton. The South Simpson Industrial Secondary Plan Area is located within the *Urban Area* and designated as *Provincially Significant Employment Zone*.

## Purpose

On August 30, 2023, the draft new Future Caledon Official Plan (FCOP) was released for public review and comment and this document is meant to replace the existing Official Plan. We understand that this release is within Phase 1, as part of a three phased approach.

The current draft provides Phase 1 framework and policies to guide development and decision making to 2051. Phase 2 and 3 of the Official Plan Review will add new policies regarding growth management and updated policies for the Town's existing secondary plan areas.

This letter is being submitted in response to the FCOP as it pertains to the subject lands. We have provided a delegation at the Public Meeting on September 19, 2023 and this letter further emphasizes remarks made verbally at the meeting.

## Background

The subject lands are currently designated *Prestige Employment* within the South Simpson Industrial Secondary Plan Area C-5 within the existing Official Plan and located within Phase 2 of the Secondary Plan Area (Figure 2). C-5 also depicts the conceptual future road extension of Simpson Road to Mayfield Road.



Figure 2: Town of Caledon Official Plan Schedule C5

## Draft Future Caledon Official Plan

Weston has reviewed the FCOP as it relates to the subject lands and note that Schedules C1 and C2 have been provided in a draft form. We agree with the policies regarding employment areas and understand that the FCOP will be updated through further Town-initiated official plan amendments to incorporate secondary plans based on comprehensive secondary planning for the Town's new community and employment areas as part of Phase 3. We reserve the right to participate in and provide comments once Phase 3 commences and policies and mapping is released.

We note that Schedule C1 depicts the conceptual future road extension of Simpson Road to Mayfield Road and we agree with this general depiction, as the Block Plan submission intends to facilitate this future connection. We note that the depiction of Simpson Road appears to be aligned without any curvature, which conflicts with current alignments proposed. We hereby ask that the schedules be modified to reflect the planned and depicted layout and add policies ensure ultimate flexibility in final alignment without the need for an amendment.

In addition, we note that Schedule C1 also depicts a future conceptual east/west collector road within the subject lands and the owners have concerns regarding its inclusion (Figure 3).

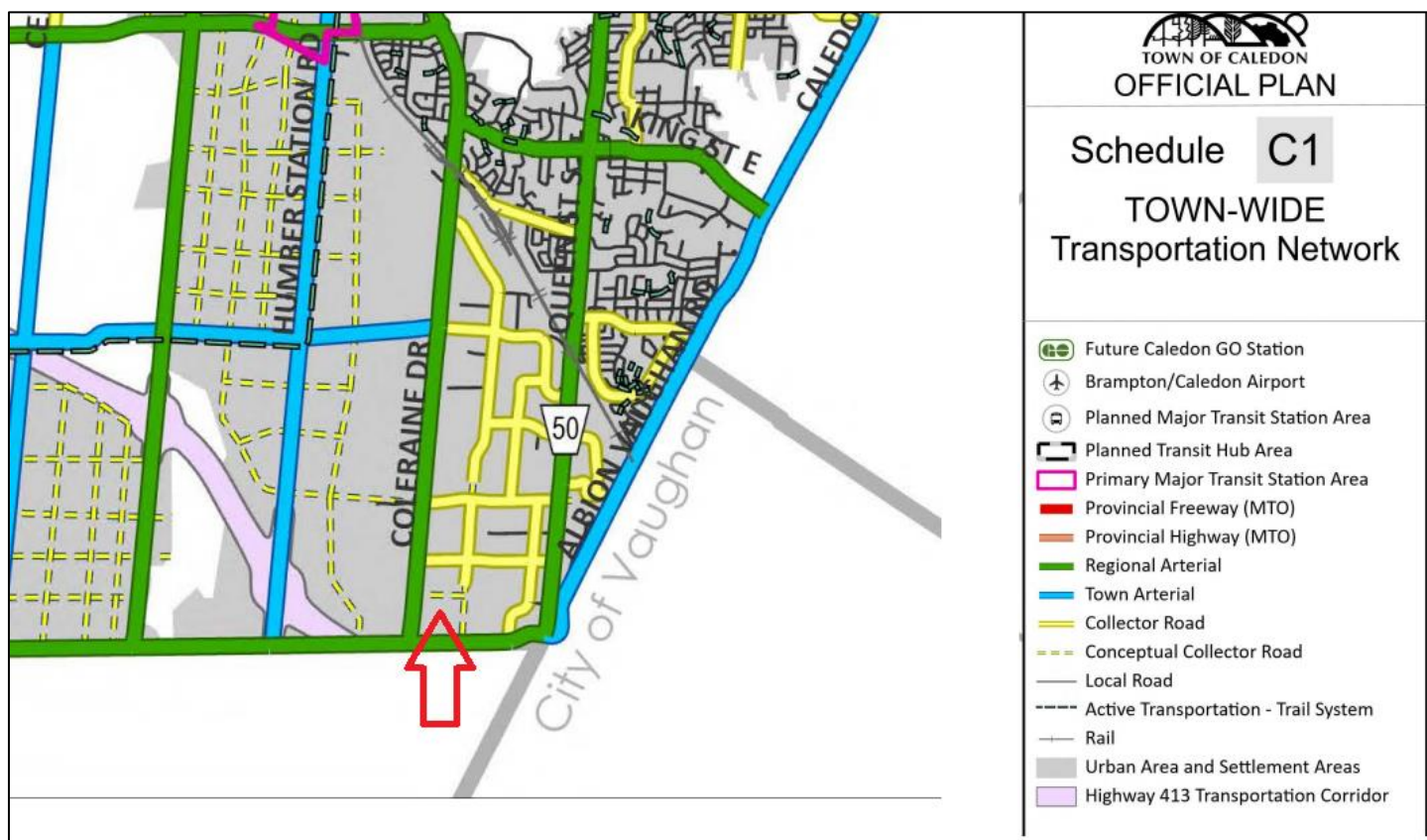


Figure 3: FCOP Draft Schedule C1

The intent of the Secondary Plan Area is to provide for the future connection of Simpson Road out to Mayfield Road. As Coleraine Drive is noted as a Regional Arterial road, the intent is to have each individual landholding within the Secondary Plan Area have frontage on the extension of Simpson Road and limit traffic to Coleraine Drive.



The addition of this east/west collector road will result in a loss and fragmentation of employment land use and would provide added traffic to Coleraine Drive, which we understand is not preferred and is undesirable.

The Simpson Road Landowners Group Inc. has retained LEA Consulting Ltd. (LEA) to undertake a traffic impact study as part of the Block Plan submission. In addition to this, LEA has reviewed the draft FCOP schedules and from a transportation engineering standpoint, we ask that their comments, which are attached hereto be considered and incorporated and that the further analysis undertaken by LEA be considered in further amendments to the policies. This further analysis will be provided under separate cover.

### Summary

We appreciate the opportunity to provide comments in relation to the draft FCOP and reserve the right to provide further comments and review regarding any proposed forthcoming amendments to the draft policies and mapping and the Phase 3 Secondary Plan review.

If you have any questions or comments, please do not hesitate to contact Ryan Guetter (ext. 241) or Paul Tobia (ext. 290).

Yours truly,

**Weston Consulting**

**Per:**



Ryan Guetter, BES, MCIP, RPP  
Executive Vice President



Paul Tobia, BURPI, MCIP, RPP  
Senior Planner

- c. Simpson Road Landowners Group Inc.  
Helen Mihailidi, Trustee, Simpson Road Landowners Group Inc.  
Andrew Pearce, Director of Engineering Services, Town of Caledon

Attachment: Transportation Letter – Feasibility of Proposed E-W Road, LEA Consulting Ltd.



October 2, 2023

Reference Number: 24085

Simpson Road Landowners Group Inc.  
c/o Helen Mihailidi  
7501 Keele Street, Suite 200  
Vaughan, ON  
L4K 1Y2

Dear Helen Mihailidi,

RE: Transportation Letter  
Feasibility of Proposed E-W Road  
Coleraine Drive and Mayfield Road, Town of Caledon

LEA Consulting Ltd. (LEA) was retained by the Simpson Road Landowners Group Inc. to undertake a Transportation Impact Study (TIS) for the proposed development of an industrial block of approximately 36.75 hectares of land located at the northeast corner of Coleraine Drive and Mayfield Road in the Town of Caledon, herein referred to as the "subject lands".

It is understood that the Town of Caledon is undergoing an Official Plan review process and has identified a new east-west collector road, south of George Bolton Parkway, to connect Coleraine Drive to Simpson Road, along with a proposed signalized intersection, as seen in Attachment 1. As the proposed east-west collector road will travel through a portion of the subject lands, it will result in impacts to density, site configuration and design, among other things.

Accordingly, LEA is in the process of undertaking intersection capacity analysis of the surrounding road network to determine if the new east-west collector road is required from a transportation perspective. Although the findings are not yet available, the traffic analysis is underway, and LEA will provide an opinion upon completion.

Should you have any comments or questions, please do not hesitate to contact the undersigned.

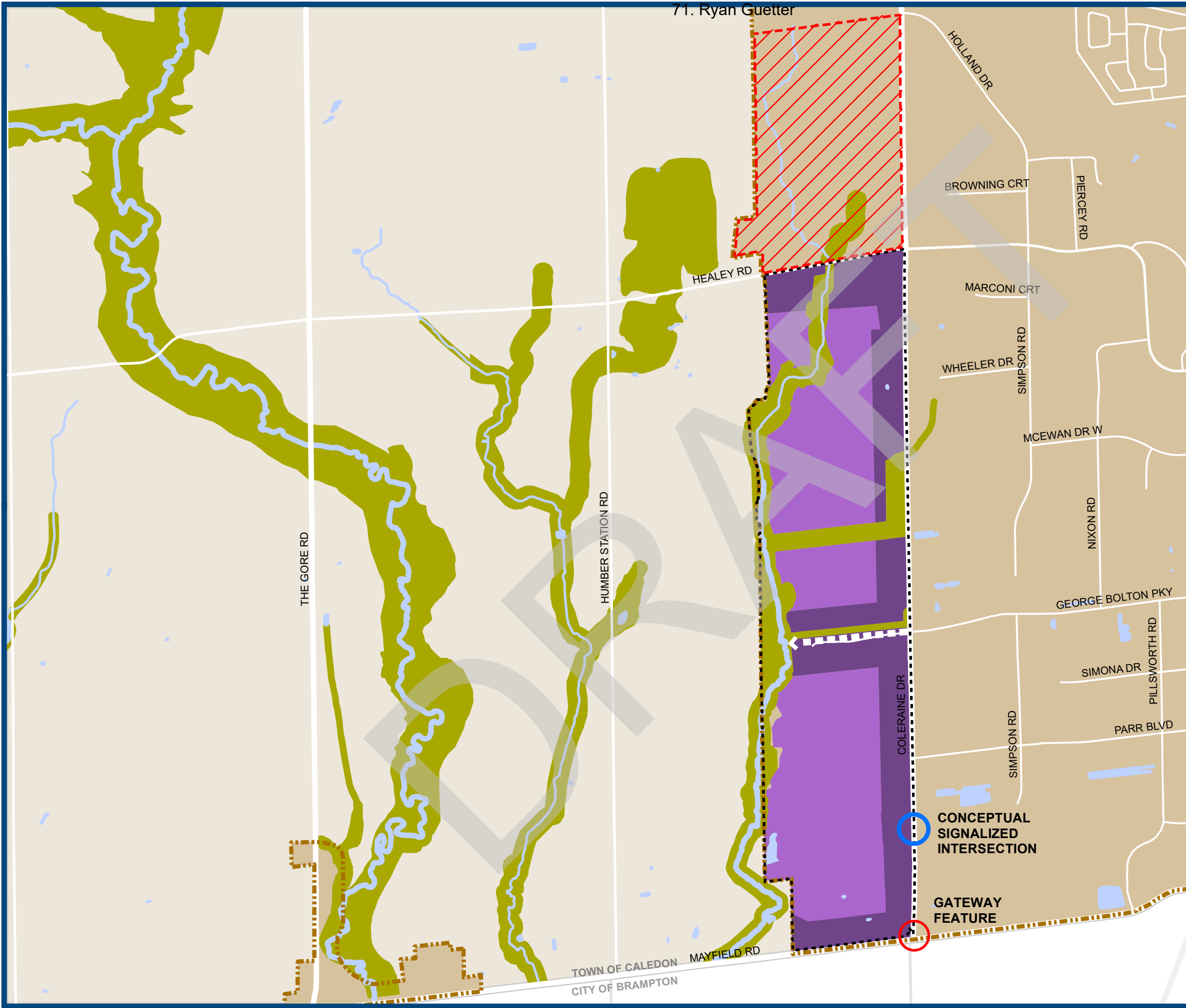
Yours truly,  
LEA CONSULTING LTD.


Zara Georgis, M. Eng., P. Eng.  
Project Manager, Transportation Planning & Engineering

Encl. Attachment 1: Schedule C7

# ATTACHMENT 1

Schedule C7















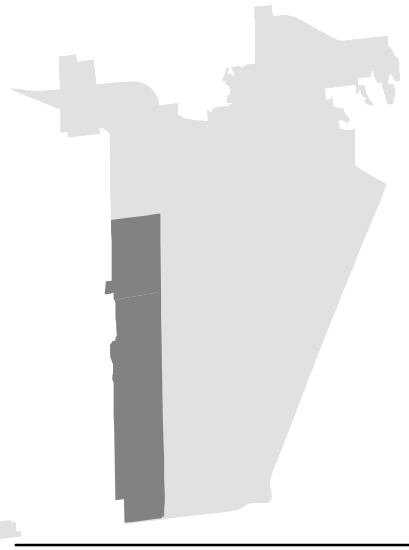


# Schedule C-7


(A Subschedule to Schedule "C")

## COLERAINE WEST EMPLOYMENT AREA LAND USE PLAN


-  Prestige Industrial
-  General Industrial
-  Environmental Policy Area
-  Secondary Plan Area
-  O.Reg 210/13 (Minister's Zoning Order)  
Part of ROPA 28 (Approved by the OMB February 26th, 2016)
-  Bolton Settlement
-  Conceptual Road Network
-  Regional Road
-  Local Road
-  Railway
-  Gateway Feature
-  Conceptual Signaled Intersection



Base Data Source: Town of Caledon



0 50 100 200 300 400 500 m



September 29, 2023

delivered electronically ONLY

## Town of Caledon

Town Hall  
6311 Old Church Road  
Caledon, On  
L7C 1J6

Attn:

**Mr. Carmine Caruso** [Carmine.caruso@caledon.ca](mailto:Carmine.caruso@caledon.ca)  
Interim Chief Planner/ Director of Planning

**Ms. Bailey Loverock, RPP** [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)  
Team Lead, Official Plan Review/Senior Policy Planner  
Strategic Policy Planning  
Planning Department

Property Address of Concern:	<b>13740 Centreville Creek Road</b>
Property Ownership:	CVCR HOLDINGS INC.
Property Identification Number (PIN)	14327-0126 LT
Est. Total Lot Area:	100 Acres

Respected Officials:

We submit this letter to the Town of Caledon in regard to the Town's Request for Submission of properties of interest to be included with the Town's Growth Management and Phasing Plan. This letter is a follow up to our last communication with Town Planning officials on June, 2022.

Our firm represent all Planning, Urban Design, and development application's related to the above noted address. In addition, RGC has been contacted by other landowners within the area of our clients' lands for information and inclusion and professional representation on their behalf.

We respectfully recognize that the subject lands fall within the pending Secondary Plan Study area for Growth Management under the new Caledon Official Plan. We refer the Town to the RGC context map identifying the subject site. It is our client's intent to ensure that the subject lands be included within expected plan and study area, and by way of our office, we aim to work with Town officials in a timely manner. Deliberate Planning strategies must be implemented for these properties to ensure the efficient delivery infrastructure and protection of the financial and economic well-being as outlined in "Settlement Area Boundary Expansion."

In light of growing pressures from North Brampton and the many applications for conversion of lands from Employment to Non- Employment, it is our opinion that this development will comply with the Provincial Policy Statement.

RGC is prepared to work and consult with civic officials in order to ensure inclusion of this site within the settlement area expansion is manageable, buildable and achievable for the future success of this new community.

In conclusion, we hope that the Town will continue to communicate with all vested stakeholders directly.

We respectfully await *the Town's "NEXT STEPS"* approach and plan for implementation.



In the meantime, and mindful of time, kindly contact us at your convenience to continue this important discussion and acknowledge receipt of this letter.

Respectfully submitted,

**RG CONSULTING INC.**



**Ralph P. Grittani** B. Arch. BUS, OPPI, CIPc, Cahp  
Principal

cc. J. Bhatti- Falco Group  
cc. CVCR HOLDING INC.





September 30, 2023  
Steven Burke  
Manager, Strategic Policy Planning  
Town of Caledon  
6311 Old Church Road  
Caledon, ON  
L7C 1J6  
Via email: [Steven.Burke@caledon.ca](mailto:Steven.Burke@caledon.ca)

**RE: Comments on Draft Caledon Official Plan  
13070 HEART LAKE ROAD, CALEDON**

Cedar City Developments Ltd., under the corporate name of Cedar Rox Heart Lake Inc., owns 96 acres within the Settlement Area Boundary Expansion (“SABE”) identified as Community Area, in the Region of Peel Official Plan. The lands are also designated *New Urban Area* on Growth Management Schedule B-2 and *New Community Area* on Schedule B-4 of the Town of Caledon’s Draft Official Plan. The Subject Property is municipally known as 13070 Heart Lake Road (the “Subject Lands”), in the Town of Caledon, and located at the northwest corner of Heart Lake Road and Old School Road, southwest of the protection corridor for the future 413 Highway and a proposed interchange near Heart Lake Road.

The Town’s August 2023 Draft Future Caledon Official Plan presented to the community in September 2023 embodies a number of new policies recently introduced through OPA 270 related to Minister’s Zoning Orders and Community Infrastructure and Housing Accelerator requests. It also addresses the need for Secondary Plans for any undeveloped or partially developed area within the 2051 New Urban Area, and the need for Growth Management and Phasing policies to be introduced through an updated Official Plan. The Draft Official Plan now proposes a framework and policies to guide development for several years to come.

This letter provides our comments on the proposed Draft Official Plan and its potential implications for the development of the Subject Lands.

**Comments**

***Secondary Plan Areas - 13070 Heart Lake Site Should be Treated as Part of Mayfield West Secondary Plan Area***

The proposed Official Plan Amendment indicates that Secondary Plans will be added through future phases of the Official Plan Review. The delineation of those Secondary



Plan Areas is an important planning question, upon which we offer the following comments.

The Subject Lands are just north of the Mayfield West Secondary Plan Area, in which *Phase 1* is already developed, and *Phase 2 - Stage 1* is mostly developed and occupied. In addition, *Phase 2 - Stage 2* is draft approved, with engineering designs under review.

In proceeding with Secondary Planning, the Town should extend the Mayfield West Study Area to include the new Community Area lands north of Old School Road and south and west of the GTA West Preferred Route as a logical extension of that Secondary Plan Area. The GTA West Preferred Route forms a strong physically definable boundary, and would allow development to proceed in the Secondary Plan Area in a way that allows for a complete community, and that maximizes efficiencies of planned and existing servicing infrastructure. It will also help focus growth in relation to the high order transit facilities anticipated within the Mayfield West Phase 2 Stage 1 Transit Hub.

These lands will effectively function as part of the Mayfield West community once constructed. Their relatively modest size, and geographic location make incorporation into the existing Secondary Plan Study Area a sound planning choice. The relatively small size of these various parcels in relation to the new Community Area itself, and the overall area in question are really too small to make for efficient planning as a stand-alone Secondary Plan Area. The more efficient and coherent approach is to treat the lands as an addition to the Mayfield West Secondary Plan Area, and ensure that they can be planned in relationship to this context.

As the Town progresses through the Secondary Planning process, adding these lands with more specific land use designations and new policies, to the Mayfield West Secondary Plan Area, allows them to be further planned and refined through this process and will reflect a more comprehensive approach to the planning for the broader area. The proposed lands to be added, including the Subject Lands, will provide for a logical extension to the existing Mayfield West community.

The addition of the lands into the existing Mayfield West Secondary Plan area can also facilitate a more comprehensive approach to regional servicing and transportation and better facilitate phasing for both infrastructure and development. There is a potential however that the phase-out of Peel Region could put at risk or delay the delivery of necessary capital projects to be funded by development charges which are needed to service the Mayfield West expansion and which are currently anticipated to be built by the Region. If such becomes the case, it may give rise to a need for developers to front-end fund and build the necessary servicing infrastructure. The inclusion of more lands within an expanded Mayfield West Secondary Plan Area will reduce the financial burden per unit, and thus reduce the cost to deliver homes to the market.



***Secondary Plan Preparation - Flexibility Should Be Introduced to Allow Land Owners to Lead Secondary Planning Where Appropriate, Following Co-ordination and Guidance from Municipality***

The proposed process for the completion of Secondary Plans is set out as follows in the Draft Official Plan :

**Policy 21.4.3:**

*Secondary Plans shall be prepared, led and completed by the Town in accordance with the approved growth management and phasing study and Region of Peel Official Plan. As appropriate, the Town may consider the participation of owners and/or developers in the preparation of supporting studies, where a Terms of Reference has been completed to guide the secondary plan, and specify roles and responsibilities, at the sole discretion of the Town.*

The current proposed policy for Secondary Plans as noted above, sets out that the Secondary Plans **shall** be prepared, led and completed by the Town. While there is the opportunity for owners and/or developers to carry out supporting studies, more flexibility in these policies is needed to expedite the process and approvals to move development forward more efficiently. We would recommend the policy wording be amended to consider revised wording such as “shall generally” be prepared, led and completed by the Town or “shall be coordinated” by the Town.

Such an approach will allow the municipality to focus the time and work of planning staff, and to likely achieve additional fiscal, and time-line efficiencies. With municipalities facing increasing pressure to demonstrate and deliver results in planning and the delivery of housing, the availability of increased flexibility to do so, while minimizing costs to the taxpayer, creates a helpful range of options to have available. The suggested additional flexibility in the proposed policy will provide the municipality the ability to tailor approaches appropriately to each situation, while retaining full ultimate control of the process.

***Block Plan Preparation - Should Not Require Formal Official Plan Amendment***

The Town’s proposed policy on Block Plans is set out in the Draft Official Plan as follows:

**Policy 24.4.1:**

*Subsequent to the approval of a secondary plan in the Greenfield Area, and prior to development, the Town will require a block plan to be incorporated into this Plan through an official plan amendment to demonstrate how the applicable*





*secondary plan will be implemented and establish a context for coordinated development.*

The policies related to Block Plans provide for the completion of plans that will further detail land use and the implementation of development for the new areas. While we do not have concerns with the concept of a block plan process, the currently proposed policies require such plans to be approved through Official Plan Amendments.

In most other municipalities, Block Plans/Tertiary Plans are prepared by owners and/or developers and endorsed by Council rather than through a formal Official Plan Amendment process. We strongly recommend a revision to this policy to remove the requirement for formal Official Plan approval of the Block plans.

The proposed policy will require that the Block Plan Official Plan Amendment could only take place “subsequent to the approval of a secondary plan”. A policy that requires Block Plans to be incorporated through a subsequent Official Plan Amendment will create a “double jeopardy” risk of additional appeals to the Ontario Land Tribunal, and the resulting potential for significant additional delay. Not only will the original Secondary Plan be exposed to potential appeal, there would now be a risk that the following Block Plan Official Plan Amendment, adopted after the Secondary Plan was resolved, could then also be appealed to the Tribunal, resulting in an additional Tribunal hearing. It is unlikely that the planning issues would be materially different from those at the Secondary Plan appeal hearing. Such a circumstance would result in considerable delay, and significant cost to the municipality (which would be obliged to defend the second amendment at the Tribunal). The delivery of important housing would be delayed.

In addition, the requirement that the Block Plan Official Plan Amendment could only proceed “subsequent to the secondary plan approval” will build in an additional Official Plan Amendment process into the development of the land. This would start with mandatory pre-consultation through PARC and DART, another round of planning reports, a second set of public meetings, and another round of Council consideration. This will build in significant delay and costs, while likely mostly materially replicating the Secondary Plan approval process.

In addition, we observe that the mandatory nature of this policy (“the Town will **require** a block plan to be incorporated into this Plan through an official plan amendment”) is in contradiction with the discretion in proposed policy 24.4.2 to not require a block plan at all, provided the detail in the secondary plan is satisfactory.

We recommend that the process for Block Plans be modified to eliminate the need for this additional second round of formal Official Plan Amendment, “subsequent to the approval of a secondary plan.”



**Policy 24.4.2:**

*Block plans will be prepared by landowners, to the satisfaction of the Town, in accordance with the policies of this Plan and the Town's terms of reference. If a secondary plan includes the technical level of detail that would typically be included in a block plan, a separate block planning process may not be required, at the discretion of the Town.*

We support the policy that would allow the opportunity to avoid any further planning process required through the block plan, but we suggest that there be an outline of specific criteria in order to allow landowners the opportunity to avoid further process.

***Affordable and Attainable Housing - Policy 9.8 is Overly Prescriptive and Onerous, and Thus Unlikely to Achieve the Delivery of Housing - Affordable or Otherwise***

Cedar City has a track record of delivering new homes for families, including contributing to the delivery of affordable housing, including affordable housing in the Town of Caledon. Especially at a time of housing crisis, we recognize and support the need to add significantly to the housing supply of all types, in a full range of housing options, including affordable housing.

However, we are concerned with the proposed policies found in 9.8 of the Town's proposed Official Plan. The requirement that 30% of new units meet the policy test to be "affordable" as defined in the policy (and the Provincial Policy Statement) is a very high standard, and almost certainly is not achievable in any economically viable development. As a result, the inclusion of this policy as proposed will have exactly the opposite effect of its intention - no affordable units will be delivered, nor would any market units be delivered, as they would be contingent on the delivery of the non-viable affordable requirement. The outcome would be to actually increase the severity of the housing crisis, by choking off any new supply.

In addition, by providing only one path to the delivery of housing for families in need, many other creative options and approaches to delivering affordable or attainable housing are foreclosed, and not available. The Town's policy should open the door to a range of options and approaches to achieve affordability and innovation in affordable and attainable housing supply delivery.

We encourage the Town to consider a wider range of more flexible options to provide for the delivery of affordable housing. Such flexibility will allow for the potential to actually deliver some housing that is affordable or attainable for families. While the proposed policy 9.8 as written is ambitious, and would be very satisfying if it worked - the reality is that it will simply ensure that no new housing (affordable or otherwise) is built.



***Designated Greenfield Area Densities - Policy 4.3 Diverges from Growth Plan Policies, and Has Practical Implementation Challenges***

Policy 4.3.1 of the Town's proposed Official Plan provides for development to occur at a density of 67.5 people and jobs per hectare in the Designated Greenfield Area.

We observe that this represents a significant departure from the provisions of the Growth Plan for the Greater Golden Horseshoe, which establishes a standard minimum density of 50 people and jobs per hectare.

We also note that policy 4.3.2 provides that this minimum density is to be "measured over the entire designated greenfield area of the Region of Peel". In our view, this policy poses practical problems of how it will be applied on a particular development parcel, and how discretion will be exercised to increase or lower that density on any parcel. Most significantly, the policy puts planning decisions out of the control of the Town - as the densities in the Town will become dependent upon the densities adopted in planning decisions in other parts of Peel Region.

***Conclusion - Request to Meet with Staff to Discuss Comments***

We would be happy to discuss these comments and recommendations with staff, prior to the finalization of the updated proposed Official Plan Amendment. Thank you for your consideration of our comments at this time.

Yours truly,

A handwritten signature in black ink, appearing to read "Steven Silverberg", with a long horizontal line extending from the end of the signature.

Steven Silverberg

**CEDAR CITY DEVELOPMENTS**

124 Merton Street, Suite 502, Toronto, ON. M4S 2Z2

[\(416\) 306-9900](tel:4163069900) | [steven@cedarcitydev.com](mailto:steven@cedarcitydev.com)

[www.cedarcitydev.com](http://www.cedarcitydev.com)



74. Trevor Hall

30 Floral Parkway  
Concord, Ontario  
L4K 4R1

905.669.5571  
info@dgggroup.ca  
dgggroup.ca

The Corporation of the Town of Caledon  
6311 Old Church Road  
Caledon, ON  
L7C 1J6

RE: Caledon Official Plan Comments

To Whom May Concern,

In order to ensure the efficient and effective delivery of all forms of housing in the Town of Caledon, please see below our comments with regards to the recent Town of Caledon Draft OP dated August 2023.

**General Comments**

- Remove the words *will, required, etc* with language such as *may, encourage, etc.*
- Remove percentage targets from OP language.

**Specific Policy Changes**

**17.10.1**

*Proposed Changes – Add Storm water management facilities and parks as permitted uses.*

**9.1 b)**

*Proposed Changes – Remove 25% minimum from policy. Required numbers will be completed through detailed planning applications and studies.*

**9.7.7 b)**

*Proposed Changes – Remove 50% from policy.*

**9.8**

*Proposed Changes – Remove policy all together.*

Please let us know a mutually convenient time to discuss further in more detail.

Kind Regards,

*Trevor Hall*

Trevor Hall MCIP, RPP  
Project Manager - Planning

Planning Department  
Town of Caledon  
6311 Old Church Road  
Caledon ON L7C 1J6

October 02, 2023

via email: [Steven.Burke@caledon.ca](mailto:Steven.Burke@caledon.ca) / [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca) / [opreview@caledon.ca](mailto:opreview@caledon.ca)

**Attention: Steve Burke, Manager, Strategic Policy Planning  
Bailey Loverock, Senior Planner**

Dear S. Burke and B. Loverock:

**Re: Proposed Future Caledon Official Plan Comments  
Longridge Properties  
Pulpit Ridge and Melville Park**

Sajecki Planning Inc. is the planning consultant for Longridge Partners, who manage the Pulpit Ridge and Melville Park properties in rural Caledon. Sajecki Planning Inc. is working with Longridge Partners to develop and implement the vision for these properties. As part of this process, on behalf of Longridge Partners, we are monitoring the Future Caledon Official Plan review process and would like to submit the following comments as they relate to the proposed policies and schedules, dated August 2023.

We support the steps taken by the Town of Caledon in updating its Official Plan to conform to provincial and regional policies that promote tourism opportunities and support recreational and tourism uses in Rural Lands and agricultural areas.

### **Longridge Partners' Vision**

Pulpit Ridge is a 1,200-acre assembly of properties, located south of Escarpment Sideroad, east of Hurontario Street, north of The Grange Sideroad, and west of Mountainview Road.

Longridge Partners have a vision for 140 acres of Pulpit Ridge, immediately south of the Pulpit Club (a golf club) to provide additional recreational amenities for club members and resort guests, combined with resort accommodations in the form of cottages that may be utilized by members or guests. Further phases would incorporate additional properties, which includes 250 acres south of Pulpit Ridge connected via an existing trail system through the Willoughby Nature Reserve, and 130 acres immediately south of the Paintbrush golf course. Future phases will also include resort accommodations at California Exchange, which was historically established as a bed and breakfast and Pulpit Ponds (south of the existing golf course), which has potential to be developed as a stand-alone amenity and outdoor centre to provide recreation to the Town's growing population.

Melville Park is located approximately 10 kilometers north of the Pulpit Ridge assembly. It is bound by Hurontario Street to the east and Highpoint Sideroad to the north. The site extends west, past Willoughby Road (property boundaries are illustrated in Attachment A). Longridge Partners' long-term vision for the Melville Park site includes a thoughtfully planned expansion of the settlement area to include larger estate lots with large portions of Melville Park remaining as they are, taking advantage of the extensive existing trail system throughout and providing residents and tourists alike access to the trails and railway corridor connectivity.



**Alignment with Provincial Planning Statement (2023)**

The Future Caledon Official Plan will need to be aligned with the Provincial Planning Statement (2023). On April 6, 2023, the Province posted a draft Provincial Planning Statement (PPS) to the Environmental Registry of Ontario for input. The draft PPS was further updated on June 16, 2023, and proposes merging policy directions from the 2020 Provincial Policy Statement and Growth Plan to support provincial housing objectives while protecting the environment and agricultural lands. Currently, the Growth Plan contains policies that only permit the expansion of settlement area boundaries through a municipal comprehensive review. The need for a municipal comprehensive review has been removed in the draft PPS. The draft PPS also reduces the requirements to permit a settlement area boundary expansion or identification of new settlement areas. If the draft PPS is approved, settlement area boundary expansions can occur at any time without the need for a municipal comprehensive review.

**Settlement Area Boundary Expansions**

We request that the Future Caledon Official Plan accommodate the opportunity for Longridge Partners to seek future approvals to redesignate the lands and realize the vision for Pulpit Ridge and Melville Park, including the potential for a settlement area boundary expansion to include the Melville Park lands. Longridge Partners is dedicated to working with the Town of Caledon to ensure that any future development of the sites respects the natural heritage and key natural features of the sites and aligns with the intent of municipal policies.

**Natural Features and Area Overlay**

We understand that the proposed changes brought forth by the draft Future Caledon Official Plan include the replacement of the Environmental Protection Area designation with the Natural Features and Areas Overlay as per the approved Region of Peel Official Plan. We request that we be granted additional time to submit comments on the August 2023 draft Future Caledon Official Plan in order to conduct detailed mapping and provide a comparison of the proposed overlay to understand the policy implications to specific portions of Pulpit Ridge and Melville Park.

We respectfully request the Town consider our above comments while finalizing the draft Future Caledon Official Plan. We seek to ensure that the draft Future Caledon Official Plan can achieve the goals of the proposed Provincial Planning Statement (2023) and the Region of Peel Official Plan (2022), as well as support our shared goals of achieving sustainable tourism and economic growth in Caledon's rural areas. Please also accept this letter as our request for notice of all decisions made in respect of this matter.

Yours truly,



Ed Sajecki  
*P.Eng., MCIP, RPP, PLE*  
*Partner, Sajecki Planning*

CC: Mack Crawford, Jared Grice, Ben Roberts, Amanda St. John, Blair Scorgie, Maham Siddiqui

**Attachments:**

Attachment A: Longridge Partners' Land Holdings in the Town of Caledon

Attachment B: Vision for California Exchange (16835 KENNEDY RD)

Attachment C: Vision for Pulpit Ponds (16903 HURONTARIO ST)

**Attachment A: Longridge Partners' Land Holdings in the Town of Caledon**

**Pulpit Ridge Site Boundary**

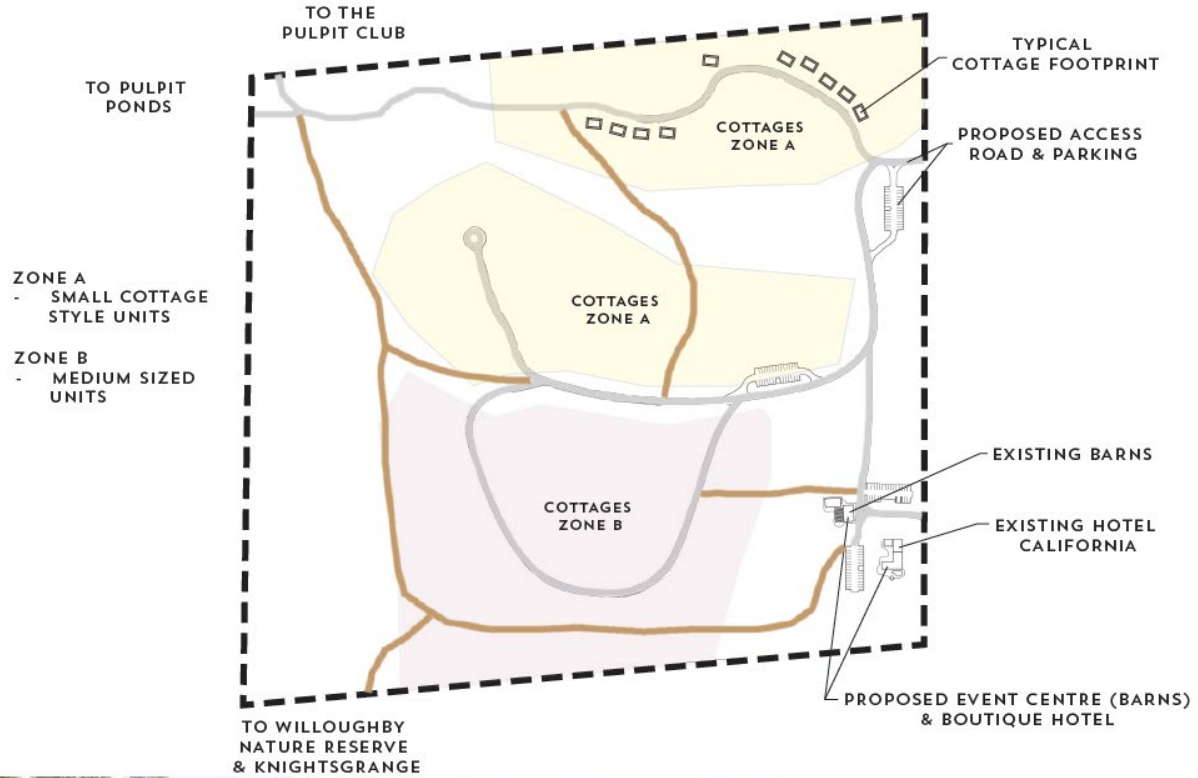


**Melville Park Site Boundary**



## Attachment B: Vision for California Exchange (16835 KENNEDY RD)

### CALIFORNIA EXCHANGE - 16835 KENNEDY RD



RENOVATION OF HOTEL CALIFORNIA TO ACT AS BOUTIQUE HOTEL.

- POOL
- ADDITIONAL ROOMS
- MEETING AREA
- PATIO & OUTDOOR AREA

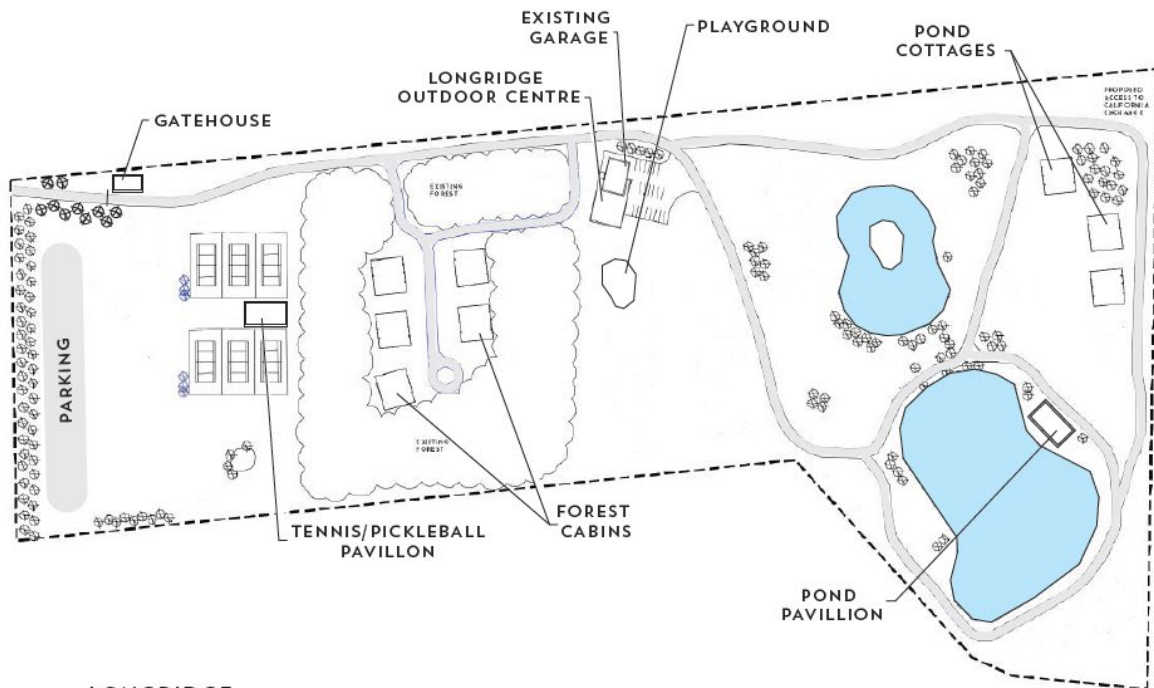


TWIN CENTURY BARNs TO BE RESTORED AND CONVERTED INTO EVENT CENTRE AND WEDDING VENUE, WITH WEDDINGS AND EVENTS HOSTED AND FACILITATED BY THE PULPIT CLUB

- PATIO/OUTDOOR AREA
- WASHROOMS
- CONNECTIVITY WITH THE CLUB

## Attachment C: Vision for Pulpit Ponds (16903 HURONTARIO ST)

PULPIT PONDS -16903 HURONTARIO ST



**LONGRIDGE  
OUTDOOR CENTRE**



- BUILT ON EXISTING GARAGE LOCATION
- RESTAURANT/CAFE
- PATIO
- WASHROOMS
- OUTDOOR ACTIVITY HEADQUARTERS
  - RECREATIONAL ACTIVITIES
  - EQUIPMENT RENTAL
  - DAY CAMPS/OUTDOOR ED

**FOREST CABINS**



- COTTAGES IN A SECLUDED, FOREST SETTING

**POND COTTAGES**



- COTTAGES WITH A VIEW OF THE PONDS

**POND PAVILLION**



**PLAYGROUND**



**TENNIS PAVILLION**







Project No. 1619

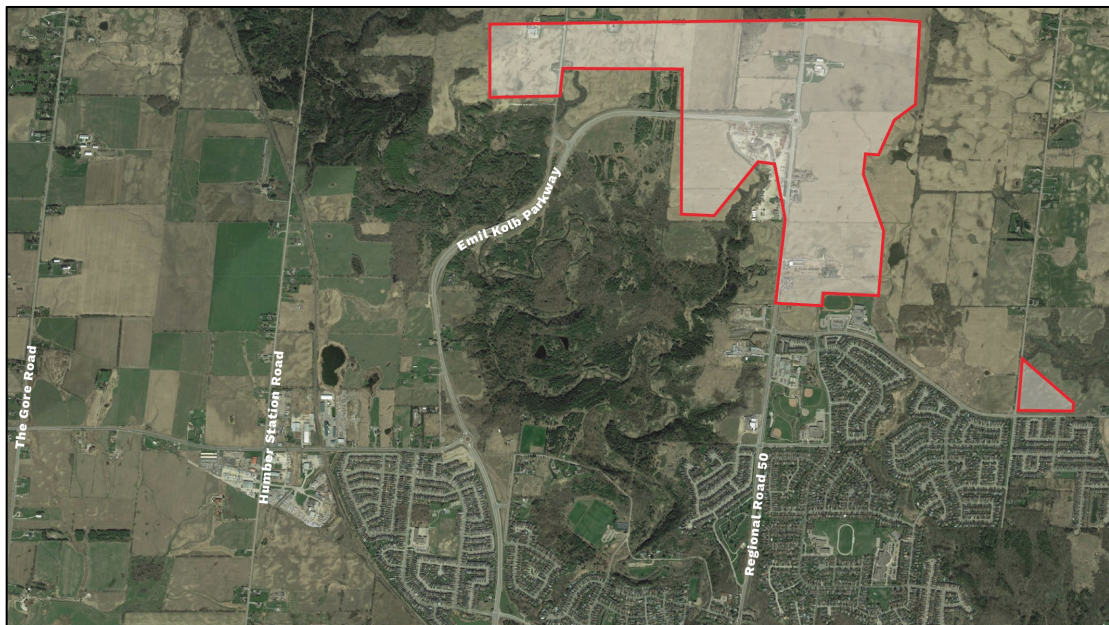
Date: October 2, 2023

Steve Burke, MCIP, RPP  
Manager, Strategic Policy Planning  
Planning Department

Dear, Mr. Burke

**Re: Draft Future Caledon Official Plan  
Response Letter on behalf of Bolton North Hill Landowners Group  
(BNHLG)**

As you may be aware, we are the planning consultants for the Bolton North Hill Landowners Group (“**BNHLG**”), a series of properties generally located around the intersection of Highway 50 and Emil Kolb Parkway at the northern extent of Bolton. See **Figure 1** below.



**Figure 1 – BNHLG Lands Aerial**

The following letter outlines a series of preliminary comments and points of clarification on the Draft Caledon Official Plan as they may have implications on the current development application before the Town; **File No. POPA 0001-2022** which contemplates the creation of a future Secondary Plan Area, Bolton North Hill.

On Tuesday September 19<sup>th</sup>, Bousfields Inc. provided a brief presentation at the Caledon Planning & Development Committee highlighting a number of items and commentary on the Future Caledon Official Plan including the following:

**Planning Policy and Schedules**

1. *Schedule B2 – Growth Management*

- The BNHLG is supportive of the Neighbourhood Centre notation on Schedule B2 which will guide future development around the intersection of Emil Kolb Parkway and Highway 50. This node is anticipated to develop as a higher density node for the future Bolton North Hill Secondary Plan Area;
- The BNHLG is supportive of the underlying Greenfield Designation for the BNHLG Lands, however, the BNHLG would like to further understand the implications of the “New Urban Area 2051” overlay and what implications (if any) there are for timelines for development of these lands;

2. *Figure D4c – Preliminary natural Heritage Feature System*

- BNHLG sought clarity on the proposed labeling for the BNHLG Lands that were referred to as “SABE Community Testing Area”;
- This was confirmed at the September 19<sup>th</sup> meeting as residual language from a third party consultant conducting the research and would be revised accordingly;

3. *Schedule C1 – Transportation Network*

- BNHLG understands the importance of future collector roads and would like to further understand the identified “Conceptual Collector Roads”;
- In particular the road that is intended to extend east from Emil Kolb Parkway through the Greenbelt through to Mount Hope Road.
- The BNHLG has received comments from the Region on their POPA 0001-2022 application that an eastern extension of the road is not being considered by the region.

**Environmental Policies**

In addition to the above items noted at the September 19<sup>th</sup> meeting, the following is a summary prepared by Dillon Consulting with regard for environmental buffers in the Draft Official Plan.

As the current Official Plan does not specify buffer widths from natural heritage features outside of the Greenbelt Plan Area (Greenbelt) or Oak Ridges Moraine

Conservation Plan Area (ORM), the standard was to defer to the Toronto and Region Conservation Authority (TRCA) Living City Policies, 2014 (LCP).

However, the Draft Official Plan does include Section 13.8 (Minimum Buffers) which dictates the minimum required natural feature buffers for all areas outside of the Greenbelt or ORM, as set out below.

<b>Component of the Natural Environment System</b>	<b>Minimum Buffer</b>
<i>Life Science Areas of Natural and Scientific Interest</i>	15 metres
Valleyland ( <i>significant</i> )	15 metres
Wetland (evaluated as non-Provincially <i>significant</i> )	15 metres
Wetland ( <i>significant</i> )	30 metres
Wildlife habitat ( <i>significant</i> )	15 metres
Woodland ( <i>significant</i> )	20 metres
Woodlands meeting one or more of the criteria for a Natural Areas and Corridors <i>woodland</i> in Table 1 of the Region of Peel Official Plan	15 metres

It is notable that these minimum buffer widths are greater than what is presented in the LCP (Policy 7.3.1.4), which are as follows:

<b>Natural System Element</b>	<b>Required Buffer Width</b>
Valley or Stream Corridor	10 metres
Woodlands	10 metres
Wetlands (Provincially <i>significant</i> )	30 metres
Wetlands (other wetlands)	10 metres

This equates to a difference of 10 m for significant woodlands (double the requirement) and an additional 5 m for other features. While it is expected that municipalities move towards more specific environmental policies, there is some confusion between this guidance and what has been presented in the Region of Peel Environmental Screening and Scoped Subwatershed Study (Wood, 2020).

Section 13.9 of the Draft Official Plan does address New Community Areas and New Employment Areas as shown of Schedule F1, and refers to the Wood 2020 study. Section 13.9.7 of the Draft Official Plan states that, *based on the above, minimum buffer widths shall be established in subwatershed studies or their equivalent when subwatershed studies are prepared to support new development in New Community Areas and New Employment Areas. The minimum buffer widths shall be established as part of an initial assessment of the general land uses contemplated adjacent to the*

*Natural Environment System and the significance of any of the components of the Natural Heritage System being studied.*

Based on this, it is assumed that the Minimum Buffer Widths presented in 13.8 do not apply in New Community Areas and New Employment Areas, as they are to be established through subwatershed studies. Furthermore, a detailed subwatershed study is currently in discussion between the Town and Region with the Applicant for POPA 0001-2022.

Furthermore, the guidance presented in Part C: Implementation Plan, of the Wood 2020 study further clarifies that “*guidance for the identification of buffers for areas outside of the Greenbelt Plan NHS should be taken from the Living City Policies (TRCA 2014), Regional and Local Municipal policies (as applicable), best practices and current literature, as appropriate. Buffers for features of the NHS will be established through detailed studies (e.g., detailed Subwatershed Study, Secondary Plan, etc.)*”.

This may suggest that within New Community Areas and New Employment Areas, the LCP buffer widths could apply (or otherwise determined through best practices), but the policies in section 13.8 of the Draft Official Plan would not apply. However, all areas outside of these areas and outside of the Greenbelt NHS, the policies in section 13.8 of the Draft OP would apply.

### **Next Steps**

The BNHLG is continuing to engage with Town and Regional Staff on a monthly basis and is in the process of scheduling a comprehensive Secondary Planning Design Charrette in November 2023. The BNHLG looks forward to continuing its collaborative efforts with both Region and Town Staff to implement the new Official Plan policies into the future Bolton North Hill Secondary Plan.

Yours truly,

**Bousfields Inc.**



**Michael Bissett MCIP, RPP**



Planning and Development Services  
Town of Caledon  
Caledon, Ontario ON L7C 1J6

October 3, 2023  
File 11478

**Attn: Bailey Loverock, Senior Policy Planner**

**RE: Comments on the Future Caledon Official Plan  
Southwest of Airport Road and Old School Road  
PT LT 22 CON 6 EHS CHINGUACOUSY AS IN RO860826; EXCEPT PT 5, 43R19787; S/T  
DEBTS IN RO897062; S/T SPOUSAL INTEREST IN RO897062 ; CALEDON**

Weston Consulting is the planning consultant and authorized agent representing the owner of the lands located southwest of the Airport Road and Old School Road intersection in the Town of Caledon, herein referred to as the subject lands. The subject lands have an approximate area of 20.43 hectares (50.50 acres) and a frontage of approximately 304.99 metres along Airport Road.

The purpose of this letter is to provide comments on the Town's Draft Future Caledon Official Plan ("Draft OP"), as it relates to the land-use designations for the property, as proposed in Draft Schedule B1: Town Structure, Draft Schedule B2: Growth Management, Draft Schedule B4: Land Use Designations, and Draft Schedule F1: Urban System.



**Figure 1: Aerial Photo**



## Town of Caledon Official Plan

The Town of Caledon Official Plan (the “OP”) provides a land use framework for the municipality and assists the Town with acknowledging lands for the purpose of residential and employment growth and development. The subject lands are currently designated as *Prime Agricultural Area* and *Environmental Policy Area* per Schedule A: Land Use Plan of the Town’s OP (Figure 2). The permitted uses for lands designated *Prime Agricultural Area* include agricultural, high impact agricultural, on-farm diversified, agri-tourism, existing single detached dwelling, agriculture-related commercial, agriculture-related industrial, accessory residential uses to a farm operation, second dwellings for heritage preservation, home occupations including establishments accessory to a non-agricultural single-detached dwelling, non-intensive recreation, stewardship and environmental protection activities, and public uses. Based on the current land use designation and the permitted uses for the subject lands, development on the subject lands is limited to uses related to agricultural and agricultural-related activities.

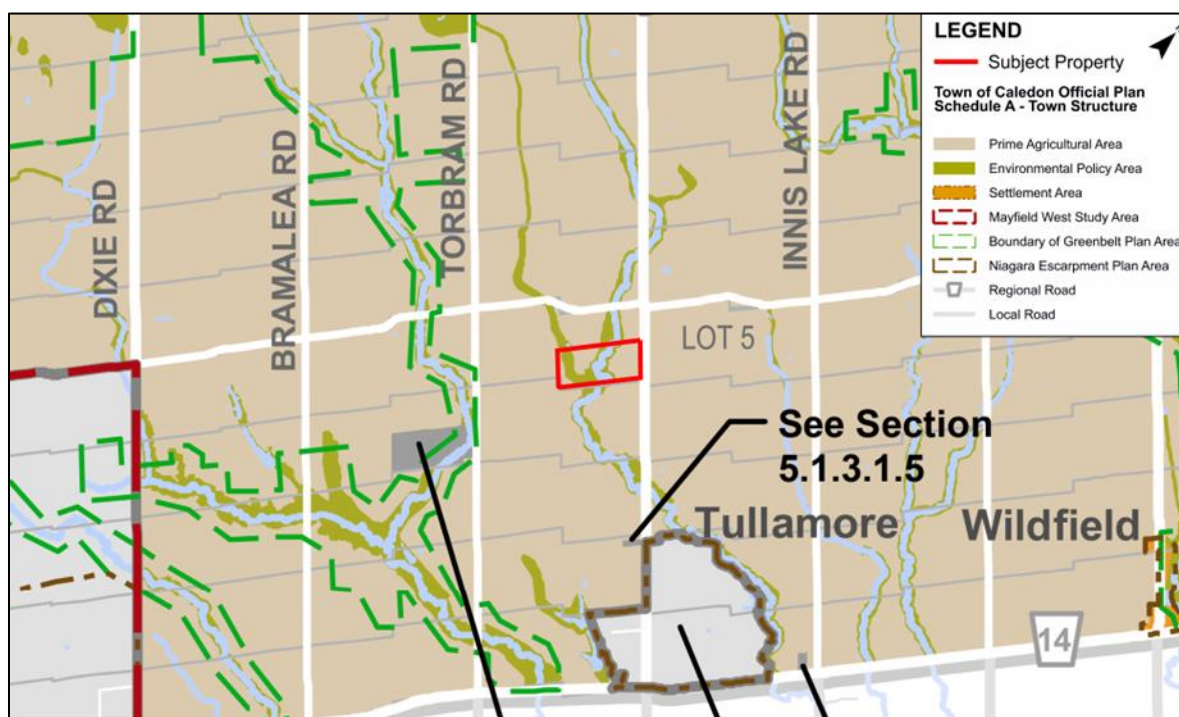
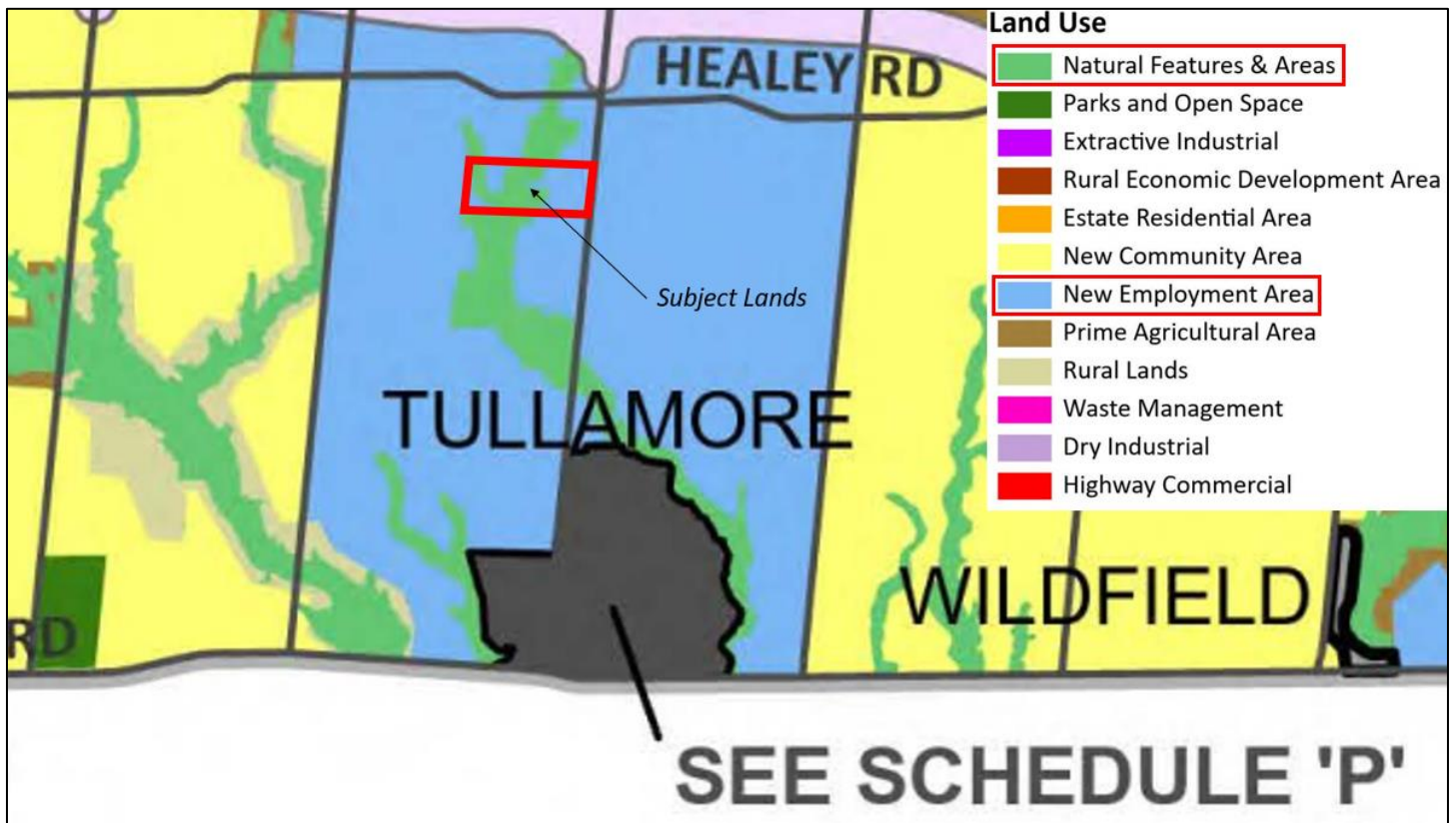


Figure 2: Schedule A: Land Use Plan, Town of Caledon Official Plan

## Draft Future Caledon Official Plan

We note that the Town of Caledon is undertaking the Official Plan Review to guide growth and development within the municipality, including the expansion of the Urban Area Boundary for the purpose of accommodating long-term growth and economic prosperity. The subject lands are designated as *New Employment Area* with a portion of the subject lands designated as *Natural Features & Areas* per Draft Schedule B4 - Land Use Designations of the Draft OP (Figure 3).



**Figure 1: Draft Schedule B4 - Land Use Designations, Draft Future Caledon Official Plan**

The primary objective for lands within the *New Employment Area*, which includes the subject lands, as outlined in the Draft OP is to designate lands to allow employment uses in the future through the development of Secondary Plans. Until the Secondary Plans are prepared, the permitted uses within *New Employment Areas* lands include existing uses and minor expansions to the existing uses at the adoption of the Draft OP and new agricultural uses. We note that the lands within the *New Employment Area* will be further designated into *Prestige Employment Areas*, *General Employment Areas*, and *Knowledge and Innovation Employment Areas*. We also note that dry industrial uses that do not require extension of municipal services or any significant new infrastructure may be permitted within the *New Employment Area*, subject to approval of a temporary use by-law. Based on the proposed land use designations and draft permitted uses for *New Employment Areas*, development on the subject lands will allow for employment opportunities within the newly expanded Urban Area.

**Table 1: Draft Permitted Uses in New Employment Areas of the Draft Future Caledon Official Plan**

Official Plan Designation	Permitted Uses
Prestige Employment	Manufacturing, processing, and warehousing with no accessory outside storage of goods or materials; business offices in stand-alone office buildings; trade and convention centres (may include restaurants and banquet halls); commercial trade schools; ancillary uses within the ground floor of a multi-storey office building (retail, service, restaurant, sports and fitness recreation uses, financial institutions and child care centres); and ancillary uses within a multi-unit industrial building provided the combined floor area of these uses does not exceed 25% of the gross floor area of the

	industrial building (retail, service, restaurant, sports and fitness recreation uses, and financial institutions).
General Employment Area	Manufacturing, processing and warehousing with accessory outdoor storage; equipment and motor vehicle repair garages; institutional uses such as industrial trade schools and training facilities; and business offices as an accessory use to other permitted uses.
Knowledge and Innovation Employment Area	Business offices in stand-alone office buildings or as an accessory use to other permitted uses; hotels (may include restaurants and banquet halls); trade and convention centres (may include restaurants and banquet halls); research and development uses; institutional uses (post-secondary facilities, university and government research stations/facilities and research-based medical facilities); ancillary uses within the ground floor of a multi-storey office building (retail, service, restaurant, sports and fitness recreation uses, financial institutions and child care centre); and ancillary uses within a multi-unit ground-oriented building provided the combined floor area of these uses does not exceed 25% of the gross floor area of the multi-unit building (retail, service, restaurant, sports and fitness recreation uses, and financial institution).

The permitted uses for lands within the *Natural Features & Areas* include forest, fish, and wildlife management; conservation and flood or erosion control projects; essential infrastructure; passive recreation; minor development and minor site alteration; existing uses, buildings or structures; expansions or alterations to existing buildings or structures; accessory uses, buildings, or structures; and, a new single detached residential dwelling on an existing lot. As such, we note that the extent of the natural heritage features and development limit on the subject lands will need to be established through detailed technical studies at the time of future planning applications.

### General Comments

The proposed land use designation of the subject lands for employment uses is consistent with the new Region of Peel's Official Plan, which was adopted on April 28, 2022. As such, we are supportive of the proposed land use designations, as outlined in Draft Schedules B1, B2, B4, and F1, objectives, and policies outlined in the Draft Caledon Official Plan as it relates to the *New Employment Area* and *Natural Features & Areas* within the expanded *2051 Urban Area*, as they pertain to the subject lands. It is our opinion that the proposed employment use and the associated objectives and policies in the Draft OP will promote the efficient use of land and assist to accommodate the forecasted employment growth in the Town of Caledon by 2051.

### Conclusion

We have reviewed the Draft Future Caledon Official Plan schedules and policies and have acknowledged the new designation of the subject lands. Based on the foregoing, we request that the subject lands maintain its intended designation as part of the *2051 Urban Area* and be designated as *New Employment Area* under the Draft Caledon Official Plan. Maintaining this designation will ensure consistency with the recently adopted Peel Region Official Plan, as indicated in Schedules E1 (Regional Structure) and E4 (Employment Areas) of that plan.

We support the *New Employment Area* land use designation for the subject lands and reserve the right to provide further commentary throughout the Official Plan Review process, including the right to provide input on further detailed land use designations for the subject lands.

Thank you for reviewing this request and we look forward to any discussions regarding this matter. If you have any questions regarding the above comments, please contact the undersigned at extension 245, extension 330, or James Todd at extension 345.

Yours truly,

**Weston Consulting**

Per:



Sandra K. Patano, BES, MES, MCIP, RPP  
Vice President



Raj Lamichhane, BArch, MPI, MCIP, RPP  
Planner



## 78. Mark and Kate Honey

October 3, 2023

Mayor Grooves and members of council,

I am a resident of the Town of Caledon and am part of the Caledon East Rural Neighbors group.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centers of a certain size. The size of the out buildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event center while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centers in a 4 km radius. These centers avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit.

Further, these centers are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Milcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income that is to neighbouring farms and community friendly. What has happened with trucking yards is not. What is happening with the event centres now is not.

Our home is located 2.5 km away from MGM event centre and we can no longer enjoy peaceful evenings/nights on weekends. The noise (DJ/music) and fireworks, keeps our dogs barking throughout the night, and in turn our children up. Even with our windows closed, we can hear the base and thumping. The speeding cars and impaired-style driving has also increased on our road during times of the events (not to mention the increase of littering including empty alcohol containers). We have filed numerous complaints with OPP. This makes it a danger to the public and our families. This is not what we moved into rural Caledon for. We moved for nature, peace and quiet. This is unacceptable.

Sincerely yours,

Mark & Kate Honey



## 79. Michael Goulding

Mayor Grooves and members of council,

I am a resident of the Town of Caledon and am part of the Caledon East Rural Neighbors group.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear, based on the existing Official Plan, that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centres of a certain size. The size of the out buildings is significant, based on the size of the property, and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre (located 15903 St Andrew's Road) as an example, the primary use is that of an event centre while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighborhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centres within a 4 km radius. These centres avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit.

Further, these centres are using the OFDU criteria to avoid paying commercial taxes that other such centres, like Royal Ambassador Banquet Centre and Milcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning, was not even aware of the MGM Event Centre and others like it and the fact that the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income in manners that are friendly to neighbouring farms and the community. What has happened with trucking yards is not acceptable. What is happening with the event centres now is not acceptable. A proper plan needs to be put in place to address these issues.

Thank you,

Michael

**Michael Goulding**



Matthew Cory  
905 513 0170 x116  
mcory@mgp.ca

October 2, 2023

MGP File: 22-3154

Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

via email: [carmine.caruso@caledon.ca](mailto:carmine.caruso@caledon.ca) | [steven.burke@caledon.ca](mailto:steven.burke@caledon.ca)  
- [bailey.loverock@caledon.ca](mailto:bailey.loverock@caledon.ca) | [opreview@caledon.ca](mailto:opreview@caledon.ca)

**Attention: Mr. Carmine Caruso, Acting Chief Planner**  
**Mr. Steven Burke, Manager, Strategic Policy**

Dear Mr. Caruso and Mr. Burke:

**RE: Future Caledon Official Plan Review Comments**  
**Mayfield Golf Course Inc. and Tullamore Industrial GP Limited**  
**12552 and 12580 Torbram Road, Caledon, ON**

## 1.0 Introduction

Malone Given Parsons Ltd. (“MGP”) are the planning consultants for Mayfield Golf Course Inc. and Tullamore Industrial GP Limited, who manage three parcels of land located north of Mayfield Road and south of Old School Road on the west side of Torbram Road totalling 91.2 hectares of land (the “Subject Lands”), as shown in Appendix 1. The lands are municipally known as 12552 and 12580 Torbram Road, as well as a parcel of undeveloped land, with no municipal address, directly to the south.

On behalf of Mayfield Golf Course Inc. and Tullamore Industrial GP Limited, we have reviewed the Draft Caledon Official Plan dated August 30, 2023 (the “Draft OP”, or the “Plan”) and provide this letter with our comments on the key policy and mapping matters. It is our opinion that:

- the Draft OP should be one consolidated document;
- structural land use designations can and should be applied at this time on lands;
- the OP should align with the upcoming Provincial Planning Statement; and,
- the environmental mapping should incorporate detailed work where undertaken.

We look forward to working with Staff to address our comments as soon as possible. As we advance further discussions with Staff on the Draft OP, we reserve the right to provide additional comments.

### Context

Our comments are provided against the backdrop of a housing crisis in Ontario and in particular in the Greater Toronto Area. Provincial policy mandates municipalities to align with

provincial priorities for housing and infrastructure and the urgency to build more housing more quickly.

Specifically, Bills passed by the Ontario government in recent years (Bill 23, Bill 97 and Bill 109) have been introduced in order to spur development in order to meet the governments' goal of building 1.5 million homes by 2031.

### **Proposed Redevelopment**

The Subject Lands are envisioned to develop as part of an overall comprehensive development of the block bounded by Torbram Road, Mayfield Road, Old School Road and Bramalea Road. This block was recently brought into the urban boundary as part of the municipal comprehensive review process undertaken by the Region of Peel. A landowners group comprised of neighbouring landowners is being established to advance development within this block on a comprehensive and coordinated basis and address cost-sharing matters.

This area is intended to accommodate a complete community that will support densities that are pedestrian, cycling and transit friendly, and will include a range of low- and medium-density residential uses along with institutional uses and a comprehensive public open space system.

Land use designations that support complete community objectives through the provision of a diverse range of residential options and necessary community and commercial services should be identified in this Official Plan now to provide sufficient planning intent on the lands to allow them to proceed with additional planning as soon as possible. A compact, pedestrian oriented built form that transitions from medium density residential uses generally along the Torbram Road corridor to lower density residential uses is appropriate. A road network that provides a logical and well-connected transportation system that balances connectivity, while minimizing impacts to the significant natural heritage features is also appropriate.

## **2.0 Comments**

### **2.1 Consolidation of the Official Plan into One Document**

It is our understanding that the Town will be undertaking the implementation of the Official Plan in three phases, where the current phase updates the primary sections of the policy document, leaving secondary plans (including land use designations and policies) and site-specific policies to later phases. This will result in a policy situation with a new Official Plan with parts of the current Official Plan remaining in effect. This structure creates a convoluted and confusing policy framework and is unnecessary considering the intent of an Official Plan Review process is to set the foundation for new development and growth, guiding the land use planning decisions that help to achieve a community's vision and goals for the future. Other municipalities that have implemented a multi-volume approach have noted that it creates more confusion, and it has resulted in unnecessary delays in all aspects of planning and development approvals.

There is an opportunity to consolidate the Official Plan into one simplified document that provides clear policy direction and the detailed land use designations that will allow

development to proceed in a timely manner, while still safeguarding community and environmental interests.

We believe that a new approach to Secondary Planning should be adopted by the Town to expedite the delivery of housing. This could be to identify community planning areas in the Official Plan and designate land uses with policies requiring more detailed planning to occur within a community structure plan area concurrent with the preparation of draft plans of subdivision.

This revised process requires amending the Official Plan to reflect this new approach to the new community area/expanded urban boundary. This will streamline the development approvals process without compromising the ability to comprehensively plan the lands within the Town's boundaries.

## **2.2 Land Use Designations and Road Network**

Currently under Policy 4.4.5 of the Draft OP, when lands are to be made available for development as set out in the Growth Management and Phasing Plan, it is required that the Town will initiate a secondary planning process to recommend a secondary plan for approval.

The current proposed process under the Draft OP for the Town to prepare a Secondary Plan will delay the development process of new residential units by multiple years during a time when there is a critical lack of housing supply. In addition, the proposed approach to undertake multiple, complicated Secondary Plan processes will take many years and is predicated on the Town acquiring a vast amount of planners and staff to undertake this work.

To respond to the housing crisis and effect better planning, a modernizing of the planning approvals approach in Caledon is required in a new Official Plan. Conceptual land use designations should be implemented as part of this Official Plan. These designations provide an anticipated structure for New Community areas that will expedite housing delivery and provide the guidance both developers and the public require to understand Council's planning intention for the community through the planning horizon.

The Subject Lands are in a prime location to develop a wider range of housing types that would strengthen and diversify the housing stock in proximity to approved employment lands. Moreover, the development of the Subject Lands would require minimal extension of services from ongoing development of employment lands on the east side of Torbram Road.

Malone Given Parsons Ltd, on behalf of our Clients, have already undertaken a planning exercise for the Subject Lands. It is our opinion that these lands should be conceptually designated to "Residential Area", "Mixed High/Medium Density Residential", "General Commercial", and "Open Space Area" with a Neighbourhood Centre overlay, as shown on the enclosed proposed amendments to the Official Plan schedules (refer to Appendix 2). By designating these lands in the Official Plan, development applications, with appropriate supporting technical studies could proceed as soon as the Plan is approved, ensuring housing is available in as early a timeframe as possible.

The Town has provided a conceptual collector road network for the lands designated as New Community Areas and New Employment Areas in Schedule C1. This conceptual road

network is a simple grid network that does not take into consideration site conditions: namely significant natural heritage features. It is our opinion that a proposed conceptual road network that considers the existing road network as well as minimizes the number and impact of the crossings of the significant natural features is appropriate, and request that the conceptual road network be removed to provide the flexibility for an appropriate road network through a future development review process.

### **2.3 Align with the New Proposed Provincial Planning Statement, 2023**

It is our opinion that the Draft OP should be aligned with the new Provincial Planning Statement (2023 PPS), which we understand will be released later this year. This includes, but is not limited to, removing all reference to the A Place to Grow Growth Plan for the Greater Golden Horseshoe ("Growth Plan"). The proposed 2023 PPS is intended to consolidate the PPS and the Growth Plan. We believe it is important for the Town to remain consistent with this new policy direction of the 2023 PPS.

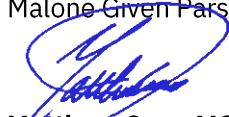
For example, numerous sections throughout the Draft OP directly refer to the Growth Plan as a guiding document for developing relevant policies and schedules. These references should be removed.

### **Conclusion**

We commend staff on their efforts to date and look forward to working with you to conclude the process in a timely manner and bring forward the Caledon Official Plan to Council for approval.

Thank you for the opportunity to provide these comments. We would like to meet with you to discuss the content of this letter and the path forward.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**  
**Principal**

cc: Client



# APPENDIX 1

OLD SCHOOL ROAD

80 Matthew Cory

TORBRAM ROAD

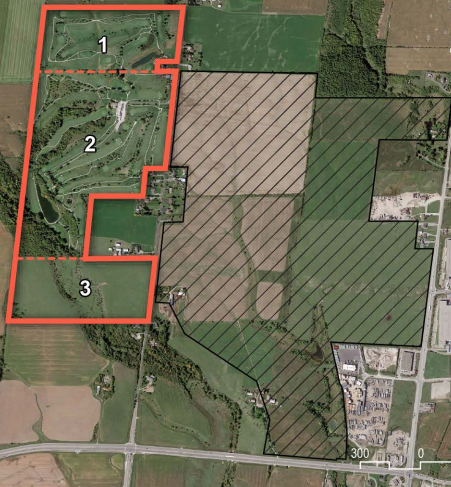
AIRPORT ROAD

DIXIE ROAD

BRAMBLEA ROAD

MAYFIELD ROAD

Google Earth September 2022



**Subject Lands - 12522 & 12580 Torbram Road**

1-2 Mayfield Golf Course Inc.

3 Tullamore Industrial GP Limited



Future Warehouse and Distribution Centre  
(Subject to O. Reg 483/22)

B460

APPENDIX 2



TOWN OF CALEDON

OFFICIAL PLAN

Schedule **B4**

Land Use Designations

Subject Lands

Land Use

- Natural Features & Areas
- Parks and Open Space
- Extractive Industrial
- Rural Economic Development Area
- Estate Residential Area
- New Community Area
- New Employment Area
- Prime Agricultural Area
- Rural Lands
- Waste Management
- Dry Industrial
- Highway Commercial

Other Features

- Refer to 1976 Official Plan
- See Schedules E2 to E11 for Land Use Designations; Wildfield HA
- Highway 413 Transportation Corridor

Amendment

- Residential Area
- Mixed High/Medium Density Residential
- General Commercial
- Open Space



0 500 m

Date of print: 8/29/2023 August 2023  
Sources: Town of Caledon, Region of Peel, Municipality of Peel  
Contains information licensed under the Open Government Licence – Ontario

This map forms part of the Official Plan of the Town of Caledon and must be read in conjunction with the text, other schedules and secondary plans. The boundaries/alignments of designations on this schedule are approximate and are not intended to be scaled.

**DRAFT**

## 81. Jane Thompson

Hello Steve and Bailey,

I am attaching my comments on the August 2023 Draft Official Plan which I filed on October 2, 2023. I would like to bring them to your specific attention and provide some further comments.

My first concern is that in my opinion the draft does not conform with the Region of Peel Official Plan in several important respects:

1. It does not protect valley and stream corridors draining more than 125 ha.
2. It does not protect woodlands greater than 16 ha.
3. It protects only features that have been mapped whereas the Region of Peel official plan protects unmapped features as well.
4. The absence of invasive species is not a criterion in the Region of Peel Official Plan for woodlands in the Core Greenlands System so the presence of invasive species should not be a reason for removing Core Woodlands.
5. The policy to designate 40 ha parcels outside the settlement boundary is not provided for in the Region of Peel Official Plan. It would encourage sprawl and run counter to the basis of the planned urban area.
6. The draft plan does not adequately protect employment areas from conversion to other uses.
7. The draft plan does not provide for implementation in the context of Caledon as a single tier municipality.

It is my request that the adoption of the New Official Plan for the Rural System be deferred until the Town can develop natural environment policies that are specifically appropriate to the Rural System and to aggregate resource areas. The Ecosystem Planning policies would continue to apply in the Rural System pending further consideration.

Please consider the following:

### **Separate Natural Environment Policies for the Rural System:**

The Rural System in Caledon is crisscrossed by 4 Provincial Plans aimed at conservation of natural areas. It stands to reason that the protection in the Rural System should be more robust than the level of protection in the Urban System.

The Natural Environment System policies will profoundly affect the aggregate policy review concurrently underway. That review was triggered by concerns that Caledon's official plan was already too weak. To weaken them further is contrary to Council's intent in enacting the ICBL.

The current draft weakens the protection of the Natural Environment Town wide. I don't think this makes planning sense, particularly in the rural area.

For these reasons I propose that the Town keep the 1976 Plan in effect for the Rural System pending further consideration of the adequacy of the new draft policies for the rural area including aggregate resource areas.

## 81. Jane Thompson

I am open to further discussion of these issues. I would appreciate receiving a response to these comments when you have had a chance to consider them.

Regards,

Jane Thompson





1547 Bloor Street West  
Toronto, Ontario M6P 1A5  
☎ (416) 923-6630  
✉ info@sglplanning.ca

October 11, 2023

Project: CE.CL

**VIA EMAIL**

Steve Burke  
Manager, Strategic Policy Planning  
Town of Caledon  
6311 Old Church Road  
Caledon, Ontario  
L7C 1J6

**Re: Third Draft Caledon Official Plan Comments on Behalf of the Wildfield Village Landowners Group**

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.

In addition to the deputation made by Sierra Horton at the September 19<sup>th</sup> Public Meeting, this letter further summarizes our comments on the Town's third draft Official Plan. We note a number of our comments on the first and second draft Official Plan have been incorporated into the current version and would like to take this opportunity to thank staff for these updates.

Our main comments relate to the Town's draft policies for secondary plans now contained in Section 21.3. Previously Policy 4.5.3 noted that privately initiated secondary plans will not be **"permitted"**. The word "permitted" has been changed to will not be **"supported"** under Policy 21.4.2. Previous Policy 4.5.4, now Policy 21.4.3, has also been altered. While the previous policy noted secondary plans were to be **"initiated and led"** by the Town, the updated policy adds language to state secondary plans are to be **"prepared, led and completed by the Town"**. The policy also now notes "as appropriate, the Town **may consider** the participation of owners and/or developers in the preparation of supporting studies...**at the sole discretion of the Town**".

The Wildfield Village Landowners Group is still very interested in pursuing a hybrid process with the Town, which we have discussed with staff. This hybrid process would include the preparation of background studies (many of which are already completed), as well as the development of the land use plan and secondary plan policies. The involvement of landowners in the preparation of the plan and policies is not noted in the draft Official Plan. With the addition of public consultation and input, we believe this hybrid process would help achieve a unified vision for the lands, provide access to more resources, cut development timelines in half and free up staff resources. We do have concerns regarding the capacity of the Town staff to lead and prepare several secondary plans for the entirety of Caledon's New Urban Area in a timely manner, which is needed in order to contribute to the Provincial and Regional growth forecasts by planning to accommodate 90,000 new residential units.





We understand from your comments at the Public Meeting that currently the Official Plan reflects wording from the Council direction received last June for Town-initiated secondary plans. However, since that time and the various legislative changes that have occurred, the Town is looking to bring forward to Council in November a secondary plan strategy to deal with how the Town intends to address secondary planning work, which would result in amendments to the Official Plan.

We kindly request we are made aware of any secondary plan policy or process changes. We also look forward to reviewing the Town's Growth Management and Phasing Plan next week. Thank you for the opportunity to provide our additional comments.

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

A handwritten signature in black ink, appearing to read 'Paul Lowes', is written over a light blue horizontal line.

Paul Lowes, MES, MCIP, RPP

c.c. Bailey Loverock, Town of Caledon  
Glenn Pitura, Wildfield Landowners Group  
Sierra Horton, SGL Planning & Design Inc.

## 83. Jay Barwell

October 18, 2023

Mayor Grooves and Members of Council,

My name is Jay Barwell, and I am a resident of the Town of Caledon and part of the Caledon East Rural Neighbours group.

I have been made aware of the proposed changes to the draft Official Plan that relate to the On Farm Diversified Use (OFDU). It would appear based on the existing Official Plan that the proposed changes would make it easier for large venue event centres to operate on farm property. The requirement for specific zoning has been removed and proposes that the zoning bylaw be amended to allow event centres of a certain size. The size of the out buildings is significant based on the size of the property and potentially involve 800 plus people and hundreds of vehicles.

The issue of whether this is a secondary use to farming must be considered. Using the existing non-complying MGM Event Centre located 15903 St Andrew's Rd as an example, the primary use is that of an event centre while having the land leased to another farmer. This facility causes significant disruption to farmers and residents in the neighbourhood. Average weekly event revenues exceed \$50,000 per week based on recent quotes. There are 5 such centres in a 4 km radius. These centres avoid applying for town liquor licenses by outsourcing the bar services. Thus, there is no need to apply for an event permit.

Further, these centres are using the OFDU criteria to avoid paying commercial taxes that other such centres like Royal Ambassador Banquet centre and Millcroft Inn pay for example.

We have seen the proliferation of trucking yards and the affects they have on residents and the environment. Steve Burke, the Towns Manager, Strategic Policy Planning was not even aware of the MGM Event Centre and others like it and the fact the town is spending legal resources to fight them. Like the trucking yards, we need to have the foresight and policies in place that prevent these disasters from occurring while allowing legitimate farm operations to diversify their income that is to neighbouring farms and community friendly. What has happened with trucking yards is not. What is happening with the event centres now is not.

Jay Barwell

NOVEMBER 8, 2023

PROJECT NO: 2448-6683

SENT VIA: EMAIL  
BAILEY.LOVEROCK@CALEDON.CA

Town of Caledon  
6311 Old Church Road  
Caledon ON, L7C 1J6

**Attention: Bailey Loverock, RPP**

**RE: 2023 DRAFT FUTURE CALEDON OFFICIAL PLAN (AUGUST VERSION)  
NATURAL HERITAGE REVIEW  
ALLOA LANDOWNERS GROUP**

Dear Bailey,

On behalf of the Alloa Landowners Group, please find attached our comments for the natural heritage related sections of the 2023 Draft Future Caledon Official Plan (August Version). While we acknowledge that the Draft OP schedules are noted as preliminary, it is our expectation that the mapping of natural heritage features on the schedules are also treated as preliminary. There are several occurrences where natural heritage features that are noted on the draft schedules conflict with the actual features that have been mapped, staked, and confirmed on-site by qualified biologists and agencies. As such, we trust that the in-season field work completed by our team working on the Alloa Secondary Plan area would take precedence over the features that are mapped on the Draft OP schedules.

While we understand that we are outside of the commenting period, we do request that confirmation of the process to update the Draft OP schedules to reflect current conditions be confirmed.

If you have any questions or require any further information, please do not hesitate to contact me.

Sincerely,

**C.F. CROZIER & ASSOCIATES INC.**



Michael J. Hensel, OALA, CSLA  
Director

c.c.  
Alloa Landowners Group  
Jason Afonso, Glen Schnarr & Associates Inc.  
Jennifer Staden, Glen Schnarr & Associates Inc.

Enclosure: August 2023 Draft Future Caledon Official Plan Review Matrix

J:\2400\2448 - Alloa Landowners Group\6683 - Alloa Development Area\Letters\2023.11.08 Draft OP Review.docx

84. Michael Hensel  
Comments on August 2023 DRAFT Future Caledon Official Plan  
Alloa Landowners Group 2448-6683

Section No.	Policy	Comment
<b>13. Natural Environment System</b>		
13.3.2	Only those Natural Features and Areas that have been identified are currently mapped and designated Natural Features and Areas. The identification, mapping, and the determination of significance of additional Natural Features and Areas can only be determined after they have been evaluated through a Planning Act process, with the evaluation supported by the Town or the relevant approval authority.	<p>Throughout 2022 and 2023, detailed in-season field investigations were completed by qualified biologists for all participating lands within the Alloa Secondary Plan area, using all widely accepted field protocols. It has been determined that there are some natural features which have been mapped on the Draft OP Schedules which are not present based on the field investigations and background review.</p> <p>Please explain the <i>Planning Act</i> process and provide confirmation that the Draft OP Schedules will be updated to accurately reflect the current conditions documented through completion of Environmental Impact Statements (EIS) prepared to support Planning Act related applications.</p>
13.8.1	Table 13-3 sets out the minimum buffers required from certain components of the Natural Environment System on lands not subject to sections 13.5, 13.6 and 13.7	The proposed buffers are, in some cases, greater than the current OP (i.e., proposed 20 m to significant woodlands instead of current 10 m). Please confirm that Policies 13.9.5-13.9.8 will allow for buffers to be determined through further study, including subwatershed studies and/or Environmental Impact Studies.
13.9.10	<p>Major Landscape Linkages and Local Landscape Linkages were identified in the 2020 Peel Environmental Screening and Scoped Subwatershed Study and are shown in Figures Part D: Natural Environment System, Parks and Open Space Future Caledon Official Plan Page D-24 August 2023 Draft D4a, D4b and D4c. These linkages are required to be implemented through subsequent studies. While their basic location and connections across the landscape are to be maintained, the exact alignment and any minor refinement to width (i.e., above the minimums identified) will be guided by the following:</p> <p>a) Wherever possible, linkages are to follow existing feature pathways.  b) Where natural pathways are not available, minimum distance opportunities for connecting features / areas are to be used.  c) Alignment and width are to be informed by site-specific study which considers target species, anticipated pathways of movement (e.g., using connectivity analysis and/or field evidence).  d) Linkages are to be implemented with minimum widths as identified in this scoped Subwatershed Study. Final widths may be larger than the minimum based on site specific condition (e.g., features, species, etc.).</p>	<p>Major Landscape Linkages and Local Landscape Linkages are not depicted in Figures D4 a, b, and c. It is unclear if and where these linkages have been proposed. Regarding these figures, the OP should have clear language that field verification and subsequent studies should determine the boundaries and existence of any features, and not rely on the 2020 Peel Environmental Screening and Scoped Subwatershed Study (SWS). The figures from the SWS are marked as "preliminary" and should not be considered entirely accurate. Language in the OP should note that the determinations of an EIS should be the ultimate measure of the location and extent of terrestrial and aquatic Greenway linkages.</p> <p>The statement "These linkages are required to be implemented through subsequent studies" does not recognize that these linkages have not been verified on site and therefore the statement should be modified as follows: "If verified by field studies, these linkages are to be implemented through subsequent studies."</p>
13.9.11	Replication of features may be considered through subwatershed studies. Replication is a 'like-for-like' re-creation of habitat on the local landscape and with a net gain to the system achieved through the replication process. In planning for replication, a replacement ratio will be determined through the subwatershed to support a net gain outcome. Compensation may also be considered in circumstances where retaining a feature in-situ in an urbanizing landscape matrix will result in an impact to its form or function that cannot be reasonably mitigated.	Will the Town provide a framework for compensation calculations and cash-in-lieu guidelines? Who will determine acceptable compensation? Town? CA? Region?
13.9.12	The 2020 Peel Environmental Screening and Scoped Subwatershed Study was based on preliminary, high-level observations and mapping which did not lead to specific, detailed recommendations for watercourse and headwater drainage feature management. As a consequence, and through the preparation of the required Secondary Plans and subwatershed studies it is expected that all watercourses and headwater drainage features will be reviewed in accordance with the management approach below:	Watercourses and headwater drainage features have been mapped and characterized on-site by qualified biologists and fluvial geomorphologists. The OP should have clear language that field verification and subsequent studies should determine the significance of watercourse and headwater drainage features, and not rely on the 2020 Peel Environmental Screening and Scoped Subwatershed Study (SWS). The figures from the SWS are marked as "preliminary" and should not be considered entirely accurate.

84. Michael Hensel  
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	<p>a) High-constraint watercourses and their corridors are to be protected in current form and location, with appropriate regulatory setbacks and ecological buffers. Realignment of high constraint watercourses are not permitted [emphasis added]. Minor modification through rehabilitation/enhancement may be permitted at select locations where it provides an enhancement to the system, given sufficient rationale. Minor (local) rehabilitation or enhancement could include such works as replacement of perched culverts with new structures that follow Conservation Authority crossing guidelines, removal of old farm crossings, re-naturalization of armoured channel banks (where appropriate), or local riparian plantings.</p> <p>b) Medium constraint watercourses are to remain open and protected with applicable hazard corridors, regulatory setbacks, and ecological buffers. Channel/corridor realignment (horizontal and vertical) may be permitted where there has been previous disturbance through anthropogenic activity, there is sufficient rationale for doing so, and provided there is a net ecological gain and subject to the approval of appropriate authorities. Restoration and enhancement must be included in design options. Local watercourse realignment/enhancement areas may include impacted, channelized reaches within historically agricultural lands, and upgrades to existing watercourse crossings. Local watercourse realignment/enhancement areas may also be required for portions of some reaches to accommodate new road alignments, to facilitate flood mitigation, or to address a need for enhancement.</p> <p>c) Low constraint watercourses should be re-evaluated as part of the subwatershed study to confirm their constraint ranking. Features may be redesignated as headwater drainage features as a consequence.</p>	
Schedule B4	Land Use	The features on Schedule B4 will need to be updated to accurately reflect the limits of verified features delineated in the field jointly by qualified biologists and Agencies in 2022 and 2023 for the Alloa Secondary Plan Area. Please confirm the process and provide confirmation that the OP Schedules can be updated to accurately reflect the current conditions.
Schedule D1	Natural Environment Systems	There are two areas which appear to be vestigial wooded features which are no longer present. Please confirm the process and provide confirmation that the OP Schedules can be updated to accurately reflect the current conditions.
Schedule D2	Natural and Supporting Features and Areas	The features on Schedule D2 will need to be updated to accurately reflect the limits of features staked in the field jointly by qualified biologists and Agencies in 2022 and 2023 for the Alloa Secondary Plan Area. Please confirm the process and provide confirmation that the OP Schedules can be updated to accurately reflect the current conditions.



## 85. Patrick Pearson

Hi Adam,

I'm not sure if I need a formal letter, but essentially we would like to canvas staff to include the lands in the attached request letter to be included into the settlement area. Or at least, policy allowing this.

You will note that these lands are shown as request #48 in the Regions MCR review memo. Hemson concluded that this request **should be considered subject to additional analysis**. The additional analysis being the following:

- a) that proposed uses cannot be reasonably accommodated within the existing Village, as Inglewood already contains about 4 ha of gross vacant land for development
- b) that proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing Village (Inglewood municipal water system has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system).

We would like to explore this as an option, however, it would be good for the Town to recognise this in their OP review.

Thanks,

Patrick Pearson



April 20<sup>th</sup>, 2022

GSAI File: 932-013

Planning & Development  
Community Services  
6311 Old Church Road  
Caledon, Ontario, L7C 1J6

Attention: Bailey Loverock, MCIP, RPP  
Senior Policy Planner

**Re: Proposed Settlement Area Boundary Expansion  
Town of Caledon Official Plan Update  
15344 Hurontario Street, Town of Caledon  
Formal Comments from Glen Schnarr and Associates Inc.**

Glen Schnarr & Associates Inc. are the planning consultants representing the owners of the above-noted lands (herein referred to as the 'subject lands'). Our client is seeking to provide input on the Town of Caledon's Official Plan review with regards to including the subject lands into the Inglewood Village Settlement Area.

The subject lands are located at the southwest corner of the intersection of Old Base Line Road and Hurontario Street. The existing Inglewood Village Settlement Area boundary is located approximately 200 metres north of the subject lands, across Old Base Line Road. As part of the Region of Peel Municipal Comprehensive Review process, our client had made a request to expand part of the Inglewood Village Settlement Area that is located in the Protected Countryside to accommodate 2 hectares of land, including a 0.35 hectare site, at the intersection of Old Base Line Road and Hurontario. The lands are mostly urban, as they contain a cluster of commercial and residential uses (refer to the enclosed Aerial Context Map for expansion request details).

It was determined that consideration should be given to the settlement area expansion request, subject to further analysis (refer to the enclosed Memo from Hemson Consulting for details). Considering this, we would like to ensure the Town of Caledon's updated Official Plan includes appropriate direction for potential future boundary expansion for the subject lands, subject to the required analysis.



85. Patrick Pearson

**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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Patrick Pearson, MCIP, RPP  
Associate



85. Patrick Pearson

**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

## **Appendix I – Aerial Context Map**



85. Patrick Pearson



**FIGURE 1 - AERIAL CONTEXT MAP**

15344 Hurontario Street, Town of Caledon

- Subject Lands
- Existing Inglewood Village Settlement Area Boundary\* ( $\pm 173.00\text{ha}/427.49\text{ac}$ )
- Proposed Settlement Boundary Expansion ( $\pm 2.13\text{ha}/4.26\text{ac}$ )

\*2021 Settlement Boundary as per Town of Caledon (Schedule M) Inglewood Village and Area Land Use Plan  
-areas and calculations are *approximate only*



Scale: N.T.S.  
January 14, 2021

**GSAI**  
Glen Schnarr & Associates Inc.





85. Patrick Pearson

**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

**Appendix II – Region of Peel Settlement Area Boundary Expansion Memo**



Hemson Consulting Ltd

1000 – 30 St. Patrick Street, Toronto, ON M5T 3A3

416-593-5090 | hemson@hemson.com | www.hemson.com

## MEMORANDUM

**To:** Tara Buonpensiero, Principal Planner, Region of Peel

**From:** Stefan Krzeczunowicz and Russell Mathew, Hemson Consulting

**Date:** January 13, 2022

**Re:** Region of Peel Settlement Area Boundary Expansion: Rural Settlements

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This memorandum discusses the role of rural settlements in accommodating long-term population and employment growth in the Region of Peel. The analysis is being undertaken as part of the Settlement Area Boundary Expansion (SABE) Study component of the Region of Peel's Official Plan review, or municipal comprehensive review (Peel 2051). The main purpose of the SABE Study is to determine the feasibility of and identify the preferred location for new urban lands in the Town of Caledon.

### A. BACKGROUND

As part of the SABE process, technical studies have been undertaken on a broad area in the southern part of Caledon. This area—the Focus Study Area (FSA)—has been previously identified in the SABE process and serves as the basis for determining new urban designated lands to 2041.<sup>1</sup> The FSA is north-west of the rapidly growing City of Brampton and incorporates the settlement areas of Bolton and Mayfield West, which are the focus of Caledon's current and planned-for growth.

The FSA technical studies address, in part, detailed policies for settlement area boundary expansions and municipal comprehensive reviews contained in the Provincial plan for managing growth in the Greater Golden Horseshoe (the Growth Plan).

Schedule 3 of the Growth Plan provides population and employment forecasts for the Region that must be used for planning and managing growth. Recent amendments to Schedule 3, together with an extension of the Growth Plan time horizon for Regional land use planning from 2041 to 2051, have significantly increased the population and employment forecasts for the Region overall and, in turn, the SABE. It is now anticipated that most of the FSA will need

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<sup>1</sup> See Hemson Consulting, *Settlement Area Boundary Expansion Study Phase A: Focus Study Area*, February 2020, and *Settlement Area Boundary Expansion Study: Concept Map and Technical Study Findings*, December 10, 2020.

to be urbanized in order to accommodate new greenfield development after accounting for intensification within the built up areas of the Region.

Most land in Caledon outside the FSA lies within the Greenbelt Area (or Greenbelt), where urbanization is generally discouraged in order to protect the agricultural land base and the ecological features and functions that occur within this landscape.<sup>2</sup>

Nevertheless, while new urban designated lands in the FSA are anticipated to accommodate the major part of Caledon's growth to 2051, there are several settlements in the Greenbelt Area which can accommodate some development and redevelopment on a scale that is appropriate to their size and location. The Region has received several requests to expand the boundaries of these settlements. This memorandum assesses the growth potential of these settlements in the context of Provincial and municipal planning policy, the demand for housing, the supply of vacant land, and the capacity of infrastructure to support growth in the Greenbelt Area.

The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. Thus, with the exception of Bolton and Mayfield West, all settlement areas in Caledon, whether rural settlements or not, are not promoted as locations for growth and development. As such, this study concludes that there is little policy justification for expanding settlement area boundaries in the Greenbelt Area at this time.

Map 1 displays the FSA and Greenbelt Area in Caledon, as well as the Town's settlement areas and the location of Greenbelt Area requests for settlement boundary expansion.

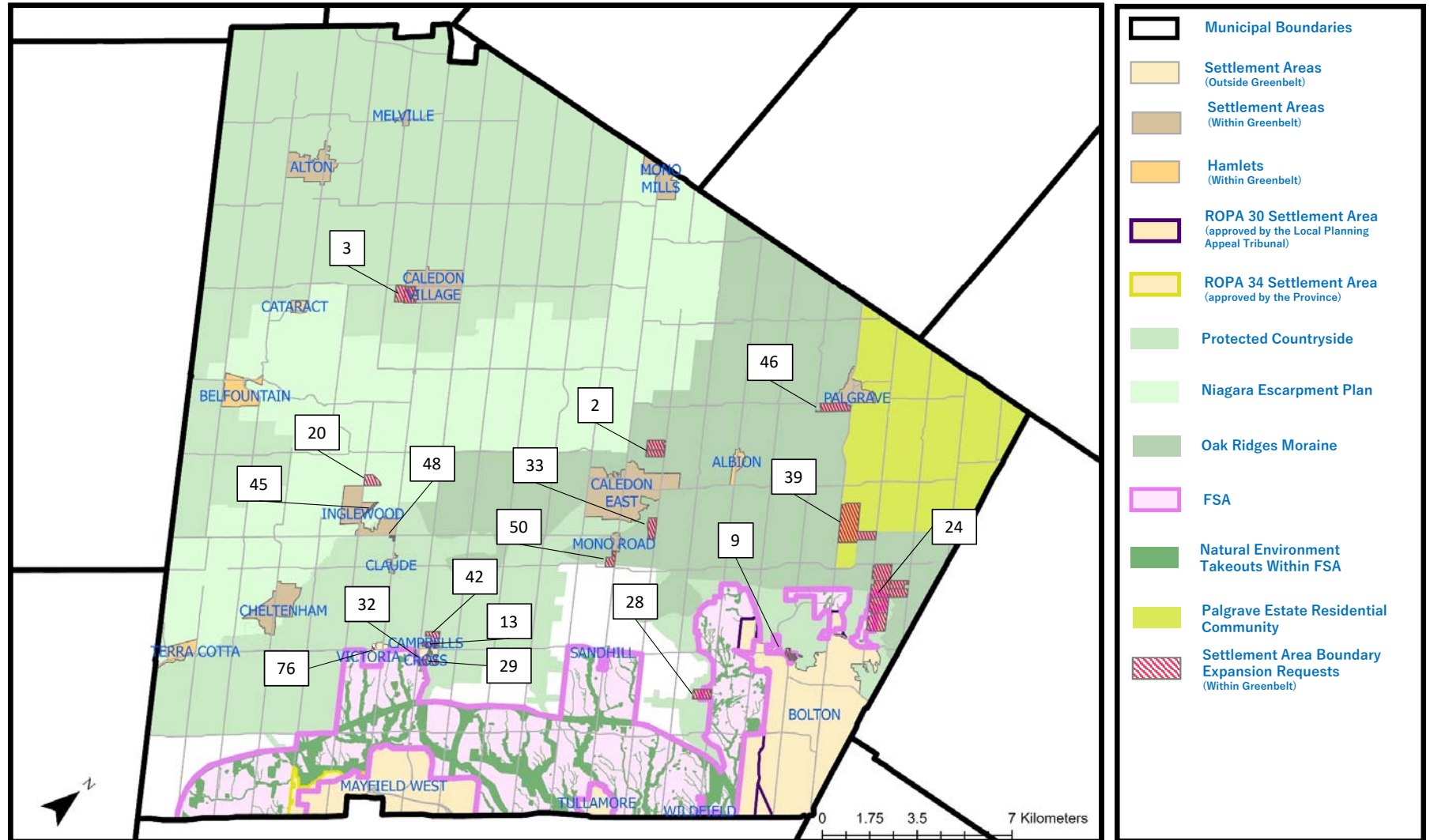
### **B. CALEDON CONTAINS MANY RURAL SETTLEMENTS**

The Town of Caledon is a largely rural landscape, albeit one which is being increasingly shaped by its interface with the rapidly urbanizing parts of the Greater Toronto Area. Thus, while agriculture remains the predominant land use, an increasingly diverse industrial base is developing, including an active aggregate extraction sector. Moreover, while the population of the Town is dispersed throughout the rural area, including a well-established estate residential community and 20 designated settlements, many of them very small, the majority of recent growth has occurred in the Town's two largest settlements—Bolton and Mayfield West. Both are located within the FSA and are planned to be the primary foci for growth to 2051.

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<sup>2</sup> The Greenbelt Area is distinct from the Greenlands System, the Region's term to describe natural environmental areas in Peel, including areas of ecological significance or sensitivity. For more see Region of Peel, *Greenlands System Discussion Paper*, May 2020.

Map 1 – SABE Requests in the Greenbelt Area (GB) of Caledon



## 85. Patrick Pearson

The Region and the Town, through their official plans, establish a hierarchy of settlement for managing growth in the settlements:

- Rural Service Centres are the primary foci for growth. Growth in the centres is planned to occur on full municipal water and wastewater services, in a phased manner, and subject to the financial capabilities of the Region. In addition to Mayfield West and Bolton, the only other Rural Service Centre in the Town is Caledon East. Caledon East's location in the Greenbelt Area, outside the FSA, means that it will experience the least amount of growth of the three Rural Service Centres.<sup>3</sup>
- Villages, which are primarily residential communities built around historic main streets or crossroads. Smaller than Rural Service Centres, the villages provide local goods and services to their residents and the surrounding area as well as limited municipal services and amenities. Water and wastewater services are provided through a combination of municipal, community, and private systems. As such, conditions are generally in place to allow for small scale growth. There are seven villages altogether, and all are located in the Greenbelt Area: Alton, Caledon Village, Cheltenham, Inglewood, Mono Mills, and Palgrave.
- Hamlets, which are small historic residential communities with very limited services. While some hamlets fall within the catchment areas of municipal water and wastewater systems, private well and septic systems still predominate. There are nine hamlets: Albion, Belfountain, Campbell's Cross, Cataract, Claude, Melville, Mono Road, Terra Cotta, and Wildfield. Campbell's Cross and Wildfield are the only hamlets located in or adjacent to the FSA; the remainder lie wholly within the Greenbelt Area. The Region and Town Official Plans envision very little growth in the hamlets.
- Finally, there are three settlements designated as Industrial/Commercial Centres: Victoria, Sandhill, and Tullamore. These are small, mixed-use settlements that provide, at a small scale, a supportive function to Bolton and Mayfield West for industrial and commercial development. All are located in or adjacent to the FSA.

Somewhat outside the settlement framework, the Town is home to a series of unusually large and interconnected estate residential developments in the Greenbelt Area north of Bolton—the Palgrave Estate Residential Community (Palgrave Estates). The community comprises homes on large lots serviced by a municipal water system and private wastewater septic systems. In the Regional context, growth in the Palgrave Estates is slow. However, the growth

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<sup>3</sup> It is noted that as part of Peel 2051 it is proposed that the Rural Service Centres be renamed so as to include them in the Urban System.



rate has been steady for decades and both the Region and Town Official Plans promote continued development of the community over the long-term. There is supply of land in the community to support such growth.

### C. PROVINCIAL PLANNING POLICY DISCOURAGES MAJOR DEVELOPMENT IN RURAL SETTLEMENTS

Land use planning in the Greenbelt Area in Caledon is regulated by a number of complex and overlapping statutes and Provincial and municipal policies and plans. The Region has prepared a number of detailed discussion papers on this policy and regulatory framework as part of its Peel 2051 work. This memorandum focusses on the role settlements in the Greenbelt Area play in accommodating growth and development within that framework.

#### i. *Planning Act* and Provincial Policy Statement 2020 (PPS)

The *Planning Act*, the central piece of legislation in Ontario that governs land use planning, identifies matters of provincial interest that municipal councils must have regard to when making planning decisions. Provincial interests include the appropriate location of development and the promotion of sustainable, transit-supportive development that is oriented to pedestrians and with a built form that is “well-designed, encourages a sense of place, [and] provides for high-quality public spaces”.

The PPS establishes the link between the list of provincial interests and municipal decision making. It provides specific policy direction regarding, among other matters, land use, housing, environmental protection, agricultural lands, economic development and job creation, infrastructure and municipal servicing, and growth management. All planning decisions in Ontario must be consistent with the PPS and municipal official plans are the most important vehicle for implementing its policies.

The PPS requires that the focus of growth and development in Ontario be in “settlement areas” which are built up with development and which exhibit a range of land uses. In the Caledon Greenbelt Area the settlement areas include the Rural Service Centre of Caledon East, as well as the Villages, Hamlets, and Industrial/Commercial Centres described above. The PPS requirement to direct growth and development this way applies in both urban and rural areas. However, in rural areas municipalities must also consider rural characteristics, the scale of development and the provision of appropriate service levels when planning settlement areas. Rural settlement areas must also prioritize intensification, redevelopment, and a compact built form over settlement expansion and, in respect of residential development, must accommodate an appropriate range and mix of housing.

In short, under the PPS growth in rural areas is to be planned to be compact, small-scale, and in keeping with historical patterns.

As part of its direction for developing settlement areas, the PPS includes specific policies that address infrastructure and services. These policies are discussed in more detail below.

### **ii. Provincial Plans and the Growth Plan**

The Province has adopted a body of plans that provide the context within which municipal plans are prepared and implemented. The enabling legislation for these plans, together with the *Planning Act*, requires that all official plans, including the Peel Official Plan, conform to these provincial plans. In assessing rural settlements in Caledon the relevant provincial plans are:

- the Growth Plan, which manages growth in the Greater Golden Horseshoe through, among other things, detailed policies for settlement area boundary expansions and municipal comprehensive reviews. An overarching goal of the Growth Plan is for settlement areas to develop as transit-oriented “complete communities”, where a more compact urban form prevails and people have convenient access to the necessities of daily living. The vast majority of growth and development is to be directed to settlement areas that have existing or planned municipal water and wastewater systems and can support the achievement of complete communities.
- the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan, which collectively manage the Greenbelt Area within the Greater Golden Horseshoe. Unless otherwise prescribed, these plans generally prevail over Growth Plan in the Greenbelt Area of Caledon.<sup>4</sup>

The Growth Plan distinguishes rural settlements from more urban settlement areas. Rural settlements are defined as existing hamlets or similar existing small settlements that are long-established and identified in official plans. They are serviced by individual private on-site water and wastewater systems and contain a limited amount of undeveloped lands that are designated for development. All settlement areas that are defined as hamlets in the Greenbelt Plan, as rural settlements in the Oak Ridges Moraine Conservation Plan, or as minor urban centres in the Niagara Escarpment Plan are considered rural settlements in the Growth Plan. As such, in the Caledon Greenbelt Area all settlement areas are rural settlements, except for Caledon Village, Alton, and parts of Inglewood and Caledon East.

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<sup>4</sup> Detailed conflict provisions are set out in the *Places to Grow Act, 2005*.

The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. Thus, with the exception of Bolton and Mayfield West, all settlement areas in Caledon, whether rural settlements or not, are not promoted as locations for growth and development.<sup>5</sup>

### iii. Greenbelt Plan<sup>6</sup>

The Greenbelt Area in Caledon is broadly divided into three areas: the Oak Ridges Moraine; the Niagara Escarpment; and the Protected Countryside (see Map 1). The Greenbelt Plan regulates the Protected Countryside and permits settlement areas as well as a range of agricultural, environmental, resource and recreational land uses within the Protected Countryside area.

Settlement areas in the Protected Countryside are categorized as:

- Towns/Villages, which are mostly serviced by municipal water and wastewater systems and, as such, are the focus of development and economic and social activity. In Caledon, the Towns/Villages include Caledon Village, Alton, and parts of Inglewood and Caledon East (see Table 1). Inglewood is the only settlement serviced by a municipal wastewater system. A large portion of Inglewood drains to a communal wastewater treatment plant. The rest of the service area drains to the South Peel Lake Based System.
- Hamlets, which are typically serviced by private well and septic systems. Growth in hamlets is discouraged, though limited infill and intensification is permitted subject to appropriate water and wastewater services. Victoria, Campbell's Cross, Claude, Melville, Wildfield, and Mono Mills are the Hamlets identified in the Greenbelt Plan (see Table 1).

Under the Greenbelt Plan, these settlement areas provide a very different role to settlement areas in the fast-growing urban areas of Peel. Their main function is to sustain the Greenbelt, primarily its agricultural areas and its rural lands. When they do grow, they are intended to grow in keeping with their rural and/or existing character. And while they are encouraged to develop into complete communities like more urbanized areas, these settlement areas are not

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<sup>5</sup> It is noted that, under the Growth Plan, rural settlements do not include any designated greenfield areas—lands within settlement areas but outside delineated built-up areas that have been designated in an official plan for development and are required to accommodate the Schedule 3 forecasts.

<sup>6</sup> For more detailed discussion see Region of Peel, *Greenbelt Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.

intended to play a major role in accommodating the growth targets prescribed by Schedule 3 to the Growth Plan.

Settlement areas located outside the Greenbelt are prohibited from expanding into the Greenbelt (Policy 3.4.2.1). As such, Bolton and other settlement areas adjoining the Greenbelt can only expand into lands covered by the FSA. The suitability of such expansion is addressed through the Region's Settlement Area Boundary Expansion technical studies.

The Growth Plan does afford opportunities for expanding settlement areas in the Protected Countryside, but only in the context of a municipal comprehensive review.<sup>7</sup> By insisting on a comprehensive approach, the Growth Plan requires that decisions about settlement boundary expansions be made with reference to growth on a regional scale rather than within any one settlement area or specific site. Moreover, when considering a settlement area boundary expansion a very prescriptive and limiting set of criteria must be applied:

- the settlement area must be identified in the Greenbelt Plan as a Town/Village;
- the proposed expansion must be modest in size, representing no more than a 5 per cent increase in the geographic size of the settlement area based on the settlement area boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area;
- the proposed expansion would support the achievement of complete communities or the local agricultural economy;
- the proposed uses cannot be reasonably accommodated within the existing settlement area boundary;
- the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing settlement area; and
- expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.

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<sup>7</sup> Minor adjustments ("rounding out") to boundaries outside of a municipal comprehensive review are permitted for rural settlements that are located outside the Greenbelt Area.

In short, settlement area boundary expansions in the Protected Countryside are only permitted on a small scale and only if there is specific and concrete evidence that there is insufficient capacity within the settlement area to accommodate the projected growth.

### **iv. Oak Ridges Moraine Conservation Plan (ORMCP)<sup>8</sup>**

The Oak Ridges Moraine Conservation Plan regulates land use within the Oak Ridges Moraine, which covers a substantial part of Caledon's Greenbelt Area. The plan identifies four land use designations within the Moraine: Natural Core Areas, Natural Linkage Areas, Countryside Areas, and Settlement Areas.

Two types of settlement are identified in the ORMCP:

- Settlement Areas, which are intended to focus and contain urban growth and develop as complete communities “permitting a range of residential, commercial, industrial and institutional uses” (Policy 10 (1) 3). Minimizing the encroachment and impact of development in the settlement area on the ecological functions and hydrological features of the Moraine are a priority. Recent amendments to the ORMCP expand the vision for Settlement Areas so that they are encouraged to be accessible by sustainable modes of travel and provide a mix of employment, services, and housing. The development of community hubs and co-location of public services is promoted as is the maintenance and construction of infrastructure to support growth and development (this mirrors similar policies for rural settlements in the Growth Plan). The only settlement area in the ORMCP in Caledon is a portion of Caledon East (see Table 1).
- Smaller Rural Settlements, located within the Countryside Area. In Caledon, the rural settlements are Albion, Mono Road, and Palgrave (see Table 1). They are described as “existing hamlets or similar existing small communities” under ORMCP Policy 10 (1) 4.

The ORMCP permits the expansion of Settlement Areas but does not explicitly authorize Rural Settlement expansion. It defers to the Growth Plan for Settlement Area boundary expansions but prohibits any expansion of Settlement Areas into Natural Core Areas and Natural Linkage Areas. Under the Growth Plan, expansion in the Oak Ridges Moraine must be undertaken as part of a municipal comprehensive review (see above).

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<sup>8</sup> For more detailed discussion see Region of Peel, *Oak Ridges Moraine Conservation Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.



In addition, the ORMCP prohibits the construction or expansion of partial water and wastewater services in the Moraine. The exception to this policy is in the Palgrave Estates, where ongoing residential development is permitted.

### **v. Niagara Escarpment Plan (NEP)<sup>9</sup>**

The Niagara Escarpment, a UNESCO World Biosphere Reserve, covers a significant portion of Caledon's Greenbelt Area. Like the Protected Countryside and Oak Ridges Moraine, the area includes a diverse range of environmental, agricultural, resource, residential, and recreational land uses. However, the sensitivity of ecological and hydrological features and systems in the Escarpment mean that significant environmental protection is warranted. As such, urban development within the NEP Area is generally discouraged.

The NEP designates Minor Urban Centres throughout the Escarpment to recognize existing rural settlements, villages, and hamlets. In Caledon, the Minor Urban Centres include Mono Mills, Cataract, Belfountain, Inglewood, Cheltenham, and Terra Cotta (see Table 1). These settlements are permitted to accommodate growth and development within their existing boundaries provided it does not conflict with existing community character and can be achieved in an environmentally sustainable manner. The range of permitted uses and creation of new lots are to be regulated by municipal official plans.

Settlement boundary expansions require an amendment to the NEP, even if the boundary adjustment does not result in a net gain of the Minor Urban Centre area. Indeed the only boundary adjustment permitted without an NEP amendment is one that would *reduce* the settlement boundary area within the current boundary area. The NEP is updated every 10 years and the last update was in 2017. This policy framework effectively prevents any expansion of the Minor Urban Centres through the Peel 2051 process.

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<sup>9</sup> For more detailed discussion see Region of Peel, *Niagara Escarpment Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.

**Table 1 – Caledon Settlement Designations in Greenbelt Plans and Municipal Plans**

Settlement	Greenbelt Plans			Official Plans	
	Protected Countryside	Oak Ridges Moraine	Niagara Escarpment	Region	Town
<b>Victoria</b>	Hamlet (part)			Rural Settlement	Ind./Commercial Centre
<b>Campbell's Cross</b>	Hamlet (part)			Rural Settlement	Hamlet
<b>Claude</b>	Hamlet			Rural Settlement	Hamlet
<b>Melville</b>	Hamlet			Rural Settlement	Hamlet
<b>Mono Mills</b>	Hamlet		Minor Urban Centre	Rural Settlement	Village
<b>Inglewood</b>	Town/Village (part)		Minor Urban Centre (part)	Rural Settlement	Village
<b>Caledon Village</b>	Town/Village			Rural Settlement	Village
<b>Alton</b>	Town/Village			Rural Settlement	Village
<b>Caledon East</b>	Town/Village (part)	Settlement Area (part)		Rural Service Centre	Rural Service Centre
<b>Mono Road</b>		Rural Settlement		Rural Settlement	Hamlet
<b>Albion</b>		Rural Settlement		Rural Settlement	Hamlet
<b>Palgrave</b>		Rural Settlement		Rural Settlement	Village
<b>Cheltenham</b>			Minor Urban Centre	Rural Settlement	Village
<b>Belfountain</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Cataract</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Terra Cotta</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Wildfield</b>	Hamlet Area			Rural Settlement	Hamlet
<b>Sandhill</b>	Not in Greenbelt Area			Rural Settlement	Ind./Commercial Centre
<b>Tullamore</b>	Not in Greenbelt Area			Rural Settlement	Ind./Commercial Centre

## D. GROWTH IN RURAL SETTLEMENTS ANTICIPATED TO REFLECT HISTORICAL TRENDS

Preliminary growth forecasts undertaken for the Region in 2019 assumed that the Caledon SAGE would need to accommodate additional population of 51,500 and additional employment of 20,400 by 2041. The size of the FSA is approximately 8,000 hectares, about six times larger than the total estimated land need required to accommodate these forecasts.

Changes to Schedule 3 of the Growth Plan, including an extension of the time horizon for Regional land use planning to 2051, have significantly increased the population and employment forecast for the Region overall and, in turn, the SAGE. Current, though preliminary forecasts now require a SAGE large enough to accommodate 183,000 people and 67,700 jobs by 2051. As a result, the majority of the FSA will need to be urbanized in order to accommodate the additional growth.

For people wishing to live in a rural landscape but within a relatively close commuting distance to jobs in Brampton, Mississauga, and other parts of the GTA, Caledon's rural settlements remain desirable places to live. Indeed, it may be expected that commuting times will improve to and from the Greenbelt Area with the construction of the GTA West highway and the urbanization of much of the FSA over the 2051 time horizon. It is therefore perhaps no surprise that several requests to expand settlements in the Greenbelt Area have been received in recent years.

Table 2 below illustrates the pattern of growth in the rural settlements between 2006 and 2016. The table shows that population growth between 2011 and 2016 was four times higher than between 2006 and 2011 and housing growth doubled over the same time period. However, about 70% of all housing growth occurred in Caledon East, the larger Rural Service Centre that contains the Town's administration offices and which, under the Regional and Town Official Plans, is intended to be the focus of most growth and development in the Greenbelt Area.

Outside Caledon East, growth was much slower—about 25 housing units per year over the 10 years, slowing to about 17 units per year between 2011 and 2016.

## 85. Patrick Pearson

Table 2 - Historical Growth in Rural Settlements 2006-2016										
	2006		2011		2016		Growth 06-11		Growth 11-16	
	Pop.	Units	Pop.	Units	Pop.	Units	Pop.	Units	Pop.	Units
Palgrave	2,575	800	2,728	901	2,888	974	153	101	160	73
Sandhill	1,493	474	1,520	479	1,487	456	27	6	(33)	(24)
Cheltenham	402	150	414	154	419	152	12	4	5	(2)
Terra Cotta	767	285	796	291	803	300	29	6	7	9
Victoria	761	235	826	252	765	233	65	17	(61)	(19)
Campbells Cross	308	105	286	97	393	114	(22)	(8)	107	17
Caledon East	3,462	1,129	3,729	1,235	5,309	1,715	267	106	1,581	480
Caledon Village	1,576	490	1,576	500	1,499	491	0	10	(77)	(9)
Alton	1,121	385	1,023	360	1,085	396	(98)	(25)	62	36
Melville	545	175	489	166	531	182	(56)	(9)	42	16
Mono Mills	1,238	405	1,138	409	1,090	392	(100)	4	(48)	(17)
Inglewood	1,079	360	1,203	430	1,180	426	124	70	(23)	(4)
Belfountain	525	190	511	187	525	188	(14)	(3)	14	1
Mono Road	426	143	427	140	436	143	1	(3)	9	3
Claude	402	150	414	154	419	152	12	4	5	(2)
Albion	274	95	270	93	277	94	(4)	(3)	7	2
<b>Total</b>	<b>16,953</b>	<b>5,570</b>	<b>17,349</b>	<b>5,847</b>	<b>19,106</b>	<b>6,407</b>	<b>396</b>	<b>277</b>	<b>1,757</b>	<b>560</b>
<b>Less Caledon East</b>	<b>13,491</b>	<b>4,441</b>	<b>13,620</b>	<b>4,612</b>	<b>13,797</b>	<b>4,692</b>	<b>129</b>	<b>171</b>	<b>177</b>	<b>80</b>

Source: Statistics Canada, Census of Canada 2006, 2011, 2016

Note: Results adjusted to account for dissemination boundary changes.

### i. Growth Management Policy Review

A key focus area of the Peel 2051 process is Growth Management which assesses the potential of various areas of the Region to accommodate the Schedule 3 forecasts. Among the key policy directions of the Growth Management work to date are:

- That the Regional Urban Boundary 2031 reflects the policy intent to guide the majority of growth within the Urban System. In Peel, the Urban System includes only the Cities of Mississauga and Brampton.
- That the Regional Urban Boundary should be updated to include the Rural Service Centres of Mayfield West, Bolton, and Caledon East.
- That the Rural Service Centre policies be moved from the Rural System to the Urban System to reflect their new status as settlement areas, delineated built-up areas, and designated greenfield areas where growth should be directed under the Growth Plan.
- That the remaining lands in Caledon, including the Palgrave Estates, be designated as Rural System and that rural settlements, including Villages, Hamlets and Industrial/Commercial Centres designated in the Caledon Official Plan, be identified in Schedule D of the Regional Official Plan.

## ii. Growth Management Forecasts

Forecasts prepared as part of the Growth Management work assume that housing growth in Caledon East, the rural settlements, the Palgrave Estates, and the remaining rural areas of the Greenbelt Area will continue at historical rates. This is in keeping with the pattern of growth set out in Table 2, recent building permit data, and the expectations of the Region and Town through their official plans and master servicing plans. With the exception of the Palgrave Estates, all settlements are assumed to build out their existing supply of land by 2051. This effectively means that the land needs assessment undertaken for the Region assumes there is no need for additional urban land to accommodate 2051 growth.

This assumption accounts for a large subdivision, about 1,000 units, approved for development in Caledon East which is anticipated to be constructed within the first half of the 2051 time horizon.

Table 3 below summarizes the housing growth assumptions used in the Regional growth forecasts for the lands in the Greenbelt Area. All housing is assumed to take the form of single detached units. This assumption should be tempered by a robust planning policy framework which encourages more higher density built forms in the rural settlements over time. If realized, this would reduce the land needed to accommodate the forecast housing growth.

Table 3 – Forecast Housing Growth in Region of Peel Greenbelt Area 2021-2051			
	2021 Housing Supply Estimate	2021-2051 Forecast Unit Growth	Average Units Per Year 2021-2051
Rural Settlements (less Caledon East)	510	510	17
Caledon East	1,100	1,100	37
Palgrave Estates	1,000	1,000	33
Greenbelt Other	150	150	5

Source: Hemson Consulting



## E. KEY INFRASTRUCTURE AND SERVICES ARE ALREADY IN PLACE

A key factor in evaluating when assessing the development potential of the rural settlement areas is their ability to provide water and wastewater services, as well as other infrastructure and public service facilities and amenities required to sustain a complete community.

### i. Water and Wastewater

The PPS outlines a servicing hierarchy for planning water and wastewater services. The preferred form of servicing settlement areas is systems owned and operated by municipalities. Where municipal systems exist in settlement areas, intensification and redevelopment must be prioritized in order to optimize their use.

Where municipal systems are not available or feasible, private communal services are preferred for multi unit/lot development. Least preferred in the servicing hierarchy are individual on-site services—private wells and septic systems—that are owned, operated, and managed by individual landowners, as well as partial services. These systems are permitted only when site conditions are suitable and there are no resulting negative impacts to natural heritage features and water systems. In settlement areas, their use is restricted to accommodating infill and minor rounding out of existing development.

Overall, the PPS promotes development in settlement areas on municipal services. Within this framework, excess capacity within existing systems is given priority in order to promote the efficient use of infrastructure. The Growth Plan reinforces the PPS by directing that growth be limited in settlement areas not serviced by existing or planned water and wastewater systems.

The Growth Plan also contains a number of policies that require settlement area boundary expansions to address infrastructure capacity and, in doing so, supports the PPS servicing hierarchy. Specifically, the feasibility and most appropriate location for expansion must account for whether there is sufficient capacity in existing and planned infrastructure to accommodate the forecast growth and whether:

- the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate; and
- the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water.

## 85. Patrick Pearson

In June 2020, Regional staff released a report on municipal groundwater systems in Caledon's Greenbelt Area.<sup>10</sup> Highlights of the report include:

- The Greenbelt Area is well serviced by four municipal water systems. Of the settlements identified in Table 1 above, only two—Belfountain and Cataract—are not serviced by a municipal water system and are dependent on individual private wells.
- There are only two municipal wastewater systems in the Greenbelt Area—in Caledon East and part of Inglewood.
- While the Region has received requests to allow communal servicing in the Greenbelt Area the report noted that “this does not align with the Region’s existing or planned policy direction which could potentially expose municipalities to significant financial, public health and safety risks over the lifetime of the services.”
- Capital investment is required in some systems to mitigate the risk of system redundancy and maintain infrastructure in a state of good repair. It is noted that in making decisions about settlement area boundary expansions, the Growth Plan requires that the Region consider whether the infrastructure needed would be financially viable over the full life cycle of these assets.
- Current and projected growth—based on projections that are slightly lower than those set out in Table 3—can generally be serviced by existing municipal water systems. That said,
  - Growth in Caledon East, coupled with efficiency decline, requires construction of a new well in Caledon East and capacity increase in Palgrave in order to meet long-term needs in the Caledon East-Palgrave System.
  - No additional works are required in the near future to accommodate growth-related needs in the Alton-Caledon Village and Cheltenham-Terra Cotta Systems.
  - The Inglewood system is operating very close to capacity and will require interconnection to adjacent systems to accommodate growth.

Despite this report, the Region’s long-term capital forecasts (to 2041) do not currently contemplate any growth-related expansion to the municipal water and wastewater systems in the Greenbelt Area.

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<sup>10</sup> *Servicing Update of Groundwater-Based Drinking Water Systems*, Region of Peel Staff Report, 25 June 2020.

### ii. Public Services Facilities

The Growth Plan encourages municipalities to plan for a variety of cultural and economic opportunities within rural settlements to serve the needs of rural residents and area businesses. It also requires that in determining the feasibility and most appropriate location for settlement boundary expansions the Region consider that the public service facilities needed would be financially viable over the full life cycle of these assets. Public service facilities in rural settlements are encouraged to be co-located and integrated in community hubs, with priority given to maintaining and adapting existing facilities where feasible.

Although focussed on the FSA, the SABE Public Facilities Technical Study provides detailed information on public service facilities that might be required for rural settlements.<sup>11</sup> It notes that:

- The Greenbelt Area is reasonably well serviced with libraries and indoor recreation facilities. The Town offers recreation and leisure programming and services at the Caledon Community Complex, in Caledon East, and the Victoria Parks Community Centre, in the rural area at the Town's northern boundary. The former includes two indoor rink facilities. Caledon Public Library operates branches in Belfountain, Caledon East, Caledon Village, Inglewood, and in the rural area (the Alton branch). Initial planning is underway to relocate the Caledon East library branch to the Caledon Community Complex.
- While travel times to these facilities are longer than in the more urbanized areas to the south the distribution of the branches, coupled with their total floor area, likely mean that service levels provided to residents in the Greenbelt Area are not too dissimilar to those provided to the south of Caledon.
- In 2019, a "divisional model" for co-ordinating fire and paramedic services in Caledon was adopted by the Town. Fire station expansions planned for Caledon Village, Palgrave, Mono Mills, and Alton, over the next decade will be required to achieve NFPA Fire Response Standards in the Greenbelt Area. No similar facility expansion for paramedic services is contemplated in the Greenbelt Area over the same time period.
- School enrollment as a percentage of capacity varies considerably within the Greenbelt Area, anywhere from 50% to 119%, which is evidence of school coverage that is somewhat disconnected to school needs.

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<sup>11</sup> *Region of Peel Public Facilities Technical Study*, Monteith Brown and Hemson Consulting, June 2020.

## F. FORMAL REQUESTS FOR EXPANSION HAVE BEEN RECEIVED

The Region has received several formal requests to expand rural settlements and settlement areas in the Greenbelt Area. Table 4 summarizes these requests in light of the Provincial policy framework and municipal planning principles and infrastructure/servicing conditions discussed above. Map references shown in the table can be cross-referenced with Map 1.

This memorandum was released on the region's Settlement Area Boundary Expansion Study webpage on December 10, 2020. On February 9, 2020 the Region consulted with landowners who had made rural settlement boundary expansion requests on the memorandum findings. Follow up meetings were subsequently held with individual landowners upon request.

## G. CONCLUSIONS AND RECOMMENDATIONS

Based on the above consultation and analysis the following conclusions can be made:

- The Provincial planning policy framework requires that expansions to settlement boundaries in the Greenbelt Area be done through a municipal comprehensive review. The Growth Plan specifically requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area.
- While significant growth is planned for Caledon over the next 30 years to 2051—220,000 persons and 98,000 jobs—the most appropriate location for development associated with that growth is as intensification within existing settlement areas and in the SABE area(s) to be located within the FSA.
- Through numerous technical studies as part of the SABE work, it has been determined that the most appropriate location for settlement boundary expansion in Caledon to accommodate housing is in the form of a logical and contiguous expansion of Bolton and Mayfield West.
- There exists, within the Greenbelt Area, a network of settlements, including a large Rural Service Centre in Caledon East and several villages and hamlets, as well as an extensive estate residential community, where small-scale growth has occurred in recent years and is planned for under the current official plans and in the Peel 2051 growth forecasts, consistent with the Provincial policy framework.
- Under the Growth Plan, the main function of settlements located in the Protected Countryside is to support agricultural areas and rural lands in the Greenbelt. They are not intended to play a major role in accommodating growth and development.

## 85. Patrick Pearson

- It is assumed that growth in these areas will continue at the same, or slightly faster rate than in recent decades, in keeping with the longstanding pattern, the scope of services available in these settlements, and the limited ability to develop “complete communities” as defined by the Growth Plan.
- Settlements in the Greenbelt Area will collectively continue to provide a suitable range and mix of housing forms and lifestyle options to residents, from estate residential homes in the Palgrave Estates and elsewhere, to traditional subdivisions, to denser housing in infill lots and as intensification. The Region should promote increasing the range and mix of housing to allow existing residents to “age in place” in these communities.
- Generally, there is sufficient supply of lots in existing village and hamlet settlements to accommodate the forecast demand for housing over the long-term without the need to expand settlement area boundaries.
  - The exception may be Caledon East, which has a ready supply of developable land but has demonstrated high growth in recent years and has approved a 1,000 unit subdivision with units under construction. The Region should consider whether the current Caledon East settlement area boundary is sufficient to meet market demand and the settlement’s emerging status as a settlement area in the Regional Urban System.

### **i. Requests for Settlement Boundary Expansion in Greenbelt Area**

- The Provincial Greenbelt Plans restrict the Region from approving many of the requests for settlement area boundary expansion set out in Table 4:
  - Without an amendment to the Niagara Escarpment Plan, the expansion of settlement areas in the Niagara Escarpment Plan area is prohibited (see Requests 20 and 45).
  - The expansion of settlement areas into Natural Linkage Areas and Natural Core Areas of the ORMCP Area is prohibited under the ORMCP (see Requests 24, 46, 33, and 50).
  - The expansion of a settlement into the Greenbelt Area from a settlement located outside the Greenbelt Area is prohibited (see Request 9).
  - The expansion of designated Hamlets into the Protected Countryside is prohibited (see Requests 13, 29, 42, and 76).
  - The expansion of a designated Town/Village into the Protected Countryside must conform to Growth Plan Policy 2.2.8.3 k) (see Requests 3, 2, 46, and 48).



## 85. Patrick Pearson

- Requests for settlement boundary expansion from existing settlement areas into the FSA should be addressed through the Peel 2051 SABE process (see Requests 32, 24, 9, and 28).
- It is recommended that the Regional Official Plan continue to designate the Palgrave Estate Residential Community based on the current approved boundary in the Region of Peel and Town of Caledon Official Plans (see Request 39).

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Overall, the analysis demonstrates that rural settlements should play a limited role in accommodating population and employment growth in Caledon to 2051. The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. The land needs assessment undertaken under Growth Policy 2.2.1.5, together with the SABE technical studies, demonstrate that there are sufficient opportunities to accommodate the growth forecast for the Region through intensification, in existing designated greenfield areas, and in the Caledon SABE area located within the FSA.

As such, with the exception of Request 48, there is little justification for expanding settlement area boundaries in the Greenbelt Area at this time.

Table 4 – Summary of SABE Requests in Greenbelt Area

Map 1 Reference <sup>1</sup>	Settlement Area	Applicable Plan	Comments	Recommendation
2  16494 Innis Lake Road	Caledon East	Oak Ridges Moraine Conservation Plan (Countryside Area)	<p>Request to consider expansion of Caledon East to accommodate a 38 hectare property (two land parcels) at 16494 Innis Lake Road and to resolve an outstanding LPAT appeal. Property is located in the Countryside Area of the ORMCP Area. Property is not attached to current settlement area boundary but is separated from Caledon East by the 62 hectare George Crescent estate residential subdivision. Owner proposes that this subdivision also be included in the proposed expansion to reflect existing settlement pattern. As such, the total area of the proposed expansion is 100 hectares.</p> <p>Proposal exceeds the maximum permissible expansion under Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. It is also noted that the George Crescent estate residential subdivision predates the establishment of the Greenbelt Area.</p>	Deny request

<sup>1</sup> Map 1 only shows requests within the Greenbelt Area. For SABE requests outside the Greenbelt Area please refer to Hemson Consulting, *Settlement Area Boundary Expansion Study: Final Concept Map and Fiscal Impact Analysis*, September 2, 2021.

## 85. Patrick Pearson

3  O and 2785 Charleston Sideroad	Caledon Village	Greenbelt Plan (Protected Countryside)	<p>Request to expand Caledon Village to accommodate 12 hectares of land for residential uses on Charleston Sideroad. Land contains a disused gravel pit with an active extraction license and abuts 24 hectares of land under same ownership and already designated for residential uses in the settlement area. A rehabilitation plan for the entire site (44 hectares, including 8 hectares which are proposed to remain in the Greenbelt) is required under the <i>Aggregate Resources Act</i> (AIA). Owner proposes a plan of subdivision in lieu of a rehabilitation plan, with subdivision containing 25 estate residential lots within expansion area, together with a stormwater pond, public park, and local roads. The lots comprise ~50% of the expansion area; Caledon Village settlement area is ~257 hectares.</p> <p>Proposal exceeds the maximum permissible expansion under Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. Additional study also required to determine whether proposed uses support achievement of a complete community, including providing a suitable range and mix of housing options, and cannot reasonably be accommodated within the existing settlement area.</p> <p>As well, proposed settlement expansion is adjacent to a property that has an active aggregate licence. Justification demonstrating that the proposed expansion would not preclude or hinder the continued use of the mineral aggregate operation and that expansion would not be</p>	Given the technical work required to assess appropriate rehabilitation of the site, request should be considered premature.
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## 85. Patrick Pearson

			incompatible for reasons of public health, public safety or environmental impact is required.	
9  Multiple addresses	Bolton	Greenbelt Plan (Protected Countryside)	<p>Request to expand Bolton settlement area into Protected Countryside of Greenbelt Area. Lands comprise 14 hectares along Chickadee Lane, King Street, and Glasgow Road, of which 4.7 hectares lies within Greenbelt Area and remainder lies within FSA.</p> <p>Requires expansion into the Greenbelt Area from a settlement located outside the Greenbelt, which is prohibited under Policy 3.4.2.1 of the Greenbelt Plan. Area within FSA has been studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). Adjoining lands in FSA under same ownership were recently approved for inclusion in Bolton settlement area by LPAT Order dated 10 November, 2020.</p>	<p>Deny request for lands within the Greenbelt Area.</p> <p>For lands within the FSA, request has been resolved by LPAT Order dated 10 November, 2020.</p>
13  3540 and 3264 King Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request to expand Campbell's Cross to accommodate ~28 acres of land south of King Street to construct 18 homes. Lands are located within the Protected Countryside, east of Kennedy Road, south of King Street, and west of the Herb Campbell Public School. Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request
20  15983 – 16069	Inglewood	Niagara Escarpment Plan	Request to "round out" Inglewood Settlement Area to accommodate ~10 residential lots and parkland at 15983 McLaughlin Road (adjoining parcels at 15999 and 16069 McLaughlin Road are under same ownership but do not form part of the request). Requires amendment to the NEP, and Region is not contemplating requesting such an	Deny request

## 85. Patrick Pearson

McLaughlin Road			amendment at this time. Inglewood already contains about 4 ha of gross vacant land for development. As well, Inglewood municipal water system has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system.	
24  Multiple addresses	Bolton	Oak Ridges Moraine Conservation Plan (Natural Linkage Area) AND Greenbelt Plan (Protected Countryside)	Request to consider 5 parcels of land that are partially within the FSA north-west of Bolton, within the east Bolton “finger”, and extend into Natural Linkage Area of the Oak Ridges Moraine Conservation Area as well as Protected Countryside under the Greenbelt Plan. Total land area is 162.6 hectares. Area within FSA has been extensively studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). ORMCP prohibits settlement area expansion into Natural Linkage Areas. Greenbelt Plan Policy 3.4.2.1 prohibits expansion into the Greenbelt Area from a settlement located outside the Greenbelt.	Deny request for lands within the Greenbelt Area.  For lands within the FSA, request should be addressed through Peel 2051 SABE process.
28  13464 The Gore Road	Bolton	Greenbelt Plan (Protected Countryside)	Request to consider expansion of the Bolton settlement area to include of 24 hectares of land west of Bolton at 13464 The Gore Road. Land parcel is split between the FSA (12.8 hectares) and the Protected Countryside in the Greenbelt Area (11.1 hectares).	Request in respect of lands within Greenbelt Area withdrawn by landowner.
29  13945 Kennedy Road	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request expand Campbell's Cross to include 5.8 hectare land parcel at 13945 Kennedy Road. Parcel is split between FSA (3.4 hectares) and Protected Countryside in the Greenbelt Area (2.4 hectares). Proposal is to construct lots for rural residential single family homes except on Greenbelt Area lands. Area within FSA has been extensively studied	Deny request for lands within the Greenbelt Area.



## 85. Patrick Pearson

			through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	For lands within the FSA, request should be addressed through Peel 2051 SABE process.
32 8 Victoria Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request that part of a property at 8 Victoria Street (0.1 hectares), currently zoned for agricultural uses, be brought into Campbell's Cross. Expansion area falls within the FSA and been extensively studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made).	Request should be addressed through Peel 2051 SABE process.
33 15430 Innis Lake Road	Caledon East	Oak Ridges Moraine Conservation Plan (Natural Core Area)	Request to expand Caledon East to accommodate a property at 15430 Innis Lake Road. Property is not attached to Caledon East and is located within a Natural Core Area of the ORMCP area. The ORMCP prohibits settlement area expansion into Natural Core Areas.	Deny request
39 15731 Highway 50	n/a (Palgrave Estate Residential Community)	Oak Ridges Moraine Conservation Plan (Countryside Area)	Request to expand the Palgrave Estates boundary within the ORMCP to incorporate a portion of the Glen Eagle Golf Club. Land parcel is 118 hectares, of which expansion portion is 21 hectares.  Section 14.1 of the ORMCP permits residential development in the Palgrave Estates "subject to the Town of Caledon Official Plan". The subject land is currently designated Countryside Area in the Regional and Town Official Plans and mapping. The current Palgrave Estates	Deny request on the basis that the Region and Town are implementing the long-established boundaries of an approved Palgrave

## 85. Patrick Pearson

			boundary was established based on the existing Town Palgrave Estates designation as adopted by Caledon Council, identified in the Regional Official Plan, and approved by the Province. Major development in the Countryside Area (the creation of four or more lots) is not permitted under the ORMCP.	Estate Residential Community that is consistent with the ORMCP.
42  3634 King Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request to expand Campbell's Cross Settlement Area to accommodate 24.3 hectares of land north of King Street. Land are located within the Protected Countryside. Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request
45  0 and 15707 McLaughlin Road	Inglewood	Niagara Escarpment Plan	Request to include 3.31 hectares of land at "0" McLaughlin Road, plus smaller adjoining land parcels owned by the Town (a stormwater management pond) and Region (a water pumping station) in the Inglewood settlement area. Requires amendment to the NEP, and Region is not contemplating requesting such an amendment at this time. Inglewood already contains about 4 ha of gross vacant land for development. As well, Inglewood municipal water system has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system.	Deny request
46  8575 Patterson Sideroad	Palgrave	Oak Ridges Moraine Conservation Plan (Countryside Area and	Request to expand Palgrave to the south to accommodate ~16 hectares of a 32.4 hectare site between Highway 50 and Duffy's Lane. Although the land has a house and some ancillary buildings, agricultural uses and natural heritage features predominate. Landowner states that the land	Deny request

## 85. Patrick Pearson

		<p>Natural Core Area)</p> <p>is not suited for agricultural uses because of a prior mineral aggregate operation; as such, residential uses are proposed.</p> <p>The entire site is roughly divided evenly between Countryside Area and Natural Core Area under the ORMCP. Expansion into the Natural Core Area part is prohibited. Only that portion of the site that falls within the Countryside Area forms part of the request. Palgrave is designated as a Rural Settlement (<i>not</i> a Settlement Area) in the ORMCP and the Regional Official Plan, and as a Village in the Caledon Official Plan. While the ORMCP permits the expansion of Settlement Areas it does not explicitly authorize Rural Settlement expansion. As such, approval of an expansion to Palgrave would be contingent on the Province amending the ORMCP legislation to permit the expansion.</p> <p>Notwithstanding the above legislative amendment, the proposal would have to conform to Growth Plan policy 2.2.8.3 k) ii, which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. The Palgrave Rural Settlement, outside the Palgrave Estate Residential Community, is ~75 hectares in size; the lands in question are ~16 hectares.</p> <p>Moreover, Growth Plan policy 2.2.8.3 k) ii, requires that the proposal support the achievement of complete communities and not reasonably be able to be accommodated in the existing Palgrave settlement area. As well, the proposed development must be serviced by existing</p>	
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## 85. Patrick Pearson

			<p>municipal water and wastewater without impacting future intensification opportunities in Palgrave. In this respect, Regional staff have stated that growth in the Caledon East-Palgrave water system, coupled with efficiency decline, requires a new well in Caledon East and capacity increase in Palgrave in order to meet long-term needs.</p>	
<p>48</p> <p>15344 Hurontario Street</p>	Inglewood	<p>Greenbelt Plan (Protected Countryside)</p>	<p>Request to expand part of the Inglewood Village Settlement Area that is located in the Protected Countryside to accommodate 2 hectares of land, including a 0.35 hectare site, at the intersection of Old Base Line Road and Hurontario. The lands are mostly urban, as they contain a cluster of commercial and residential uses.</p> <p>Proposal meets test of Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. Proposal is modest in size and full development of the lands for residential and non-residential uses would contribute to a complete community.</p> <p>Additional analysis required to confirm a) that proposed uses cannot be reasonably accommodated within the existing Village, as Inglewood already contains about 4 ha of gross vacant land for development and b) that proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing Village (Inglewood municipal water system</p>	<p>Consider approving request subject to additional analysis (see left).</p>

## 85. Patrick Pearson

			has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system).	
50  15070 Airport Road	Mono Road	Oak Ridges Moraine Conservation Plan (Natural Linkage Area)	<p>Request to expand Mono Road to accommodate a 15 hectare site at 15070 Airport Road which is currently occupied by a horticultural nursery (Glen Echo Nursery). Site is separated from the settlement area by a smaller property which also forms part of the expansion request. Landowner proposes a mix of uses on the site “to fully realize its development potential”.</p> <p>Mono Road is designated as a Rural Settlement in the ORMCP and the Regional Official Plan, and as a Hamlet in the Caledon Official Plan. Landowner has confirmed that site is located within a Natural Linkage Area of the ORMCP area. ORMCP prohibits settlement area expansion into Natural Linkage Areas.</p>	Deny request
76  Part lot 28 Con 1 WHS, King Street West	Victoria	Greenbelt Plan (Protected Countryside)	Request to expand Victoria Settlement Area to accommodate a land parcel north of King Street. Parcel is located within the Protected Countryside. Victoria is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request





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## MEMORANDUM

**To:** Tara Buonpensiero, Principal Planner, Region of Peel

**From:** Stefan Krzeczunowicz and Russell Mathew, Hemson Consulting

**Date:** January 13, 2022

**Re:** Region of Peel Settlement Area Boundary Expansion: Rural Settlements

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This memorandum discusses the role of rural settlements in accommodating long-term population and employment growth in the Region of Peel. The analysis is being undertaken as part of the Settlement Area Boundary Expansion (SABE) Study component of the Region of Peel's Official Plan review, or municipal comprehensive review (Peel 2051). The main purpose of the SABE Study is to determine the feasibility of and identify the preferred location for new urban lands in the Town of Caledon.

### A. BACKGROUND

As part of the SABE process, technical studies have been undertaken on a broad area in the southern part of Caledon. This area—the Focus Study Area (FSA)—has been previously identified in the SABE process and serves as the basis for determining new urban designated lands to 2041.<sup>1</sup> The FSA is north-west of the rapidly growing City of Brampton and incorporates the settlement areas of Bolton and Mayfield West, which are the focus of Caledon's current and planned-for growth.

The FSA technical studies address, in part, detailed policies for settlement area boundary expansions and municipal comprehensive reviews contained in the Provincial plan for managing growth in the Greater Golden Horseshoe (the Growth Plan).

Schedule 3 of the Growth Plan provides population and employment forecasts for the Region that must be used for planning and managing growth. Recent amendments to Schedule 3, together with an extension of the Growth Plan time horizon for Regional land use planning from 2041 to 2051, have significantly increased the population and employment forecasts for the Region overall and, in turn, the SABE. It is now anticipated that most of the FSA will need

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<sup>1</sup> See Hemson Consulting, *Settlement Area Boundary Expansion Study Phase A: Focus Study Area*, February 2020, and *Settlement Area Boundary Expansion Study: Concept Map and Technical Study Findings*, December 10, 2020.

to be urbanized in order to accommodate new greenfield development after accounting for intensification within the built up areas of the Region.

Most land in Caledon outside the FSA lies within the Greenbelt Area (or Greenbelt), where urbanization is generally discouraged in order to protect the agricultural land base and the ecological features and functions that occur within this landscape.<sup>2</sup>

Nevertheless, while new urban designated lands in the FSA are anticipated to accommodate the major part of Caledon's growth to 2051, there are several settlements in the Greenbelt Area which can accommodate some development and redevelopment on a scale that is appropriate to their size and location. The Region has received several requests to expand the boundaries of these settlements. This memorandum assesses the growth potential of these settlements in the context of Provincial and municipal planning policy, the demand for housing, the supply of vacant land, and the capacity of infrastructure to support growth in the Greenbelt Area.

The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. Thus, with the exception of Bolton and Mayfield West, all settlement areas in Caledon, whether rural settlements or not, are not promoted as locations for growth and development. As such, this study concludes that there is little policy justification for expanding settlement area boundaries in the Greenbelt Area at this time.

Map 1 displays the FSA and Greenbelt Area in Caledon, as well as the Town's settlement areas and the location of Greenbelt Area requests for settlement boundary expansion.

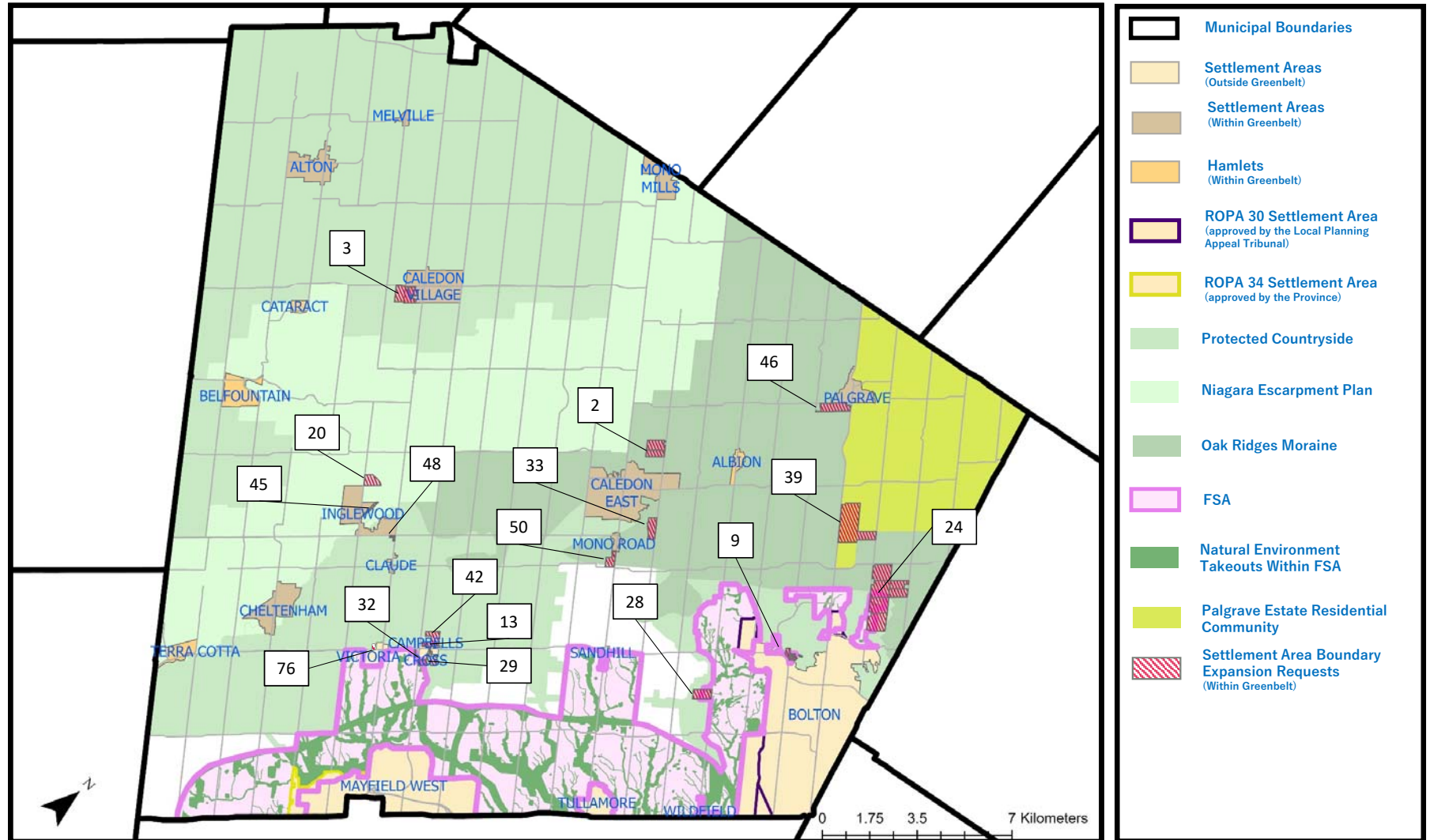
### **B. CALEDON CONTAINS MANY RURAL SETTLEMENTS**

The Town of Caledon is a largely rural landscape, albeit one which is being increasingly shaped by its interface with the rapidly urbanizing parts of the Greater Toronto Area. Thus, while agriculture remains the predominant land use, an increasingly diverse industrial base is developing, including an active aggregate extraction sector. Moreover, while the population of the Town is dispersed throughout the rural area, including a well-established estate residential community and 20 designated settlements, many of them very small, the majority of recent growth has occurred in the Town's two largest settlements—Bolton and Mayfield West. Both are located within the FSA and are planned to be the primary foci for growth to 2051.

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<sup>2</sup> The Greenbelt Area is distinct from the Greenlands System, the Region's term to describe natural environmental areas in Peel, including areas of ecological significance or sensitivity. For more see Region of Peel, *Greenlands System Discussion Paper*, May 2020.

Map 1 – SABE Requests in the Greenbelt Area (GB) of Caledon



## 85. Patrick Pearson

The Region and the Town, through their official plans, establish a hierarchy of settlement for managing growth in the settlements:

- Rural Service Centres are the primary foci for growth. Growth in the centres is planned to occur on full municipal water and wastewater services, in a phased manner, and subject to the financial capabilities of the Region. In addition to Mayfield West and Bolton, the only other Rural Service Centre in the Town is Caledon East. Caledon East's location in the Greenbelt Area, outside the FSA, means that it will experience the least amount of growth of the three Rural Service Centres.<sup>3</sup>
- Villages, which are primarily residential communities built around historic main streets or crossroads. Smaller than Rural Service Centres, the villages provide local goods and services to their residents and the surrounding area as well as limited municipal services and amenities. Water and wastewater services are provided through a combination of municipal, community, and private systems. As such, conditions are generally in place to allow for small scale growth. There are seven villages altogether, and all are located in the Greenbelt Area: Alton, Caledon Village, Cheltenham, Inglewood, Mono Mills, and Palgrave.
- Hamlets, which are small historic residential communities with very limited services. While some hamlets fall within the catchment areas of municipal water and wastewater systems, private well and septic systems still predominate. There are nine hamlets: Albion, Belfountain, Campbell's Cross, Cataract, Claude, Melville, Mono Road, Terra Cotta, and Wildfield. Campbell's Cross and Wildfield are the only hamlets located in or adjacent to the FSA; the remainder lie wholly within the Greenbelt Area. The Region and Town Official Plans envision very little growth in the hamlets.
- Finally, there are three settlements designated as Industrial/Commercial Centres: Victoria, Sandhill, and Tullamore. These are small, mixed-use settlements that provide, at a small scale, a supportive function to Bolton and Mayfield West for industrial and commercial development. All are located in or adjacent to the FSA.

Somewhat outside the settlement framework, the Town is home to a series of unusually large and interconnected estate residential developments in the Greenbelt Area north of Bolton—the Palgrave Estate Residential Community (Palgrave Estates). The community comprises homes on large lots serviced by a municipal water system and private wastewater septic systems. In the Regional context, growth in the Palgrave Estates is slow. However, the growth

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<sup>3</sup> It is noted that as part of Peel 2051 it is proposed that the Rural Service Centres be renamed so as to include them in the Urban System.

rate has been steady for decades and both the Region and Town Official Plans promote continued development of the community over the long-term. There is supply of land in the community to support such growth.

### C. PROVINCIAL PLANNING POLICY DISCOURAGES MAJOR DEVELOPMENT IN RURAL SETTLEMENTS

Land use planning in the Greenbelt Area in Caledon is regulated by a number of complex and overlapping statutes and Provincial and municipal policies and plans. The Region has prepared a number of detailed discussion papers on this policy and regulatory framework as part of its Peel 2051 work. This memorandum focusses on the role settlements in the Greenbelt Area play in accommodating growth and development within that framework.

#### i. *Planning Act* and Provincial Policy Statement 2020 (PPS)

The *Planning Act*, the central piece of legislation in Ontario that governs land use planning, identifies matters of provincial interest that municipal councils must have regard to when making planning decisions. Provincial interests include the appropriate location of development and the promotion of sustainable, transit-supportive development that is oriented to pedestrians and with a built form that is “well-designed, encourages a sense of place, [and] provides for high-quality public spaces”.

The PPS establishes the link between the list of provincial interests and municipal decision making. It provides specific policy direction regarding, among other matters, land use, housing, environmental protection, agricultural lands, economic development and job creation, infrastructure and municipal servicing, and growth management. All planning decisions in Ontario must be consistent with the PPS and municipal official plans are the most important vehicle for implementing its policies.

The PPS requires that the focus of growth and development in Ontario be in “settlement areas” which are built up with development and which exhibit a range of land uses. In the Caledon Greenbelt Area the settlement areas include the Rural Service Centre of Caledon East, as well as the Villages, Hamlets, and Industrial/Commercial Centres described above. The PPS requirement to direct growth and development this way applies in both urban and rural areas. However, in rural areas municipalities must also consider rural characteristics, the scale of development and the provision of appropriate service levels when planning settlement areas. Rural settlement areas must also prioritize intensification, redevelopment, and a compact built form over settlement expansion and, in respect of residential development, must accommodate an appropriate range and mix of housing.



In short, under the PPS growth in rural areas is to be planned to be compact, small-scale, and in keeping with historical patterns.

As part of its direction for developing settlement areas, the PPS includes specific policies that address infrastructure and services. These policies are discussed in more detail below.

### **ii. Provincial Plans and the Growth Plan**

The Province has adopted a body of plans that provide the context within which municipal plans are prepared and implemented. The enabling legislation for these plans, together with the *Planning Act*, requires that all official plans, including the Peel Official Plan, conform to these provincial plans. In assessing rural settlements in Caledon the relevant provincial plans are:

- the Growth Plan, which manages growth in the Greater Golden Horseshoe through, among other things, detailed policies for settlement area boundary expansions and municipal comprehensive reviews. An overarching goal of the Growth Plan is for settlement areas to develop as transit-oriented “complete communities”, where a more compact urban form prevails and people have convenient access to the necessities of daily living. The vast majority of growth and development is to be directed to settlement areas that have existing or planned municipal water and wastewater systems and can support the achievement of complete communities.
- the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan, which collectively manage the Greenbelt Area within the Greater Golden Horseshoe. Unless otherwise prescribed, these plans generally prevail over Growth Plan in the Greenbelt Area of Caledon.<sup>4</sup>

The Growth Plan distinguishes rural settlements from more urban settlement areas. Rural settlements are defined as existing hamlets or similar existing small settlements that are long-established and identified in official plans. They are serviced by individual private on-site water and wastewater systems and contain a limited amount of undeveloped lands that are designated for development. All settlement areas that are defined as hamlets in the Greenbelt Plan, as rural settlements in the Oak Ridges Moraine Conservation Plan, or as minor urban centres in the Niagara Escarpment Plan are considered rural settlements in the Growth Plan. As such, in the Caledon Greenbelt Area all settlement areas are rural settlements, except for Caledon Village, Alton, and parts of Inglewood and Caledon East.

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<sup>4</sup> Detailed conflict provisions are set out in the *Places to Grow Act, 2005*.

The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. Thus, with the exception of Bolton and Mayfield West, all settlement areas in Caledon, whether rural settlements or not, are not promoted as locations for growth and development.<sup>5</sup>

### iii. Greenbelt Plan<sup>6</sup>

The Greenbelt Area in Caledon is broadly divided into three areas: the Oak Ridges Moraine; the Niagara Escarpment; and the Protected Countryside (see Map 1). The Greenbelt Plan regulates the Protected Countryside and permits settlement areas as well as a range of agricultural, environmental, resource and recreational land uses within the Protected Countryside area.

Settlement areas in the Protected Countryside are categorized as:

- Towns/Villages, which are mostly serviced by municipal water and wastewater systems and, as such, are the focus of development and economic and social activity. In Caledon, the Towns/Villages include Caledon Village, Alton, and parts of Inglewood and Caledon East (see Table 1). Inglewood is the only settlement serviced by a municipal wastewater system. A large portion of Inglewood drains to a communal wastewater treatment plant. The rest of the service area drains to the South Peel Lake Based System.
- Hamlets, which are typically serviced by private well and septic systems. Growth in hamlets is discouraged, though limited infill and intensification is permitted subject to appropriate water and wastewater services. Victoria, Campbell's Cross, Claude, Melville, Wildfield, and Mono Mills are the Hamlets identified in the Greenbelt Plan (see Table 1).

Under the Greenbelt Plan, these settlement areas provide a very different role to settlement areas in the fast-growing urban areas of Peel. Their main function is to sustain the Greenbelt, primarily its agricultural areas and its rural lands. When they do grow, they are intended to grow in keeping with their rural and/or existing character. And while they are encouraged to develop into complete communities like more urbanized areas, these settlement areas are not

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<sup>5</sup> It is noted that, under the Growth Plan, rural settlements do not include any designated greenfield areas—lands within settlement areas but outside delineated built-up areas that have been designated in an official plan for development and are required to accommodate the Schedule 3 forecasts.

<sup>6</sup> For more detailed discussion see Region of Peel, *Greenbelt Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.

intended to play a major role in accommodating the growth targets prescribed by Schedule 3 to the Growth Plan.

Settlement areas located outside the Greenbelt are prohibited from expanding into the Greenbelt (Policy 3.4.2.1). As such, Bolton and other settlement areas adjoining the Greenbelt can only expand into lands covered by the FSA. The suitability of such expansion is addressed through the Region's Settlement Area Boundary Expansion technical studies.

The Growth Plan does afford opportunities for expanding settlement areas in the Protected Countryside, but only in the context of a municipal comprehensive review.<sup>7</sup> By insisting on a comprehensive approach, the Growth Plan requires that decisions about settlement boundary expansions be made with reference to growth on a regional scale rather than within any one settlement area or specific site. Moreover, when considering a settlement area boundary expansion a very prescriptive and limiting set of criteria must be applied:

- the settlement area must be identified in the Greenbelt Plan as a Town/Village;
- the proposed expansion must be modest in size, representing no more than a 5 per cent increase in the geographic size of the settlement area based on the settlement area boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area;
- the proposed expansion would support the achievement of complete communities or the local agricultural economy;
- the proposed uses cannot be reasonably accommodated within the existing settlement area boundary;
- the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing settlement area; and
- expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.

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<sup>7</sup> Minor adjustments ("rounding out") to boundaries outside of a municipal comprehensive review are permitted for rural settlements that are located outside the Greenbelt Area.

In short, settlement area boundary expansions in the Protected Countryside are only permitted on a small scale and only if there is specific and concrete evidence that there is insufficient capacity within the settlement area to accommodate the projected growth.

### **iv. Oak Ridges Moraine Conservation Plan (ORMCP)<sup>8</sup>**

The Oak Ridges Moraine Conservation Plan regulates land use within the Oak Ridges Moraine, which covers a substantial part of Caledon's Greenbelt Area. The plan identifies four land use designations within the Moraine: Natural Core Areas, Natural Linkage Areas, Countryside Areas, and Settlement Areas.

Two types of settlement are identified in the ORMCP:

- Settlement Areas, which are intended to focus and contain urban growth and develop as complete communities “permitting a range of residential, commercial, industrial and institutional uses” (Policy 10 (1) 3). Minimizing the encroachment and impact of development in the settlement area on the ecological functions and hydrological features of the Moraine are a priority. Recent amendments to the ORMCP expand the vision for Settlement Areas so that they are encouraged to be accessible by sustainable modes of travel and provide a mix of employment, services, and housing. The development of community hubs and co-location of public services is promoted as is the maintenance and construction of infrastructure to support growth and development (this mirrors similar policies for rural settlements in the Growth Plan). The only settlement area in the ORMCP in Caledon is a portion of Caledon East (see Table 1).
- Smaller Rural Settlements, located within the Countryside Area. In Caledon, the rural settlements are Albion, Mono Road, and Palgrave (see Table 1). They are described as “existing hamlets or similar existing small communities” under ORMCP Policy 10 (1) 4.

The ORMCP permits the expansion of Settlement Areas but does not explicitly authorize Rural Settlement expansion. It defers to the Growth Plan for Settlement Area boundary expansions but prohibits any expansion of Settlement Areas into Natural Core Areas and Natural Linkage Areas. Under the Growth Plan, expansion in the Oak Ridges Moraine must be undertaken as part of a municipal comprehensive review (see above).

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<sup>8</sup> For more detailed discussion see Region of Peel, *Oak Ridges Moraine Conservation Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.

In addition, the ORMCP prohibits the construction or expansion of partial water and wastewater services in the Moraine. The exception to this policy is in the Palgrave Estates, where ongoing residential development is permitted.

### **v. Niagara Escarpment Plan (NEP)<sup>9</sup>**

The Niagara Escarpment, a UNESCO World Biosphere Reserve, covers a significant portion of Caledon's Greenbelt Area. Like the Protected Countryside and Oak Ridges Moraine, the area includes a diverse range of environmental, agricultural, resource, residential, and recreational land uses. However, the sensitivity of ecological and hydrological features and systems in the Escarpment mean that significant environmental protection is warranted. As such, urban development within the NEP Area is generally discouraged.

The NEP designates Minor Urban Centres throughout the Escarpment to recognize existing rural settlements, villages, and hamlets. In Caledon, the Minor Urban Centres include Mono Mills, Cataract, Belfountain, Inglewood, Cheltenham, and Terra Cotta (see Table 1). These settlements are permitted to accommodate growth and development within their existing boundaries provided it does not conflict with existing community character and can be achieved in an environmentally sustainable manner. The range of permitted uses and creation of new lots are to be regulated by municipal official plans.

Settlement boundary expansions require an amendment to the NEP, even if the boundary adjustment does not result in a net gain of the Minor Urban Centre area. Indeed the only boundary adjustment permitted without an NEP amendment is one that would *reduce* the settlement boundary area within the current boundary area. The NEP is updated every 10 years and the last update was in 2017. This policy framework effectively prevents any expansion of the Minor Urban Centres through the Peel 2051 process.

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<sup>9</sup> For more detailed discussion see Region of Peel, *Niagara Escarpment Plan (2017)*, *Peel 2041 Discussion Paper*, November 2019.



**Table 1 – Caledon Settlement Designations in Greenbelt Plans and Municipal Plans**

Settlement	Greenbelt Plans			Official Plans	
	Protected Countryside	Oak Ridges Moraine	Niagara Escarpment	Region	Town
<b>Victoria</b>	Hamlet (part)			Rural Settlement	Ind./Commercial Centre
<b>Campbell's Cross</b>	Hamlet (part)			Rural Settlement	Hamlet
<b>Claude</b>	Hamlet			Rural Settlement	Hamlet
<b>Melville</b>	Hamlet			Rural Settlement	Hamlet
<b>Mono Mills</b>	Hamlet		Minor Urban Centre	Rural Settlement	Village
<b>Inglewood</b>	Town/Village (part)		Minor Urban Centre (part)	Rural Settlement	Village
<b>Caledon Village</b>	Town/Village			Rural Settlement	Village
<b>Alton</b>	Town/Village			Rural Settlement	Village
<b>Caledon East</b>	Town/Village (part)	Settlement Area (part)		Rural Service Centre	Rural Service Centre
<b>Mono Road</b>		Rural Settlement		Rural Settlement	Hamlet
<b>Albion</b>		Rural Settlement		Rural Settlement	Hamlet
<b>Palgrave</b>		Rural Settlement		Rural Settlement	Village
<b>Cheltenham</b>			Minor Urban Centre	Rural Settlement	Village
<b>Belfountain</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Cataract</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Terra Cotta</b>			Minor Urban Centre	Rural Settlement	Hamlet
<b>Wildfield</b>	Hamlet Area			Rural Settlement	Hamlet
<b>Sandhill</b>	Not in Greenbelt Area			Rural Settlement	Ind./Commercial Centre
<b>Tullamore</b>	Not in Greenbelt Area			Rural Settlement	Ind./Commercial Centre

## D. GROWTH IN RURAL SETTLEMENTS ANTICIPATED TO REFLECT HISTORICAL TRENDS

Preliminary growth forecasts undertaken for the Region in 2019 assumed that the Caledon SAGE would need to accommodate additional population of 51,500 and additional employment of 20,400 by 2041. The size of the FSA is approximately 8,000 hectares, about six times larger than the total estimated land need required to accommodate these forecasts.

Changes to Schedule 3 of the Growth Plan, including an extension of the time horizon for Regional land use planning to 2051, have significantly increased the population and employment forecast for the Region overall and, in turn, the SAGE. Current, though preliminary forecasts now require a SAGE large enough to accommodate 183,000 people and 67,700 jobs by 2051. As a result, the majority of the FSA will need to be urbanized in order to accommodate the additional growth.

For people wishing to live in a rural landscape but within a relatively close commuting distance to jobs in Brampton, Mississauga, and other parts of the GTA, Caledon's rural settlements remain desirable places to live. Indeed, it may be expected that commuting times will improve to and from the Greenbelt Area with the construction of the GTA West highway and the urbanization of much of the FSA over the 2051 time horizon. It is therefore perhaps no surprise that several requests to expand settlements in the Greenbelt Area have been received in recent years.

Table 2 below illustrates the pattern of growth in the rural settlements between 2006 and 2016. The table shows that population growth between 2011 and 2016 was four times higher than between 2006 and 2011 and housing growth doubled over the same time period. However, about 70% of all housing growth occurred in Caledon East, the larger Rural Service Centre that contains the Town's administration offices and which, under the Regional and Town Official Plans, is intended to be the focus of most growth and development in the Greenbelt Area.

Outside Caledon East, growth was much slower—about 25 housing units per year over the 10 years, slowing to about 17 units per year between 2011 and 2016.

## 85. Patrick Pearson

Table 2 - Historical Growth in Rural Settlements 2006-2016										
	2006		2011		2016		Growth 06-11		Growth 11-16	
	Pop.	Units	Pop.	Units	Pop.	Units	Pop.	Units	Pop.	Units
Palgrave	2,575	800	2,728	901	2,888	974	153	101	160	73
Sandhill	1,493	474	1,520	479	1,487	456	27	6	(33)	(24)
Cheltenham	402	150	414	154	419	152	12	4	5	(2)
Terra Cotta	767	285	796	291	803	300	29	6	7	9
Victoria	761	235	826	252	765	233	65	17	(61)	(19)
Campbells Cross	308	105	286	97	393	114	(22)	(8)	107	17
Caledon East	3,462	1,129	3,729	1,235	5,309	1,715	267	106	1,581	480
Caledon Village	1,576	490	1,576	500	1,499	491	0	10	(77)	(9)
Alton	1,121	385	1,023	360	1,085	396	(98)	(25)	62	36
Melville	545	175	489	166	531	182	(56)	(9)	42	16
Mono Mills	1,238	405	1,138	409	1,090	392	(100)	4	(48)	(17)
Inglewood	1,079	360	1,203	430	1,180	426	124	70	(23)	(4)
Belfountain	525	190	511	187	525	188	(14)	(3)	14	1
Mono Road	426	143	427	140	436	143	1	(3)	9	3
Claude	402	150	414	154	419	152	12	4	5	(2)
Albion	274	95	270	93	277	94	(4)	(3)	7	2
<b>Total</b>	<b>16,953</b>	<b>5,570</b>	<b>17,349</b>	<b>5,847</b>	<b>19,106</b>	<b>6,407</b>	<b>396</b>	<b>277</b>	<b>1,757</b>	<b>560</b>
<b>Less Caledon East</b>	<b>13,491</b>	<b>4,441</b>	<b>13,620</b>	<b>4,612</b>	<b>13,797</b>	<b>4,692</b>	<b>129</b>	<b>171</b>	<b>177</b>	<b>80</b>

Source: Statistics Canada, Census of Canada 2006, 2011, 2016

Note: Results adjusted to account for dissemination boundary changes.

### i. Growth Management Policy Review

A key focus area of the Peel 2051 process is Growth Management which assesses the potential of various areas of the Region to accommodate the Schedule 3 forecasts. Among the key policy directions of the Growth Management work to date are:

- That the Regional Urban Boundary 2031 reflects the policy intent to guide the majority of growth within the Urban System. In Peel, the Urban System includes only the Cities of Mississauga and Brampton.
- That the Regional Urban Boundary should be updated to include the Rural Service Centres of Mayfield West, Bolton, and Caledon East.
- That the Rural Service Centre policies be moved from the Rural System to the Urban System to reflect their new status as settlement areas, delineated built-up areas, and designated greenfield areas where growth should be directed under the Growth Plan.
- That the remaining lands in Caledon, including the Palgrave Estates, be designated as Rural System and that rural settlements, including Villages, Hamlets and Industrial/Commercial Centres designated in the Caledon Official Plan, be identified in Schedule D of the Regional Official Plan.

## ii. Growth Management Forecasts

Forecasts prepared as part of the Growth Management work assume that housing growth in Caledon East, the rural settlements, the Palgrave Estates, and the remaining rural areas of the Greenbelt Area will continue at historical rates. This is in keeping with the pattern of growth set out in Table 2, recent building permit data, and the expectations of the Region and Town through their official plans and master servicing plans. With the exception of the Palgrave Estates, all settlements are assumed to build out their existing supply of land by 2051. This effectively means that the land needs assessment undertaken for the Region assumes there is no need for additional urban land to accommodate 2051 growth.

This assumption accounts for a large subdivision, about 1,000 units, approved for development in Caledon East which is anticipated to be constructed within the first half of the 2051 time horizon.

Table 3 below summarizes the housing growth assumptions used in the Regional growth forecasts for the lands in the Greenbelt Area. All housing is assumed to take the form of single detached units. This assumption should be tempered by a robust planning policy framework which encourages more higher density built forms in the rural settlements over time. If realized, this would reduce the land needed to accommodate the forecast housing growth.

Table 3 – Forecast Housing Growth in Region of Peel Greenbelt Area 2021-2051			
	2021 Housing Supply Estimate	2021-2051 Forecast Unit Growth	Average Units Per Year 2021-2051
Rural Settlements (less Caledon East)	510	510	17
Caledon East	1,100	1,100	37
Palgrave Estates	1,000	1,000	33
Greenbelt Other	150	150	5

Source: Hemson Consulting

## E. KEY INFRASTRUCTURE AND SERVICES ARE ALREADY IN PLACE

A key factor in evaluating when assessing the development potential of the rural settlement areas is their ability to provide water and wastewater services, as well as other infrastructure and public service facilities and amenities required to sustain a complete community.

### i. Water and Wastewater

The PPS outlines a servicing hierarchy for planning water and wastewater services. The preferred form of servicing settlement areas is systems owned and operated by municipalities. Where municipal systems exist in settlement areas, intensification and redevelopment must be prioritized in order to optimize their use.

Where municipal systems are not available or feasible, private communal services are preferred for multi unit/lot development. Least preferred in the servicing hierarchy are individual on-site services—private wells and septic systems—that are owned, operated, and managed by individual landowners, as well as partial services. These systems are permitted only when site conditions are suitable and there are no resulting negative impacts to natural heritage features and water systems. In settlement areas, their use is restricted to accommodating infill and minor rounding out of existing development.

Overall, the PPS promotes development in settlement areas on municipal services. Within this framework, excess capacity within existing systems is given priority in order to promote the efficient use of infrastructure. The Growth Plan reinforces the PPS by directing that growth be limited in settlement areas not serviced by existing or planned water and wastewater systems.

The Growth Plan also contains a number of policies that require settlement area boundary expansions to address infrastructure capacity and, in doing so, supports the PPS servicing hierarchy. Specifically, the feasibility and most appropriate location for expansion must account for whether there is sufficient capacity in existing and planned infrastructure to accommodate the forecast growth and whether:

- the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate; and
- the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water.



## 85. Patrick Pearson

In June 2020, Regional staff released a report on municipal groundwater systems in Caledon's Greenbelt Area.<sup>10</sup> Highlights of the report include:

- The Greenbelt Area is well serviced by four municipal water systems. Of the settlements identified in Table 1 above, only two—Belfountain and Cataract—are not serviced by a municipal water system and are dependent on individual private wells.
- There are only two municipal wastewater systems in the Greenbelt Area—in Caledon East and part of Inglewood.
- While the Region has received requests to allow communal servicing in the Greenbelt Area the report noted that “this does not align with the Region’s existing or planned policy direction which could potentially expose municipalities to significant financial, public health and safety risks over the lifetime of the services.”
- Capital investment is required in some systems to mitigate the risk of system redundancy and maintain infrastructure in a state of good repair. It is noted that in making decisions about settlement area boundary expansions, the Growth Plan requires that the Region consider whether the infrastructure needed would be financially viable over the full life cycle of these assets.
- Current and projected growth—based on projections that are slightly lower than those set out in Table 3—can generally be serviced by existing municipal water systems. That said,
  - Growth in Caledon East, coupled with efficiency decline, requires construction of a new well in Caledon East and capacity increase in Palgrave in order to meet long-term needs in the Caledon East-Palgrave System.
  - No additional works are required in the near future to accommodate growth-related needs in the Alton-Caledon Village and Cheltenham-Terra Cotta Systems.
  - The Inglewood system is operating very close to capacity and will require interconnection to adjacent systems to accommodate growth.

Despite this report, the Region’s long-term capital forecasts (to 2041) do not currently contemplate any growth-related expansion to the municipal water and wastewater systems in the Greenbelt Area.

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<sup>10</sup> *Servicing Update of Groundwater-Based Drinking Water Systems*, Region of Peel Staff Report, 25 June 2020.

### ii. Public Services Facilities

The Growth Plan encourages municipalities to plan for a variety of cultural and economic opportunities within rural settlements to serve the needs of rural residents and area businesses. It also requires that in determining the feasibility and most appropriate location for settlement boundary expansions the Region consider that the public service facilities needed would be financially viable over the full life cycle of these assets. Public service facilities in rural settlements are encouraged to be co-located and integrated in community hubs, with priority given to maintaining and adapting existing facilities where feasible.

Although focussed on the FSA, the SABE Public Facilities Technical Study provides detailed information on public service facilities that might be required for rural settlements.<sup>11</sup> It notes that:

- The Greenbelt Area is reasonably well serviced with libraries and indoor recreation facilities. The Town offers recreation and leisure programming and services at the Caledon Community Complex, in Caledon East, and the Victoria Parks Community Centre, in the rural area at the Town's northern boundary. The former includes two indoor rink facilities. Caledon Public Library operates branches in Belfountain, Caledon East, Caledon Village, Inglewood, and in the rural area (the Alton branch). Initial planning is underway to relocate the Caledon East library branch to the Caledon Community Complex.
- While travel times to these facilities are longer than in the more urbanized areas to the south the distribution of the branches, coupled with their total floor area, likely mean that service levels provided to residents in the Greenbelt Area are not too dissimilar to those provided to the south of Caledon.
- In 2019, a "divisional model" for co-ordinating fire and paramedic services in Caledon was adopted by the Town. Fire station expansions planned for Caledon Village, Palgrave, Mono Mills, and Alton, over the next decade will be required to achieve NFPA Fire Response Standards in the Greenbelt Area. No similar facility expansion for paramedic services is contemplated in the Greenbelt Area over the same time period.
- School enrollment as a percentage of capacity varies considerably within the Greenbelt Area, anywhere from 50% to 119%, which is evidence of school coverage that is somewhat disconnected to school needs.

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<sup>11</sup> *Region of Peel Public Facilities Technical Study*, Monteith Brown and Hemson Consulting, June 2020.

## F. FORMAL REQUESTS FOR EXPANSION HAVE BEEN RECEIVED

The Region has received several formal requests to expand rural settlements and settlement areas in the Greenbelt Area. Table 4 summarizes these requests in light of the Provincial policy framework and municipal planning principles and infrastructure/servicing conditions discussed above. Map references shown in the table can be cross-referenced with Map 1.

This memorandum was released on the region's Settlement Area Boundary Expansion Study webpage on December 10, 2020. On February 9, 2020 the Region consulted with landowners who had made rural settlement boundary expansion requests on the memorandum findings. Follow up meetings were subsequently held with individual landowners upon request.

## G. CONCLUSIONS AND RECOMMENDATIONS

Based on the above consultation and analysis the following conclusions can be made:

- The Provincial planning policy framework requires that expansions to settlement boundaries in the Greenbelt Area be done through a municipal comprehensive review. The Growth Plan specifically requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area.
- While significant growth is planned for Caledon over the next 30 years to 2051—220,000 persons and 98,000 jobs—the most appropriate location for development associated with that growth is as intensification within existing settlement areas and in the SABE area(s) to be located within the FSA.
- Through numerous technical studies as part of the SABE work, it has been determined that the most appropriate location for settlement boundary expansion in Caledon to accommodate housing is in the form of a logical and contiguous expansion of Bolton and Mayfield West.
- There exists, within the Greenbelt Area, a network of settlements, including a large Rural Service Centre in Caledon East and several villages and hamlets, as well as an extensive estate residential community, where small-scale growth has occurred in recent years and is planned for under the current official plans and in the Peel 2051 growth forecasts, consistent with the Provincial policy framework.
- Under the Growth Plan, the main function of settlements located in the Protected Countryside is to support agricultural areas and rural lands in the Greenbelt. They are not intended to play a major role in accommodating growth and development.

## 85. Patrick Pearson

- It is assumed that growth in these areas will continue at the same, or slightly faster rate than in recent decades, in keeping with the longstanding pattern, the scope of services available in these settlements, and the limited ability to develop “complete communities” as defined by the Growth Plan.
- Settlements in the Greenbelt Area will collectively continue to provide a suitable range and mix of housing forms and lifestyle options to residents, from estate residential homes in the Palgrave Estates and elsewhere, to traditional subdivisions, to denser housing in infill lots and as intensification. The Region should promote increasing the range and mix of housing to allow existing residents to “age in place” in these communities.
- Generally, there is sufficient supply of lots in existing village and hamlet settlements to accommodate the forecast demand for housing over the long-term without the need to expand settlement area boundaries.
  - The exception may be Caledon East, which has a ready supply of developable land but has demonstrated high growth in recent years and has approved a 1,000 unit subdivision with units under construction. The Region should consider whether the current Caledon East settlement area boundary is sufficient to meet market demand and the settlement’s emerging status as a settlement area in the Regional Urban System.

### **i. Requests for Settlement Boundary Expansion in Greenbelt Area**

- The Provincial Greenbelt Plans restrict the Region from approving many of the requests for settlement area boundary expansion set out in Table 4:
  - Without an amendment to the Niagara Escarpment Plan, the expansion of settlement areas in the Niagara Escarpment Plan area is prohibited (see Requests 20 and 45).
  - The expansion of settlement areas into Natural Linkage Areas and Natural Core Areas of the ORMCP Area is prohibited under the ORMCP (see Requests 24, 46, 33, and 50).
  - The expansion of a settlement into the Greenbelt Area from a settlement located outside the Greenbelt Area is prohibited (see Request 9).
  - The expansion of designated Hamlets into the Protected Countryside is prohibited (see Requests 13, 29, 42, and 76).
  - The expansion of a designated Town/Village into the Protected Countryside must conform to Growth Plan Policy 2.2.8.3 k) (see Requests 3, 2, 46, and 48).

## 85. Patrick Pearson

- Requests for settlement boundary expansion from existing settlement areas into the FSA should be addressed through the Peel 2051 SABE process (see Requests 32, 24, 9, and 28).
- It is recommended that the Regional Official Plan continue to designate the Palgrave Estate Residential Community based on the current approved boundary in the Region of Peel and Town of Caledon Official Plans (see Request 39).

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Overall, the analysis demonstrates that rural settlements should play a limited role in accommodating population and employment growth in Caledon to 2051. The Growth Plan requires that growth be limited in rural settlements and in settlement areas that are in the Greenbelt Area. The land needs assessment undertaken under Growth Policy 2.2.1.5, together with the SABE technical studies, demonstrate that there are sufficient opportunities to accommodate the growth forecast for the Region through intensification, in existing designated greenfield areas, and in the Caledon SABE area located within the FSA.

As such, with the exception of Request 48, there is little justification for expanding settlement area boundaries in the Greenbelt Area at this time.



Table 4 – Summary of SABE Requests in Greenbelt Area

Map 1 Reference <sup>1</sup>	Settlement Area	Applicable Plan	Comments	Recommendation
2  16494 Innis Lake Road	Caledon East	Oak Ridges Moraine Conservation Plan (Countryside Area)	<p>Request to consider expansion of Caledon East to accommodate a 38 hectare property (two land parcels) at 16494 Innis Lake Road and to resolve an outstanding LPAT appeal. Property is located in the Countryside Area of the ORMCP Area. Property is not attached to current settlement area boundary but is separated from Caledon East by the 62 hectare George Crescent estate residential subdivision. Owner proposes that this subdivision also be included in the proposed expansion to reflect existing settlement pattern. As such, the total area of the proposed expansion is 100 hectares.</p> <p>Proposal exceeds the maximum permissible expansion under Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. It is also noted that the George Crescent estate residential subdivision predates the establishment of the Greenbelt Area.</p>	Deny request

<sup>1</sup> Map 1 only shows requests within the Greenbelt Area. For SABE requests outside the Greenbelt Area please refer to Hemson Consulting, *Settlement Area Boundary Expansion Study: Final Concept Map and Fiscal Impact Analysis*, September 2, 2021.

## 85. Patrick Pearson

3  O and 2785 Charleston Sideroad	Caledon Village	Greenbelt Plan (Protected Countryside)	<p>Request to expand Caledon Village to accommodate 12 hectares of land for residential uses on Charleston Sideroad. Land contains a disused gravel pit with an active extraction license and abuts 24 hectares of land under same ownership and already designated for residential uses in the settlement area. A rehabilitation plan for the entire site (44 hectares, including 8 hectares which are proposed to remain in the Greenbelt) is required under the <i>Aggregate Resources Act</i> (AIA). Owner proposes a plan of subdivision in lieu of a rehabilitation plan, with subdivision containing 25 estate residential lots within expansion area, together with a stormwater pond, public park, and local roads. The lots comprise ~50% of the expansion area; Caledon Village settlement area is ~257 hectares.</p> <p>Proposal exceeds the maximum permissible expansion under Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. Additional study also required to determine whether proposed uses support achievement of a complete community, including providing a suitable range and mix of housing options, and cannot reasonably be accommodated within the existing settlement area.</p> <p>As well, proposed settlement expansion is adjacent to a property that has an active aggregate licence. Justification demonstrating that the proposed expansion would not preclude or hinder the continued use of the mineral aggregate operation and that expansion would not be</p>	Given the technical work required to assess appropriate rehabilitation of the site, request should be considered premature.
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## 85. Patrick Pearson

			incompatible for reasons of public health, public safety or environmental impact is required.	
9  Multiple addresses	Bolton	Greenbelt Plan (Protected Countryside)	<p>Request to expand Bolton settlement area into Protected Countryside of Greenbelt Area. Lands comprise 14 hectares along Chickadee Lane, King Street, and Glasgow Road, of which 4.7 hectares lies within Greenbelt Area and remainder lies within FSA.</p> <p>Requires expansion into the Greenbelt Area from a settlement located outside the Greenbelt, which is prohibited under Policy 3.4.2.1 of the Greenbelt Plan. Area within FSA has been studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). Adjoining lands in FSA under same ownership were recently approved for inclusion in Bolton settlement area by LPAT Order dated 10 November, 2020.</p>	<p>Deny request for lands within the Greenbelt Area.</p> <p>For lands within the FSA, request has been resolved by LPAT Order dated 10 November, 2020.</p>
13  3540 and 3264 King Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request to expand Campbell's Cross to accommodate ~28 acres of land south of King Street to construct 18 homes. Lands are located within the Protected Countryside, east of Kennedy Road, south of King Street, and west of the Herb Campbell Public School. Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request
20  15983 – 16069	Inglewood	Niagara Escarpment Plan	Request to "round out" Inglewood Settlement Area to accommodate ~10 residential lots and parkland at 15983 McLaughlin Road (adjoining parcels at 15999 and 16069 McLaughlin Road are under same ownership but do not form part of the request). Requires amendment to the NEP, and Region is not contemplating requesting such an	Deny request

## 85. Patrick Pearson

McLaughlin Road			amendment at this time. Inglewood already contains about 4 ha of gross vacant land for development. As well, Inglewood municipal water system has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system.	
24  Multiple addresses	Bolton	Oak Ridges Moraine Conservation Plan (Natural Linkage Area) AND Greenbelt Plan (Protected Countryside)	Request to consider 5 parcels of land that are partially within the FSA north-west of Bolton, within the east Bolton “finger”, and extend into Natural Linkage Area of the Oak Ridges Moraine Conservation Area as well as Protected Countryside under the Greenbelt Plan. Total land area is 162.6 hectares. Area within FSA has been extensively studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). ORMCP prohibits settlement area expansion into Natural Linkage Areas. Greenbelt Plan Policy 3.4.2.1 prohibits expansion into the Greenbelt Area from a settlement located outside the Greenbelt.	Deny request for lands within the Greenbelt Area.  For lands within the FSA, request should be addressed through Peel 2051 SABE process.
28  13464 The Gore Road	Bolton	Greenbelt Plan (Protected Countryside)	Request to consider expansion of the Bolton settlement area to include of 24 hectares of land west of Bolton at 13464 The Gore Road. Land parcel is split between the FSA (12.8 hectares) and the Protected Countryside in the Greenbelt Area (11.1 hectares).	Request in respect of lands within Greenbelt Area withdrawn by landowner.
29  13945 Kennedy Road	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request expand Campbell's Cross to include 5.8 hectare land parcel at 13945 Kennedy Road. Parcel is split between FSA (3.4 hectares) and Protected Countryside in the Greenbelt Area (2.4 hectares). Proposal is to construct lots for rural residential single family homes except on Greenbelt Area lands. Area within FSA has been extensively studied	Deny request for lands within the Greenbelt Area.

## 85. Patrick Pearson

			through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made). Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	For lands within the FSA, request should be addressed through Peel 2051 SABE process.
32 8 Victoria Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request that part of a property at 8 Victoria Street (0.1 hectares), currently zoned for agricultural uses, be brought into Campbell's Cross. Expansion area falls within the FSA and been extensively studied through the technical studies prepared as part of the Peel 2051 SABE process (to which reference should be made).	Request should be addressed through Peel 2051 SABE process.
33 15430 Innis Lake Road	Caledon East	Oak Ridges Moraine Conservation Plan (Natural Core Area)	Request to expand Caledon East to accommodate a property at 15430 Innis Lake Road. Property is not attached to Caledon East and is located within a Natural Core Area of the ORMCP area. The ORMCP prohibits settlement area expansion into Natural Core Areas.	Deny request
39 15731 Highway 50	n/a (Palgrave Estate Residential Community)	Oak Ridges Moraine Conservation Plan (Countryside Area)	Request to expand the Palgrave Estates boundary within the ORMCP to incorporate a portion of the Glen Eagle Golf Club. Land parcel is 118 hectares, of which expansion portion is 21 hectares.  Section 14.1 of the ORMCP permits residential development in the Palgrave Estates "subject to the Town of Caledon Official Plan". The subject land is currently designated Countryside Area in the Regional and Town Official Plans and mapping. The current Palgrave Estates	Deny request on the basis that the Region and Town are implementing the long-established boundaries of an approved Palgrave



## 85. Patrick Pearson

			boundary was established based on the existing Town Palgrave Estates designation as adopted by Caledon Council, identified in the Regional Official Plan, and approved by the Province. Major development in the Countryside Area (the creation of four or more lots) is not permitted under the ORMCP.	Estate Residential Community that is consistent with the ORMCP.
42  3634 King Street	Campbell's Cross	Greenbelt Plan (Protected Countryside)	Request to expand Campbell's Cross Settlement Area to accommodate 24.3 hectares of land north of King Street. Land are located within the Protected Countryside. Campbell's Cross is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request
45  0 and 15707 McLaughlin Road	Inglewood	Niagara Escarpment Plan	Request to include 3.31 hectares of land at "0" McLaughlin Road, plus smaller adjoining land parcels owned by the Town (a stormwater management pond) and Region (a water pumping station) in the Inglewood settlement area. Requires amendment to the NEP, and Region is not contemplating requesting such an amendment at this time. Inglewood already contains about 4 ha of gross vacant land for development. As well, Inglewood municipal water system has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system.	Deny request
46  8575 Patterson Sideroad	Palgrave	Oak Ridges Moraine Conservation Plan (Countryside Area and	Request to expand Palgrave to the south to accommodate ~16 hectares of a 32.4 hectare site between Highway 50 and Duffy's Lane. Although the land has a house and some ancillary buildings, agricultural uses and natural heritage features predominate. Landowner states that the land	Deny request

## 85. Patrick Pearson

		<p>Natural Core Area)</p> <p>is not suited for agricultural uses because of a prior mineral aggregate operation; as such, residential uses are proposed.</p> <p>The entire site is roughly divided evenly between Countryside Area and Natural Core Area under the ORMCP. Expansion into the Natural Core Area part is prohibited. Only that portion of the site that falls within the Countryside Area forms part of the request. Palgrave is designated as a Rural Settlement (<i>not</i> a Settlement Area) in the ORMCP and the Regional Official Plan, and as a Village in the Caledon Official Plan. While the ORMCP permits the expansion of Settlement Areas it does not explicitly authorize Rural Settlement expansion. As such, approval of an expansion to Palgrave would be contingent on the Province amending the ORMCP legislation to permit the expansion.</p> <p>Notwithstanding the above legislative amendment, the proposal would have to conform to Growth Plan policy 2.2.8.3 k) ii, which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. The Palgrave Rural Settlement, outside the Palgrave Estate Residential Community, is ~75 hectares in size; the lands in question are ~16 hectares.</p> <p>Moreover, Growth Plan policy 2.2.8.3 k) ii, requires that the proposal support the achievement of complete communities and not reasonably be able to be accommodated in the existing Palgrave settlement area. As well, the proposed development must be serviced by existing</p>	
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## 85. Patrick Pearson

			<p>municipal water and wastewater without impacting future intensification opportunities in Palgrave. In this respect, Regional staff have stated that growth in the Caledon East-Palgrave water system, coupled with efficiency decline, requires a new well in Caledon East and capacity increase in Palgrave in order to meet long-term needs.</p>	
<p>48</p> <p>15344 Hurontario Street</p>	Inglewood	<p>Greenbelt Plan (Protected Countryside)</p>	<p>Request to expand part of the Inglewood Village Settlement Area that is located in the Protected Countryside to accommodate 2 hectares of land, including a 0.35 hectare site, at the intersection of Old Base Line Road and Hurontario. The lands are mostly urban, as they contain a cluster of commercial and residential uses.</p> <p>Proposal meets test of Growth Plan policy 2.2.8.3 k) ii., which states that proposed expansion must represent “no more than a 5 per cent increase in the geographic size of the settlement area...up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area”. Proposal is modest in size and full development of the lands for residential and non-residential uses would contribute to a complete community.</p> <p>Additional analysis required to confirm a) that proposed uses cannot be reasonably accommodated within the existing Village, as Inglewood already contains about 4 ha of gross vacant land for development and b) that proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing Village (Inglewood municipal water system</p>	<p>Consider approving request subject to additional analysis (see left).</p>

## 85. Patrick Pearson

			has little capacity to accommodate growth and community is only partially serviced by municipal wastewater system).	
50  15070 Airport Road	Mono Road	Oak Ridges Moraine Conservation Plan (Natural Linkage Area)	<p>Request to expand Mono Road to accommodate a 15 hectare site at 15070 Airport Road which is currently occupied by a horticultural nursery (Glen Echo Nursery). Site is separated from the settlement area by a smaller property which also forms part of the expansion request. Landowner proposes a mix of uses on the site “to fully realize its development potential”.</p> <p>Mono Road is designated as a Rural Settlement in the ORMCP and the Regional Official Plan, and as a Hamlet in the Caledon Official Plan. Landowner has confirmed that site is located within a Natural Linkage Area of the ORMCP area. ORMCP prohibits settlement area expansion into Natural Linkage Areas.</p>	Deny request
76  Part lot 28 Con 1 WHS, King Street West	Victoria	Greenbelt Plan (Protected Countryside)	Request to expand Victoria Settlement Area to accommodate a land parcel north of King Street. Parcel is located within the Protected Countryside. Victoria is designated as a Hamlet under the Greenbelt Plan and as such cannot be expanded into the Protected Countryside.	Deny request

November 29<sup>th</sup>, 2023

GSAI File: 1594-001

Planning & Development  
Community Services  
6311 Old Church Road  
Caledon, Ontario  
L7C 1J6

**Attention: Bailey Loverock,  
Team Lead, Official Plan Review**

Re: Future Caledon Official Plan Review  
New Urban Area 2051  
13945 Kennedy Road  
King On Kennedy 15 Holding Inc.

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Glen Schnarr & Associates Inc. are the planning consultants for King On Kennedy 15 Holding Inc., the Owner of the property municipally addressed as 13945 Kennedy Road (the ‘Subject Lands’). The Subject Lands are located east of Kennedy Road, south of King Street, and immediately south of the Campbell’s Cross Settlement Area. The Subject Lands have an approximate frontage of 165 metres along Kennedy Road and have a site area of approximately 5.77 hectares (14.26 acres). Please accept the following comments as a formal response to the Official Plan Review process.

On behalf of the Owner, GSAI supports the current draft Official Plan mapping, which includes a portion of the Subject Lands within the 2051 Urban Area.

Per Schedule B2 (Growth Management) and Schedule E9 (Claude, Victoria, and Campbell’s Cross) of the August 2023 Draft Future Caledon Official Plan, the Subject Lands are identified within the expanded “Urban Area”. Per Schedule F1 (Urban System), the Subject Lands are further identified within the “New Community Area”. Please refer to the Concept Figure, prepared by GSAI, included as Appendix I to this letter, for reference.

It is the intention of the Owner to redevelop the Subject Lands with residential uses, consistent with the permissions of the Urban Area and New Community Area designations.



We also recognize that the Region of Peel identifies the Subject Lands as “Campbell’s Cross Transition Area” within Schedule E-4 (Employment Uses). The intention of the Transition Area is to *“provide a transition from employment uses to the Campbell’s Cross settlement area, which is primarily residential”*. Any future development on the site will ensure there is an appropriate transition from the adjacent employment uses, consistent with the intent of the Region of Peel Official Plan.

We look forward to further conversations with staff through this process and reiterate our support for permitted residential uses on the Subject Lands through a compatible designation, including the prospective New Community Area designation.

Thank you for receiving our comments. Should you have any questions, please contact the undersigned at 416-648-2111 or [patrickp@gsai.ca](mailto:patrickp@gsai.ca).

Sincerely,

**GLEN SCHNARR & ASSOCIATES INC.**

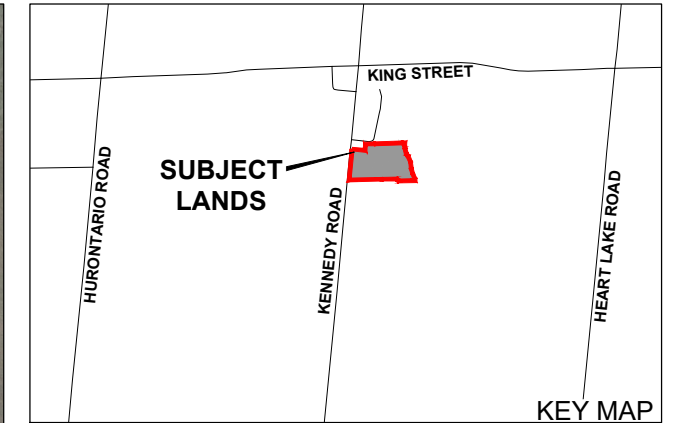
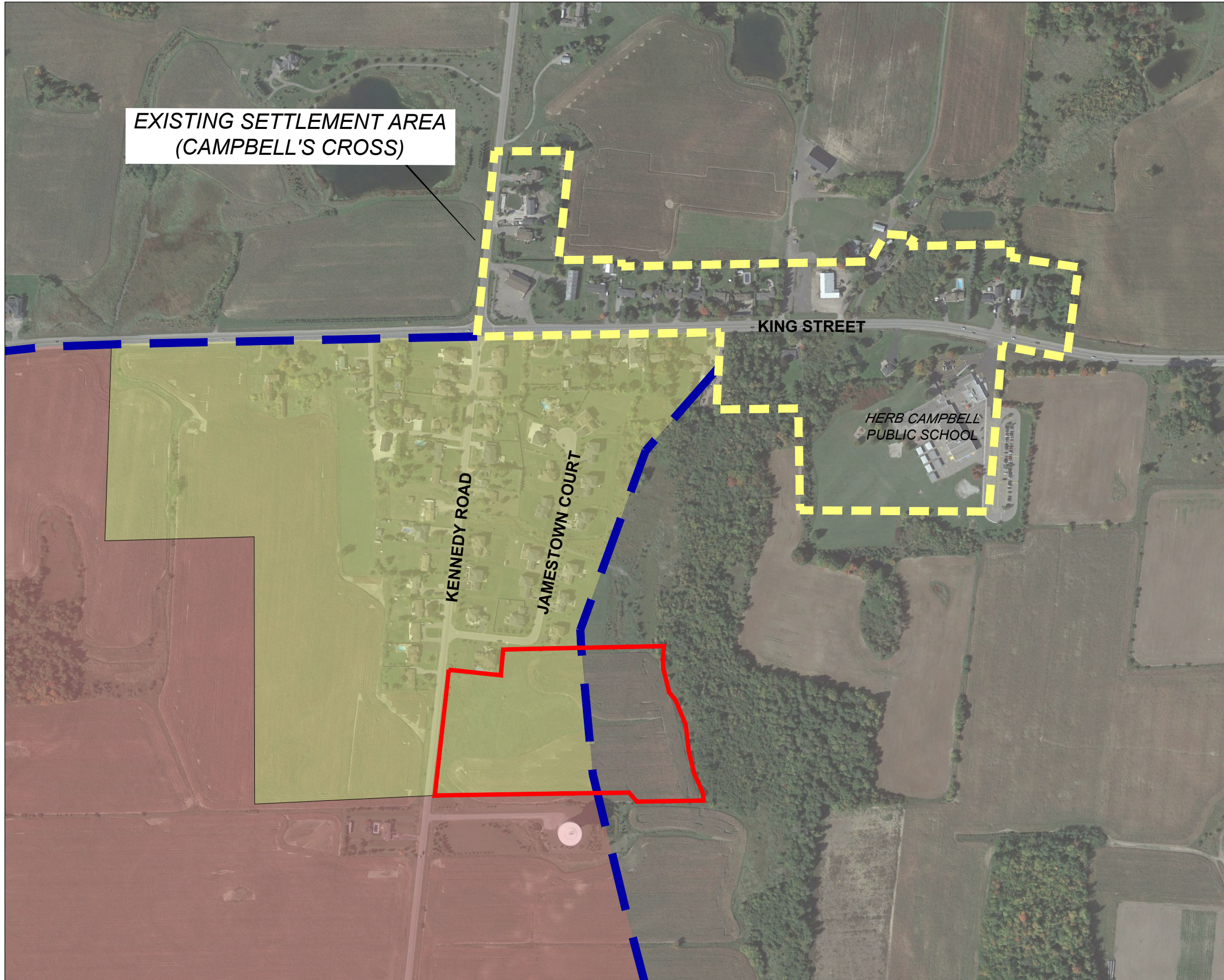


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**Patrick Pearson, MCIP, RPP**  
**Associate**

Appendix I: Settlement Area Overlay





## SETTLEMENT AREA OVERLAY

13945 KENNEDY ROAD  
PART OF LOT 27, CONCESSION 2,  
TOWN OF CALEDON  
REGIONAL MUNICIPALITY OF PEEL

- SUBJECT LANDS ( $\pm 5.77$ ha / 14.26ac)
- SETTLEMENT AREA BOUNDARY
- REGIONAL URBAN BOUNDARY
- NEW COMMUNITY AREA
- NEW EMPLOYMENT AREA



SCALE 1:5,000  
NOVEMBER 15, 2023





January 15, 2024

Bailey Loverock  
Team Lead  
Official Plan Review  
Town of Caledon  
6311 Old Church Road  
Caledon, ON L7C 1J6

Dear Bailey:

**RE: James Dick Construction Ltd. Comments on Draft Future Caledon Official Plan (August 2023)**  
**OUR FILE: 9153F**

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On behalf of our client, James Dick Construction Ltd. (JDCL), we are providing the following comments on the Town's Draft Future Caledon Official Plan dated August 2023. JDCL has been involved in the review of the Draft Official Plan and previously provided comments to the Town on April 20, 2022 & July 13, 2023. We appreciate the Town's efforts in attempting to address JDCL's comments.

**Extractive Industrial Designation**

Further to our client's request on July 13, 2023, we are pleased to see that the revised draft Official Plan correctly designates the JDCL Erin Pit Expansion as Extractive Industrial.

**Natural Features and Areas**

Section 13.3.2 of the draft Official Plan states that "additional" Natural Features and Areas may be determined after they have been evaluated through a Planning Act process. However, the policy should also contemplate the refinement of Natural Features and Areas given the mapping is presented at an Official Plan scale and may not accurately represent on-the-ground features. We recommend that the Town consider the following changes to Section 13.3.2:

*"Only those Natural Features and Areas that have been identified are currently mapped and designated Natural Features and Areas. The identification, mapping and the determination of significance of additional **or refinements to** Natural Features and Areas can only be determined after they have been evaluated through a Planning Act process, with the evaluation supported by the Town or the relevant approval authority."*

Peel's Official Plan specifically addresses refinements to the boundaries of the Greenlands System and states that local Official Plans may incorporate refinements to the Core Areas, among others, to reflect existing local natural heritage systems and refinements through development applications (see Peel OP 2.14.10).

JDCL owns lands immediately east of the Erin Pit Expansion at 17757 Shaws Creek Road (Part of Lot 12, Concession 5 WHS). The site is located within the Niagara Escarpment Plan Area and is designated Escarpment Rural Area in the Niagara Escarpment Plan. The lands are proposed to be designated Natural Features and Areas whereas they are currently designated General Agriculture Area in the Town's Official Plan.

According to Section 13.3.1 of the draft Official Plan, the Natural Features and Areas designation corresponds to the Core Areas of the Greenlands System as identified in the Region's Official Plan. However, these lands are not identified as Core Areas in the Region's Official Plan.

On Schedule D2 of the draft Official Plan, the lands are identified as "ANSI, Earth and Life Science". Section 13.3.1 states that "Provincial Life Science Areas of Natural and Scientific Interest" are included in the Natural Features and Areas designation. However, the lands are identified within an Earth Science ANSI, not a Life Science ANSI. Earth Science ANSIs are not identified in the list of features included in the Natural Features and Areas designation.

Given that the lands are not identified as Core Area in the Region's Official Plan and are not within a Provincial Life Science ANSI, we request that the proposed Natural Features and Areas designation be removed from 17757 Shaws Creek Road.

### **Prime Agricultural Areas**

Section 3.3.14 of the Peel Official Plan specifically permits the extraction of mineral aggregate resources in prime agricultural areas. This approach is consistent with the Provincial Policy Statement and applicable Provincial Plans.

Upon reviewing Section 17 of the Town's draft Official Plan, aggregate extraction is not identified as a permitted use in the prime agricultural area. To ensure conformity with the Region's Official Plan and Provincial Plans, the policies should be updated to state that aggregate extraction is permitted in prime agriculture areas in accordance with applicable policies.

### **Mineral Aggregate Resources**

It is our understanding that the mineral aggregate resources policies will be added through a future phase of the Official Plan Review in conjunction with the completion of the Town's Aggregate Resources Policy Study. As previously raised with Town staff, JDCL is requesting a meeting with the Town to discuss the status of the study and next steps.

Thank you for the opportunity to submit comments on the Town's draft Official Plan. Please keep us notified of any future meetings or decisions regarding the draft Official Plan.

If you have any questions, please let us know.



Yours truly,

**MHBC**

Neal DeRuyter, BES, MCIP, RPP

cc.     *Steve Burke, Town of Caledon*  
         *Jeff Hignett, Town of Caledon*  
         *Mark Head, Region of Peel*  
         *Greg Sweetnam, JDCL*  
         *Leigh Mugford, JDCL*