



AGENCY AND DEPARTMENT COMMENT SHEET

Prepared: August 26, 2025
Lead Planner: Brandon Bell, Planning Department

**Proposed Official Plan Amendment and Zoning By-law Amendment Application
Enabling More Homes in Caledon: Additional Residential Units and Multiplexes
File Numbers: POPA 2025-0013 and RZ 2025-0015**

The following department and agency comments were received regarding the above-noted application:

Credit Valley Conservation – July 23, 2025

Comment	Town Response (August 11, 2025)
<p>Per our regulatory role under the <i>Conservation Authorities Act</i>, it should be noted that ARU's will not be permitted within natural hazards/hazardous lands (e.g. flood hazards, erosion hazards, etc.), to prevent risks to life and property caused by natural hazards, and that ARUs must be in compliance with the applicable regulation approved under the <i>Conservation Authorities Act</i>.</p>	<p>The Town's Zoning By-law 2006-50, as amended, has a limiting provision in Section 2:</p> <p>Section 2.9: CONSERVATION AUTHORITY REGULATIONS No development shall be undertaken on lands that are subject to a regulation made under Subsection 29(1) of the Conservation Authorities Act without the permission of the relevant conservation authority.</p> <p>Despite any zoning regulation to the contrary, if lands are subject to a regulation, permission is required prior to development being permitted. This is the standard practice with all as-of-right uses in the zoning by-law.</p> <p>To ensure Section 2.9 is more visible in the by-law, specific to ARUs, we have added the following to the draft zoning by-law:</p> <p><i>6.4.4 Additional Residential Units shall comply with Section 2.9 "Conservation Authority Regulations"</i></p>
<p>In the Draft Official Plan Amendment (Table 3 - Proposed Changes to the 1978 Caledon Official Plan) it is noted that, "Intensification will not occur within environmental policy areas or in areas rendered inaccessible to people and vehicles during times of flooding and/or erosion hazards" (Section 3.5.3.10.4, page 13). It is recommended that, a point be added or this be reworded to better reflect CVC policies surrounding safe access requirements (e.g. In accordance</p>	<p>The proposed policy already exists in Future Caledon Official Plan, which is adopted by the Town of Caledon Council and is pending review by the Province. This policy is meant to be added to 1978 Official Plan since it will remain in force until such time it is fully repealed.</p> <p>Attached ARUs are permitted in EPA2 lands, but detached units are not. It is assumed by Town staff that proposals for an attached ARU on regulated lands will be under review by a CA, subject to specific regulations during a review by the CA. In this sense, to meet the requirements under that review, the applicant would demonstrate safe access.</p> <p>It is staff preference to keep the amendments within the scope of ARUs, and not broader environmental policies since this would</p>

<p>with CVC policies, safe access must be demonstrated when there is a proposed increase in the number of dwelling units on a property).</p>	<p>be best done through either a separate review or as part of the Comprehensive Zoning By-law review.</p>
----------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------

Dufferin-Peel Catholic District School Board – July 22, 2025

Thank you for providing Dufferin-Peel Catholic District School Board (DPCDSB) the opportunity to review and comment on the proposed City initiated Official Plan and Zoning By-law amendments.

In general, it is expected that student yields from additional residential units (ARU) and multiplexes will be similar to secondary units. Based on the student yields from the City of Mississauga and the City of Brampton, which already allow ARU’s, there has been little impact on our existing infrastructure.

Niagara Escarpment Commission – July 22, 2025

The NEC does not have any concerns with the proposed OPA language, as it recognizes that where the NEP applies, the policies of the NEP are in effect.

One comment for consideration is possibly adding additional clarity to either the settlement area policy section 5.10 Settlement, General Policy or a similar section – that clarifies this again, where the plan is in effect the NEP policies apply – specifically in Urban and Minor Urban, the policies can be a bit grey, as some of these areas are outside of Development Control however Part 2 of the plan still applies, therefore within Urban and Minor Urban Areas the local planning policy provides the use permissions however they cannot be conflict with the NEP.

As of August 18, 2025, the NEC has no further concerns or comments.

Nottawasaga Valley Conservation Authority (‘NVCA’) – July 21, 2025

<u>Comment</u>	<u>Town Response</u>
<p>NVCA’s only comment is to request to add that “in general, accessory residential units and Multiplexes are to be directed outside of natural hazards and hazardous sites”.</p>	<p>The Town’s zoning by-law contains a clause in Section 2.9:</p> <p>Section 2.9: CONSERVATION AUTHORITY REGULATIONS No development shall be undertaken on lands that are subject to a regulation made under Subsection 29(1) of the Conservation Authorities Act without the permission of the relevant conservation authority.</p> <p>This applies to any as-of-right use. Where lands are regulated, a permit is first required by a Conservation Authority prior to development being permitted. To make it more visible for those looking to build detached ARUs, language was added to the by-law:</p>



	<p><i>6.4.4 Additional Residential Units</i> shall comply with Section 2.9 “Conservation Authority Regulations”.</p> <p>Terminology respecting environmental and natural features are expected to be addressed as part of the upcoming Town-wide comprehensive by-law review.</p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Further correspondence received on August 19, 2025. The NVCA is satisfied with the responses from the Town of Caledon.

Peel District School Board – July 21, 2025

We’ve discussed the ARU’s internally and we anticipate a minimal number of students from these types of units. Also, we don’t see a significant number of these being built which also keeps our expectations low. Therefore, low concern for student accommodation. Thank you for reaching out regarding this.

Region of Peel - July 25 and 31st, 2025

Comment	Town Response
<p>Development Services The Region is in receipt of the Draft OPA, prepared by Town of Caledon staff, and offers the following comments:</p> <p>1. Please be advised that Regional infrastructure and services (e.g., water and wastewater services, roads, waste collection, etc.) must be feasible for ARU and multiplex development application proposals.</p> <p>The Region is in receipt of the Draft ZBA, prepared by Town staff, and offers the following comments:</p> <p>2. Section 3 – Additional Residential Unit definition: please consider language that specifies the ARUs are to be secondary and/or subordinate to the main dwelling unit.</p>	<p>1. Further to comments from Infrastructure, these uses will be permitted as-of-right without planning applications. Growth from ARU/Multiplex is intended to fit within the current growth projections already planned for--not in addition to.</p> <p>2. Proposed zoning requirements such as maximum floor area of a detached ARU reinforce this principle as it cannot be larger than the main dwelling.</p> <p>The zoning by-law will not require an ARU internal to the main dwelling to be a certain size (min or max). This provides maximum flexibility. We've also included a definition for main dwelling unit. The intent here is to allow at the time of building permit, for the main dwelling unit to be identified.</p> <p><i>Additional Residential Unit</i> means a self-contained dwelling unit permitted in addition to a main dwelling unit and is located within the same building, or within a detached accessory building or private garage on the same lot, as the</p>

	<p>main dwelling. The addition of an additional dwelling unit does not change a dwelling into any other type of residential building typology.</p> <p>Dwelling, Main (or Main Dwelling) means the primary dwelling unit on a lot.</p>
<p>Housing Development</p> <p>Housing Development staff appreciate the references that ARUs provide for a range of housing options and affordability.</p> <p>1. Proposed Policy 5.10.3.14 (p. 8): please consider language that encourages dwelling units to be affordable to low- or moderate-income households.</p> <p>The definition of ‘affordable’ housing can be found in the definition section of the Provincial Planning Statement and Affordable Residential Units for the Purposes of the Development Charges Act, 1997 Bulletin. The definition of ‘low- and moderate-income households’ is provided in the Provincial Planning Statement.</p> <p>2. Proposed policy 3.5.3.10.7 a) and b): please consider language that encourages ARU rough-ins, including providing separate entrances, fire and safety requirements (such as fire separation of separate entrance), larger basement windows, and adequate ceiling heights as part of pre-construction sales</p>	<p>1. This suggestion was implemented. It was also carried over to the same policy in the Future Caledon OP as well:</p> <p>Multiplex dwellings are encouraged to be affordable to low-or moderate-income households. [9.3.2a)vi)]</p> <p>2. The existing policy (3.5.3.10.7) is preferred since it encourages an ARU within each detached unit in clause a), rather than limited to rough-ins.</p> <p>Also, staff have concerns with requiring larger basement windows and "adequate" ceiling heights since these are elements prescribed by the Ontario Building Code.</p>
<p>Transportation Development</p> <p>1. Any proposed access to Regional Roads shall adhere to the Region’s Controlled Access By-law 62-2013, which speaks to the Road Characterization Study (RCS). The RCS defines the Region’s various road classifications as well as the associated minimum access spacing distances requirements.</p>	<p>Noted.</p>

Further correspondence received on August 15, 2025. The Region is satisfied with the responses from the Town of Caledon.

Region of Peel – Water and Wastewater Infrastructure Planning Team – August 22, 2025

Based on the current capacities of the water and wastewater infrastructure systems, together with planned upgrades, sufficient servicing capacity is available to accommodate the Town’s projected growth within the settlement areas of Caledon East/Mono Road, Inglewood, Mayfield West, and Bolton to the year 2051. This includes the projected multiplex conversions of up to four units per parcel within the planned settlement areas, consistent with the Town’s growth strategy. The Region will continue to monitor system performance and implement planned infrastructure improvements to ensure that water



and wastewater servicing remains aligned with the Town’s growth needs throughout the planning horizon.

Toronto and Region Conservation Authority – July 29, 2025

Comment	Town Response
<p>The Official Plan (OP) Glossary of Terms should be clear that multiplexes and ARUs constitute intensification in accordance with the PPS definition, which includes the expansion or conversion of existing buildings. We note that as part of the proposed OPA, the definition for the term ‘Residential Intensification’ is being revised to exclude ARUs; this seems contradictory to the existing definition of “new residential units through accommodation in existing buildings...” Please clarify.</p>	<p>This is a definition of the 1978 Official Plan, which will not be applicable once Future Caledon Official Plan is in force and effect. ARUs have already been excluded, however as part of our proposed amendments, we have simply revised the terms from “apartments-in-houses and garden suites” to “additional residential units”.</p> <p>As a result, no further changes to the proposed amendments are anticipated at this time.</p>
<p>Further, we recommend other terms also be defined in the Glossary. Specifically, Natural Hazards, Flood Hazard, and Erosion Hazard, as these terms are often referenced within the text of the OP.</p>	<p>Consistency of terms between Official Plan and Zoning By-law are very important as it facilitates a more accurate interpretation. As discussed, this work is not related to the objectives of the proposed amendments but would be appropriate during a comprehensive review to implement our new Future Caledon OP.</p> <p>As a result, no further changes to the proposed amendments are anticipated at this time.</p>
<p>Please add a provision to the Zoning By-law Amendment on the potential site-specific constraints to ARUs and multiplexes regarding flooding, erosion, and natural hazards, and for clarifying that these are areas where intensification through the creation of ARUs should not be permitted. We recognize that the Town’s By- law includes zones that capture these areas such as Environmental Policy Area Zones 1 and 2 (EPA1, EPA2). However, for the benefit of users of the By-law, we recommend that these areas be defined as terms in Section 3. Specifically, we recommend including definitions for the following terms: Hazardous Lands/Natural Hazards, Flood Hazard, and Erosion Hazard.</p>	<p>Same as above regarding adding terms. Also, the by-law already considers situations where the by-law may permit development in an area regulated by the Conservation Authorities Act.</p> <p>Staff interpret this section as a notwithstanding clause and would require approval from the Conservation Authority:</p> <p>2006-50, as amended, Section 2.9: CONSERVATION AUTHORITY REGULATIONS No development shall be undertaken on lands that are subject to a regulation made under Subsection 29(1) of the Conservation Authorities Act without the permission of the relevant conservation authority.</p> <p>No further changes to the proposed amendments are anticipated at this time.</p>

<p>In accordance with the PPS, (2024), TRCA would not support intensification through the creation of ARUs within hazardous lands associated with valley and stream corridors (i.e., flooding, erosion and/or unstable slopes), in other areas important for natural hazard management (e.g., watercourses, wetlands, shorelines), and in areas rendered inaccessible to people and vehicles during times of flooding and/or erosion hazards.</p> <ul style="list-style-type: none"> • Section 11 (Table 11.1, Environmental Policy Area Zones) – Please include a provision stating that ARUs will not be permitted in an EPA 2 Zone where the Zone contains lands determined by the Conservation Authority to be hazardous lands. • Section 6.4 (Residential Zones) – Please include a provision stating that ARUs are not permitted in Residential Zones where the Zone contains lands determined by the Conservation Authority to be hazardous lands. 	<p>Acknowledged. As per the previous comment response, Section 2.9 applies across the entirety of the by-law.</p> <p>Regarding Section 11, EPA2 zones do not permit detached ARU (as per the proposed amendment, Table 6.4). ARUs within the existing building are permitted, however it is understood by Town staff that if the lands are regulated, a review and or permit may be required by TRCA (or other CA depending on location). As such, adding this restriction may be too restrictive if the opportunity may be available on a site-specific basis to support the use (i.e. hazardous lands on property but proposed suite in house is situated away and can be supportable by TRCA staff).</p> <p>Regarding Section 6.4, adding this provision would be too restrictive. It would preclude all lots having hazardous lands (no matter the percentage of total area) from having an ARU. As discussed, site-specific reviews by TRCA may permit the ARU based on its location from specific features/areas. Again, Section 2.9 of the by-law require CA approval to permit development as well as the Conservation Authorities Act (Section 28) is applicable law for the purposes of a building permit (Ontario Building Code, Division A, Article 1.4.1.3).</p> <p>Comprehensive zoning by-law reviews may yield an opportunity to better articulate restrictions using definitions and specific environmental provisions. It is recommended that our Conservation Authority partners have further discussions with Town policy and environment planning teams about this opportunity.</p> <p>To increase visibility of Section 2.9, the following has been added to the Additional Residential Units provisions:</p> <p><i>6.4.4 Additional Residential Units shall comply with Section 2.9 “Conservation Authority Regulations”.</i></p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The following departments and agencies had no comments:

Enbridge Gas	Hydro One	Rogers
Town of Caledon, Building Services	Town of Caledon, Development Engineering	Town of Caledon, Transportation