

## Brief Comments on Town of Caledon Official Plan Draft February 2024

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*In no order of importance.*

The following are some general and specific comments concerning adoption of the new version of the O.P. They are not a complete review of the draft O.P.

There seems to be a determination by planning staff that they are to treat the 1978 O.P. as an artifact to be eliminated and new tabula raza policies drafted as if Caledon has no valid history. This determination has not been documented.

Due to the provincial need/priority to have as many new dwelling units built as possible and the need to deal with effective policies for the 80%+/- of Caledon to remain countryside, approve O.P. sections Part B, Managing Growth and Change, Part C, Town Wide Policies, Part F, Urban System and Part G Implementation and provide for a further review of the remaining policy sections.

5.5 Urban Forest policies an excellent improvement. By contrast the Woodlands policies, 5.3.5, covering all rural areas of Caledon are characterized by "lets make a deal" to get rid of woodlands. There are no strong policies for woodland management, reforestation, enhancing existing woodlands, all linked to natural diversity and climate change. All valley and stream corridors have been used by previous farming operations for grazing and have been denuded of trees. These areas are candidate areas for trails and reforestation.

As a general comment on the new draft Caledon O.P. it lacks any imperative concerning climate change, diminished natural diversity or flood risks. It's like we are back in the early 1950's.

16.4.8 The Town must seek a Special Policy Area status for Caledon East the commercial core of which is classified as floodplain. No commercial redevelopment may occur in flood plains.

The schedules for Natural Heritage currently incorporate hazard lands with no differentiation between hazard and natural features. Hazards and natural features were combined in the O.P.A. 124 Environmental policies in 1994. The original Caledon 1978 O.P. had a separate schedule and policy for hazard lands and natural heritage areas. The separation should be revived for clarity in determining land use restrictions but also to recognize the restriction on the Conservation Authorities to hazards only while the Town is now the sole natural heritage policy jurisdiction.

Remove Caledon Village as a Designated Growth area as it has only partial services, municipal water, also high ground water table and shallow bedrock making sewage servicing problematic.

Section 2.2, Vision, is vague with values poorly articulated. With 80%+/- of Caledon covered in three environmental based provincial plans and the remaining "White Belt" area to become urban there is a need to articulate a rural and an urban vision, both remarkably different.

There is a need to articulate and incorporate a statement of the role and associated vision for Caledon in the GTA from which effective growth policy may be written. Without such a clear role and vision reflecting the unique character of Caledon, only a mechanical set of O.P. policies based on conformity to upper tier planning documents will result.

2.1 Indigenous Stewardship and Resources. The MCFN have important treaty rights under a number of treaties between 1781-1820 covering hunting, gathering, water and ceremonial matters. In addition, the Town has negotiated an important Collaboration and Partnership MOU with the MCFN. The Ajetance Treaty #19,1818 and the MOU should be included in full under section 2.1. The MOU will provide Constitutional verification to natural heritage and resource decisions made day to day by Council.

Under section 28.3 Indigenous Engagement, the Region of Peel Official Plan Chapter 7: Implementation Page 241-242 has more robust policies which should be incorporated into the Town's O.P.

#### 7.4.10 Public Consultation and Indigenous Engagement

3.2 Create a new land use designation for major fill sites in the Town. These sites will take a century or more to settle to the point where new structures will be stable. In addition, there may be low level but important pollution levels associated with the fill.

8.5.4 Drive Throughs, Car Washes, and Automobile Service Stations: Drive through retail facilities, due to their long idling periods for cars, are contrary to the Town Climate Change Policies and Land Use Compatibility provisions of the P.P.S.

8. Economic Opportunities: The stated policies seem to omit the need for accommodation for the travelling public with the exception of B&Bs. There is a significant need and opportunity for rural area inns, hotels, and affordable camp grounds. Policy provision for these accommodations should be incorporated.

Table 11.1: Road Network Classifications. Include a definition for Scenic Roads where the normal standards for curves, vertical sight lines, widths standards do not necessarily apply. Current examples are King Street from Mississauga Rd. the Winston Churchill and the Forks of the Credit Road.

11.6.4 The 413 policies should refer to the project as proposed as it has not been legally approved and no funding exists for the works.

11.6 Trucking and Goods Movement. Caledon Village, Caledon East and the Bolton area roads are over run with heavy goods movement vehicles creating noise, vibration, toxic soot emissions and danger to automobiles. These road areas require special attention studies designed to mitigate the serious over capacity traffic loads. Provide direction for a requirement for

by pass routes for Caledon Village and Caledon East should be built into approval of any new major traffic generator, such as a major warehouse, bedrock quarry or strip mining operation.

11.9.4 Development within 300 m of a major facility due to noise, vibration, dust, danger, etc. Railways, airports, major roads and gravel strip mines are examples. There needs to be a clear policy to prevent residential land uses near these facilities. In addition, there also needs clear policy direction to provide locations for unwanted but necessary land uses such a contractor's yards, wrecking yards, waste transfer yards, trailer parking, etc., probably adjacent to the major facilities cited above. See 11.9, 11. 10.

12.3.7.c, Partial Services Infilling conditional. Caledon's settlements have had a history of many private septic systems in densities above the assimilative capacity of the soils to deal with. Infilling of new dwelling units must have robust servicing tests to avoid unsustainable ground water demands and unsustainable septic effluent demands beyond what soils can absorb without having high level of nitrates in groundwater. The time-tested Palgrave Estates servicing policies must be drafted to cover the entire rural area of the Town's settlements and rural resorts.

12.3.8 States that the Town will provide full municipal sewer and water services for urban growth to 2051. Surely not. Where will an administrative district las large as Caledon with a current population of 80,000 achieve the massive funding to accommodate an additional 300,000 people by 2051?

12.5 Stormwater Management, provide explicit wording covering SWM discharges to receiving streams to protect fish populations. In addition, adopt the CSA, CAN/CSA-W202-18 (R2023), Erosion and sediment control inspection and monitoring, 2018, Published by CSA Group, Reaffirmed in 2023 [<https://www.csagroup.org/store/product/CAN-CSA-W202-18/>]

12.5.11[b, should include the established SSMP [Settlement Servicing Master Plan] planning and EA study process.

12.8 Waste Management. This service is under review by the provincial Peel Region study. Thus, the topic should remain draft at this time.

13.10.5 New Development in Significant Ground Water service areas. There policies must be included in any new aggregate strip-mine applications.

13.12.1 This policy adopts a Landscape Ecology Approach which uses a pattern language based on definitions of natural features such as wetlands woodlands, valley lands, etc. The notion of linkages between the features becomes a tack on to be optionally considered. The landscape Ecology approach is administratively convenient as through application of the definitions provides certainty to development application outcomes.

The Greenbelt Plan and Town of Caledon O.P.A. 124 [1994] adopted an Ecosystem Approach which requires the description of the physical landscape, natural environmental features and the functional relationships between them. Corridors are a key part of the Ecosystem Approach not an option. The Ecosystem Approach stresses natural relationships not a collection of visible patches to be protected in isolation.

The existing ecosystem policies in the current Caledon O.P. must be maintained and enhanced.

Trails: Caledon now has the Caledon Trailway a former C.N. Line and the recently decommissioned C.P.R./Orangeville line. These are major linear parks crossing the significant geographic features in Caledon; Niagara Escarpment, Oak Ridges Moraine, Peel Plain, Paris-Gault Moraine and Orangeville Moraine plus Credit and Humber Rivers.

These trails have a GTA wide tourist amenity and should have special policies aimed at development along with education opportunities