SUBMISSION BY JANE THOMPSON TO COUNCIL ON PROPOSED FUTURE CALEDON OFFICIAL PLAN

This is my third submission concerning the proposed Future Caledon Official Plan. I will try once more explain to Council members why the Natural Environment System policies of the proposed Plan are inappropriate for the rural area of Caledon. Contrary to what the planners have told you:

- 1. This is not "a made in Caledon Plan". It is primarily a Meridian Planning plan presented to you as a finished product. You need to have your staff analyze it and take you through it line by line to explain why this fundamental new policy approach is being recommended.
- 2. This is a development first plan acceptable for implementation through Secondary Plans. It is not an "environment first" Plan that preserves the natural heritage system in accordance with the Policy Directions Report of February 2022. Specifically, the approach of the 1978 Plan is to place all Natural Areas and all Natural Corridors in an Environmental Policy Area designation which prohibits most forms of development. The proposed Plan places only Region of Peel Core features and areas in a Natural Features and Areas designation where most forms of development are not permitted. Other features are in an overlay designation that does not limit permitted uses.
- 3. The proposed Plan introduces a "no negative impacts" test for all natural features and areas which allows for considerable site disturbance and degradation on a case by case basis.
- 4. Mr. MacDonald assured you that development would be prohibited in valley and Stream corridors by the implementing zoning by –law. This is consistent with the EPA designation in the 1978 Plan. This would not occur under the weakened policies of the proposed Plan.
- 5. **The proposed Plan does not protect 27% more area**. All the same components are in both Plans and are "protected" whether or not they are on the designation maps. Same components, same area. Only the maps have changed.
- 6. To implement the proposed Plan requires extensive expertise in natural heritage planning and in numerous scientific disciplines. These are no longer going to be provided by the Conservation Authorities. Having this expertise in house will make staffing for the processing of development applications costly. It will also be costly for rural property owners making applications.
- 7. No two experts will agree on the merits of Supporting Features and Areas or on what constitute negative impacts. Disputes and hearings would be inevitable if the Town intends to prevent inappropriate development. With CVC input, a broader protective designation could be used to avoid interpretive studies and disagreements on most rural development applications.
- 8. With appropriate changes, the other policies of the Rural System could be implemented without adopting Chapter 13. They could remain subject to the Ecological System policies of the 1978 Plan on an interim basis.
- 9. The Aggregate Resources Community Working Group will be making recommendations in the next three months that will be interrelated with the policies of Chapter 13. Adoption of Chapter 13 should be delayed until the ARCWG reports to Council. (See draft modification below.)

RESPECTFULLY SUBMITTED MARCH 25, 2024

PROPOSED MODIFICATION TO DEFER CHAPTER 13 NATURAL ENVIRONMENT SYSTEM IN RURAL AREA:

- 1) In Policy 1.2.1 add a paragraph
 - f) areas identified on Schedule E 1 Rural System with respect to Chapter 13 Natural Environment System, where the relevant policies of the 1978 Plan will continue to apply.