

Memo

Date: March 12, 2024

To: Members of Council

From: Steve Burke, Manager, Strategic Policy Planning

Subject: Additional Public Comments Received

The commenting period on the February 2024 draft Future Caledon Official Plan was open until end of day on March 7, 2024. The following submissions were received after the deadline. They have been reviewed but have not been provided a detailed response by staff.



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March 8, 2024

VIA E-MAIL

Our File No. 309038

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

Attention: Town Clerk, and the Official Plan Review Team
Sent only by email: agenda@caledon.ca and opreview@caledon.ca

Dear Sirs/Mesdames:

Re: February 2024 Draft Future Caledon Official Plan

Aird & Berlis LLP is counsel to the following companies, each of which have either existing landholdings or interests in lands within the Town of Caledon (collectively, "Argo"):

- *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*

We ask that our firm be placed on the list for notice of any reports, agenda items or decisions of Caledon Town Council respecting the Town's new Official Plan. Notice should be sent to the undersigned and to Argo Development Corporation - 4900 Palladium Way, Suite 105 Burlington, Ontario, L7M 0W7.

The comments provided herein are intended as Argo's written submissions in respect of the February 2024 version of the draft new Official Plan. These comments have been prepared with input from Argo's land use planning consultant (Macaulay Shiomi Howson Ltd.) and transportation and natural heritage consultant (Crozier Consulting Engineers).

March 8, 2024

Page 2

We reserve Argo’s right to provide further and/or supplemental submissions on matters of land use planning, transportation, natural heritage or other specialties with relevant input to the Town’s draft Official Plan.

These comments are also further to Argo’s comments respecting the Town’s August 2023 Draft Official Plan. As noted in those previous comments, the preparation of a new Official Plan is a major undertaking, particularly at a time when so many changes are occurring to factors that 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 a new Official Plan that provides broad, “goal-oriented” direction - not “rule-based” requirements - and ensures the Town has the flexibility to address issues appropriately as they arise. An Official Plan that provides a framework for development but does not prescribe a detailed set of rules for a future which cannot be accurately predicted. Our client’s comments are presented in the foregoing context – identifying proposed policies that will restrict the Town from achieving the best solutions to issues as they arise.

Key concerns our client and its consulting team has identified are as follows:

Key Concerns		
#	Section	Comment
Part B Town-wide Policies Section 4 Growth Management		
1.	Section 4.4 Growth Phasing and Coordination	<p>Review: The Growth Management and Phasing Plan (GMPP) has not yet been released. As a result, it is not clear what is meant by “available for development” in the context of a GMPP. Does this mean only lands in Phase 1 or does it mean if the lands are identified in the GMPP for development then secondary planning can proceed? Policies should be revised to clarify that secondary planning process can be initiated regardless of phase, and that the intent is not to delay the normal progression of development.</p> <p>Recommendation: Sections 4.4.5, 4.4.6 and 4.4.8 should be modified to clarify the meaning of “available for development” as follows (additions shown as underlined deletions as struck out):</p> <p>4.4.5 “When lands are to be made available for development according to the Growth Management and Phasing Plan, <u>regardless of which phase of development the lands are located in,</u> a secondary planning process</p>



		<p>will be initiated, in accordance with the policies of this Plan, to recommend a secondary plan for approval.”</p> <p>4.4.6 “The Growth Management and Phasing Plan will identify development priority areas for the 2021 to 2.36 period. These areas have been prioritized because they best support the continuing evolution of Caledon into a more complete community. <u>Secondary planning will be initiated for such areas as well as other areas made available for development in the Growth Management and Phasing Plan.</u>”</p> <p>4.4.8 “Notwithstanding the above, in no case will one owner or group of owners be permitted to unreasonably delay the normal progression of development <u>in any area available for development in the Growth Management and Phasing Plan contemplated by this Plan.</u> Where unreasonable delay is occurring as determined at the Town’s sole discretion, the identification of priority areas may be re-evaluated to the satisfaction of the Town in consultation with the Region.”</p>
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Key Concerns		
#	Section	Comment
Part C Town-wide Policies Section 5 Climate Change		
2.	Section 5.1 Objectives, Section 5.2 Pathway to Low-Carbon Communities, Section 5.4 Green Development Standards, Section 5.5 Urban Forest	<p>Review:</p> <p>We note that some modifications have been made to this section to recognize the limitations on the Town’s ability to enforce green development guidelines. However, the policy approach by indicating that the “Green Development Standards” will be implemented through development application requirements, and which terms what are guidelines as “standards” still implies legal authority that is misleading. The GDS can encourage, as noted in Section 5.4.3, but cannot force compliance with standards that exceed the Ontario Building Code (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. The policy approach in new Section 5.5 Urban Forest which indicates that the establishment of targets through the Urban Forest Management Plan is a more appropriate direction.</p>

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		<p>Recommendation: Modifications should be made to Sections 5.1, 5.2.4, 5.4 and 5.5 to ensure these sections reflect the Town’s legal authority in particular the direction to “encourage” rather than to “require”. Suggested revised wording is:</p> <p>Title – The title “Green Development Standards” should be changed to “Green Development Guidelines” throughout the Plan.</p> <p>5.1 “The planning objectives for climate change mitigation and adaptation are as follows:....</p> <p>b) support climate change mitigation by requiring <u>encouraging</u> new residential, employment and commercial buildings to work towards the Town’s Green Development <u>Guidelines Standards</u> and encouraging the retrofitting of existing buildings <u>for increased efficiency.</u>”</p> <p>5.2.4 “The Town will require all major <u>urban</u> development proposals to submit an alternative and renewable energy systems feasibility study, where appropriate, including consideration of solar and geothermal renewable energy installation and district and other low carbon energy systems. <u>Such a study may be submitted as part of a specific development application or as part of a secondary plan or other planning requirement.</u></p> <p>Definitions – That a definition of “major urban development” be added to the Glossary of the Plan as follows:</p> <p>“Major urban development proposals include <i>major retail</i>, a <i>major transit station area</i>, an <i>employment area</i> and an area of high density residential development.”</p> <p>5.4.1 “The Town will establish <i>Green Development Guidelines Standards</i>. <u>The opportunities to implement the Guidelines should be investigated as part of to be implemented through the development application</u></p>

March 8, 2024

Page 5

Key Concerns		
#	Section	Comment
		<p>requirements in Chapter 27, Development Application Requirements, of this Plan.”</p> <p>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 Guidelines Standards</i> process along with guidelines, tools and templates to support compliance.”</p> <p>5.5.5....a) no negative impacts <u>to <i>significant woodlands</i> while minimizing impacts to other areas of the urban forest</u> by requiring an arborist report/tree inventory and protection plan</p>
Part C Town-wide Policies Section 7 Design		
3.1	Section 7.2 General Policies	<p>Review: Section 7.2.4 c) references a “grid” road pattern. Recognizing the limitations created by factors such as intersection spacing requirements on major roads, topography and natural heritage system constraints, this should be revised to “modified grid pattern”.</p> <p>Recommendation: That Section 7.2.4 c) be modified as follows: “New communities will align new streets in a modified grid pattern to create pedestrian-scaled development blocks to ensure connectivity and better provide for active transportation.”</p>
3.2	Section 7.3 Streetscape and Street Design Sections 7.3.1 and 7.3.3	<p>Review: Additional clarity is required regarding street design to prioritize the pedestrian experience and to recognize the significance of streets for creating a complete community.</p> <p>Recommendation: That Sections 7.3.1 and 7.3.3 be modified as follows:</p> <p>7.3.1 “New streets should reflect a compact and complete form, providing necessary mobility, servicing and streetscape functions, but in a minimized width that reinforces a comfortable pedestrian scale while harmonizing with the site, building and landscape design will be designed as complete streets through the coordination of site, building and landscape design on and between individual sites.</p>

March 8, 2024

Page 6

Key Concerns		
#	Section	Comment
		<p>7.3.3 “New streets will be designed to:</p> <p>a) provide access and municipal street addresses for new development;</p> <p>b) extend <u>enhance</u> <u>site sight</u> lines and view corridors <u>to improve safety and aesthetics</u>;</p> <p>c) divide larger sites into smaller blocks;</p> <p>d) <u>create smaller blocks to improve walkability and urban connectivity</u>;</p> <p>e) <u>include pedestrian and cyclist amenities to promote active transportation</u>; and</p> <p>f) <u>balance the needs and priorities of various users and uses within the right-of-way</u>;</p> <p>g) <u>promote a safe, comfortable and attractive pedestrian environment through compact street scale and minimized building face to building face distances, with an appropriate street width to building height ratio that effectively frames the street and reinforces a comfortable walking environment</u>; and,</p> <p>f) reduce excessive vehicular speeds through compact street form, including minimize travel and parking lane widths.</p>
3.3	Section 7.9 Built Form - Building Types Section 7.9.3	<p>Review: It is unclear what the rationale is for a minimum height of 13 storeys for tall buildings. Minimum should at least reflect the current range for mid rise.</p> <p>Recommendation: That Section 7.9.3 a) be modified as follows:</p> <p>a) A Tall building is generally greater than 13 storeys in height.</p>
Part C Town-wide Policies Section 8 Economic Opportunities		
4.1	Section 8.2 General Policies	<p>Review: Conversion of Employment Areas to non-employment uses is permitted by the Provincial Policy Statement (PPS). Section 8.2.8 with respect to conversions is inconsistent with the PPS and too restrictive.</p> <p>Recommendation: That Section 8.2.8 be modified as follows: “Conversions of lands within Employment Areas to non-employment uses such as Major Retail, residential and other sensitive uses not ancillary to the primary</p>

March 8, 2024

Page 7

Key Concerns		
#	Section	Comment
		employment use <u>shall be evaluated in a manner consistent with the Provincial Policy Statement</u> will not be permitted.
4.2	Section 8.6 Planning for Specific Uses	<p>Review: Location of live-work units should be “generally” on collector or arterial roads to provide flexibility.</p> <p>Recommendation: That Section 8.6.3 e) iii) be modified as follows: iii) “Units will be <u>generally</u> located on collector or arterial roads.”</p>
Part C Town-wide Policies Section 9 Housing		
5.1	Section 9.1 Objectives	<p>Review: 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>Recommendation: 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 <u>purpose-built—rental affordable/attainable</u> housing through the establishment of a minimum target for the Town which reflects the</p>

March 8, 2024

Page 8

Key Concerns		
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		Town's unique housing market and an appropriate share of the Region's affordable housing target. <u>Actively encourage purpose built rental housing as a significant proportion of these units with the establishment of a target as a percentage of all affordable/attainable housing in the Town. In addition, the Town will work with Peel Housing Corporation to develop other programs for the provision of affordable/attainable housing. to be rental in tenure.</u>
5.2	Section 9.4 Rental Housing Supply	<p>Review Section 9.4.1 repeats the target of 25 per cent for rental housing.</p> <p>Recommendation: Suggested revised wording is: "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 <u>actively encourage the construction of purpose built rental housing with the establishment of a target as a percentage of the target for all affordable/attainable housing in the Town.</u>"</p>
5.3	Section 9.7.7 Urban Residential Properties	<p>Review: Section 9.7.7 a) establishes a standard for the construction of additional residential units which will add to the cost of housing as pre-built units will be included in the cost of homes, and require allocation of sewage and water capacity beyond what the likely demand will be. This requirement should be deleted or at the least rather than require pre-built units instead require that such units be offered for sale, leaving it to the purchaser whether they can afford the additional cost.</p> <p>Recommendation: Section 9.7.7 a) should be deleted or at least modified as follows: a) "Large residential developments on sites two <u>five</u> hectares or greater in size are required to offer <u>for sale include</u> a minimum of one <u>additional residential unit</u> within <u>20%</u> of each <u>single and semi-detached dwelling unit.</u>"</p>

March 8, 2024

Page 9

Key Concerns		
#	Section	Comment
		b) “Low density residential development applications within or abutting strategic growth areas will aim to offer for sale for at least 30 per cent of new single, <u>and semi-detached dwelling units</u> and townhouses with occupancy ready one <i>additional residential units</i> in order to contribute to rental housing stock.”
5.4	Section 9.10 Housing Options for a Diverse Population	<p>Review: Section 9.10.1 b) requires universal design features in all new multi-unit res development that will result in multiple units. This is not appropriate as it is not part of Ontario Building Code (OBC) for ground-related construction (Part 9 of OBC) and is very difficult to implement in that context. Definition of multi-unit should specify OBC, Part 3 construction buildings. otherwise, all townhouses must include this feature which is not appropriate.</p> <p>Recommendation: That Section 9.10.1 b) be modified as follows: b) “The Town will require the inclusion of universal design features in all new multi-unit development, redevelopment, and intensification that will result in multiple units <u>which are classified as Ontario Building Code, Part 3 construction buildings.</u>”</p>

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Part C Town-wide Policies Section 10 Public Service Facilities		
6.	Section 10.3 School Sites	<p>Review: 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>Recommendation: Section 10.3.1 should be modified as follows: <u>“School sites should be planned as efficiently as possible to minimize land needs including multi-storey buildings and minimum parking requirements. In addition, schools should be co-located.....”</u></p>
Part C Town-wide Policies Section 11 Transportation		
7.1	Table 11-1 Road Network Classifi- cations	<p>Recommendation: That laneway standards should be included in Table.</p>
7.2	Table 11-2 Town Daylight Triangle Section 11.3.15	<p>Recommendation: These standards are not appropriate for inclusion in the Official Plan and are more appropriate in an Engineering Standards document. If included, as noted in the GSAI comments, daylight roundings would be required versus daylight triangles. In addition, other modifications are required to ensure the requirements result in functional design as set out in the GSAI comments. In particular, it is recommended that Section 11.3.15 be modified as follows: 11.3.15 “The conveyance of daylight triangles having lesser dimensions than specified in Table C2 will only be accepted where the reduced standard is proven acceptable to the Town, subject to the criteria in this Plan <u>may be considered based on site context if validated through technical study to the satisfaction of the Town.</u>”</p>
7.3	Section 11.3.22	<p>Review: This policy conflicts with Section 7.2.5 which discourages reverse frontage lots. It is recommended that the Town encourage dual or double frontage lots or</p>

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		<p>window streets where appropriate to provide an attractive streetscape along arterial roads.</p> <p>Recommendation: That Section 11.3.22 be modified as follows: “To maintain and protect traffic capacity of all arterial and collector roadways, the number and location of intersections will be controlled by the Town by: b) Encouraging where appropriate, <u>reverse dual or double frontage for residential lots or window streets</u> on arterial roads.”</p>
7.4	Section 11.7.2	<p>Recommendation: That Section 11.7.2 be modified to allow for consideration of lay by parking on arterial roads as follows: 11.7.2....Generally, the Town will restrict on-street parking on arterial roads to reduce traffic hazard and improve traffic operations <u>however lay by parking may be considered.</u></p>
7.5	<p>Schedule C1 Town-wide Transportation Network</p> <p>Schedule F2a</p>	<p>Recommendation: 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 constraints would be appropriate, including where information is available through draft plan and other development applications. Otherwise a note should be added to both Schedules to the effect that :</p> <p><u>“Collector road system is conceptual and may be modified without an amendment to the Official Plan, including deletion, through the secondary plan process or individual development applications.”</u></p>
7.6	<p>Schedule C2 Town-wide Road Right-of - Way Widths</p>	<p>Recommendation: Based on findings within completed transportation impact studies the following road right of ways should be:</p> <ol style="list-style-type: none"> 1. Humber Station Road to be 26m or less North of King Street 2. Kennedy Road to maintain 26m south of Old School Road

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#	Section	Comment
Part D Natural Environment System, Parks and Open Space Section 13 Natural Environment System		
8.1	Conservation Authorities	All references to Conservation Authorities should be reviewed in the context of changes to the Conservation Authorities regulations to ensure their validity.
8.2	Section 13.3 Natural Features Section 13.3.5	<p>Review: Please review Section 13.3.5, it appears to include an incorrect reference.</p> <p>Recommendation: That Section 13.3.5 be revised to read as follows:</p> <p>“<u>The provisions of Section 13.3.4 do</u> 13.3.5 does not apply to Provincially Significant Wetlands and certain key natural heritage features and key hydrologic features subject to a Provincial plan where development and site alteration is not <u>typically</u> permitted. “</p>
8.3	Section 13.8 Minimum Buffers Table 13-3 Minimum Buffers	<p>Review: 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>Recommendation: 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>
8.4	Section 13.9 Natural Environment System in New Community Areas and New Employment Areas Section 13.9.10	<p>Review: Watercourses and headwater drainage features have been mapped and characterized on site by qualified biologists and fluvial geomorphologists. The Official Plan should have clear language that field verification and subsequent studies should determine the significant 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.</p>

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		<p>Recommendation: That the second sentence of Section 13.9.10 be revised as follows: “As consequence, <u>through field verification</u> and the preparation of the required secondary plans, and subwatershed or equivalent studies.....”</p>
Part D Natural Environment System, Parks and Open Space Section 14 Parks and Open Space		
9.1	Section 14.4 Park Planning and Desing	<p>Review: 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>Recommendation: That the following new sentence be added at the end of Section 14.4.1 as follows: Parks will be comprised of parkland and trails that provide active and/or passive <i>recreational</i> opportunities. <u>The use of parkland for built facilities such as community centres and other buildings for recreation purposes shall be discouraged.</u></p>
9.2	Sections 14.5.3 and 14.5.4	<p>Review: Minimum park sizes in Sections 14.5.3 and 14.5.4 should align.</p> <p>Recommendation: That Section 14.5.3 a) and Section 14.5.4 be modified as follows: 14.5.3 a) “an minimum area of <u>between 1 and 2.0</u> hectares” 14.5.4 “The Town may permit a Neighbourhood Park less than <u>1 0.8</u> ha....”</p>
9.3	Section 14.5.5	<p>Review: Some flexibility should be provided for in size of community parks similar to that for neighbourhood parks.</p>

Key Concerns		
#	Section	Comment
		<p>Recommendation: That Section 14.5.5. a) be modified as follows: a) a minimum area of 4.0 hectares to <u>although the town may permit an area of between 2 and 4 hectares provided that the park can accommodate a variety of outdoor <u>and indoor</u> recreation facilities."</u></p>
Part F Urban System Section 21 Planning the Urban System		
10.1	Figure F2a Section 21.1.2	<p>Review: This policy suggests that Figure F2a will be updated based on approved Secondary Plans. However, detailed work has already been carried out which has identified issues with the proposed plan and which should be modified. This includes 2022/2023 detailed in-season field investigations which were completed by qualified biologists for all participating lands in the Alloa Secondary Plan area, using widely accepted field protocols. A number of natural features mapped on the Official Plan schedules including Figure F2a, are not present based on field investigations and background review. This includes an area in the northwest quadrant of Chinguacousy and Mayfield as well as a number of other areas.</p> <p>Recommendation: That Figure F2a be modified to:</p> <ul style="list-style-type: none"> • Remove the Neighbourhood Centre designation on Chinguacousy as commercial and other community facilities will be concentrated along Mayfield Road; • Delete the Community Park designation in Phase 1 as the Community Park is better located to the west of Creditview Road; • Reconfigure the east/west Urban Corridor so that does not extend west past Creditview but rather extends south to Mayfield Road along Creditview given the barrier created by Highway 413 and the Natural Heritage System; • Remove the Urban Corridor from Chinguacousy Road as the location at the north end does not lend itself to the creation of such a corridor given its relationship to the planned community; and,

Key Concerns		
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		<ul style="list-style-type: none"> Remove Natural Features and Areas designation within the Alloo Planning Area on all Official Plan Schedules and Figures from the area in the northwest quadrant of Chinquacousy and Mayfield and other areas identified on the attached Figure 1.
10.2	Section 21.3.1	<p>Review: Section 21.3.1 conflicts with Section 21.1.7, which permits development within the designated greenfield area provided the Town's Chief Planner deems an ongoing secondary planning process to be sufficiently advanced.</p> <p>Recommendation: Section 21.3.1 should be deleted or revised so that it is consistent with Section 21.1.7.</p>
10.3	Section 21.3.2	<p>Review: As noted above the GMPP has not yet been released, this policy should reflect that fact in accordance with recommended wording above.</p> <p>Recommendation: That Section 21.3.2 be revised as follows: 21.3.2 "Secondary plans will be prepared and completed <u>in accordance with for areas made available for development in the</u> Town's approved Growth Management and Phasing Plan, this Plan and the Region of Peel Official Plan. The schedules that accompany each secondary plan shall be <u>generally</u> consistent with Figure F2a and/or Figure F2B, Preliminary Community Structure Plan."</p>
Part F Urban System Section 22 Community Areas		
11.1	Section 22.3 Urban Centre (Caledon Station MTSA)	<p>Review: Some flexibility for the provision of single and semi-detached should be permitted provided the overall minimum density is achieved.</p> <p>Recommendation: That Section 22.3.2 a) be modified as follows: 22.3.2 a).....A wide range of dwelling unit types are permitted, except for single detached and semi</p>

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		detached dwellings <u>unless it can be demonstrated that the minimum density for the area is achieved.</u> "
11.2	Section 22.4 Neighbourhood Centre Designation	<p>Review: Section 22.4.3 a) establishes reduced height limits for which the rationale is not provided. Previously the permitted height was 5-20 storeys and that has been revised to "as high as 12 storeys". Such restrictions are best established at the Secondary Plan based on the detailed analysis undertaken through that process.</p> <p>Recommendation: That Section 22.4.3 a) be revised to remove the height limits or at least to allow flexibility for modification at the Secondary Plan in accordance with the following.</p> <p>22.4.3 a) Buildings as high as <u>12–20 storeys</u> or as determined through a Secondary Plan may be permitted. Lower buildings heights and/or greater setbacks and stepbacks will <u>may</u> be required adjacent to existing and planned low rise neighbourhoods <u>as determined through a site specific evaluation.</u></p>
11.3	Section 22.5 Urban Corridor Designation	<p>Review: It should be possible to consider rear lane ground related residential units along Urban Corridors through the Secondary Plan process. In addition, Section 22.5.3 should align with Neighbourhood Centres with respect to height.</p> <p>Recommendation: That Section 22.5.2 be modified to allow for ground related units to be considered along Urban Corridors as follows:</p> <p>22.5.2 "A broad range of retail, service, office, cultural, 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, <u>while rear-lane ground related residential uses may be permitted in all areas of the Urban Corridor.</u>"</p>

Key Concerns		
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		<p>That Section 22.5.3 c) be modified to align with Neighbourhood Centres with respect to height:</p> <p>c) “Buildings up to 12 storeys may be permitted <u>or with maximum heights as determined through a Secondary Plan</u>. Lower building heights and/or greater setbacks and stepbacks will <u>may</u> be required adjacent to existing and planned low rise neighbourhoods <u>as determined through a site specific evaluation.</u>”</p>
11.4	Section 22.8 Major Commercial/ Mixed Use Area Designation	<p>Review: The objective of ensuring some height in these areas is appropriate but establishing specific requirements where a Secondary Plan is being prepared is best left to the detailed analysis carried out through that process.</p> <p>Recommendation: That Section 22.8.3 d) be modified to recognize the analysis carried out through the Secondary Plan:</p> <p>d) “The minimum height of any new residential building will be 4 <u>3</u> storeys and the maximum height will be 42 <u>20</u> storeys <u>or as determined through a Secondary Plan</u>. The minimum height for non-residential buildings will be two storeys, <u>one storey with two storey massing or as determined through a Secondary Plan.</u>”</p>
Part G Implementation Section 24 Official Plan Amendments		
12.1	24.3 Secondary Plans	<p>Review: Section 24.3.2 requires a phasing study/plan however it should be clear that this relates to Regional servicing.</p> <p>Recommendation: That Section 24.3.2 with respect to phasing study/plan be modified as follows:</p> <p>“a phasing study/plan that recommends how each component of the secondary plan area will be phased in a logical manner to the satisfaction of the <u>Region of Peel Town</u> and in accordance with Regional requirements <u>including with respect to the feasibility and capacity of</u></p>

Key Concerns		
#	Section	Comment
		<u>Regional</u> public <i>infrastructure</i> required for <i>development</i> ;
12.2	24.3 Secondary Plans Section 24.3.2 d) Secondary Plans	<p>Review: 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"> • Have been investigated in other jurisdictions and have been established as unworkable both physically, financially, and with respect to what 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, • 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, • 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. <p>Recommendation: 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 considers 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>

Key Concerns		
#	Section	Comment
		i) assess the feasibility..... ii) identify measures.... iii) assess the potential.... iv) establish a strategy and policy direction <u>measures...</u>
Schedules and Figures		
13.	All Schedules and Figures that identify Natural Areas including B1, B4, D1, D2a, D3, D11 and F2a	<p>Review: Throughout 2022/203, detailed in-season field investigations were completed by qualified biologists for all participating lands in the Alloo Secondary Plan area, using widely accepted field protocols. A number of natural features mapped on the Official Plan schedules including Figure F2a, are not present based on field investigations and background review. This includes an area in the northwest quadrant of Chinquacousy and Mayfield, as well as a number of other areas.</p> <p>Recommendation: Remove Natural Features and Areas designation within the Alloo Planning Area on all Official Plan Schedules and Figures from the area in the northwest quadrant of Chinquacousy and Mayfield and other areas identified on the attached Figure 1.</p>

Argo and its professional consulting team appreciate the opportunity to review the February 2024 draft of the Town’s new Official Plan and would be pleased to discuss the above-outlined comments with Town staff.

Yours truly,

AIRD & BERLIS LLP












Patrick J. Harrington

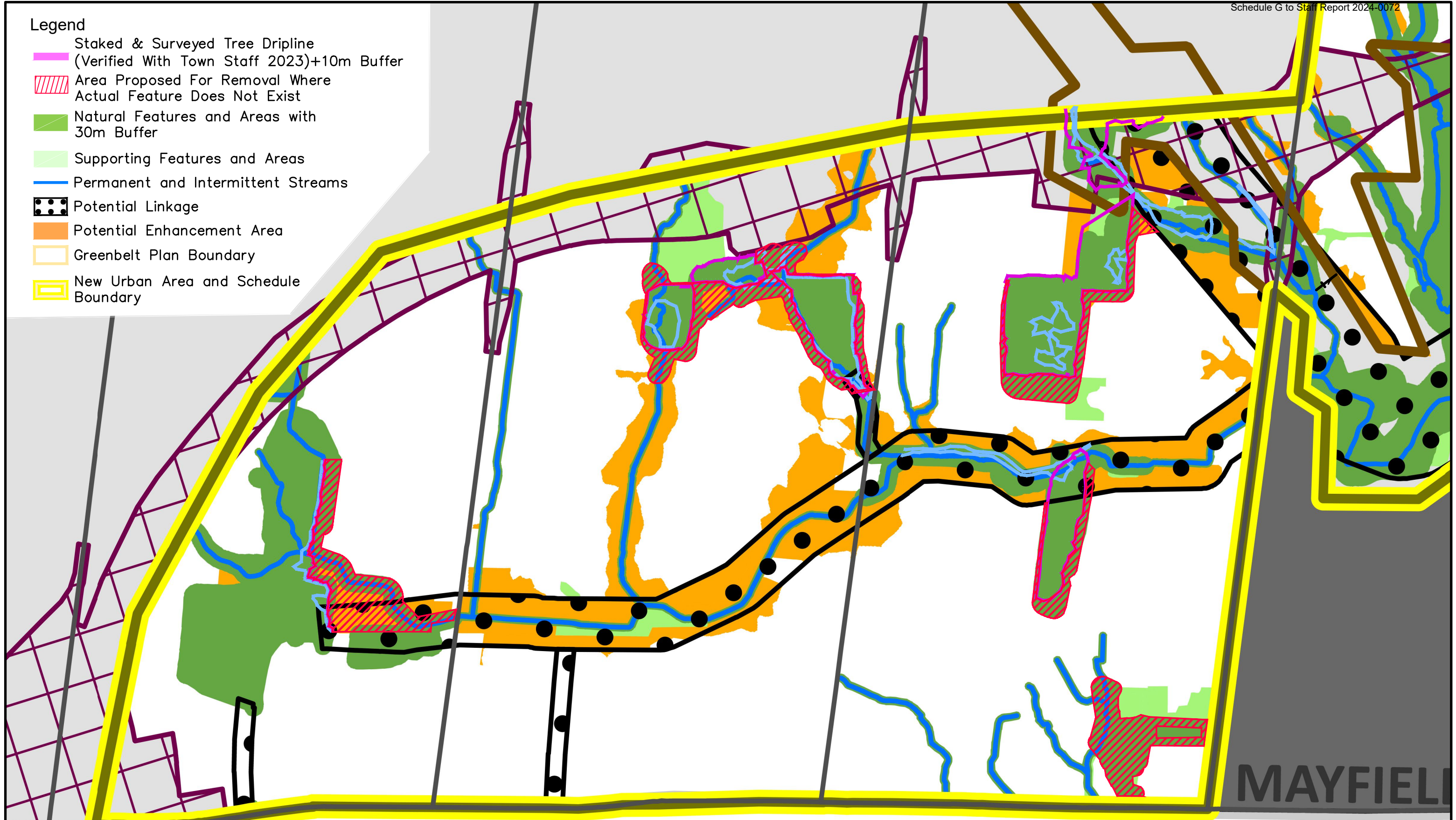
cc. Argo Development Corporation

56260761.2



Legend

-  Staked & Surveyed Tree Dripline (Verified With Town Staff 2023)+10m Buffer
-  Area Proposed For Removal Where Actual Feature Does Not Exist
-  Natural Features and Areas with 30m Buffer
-  Supporting Features and Areas
-  Permanent and Intermittent Streams
-  Potential Linkage
-  Potential Enhancement Area
-  Greenbelt Plan Boundary
-  New Urban Area and Schedule Boundary




MAYFIELD



Project
**ALLOA SECONDARY PLAN
 TOWN OF CALEDON OFFICIAL PLAN
 SCHEDULE D2a**

Drawing
**DRAFT TOWN OFFICIAL PLAN
 VS FIELD VERIFIED FEATURES**



CROZIER
CONSULTING ENGINEERS

Drawn By	L.W./N.L.	Design By	L.W./N.L./S.H.	Project	2448-6683	
Scale	1:1500	Date	MAR/07/2024	Check By	S.H./M.H.	
					Drawing	FIG.1