

April 19, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands North-West Corner of Columbia Way and Mount Hope Road, Town of
Caledon
Town File Number: RZ 2024-0006C (Area A8)
Region File Number: RZ 24-006C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands north-west corner of Columbia Way and Mount Hope Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.), a Growth Management and Phasing Plan supported by Town of Caledon Council, as well as the lack of infrastructure capacity in the existing system (i.e. servicing, an adequate transportation/transit network, etc.) being available to the lands. In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). This area should be serviced through the north as part of the secondary plan being undertaken.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Furthermore, with the significant infrastructure required, further discussions on the financing of those services are also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment like this one.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is planned for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 20 net hectares.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application within this area which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment will not conform to the Region of Peel Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

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Suite B
Brampton, ON
L6T 4B9
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**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore, on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it relates to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP satisfactory, nor does it reflect the requirements of the phasing plan and the outcomes of the identified opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

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Brampton, ON
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In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment are not included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure mater plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town’s Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town’s borders and upstream and downstream to support all Bill 23 municipal pledges.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town’s Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, except this application. The Region has been involved in a pre-consultation process for proposed applications; however, we understand that a formal application(s) has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA1 zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1 zone should also include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region’s Official Plan*.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1 zone can be refined through the processing of further development applications. This text would support the ability

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for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

The Region would encourage permitting Multiplex as a use with the appropriate standards in the RM-X zone, considering Townhouses and Apartment Buildings are permitted.

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Brampton, ON
L6T 4B9
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- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-X-H-XX and RM-X-HH zones which requires a minimum width of 6 metres for a private road/street or lane.
- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.

With respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

- Paragraph 3 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 3) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

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Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0006, by applying a Holding (“H”) symbol to each of the zones: RMD-X-H-XX, RM-X-H-XX, CC-X-H-XX and EPA1.

While at first glance it may appear that the EPA1 zone would not warrant an “H”, the limits of the EPA1 zone may not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 4.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary

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Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.

- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.d) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The last two remaining holding provisions (9 and 10) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Healthy Development Assessment and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RM-X-H-XX RMD-X-H-XX CC-X-H-XX EPA1-H-XX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RM -X-H-XX, RMD-X-H-XX, CC-X-H-XX and EPA1-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the

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L6T 4B9
tel: 905-791-7800

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		<p>Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide</p>
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10 Peel Centre Dr.
Suite B
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		<p>Growth Management and Phasing Plan has been:</p> <ol style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation</p>
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10 Peel Centre Dr.
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L6T 4B9
tel: 905-791-7800

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		<p>from the Region of Peel that:</p> <ol style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>10. The Owner has received written confirmation</p>
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10 Peel Centre Dr.
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		<p>from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There does not appear to be parking rates established for Non-Market Housing or Multiplex in either zone. In the CC-X zone, there is a reduced parking rate proposed for all uses permitted. With a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required

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to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Town of Caledon
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

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Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

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**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Between Chinguacousy Road and Creditview Road, Between Mayfield Road
and Old School Road, as well as the North-West Corner of Creditview Road and
Mayfield Road, Town of Caledon
Town File Number: RZ 2024-0008C (Area A1)
Region File Number: RZ 24-008C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between Chinguacousy Road and Creditview Road, between Mayfield Road and Old School Road, as well as the north-west corner of Creditview Road and Mayfield Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1), Small Agricultural Holdings (A3) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

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The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.), a Growth Management and Phasing Plan supported by Town of Caledon Council, as well as the lack of infrastructure (i.e. servicing, an adequate transportation/transit network, etc.) being available to the lands. In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, with the significant

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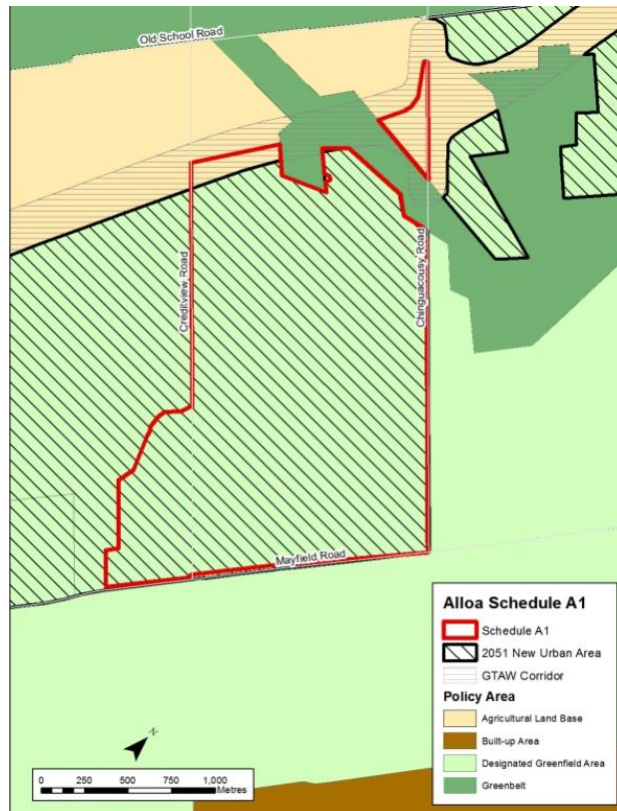
infrastructure required, further discussions on the financing of those services are also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment like this one.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Rural System – Lands Outside of the 2051 New Urban Area

The proposed Zoning By-law Amendment schedule indicates that lands outside of the 2051 New Urban Area and within the Rural System, will be rezoned for urban (residential) land uses – see image below.



The proposed Zoning By-law Amendment seeks to rezone lands within the Rural System in the vicinity of the Focused Analysis Area of the GTA West Corridor.

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In accordance with the current, in effect, Planning legislation, a municipal comprehensive review (a Regional Official Plan Amendment) is required to expand the Urban System prior to the lands being rezoned. The proposed Zoning By-law Amendment does not conform to the Regional Official Plan*.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is planned for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 252 net hectares which results in 5% of all lands within the 2051 New Urban Area and 8% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application within this area which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment will not conform to the Region of Peel Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore, on*

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July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it relates to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP satisfactory, nor does it reflect the requirements of the phasing plan and the outcomes of the identified opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment are not included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify

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servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, except this application. The Region has been involved in a pre-consultation process for proposed applications; however, we understand that a formal application(s) has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- Prior to the approval of the Zoning By-law Amendment, the area to be rezoned shall be amended to be entirely within the 2051 New Urban Area limits.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA-1-CCC-HDD zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA-1-CCC-HDD zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

In addition, Credit Valley Conservation has indicated that the EPA-1-CCC-HDD zone as identified on the schedule of the proposed By-law does not acknowledge other potential environmental lands including a regulated wetland at 1850 Mayfield Road. In reviewing the approximate location of this wetland, it appears that the

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Greenlands System identified in the Regional Official Plan* includes this wetland as part of the mapping of features.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA-1-CCC-HDD zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of "Non-Market Housing", unless there is no other way. In reviewing the various housing typology definitions in the Town's Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example

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would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

- The applicant is encouraged to explore the opportunity for co-locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery and Private Home Day Cares are not permitted uses within a Live-Work unit within the RMD-AAA-HDD zone. The Region would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-AAA-HDD and C-BBB-HDD zones which requires a minimum width of 6 metres for a private road/street or lane.
- In the most recent version of the proposed Zoning By-law Amendment, a provision has been added which restricts the location of Motor Vehicle Gas Bars, Motor Vehicle Washing Establishments and Drive-Through Service Facilities to be on lots abutting Mayfield Road. Mayfield Road is a Regional Road subject to a controlled access by-law at the Region. Any proposed access to/from Mayfield Road will need to adhere to the by-law and be supported by appropriate studies.
- Through the pre-consultation discussions had on the lands at the north-west corner of Creditview Road and Mayfield Road, the Region indicated a need for an access road through the subject lands to the Alloo Reservoir. While Regional staff do not see anything which would prevent this in the proposed C-BBB zone, the Region would like confirmation of this from the Town; or an amendment to ensure an access road is permitted.
- Paragraph 2 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: "Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan". This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

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However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 2) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0008, by applying a Holding (“H”) symbol to each of the zones: RMD-AAA-HDD, C-BBB-HDD and EPA1-CCC-HDD.

While at first glance it may appear that the EPA1-CCC-HDD zone would not warrant an “H”, there are specific uses and definitions which would provide permissions for certain types of infrastructure (defined broadly) to be constructed prior to the holding provisions being satisfied. In addition, the limits of the EPA1-CCC-HDD zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing specified in the Holding condition 3.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that the limits of the Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

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- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-AAA-HDD C-BBB-HDD EPA1-CCC-HDD	Part of Lots 18 to 22, Concession 3 and 4 WHS (Chinguacousy)	Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law. With respect to the lands <i>zoned</i> Mixed Density

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		<p>Residential – Exception AAA – Holding DD (RMD-AAA-HDD), Commercial – Exception BBB – Holding DD (CC-BBB-HDD) and Environmental Policy Area 1 Zone – Exception CCC – Holding DD (EPA1-CCC-HDD) the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and,
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		<p>f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p> <ol style="list-style-type: none"> Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ol style="list-style-type: none"> a satisfactory Servicing Report for the Secondary Plan area has been received and
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		<p>implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s);</p> <ul style="list-style-type: none"> b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);
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		<ul style="list-style-type: none"> e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the</p>
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		<p>development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There are a number of parking standards being amended (i.e. number of parking spaces required, parking space size, permitting encroachments into the parking spaces and allowing garbage/recycling bins to be located within required parking spaces). In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With these proposed reductions and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.
- The proposed By-law schedule shows that portions of the GTA West Corridor are to be rezoned. Planning legislation requires that transportation corridors be protected. The correct corridor width and location should be validated by the Ministry of Transportation. The Region is aware of comments from the Ministry of Transportation in the past for similar circumstances which would not be in support of rezoning the lands. The Town should be consulting with the Ministry of Transportation on this topic.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law includes no maximum building area and minimum landscape area (10% of the front yard). There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

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tel: 905-791-7800

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Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Town of Caledon

Agenda@caledon.ca

Bindu Shah, Town of Caledon

Tanjot Bal, Town of Caledon

Carmine Caruso, Town of Caledon

Adam Miller, Toronto and Region Conservation Authority

Dorothy DiBerto, Credit Valley Conservation

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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April 19, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Between Chinguacousy Road and Hurontario Street (Highway 10), South of
Old School Road, Town of Caledon
Town File Number: RZ 2024-0015C (Area A4)
Region File Number: RZ 24-015C
Related Files: Proposed Official Plan Amendment (POPA 2023-0006)**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between Chinguacousy Road and Hurontario Street (Highway 10), south of Old School Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.), a Growth Management and Phasing Plan being supported by Council, as well as the lack of infrastructure (i.e. servicing, an adequate transportation/transit network, etc.) being available to service the lands today. In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, with the

infrastructure improvements required, further discussions on the financing of those services may also required, recognizing some infrastructure is planned for from a Development Charges perspective, to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

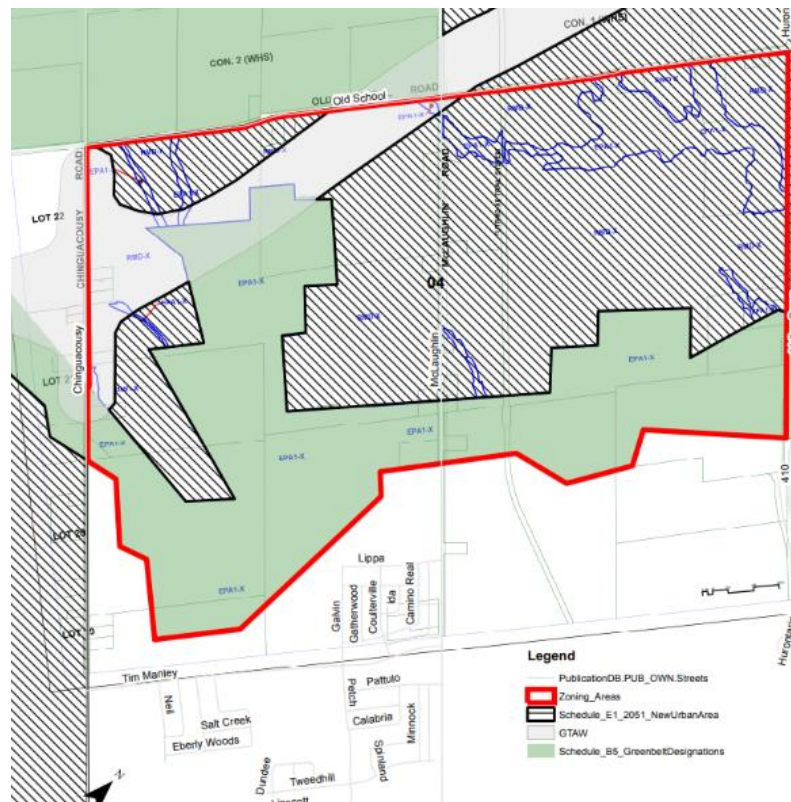
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While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment like this one.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Rural System – Lands Outside of the 2051 New Urban Area

The proposed Zoning By-law Amendment schedule indicates that lands outside of the 2051 New Urban Area and within the Rural System, will be rezoned for urban (residential) land uses – see image below.



In accordance with the current, in effect, Planning legislation, a municipal comprehensive review (a Regional Official Plan Amendment) is required to expand the Urban System prior

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10 Peel Centre Dr.
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tel: 905-791-7800

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to the lands being zoned. The proposed Zoning By-law Amendment does not conform to the Regional Official Plan*.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is planned for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 164 net hectares which results in 4% of all lands within the 2051 New Urban Area and 5% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. Although the Region has received notice of a proposed Secondary Plan application for these lands (File No. POPA 2023-0006), the Secondary Plan and its supporting material is not yet satisfactory and has not yet been approved. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment will not conform to the Region of Peel Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore, on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

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Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory, nor does it reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

The Growth Management and Phasing Plan and the studies outlined above as required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative to deliver servicing infrastructure in an efficient, financially sustainable and effective manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. Servicing of this community requires the extension of sanitary trunk sewers on Chinguacousy Road and McLaughlin Road, as well as construction of a sanitary sewer pumping station within McLaughlin Road's vicinity. The development will also require extension of the existing 600 mm diameter watermain on Chinguacousy Road and extension of a 400 mm diameter watermain on McLaughlin Road. In addition to the construction of a new 400 mm diameter watermain on the proposed east-west collector road (south of Old School Road), 600 mm diameter watermain on Hurontario Street and a 750 mm watermain on Old School Road. Further servicing comments have been provided in response to the related Official Plan Amendment application and are attached to this letter.

In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

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Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Town has received a Proposed Official Plan Amendment (File No. POPA 2023-0006) for the lands, which was circulated to the Region for review and comment. The Regional comment letter, attached, indicated that the application was premature and additional information was required.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- Prior to the approval of the Zoning By-law Amendment, the area to be rezoned shall be amended to be entirely within the 2051 New Urban Area limits.
- The limits of the proposed Focused Analysis Area of the GTA West Corridor and the limits of the Greenbelt Plan are not shown on the Schedule and should be, similar to other zoning schedules.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA1-X zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1-X zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

- Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1-X zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use. In addition, the use is missing from the “Permitted Uses” column of the Zoning By-law.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.
- There is a discrepancy between the uses permitted in the EPA1-X zone and the standards included in the same zone. The standards refer to elements associated with residential uses (swimming pools, porches, decks, garages, etc.). The zone should be updated to remove discrepancies and ensure that the EPA1-X zone has restricted uses to ensure environmental protection of the area.

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- The permitted uses column of the proposed Zoning By-law has a number of uses which are either not defined or categorized in accordance with the Town's Zoning By-law. Please clarify by amending the uses, using the existing defined terms in the Town's Zoning By-law or creating additional definitions. The definition of "Commercial Uses" is extremely general and may be interpreted to mean a variety of land uses which may include uses which are not compatible with residential uses such as industrial uses. These uses would also require setbacks, parking standards, general provisions, etc. and may require further review, consideration and comment from the Region.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The applicant is encouraged to explore the opportunity for co-locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery and a Private Home Day Care are not permitted uses within the RMD-X zone and would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-AX zone which requires a minimum width of 6 metres for a private road/street or lane.
- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.
- Paragraph 5 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: "Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan". This is not specified anywhere within the By-law. If the Town intends on requiring Secondary

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 5) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0015, by applying a Holding to each of the zones: RMD-X-H-XX and EPA1-H-XX.

While at first glance it may appear that the EPA1-X zone would not warrant an “H”, there are specific uses and definitions which would provide permissions for certain types of infrastructure (defined broadly) to be constructed prior to the holding provisions being satisfied. In addition, the limits of the EPA1-X zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

- The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 4.a. is unclear:
- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that

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10 Peel Centre Dr.
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L6T 4B9
tel: 905-791-7800

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the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.d) speaks to the requirements for ensuring a successful transportation network, including transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, water and wastewater services and affordable housing, are dedicated to the Region.
- The last two remaining holding provisions (9 and 10) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Healthy Development Assessment and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-X-H-XX EPA1-H-XX	[to be inserted]	Until such time as the Holding Symbol is removed, no person shall use the lands to which the letter (H) applies for any use other than the use which legally

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L6T 4B9
tel: 905-791-7800

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		<p>existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-X-H-XX and EPA1-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations
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Suite B
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L6T 4B9
tel: 905-791-7800

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		<p>of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <ol style="list-style-type: none"> 2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). 3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been: <ol style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). 4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). 5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure. 6. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies
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		<p>as well as any other required development or <i>Planning Act</i> application(s);</p> <ul style="list-style-type: none"> b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).
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		<p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There are a number of parking standards being amended (i.e. number of parking spaces required, parking space size, permitting encroachments into the parking spaces and allowing garbage/recycling bins to be located within required parking spaces). In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With these proposed reductions and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law indicates that no maximum building area or minimum landscape area is required. There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.

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- The proposed By-law is located to the south of the Brampton-Caledon Airport. Certain land uses and building heights may impact the operation of the airport. The Region is aware that in the past the Airport has been consulted and provided comments on applications within the Mayfield West Phase 2 Secondary Plan Area. The Town should be consulting with the Airport on this application.
- The proposed By-law schedule shows that portions of the GTA West Corridor are to be rezoned. Planning legislation requires that transportation corridors be protected. The correct corridor width and location should be validated by the Ministry of Transportation. The Region is aware of comments from the Ministry of Transportation in the past for similar circumstances which would not be in support of rezoning the lands. The Town should be consulting with the Ministry of Transportation on this topic.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time, it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments. The Region has and will continue to provide more detailed comments on the proposed Official Plan Amendment application (File No. POPA 2023-0006).

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and that infrastructure is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and

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tel: 905-791-7800

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holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Municipal Clerk
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

Appendix I: Regional Comments POPA 23-0006C – February 13, 2024

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February 13, 2024

Tanjot Bal, MCIP, RPP
Acting Manager
Development, Planning Department
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6

**RE: Proposed Official Plan Amendment
Mayfield West Phase 2 – Stage 3
0 Chinguacousy Road, 12502 McLaughlin Road, 12711 McLaughlin Road, 0
Old School Road, 0 McLauhglin Road, 12760 Hurontario Street Part of Lot
22, Concession 2; Parts of Lots 19 and 20, Concession 2; Part of Lot 21,
Concession 1; Part of Lot 22, Concession 1
Matthew Corey c/o Malone Given Parsons Ltd. (MGP) on behalf of
Brookvalley Project Management Inc.
Town File Number: POPA-2023-0006
Region File Number: OZ-23-006C,**

Dear Tanjot Bal,

Region of Peel staff have received the materials in support of the above-noted application filed to the Town of Caledon an Official Plan Amendment (OPA) for a privately- initiated Secondary Plan to expand the Mayfield West Settlement Boundary that proposed to comprise of approximately 4,551 new residential units within a mixture of low and medium density residential, commercial, institutional, parks and open space uses and a public road network. The lands subject to this proposed amendment ('subject lands') are bound by Hurontario Street to the east, Old School Road to the north, Chinguacousy Road to the west and the Mayfield West Phase 2 Secondary Plan boundary to the south.

As per the 2051 Region of Peel Official Plan (2051 RPOP), the current proposed Secondary Plan area is identified within the 2051 New Urban Area

Planning and Development

2051 Region of Peel Official Plan

The proposed Secondary Plan lands are identified within the Urban System and Designated Greenfield Area in schedule E-1 and E-3 of the Peel Region Official Plan. Other portions of the land are designated Rural system and is located outside the Regional Urban Boundary. Schedule E-2 identifies Agricultural Land Base and

Greenbelt Area on the portion of the subject lands outside of the Regional Urban Boundary. Furthermore, Schedule F-1 shows that the Conceptual GTA West Corridor and Transitway Corridor bisects the subject lands.

The policies of the Peel Region Official Plan and, in particular, section 5.6.20 Designated Greenfield Areas apply to the review of the Secondary Plan. As noted, a majority of the Secondary Plan are also identified within the 2051 New Urban Area subject to policies in Section 5.6.20.14.

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Revised materials and a fulsome assessment will be required to demonstrate how the proposed application satisfies the policies and contributes to the overall objectives of the Region of Peel Official Plan and matters that are required prior to the Town approving Official Plan Amendments for new Secondary Plans. These include but are not limited to the need for secondary plan areas, a Staging and Sequencing (Phasing) Plan, the structure of a connected transportation system and other technical studies required by the Region and Town including those identified below:

- A Staging and Sequencing Plan;
- Structure of a connected transportation system;
- A detailed Subwatershed study or equivalent study;
- A Community Energy and Emissions Reduction Plan;
- A Climate Change Adaption Plan;
- An Agricultural Impact Assessment;
- A Housing Assessment;

As described above, the Region of Peel Official Plan outlines the necessary studies and matters that are required to be satisfactory to the Region and the Town prior to the Town approving Secondary Plans within the 2051 New Urban. At this time, these items remain outstanding and the policy directions within the Region's Official Plan have not been fully addressed, therefore the Local Official Plan Amendment has not satisfied the requirements for exemption from Regional approval in accordance with Regional by-law 1-2000.

A Staging and Sequencing (Phasing) Plan

As per RPOP policy 5.6.20.14.16, Approval of secondary plans by the Town within the 2051 New Urban are to proceed only in accordance with staging and sequencing (Phasing) plans to the satisfaction of the Region. The staging and sequencing plan must ensure orderly, fiscally responsible and efficient progression of development that is coordinated with the Region's Capital Plan, Peel Water and Wastewater Master Plan, and Transportation Master Plans. At the moment, this phasing plan has not yet been approved by the Town to the satisfaction of Peel Region.

Structure of a connected transportation System

Regional Official Plan policy 5.6.20.14.12 requires the Town to permit approval of secondary plans within the 2051 New Urban Area only after the structure of a connected transportation system is planned to the Region's satisfaction. This includes

a conceptual alignment of a transit system for an East-West high order transit corridor.

Furthermore, Regional Official Plan policy 5.6.20.14.14 requires the Town to permit approval of secondary plans in the 2051 New Urban Area that include residential units beyond approximately an initial 10,000 units only after the jurisdiction and financing mechanisms for a complete local transit system are established to the Region's satisfaction.

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A Detailed Subwatershed Study or Equivalent Study

In accordance with New Urban Area policies of the Region Official Plan a detailed subwatershed study or an equivalent study is required prior to endorsing land uses for the secondary plan and prior to the adoption of the official plan amendment to implement the secondary plan. The policies require: (1) terms of reference to be prepared to the satisfaction of the Region and Town in consultation with the conservation authorities and relevant agencies; and (2) confirmation that the subwatershed study or equivalent study addresses the direction, targets, criteria and recommendations of broader scale or scoped subwatershed studies applicable to the 2051 New Urban Area. The Region completed a Scoped Subwatershed Study as part of the Peel 2051 Regional Official Plan Review Settlement Area Boundary Expansion Study. The scope Subwatershed Study provides natural heritage and water resource system management recommendations, direction, criteria and guidance to address how settlement expansion will be planned to avoid, minimize, and mitigate potential negative impacts.

Recommended terms of reference for the preparation of detailed subwatershed studies to support secondary planning are provided in the Scoped Subwatershed Study (See Part B Report: Appendix F). A copy of the study report is available on the Peel 2051 Regional Official Plan Review project website - <https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp>. In order to address these requirements, Regional staff recommends that either:

- 1) A broader scale detailed subwatershed study be prepared to guide secondary planning for future expansions of Mayfield West to ensure that water management and natural heritage system planning is coordinated and integrated as part of the comprehensive planning framework for the 2051 New Urban Area; or
- 2) If a smaller staged secondary plan is considered for this 'in process' application, confirmation that an equivalent study such as a Comprehensive Environmental Impact Study and Management Plan (CEISMP) has been completed in accordance with terms of reference satisfactory to the Region and Town, in consultation with the conservation authorities and relevant agencies, that addresses the above noted policy direction for the 2051 New Urban Area.

CEISMP

If an 'equivalent study' approach is preferred, the first submission CEISMP (and related technical reports) should be reviewed on the basis of updated terms of reference, and, if necessary, updated to confirm that it comprehensively addresses the direction, targets, criteria and recommendations of the Region's Scoped Subwatershed Study.

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At a minimum, this should include confirmation from the Town and TRCA that:

1. The characterization, impact assessment and management recommendations for the secondary plan have considered the impact of planned urban development within the broader catchment area(s) impacted by the secondary plan;
2. The appropriate hydrologic, hydraulic and hydrogeologic modelling of potential impacts has been undertaken and that further modelling/assessment of future planned development at a broader catchment(s) scale is not needed;
3. The CEISMP includes assessments of impacts associated with climate change for relevant study components (e.g., hydrology, flooding and stormwater);
4. The recommended surface and ground water management recommendations have considered and/or addressed requirements within the broader subwatershed/catchment(s) based on the impact analysis; and,
5. The CEISMP and proposed secondary plan has addressed the natural heritage system targets of the broader Scoped Subwatershed Study and are to be achieved and integrated within the secondary plan.

If an 'equivalent study' CEISMP approach is preferred, it is recommended the study terms of reference identify both a primary (of the secondary plan area itself) and secondary study area encompassing the broader subwatershed surface and groundwater water catchments potentially impacted by the secondary plan as a basis for completing the impact assessment components for the secondary plan.

In this location, the Toronto and Region Conservation (TRCA) are the Region's technical advisors with regards to flooding and erosion. Prior to the Region's support of the CEISMP for the LOPA, TRCA must be satisfied that any technical comments, should TRCA have any, have been sufficiently addressed.

Agricultural Impact Assessment (AIA)

It is Regional staff's opinion that the AIA report completed by Stantec Consulting will require further revisions in order to more clearly document how policies in the Growth Plan in the ROP have been satisfied. The Region undertook a Phase 1 and Phase 2 AIA as part of the 2051 Peel Official Plan Settlement Area Boundary

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Expansion. The proponent's submitted AIA, as part of the first submission materials, has not referenced this material or findings. A copy of the study report is available on the Peel 2051 Regional Official Plan Review project website - <https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp>. Regional staff recommend that the currently submitted AIA incorporate AIA requirements for this secondary plan.

In considering that the majority of the boundaries for the secondary plan are adjacent to planned future urban areas within the 2051 New Urban Area or are adjacent to narrow Greenbelt valleys with limited potential for ongoing agricultural uses to continue, the Town may also wish to request the applicant revise the submitted AIA including addressing what mitigation, if any, might be appropriate to consider as part of the secondary plan for edge planning of adjacent agricultural uses.

Community Energy and Emission Reduction Plan and Climate Change Adaption Plan

The Community Energy and Emissions Reduction Plan (CEERP) and The Climate Change Adaption Plan (CCAP) are new study requirements for each secondary plan area to address Peel Region official Plan policies 5.6.20.14.17d) i) to v) and 5.6.20.14.17 e) i) to ii) and will require terms of reference to be prepared to the satisfaction of the Town.

- A terms of reference has been drafted and shared with the Town. It can be provided as a reference guide for the preparation of the two studies.

Housing Assessment

For planning applications of approximately 50 units or more, RPOP policies require the submission of a Housing Assessment that is consistent with local and Regional housing objectives and policies to demonstrate contributions towards Peel-wide new housing unit targets shown in [Table 4](#) of the 2051 Region of Peel Official Plan. These targets are determined through the [Peel Housing and Homelessness Plan](#) and the [Regional Housing Strategy](#). A satisfactory Housing Assessment will be a requirement prior to adopting a privately initiated official plan amendment for a new secondary plan.

It is acknowledged that the applicant has included housing analysis in a planning opinion report and other aspects of their submission. Following our review, we offer the comments below and are willing to meet with the applicant to review opportunities to further contribute to Peel-wide housing units targets:

Affordability:

- To contribute to the Peel-wide affordable housing target and to address policy 3.5.3.6 of the Town of Caledon Official Plan, the applicant is encouraged to provide units at prices that are affordable to low- or moderate-income households. The definition of 'affordable housing' can be found in the Glossary section of the RPOP. Information on pricing (sale price,

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average rent) and affordability period (i.e., 25 years or more) of units can be provided.

- While it is anticipated that units identified to address moderate-income needs will be predominantly provided by the private sector, partnerships between the applicant, Peel Region, the Town of Caledon, and the non-profit sector should be included to provide units that are affordable to low-income households.
- As part of the applicant's contribution to the Peel-wide new housing unit target for affordability, the applicant should consider a contribution of land or units to the Region and/or a non-profit housing provider to be used for affordable housing. Peel staff would be interested in working with applicant to establish terms of such a contribution involving the Region of Peel and/or connecting the applicant with a non-profit housing provider.

Density:

- It is appreciated that the applicant is demonstrating a contribution towards the density target by proposing that rear-lane and stacked townhouses comprise the majority of the anticipated number of dwelling units. The applicant is encouraged to review opportunities for rental tenure and more housing choice by incorporating additional residential units (ARUs) in a certain number of detached and semi-detached homes and townhouses, or having the option of ARU rough-ins. The applicant is encouraged to explore opportunities to promote affordable through secondary rental where feasible.

Additional Comments:

- This application is located within an area that is a priority community for child care expansion. The applicant is encouraged to explore the opportunity of co-locating a licensed childcare centre within the proposed development, such as in ground floor mixed-use or indoor amenity spaces, where feasible. Please contact Paul Lewkowicz at paul.lewkowicz@peelregion.ca who can connect the applicant with staff in the Region of Peel's Human Services Early Years and Child Care Services Division.
- The applicant is encouraged to incorporate universal accessibility and design features into the proposed development.

Additional Planning Comments:

Planning Justification Report (PJR)

The planning opinion by MGP needs to be comprehensively reviewed and updated to demonstrate that policy requirements of the Provincial Policy Statement, Growth Plan, Greenbelt Plan and 2051 Regional Official Plan have been fully addressed.

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ROP Greenlands System

Core Areas of the Greenland System, and Natural Areas and Corridors are identified on the subject lands. The requested MZO, LOPA and ZBA, as proposed, will permit residential, commercial and mixed commercial and residential uses within Core Areas of the Regional Greenlands system. At minimum, the Core Areas of the Greenlands System must be mapped as identified in the ROP and reflect the Environmental Policy Area designation identified on the Land Use Plan in the Planning Opinion Report prepared by MGP (dated July 2022) to accurately reflect the limits of the natural heritage feature(s) and areas with an appropriate zoning designation to ensure its protection.

Bill 150, Planning Statute Law Amendment Act, 2023

On October 23, 2023, the Minister announced that modifications made to various official plans through the Provincial approval process will be reviewed and reversed. On November 16, 2023, Bill 150, the Planning Statute Law Amendment Act, 2023 was introduced, which proposed winding back ministerial modifications to approved official plans in twelve municipalities, including Peel Region. Bill 150 received Royal Assent on December 6, 2023, therefore the changes from Bill 150 are in-effect at this time.

As a result of Bill 150, any Provincial modifications being reverted would come into effect as adopted by Regional Council on April 28, 2022, retroactively to the date of Provincial approval on November 4, 2022. Any decisions on applications already in progress seeking planning permissions and appeals are required to conform to the RPOP as legislatively approved under the Planning Statute Law Amendment Act.

Through approval of the RPOP, a portion of the subject lands were modified by the Province from the Prime Agricultural Area designation to the Rural Lands designation. As this modification was reverted to the Council-adopted RPOP through Bill 150, the designation of the adjacent lands has reverted to Prime Agricultural Area as specified in the Council-adopted November 4, 2022 RPOP.

Minimum Densities

As per RPOP policy 5.4.19.7, development within Designated Greenfield Areas in Caledon is required to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. We ask that the applicant please clarify the total gross area and net developable area for the proposed expansion to the Mayfield West Settlement Boundary Area, as well as the proposed density of residents and jobs per hectare for the secondary plan.

Integration of Mixed/Non-residential uses

We encourage the applicant to explore opportunities to integrate mixed/non-residential uses into the proposed development. Peel staff would like to stress that

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Suite A
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L6T 4B9
tel: 905-791-7800

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planning for jobs is critical to maintaining a healthy economy, furthering economic development objectives, and contributing to the development of complete communities.

Transportation Planning

Schedule F-1 shows that the Conceptual GTA West (GTAW) Corridor and Transitway Corridor bisects the subject lands. Please note that the provided land use plan incorrectly shows the location of the GTAW corridor to the northwest of the subject lands, which should be rectified.

- Portions of the subject lands as shown on the Conceptual Development Plan are within the Focused Analysis Area (FAA 2020) land protection boundary for the Highway 413 project. Lands within the FAA are being protected as they may be directly impacted by the Highway 413 transportation corridor, ancillary uses, or if refinements are made to the route during the preliminary design stage.
- The application will need to be circulated to the Ministry of Transportation and Ministry of Energy for review and input.
- Consistent wording and policies set out as per 5.6.20.14.21.1 of the Region Official Plan regarding the GTA West Preliminary Route Planning Study Area will need to be included in the Secondary Plan policies.

The Region's 2019 Long Range Transportation Plan does not anticipate the road widenings identified in the Traffic Impact Study (authored by GHD) dated July 2022, it only forecasts widening Mayfield Road between Chinguacousy Rd and Hurontario St from 2 lanes to 4 lanes. Furthermore, an ongoing Transportation Master Plan is being developed to contribute insights for potential regional road enhancements in Caledon as part of the growth scenario analysis.

Development Engineering

A Functional Servicing Report and Staging Plan is to be revised and submitted to the Region for review and approval to demonstrate sufficient capacity; showing in detail how the sanitary and water servicing will be provided to the Developer's Lands and how the sanitary and water servicing relates to the broader area within the entire Mayfield West, Phase 2 Stage 3 Block Plan. Notwithstanding this, the Region has determined that the existing system can accommodate the proposed development and that the infrastructure required to service the development can be constructed through proceeding subdivision applications and reviewed through associated engineering submissions to ensure the infrastructure is designed and constructed to Regional Standards.

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Wastewater

- Municipal sanitary sewer facilities consist of a 450mm diameter sewer on Chinguacousy Road and a 600mm diameter sewer on McLaughlin Road.
- A Functional Servicing Report (FSR) showing proposed sanitary sewer servicing plans for the development and provision for the adjacent land is required for review and approval by the Region prior to the engineering submission.
- Servicing of this development requires extension of sanitary trunk sewers on Chinguacousy Road and McLaughlin Road, as well as construction of a sanitary sewer pumping station within McLaughlin Road's vicinity.
- External easements and construction will be required.

Water

- The lands are located within Water Pressure Zone 7 supply system.
- Existing infrastructure consist of a 600mm CPP watermain on Chinguacousy Road 900mm CPP and a 400 PVC watermain on McLaughlin Road.
- A Functional Servicing Report (FSR) showing proposed water servicing plans for the development and provision for the adjacent land is required for review and approval by the Region prior to the engineering submission.
- Extension of the existing 600mm dia watermain on Chinguacousy Road and extension of a 400mm dia watermain on McLaughlin Road will be required. Also construction of a new 400mm dia watermain on the proposed east-west collector road (south of Old School Road), 600mm dia watermain on Hurontario Road and a 750mm watermain on Old School Roas will be required.
- External easements and construction will be required.

General

- All costs associated with servicing proposed development will be at the applicant's expense.
- Servicing of this Plan will require construction of oversized watermains and sanitary sewers, including sanitary sewer pumping station, which are the financial responsibility of the Region as per Development Charges By-law and Policy F40-06.

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- Should the Developer wish to proceed with the works in order to obtain clearance of the Draft Plan Conditions at a time when the Region is not prepared to fund the works, then the Developer will be required to enter into a Front-Ending Agreement prior to the construction of the works. This Agreement will be subject to the Region's determination that it has or will have sufficient funds to justify entering into the Front-Ending Agreement, Regional Council approval and has to comply with Regional Policy F40-06.
- The Front-Ending/Subdivision Agreement will contain clauses related to the Development Charges reimbursements. The DC reimbursements will be subject to satisfactory completion of the external watermains and sanitary sewers, sanitary forcemains and Sanitary Sewer Pumping Station (if applicable), upon preliminary acceptance of the services and until sufficient number of buildings is constructed to eradicate watermain flushing programs and for buildings to generate enough sewer flow for self-cleansing velocity in the sanitary sewer pipes.
- The required oversized watermains and sanitary sewers are included in the Regional Capital Forecast as follows:

Sanitary Sewer and Watermains

Component No.	Project No.	Construction Year	Description
53977	24-1182	2026	600mm dia. watermain on Chinguacousy Road
51621	24-1187	2026	400mm dia. watermain on McLaughlin Road
57196, 57198	29-1198	2029	400mm dia watermain on the east-west collector road between Chinguacousy Road and Hurontario Road
51583, 51585	26-1189	2028	750mm dia watermain on Old School Road between Chinguacousy Road and Hurontario Road
56871	18-1184	2025	600mm dia watermain on Hurontario Road from Mayfield Road to the east-west collector road
36246	28-1181	2030	450mm dia sanitary sewer on Chinguacousy Road
51624	29-2199	2035	450mm dia sanitary sewer on Chinguacousy Road
51628	29-2198	2033	Sanitary trunk sewer on internal road off Chinguacousy Road
51628	29-2198	2033	Sanitary trunk sewer on internal road
33586	25-2189	2025	525mm dia sanitary sewer on McLaughlin Road
51632	24-2188	2026	525mm dia sanitary sewer on McLaughlin Road
51634	29-2198	2033	525mm dia sanitary sewer off McLaughlin Road
51918	24-	2026	Sanitary sewer pumping station on

56953	2185		McLaughlin road

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tel: 905-791-7800

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- The developer will be required to enter into applicable Development Agreement with appropriate agencies.
- The developer will be required to obtain and dedicate easements as required by the Region for Regional infrastructure.
- All sanitary sewers and watermain works within Chinguacousy and McLaughlin Roads (including the Sewer Pumping Station) must be coordinated and installed as part of the Town of Caledon’s road widening projects.

Functional Servicing Report (FSR) Review

The proposed development increases population above the Scenario 16 forecast for the SGU. The following comments are subject to change should the proposed population, water demands, and sanitary flows change:

Wastewater

The 2022 Preliminary FSR does not provide any information on estimated sanitary flows, as the land use type is still to be decided by the Official Plan Amendment.

The Urbantech FSR (August 2017) did account for flows from the subject area in sizing the downstream sewers, and this report used a more conservative allowance of 80 people/Ha compared to the 60 people/Ha estimated for the subject area in the 2023 Aecom report. The sewers downstream of the subject area in the 2024 DC are the same size as what is proposed in the Urbantech FSR. Therefore, there is expected to be capacity in the system to accommodate sanitary flows from the subject area based off the current population estimates.

At this stage, the sanitary flows of the development proposed in the preliminary FSR can be accommodated by the existing system, and by using a new sewage pumping station on McLaughlin Road in the interim. To help service the interim solution, the following DC projects and their respective estimated construction start dates, are required:

For the subject area east of McLaughlin Rd:

- 525 mm on McLaughlin Rd south of the creek -2025
- McLaughlin SPS and force main crossing creek –2026
- 525 mm on McLaughlin Rd north of the creek -2026
- Ultimately, the eastern half of the subject lands will be serviced by the planned 1200-mm Hurontario St trunk main. The anticipated start of construction for the 1200-mm Hurontario Trunk Sewer is 2029.

For the area west of McLaughlin Road:

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- 450 mm on Chinguacousy Rd -2030

The following are recommended for the future FSR:

- The sanitary servicing plan should take into account the latest DC projects. The 2021 DC infrastructure map used for the preliminary FSR has been superseded by the 2024 DC map.
- The sanitary servicing maps and what is written in the report text should be consistent
- The latest Peel Region's sanitary sewer design criteria should be used to estimate sanitary flows.

Water

The 2022 Preliminary FSR does not provide any information on estimated water demands, as the land use type is still to be decided by the Official Plan Amendment. However, the 2023 Aecom 'Mayfield West Phase 2 -Stage 3 Water Supply Feasibility Study' report and associated 'Alternate Supply Option Evaluation' memo do provide preliminary estimates. The hydraulic modelling by Aecom found that the Alloa PS has surplus capacity to supply the proposed water demands until 2031, after which capacity can be provided by equipping Alloa PS with its fourth pump.

At this stage, the water demands of the development proposed in the preliminary FSR can be accommodated by the existing system and by utilizing the spare capacity in the Alloa PS. To help service the subject area, the following DC projects and their respective estimated construction start dates, are required:

- 600-mm main on Hurontario St -2025
- 10 ML West Caledon elevated tank and 750-mm main up Mississauga Road and along Old School Road from the elevated to subject area -2026
- 600-mm main on Chinguacousy Rd -2026
- 400-mm main on McLaughlin Rd -2026

The following are recommended for the future FSR:

- The water servicing plan should take into account the latest DC projects. The 2021 DC infrastructure map used for the preliminary FSR has been superseded by the 2024 DC map.
- The water servicing maps and what is written in the report text should be consistent.
- The latest Peel Region's Watermain Design Criteria should be used to estimate water demands.
- Hydraulic modelling should be updated with the proposed water servicing and latest Peel Region DC projects to confirm that fire flows can be met.

Hydrogeological Review

- The report prepared by Palmer and dated July 4, 2022 provides a summary of the monitoring done for the proposed amendment. Results of water quality

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sampling are also provided and a general water balance and review of the Source Water Protection areas is also presented in the report. A monitoring plan or a contingency plan is not included in the report but has been mentioned to be included in a future Environmental Impact Report. The Region does not have any concerns with the report to support the proposed Official Plan Amendment provided that additional investigations and details will be provided to the Region for review and approval through completion of the Environmental Impact Report.

Public Health

Please note, an updated version of the HAD is available. Please submit the correct HDA tool from these links:

- [Development applications resources - Region of Peel \(peelregion.ca\)](https://peelregion.ca/healthy-communities/#res) and <https://peelregion.ca/healthy-communities/#res>
- For the purposes of this review, Peel staff have compared this with the newer tool for commentary.
- The HDA submitted in support of the Official Plan amendment for these lands has reached a pass on the tool and a Gold threshold overall. The site is on its way to creating a healthy built form. We have no objections to the Official Plan Amendment, but we wish to offer the comments below to further enhance the site design:
 - To support active building frontages, we recommend orienting any of the commercial and medium density residential, linearly along the street to promote active street frontages.
 - Please label sidewalks within the development. We recommend the inclusion of sidewalks on both sides of the road at a minimum of 1.5 m, however where it is not possible, we recommend a wider sidewalk of 1.8m on one side of the road.
 - Consider permeable paving where possible within the development along with a variety of street trees that are hardy, resilient and low maintenance, planted at equal intervals adjacent to the streets.
 - For any block sizes that exceed 80 by 180m in size, please include walkways to break up the block and provide enhanced connectivity.

Waste Management

- All single and non-stacked townhouse units would be eligible to receive Region of Peel curbside cart-based waste collection of garbage, recycling, and organics provided that the requirements outlined in Sections 2.0 and 3.0 of the Waste Collection Design Standards Manual (WCDSM) are met;
- All multi-residential Apartment and stacked townhouse units would be eligible to receive Region of Peel front-end waste collection of garbage and

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recycling provided that the requirements outlined in Section 2.0 and 4.0 of the waste collection design standards manual are met;

- Retail and Employment units will be required to receive private waste collection
- For more information, please consult the following:
 - The Waste Collection Design Standards Manual available at: <https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf>
- Through proceeding development stages a Waste Management Plan will be required to demonstrate how the WCDSM will be met.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4093, or by email at: patrick.amaral@peelregion.ca

Yours truly,



Patrick Amaral MES (PI)
Principal Planner
Development Services, Region of Peel



April 19, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Generally Between The Gore Road and Humber Station Road, South of
Healey Road, Town of Caledon
Town File Number: RZ 2024-0009C (Area A5)
Region File Number: RZ 24-009C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands generally between The Gore Road and Humber Station Road, south of Healey Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1), Rural Residential (RR) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.), a Growth Management and Phasing Plan being supported by Council, as well as the lack of infrastructure (i.e. servicing at this time, an adequate transportation/transit network, etc.) being available to the lands. In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, with the significant infrastructure improvements required, further discussions on the financing of those services is also required to ensure fiscal responsibility for the Town and Region.

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Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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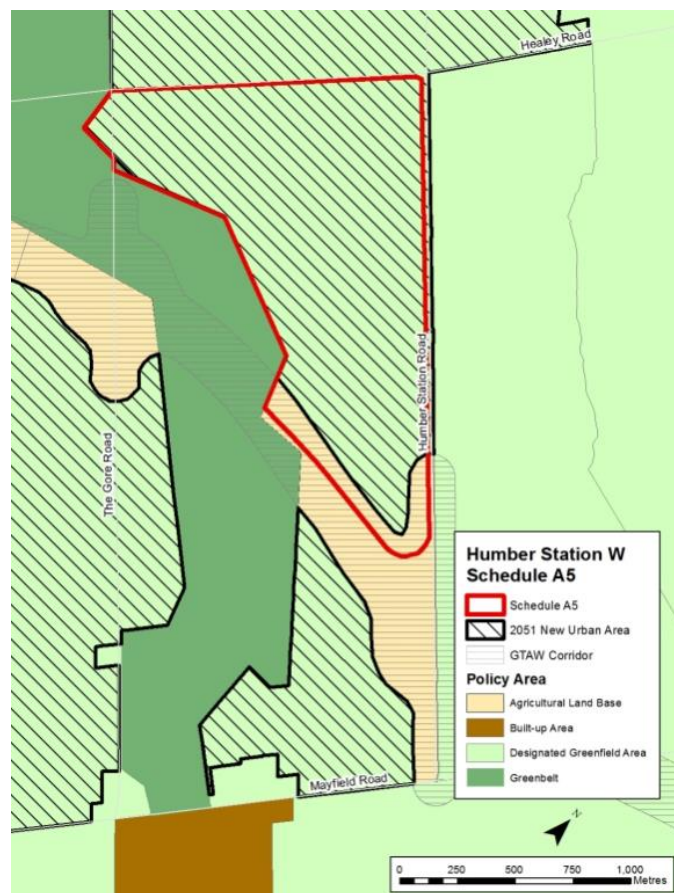
Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Rural System – Lands Outside of the 2051 New Urban Area

The proposed Zoning By-law Amendment schedule indicates that lands outside of the 2051 New Urban Area and within the Rural System, will be rezoned for urban (residential) land uses – see image below.



In accordance with the current, in effect, Planning legislation, a municipal comprehensive review (a Regional Official Plan Amendment) is required to expand the Urban System prior to the lands being rezoned. The proposed Zoning By-law Amendment does not conform to the Regional Official Plan*.

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2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is planned for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 110 net hectares which results in 2% of all lands within the 2051 New Urban Area and 4% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment will not conform to the Region of Peel Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and

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Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it relates to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory, nor does it reflect the requirements of the phasing plan and the outcomes of the identified opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment are not included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

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Brampton, ON
L6T 4B9
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Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, except this application.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- Prior to the approval of the Zoning By-law, the area to be rezoned shall be amended to be entirely within the 2051 New Urban Area limits.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA2 zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA2 zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not. In addition, the lands should be zoned an EPA1 zone not an EPA2 zone, for added protection.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA2 zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

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Suite B
Brampton, ON
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For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the by-law for those uses.

The Region would also encourage permitting a Multiplex as a use with the appropriate standards in the RM-X zone. This same zone permits townhouses and apartment buildings.

- The applicant is encouraged to explore the opportunity for co-locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery is not a permitted use within the RMD-X1 zone and would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the

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vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-X1-H-XX, RMD-X2-H-XX and RM-X-H-XX zones which requires a minimum width of 6 metres for a private road/street or lane.

- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.

With respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

- Paragraph 3 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 3) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

- Paragraph 4 of the By-law appears to be a duplicate of Paragraph 3 and should be deleted.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0011, by applying a Holding (“H”) symbol to each of the zones: RM-X-H-XX, RMD-X1-H-XX, RMD-X2-H-XX and EPA2-H-XX.

While at first glance it may appear that the EPA2-H-XX zone would not warrant an “H”, the limits of the EPA2-H-XX zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 5.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary

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Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.

- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RM-X-H-XX RMD-X1-H-XX RMD-X2-H-XX EPA2-H-XX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RM-X-HH, RMD-X1-H-XX, RMD-X2-H-XX and EPA1-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions

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Suite B
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L6T 4B9
tel: 905-791-7800

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		<p>Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation</p>
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Brampton, ON
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		<p>from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p> <ol style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands.
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L6T 4B9
tel: 905-791-7800

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		<p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ol style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies.
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L6T 4B9
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		<p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There appears to be zone provisions which would restrict the parking of motor vehicles in the driveway within the RMD-X1 zone. In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With the proposed restriction and silence on parking rates, together with a limited public

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Brampton, ON
L6T 4B9
tel: 905-791-7800

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transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.

- The proposed By-law schedule shows that portions of the GTA West Corridor are to be rezoned. Planning legislation requires that transportation corridors be protected. The correct corridor width and location should be validated by the Ministry of Transportation. The Region is aware of comments from the Ministry of Transportation in the past for similar circumstances which would not be in support of rezoning the lands. The Town should be consulting with the Ministry of Transportation on this topic.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding

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provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Town of Caledon
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

April 19, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands on the West Side of Torbram Road, North of Mayfield Road, Town of
Caledon
Town File Number: RZ 2024-0007C (Area A7)
Region File Number: RZ 24-007C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands on the west side of Torbram Road, north of Mayfield Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1), Open Space (OS, OS-416, OS-416-E) and Environmental Policy Area 2 Zone (EPA2) zones to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.), a Growth Management and Phasing Plan supported by Town of Caledon Council, as well as the lack of infrastructure at this time (i.e. servicing, an adequate transportation/transit network, etc.) being available to the lands. In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, with the significant infrastructure required, further discussions on the financing of those services are

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment like this one.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is planned for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 11 net hectares.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment will not conform to the Region of Peel Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume*

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory and reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment, are not included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, with the exception of this application. The Region has been involved in a pre-consultation process for proposed applications; however, we understand that a formal application(s) has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following be included in the By-law:

- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA1-X zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1-X zone should be amended to reflect the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1-X zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- There is a discrepancy between the uses permitted in the EPA1-X zone and the standards included in the same zone. The standards refer to elements associated with residential uses (swimming pools, porches, decks, garages, etc.). The zone should be updated to remove discrepancies and ensure that the EPA1-X zone has restricted uses to ensure environmental protection of the area.
- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use. In addition, the use is missing from the “Permitted Uses” column of the Zoning By-law.

- The housing types proposed appear to be very limited. The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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- The permitted uses column of the proposed Zoning By-law has a number of uses which are either not defined or categorized in accordance with the Town's Zoning By-law. Please clarify by amending the uses, using the existing defined terms in the Town's Zoning By-law or creating additional definitions. The definition of "Commercial Uses" is extremely general and may be interpreted to mean a variety of land uses which may include uses which are not compatible with residential uses such as industrial uses. These uses would also require setbacks, parking standards, general provisions, etc. and may require further review, consideration and comment from the Region.
- The applicant is encouraged to explore the opportunity for co-locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery and a Private Home Day Care are not permitted uses within the RMD-X zone and would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-AX zone which requires a minimum width of 6 metres for a private road/street or lane.
- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.
- Paragraph 5 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: "Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan". This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 5) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0007, by applying a Holding (“H”) symbol to each of the zones: RMD-X and EPA1-X.

While at first glance it may appear that the EPA1-X zone would not warrant an “H”, there are specific uses and definitions which would provide permissions for certain types of infrastructure (defined broadly) to be constructed prior to the holding provisions being satisfied. In addition, the limits of the EPA1-X zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 4.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.

- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.d) speaks to the requirements for ensuring a successful transportation network, including transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, water and wastewater services and affordable housing, are dedicated to the Region.
- The last two remaining holding provisions (9 and 10) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Healthy Development Assessment and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-X-HX EPA1-X-HX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-X and EPA1-X the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment,

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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		<p>submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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		<ol style="list-style-type: none"> 2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). 3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been: <ol style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). 4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). 5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure. 6. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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		<p>sewer services, which may include the payment of fees and posting of required securities; and,</p> <p>d. there is sufficient municipal water and sanitary sewer capacity to service the lands.</p> <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <p>a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s);</p> <p>b. a satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application;</p> <p>c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and,</p> <p>d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p>
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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		<p>9. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There are a number of parking standards being amended (i.e. number of parking spaces required, parking space size, permitting encroachments into the parking spaces and allowing garbage/recycling bins to be located within required parking spaces). In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With these proposed reductions and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law indicates that no maximum building area or minimum landscape area is required. There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

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Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

**RE: Caledon Strong Mayor Powers - Proposed Zoning By-law Amendment
Lands Generally for the Lands Between Kennedy Road, Heart Lake Road, North of
Mayfield Road, and South of Highway 410, Town of Caledon
Town File Number: RZ 2024-0004C (Area A9)
Region File Number: RZ 24-004C
Related File: Proposed Official Plan Amendment (File No. POPA 2021-0010)**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between Kennedy Road, Heart Lake Road, North of Mayfield Road, and South of Highway 410. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

While these lands are designated as Residential Policy Area A and Environmental Policy Area in the Mayfield West Secondary Plan (Schedule 'B' in the Town of Caledon Official Plan), the Town's Official Plan requires that lands within the Residential Policy Area A designation require the preparation of a Secondary Plan. The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by satisfactory technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.). In undertaking these comprehensive planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network).

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Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Town has received a Proposed Official Plan Amendment (File No. POPA 2021-0009) for the lands, which was circulated to the Region for review and comment. The Regional comment letter, attached, indicated that the application was premature and additional information was required. The Region has received a revised submission which is currently under review. Comments on the Proposed Official Plan Amendment will be sent under separate cover once the review is completed.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- The environmental limits on a site-specific basis have not been examined or substantiated through satisfactory detailed Environmental Studies, so the limits of the proposed EPA1-HDD zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been determined to be satisfactory, the limits of the EPA1-HDD zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

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Suite B
Brampton, ON
L6T 4B9
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Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1-HDD zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning has not been completed for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

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- The applicant is encouraged to explore the opportunity for co-locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery and Private Home Day Cares are not permitted uses within a Live-Work unit within the RMD-AAA-HDD, RMD-BBB-HDD and RMD-CCC-HDD zones. The Region would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-AAA-HDD and RMD-BBB-HDD zones which requires a minimum width of 6 metres for a private road/street or lane.
- In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is no paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law be added to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Secondary Plan is in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0009, by applying a Holding (“H”) symbol to each of the zones: RMD-AAA-HDD, RMD-BBB-HDD, RMD-CCC-HDD and EPA1-CCC-HDD.

While at first glance it may appear that the EPA1-CCC-HDD zone would not warrant an “H”, the limits of the EPA1-CCC-HDD zone may not reflect the boundaries of the environmental lands as explained in this letter.

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As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing specified in the Holding condition 2.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that the limits of the Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

Considering that the Secondary Plan and development applications are not yet satisfactory or approved, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision ensures that a Secondary Plan is completed. Recognizing that the planning authority will change as of July 1, 2024, the Region is not included as being a “satisfied” party in this condition.
- The second holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The third holding provision (comprised of subsections 3.a to 3.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The fourth holding provision (comprised of subsections 4.a to 4.f) speaks to the requirements for ensuring a successful transportation network, including Regional roads.
- The fifth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (6, 7, 8 and 9) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

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Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Zone Designation	Location	Conditions for Removal
RMD-AAA-HDD RMD-BBB-HDD RMD-CCC-HDD EPA1-HDD	Part of Lot 18 , Concessions 2 and 3 EHS (Chinguacousy)	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-AAA-HDD, RMD-BBB-HDD, RMD-CCC-HDD and EPA1-HDD, the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, together with the required supporting studies. 2. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure. 3. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. 4. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Transportation Study for the

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		<p>Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s);</p> <ul style="list-style-type: none"> b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; d. there is sufficient capacity on the Regional road network to service the lands; e. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, f. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>5. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>6. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>7. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been</p>
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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		<p>received and the recommendations of the assessment have been implemented through the development application.</p> <p>8. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There are a number of parking standards being amended (i.e. number of parking spaces required, parking space size, permitting encroachments into the parking spaces and allowing garbage/recycling bins to be located within required parking spaces). In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With these proposed reductions and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law includes no maximum building area and no minimum landscape area. There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.
- The subject lands are adjacent to Highway 410 and therefore the Town should be consulting with the Ministry of Transportation on this topic.
- Without the completion of Secondary Planning as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
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risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time, it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments. The Region has and will continue to provide more detailed comments on the proposed Official Plan Amendment application (File No. POPA 2021-0009).

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Town of Caledon

Agenda@caledon.ca

Bindu Shah, Town of Caledon

Tanjot Bal, Town of Caledon

Carmine Caruso, Town of Caledon

Adam Miller, Toronto and Region Conservation Authority

Dorothy DiBerto, Credit Valley Conservation

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Appendix I: Regional Comments POPA-2021-010 – Dated May 5, 2022

May 5, 2021

Sean Kenney, MCIP, RPP
Senior Planner
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
Sean.Kenney@caledon.ca

**Re: Snell's Hollow East Secondary Plan
Glen Schnarr and Associates Inc.
Snell's Hollow Developers Group
3728 Mayfield Road, 12097 Kennedy Road, 12141 Kennedy Road, 0 Heart Lake
Road, 0 Kennedy Road**

**Region File: OZ-21-010C
Town File: POPA 2021-0010**

Dear Sean Kenney,

The Region has received the first submission materials for the above-noted Local Official Plan Amendment (LOPA) for a privately initiated Secondary Plan referred to as Snell's Hollow East in the Town of Caledon. The community is contemplated to consist of a mixture of residential (low, medium and high density) totally 1,087 units, two parks, open space, stormwater management ponds and commercial uses along with an internal road network. The comments enclosed in this letter outline key Regional considerations which are meant to assist the Town align with strategic Regional planning initiatives and requirements.

Planning and Development

Amendment to the Official Plan

As per Section 17(3) of the *Planning Act*, Regional Council is the approval authority for the Official Plans of the local municipalities of the Region of Peel, including local official plan amendments. In accordance with Regional by-law 1-2000, Local Official Plan Amendments are generally exempt from Regional approval where they have had regard for applicable Provincial Plans, where the City Clerk has certified that processing was completed in accordance with the Planning Act and where the Region has advised that no Regional Official Plan Amendment is required to accommodate the local Official Plan Amendment.

Following our review of POPA-2021-0010, we can advise that the application has addressed the requirements for exemption from Regional Approval.

Notwithstanding this, Regional staff offer the following comments and requirements for a request of resubmission:

Planning Justification Report

We have reviewed the Planning Justification Report prepared by Glen Schnarr & Associates Inc dated August 2021 and have no general concerns with the analysis and conclusions therein as the appropriate Provincial and Regional policies for development have been identified. However, the applicant is to further provide consideration towards the Region's affordable housing targets detailed in the proceeding section below.

Affordable Housing

Region of Peel (ROP) Official Plan

To ensure that planning for Snell's Hollow is supported by a range of housing options, the secondary plan for this community should include a mix of housing form, density, tenure and affordability in alignment with the Region's Official Plan policies (Section 5.8) including the housing targets in table 4, and [Peel Housing Strategy](#). Public and non-profit sectors are important for helping achieve low-income affordable housing units while for-profit development help contribute to affordable housing targets – especially for moderate income households.

- Prior to adoption of the Secondary Plan, planning for the community must aim to implement the Region's housing targets through the development process.
- We request revised materials that demonstrate how the Regions housing targets can be met through detailed land use planning process. Consideration must be given to phasing, how the development will contribute to low- and moderate-income affordable housing need (including family sized units and consideration for Additional Residential Units (ARUs) within future designs) and how the secondary plan will provide housing choice through a range and mix of unit types, sizes, and tenure. An updated analysis or breakdown of affordable housing commitments for the secondary plan is requested.
 - Consideration should be given to providing a broader range of housing types (beyond low density housing types), to demonstrate a stronger contribution towards Peel-wide new housing unit targets on density and rental.
- The Peel 2051 Municipal Comprehensive Review (MCR) was recently adopted by Regional Council and contains new proposed housing policies (section 9). The applicant is encouraged to consider these policies when providing an updated analysis.

Town of Caledon Official Plan Review (Future Caledon)

- The Town of Caledon has developed an Affordable Housing Strategy which informs the Town's Official Plan and highlights the Town's role in supporting affordable housing. To further demonstrate alignment with housing objectives, the applicant should demonstrate how this proposed development aligns with the Affordable Housing Strategy.

Land Donation

- As part of the applicant's contribution to the Peel-wide housing target on affordability, the applicant may consider a contribution of land or units to the Region or a non-profit housing provider to be used for affordable housing. Regional staff would be interested in working with the applicant to establish the terms of such a contribution.

Human Services

- There is a potential need for co-location with a licensed childcare centre in the community. The applicant could explore this opportunity in one of the proposed mixed-use spaces. Please contact Paul Lewkowicz at paul.lewkowicz@peelregion.ca who can connect the applicant with staff in the Region of Peel's Human Services Early Years and Child Care Services Division.

Public Health

The Healthy Development Assessment reached a Silver threshold with a score of 75 percent. While this is encouraging, there are further opportunities to enhance the built environment. Please consider the following below:

Street Network:

- To promote physical activity, we encourage opportunities for active transportation through the creation of a permeable and well-connected pedestrian and cycling network. We encourage the inclusion of pedestrian connections from the street network to the NHS system.

Streetscape Characteristics:

- Consideration should be given to including sidewalks on both sides of the street which are a minimum of 1.8m in width. Please determine to see if this will be possible, even if it is only one side of the street, with the other sidewalk being 1.5m.
- Public outdoor areas such as pedestrian walkways, parks, and parking areas should include pedestrian- scaled lighting, shading and benches.
- For future consideration of the medium density and commercial developments, these buildings should be located linearly along major roads, with the main entrance facing the street. This will enhance the pedestrian environment.

Transportation Planning

Sustainable Transportation

Site Proximity of the residential and park space to the Highway 410:

The residential uses within the secondary plan are concentrated in close proximity to Highway 410. Although this is necessary to some extent help protect the natural heritage system towards Mayfield Road, this creates challenges to mitigate negative impacts of noise

and air pollution from the highway. There are a number of approaches the applicant can consider to improve their submission in this regard, such as providing a greater buffer between the residential units and the highway (potentially more than the MTO minimum), and making adjustments to the secondary plan layout and design to further mitigate noise and pollution impacts. The applicant should also consider other solutions such as landscaping and streetscape characteristics that will be provided to buffer the residential development and park space from the close proximity to the highway.

- Regional staff are looking to better understand what mitigation measures are planned to reduce the health impacts associated with the exposure to traffic emissions from the 410.
- The development plan will need to conform to Regional Official Plan policies 5.1.3.1 and 5.9.4.2.13 to prevent adverse effects from noise and other contaminants. In particular:
 - Noise: The Noise Feasibility Study recommends very high noise walls and berms to mitigate noise impacts from the Highway on the residences. Such noise walls are not generally helpful to create a high quality, pedestrian oriented streetscape and overall environment. The applicant will need to consider this as more detailed streetscaping plans proceed. Also, the report almost entirely focuses on noise impacts on residences, rather than the parcels of parkland, which are all directly adjacent to the highway. If the parkland is noisy, it will be less valuable and welcoming for future residents.
 - Air pollution: the Planning Justification Report only speaks to the air pollution impacts of the development itself, and not the potential health impacts on future residents who will be living in close proximity to the 410 in this design. This should be mentioned, considered, and examined in this report and through supplementary documents.

Active Transportation and Transportation Demand Management (TDM)

The applicant should consider additional opportunities to better encourage sustainable and active trips, and manage transportation demand:

- The current plan does not include any trails or pedestrian/cycling connections through the natural heritage system. The proponent should clarify whether these will be provided. Future residents should be provided a walking route that is as direct as possible from their homes to the Commercial area on Mayfield Road to make these services easily accessible, while still ensuring protection of the natural heritage system.
- Although the development scores fairly high overall through the Healthy Development Assessment, one area with lower scores is in Neighbourhood Community and Retail Services (i.e. standards 6, 7, 8) which are very important in order to encourage active travel by residents. The applicant may want to consider providing space for some services within the secondary plan area through additional land uses (small scale commercial, etc), to ensure basic community services are accessible to residents in this area without needing a car.

- The development scores low in the Efficient Parking category of the HDA, and the TDM measures within the Traffic Impact Study are very limited. The applicant should consider expanding their recommended TDM measures, including further exploring opportunities for shared parking spaces between user groups, providing specific spaces for carpooling or car share vehicles, and unbundling parking from some residential unit purchases. Regional staff also encourage limiting surface parking within the development and the addition of underground or on street parking where possible.
- Safe and secure short- and long-term bicycle parking should be provided within the various medium-high density and commercial blocks. The applicant should follow the directions in the Peel H.D.A. for minimum bicycle parking standards for multi-unit residential and retail/commercial uses.

2020 Focused Analysis Area

- A portion of the subject lands fall within the 2020 Focused Analysis Area Preferred Route for the Highway 413 and the Narrowed Area of Interest for the Northwest GTA Transmission Corridor. As such, the Secondary Plan application must be circulated to the Province for their review and clearance.
 - In particular, the subject lands fall within close proximity to the Highway 413-Highway 410 connection. As such, the secondary plan must ensure that this connection is protected in accordance with Regional Official Plan policy 5.9.12.2.3.

Traffic Development

Access and Study

- Prior to adoption of the Secondary Plan, a Traffic Impact Study (TIS) acceptable to the Region of Peel will be required detailing the effect of the proposed development on the adjacent Regional Road network and intersections and identifying any mitigation measures. Additional details are noted below:
 - Traffic signals are recommended at site access opposing Stonegate Drive on Mayfield Road.
 - Please note Peel Region can only support signalization when warranted. We request the application provide a signalization justification letter from the Traffic Consultant. Note Pedestrian/ Cyclist crossing signal can be considered separately from a full Traffic signalization.
- Minimum access spacing requirements of the Region's Road Characterization Study (RCS) must be considered along and in proximity to Mayfield Road. An emphasis of the RCS is to limit the number of accesses permitted onto the Regional Road network. This must be considered for the proposed commercial and medium-high density blocks fronting Mayfield Road.

Property Requirements

- Future property dedication requirements for Regional Road 14 (Mayfield Road) are noted in the table below:

		ROW	Measurement from centreline of Mayfield
	Mid-block	50 metres	25 metres
245 metres within intersection	Single-left turn intersection	55.5 metres	27.75 metres
245 metres within intersection	Dual left turn intersection	59 metres	29.5 metres

- 15m x 15m Daylight Triangles will be required at Regional Intersections including the intersections of Mayfield Road and Kennedy Road and Heart Lake Road;
- Confirmation is required to understand if the site access onto Mayfield Road will be a private site or municipal access. Daylight triangle requirement may also be applicable at the access on Mayfield Road.
- The gratuitous dedication of a 0.3 metre reserve along the frontage of the property along the Mayfield Road, except the approved access point.
- Future development applications will be required to provide a draft reference plan for our review and approval prior to the plans being deposited. All costs associated with preparation of plans and the transfer of the lands will be solely at the expense of the applicant.

Landscaping/Encroachments

- Landscaping, signs, fences, gateway features or any other encroachments are not permitted within the Region's easements and/or Right of Way limits.

Regional Roads - Capital

- The Region will have a requirement for a permanent access easement on the subject lands to allow pedestrian and vehicular access to the Region's sanitary sewer located in the Hwy 410 corridor on the south side of the highway east of Kennedy Road.

Development Engineering

Functional Servicing Report

A Functional Servicing Report dated February 2021 and prepared by Schaeffers Consulting Engineering was received. Following the review of the FSR and notwithstanding the proposal included an estimated population beyond the Region's forecasted growth for this area, no

water and wastewater capacity constraints or concerns were identified in servicing the proposal.

- Although the Region does not have any concerns to the feasibility for servicing the proposal, a resubmission of the FSR is required and the following information must be considered within the FSR to confirm flow calculations and assumptions made in the Regions models:

Water Review

- The fire flow requirement for this development should not be added up for each area (maximum fire flow should be considered as the fire flow requirement which is 416.7L/s).

Wastewater review

- There is a slight discrepancy in average persons per unit (ppu) used for singles/semi-detached and apartments to estimate the population compared to Region DC criteria, this results in underestimation of population. It is recommended to use the latest Region DC average persons per unit (ppu) criteria to estimate the population.
- Confirm / check wastewater flow calculations based on revised population.
- The proposed Region masterplan project (construction of a 1200-mm sanitary sewer on Kennedy Road from Mayfield Road to Christie Drive) and capital project (construction of a 375-mm sewer on Ecopark Close up to Heart Lake Road) should be completed prior to wastewater servicing for this development.
- The proposed sanitary sewer to connect to existing sewer at Heart Lake Road and Ecopark Road will be the benefiting developer's responsibility.

Stormwater Review

The Stormwater design for the secondary plan area is required to be in line with Region's storm criteria. Additional information for consideration and details for confirmation are noted below:

- There is an existing 525 mm crossing on Mayfield – this is Region owned. This is being proposed to be used for discharge from SWM pond 2.
 - Confirmation is required to understand if SWM Pong 2 will be owned by the Town.
 - Conformation is required to understand if a regional event is contemplated to also be conveyed via the 525 mm sewer, or whether there will be an overland spillway.
 - The region does support any overland flow from the SWM pond onto the regional road.
 - 100 y flow = 0.532 cms.

- Future Development stages will need to confirm drainage capacity of the 525mm sewer. The stormwater design is required to be in line with Region's storm criteria.
- Area 203 fronts Mayfield – onsite controls are proposed but confirmation is required to for capacity of Mayfield Rd ditches and sewers to convey outflow.
- Most of the sewers located on the south side of Mayfield along this stretch are already surcharged. As such, upsizing will be required.
- Mayfield Road is scheduled for widening in mid 2026. Discussions may be required regarding any cost implications to the Road widening project due to this proposal.

Environmental Considerations

Water Resource System and Natural Heritage System Policy Conformity:

According to the CESIMP, the subject property contains the Heart Lake Provincially Significant Wetland, an unnamed tributary of Spring Creek and a significant valleyland system. The Region of Peel Official Plan designates the Heart Lake PSW Wetland as a Core Area of the Greenlands System on Schedule A of the Region of Peel Official Plan. The TRCA is currently reviewing the CEISMP and providing technical comments to confirm there are no Regional policy concerns with the proposed development and supporting documents.

Completion of CEISMP Study Requirements

- Prior to adoption of the Secondary Plan, confirmation is required from the TRCA that the three-part CEISMP has been finalized and satisfies the requirements of the Terms of Reference approved by the Region, Town and TRCA. The review by the TRCA should ensure that recommendations of the CEISMP are being implemented in the Secondary Plan.

Conformity with the Regional Official Plan Greenlands System

- Prior to adoption of the Secondary Plan, confirmation is required from the TRCA that the proposed limits of the Environmental Policy Area (EPA) designation will provide for the protection of the Heart Lake Provincially Significant Wetland with appropriate buffers and provide for the appropriate protection, restoration and enhancement of the significant valleyland system within the Snell's Hollow Secondary Plan.

Hydrogeological Review

- The Hydrological Assessment prepared by R.J Burnside & Associated Ltd provides information from the review of the MECP WWRs database with a total of 81 well records identified within the 500 meters area. 30 identified as supply wells, 16 test wells, 12 monitoring wells and 22 abandoned wells.
 - The report is missing the door-to-door survey as well as a contingency plan for well complaints. The consultant will need to provide a door-to-door survey within the 500 meters area and invite residents to participate in the

monitoring program. A contingency plan for well complaints must also be included within the revised report.

Waste Development

- All townhouse units would be eligible to receive Region of Peel curbside cart-based waste collection of garbage, recycling, and organics provided that the requirements outlined in Sections 2.0 and 3.0 of the Waste Collection Design Standards Manual are met;
- All multi-residential and stacked townhouse units would be eligible to receive Region of Peel front-end waste collection of garbage and recycling provided that the requirements outlined in Section 2.0 and 4.0 of the waste collection design standards manual are met;
- Retail and Employment units will be required to receive private waste collection
- For more information, please consult the following:
 - The Waste Collection Design Standards Manual available at:
<https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf>

Heart Lake Road Landfill (7029)

- This property is within the vicinity of the Heart Lake Road landfill site. It is an inactive, private landfill located on the southwest corner of Mayfield Rd. and Heart Lake Rd. The exact boundaries are unknown. It was closed sometime in the 1950's. It is catalogued by the M.O.E as 7029. No further information is available.

Concluding Remarks

Regional staff look forward to working collaboratively with the Town of Caledon and applicant to advance the application. Regional staff are available to engage further in this process with the applicant to address detailed comments. Revised submission materials as noted above are required. Updated Regional comments will be provided when the requested revised materials are received.

If there are any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4093 or by email at patrick.amaral@peelregion.ca

Yours truly,



Patrick Amaral MES (PI)
Principal Planner
Planning and Development Services, Region of Peel

CC: Christina Marzo, Manager, Region of Peel

April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Between Centreville Creek Road and The Gore Road, Between Mayfield
Road and Healey Road, Town of Caledon
Town File Number: RZ 2024-0005C (Area A11)
Region File Number: RZ 24-005C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between Centreville Creek Road and The Gore Road, between Mayfield Road and Healey Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1), Rural Residential (RR) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.) and a Growth Management and Phasing Plan being supported by Council. While some infrastructure exists in the area, without understanding the planned density, there may be a lack of infrastructure (i.e. an adequate transportation/transit network, etc.) being available to the service the development. In undertaking these planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, should

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L6T 4B9
tel: 905-791-7800

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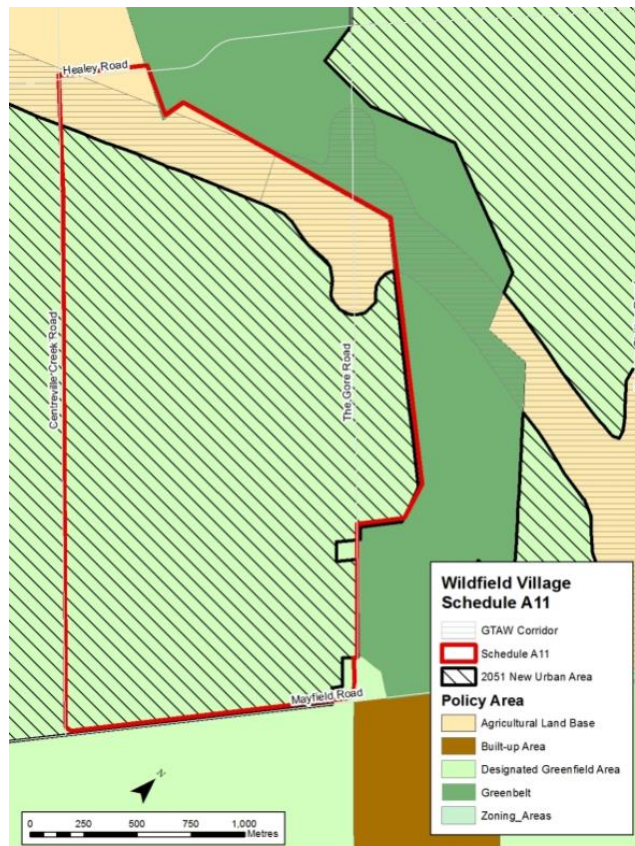
additional infrastructure improvements be required, further discussions on the financing of those services is also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Rural System – Lands Outside of the 2051 New Urban Area

The proposed Zoning By-law Amendment proposes to rezone lands outside of the 2051 New Urban Area, within the Rural System, for urban (residential) land uses – see image below.



In accordance with the current, in effect, Planning legislation, a municipal comprehensive review (a Regional Official Plan Amendment) is required to expand the Urban System prior to the lands being rezoned. The proposed Zoning By-law Amendment does not conform to the Regional Official Plan.

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2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is designated for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 331 net hectares which results in 7% of all lands within the 2051 New Urban Area and 11% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment (as circulated by the Town) will not conform to the Region of Peel Official Plan* however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and

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Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory and reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment, Wildfield, is included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure mater plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

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Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, with the exception of this application. The Region has been involved in a pre-consultation process for proposed applications; however, we understand that a formal application(s) has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following be included in the By-law:

- Prior to the approval of the Zoning By-law, the area to be rezoned shall be amended to be entirely within the 2051 New Urban Area limits.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA1 zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1 zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1 zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density

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tel: 905-791-7800

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of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use. The definition is missing from the RMD-X3 zone.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

The Region would also encourage permitting a Multiplex as a use with the appropriate standards in the RMD-X2 zone. This same zone permits townhouses and apartment buildings.

- The applicant is encouraged to explore the opportunity for locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery is not a permitted use within the RMD-X1 and RMD-X2 zones. In addition, a Private Home Day Care is not permitted within the RMD-X2 zone. The Region would encourage the Town to consider adding these uses.

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- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-X2 and RMD-X3 zones which requires a minimum width of 6 metres for a private road/street or lane.
- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.

With respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

- Paragraph 3 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 3) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (H) provisions be applied to the entirety of the lands subject to RZ 2024-005, by applying a Holding to each of the zones: RMD-X1-H-XX, RMD-X2-H-XX, RMD-X3-H-XX and EPA1-H-XX.

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While at first glance it may appear that the EPA1-H-XX zone would not warrant an “H”, the limits of the EPA1-H-XX zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 4.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.

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- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-X1-H-XX RMD-X2-H-XX RMD-X3-H-XX EPA1-H-XX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-X1-H-XX, RMD-X2-H-XX, RMD-X3-H-XX and EPA1-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy

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		<p>5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and,</p> <p>f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p>
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		<ul style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
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		<p>Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s);</p> <ul style="list-style-type: none"> b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands</p>
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		<p>(including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There appears to be zone provisions which would restrict the parking of motor vehicles in the driveway of dwellings located within the RMD-X2 zone. In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With the proposed restriction and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads

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unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.

- The proposed By-law schedule shows that portions of the GTA West Corridor are to be rezoned. Planning legislation requires that transportation corridors be protected. The correct corridor width and location should be validated by the Ministry of Transportation. The Region is aware of comments from the Ministry of Transportation in the past for similar circumstances which would not be in support of rezoning the lands. The Town should be consulting with the Ministry of Transportation on this topic.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

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Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Municipal Clerk
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Along Regional Road 50 from Columbia Way to North of Emil Kolb Parkway
and North-East Corner of Mount Hope Road and Columbia Way, Town of Caledon
Town File Number: RZ 2024-0010C (Area A3)
Region File Number: RZ 24-010C
Related File Number: POPA 2022-0001**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands along Regional Road 50 from Columbia Way to north of Emil Kolb Parkway and the north-east corner of Mount Hope Road and Columbia Way. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1, A1-349, A1-370 and A1-371), Commercial (C-577) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.) and a Growth Management and Phasing Plan being supported by Council. While some infrastructure is planned for the area, without understanding the planned density, there may be a lack of infrastructure (i.e. an adequate transportation/transit network, etc.) being available to the service the development. In undertaking these planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services,

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matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, should additional infrastructure improvements be required, further discussions on the financing of those services is also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the majority of the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is designated for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 134 net hectares which results in 3% of all lands within the 2051 New Urban Area and 4% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has received notice of a proposed Secondary Plan application which includes the required supporting material; however, it has not yet been determined to be satisfactory. The requirements of the 2051 New Urban Area policies have not been satisfied.

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The proposed Zoning By-law Amendment (as circulated by the Town) will not conform to the Region of Peel Official Plan* however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Bolton Residential Expansion Settlement Area

A portion of the lands (east side of Regional Road 50, north of Columbia Way) are identified in the Region of Peel Official Plan* as Bolton Residential Expansion Settlement Area. Similar to the 2051 New Urban Area, the Bolton Residential Expansion Settlement Area policies require a number of items to be satisfied prior to the Town adopting an official plan amendment or secondary plan amendment. The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The requirements of these policies have not been satisfied.

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory and reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this

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proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment is not included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Town has received a Proposed Official Plan Amendment (File No. POPA 2022-0001) for the lands, which was circulated to the Region for review and comment. The Regional comment letter, attached, indicated that the application was premature and additional information was required.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following be included in the By-law:

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- The lands subject to this Zoning By-law Amendment are also subject to another proposed Strong Mayor Power Zoning By-law Amendment for Area 12 (Columbia Square). The by-laws should be amended accordingly so there is no conflict.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed residential zones cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1 zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

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While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use. The permitted use is missing from the RM-XXX zone and Non-Market Housing is not included in the R2-XXX zone.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

Regional staff also note that many of the other Strong Mayor By-laws being brought forward include Multiplex as a permitted use; however, this is not being considered in either zone within this By-law. The Town is encouraged to consider adding this use.

- The applicant is encouraged to explore the opportunity for locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery is not permitted on the ground floor of a mixed-use building within the RM-XXX zone. The Region would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the R2-XXX and RM-XXX zones which requires a minimum width of 6 metres for a private road/street or lane.
- The first “AND WHEREAS” clause requires a legal description be inserted.
- In Paragraph 2 of the By-law, the zones referenced (being the current zoning) is incorrect and should be revised. Also, all of the zones referenced (being the proposed changes) should be listed in full with the holding provisions – not all zones are currently captured.

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- In Paragraph 3a, with respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?
- Paragraph 4 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 4) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (H) provisions be applied to the entirety of the lands subject to RZ 2024-010, by applying a Holding to each of the zones: R2-XXX-H-XX and RM-XXX-H-XX.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 3.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.

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- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

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Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RM2-XXX-H-XX RM-XXX-H-XX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> R2-XXX-H-XX and RM-XXX-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1,

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		<p>2024);</p> <ul style="list-style-type: none"> e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p> <ul style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required</p>
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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
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		<p>financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the
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L6T 4B9
tel: 905-791-7800

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		<p>Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been</p>
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L6T 4B9
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		<p>received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There does not appear to be parking rates established for Non-Market Housing or Multiplex. With the proposed silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law includes no maximum building area and minimum landscape area (10% of the front yard). There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

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Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments. The Region has and will continue to provide more detailed comments on the proposed Official Plan Amendment application (File No. POPA 2022-0001).

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

c.: Kevin Klingenburg, Municipal Clerk
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

Appendix I: Regional Comments POPA 2022-0001 dated June 2, 2023

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Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

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June 2, 2023

Carmine Caruso, MCIP, RPP
Senior Planner, Development and Design
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
carmine.caruso@caledon.ca

**RE: Official Plan Amendment for Bolton North Hill Secondary Plan
0, 14289, 14291, 14337, 14442, 14475, 14530, 14600, 14616, 14684, 14685,
14687, 14700, 14766 Highway 50, 0, 14674, 14691 Duffys Lane, and 0
Mount Hope Road.
Bousfields Inc. on Behalf of Bolton North Hill Landowners Group
Town File Number: POPA-2022-0001 / Region File Number: OZ-22-001C**

Dear Carmine,

The Region has received the above-noted application that proposes an Official Plan Amendment for a privately-initiated Secondary Plan identified as the Bolton North Hill Secondary Plan (also referred to as the Hybrid Option 1/2 lands) inclusive of approximately 178 hectares in the vicinity of Highway 50 and Emil Kolb Parkway. The proposal coincides in part with the settlement area added through the Local Planning Appeal Tribunal (LPAT) approved Regional Official Plan Amendment 30 (ROPA 30) settlement area. The application proposes to re-designate the lands in the Town of Caledon Official Plan from Prime Agricultural Area and Environmental Policy Area to permit a range of residential, commercial, institutional, open space/woodlot, park and stormwater pond land-uses. The proposal further contemplates approximately 4,136 new residential units comprised of single dwellings, townhouses, and medium to high density apartment buildings. As per the 2051 Region of Peel Official Plan (2051 RPOP), the current proposed Secondary Plan area includes lands identified within the 2051 New Urban Area and the Bolton Residential Expansion Settlement (BRES) Area.

Planning and Development

2051 Region of Peel Official Plan

The Bolton North Hill Secondary Plan lands are identified within the Urban System and Designated Greenfield Area in the Peel Region Official Plan. The policies of the Peel Region Official Plan and, in particular, section 5.6.20 Designated Greenfield Areas apply to the review of the Secondary Plan. As noted, portions of the Secondary Plan are also identified within the 2051 New Urban Area subject to policies in Section 5.6.20.14 and the Bolton Residential Expansion Settlement Area subject to policies in

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Suite A
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tel: 905-791-7800

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Section 5.6.20.14.22. A fulsome assessment is required to demonstrate how the proposed application satisfies the policies and contributes to the overall objectives of the Region of Peel Official Plan. Region staff look forward to working with the applicant and the Town of Caledon to address matters that are required prior to approving secondary plans including, but not limited to the need for secondary plan areas, a Staging and Sequencing Plan, the structure of a connected transportation system, servicing related matters within the 2051 New Urban Area and the BRES Area and other technical studies required by the Region and Town including those identified below:

- A Staging and Sequencing Plan;
- Structure of a connected transportation system;
- A detailed Subwatershed study or equivalent study;
- A Community Energy and Emissions Reduction Plan;
- A Climate Change Adaption Plan;
- An Agricultural Impact Assessment; and
- A Housing Assessment;

The applicant is further encouraged to work with the Town of Caledon on the Town's Phasing Strategy which aims to identify priority of development within the 2051 New Urban Area.

A Staging and Sequencing Plan

Approval of secondary plans by the Town within the 2051 New Urban Area are to proceed only in accordance with staging and sequencing plans to the satisfaction of the Region. The staging and sequencing plan must ensure orderly, fiscally responsible and efficient progression of development that is coordinated with the Region's Capital Plan, Peel Water and Wastewater Master Plan, and Transportation Master Plans.

- The proposal includes infrastructure that is not included in current Water/Wastewater and Transportation Master Plans. Updates will be required to the master plans to reflect the forecasts in the Regional of Peel Official Plan, this work will further include, in collaboration with local municipalities, the determining of any opportunities to provide and advance infrastructure that would accelerate growth sooner. Any new planned infrastructure will require council direction and approval.

Structure of a connected transportation System

Regional Official Plan policy 5.6.20.14.12 requires the town to permit approval of secondary plans within the 2051 New Urban Area only after the structure of a connected transportation system is planned to the Region's satisfaction. This includes a conceptual alignment of a transit system for an East-West high order transit corridor.

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tel: 905-791-7800

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A Detailed Subwatershed Study or Equivalent Study

In accordance with Region Official Plan policy 5.6.20.14.17 f), a detailed subwatershed study or an equivalent study is required prior to endorsing land uses for the secondary plan and prior to the adoption of the official plan amendment to implement the secondary plan. The policies require: (1) terms of reference to be prepared to the satisfaction of the Region in consultation with the conservation authorities and relevant agencies; and (2) confirmation that the subwatershed study or equivalent study addresses the direction, targets, criteria and recommendations of broader scale or scoped subwatershed studies applicable to the 2051 New Urban Area. Regional staff further provide the following comments:

- The current studies submitted with the proposal do not address policy requirements. The study is required to further implement the direction, targets, criteria and recommendations of the Region's Scoped Subwatershed Study (Wood, 2022).
- The Region completed a Scoped Subwatershed Study as part of the Peel 2051 Regional Official Plan Review's Settlement Area Boundary Expansion Study. The Scoped Subwatershed Study provides natural heritage and water resource system management recommendations, direction, criteria and guidance to address how settlement expansion will be planned to avoid, minimize, and mitigate potential negative impacts.
- The Scoped Subwatershed Study provides specific recommendations, direction, criteria and guidance addressing water management and natural heritage system targets to be implemented within Main Humber River Subwatershed.
- The Subwatershed Study and Secondary Plan will need to address how the natural heritage system recommendations and targets of the Scoped Subwatershed Study are addressed and implemented through the development of the Secondary Plan.
- Recommended terms of reference for the preparation of detailed subwatershed studies to support secondary planning are provided in the Scoped Subwatershed Study (See Part B Report: Appendix F). A copy of the study report is available on the Peel 2051 Regional Official Plan Review project website - <https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp>.

Agricultural Impact Assessment (AIA)

- The AIA submitted by Orion Environmental Solutions, dated February 16, 2022, does not address policy requirements as outlines in Peel Region Official Plan policies 5.6.20.14.17 a) i) to iv) and 5.6.20.14.22.1 m).

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- The AIA and Secondary Plan will need to identify and map Minimum Distance Separation (MDS I) setbacks in accordance with OMAFRA's minimum distance separation formulae and identify and implement appropriate mitigation in the Secondary Plan area to minimize impacts to adjacent agricultural operations that are located outside the Secondary Plan in the Greenbelt Plan Area.
- In the absence of a terms of reference provided by the Town it is recommended that OMAFRA's draft Agricultural Impact Assessment (AIA) Guidance Document be the reference guide for preparation of the AIA.

Community Energy and Emission Reduction Plan and Climate Change Adaption Plan

The Community Energy and Emissions Reduction Plan (CEERP) and Climate Change Adaption Plan (CCAP) are new study requirements for each secondary plan area to address Peel Region official Plan policies 5.6.20.14.17d i) to v) and 5.6.20.14.17 e) i) to ii) and will require terms of reference to be prepared to the satisfaction of the Town.

- No CEERP or CCAP has been submitted
- A terms of reference has been drafted and shared with the Town. It can be provided as a reference guide for the preparation of the two studies.

Housing Assessment

Prior to adopting an official plan amendment and secondary plan the in 2051 New Urban Area and BRES Area, a Housing Assessment will be required and be consistent with local and Regional housing objectives and policies to demonstrate contributions towards Peel-wide new housing unit targets shown in [Table 4](#) of the 2051 Region of Peel Official Plan. Additional considerations are noted below:

- For apartment units, the applicant is encouraged to include an appropriate proportion of family-sized (two and three or more bedroom) unit types, including units of all sizes that are affordable to moderate income households. The applicant is further encouraged to provide units at prices that are affordable to low- or moderate-income households. The definition of 'affordable housing' can be found in the [Glossary section](#) of the new Official Plan.
- As part of the applicant's contribution to the Peel-wide new housing unit target for affordability, the applicant may consider a contribution of units to the Region and/or a non-profit housing provider to be used for affordable housing. Regional staff would be interested in working with the applicant to establish terms of such a contribution involving the Region of Peel and/or connecting the applicant with a non-profit housing provider.
- The applicant is encouraged to review opportunities to incorporate purpose-built rental apartment units, where possible, or affordable condo rentals. The applicant should explore all available funding sources to support affordable rental housing, such as the [Canadian Mortgage and Housing Corporation](#)

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[Rental Construction Financing Initiative](#) and [Canada Mortgage and Housing Corporation Affordable Housing Innovation Fund](#).

- Consider opportunities for rental, such as purpose-built rental apartment units and/or by incorporating additional residential units (ARUs). This could include ARUs in a certain number of detached, semi-detached homes and townhouses or having the option of ARU rough ins, larger basement windows, fire and safety requirements, and providing separate entrances as part of pre-construction sales.

Secondary Plan Draft OPA

- The Secondary Plan's policies for the natural environment and water management do not reference the requirement that development of the Secondary Plan is subject to the recommendations and direction of a detailed subwatershed study, or equivalent study. Including 2051 RPOP Policy 5.6.20.12 that requires the local municipalities to require community or neighbourhood block plans to implement the policies of any new secondary plan and the recommendations of subwatershed studies on a sub-area basis in order to coordinate the overall delivery of services and infrastructure staging and sequencing, including the layout/function of open space corridors, and natural heritage system features, linkages and areas.
- The relationship of the Functional Servicing, Stormwater Management and Natural Heritage Study Reports to the detailed subwatershed study and implementing block planning studies and reports is unclear and should be revised or clarified in accordance with policy requirements.

Development Engineering

The proposal includes infrastructure that is not included in current Water/Wastewater Master Plans. Updates will be required to the master plan to reflect the forecasts in the Regional of Peel Official Plan, this work will further include, in collaboration with local municipalities, the identification of any opportunities to provide and advance infrastructure that would accelerate growth sooner. Any new planned infrastructure will require council direction and approval. Further comments are noted below:

- No water and sanitary infrastructure exists in this area to service the proposed Secondary Plan Area. The Region has initiated a Class Environmental Assessment (EA) in Bolton to address and identify the infrastructure projects required to service the ROPA 30 lands. The projects follow the schedule C Municipal Class EA process and the EA is anticipated to be completed by the fall of 2024. The Bolton Class EA will determine the servicing strategies for these lands.

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10 Peel Centre Dr.
Suite A
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Functional Servicing Report

- The total amount of units proposed in the introduction section of the FSR is 4562, whereas the concept plan indicates a total unit count of 4136. Further, there is a discrepancy in the total population when compared against the water demand calculations. The Sanitary calculations indicate a total Option 1 + Option 2 population of 12,536 persons, compared to 12,882 persons under the water demand calculations.
- It is encouraged that the applicant uses updated PPU figures from the 2020 Region of Peel DC study where possible to determine populations.
- The sanitary sewer will need to be upgraded/twinning, extended, and new sanitary pumping stations and forcemains are required.
- The sanitary drainage plans in future submissions must indicate drainage areas, drawing C-709 was not included which should highlight these drainage areas.
- Based on the provided information in the FSR, the estimated PWWF of the combined Option 1 and 2 lands should be 169.4 L/s, inclusive of 47.2 L/s or I/I flow.
- The full build out to the 2051 ultimate conditions for these lands will require a new pressure zone 7, new water pumping station, storage facilities and watermain network.
- Collective fire flow is estimated to be 220 L/s as per the Bolton Residential Expansion Study Infrastructure Report (GM Blueplan, June 16, 2014). Given this, the total ultimate 2051 condition population for Option 1 and 2 lands (residential + Jobs) is 12, 882 persons, and the estimated minimum required fire flow demand (FF+MDD) is 288.5 L/s for Option 1 lands, and 223.9 L/s for Option 2 lands. Flow and duration requirements will increase from this minimum if the service population increases.

Stormwater

- SWM pond 208 and 210 should be relocated to avoid an outlet towards Highway 50. If this is not feasible, demonstrate why, and design SWM for these catchments according to Peel's Stormwater Design criteria and MECP's latest CLI ECA stormwater criteria for new developments. If quantity control is not required for these catchments draining to Hwy 50, the Region requires LID infiltration and filtration should be used for quality and erosion control instead of wet ponds.

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tel: 905-791-7800

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Hydrogeological Review

- The Hydrological Assessment prepared by Crozier and Associates dated April 4, 2022 provides information from the review of the MECP WWRs database with a total of 206 well records identified within the 500 meters area. 153 identified as supply wells, 2 public wells, and the rest either monitoring wells, decommissioned or unknown wells.
 - The report is missing the door-to-door survey, dewatering calculations, a discharge plan, as well as a contingency plan for well complaints. The consultant will need to provide a door-to-door survey within the 500 meters area and invite residents to participate in the monitoring program. A contingency plan for well complaints must also be included within the revised report.

Transportation and Traffic Development

- The concept plan shows an extension of the Emil Kolb Parkway to the west. The Region has no plans for this extension and further discussions is necessary to confirm that this would be a Town road.
- There are two Regional Roads within the planning area – Regional road 50 (Highway 50) and Regional Road 150 (Emil Kolb Parkway)

Land dedication

Land dedication requirements along Regional roads are as follows:

	Right-of-way (meters)	
	Highway 50	Emil Kolb Parkway
Mid-block	36	45
245 meters within a single left-turn lane intersection	41.5	50.5
245 meters within a dual left-turn lane intersection	45	54

- Please note, a revised Traffic Impact Study (TIS) will be required to further determine the required intersection layout to support the development. The detailed land dedication requirement will be confirmed through review of the TIS.

Access Spacing requirements

Minimum spacing requirements between proposed new intersection/access

	Minimum Spacing (meters)	
	Highway 50	Emil Kolb Parkway
	Suburban connector	Industrial Connector
Full move	300	450
Left-in, right-in/right-out	150	225
Right-in/right-out	75	100

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tel: 905-791-7800

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- An updated detailed concept plan which includes proposed spacing measurements of any new roadways connections is to be provided for our review and comment;
- Please ensure any proposed new road connections on to Regional Roads meet the minimum spacing requirements noted within the Region's Road Characterization Study (as per the above table);
- Please note due to the limited frontage available to the proposed commercial block located at the NW corner of Highway 50 and Emil Kolb Parkway, access will only be considered as restricted.
- Please note due to the limited frontage available to the proposed high density residential block located at the SW corner of Highway 50 and Emil Kolb Parkway, access will only be considered as restricted.

Traffic Impact Study

- The provided TIS dated December 2021 contains outdated information and count data. Further conducting an analysis beyond 2031 is preferred since full build-out of the development may not be completed by 2031. Current studies are required to be completed and used within the revised TIS. With regards to any proposed Traffic Signals at intersections it is to be noted that traffic signal on Regional Road can only be supported when meets the signal warrants. The revised Traffic Impact Study should include signal warrants analysis at the proposed signal locations.
- Further, the travel patterns in the report do not take into consideration major road improvements, such as the Highway 427 extension to Major Mackenzie. This extension to the 400-series highway may have a significant impact on the existing travel patterns observed in the study area (i.e., more vehicles travelling SB through the Downtown Bolton, area along Highway 50).

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tel: 905-791-7800

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- The report notes that a growth rate of 2%, compounded annually, was applied to all movements on the boundary road network under the 2017 existing conditions. This value is a bit larger than what the Region is currently forecasting for this area, and may overestimate the increase in the number of background trips between 2017 and 2031.
- The need and justification is unclear for major road widening on Hwy 50 from Bolton Heights Dr to north of King St in the southbound direction.
- Some of the future improvements that are listed in the Transportation Assessment may not be feasible in the context of recently approved recommendations, or recently initiated projects on Queen St through downtown Bolton:
 - Parking restriction on Hwy 50, north of King St, may not be feasible in the context of recently approved recommendations from Peel's Parking Pilot for all-day on street parking in downtown Bolton.
 - Signal timing adjustments at Hwy 50/King St and an exclusive right-turn lane at Hwy 50/Columbia Way may not align with future recommendations of Peel's Queen St (Hwy 50) Complete Corridor Study and Preliminary Design.

Regional Municipal Class EA

- The Region of Peel has initiated a 'Complete Corridor Study and Preliminary Design' Schedule A+ Municipal Class Environmental Assessment Study for improvements to Queen Street (Highway 50) from Queensgate Boulevard to Columbia Way in the Village of Bolton. Coordination between the proposal and the EA will be required. For any questions regarding the project, please contact the Project Manager Sonya Bubas at sonya.bubas@peelregion.ca.

Healthy Communities

- An outdated version of the Healthy Development Assessment (HAD) was submitted for review of this application. Please note moving forward on future resubmission the most recent version of the HDA will need to be utilized and can be found here:
 - [Development applications resources - Region of Peel \(peelregion.ca\)](#)
 - <https://peelregion.ca/healthy-communities/#res>
- While the Healthy Development Assessment reached a passing score, there are further opportunities to enhance the built environment. Please consider the following below:

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tel: 905-791-7800

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- Please label sidewalks on both sides of the road. Best practices and recommendations shared within the Healthy Development Index suggests that the presence and extent of sidewalks on both sides of the street encourages walking and non motorized forms of travel. While sidewalks can encourage physical activity, if a sidewalk is in poor condition or inaccessible, it is shown to act as a barrier to walking, especially for seniors.
- For any block sizes that exceed 80 by 180m in size, regional staff encourage the addition of pedestrian walkways to further provide connectivity in the community. Further, explore consideration for physically separated bicycle lanes on the arterial roads.
- Neighbourhood and public retail services should be located linearly along major roads, with the main entrance facing the street. This will enhance the pedestrian environment.

Waste Development

- All townhouse units would be eligible to receive Region of Peel curbside cart-based waste collection of garbage, recycling, and organics provided that the requirements outlined in Sections 2.0 and 3.0 of the Waste Collection Design Standards Manual are met;
- All multi-residential and stacked townhouse units would be eligible to receive Region of Peel front-end waste collection of garbage and recycling provided that the requirements outlined in Section 2.0 and 4.0 of the waste collection design standards manual are met;
- Retail and Employment units will be required to receive private waste collection
- For more information, please consult the following:
 - The Waste Collection Design Standards Manual available at: <https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf>

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4093, or by email at: patrick.amaral@peelregion.ca

Yours truly,



Patrick Amaral MES (PI)
Principal Planner
Development Services, Region of Peel

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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WITHOUT PREJUDICE

April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Between The Gore Road to Humber Station Road, North of King Street, as
well as the East Side of Humber Station Road, North of King Street, Town of
Caledon
Town File Number: RZ 2024-0012C (Area A6)
Region File Number: RZ 24-012C
Related File Number: O.Reg 171/21 and POPA 2021-0002**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between The Gore Road and Humber Station Road, north of King Street, as well as the east side of Humber Station Road, north of King Street. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1) and various zones in O.Reg 121/21 to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Development Application Status

The Town has received Proposed Official Plan Amendment (File No. POPA 2021-0002) application for the lands which was circulated to the Region for review and comment. The application was appealed by the landowner. The parties involved in the appeal have continued to work on progressing the application on a Confidential and Without Prejudice basis. The most recent Regional comment letter would have been provided on that basis. As such, we have attached the most recent Regional comment letter which was submitted prior to the appeal being received. Regional interests on the application have not been addressed.

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Comments Are Provided on a Without Prejudice Basis

The comments contained herein also relate to lands that are subject to the Ontario Land Appeal Case No. OLT-23-000303 and OLT-23-001127, and are provided on a without prejudice basis.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.) and a Growth Management and Phasing Plan being supported by Council. While some infrastructure is planned for the area, without understanding the planned density, there may be a lack of infrastructure (i.e. an adequate transportation/transit network, etc.) being available to the service the development. In undertaking these planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, should additional infrastructure improvements be required, further discussions on the financing of those services is also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, a large of the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is designated for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 102 net

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hectares which results in 2% of all lands within the 2051 New Urban Area and 3% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has received notice of a proposed Secondary Plan application which includes the required supporting material; however, it has not yet been determined to be satisfactory. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment (as circulated by the Town) will not conform to the Region of Peel Official Plan* however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Bolton Residential Expansion Settlement Area

A portion of the lands (east and west side of Humber Station Road) are identified in the Region of Peel Official Plan* as Bolton Residential Expansion Settlement Area. Similar to the 2051 New Urban Area, the Bolton Residential Expansion Settlement Area policies require a number of items to be satisfied prior to the Town adopting an official plan amendment or secondary plan amendment. The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The requirements of these policies have not been satisfied.

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Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory and reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment are included in these priority areas. Although it is early in discussions, the Region is working with the Town and developers to advance the required works for this area. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

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The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

Housing Pledge

Based on previous conversations with the Town, the Region understands that a portion of these lands have been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Specific Comments on the Proposed Zoning By-law

Request for Zoning Standards

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following be included in the By-law:

- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed residential zones cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1-405-HDD zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1-405-HDD zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with the Region of Peel Official Plan*, there is a Primary Major Transit Station Area planned for this area. The MTSA lands are identified as being on the east and west side of Humber Station Road, north of King Street, and also the south-west corner of King Street and Humber Station Road. This area shall be designed to meet or exceed a minimum density of 150 residents and jobs combined per hectare. The Region encourages the Town to include a standard which reflects the minimum density target for the area.

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A portion of this proposed Zoning By-law Amendment will rezone a portion of the lands which are subject to a Ministerial Zoning Order (O. Reg. 171/21). There are uses within the MZO which are not reflected in the proposed Zoning By-law Amendment, such as a High Occupancy Vehicle Facility and Motor Vehicle Rental Establishment. A high occupancy vehicle facility means land used to support and service a public transit facility, including for dispatching, storing, servicing, hiring, loading or unloading buses, taxis, rideshare vehicles, limousine vehicles or similar fleet vehicles, but not tow trucks, tractors, trailers or tractor-trailers. This use is directly related to a potential GO Station. The proposed By-law may limit the use of the lands on the east side of Humber Station Road as it relates to a potential GO Station. In addition, a portion of the MZO identified a minimum density for the lands, which is proposed to be removed from the proposed Zoning By-law Amendment. Without the completion of comprehensive planning, Regional staff are concerned that the density to support a future transit station may be compromised.

In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area (outside of the MTSA) shall be designed to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard which reflects the minimum density target for the area.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.

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- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.
- The applicant is encouraged to explore the opportunity for locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery and Private Home Day Care not permitted in a live-work unit. The Region would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the R2-XXX and RM-XXX zones which requires a minimum width of 6 metres for a private road/street or lane.
- Paragraph 2 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 2) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

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- In Paragraph 3a, with respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?
- In Paragraph 4 of the By-law, the zones referenced (being the current zoning) is incorrect and should be revised. Also, all of the zones referenced (being the proposed changes) should be listed in full with the holding provisions – not all zones are currently captured.

Request for Holding Provisions

The Region is requesting Holding (H) provisions be applied to the entirety of the lands subject to RZ 2024-0012, by apply a Holding to each of the zones: RMD-AAA-HDD and EPA1-405-HDD .

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.
- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.

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- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-AAA-HDD EPA1-405-HDD	Part of Lots 11 and 12, Concession 4 (Albion)	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-AAA-HDD and EPA1-405-HDD, the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon

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		<p>Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and, f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024). <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p> <ul style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following</p>
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		<p>documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic
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		<p>Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <ul style="list-style-type: none"> d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application about or</p>
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		<p>are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There are a number of parking standards being amended (i.e. number of parking spaces required, parking space size, permitting encroachments into the parking spaces). With these proposed reductions together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system. .
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law includes no maximum building area or minimum landscape area. There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.

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- The subject lands are located in close proximity to existing industrial activity. There are considerations the Town should make as conflicts between these uses may exist. Have the D-6 Compatibility Guidelines been addressed? These guidelines assist land use planning authorities on how to decide what types of land uses are appropriate near industrial uses. This may impact the functionality, setbacks, etc. of the industrial and/or residential land uses.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time, it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments. The Region has and will continue to provide more detailed comments on the proposed Official Plan Amendment application (File No. POPA 2021-0002) on a without prejudice basis.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

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Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Municipal Clerk
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

Appendix I: Regional Comments POPA 2021-0002 dated June 28, 2021 and December 23, 2021

June 28, 2021

Stephanie McVittie
Acting Manager of Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
Stephanie.McVittie@caledon.ca

Re: Macville Secondary Plan
Region File: OZ-21-002C
Town File: POPA 2021-0002
Glen Schnarr and Associates Inc.
Bolton Option 3 Landowners Group

Dear Stephanie,

The Region has received the materials for the above noted application for a Local Official Plan Amendment (LOPA). The proposed development coincides in part with the settlement area added through the Local Planning Appeal Tribunal (LPAT) approved Regional Official Plan Amendment 30 (ROPA 30) settlement area. However, the proposed development captures a planning area larger than that approved in ROPA 30 which has been designated to accommodate growth to 2031 in Bolton. The portion outside of the settlement area is premature to consider as part of this application at this time. The subject lands are not currently within the Regional Urban Boundary or within an existing Rural Service Centre, and therefore the application as it stands does not conform to the Regional Official Plan.

The Region is currently undertaking a Settlement Area Boundary Expansion (SABE) Study as part of the Municipal Comprehensive Review (MCR), including the preparation of the technical studies required by the Growth Plan for the Greater Golden Horseshoe (Growth Plan), to support the selection of settlement boundary expansion areas for both residential and employment land to accommodate growth to 2051. While we do note that the area outside ROPA 30 is included in the draft conceptual settlement boundary expansion area currently being evaluated through the Region's MCR, these areas are conceptual only and updated policies will also be included in the Regional Official Plan that will guide future planning undertaken by Caledon including delineation of secondary plan areas, the need to undertake more detailed technical studies and will also include requirements related to staging and sequencing of growth. Further information on the status of the Region's Official Plan Review is available at the following link: <http://www.peelregion.ca/officialplan/review/>

Provincial and Regional Conformity

The Planning Justification Report speaks to Provincial and Regional policy conformity. However, the reference of the 2018 Regional Official Plan Office Consolidation does not include the recent ROPA 30. The Planning Justification Report and supporting materials should specifically speak to recently approved/ in-effect policies, such as ROPA 30 and how the proposed plan addresses all matters in Regional Official Plan policies and amendments.

Phasing and Implementation

The Town of Caledon is developing a planning framework (which may be referred to as the "Local Bolton Planning Framework").

Consistent with ROPA 30 policy 5.4.3.2.9.1, the Town of Caledon is required to prepare a phasing plan that provides for the orderly and fiscally responsible and efficient progression of development that is coordinated with the Region's capital plan and infrastructure master plans. The phasing plan should focus on the component of the Macville Secondary Plan lands that are located within ROPA 30. It

would be acceptable for landowners to prepare the phasing plan provided that the Town approves the plan and maintains accountability for it, in consultation with and to the satisfaction of the Region.

The fiscal impact report provided as part of the application discusses the projected timing of development of the Macville lands, which is assumed to be built-out by 2031 but it does not provide a phasing plan/staging plan in the context of the broader ROPA 30 area. While the application does discuss the technical aspects associated with servicing the subject lands and reference the commitment of the landowners group to upfront finance the construction of the site's internal infrastructure, further detail is required on how the infrastructure will be financed. Much of the required infrastructure is not currently contemplated in the Region's most recent Water and Wastewater Master Plan, 2020. Regional staff look forward to engaging with the Town and landowners group with specific discussion on the phasing and funding mechanism of required infrastructure.

In addition, in order to ensure the 11,100 people and 3,600 jobs are met in ROPA 30 among the separate applications, the application materials should demonstrate an approved Town of Caledon approach ensuring that total projected population and employment conforms to the Regional Official Plan. Each area of ROPA 30, including this area, should accommodate an appropriate proportion of the total Regional forecast population and employment. The Town of Caledon will need to be satisfied with the density provided in this application area, particularly around the future transit area.

Minister's Zoning Order:

On March 5, 2021 a Minister's Zoning Order (MZO) was made under the Planning Act through Ontario Regulation 171/21. The subject lands west of Humber Station Road and within ROPA 30 are now within a Mixed-Use Residential Zone, while the lands east of Humber Station Road and north of the settlement boundary are a Mobility Transit Hub Zone (a public transit depot with specified non-residential accessory uses). The Macville Secondary Plan, and updated supporting studies, should create a land use framework that enables the MZO's intended uses and does not conflict with the Minister's outlined restrictions.

The following Regional comments are divided between comments specific to Macville Secondary Plan lands within the approved Settlement Boundary (ROPA 30) and comments specific to lands outside of the approved settlement boundary.

1.0 Macville Secondary Plan Lands Outside of Approved Settlement Boundaries

1.1 Water Resource System and Natural Heritage System Policy Conformity

For lands in the proposed Macville Secondary Plan outside of the approved Bolton settlement boundary, these lands are not currently within the Regional Urban Boundary or within an existing Rural Service Centre and are designated Prime Agricultural Area in the Regional Official Plan. Therefore, the proposed designation to urban uses is not consistent with the PPS, the Growth Plan and the Region of Peel Official Plan.

This request will be considered through the Peel 2041+ Official Plan and MCR process, including consideration of the subject lands to be included in the settlement area as part of the SABE Study which is being undertaken as part of Peel 2041+. Should the subject lands be included in the SABE Study as a new settlement area in Caledon, these lands will be subject to new policy direction in the Region of Peel Official Plan including technical study recommendations which are being developed through the Scoped Subwatershed Study supporting the SABE work. The Scoped Subwatershed Study will be including recommendations regarding Natural Heritage System and Water Resource System identification, protection, restoration and enhancement with technical recommendations addressing water management, flooding and erosion control as mentioned previously. The planning for the Macville Secondary Plan lands outside of the approved settlement boundary

will be subject to additional policies that will provide direction for more detailed studies at the local level to guide secondary planning.

The implementation of Natural Heritage System and Water Resource System mapping in the Macville Secondary Plan area will need to consider existing and proposed policy direction of the Region of Peel Official Plan, recommendations that will be provided through the Scoped Subwatershed Study, and address consistency and conformity requirements in accordance with the PPS and Growth Plan.

1.2 Prime Agricultural Areas Policy Conformity

For lands in the proposed Macville Secondary Plan outside of the approved Bolton settlement boundary, these lands are not currently within the Regional Urban Boundary or within an existing Rural Service Centre and is designated Prime Agricultural Area in the Region of Peel Official Plan. Therefore, the proposed designation to urban uses is not consistent with the PPS, Growth Plan and the Peel Official Plan. Notwithstanding the redesignation of the Option 3 lands through ROPA 30, the remaining lands within the proposed Macville Secondary Plan are within the Prime Agricultural Area as identified on Provincial and Regional mapping of the Greater Golden Horseshoe agricultural system.

2.0 Macville Secondary Plan lands within approved Settlement Boundary (ROPA 30)

2.1 Growth Management

Updates to the Planning Justification Report and Secondary Plan will be required to speak to the following:

Population and Employment:

As described above, the ROPA 30 lands which include the subject lands of this application and beyond have been allocated 11,100 people and 3,600 jobs. In Draft Table 7.16 of the Macville Secondary Plan a total of 11,970 people and population-related jobs have been identified. This is a significant proportion of the ROPA 30 allocation on the lands, however this number may be attributed to the entire lands owned by the applicant, and or, growth outside the 2031 planning horizon. As described in previous comments, this draft table must clearly outline numbers associated with the lands within the Bolton settlement boundary to 2031 only.

For population and jobs that are attributed within the boundaries of the approved settlement area, please clarify the phasing and staging of the development and achievement of allocated growth over the 2031 horizon vs. what may be proposed to be implemented beyond that.

Regional staff recommend that the Macville Secondary Plan include a mix of residents and jobs to better utilize the future Bolton GO transit service and achieve complete community objectives. Employment opportunities beyond population-related employment should be planned for within the Macville Secondary Plan. The MZO does permit a range and mix of land uses which can provide employment (industrial uses excluded). Draft Policy 7.16.6.1.1 refers to office uses, but this has not been reflected in Draft Table 7.16.

Draft Table 7.16 also notes a density ascribed to ROPA 30, however no specific density was set in the ROPA text for this area. Please consider the following parameters in the updated materials which will affect the density of the plan area:

- The population and jobs allocated in ROPA 30;
- Transit-supportive densities and the potential for a Major Transit Station Area (MTSA) to be planned for 150 ppj/ha; and

- The land uses permitted within the MZO lands.

Housing Growth:

The proposal notes that there is an anticipated 625 units per year until 2030. The applicant must demonstrate, to the satisfaction of the Town, which portion of total ROPA 30 residents are accommodated through the area in the Macville Secondary Plan and within the approved settlement area.

2.2 Major Transit Station Area

The Bolton GO station has been studied as a potential MTSA (HUB-1) through the Regional Official Plan Review, known as Peel 2041+. At this time and in the December 2020 draft MTSA ROPA, the station has been identified as a “planned” station which is undelineated, though draft policies do require that lands around planned MTSA be reserved for transit-supportive land uses. The Region continues to review new information as available and is monitoring any further announcements from Metrolinx and the Ministry of Transportation regarding the Bolton GO station service horizon year. If delineated, an MTSA delineated on a GO rail corridor would require a density of 150 people and jobs per hectare, though the density may be achieved beyond the 2051 planning horizon. The land uses, road network, local transit routes, and active transportation planned within the MTSA should be structured to best achieve overall MTSA objectives.

Resubmissions of this application and the planning justification report should include commentary on achieving the Growth Plan, prescribed densities in relation to phasing and staging of development.

2.3 Healthy Communities

It is required that a large-scale healthy development assessment (HDA) be undertaken in the planning development application review process for the Macville Secondary Plan segment of the ROPA 30 settlement area, in consultation with the Region. This will assist planners in effectively creating healthy and complete communities, including opportunities for active transportation. An HDA measures the health-promoting potential of a development proposal by calculating a score to communicate the achievement of design standards that are essential to building healthy and complete communities. HDA’s core elements include: density, service proximity, land use mix, street connectivity, streetscape characteristics and efficient parking. Upon receiving the completed HDA, further comments will be provided. The HDA must be submitted with the revised submission.

2.4 Affordable Housing

The Planning Justification Report must be revised to speak to affordable housing. The current application does not include or mention affordable housing commitments and does not meet the objectives of the Peel Housing Strategy and Regional Official Plan, particularly policy 5.4.3.2.9.1.e). For instance, Regional staff have concerns that the housing unit types included do not align with the new Regional housing targets including affordability, tenure, and density – for more information and further reference on these targets please see the table below. It is recommended that the revised materials reference the Regional Official Plan, as well as the Peel Housing Strategy to, as well as provide an updated analysis or breakdown of affordable housing commitments on the site.

<u>Target Area</u>	<u>Targets</u>
<u>Affordability</u>	That 30% of all new housing units are <i>affordable housing</i> . Encourage 50% of all <i>affordable housing</i> to be <i>affordable to low income residents</i> .
<u>Tenure</u>	That 25% of all new housing units are rental tenure.
<u>Density</u>	That 50% of all new housing units are in forms other than single-detached and semi-detached houses.

As per ROPA 30, an affordable housing assessment must be prepared by the applicant as part of the Macville Secondary Plan in consultation with the Region that will include policies for the provision of affordable housing, and must address the following items and requirements:

- Contribution towards the achievement of Regional new housing unit targets;
- The availability of an appropriate range and mix of housing types, densities, sizes and tenure that contribute to the supply of affordable housing; and
- Identification and conveyance strategy for affordable housing, in consultation with the Region of Peel.

Further, it should be noted that the site may be applicable to inclusionary zoning (IZ) in the foreseeable future due to its proximity to the MTSA. More information will be shared with the development community and the applicant once the draft Regional IZ policies have been finalized over the coming months.

2.5 Water Resource System and Natural Heritage System Policy Conformity

For the lands in the proposed Macville Secondary Plan that are within the approved Bolton settlement area, the approved policies of ROPA 30 provide details related to the requirements for natural heritage, including policy 5.4.3.2.9.1 j) requiring a Comprehensive Environmental Impact Study and Management Plan (EIS and MP) completed to the satisfaction of the Region, the Town of Caledon and the Toronto and Region Conservation Authority (TRCA). Please note the TRCA is the Region's technical advisor on matters related to the environment and has been requested to provide technical review comments on the Comprehensive Environmental Impact Study and Management Plan for the Macville Secondary Plan dated February 2021. Prior to the Region's support of the secondary plan, technical comments received from the TRCA must be addressed to the satisfaction of the Region and the Town.

The EIS and MP should build upon the recommendations and findings from the completed supporting environmental background work for the Bolton Residential Expansion Study to ensure that natural heritage system features and areas are appropriately protected, restored or enhanced.

The water management, natural heritage and water resource system planning for the Macville Secondary Plan is required to conform to the approved requirements in ROPA 30, and the current in-effect policies of the Regional Official Plan and applicable Provincial policy requirements set out in the Provincial Policy Statement (PPS), 2020, and the Growth Plan. The revised planning justification should ensure that the applicable policy requirements as described are addressed.

Please also note that the Region is undertaking technical studies applicable to the planning of new community areas in Caledon through the Peel 2041+ SABC Study which includes a Scoped Subwatershed Study providing water management and natural heritage system planning recommendations. These should be reviewed as the study advances and provides

useful information relevant to the implementation of the Macville Secondary Plan. The study is providing direction towards the implementation of stormwater management controls including recommendations for Regional (Regulatory) Storm Control. This subject area within the approved ROPA 30 portion of the Macville Secondary Plan straddles both the West Humber River and Main Humber River watersheds. The Macville Secondary Plan should provide appropriate direction to address the required stormwater, flooding and erosion requirements for development in the area. It is recommended that the Town of Caledon and relevant approval agencies be satisfied that the proposed water management, stormwater, flooding and erosion controls are acceptable prior to approval of the secondary plan.

2.6 Prime Agricultural Areas Policy Conformity

For the lands in the proposed Macville Secondary Plan that are within the approved settlement area boundary, the approved policies of ROPA 30, including policy 5.4.3.2.9.1 m) provide details related to the requirements for an Agricultural Impact Assessment (AIA) completed to the satisfaction of the Region, the Town of Caledon and the Toronto and Region Conservation Authority (TRCA). This includes identifying through mapping any Provincial Minimum Distance Separation I (MDS I) calculated setbacks and prohibiting development in the Setback Area(s).

The Planning Justification Report for the Macville Secondary Plan indicates that a Minimum Distance Separation setback encroaches along the northern portion of the proposed Secondary Plan (#253 – Westlake Farm). The recommendation in the Planning Justification Report that a policy be included in the Macville Secondary Plan (Section 7.16.18) to recognize the MDS setback that exists along the northern limit of the subject lands and to restrict growth in this area until the MDS setback is no longer required, is supported. The specific wording for the policy should be provided by the applicant in their draft amendment document and be consistent with similar policies included in the Town of Caledon Official Plan. The MDS setback should be illustrated on the Macville Secondary Plan schedule included in the Town's Official Plan. The Town/applicant may reference the MDS I setback calculations prepared by Planscape Inc. on behalf of the Region or by Colville Consulting on behalf of the Town that were prepared for the Town's Bolton Residential Expansion Study. A copy of the report titled "Update of the Minimum Distance Separation Analysis" prepared by Planscape Inc. dated May 8, 2020 is attached.

2.7 Climate Change

The proposed secondary plan should comprehensively implement the PPS and Growth Plan requirements for climate change, as well as the Region's current and proposed policy direction for mitigating greenhouse gas emissions and adapting to the impacts of climate change being developed through the Peel 2041+ Official Plan Review.

ROPA 20 updated sustainability policies and introduced energy policies in the Regional Official Plan. Section 1.3.5 of the Regional Official Plan provides a framework for sustainable development which includes an over-arching theme of sustainability and the application of a sustainable development framework. Section 3.7 of the Regional Official Plan provides policy direction on energy, including energy conservation, energy efficiency, and diversity using renewable and alternative energy systems. As part of the Peel 2041+ Official Plan and MCR process, new policies are being developed for designated greenfield areas as well as new community areas (SABE) that are supported by technical studies, and also implement policy direction in accordance with the PPS and Growth Plan.

Regional staff recommends that prior to approval of the Macville Secondary Plan, that the Town require the preparation of a Community Energy and Emissions Reduction Plan that addresses (i) feasibility, planning and implementation of net-zero carbon emissions, (ii) feasibility of implementing alternative and renewable energy systems, including district

energy, (iii) sustainable development guidelines, and (iv) electrical vehicle charging infrastructure as well as a Climate Change Adaptation Plan, addressing the reduction of community and environmental vulnerability to changing climate conditions, that directly support a climate change framework within the proposed secondary plan. The policies addressing climate change, in particular requirements to address the feasibility and implementation of distributed renewable energy systems should be strengthened in the proposed secondary plan. Appropriate policy direction should be incorporated into the secondary plan to implement the study recommendations.

Concluding Remarks

As demonstrated in this letter, if future resubmissions include development plans on lands outside of ROPA 30 for contextual reference:

- Regional staff will not be able to provide detailed comments on those external lands; and
- All application documentation, mapping, calculations, etc. must differentiate between lands within the 2031 settlement boundary which are subject to this application review, and lands which may be outside.

Resubmissions of this application and supporting studies, including the Planning Justification Report, must demonstrate conformity to ROPA 30 and the entire Regional Official Plan, including recognition of how the application proposes to contribute to the 11,100 people and 3,600 jobs allocated to the entirety of the approved ROPA 30 lands which coincide with this proposed development and the other approved areas. Resubmissions must include the supporting studies to be approved as part of the Macville Secondary Plan as outlined in policy 5.4.3.2.9.1 of the Regional Official Plan, which are further discussed throughout these comments.

Regional staff look forward to working collaboratively with the Town of Caledon and applicant to advance the application. Regional staff are available to engage further in this process with the applicant to address detailed comments. Revised materials as noted above are required. Updated Regional comments will be provided when the requested revised materials are received.

If there are any questions or concerns, please contact me at ricardo.razao@peelregion.ca or alternatively John Hardcastle at john.hardcastle@peelregion.ca

Regards,



Ricardo Razao
Development Services

December 23, 2021

Stephanie McVittie, MCIP, RPP
Acting Manager of Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
Stephanie.McVittie@caledon.ca

Re: Macville Secondary Plan
Region File: OZ-21-002C
Town File: POPA 2021-0002
Glen Schnarr and Associates Inc.
Bolton Option 3 Landowners Group

Dear Stephanie,

The Region has received revised materials for the above-noted application for a Local Official Plan Amendment (LOPA) referred to as the Macville Secondary Plan. It is our understanding through this resubmission that the boundary limits of the application have been amended to relate only to the lands within Macville that were approved through ROPA 30 and are currently designated within the Bolton Rural Service Centre boundary, referred to as the "Eastern Plan Area". As part of this resubmission, only the following documents were provided and reviewed:

- Revised Town of Caledon Official Plan Amendment Application form and cover letter
- Draft Macville Community Secondary Plan (Eastern Portion) prepared by Bolton LOG Consulting Team (October 2021)
- Revised Planning Justification Report (PJR) prepared by Glen Schnarr & Associates Inc. (October 2021)

All other technical documents previously received through the initial submission have not been revised. The applicant has noted that having technical documents relate to the entire Macville Community allows for a fulsome and comprehensive review, rather than looking at only the ROPA 30 approved lands in isolation. Regional staff supports the amendment made to the boundary limits of the application to relate only to the lands within Macville approved through ROPA 30. However, the technical documents continue to refer to information applicable to a planning area larger than that approved in ROPA 30 and is premature to be consider as part of this application at this time. Regional staff will require the technical documents to be revised to provide sufficient information for appropriate evaluation against the ROPA 30 policies specific to the Eastern Plan Area. Furthermore, Regional comments provided in this letter are specific only to the review of the revised material received through this resubmission. Additional comments will be provided when the revised technical documents are received through a future resubmission. The applicant has further advised that they intend to file a separate LOPA for the western portion of the Macville Community lands once those lands are brought into the Rural Service Centre following completion and approval of the Region's Municipal Comprehensive Review (MCR) process.

Following the review of the resubmission material, Regional staff advise that additional details are required to provide sufficient information for appropriate evaluation against the ROPA 30 policies specific to the Eastern Plan Area and offer the following comments:

Planning and Development:

- The applicant is required to resubmit a revised Macville Secondary Plan that meets the requirements in Section 5.4.3.2.9 of the Regional Official Plan (October 1, 2021 consolidation) that reflect policies as noted in the in-effect ROPA 30, and further resubmit the technical studies noted in Regional policies including but not limited to the phasing, staging and implementation plan, affordable housing assessment, water management, natural heritage and water resources system planning, and agricultural impact assessment.
- Provincial approval of the Peel 2051 MCR is anticipated in 2022 and is required prior to approving an application that relies on growth allocated beyond the 2031 planning horizon. Any growth allocations and policies in the Draft Regional Official Plan Amendment (ROPA) prepared for the Peel 2051 MCR are not yet in-effect and request for expansion to 2051 are considered premature at this time.
- Regional staff note that the area outside ROPA 30 is included in the draft conceptual settlement area boundary expansion (SABE) currently being evaluated through the Region's MCR, and any lands currently not designated with the Region of Peel Official Plan will not be finalized until Provincial approval. However, as the draft Macville Secondary Plan policies themselves continue to refer to information applicable to the entire Macville Secondary Plan area (e.g. 7.16.2, Table 7.16, and 7.16.4.1.3) with lands outside the settlement boundary, this application cannot be approved prior to the final Provincial decision on Peel's MCR. For example, Table 7.16 presents the population and employment targets for the entire Macville Secondary Plan and is inconsistent with the revised bounds of the development application (lands in the settlement boundary through ROPA 30). As such, planning applications outside of ROPA 30 are considered premature.
- The northern boundary of the Eastern Plan Area does not align with the boundary of the approved ROPA 30 lands. Please review and consider a revised Eastern Plan Area boundary to encompass the full ROPA 30 lands.
- Within the Planning Justification Report on Page 3 it notes the Region of Halton Official Plan, this is to be revised to the Region of Peel.

Growth Management

- The draft LOPA and Table 7.16 of the Macville Secondary Plan references a population of 10,910 and population related jobs of 1,060 for the entirety of the Macville area. However, additional information is required that clearly outlines numbers associated with the lands within the Eastern Plan Area of the Macville Community submitted in the revised application.

- The Macville Secondary Plan draft policies refer to units per net hectare for the low density residential, medium density residential, and mixed-use designations. Additional information should be provided in the Planning Justification Report regarding the number of people per unit and jobs provided in mixed use lands, ultimately presenting the density of these lands in people and jobs per hectare.

Requirements of the 2031 Planning Horizon vs. 2051

- A comparison table of growth management statistics including but not limited to people, jobs, and density is required to be presented in resubmission material. The information should clearly detail what can be attributed to the 2031 planning horizon (Growth Plan 2006, ROPA 24, and ROPA 30 allocations), vs. what may be beyond that.
- As higher order transit and a Major Transit Station Area (MTSA) is being planned for, Regional staff continue to recommend that the Macville Secondary Plan include a greater mix of community uses and jobs to better utilize the future Bolton GO transit service and achieve complete community objectives. Therefore, a phased approach to accounting for people, jobs, and density in the Eastern Plan Area is recommended to be presented in the Planning Justification report.
- The Planning Justification Report must be revised to describe how the Eastern Plan Area contributes an appropriate proportion of the 11,100 people and 3,600 jobs allocated to the entirety of the approved ROPA 30 designated greenfield lands which coincide with settlement areas within and beyond the Macville Community. Any people and jobs in excess of the ROPA 30 allocations must be attributed to subsequent planning horizons.
- Please note that the growth allocations and policies in the Draft ROPA prepared for the Peel 2051 MCR are not yet in-effect. Provincial approval of the Peel 2051 MCR is anticipated in 2022 and is required prior to approving an application which relies on growth allocated beyond the 2031 planning horizon.

Major Transit Station Area & Density

- The Draft ROPA prepared for the Peel 2051 MCR has proposed a delineated “Primary” MTSA for Bolton GO Station, with a minimum density of 150 people and jobs per hectare. Please advise of the density of the lands in the Eastern Plan Area and explore the appropriate mix of land uses to best utilize the higher order transit access within the MTSA (i.e. reconsider the location of infrastructure such as stormwater management).
- The Planning Justification Report on page 88 provides information on planned densities within an 800 m radius of the future GO Station. The number of people, population-related jobs, and density should be calculated based on the Eastern Plan Area boundary (which is entirely within the draft Bolton GO HUB-1 MTSA in the Peel 2051 MCR) rather than an 800m radius.
- In the Macville Secondary Plan document, a “Mobility Transit Hub” designation appears in the Schedule C-8 legend but does not appear on the mapping. This should be removed on the Eastern Plan Area version of Schedule C-8.

- Clarification is required to understand if draft policy 7.16.8.1.1 of the Macville Secondary Plan and the “Mobility Transit Hub” is referring to the GO station location or the proposed Bolton GO HUB-1 MTSA lands generally. The boundary of the draft HUB-1 MTSA does not align with the proposed “Mobility Transit Hub.”
 - The terminology “Mobility Transit Hub” can be confused with the MZO Mobility Transit Hub Zone, therefore revised terminology is recommended.

Land Uses

- Employment opportunities beyond population-related employment should be planned for within the Macville Secondary Plan. The Minister’s Zoning Order (MZO) O.Reg. 171/21 does permit a range and mix of land uses which can provide employment (industrial uses excluded), but this has not been reflected in the population and employment figures presented.
 - The draft Secondary Plan schedule C-8 depicts a small “Employment” parcel in the Eastern Plan Area. The Planning Justification report figure 7 is more specific and indicates “employment – Office/Innovation.”
 - To balance the mix of people and jobs, it is recommended that the Eastern Plan Area accommodate more jobs via additional employment lands or mixed office-residential land use designations.
- For clarity and to ensure conformity with the land uses prescribed in the MZO, it is recommended that the “Employment” designation referenced on schedule C-8 of the Macville Secondary Plan be retitled and draft policies in section 7.6.13 be revised to more accurately reflected the Minister’s permitted land uses. For example, draft policy 7.16.13.4 permits prestige industrial uses while section 5.5.4.1 of the Caledon Official Plan defines prestige industrial to include land uses such as manufacturing, which are prohibited in the MZO Mixed-Use Residential Zone or Mobility Transit Hub Zone.
- The “employment” designation and its office/innovation uses are not permitted in its current location in the Mobility Transit Hub Zone in the MZO. Employment uses such as a business office can be located in the Mixed-Use Residential Zone, and it is recommended that uses which contribute non-population-related employment be located as close to the future GO station location as possible.
- The full extent of land uses intended in the “Mixed-Use” designation shown on Schedule C-8 of the Macville Secondary Plan (such as residential) may not be permitted in its current location in the Mobility Transit Hub Zone in the MZO.

Phasing and Implementation:

- As the fiscal impact report has not been revised, comments provided in our June 2021 letter continue to apply including the requirement for a phasing and staging plan in the context of the broader ROPA 30 area, including further detail on how the infrastructure will be financed. Much of the required infrastructure is not currently contemplated in the regions Water and Wastewater Master Plan. Regional staff look

forward to engaging with the Town and landowners group with specific discussion on the phasing and funding mechanism of required infrastructure.

Affordable housing:

- An affordable housing assessment has not been submitted and as such, the comments provided in our June 2021 letter continue to apply.
- The Planning Justification Report notes that a variety of built forms such as single detached dwellings, semi-detached dwellings, street, lane, stacked and back-to-back townhouses, and mid-rise developments including mixed uses will provide for affordable, accessible and adequate housing due to the range of densities, building types and built forms. However, the application does not include or mention affordable housing commitments that are satisfactory to the Region, noted in ROPA 30 policies, and does not meet the objectives of the Peel Housing Strategy and Regional Official Plan. For instance, the housing unit types included do not align with the new Region-wide housing targets on affordability, tenure, and density. For more information and further reference on these targets, please see the table below.
- It is recommended that the applicant review the Regional Official Plan, as well as the Peel Housing Strategy to be better familiar with the housing requirements needed in the community, as well as provide an updated analysis or breakdown of affordable housing commitments on the site.

<u>Target Area</u>	<u>Targets</u>
<u>Affordability</u>	That 30% of all new housing units are <i>affordable housing</i> .
	Encourage 50% of all <i>affordable housing</i> to be <i>affordable to low income residents</i> .
<u>Tenure</u>	That 25% of all new housing units are rental tenure.
<u>Density</u>	That 50% of all new housing units are in forms other than detached and semi-detached houses.

- As per ROPA 30, an affordable housing assessment must be prepared as part of the Macville Secondary Plan in consultation with the Region that will including policies for the provision of affordable housing, and must address the following items and requirements:
 - Contribution towards the collective achievement of Region-wide new housing unit targets;
 - The availability of an appropriate range and mix of housing types, densities, sizes and tenure (e.g. rental) that contribute to the supply of affordable housing; and Identification and conveyance strategy for affordable housing. Conveyances of land or units for affordable housing must include zoning appropriate for affordable housing development, be tied to development milestones (e.g., registration of plan of subdivision for the applicable lands), and cost-sharing provisions.

- A Housing Analysis is an application requirement for all rezoning, subdivision and site plan applications to demonstrate implementation of the results of the Housing Assessment.
- Further, it should be noted that the site may be applicable to inclusionary zoning (IZ) in the foreseeable future due to its proximity to the MTSA. More information will be shared with the development community and the applicant once the draft Regional IZ policies have been finalized over the coming months. More detailed IZ implementation policies and zoning will be undertaken by the Town of Caledon.

Water Resource System and Natural Heritage System Policy Conformity:

- For the lands in the proposed Macville Secondary Plan that are within the approved Bolton settlement area, the approved policies of ROPA 30 provide details related to the requirements for natural heritage, including policy 5.4.3.2.9.1 j) requiring a Comprehensive Environmental Impact Study and Management Plan (CEISMP) completed to the satisfaction of the Region, the Town of Caledon and the Toronto and Region Conservation Authority (TRCA).
- Please note that the Conservation Authorities (CAs) are the Region's technical advisors on matters related to the environment. Regional staff, with advice from the CAs, previously reviewed background studies that were prepared for the Bolton Residential Expansion Study and Regional Official Plan Amendment 30 (ROPA 30), including the Bolton Residential Expansion Study: Phase 3 Technical Memorandum – Development of a Preliminary Natural Heritage System and Bolton Residential Expansion Study Background Environmental Study prepared by Dougan & Associates dated June 2014 and October 2014 respectively. A CEISMP prepared by Beacon Environmental dated February 2021, Functional Servicing Report prepared by Urbantech dated February 2021 and Preliminary Hydrogeological Investigation prepared by DS Consultants LTD dated February 2021 have been submitted in support of the Secondary Plan for the subject lands. The TRCA is currently reviewing the CEISMP and supporting technical studies and will be providing technical comments to confirm the studies are acceptable and there are no Regional policy concerns with the secondary plan.
- The TRCA's review should ensure that the CEISMP has built upon and appropriately addressed the recommendations and findings from the completed supporting environmental background work for the Bolton Residential Expansion Study (BRES) to ensure that natural heritage system features and areas are appropriately protected, restored or enhanced.
- The water management, natural heritage and water resource system planning for the Macville Secondary Plan is required to conform to the approved requirements in ROPA 30, and the current in-effect policies of the Regional Official Plan and applicable Provincial policy requirements set out in the Provincial Policy Statement (PPS), 2020, and the Growth Plan for the Greater Golden Horseshoe (Growth Plan), 2019. The Planning Justification Report should ensure that the applicable policy requirements as described are addressed.
- The Peel 2051 SABE Study which includes a Scoped Subwatershed Study providing water management and natural heritage system planning recommendations should be reviewed. The study is providing direction towards the implementation of

Public Works

stormwater management controls including recommendations for Regional (Regulatory) Storm Control. This subject area within the approved ROPA 30 portion of the Macville Secondary Plan straddles both the West Humber River and Main Humber River watersheds. The Macville Secondary Plan should provide appropriate direction to address the required stormwater, flooding and erosion requirements for development in the area.

- It is recommended that the Town of Caledon and relevant approval agencies be satisfied that the proposed water management, stormwater, flooding and erosion controls are acceptable prior to approval of the policies or application.

Healthy Communities

- It is required that a large-scale healthy development assessment (HDA) be undertaken in the planning development application review process for the Macville Secondary Plan segment of the ROPA 30 settlement area, in consultation with the Region. This will assist planners in effectively creating healthy and complete communities, including opportunities for active transportation. An HDA measures the health-promoting potential of a development proposal by calculating a score to communicate the achievement of design standards that are essential to building healthy and complete communities. HDA's core elements include: density, service proximity, land use mix, street connectivity, streetscape characteristics and efficient parking. Upon receiving the completed HDA, further comments will be provided. The HDA must be submitted with the revised submission.

Prime Agricultural Areas Policy Conformity:

- The approved policies of ROPA 30, including policy 5.4.3.2.9.1 m) provide details related to the requirements for an Agricultural Impact Assessment (AIA) to be completed prior to the adoption of the secondary plan. The Region requires a statement in the revised Planning Justification Report that Regional Official Plan Policy 5.4.3.2.9.1 m) has been satisfied. The Planning Justification Report should address whether the mitigation of potential impacts of development on surrounding agricultural operations and lands beyond implementing Minimum Distance Separation (MDS) setbacks is appropriate or feasible to address land compatibility where agricultural uses interface.
- The Planning Justification Report indicates that a Minimum Distance Separation (MDS) setback encroaches along the northern portion of the proposed Secondary Plan (#253 – Westlake Farm) and in the western portion (#342 - Sprucelayne Farm). The recommendation in the Planning justification Report that a policy be included in the Macville Secondary Plan (Section 7.16.18) to recognize the MDS setback that exists within the subject lands and to restrict growth in this area until the MDS setback is no longer required, is supported. The specific wording for the policy should be consistent with similar policies included in the Town of Caledon Official Plan for the Mayfield West Phase 2 Stage 1 lands.
 - The MDS setback should also be illustrated and shown on the Macville Secondary Plan schedule to be included in the Town's Official Plan. The Town could utilize the MDS I setback calculations prepared by Planscape

Inc. on behalf of the Region or by Colville Consulting on behalf of the Town that were prepared for the Town's BRES for this purpose.

- In accordance with policy 5.4.3.2.9.1, the Planning Justification Report and Macville Secondary Plan policies should note that lands within the Setback Area will be considered a Type A Land Use for the purpose of applying Provincial MDS II Formulae.

Concluding Remarks

As demonstrated in this letter, the applicant is required to resubmit a revised Macville Secondary Plan that meets the requirements in Section 5.4.3.2.9 of the Regional Official Plan which reflects policies as noted in the in-effect ROPA 30. Furthermore, a resubmission of revised technical studies noted in Regional policies will be required to provide sufficient information for appropriate evaluation against the ROPA 30 policies specific to the Eastern Plan Area. As such, all application documentation mapping, calculations, etc. must differentiate between lands within the 2031 settlement boundary and lands which may be outside.

Regional staff look forward to working collaboratively with the Town of Caledon and applicant to advance the application. Regional staff are available to engage further in this process with the applicant to address detailed comments. Revised materials as noted above are required. Updated Regional comments will be provided when the requested revised materials are received.

If there are any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4093 or by email at patrick.amaral@peelregion.ca

Yours truly,



Patrick Amaral MES (PI)
Intermediate Planner
Planning and Development Services, Region of Peel

CC: Christina Marzo, Manager, Region of Peel

April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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**RE: Caledon Strong Mayor Powers - Proposed Zoning By-law Amendment
Lands at the North-East Corner of Regional Road 50 and Columbia Way, Town of
Caledon
Town File Number: RZ 2024-0011C (Area A12)
Region File Number: RZ 24-011C
Related File: Proposed Official Plan Amendment (File No. POPA 2022-0002) and
Zoning By-law Amendment (File No. RZ 2022-0001)**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands located at the north-east corner of Regional Road 50 and Columbia Way. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from a site-specific commercial zone (C-577) to a mixed-use zone.

Application is Premature

While the majority of these lands are designated as Bolton North Hill Commercial Area in the Bolton Land Use Plan (Schedule 'C' in the Town of Caledon Official Plan), the proposed development looks to implement residential uses on the property and therefore requires an Official Plan Amendment to permit the uses. The Region of Peel suggests that this By-law is premature without the Official Plan Amendment supported by satisfactory technical studies (i.e. servicing study, transportation study, stormwater management study, etc.). Through the related Official Plan Amendment application, all stakeholders would collaborate to ensure that the site will be a well-planned and sustainable with a variety of land uses (including housing types and affordable housing types), community infrastructure and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). The studies which have been submitted as part of the related Official

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tel: 905-791-7800

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Plan Amendment are not yet satisfactory. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Town has received Proposed Official Plan Amendment (File No. POPA 2022-0002) and Zoning By-law Amendment (File No. RZ 2022-0001) applications for the lands, which was circulated to the Region for review and comment. The most recent Regional comment letter, attached, indicated that additional information was required prior to the Region being satisfied with the applications. A revised submission to address Regional comments has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following amendments to the By-law:

- While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of "Non-Market Housing", unless there is no other way. In reviewing the various housing typology definitions in the Town's Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use.
- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be

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added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

- The applicant is encouraged to explore the opportunity for locating a licensed childcare centre within the proposed development. The Region notes that Private Home Day Cares are not permitted uses within a within the RMD-AAA-HDD zone. The Region would encourage the Town to consider adding this use.
- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-AAA-HDD zone which requires a minimum width of 6 metres for a private road/street or lane.
- In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. Regional staff question if, for this site, Town staff meant that the related Official Plan Amendment will need to be completed. If the Town intends to require the Official Plan Amendment be adopted, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring the Official Plan Amendment for these lands (although not expressed in the By-law) and noting that there is no paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law be added to reflect the date the Official Plan Amendment for this site becomes in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Official Plan Amendment is in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (“H”) provisions be applied to the entirety of the lands subject to RZ 2024-0011, by applying a Holding (“H”) symbol to the RMD-AAA-HDD zone.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, though Regional staff question if this comment may have been

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intended to mean that the site-specific Official Plan Amendment would be required. However, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing specified in the Holding condition 2.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.

Considering that the related Official Plan Amendment and Zoning By-law Amendment applications are not yet satisfactory or approved, the Region is requesting a number of holding provisions to ensure that the site is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision ensures that the related Official Plan Amendment (POPA 2022-0002) is completed. Recognizing that the planning authority will change as of July 1, 2024, the Region is not included as being a “satisfied” party in this condition.
- The second holding provision (comprised of subsections 3.a to 3.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The third holding provision (comprised of subsections 4.a to 4.f) speaks to the requirements for ensuring a successful transportation network, including Regional roads.
- The fourth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (5, 6, 7 and 8) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-AAA-HDD	245 Highway 50	Until such time as the Holding Symbol is removed,

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tel: 905-791-7800

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		<p>no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-AAA-HDD, the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has received approval of the related Official Plan Amendment together with the required supporting studies. 2. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. 3. The Owner has received written confirmation from the Region of Peel that: <ol style="list-style-type: none"> a. a satisfactory Transportation Study for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with
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		<p>Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands;</p> <ul style="list-style-type: none"> d. there is sufficient capacity on the Regional road network to service the lands; e. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, f. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>4. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands (including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>5. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>6. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>7. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p>
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L6T 4B9
tel: 905-791-7800

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		8. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- The proposed By-law seeks to reduce the number of parking spaces required. In addition, there does not appear to be parking rates established for Non-Market Housing. With these proposed reductions and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads unless in accordance with the appropriate By-laws.
- The proposed By-law greatly reduces the regulatory framework for ensuring that lots have permeable surfaces and permits the majority of the lot to be covered with hard surfaces. An example is that the By-law includes no maximum building area and a 25% minimum landscape area. There may be many challenges with this, one being an increase in surface water runoff. Stormwater runoff is not permitted to discharge to a Regional road.
- The Region seeks confirmation from the Town as to whether the proposed Zoning By-law Amendment (RZ 2022-0001) will continue to be processed on the lands, or if the file will be closed should this Zoning By-law Amendment subject to Strong Mayors Powers be approved.
- Without the completion of the review on the proposed Official Plan Amendment and Zoning By-law Amendment as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time, it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments. The Region has and will continue to provide more detailed comments on the proposed Official Plan Amendment (File No. POPA 2022-0003) application. The Region will also provide more detailed

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Suite B
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L6T 4B9
tel: 905-791-7800

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comments on the related Zoning By-law Amendment (File No. RZ 2022-0001) application, should this application continue to be processed.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Town of Caledon
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation

Appendix I: Regional Comments POPA 2022-0002 dated August 31, 2022

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

August 31, 2022

Adam Wendland
Community Development Planner
Development Services
Town of Caledon
6311 Old Church Road,
Caledon ON, L7C 1J6

**Re: Peel Region Comments
Town File: POPA 2022-0002 & RZ 2022-0001
Region File: OZ-22-002C
14245 Highway 50
Town of Caledon
Glen Scharr and Associates Inc. on behalf of Columbia Square Inc**

Region of Peel Requirements:

Region of Peel Staff have reviewed the above noted application for Site Plan Approval. The following must be fulfilled prior to Regional clearance:

- As the shared services are proposed to be shared with multiple condominiums, the Region requires confirmation from the Town of Caledon CBO prior to OZ approval to confirm the nonstandard approach will be allowed.
- A satisfactory Functional Servicing Report is required prior to Prior to OZ/RZ approval the non-refundable Functional Servicing Report Fee of \$515 is required as per the current Fees By-law
- A satisfactory TIS is required prior to Prior to OZ/RZ approval. Please see the below comments for further details.

Region of Peel Coomets:

Region of Peel Staff have reviewed the above noted application for Site Plan Approval. The following comments are intended to assist in preparation of the resubmission.

ROPA Exemption

- Peel Region By-Law 1-2000 states that local Official Plans amendments are exempt from Regional approval where they do not require an amendment to the Regional Official Plan; where they have regard to the Provincial Policy Statement and applicable Provincial Plans, where the City Clerk has certified that processing was completed in accordance with the Planning Act and where the Region has advised that no Regional Official Plan amendment is required to accommodate the local Official Plan amendment. We are pleased to advise that this proposed amendment is exempt from approval under the Planning Act by the Region of Peel.

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Suite B
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L6T 4B9
tel: 905-791-7800

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Site Servicing Comments:

- The applicant shall verify the location of the existing service connections to the subject site and the contractor shall locate all existing utilities in the field. Requests for underground locates can be made at <https://www.ontarioonecall.ca/portal/>
- The Region of Peel has recently released a web application used for locating water, wastewater, transportation and other regional asset across Mississauga, Brampton, and Caledon as well as viewing as-built drawings. It is called **EPAL - External Peel Asset Locator** and is now available for external contractors and consultants. If you do not have an existing account, provide us with your name, name of your agency/company and your email address and we will request access on your behalf. Once access has been requested, instructions will be provided in the welcome email. Please contact Iwona Frandsen at iwona.frandsen@peelregion.ca, to request access.
- If you require assistance in addition to the information found in EPAL, please contact Records at PWServiceRequests@peelregion.ca
- Prior to Site Plan approval, Site servicing drawings are required for Review by Region of Peel Servicing Connections
- To accompany the servicing review, the supporting Mechanical Drawings are required for review by Servicing connections prior to issuing Region of Peel Site Servicing connection approval.
- All Servicing and Grading drawings shall reflect the Region's and Local Municipality's road widening requirements
- Provision(s) for the installation of the property line sanitary manhole and water valve and chamber must be made where parking structures abut property lines.
- A satisfactory Servicing Submission is required prior to Official Plan Amendment and site plan approval
- Final Regional Site Servicing connection approvals are required prior to the local municipality issuing Building Permit
- Regional Site Servicing Connection approvals will not be issued until Preliminary Acceptance is granted by the Region of Peel for any external works required to facilitate development.
- Please be advised that due to the ongoing developments of the novel coronavirus outbreak, the Region of Peel is currently implementing various measures to ensure the safety of our customers, employees and the workplace. Our front counter is now closed to the public and our staff have been directed to work from home for the foreseeable future. Therefore, Servicing Connections cannot process any payments over the counter at this time, however, we will accept Electronic Fund Transfers (EFT). Please contact Servicing Connection at siteplanservicing@peelregion.ca for the process to submit an Electronic Fund Transfer for your servicing application fees.

Regional Easement/Infrastructure Review Requirements

There is a Regional sanitary sewer easement on the subject property. Please be advised that unauthorized encroachments on Regional easements will not be permitted

- Certain restrictions apply with respect to Regional easements as per the documents registered on title.

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- Existing easements dedicated to the Region of Peel for the purpose of sanitary sewer and/or watermain, must be maintained or the existing infrastructure relocated to the satisfaction to the Region of Peel, at the owner's cost
- Lines of influence of proposed underground permanent structure shall not encroach onto the existing Sanitary sewer infrastructure located within the Region of Peel easement (as per Region of Peel Sanitary Sewer Design Criteria 6.4)
- Please provide copies of all registered easement documents prior to Site Plan approval
- To determine the impact to the sanitary sewer, please submit the following drawings for the Region's review:
 - Landscaping
 - Foundation
 - Grading
 - Streetscaping
- The drawings must show the curbs, the sidewalk and the Region's infrastructure

Functional Servicing Review Requirements

A satisfactory Functional Servicing Report is required prior to OZ/RZ Approval. Please refer to the Region's Functional Servicing Report Criteria within the Functional Servicing and Stormwater Management Report document found on-line

- We have received the FSR dated 2022-01-11 and prepared by Urbanworks Engineering Corporation/Michael Paulo, P.Eng The report must be revised to include the above PPU. The modeling cannot be completed at this time.
 - Hydrant flow test was not included.
 - FSR should include all the different tenures of condominiums.
 - Please utilize the PPU as per below:
- Consultant is required to complete and submit the Multi-Use Water Demand and Wastewater Discharge table for the Region to fulfil our modelling requirements and determine the proposal's impact to the existing system. The table shall be accompanied by the Supporting graphs for the hydrant flow tests and shall be stamped and signed by the Professional Consulting Engineer. This table will be required prior to RZ/OZ Approval
- For the design flow calculations, please use your site-specific estimated population or the most current Ontario Building Code Occupant Load determination
- For the design flow calculations, please consider the following PPU's, which are found in the Region of Peel 2020 DC Background Study:
 - Singles/Semi – 4.2
 - Multiples (Townhouses) – 3.4
 - Large Apartments (larger than 750 square feet) – 3.0
 - Small Apartments (equal to or less than 750 square feet) – 1.6
- Prior to OZ/RZ approval the non-refundable Functional Servicing Report Fee of \$515 is required as per the current Fees By-law

Regional Roads And Storm Water Requirements

- The Region of Peel has an Environmental Compliance Approval (9582-B9TRLW) for the Regional Municipality of Peel Stormwater Management System. Therefore, it is the Region's mandate that no additional flows are permitted and no new connections are made to Regional Roads.

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- Development flows are to be directed to the Local Municipality's storm sewer system or watercourses, to the satisfaction of the Region of Peel, the local Conservation Authority and all concerned departments and agencies. Alternatively, flows can be mitigated using Low Impact Development Technologies. Developers are required to demonstrate how this will be achieved through a Stormwater Management Report.
- No grading will be permitted within any Region of Peel ROW to support adjacent developments
- Grading and Drainage approval by the Region of Peel is required prior to Site Plan Approval
- A copy of the draft reference plan satisfactory to Traffic and Legal will be required prior to site plan approval
- We have received the SWMR dated 2022-01-11 and prepared by Urbanworks Engineering Corporation/Michael Paulo, P.Eng The Report is satisfactory in principal.
- The Region will require a satisfactory Stormwater Management Report prior to Site Plan Approval
- Prior to Site Plan approval, Grading and Drainage drawings are required for Review by Servicing Connections
- Please refer to the Region's Storm Water Management Report Criteria within the Functional Servicing and Stormwater Management Report document found on-line
- Prior to OZ/RZ approval the non-refundable Stormwater Management Report Fee of \$515 is required as per the current Fees By-law

Legal Comments

- Condominium Water Servicing Agreement may be required prior to Condominium Registration
- The applicant is required to provide to the Region copies of all registered easements affecting the subject lands prior to OZ/RZ approval
- The applicant is required to provide to the Region with copies of the most current PINS. Prior to Site Plan Approval Further comments/requirements will be provided once the PINS are reviewed by a Regional Law Clerk

Water Servicing

- An existing 400 mm diameter water main is located on Columbia Way (Pressure Zone 6)
- This proposal requires connection to a minimum municipal watermain size of 300mm (Watermain Design Criteria 2.1)
- It is required that a subject site connects to the municipal watermain(s) within the pressure zone designated for the lands, connection to correct zone will be confirmed during modeling.
- Servicing of this site may require municipal and/or private easements and the construction, extension, twinning and/or upgrading of municipal services. All works associated with the servicing of this site will be at the applicant's expense. The applicant will also be responsible for the payment of applicable fees, DC charges, legal costs and all other costs associated with the development of this site.

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- For this type of development proposal, we recommend, where possible, the consideration of a domestic water and fire system looped to municipal water, to provide a redundant water supply
- This development proposal requires a water system looped to municipal water, to provide a redundant water supply, as per standard drawing
- All unutilized water and sanitary services shall be disconnected and/or abandoned in accordance with Region of Peel standards and specifications.

Sanitary Sewer Servicing

- An existing 250 mm diameter sanitary sewer is located on Kingsview Dr. Servicing of this site may require municipal and/or private easements and the construction, extension, twinning and/or upgrading of municipal services. All works associated with the servicing of this site will be at the applicant's expense. The applicant will also be responsible for the payment of applicable fees, DC charges, legal costs and all other costs associated with the development of this site.
- All unutilized water and sanitary services shall be disconnected and/or abandoned in accordance with Region of Peel standards and specifications.

General Servicing Comments

- All our design criteria, standards, specifications, procedures and report and submission requirements are found on-line at <https://www.peelregion.ca/public-works/design-standards/#procedures>
- Please refer to Section 3 of our Site Plan Procedure document found on-line
- Please refer and adhere to the Regional by-laws that are applicable to your proposal, such as but not limited to the Water, Wastewater and Backflow Prevention by-laws <https://www.peelregion.ca/council/bylaws/archive.asp>
- Please refer to the Latest Fees Bylaw. All fees may be subject to change on annual basis pending Council approval.
- Please refer to our Standard Drawings on-line to determine which standards are applicable to your project.
- If you have questions regarding the Site Servicing Application Submission Requirements, please contact Servicing Connections at siteplanservicing@peelregion.ca
- Servicing for the proposed development must comply with the Local Municipality's Requirements for the Ontario Building Code and most current Region of Peel standards
- Should the tenure change to condominium(s), please notify us if the servicing drawings are revised to reflect the Local Municipality's Requirements for the **Ontario Building Code**. We may have additional comments and requirements

Traffic Development Comments:

Access and Studies

- The Region requests that a functional design be included as part of the next submission due to the new development consisting of over 100 veh/hr in the peak hour according to the RCS we will require an auxiliary turn lane for the access proposed off of Highway 50 and must meet the TAC requirements.
- The Region finds the growth rates and trip generation rates satisfactory and meet the ITE requirements.

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- The Region of Peel will require one (1) copy to be in electronic format and one (1) hard copy complete with the appropriate supporting documentation. This shall be submitted to the Traffic and Transportation Engineering section of Public Works Department for our review, comment and approval.
- In addition, the below link also contains additional links. [Traffic impact study - Region of Peel \(peelregion.ca\)Controlled Access By-law Road Characterization](#)

Property Requirements

The below comments are informational at this time. Land dedication and submission of the associated Draft R-Plan will be required at the Site Plan Approval Stage.

- The Region requests the gratuitous dedication of lands to meet the Regional Official Plan requirement for Regional Road 50 (Highway 50) which has a right of way of $36 + 5.5 = 41.5$ metres, 20.75 metres from the centreline of the road allowance,
- The Region will require the gratuitous dedication of a 0.3 metre reserve along the frontage of Regional Road 50 (Highway 50) behind the property line.
- A 15x15 m daylight triangle at the intersection
- The applicant is required to gratuitously dedicate this land to the Region, free and clear of all encumbrances. The applicant must provide the Region with the necessary transfer documents and deposited reference plan(s) to confirm the Region's ownership. All costs associated with preparation of plans and the transfer of the lands will be solely at the expense of the applicant;

Waste Management Comments:

This site is not within the vicinity of a landfill.

Phase 1A:

The Region of Peel will provide curbside collection of garbage, recyclable materials, household organics and yard waste subject to Section 2.0 and 3.0 of the Waste Collection Design Standards Manual (WCDSM) and the following conditions being met and labelled on the Site Plan:

- Internal roadways must be constructed of a hard surface material, such as asphalt, concrete or lockstone, and designed to support a minimum of 35 tonne, the weight of a fully loaded waste collection vehicle.
- The maximum grade permitted along the waste collection vehicle access route is 8 percent.

Phase 2:

The Region of Peel will provide **front-end collection** of garbage and recyclable materials subject to the following conditions being met and labelled on a **Waste Management Plan** prior to the Official Plan Amendment approval:

Waste Collection Vehicle Access and Egress Route

- A **minimum 18 meters straight head-on approach** to Collection Point is required. This is measured from the front of the first bin staged for collection and must be labelled.
- Stop signs on the roadway by the loading bay to stop traffic
- A convex mirror on the wall opposite the loading bay to assist both the truck and oncoming traffic with a better field of vision

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Collection Point Requirements

- **Overhead clearance at the Collection Point** – A minimum of 7.5 metres from the concrete pad is required at the Collection Point. The clear height of 7.5 metres is free of obstructions such as sprinkler systems, ducts, wires, trees, or balconies. **This must be shown and labelled on subsequent revised submissions.**
- The Collection Vehicle must wholly fit in the Collection Point during collection. The Collection Point must have a **minimum length of 18 meters** for the Waste Collection Vehicle to avoid impacting the flow of traffic in the roadway. The collection point must also have a min. width of 6m.
- The **Collection Point** must show **sufficient space** for the staging of all bins of a single stream, whichever is larger (Garbage or Recyclable materials) and setting-out of Bulky Items (minimum 10 square meters).
- The **number, size, and type of receptacles** in the **Collection Point** must be clearly labelled.
- The **Collection Point** should not require the jockeying of front-end bins (i.e. manually positioning one front-end bin at a time for the waste collection vehicle to pick up) by property management staff. Please see **Appendix 4 of the WCDSM – Waste Collection Design Standards Manual** for suggested positioning of bins.

If jockeying of bins during collection is required, please indicate on the waste management plan that property management staff will be responsible for jockeying the bins during collection, subject to the following requirements:

- a. The bins should be properly positioned in the collection area on the day of collection before 7 am.
- b. The driver is not required to exit the collection vehicle to facilitate collection.
- c. Property management is responsible for moving bins during collection.
- d. The Region will not be responsible for emptying bins that are inaccessible to the collection vehicle.
- e. Property management must be visible to waste collection vehicle on approach to site, otherwise the waste collection vehicle will not enter the site.
- f. Property management will be responsible for safely maneuvering waste collection vehicles into and/or out of, as well as around the site

Phase 3:

For the Retail units: Retail waste must be set out separate from residential waste and **clearly labelled** on the site plan.

Residential units are eligible for Front-End waste collection provided that requirements in Sections 2.0 and 4.0 of the Waste Collection Design Standards Manual are met on the site plan:

- The collection area should not require the jockeying of front-end bins (i.e. manually positioning one front-end bin at a time for the waste collection vehicle to pick up) by property management staff. The Region of Peel strongly discourages waste collection area designs that rely on property management staff to move front-end bins during waste collection.

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tel: 905-791-7800

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- However, where all reasonable attempts have been undertaken and these requirements cannot be met, reliance on property management staff to facilitate waste collection will be considered at the Region's discretion subject to the following requirements:
 - 1) The bins should be properly positioned in the collection area on the day of collection before 7 am.
 - 2) The driver is not required to exit the collection vehicle to facilitate collection.
 - 3) Property management is responsible for moving bins during collection.
 - 4) The Region will not be responsible for emptying bins that are inaccessible to the collection vehicle.
 - 5) Property management must be visible to waste collection vehicle on approach to site, otherwise the waste collection vehicle will not enter the site.
 - 6) Property management will be responsible for safely maneuvering waste collection vehicles into and/or out of, as well as around the site.
- **Please indicate on the site plan that property management staff will be responsible for moving bins to the staging area at the time of collection and returning to storage room following collection.**
- The Waste Collection Vehicle access route throughout the complex indicating turning radii and turning movements is to be **clearly labelled** on the drawing.
- Internal roadways must be constructed of a hard surface material, such as asphalt, concrete or lockstone, and designed to support a minimum of 35 tonnes, the weight of a fully loaded waste collection vehicle.
- All roads shall be designed to have a minimum width of **6 metres**.
- The Turning Radius from the centre line must be a **minimum of 13 metres on all turns**. This includes the turning radii to the entrance and exit of the site.
- The waste collection vehicle access route throughout the complex indicating turning radii and turning movements is to be **clearly labelled** on the drawing according to **Sections 2.0 and 4.1** of the Waste Collection Design Standards Manual.
- A min. 18m straight head on approach to the collection point is required. This is measured from the front of the 1st bin staged within the **collection point**.
- The min. width required for collection point is 6m.
- The internal waste storage area must be large enough to contain all the required number of front-end bins for garbage and carts for recycling to allow for easy movement of the bins.
- The Collection Point must also show 10 square meters for the set-out of Bulky Items.
- Stop signs are required on the roadway by the loading bay to stop traffic.
- A convex mirror is also required on the wall opposite the loading bay to assist both the truck and oncoming traffic with a better field of vision.

Waste Storage Room:

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- All required Front-end bins of both streams must be shown in the Waste Storage Room depicted on drawing.
- The number, size, and type (Garbage/ Recyclable Materials) of Front-end bins must be labelled.
- The calculation showing the required number of Front-end bins must also be labelled. Please refer to WCDSM Appendix 6 Front-end Garbage and Recycling Bins and Appendix 7 Waste Bin Calculations.
- The Waste Storage Room must also show 10 square meters for the storage of Bulky Items.
- If present, the location of the compactor must be shown and labelled.

At the site plan stage, all requirements on Section 2.0 and 4.0 of the Waste Collection Design Standards Manual must be adhered to including those above.

For more information, please consult the Region of Peel Waste Management Plan for Official Plan Amendment / Rezoning Application available at: <https://www.peelregion.ca/planning/business/pdf/waste-management-plan.pdf> and the Waste Collection Design Standards Manual available at: <https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf>

Sustainable Transportation and Public Health Comments

STSI Comments

Sustainable Transportation Strategy recognizes and identifies Peel's role to build awareness relating to sustainable modes of commuting, such as carpooling, transit, telework, walking and cycling. TDM/AT has a vital role in the design of urban environments and its influence on travel choices. Some of the outcomes that the Region of Peel – STSI (Sustainable Transportation and Strategic Initiatives) aims to achieve by integrating TDM/AT and development to provide a more attractive streetscapes that are inclusive and inviting for everyone: motorists, pedestrians, and cyclists; and promotes a healthy and active lifestyle. STSI offers the following recommendations for future iterations of this site.

- Recognize that developer participated in the Region's Healthy Development Assessment and scored a 15/20
- Consider installing visible, well-lit bicycle parking for visitors (short term parking) near the main entrance. Typically, 1-5 bicycle parking spaces can substitute for a parking space, up to a maximum of 25-30% of total required parking spaces
- Provide bicycle parking spaces equivalent to the expected number of commuter cyclists (assuming the cycling mode share target is met), plus the expected peak number of customer/visitor cyclists.
- Provide bicycle parking in highly visible and lighted areas, sheltered from the weather wherever possible.
- Provide secure bicycle parking spaces equivalent to at least the number of units at condominiums or multi-family residential developments.
- Ensure that bicycle parking spaces and access aisles meet minimum dimensions; and that no more than 50% of spaces are vertical spaces; and that parking racks are securely anchored.
- Recommend the provision of lighting, landscaping and benches along walking and cycling routes between building entrances and streets, sidewalks, and trails

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- Suggest the installation of EV (Electric Vehicle) charging stations for micro-mobility devices (e-scooter, e-bike, e-car) in public spaces and designate micro-mobility parking areas so devices do not impede the pedestrian clearway.
- Suggest a permanent bike repair station, with commonly used tools and an air pump, adjacent to the main bicycle parking area (or secure bicycle parking area, if provided).
- Ensure that walking routes to transit stops are secure, visible, lighted, shaded and wind-protected wherever possible
- Provide sidewalk and cycling route connections (curbs are cut) through the property and suggest confirming lighting conditions meet current standards for pedestrian/cycling ways and walkways to make walkers/cyclists visible to vehicle users and provides a safer environment.
- Suggest making sidewalks and open space areas easily accessible through features such as gradual grade transition, depressed (cut) curbs at street corners and convenient access to extra-wide parking spaces and ramps.
- Recommend wayfinding signage for site access (where required, e.g., when multiple buildings or entrances exist) and egress (where warranted, such as when directions to reach transit stops/stations, trails or other common destinations are not obvious).
- Considering the installation of preferential parking options for commercial use staff.
- Consider further parking reductions applied by providing an incentive to commercial staff to provide Transit Discount cards to promote the use of local transit.
- Consider providing showers and changing facilities for the use of active commuters, regarding commercial use properties
- It is suggested to sell/lease parking spaces separately from units. This ensures less of an incentive for residents to own/use a vehicle. The Peel Healthy Development Assessment guide suggests providing unbundled parking for 50% of dwellings within 400 m (about 1312.34 ft) of a transit stop.
- Provide shelters, lighting and benches at any on-site transit stops

Public Health Comments

Public Health does not have any objections to the proposed Official Plan and Zoning By-Law Amendment application.

A Healthy Development Assessment was submitted and score of 15 was achieved (Silver Level). This demonstrates that the proposal is on its way to contributing to a healthy built form.

The following are our recommendations:

- Consider short term bicycle parking near building entrances and long-term secure bicycle parking for residents
- Encourage landscaped walkways with pedestrian scaled lighting within the site
- Where feasible, consider incorporating porous/permeable surfaces or light-coloured materials instead of black asphalt to mitigate negative aesthetic and environmental impacts
- Recommend a 2m wide sidewalk adjacent to 8 storey residential building along Highway 50 and Columbia Way frontages
- Recommend 1.5m wide sidewalks along townhouse unit frontages

- Consider age friendly development guidelines when designing spaces for multi-generational use

For further questions or concerns please contact the undersigned at 905-791-7800, extension 7921, or by email at: dylan.prowse@peelregion.ca



Dylan Prowse,
Junior Planner, Development Services

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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April 22, 2024

Eric Lucic
Commissioner, Planning and Development
Town of Caledon
6311 Old Church Road
Caledon ON L7C 1J6
eric.lucic@caledon.ca

Public Works

10 Peel Centre Dr.
Suite B
Brampton, ON
L6T 4B9
tel: 905-791-7800

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**RE: Caledon Strong Mayor Powers – Proposed Zoning By-law Amendment
Lands Between Centreville Creek Road and The Gore Road, Between Mayfield
Road and Healey Road, Town of Caledon
Town File Number: RZ 2024-0005C (Area A11)
Region File Number: RZ 24-005C**

Dear Eric,

On April 4, 2024, the Region received a request for comments on a proposed Zoning By-law Amendment to implement the use of Strong Mayor Powers for the lands between Centreville Creek Road and The Gore Road, between Mayfield Road and Healey Road. As part of the request for comments, the Region received a copy of the Notice of Application and Public Meeting, as well as correspondence from Loopstra Nixon to the Clerk which included a copy of the proposed Zoning By-law Amendment.

On April 17, 2024, the Region received a request for comments with a revised copy of the proposed Zoning By-law Amendment for the same lands.

The proposal will create a new community with a variety of land uses through the rezoning of lands from Agricultural (A1), Rural Residential (RR) and Environmental Policy Area 2 Zone (EPA2) to various site-specific zones permitting residential, commercial, mixed-use and environmental protection land uses.

Application is Premature

The Region of Peel suggests that this By-law is premature without comprehensive planning (i.e. Secondary Planning) supported by technical studies (i.e. subwatershed study, servicing study, transportation study, stormwater management study, etc.) and a Growth Management and Phasing Plan being supported by Council. While some infrastructure exists in the area, without understanding the planned density, there may be a lack of infrastructure (i.e. an adequate transportation/transit network, etc.) being available to the service the development. In undertaking these planning exercises, all stakeholders would collaborate to ensure that the community will be a well-planned and sustainable community with a variety of land uses (including housing types and affordable housing types), community infrastructure (including schools, parks, recreation centres, emergency services, matters of public health, etc.) and hard infrastructure (such as water and wastewater services, stormwater management and a road/transit network). Furthermore, should

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L6T 4B9
tel: 905-791-7800

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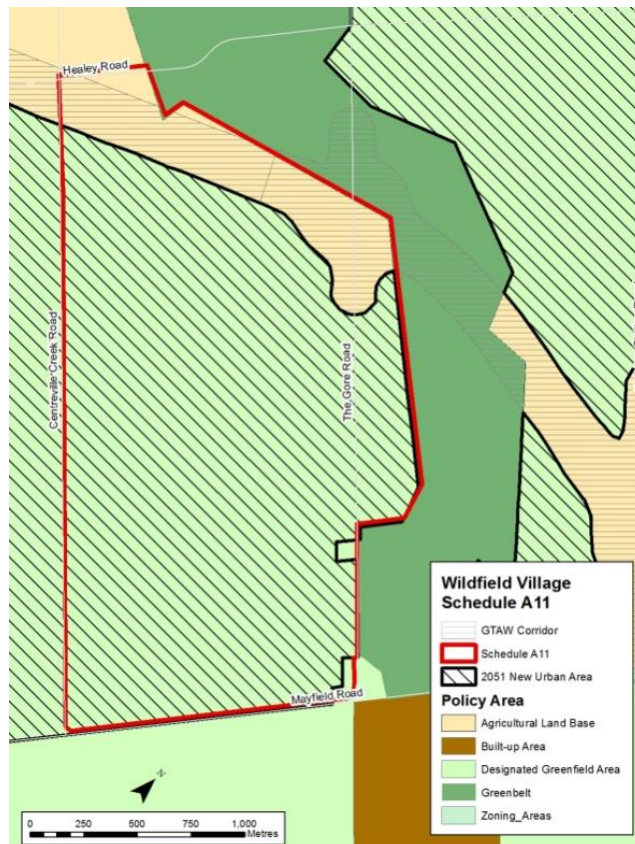
additional infrastructure improvements be required, further discussions on the financing of those services is also required to ensure fiscal responsibility for the Town and Region. Finally, the By-law as circulated contains a number of areas of concern and lacks some clarity, zoning standards and holding provisions.

While the Region is a supportive partner in addressing the housing crisis and delivering affordable housing, without fundamentals such as servicing in place, houses cannot be constructed regardless of the approval of a Zoning By-law Amendment.

Despite the prematurity of this application, the Region is committed to working with our municipal partners and has provided additional comments and requests holding provisions as outlined for your review and consideration below. These will help address some of the application's prematurity concerns.

Rural System – Lands Outside of the 2051 New Urban Area

The proposed Zoning By-law Amendment proposes to rezone lands outside of the 2051 New Urban Area, within the Rural System, for urban (residential) land uses – see image below.



In accordance with the current, in effect, Planning legislation, a municipal comprehensive review (a Regional Official Plan Amendment) is required to expand the Urban System prior to the lands being rezoned. The proposed Zoning By-law Amendment does not conform to the Regional Official Plan.

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2051 New Urban Area

Through the adoption of the Region of Peel Official Plan*, the subject lands were brought into the Regional Urban Boundary and are identified as 2051 New Urban Area. The 2051 New Urban Area is approximately 4,646 net hectares, comprised of 1,584 net hectares of employment lands and 3,062 net hectares of community (i.e. residential) lands.

The Zoning By-law Amendments (A1 to A8 and A11) proposed through Strong Mayor Powers will rezone a significant portion of the New Urban Area which is designated for development to 2051. Cumulatively, these By-laws will rezone approximately 26% (1,185 net hectares) of all lands within the 2051 New Urban Area and approximately 39% (1,185 net hectares) of the community lands. Individually, this Zoning By-law Amendment will rezone 331 net hectares which results in 7% of all lands within the 2051 New Urban Area and 11% of the community lands.

Town of Caledon staff were partners in preparing the newly adopted Regional Official Plan* and provided comments and input in the development of the Plan and its policies.

For lands within the 2051 New Urban Area, the Regional Official Plan* requires Secondary Plans and Block Plans, as well as that development applications be received and approved to permit development of these new communities.

The Regional Official Plan* policies require that certain matters be addressed prior to approving secondary plans, including the need for Phasing Plans to stage development, a need for a connected transportation system, technical studies such as scoped Subwatershed Studies, Functional Servicing Reports, as well as additional studies required by the Town related to undertaking secondary planning. The Region has not received notice of a proposed Secondary Plan application which includes the required supporting material. The requirements of the 2051 New Urban Area policies have not been satisfied.

The proposed Zoning By-law Amendment (as circulated by the Town) will not conform to the Region of Peel Official Plan* however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters.

**As announced on April 10, 2024, as of July 1, 2024, the Region's statutory powers under the Planning Act will be removed. Once in effect, planning policy and approval responsibilities of the regional municipality will be removed and the lower-tier municipalities will assume primary responsibility for all planning in their geographies, except for matters requiring provincial approval. Instead, per section 70.13(2), the Region's official plan will be deemed to constitute the official plan of the Town of Caledon, and conformity will still be required until such time as Caledon amends it and approval is provided by the Province. Therefore on July 1, 2024, the current Region of Peel Official Plan will become the Town of Caledon Official Plan and shall be implemented by the Town of Caledon.*

Town of Caledon Growth Management and Phasing Plan

The Region of Peel Official Plan* requires that the Town complete and implement a phasing plan for the entirety of the 2051 New Urban Area: the Town's Growth Management and

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Phasing Plan (GMPP). While the Region has reviewed a draft of the GMPP, it has not been finalized.

As part of the development of the draft GMPP, the Region worked collaboratively with the Town to identify the opportunities and constraints for the 2051 New Urban Area, especially as it related to transportation and servicing. The results of those discussions and findings were to be incorporated into the GMPP. To date, the Region has not found the GMPP to be satisfactory and reflect the requirements of the phasing plan as well as the outcomes on the opportunities and constraints. This matter remains outstanding. The Town has not finalized or received Council endorsement on a Growth Management and Phasing Plan.

The overall development of the 2051 New Urban Area, including the lands subject to this By-law, is to occur in accordance with this future Growth Management and Phasing Plan that is satisfactory to the Region of Peel.

Servicing Constraints

A significant concern of the Region's is that there is insufficient capacity in the Regional water and wastewater systems (from our plants to more local mains) to accommodate this proposed community at this time pending completion of the ongoing Water and Wastewater Servicing Master Plan and approved capital projects as identified in the approved Water and Wastewater Capital Budget. Significant upgrades and additional watermains and sanitary sewers are required to service this community both in the local vicinity of this development and within the entire water and wastewater system. These projects include expansions to water treatment plants, new water transmission pipelines, upgrades and expansions to water pumping facilities and reservoirs, new large sanitary conveyance pipelines and wastewater treatment facilities. The majority of these will require multi-year design and construction efforts to complete. The Region currently estimates that the service upgrades and extensions are estimated to cost over \$6.2B for water and \$6.7B for wastewater for the housing pledges alone.

The Growth Management and Phasing Plan and the studies outlined above are required for the 2051 New Urban Area, are essential for the Region to plan for service delivery. The completion of these documents to the Region's satisfaction is imperative in order to deliver servicing infrastructure in an efficient and financially sustainable manner.

In working collaboratively with the Town, the Region is advancing servicing for the four priority areas identified by the Town in 2023 – Macville, Wildfield, Tullamore employment area and the Mayfield West Phase 2, Stage 3 lands. The lands subject to the proposed Zoning By-law Amendment, Wildfield, is included in these priority areas. In the meantime, the Region is working to finalize an update to the infrastructure master plan that will identify servicing needs and the timing of service availability for the balance of the New Urban Area, which will need to align with the Town's Growth Management and Phasing Plan.

The Region is advancing servicing infrastructure within the Town's borders and upstream and downstream to support all Bill 23 municipal pledges.

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Housing Pledge

Based on previous conversations with the Town, the Region understands that these lands are not required and have not been identified as being necessary to meet the Town's Housing Pledge of 13,000 units by 2031.

Development Application Status

The Region has not been notified of receipt of a *Planning Act* application for these lands, with the exception of this application. The Region has been involved in a pre-consultation process for proposed applications; however, we understand that a formal application(s) has not been received.

Specific Comments on the Proposed Zoning By-law

Request for Amendments to the Proposed Zoning By-law

In reviewing the proposed Zoning By-law Amendment, Regional staff request the following be included in the By-law:

- Prior to the approval of the Zoning By-law, the area to be rezoned shall be amended to be entirely within the 2051 New Urban Area limits.
- The environmental limits on a site-specific basis have not been examined or substantiated through detailed Environmental Studies, so the limits of the proposed EPA1 zone cannot be validated. However, as part of the Region of Peel Official Plan*, the Greenlands System (which includes all Provincial Natural Heritage System designations and overlays, Core Areas of the Greenlands System, Natural Areas and Corridors and Potential Natural Areas and Corridors) was reviewed and is identified in Schedule C-1 of the Region of Peel Official Plan*.

As part of the Planning process, it is common for the environmental limits to be refined as more granular environmental studies are completed. As the more detailed supporting studies have not been completed and submitted for review, the limits of the EPA1 zone should be amended to include the Natural Heritage System as depicted on Schedule C-1 Greenlands Schedule of the Region's Official Plan*. It currently does not.

Although Zoning By-laws are typically regulatory in nature, the proposed By-law currently indicates that the limits of the EPA1 zone can be refined through the processing of further development applications. This text would support the ability for the environmental limits to be more broadly captured at this stage (based on Schedule C-1) and then refined through studies, where appropriate, at a later stage. This would more closely resemble the process of how environmental systems are identified and protected through the overall planning process.

- In accordance with Region of Peel policy 5.4.19.7, development within the Designated Greenfield Area shall be designed to meet or exceed a minimum density

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tel: 905-791-7800

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of 67.5 residents and jobs combined per hectare. The Region encourages the Town to include a standard reflecting the area's minimum density target.

For additional information, to inform the ongoing planning process for these lands, the Town will need to ensure an upfront plan is in place to meet the density (through secondary plans) and a monitoring plan is to be in place to track density as the applications are received across the Designated Greenfield Area.

- The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options. Typically, though the Secondary Planning and Block Planning exercises affordable housing options are considered and related policies implemented. All stakeholders should be working together to ensure that an array of housing options is available, and that affordable housing is provided within the community. As Secondary Planning and Block Planning has not occurred for this community, the specifics with respect to type and tenure of housing options (including affordable housing) are unknown.

While the Region is supportive of ensuring a broad array of housing types and tenure are available, it is not best practice to isolate housing tenure in such a way as the definition of “Non-Market Housing”, unless there is no other way. In reviewing the various housing typology definitions in the Town’s Zoning By-law, it is not clear that the distinction of tenure in such a way is warranted. The Region would encourage the Town to look at the types of housing permitted (i.e. apartment building, detached dwelling, townhouse dwelling, etc.) and define these unit types in that manner instead. Should the Town continue to define and permit this use, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for this use. The definition is missing from the RMD-X3 zone.

- The Region is encouraging the Town to permit a variety of housing unit types in the By-law. The Town should review the existing By-law to identify other unit types permitted elsewhere in the Town which could be added to the By-law. An example would be to include back-to-back stacked townhouses. Should additional uses be added, zone standards (i.e. setbacks, building height, etc.) should be incorporated into the By-law for those uses.

The Region would also encourage permitting a Multiplex as a use with the appropriate standards in the RMD-X2 zone. This same zone permits townhouses and apartment buildings.

- The applicant is encouraged to explore the opportunity for locating a licensed childcare centre within the proposed development. The Region notes that Day Nursery is not a permitted use within the RMD-X1 and RMD-X2 zones. In addition, a Private Home Day Care is not permitted within the RMD-X2 zone. The Region would encourage the Town to consider adding these uses.

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- With more urban forms of development, it is common to see an increase of rear lanes, private roads, etc. These street types often come with reduced right-of-way widths which has proven to be a challenge for waste management collection vehicles. These vehicles require a minimum right-of-way width of 6 metres and the vehicles can only collect from the right-side of the vehicle. There is also a turning radius for these vehicles which must be designed for too. Regional staff note that the proposed Zoning By-law Amendment identifies lanes and therefore are requesting that Town staff consider adding a standard to the RMD-X2 and RMD-X3 zones which requires a minimum width of 6 metres for a private road/street or lane.
- In Paragraph 2 of the By-law, when referencing the zones the lands are to be rezoned to, reference should be made to the full zone including the Holding.

With respect to the statement that minor adjustments to the zone boundaries can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

- Paragraph 3 of the By-law refers to the date that the By-law shall come into full force and effect. This date is proposed to be the date that the Future Caledon Official Plan (or the portions thereof affecting the lands shown on the schedule to the By-law) comes into full force and effect.

In the circulation dated April 17, 2024, Town staff indicate in the email: “Please note that except for A10, all of the applications will require the completion of secondary plans with supporting studies, to conform to the Official Plan”. This is not specified anywhere within the By-law. If the Town intends on requiring Secondary Planning, this should be indicated through a Holding provision in the proposed Zoning By-law Amendment. The Region has asked for this provision.

However, in noting that Town staff intend on requiring a Secondary Plan for these lands (although not expressed in the By-law) and noting that there is a paragraph of the By-law which delays the date that the By-law comes into full force and effect, Region of Peel staff request that this provision of the By-law (paragraph 3) be amended to reflect the date a Secondary Plan for the community is in full force and effect.

Alternatively, rather than bringing forward the By-law for approval on April 30, 2024 as intended, the Town could bring forward the By-law after the Future Caledon Official Plan and Secondary Plan are in full force and effect and therefore the provision would not be required.

Request for Holding Provisions

The Region is requesting Holding (H) provisions be applied to the entirety of the lands subject to RZ 2024-005, by applying a Holding to each of the zones: RMD-X1-H-XX, RMD-X2-H-XX, RMD-X3-H-XX and EPA1-H-XX.

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tel: 905-791-7800

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While at first glance it may appear that the EPA1-H-XX zone would not warrant an “H”, the limits of the EPA1-H-XX zone likely do not reflect the boundaries of the environmental lands as explained in this letter.

As outlined above, although Town staff have indicated that a Secondary Plan would be required for these lands, it has not been included as a Holding provision in either version of the proposed Zoning By-law Amendment the Region has reviewed.

The existing Holding provisions in the proposed Zoning By-law Amendment do not sufficiently address the requirements to be satisfied prior to the Holding symbol being lifted. In addition, the timing of the Holding condition 4.a. is unclear:

- Does “approval of Draft Plan of Subdivision has been issued” mean draft approval or does it mean approval of the M-Plan?
- The status related to Site Plan described as “a Site Plan Approval – Final Summary Letter” is not a status under the *Planning Act* and can be loosely interpreted or may become null if the Town choose to improve its Site Plan Approval process.
- With respect to the statements that Environmental Policy Area zone can be adjusted, how would public agencies, the public, stakeholders, etc. learn of this adjustment and the changes to zoning such as permitted uses and standards and how does this affect enforcement?

In consideration of the lack of Secondary Planning, Block Planning and development applications, together with supporting material and completion of the Growth Management and Phasing Study, the Region is requesting a number of holding provisions to ensure that the community is developed effectively. The requested holding provisions are summarized at a high level below, with their specific content identified further in this letter:

- The first holding provision (comprised of subsections 1.a to 1.f) ensures that a Secondary Plan is completed, and submitted with the supporting information required in Region of Peel policy 5.6.20.14.17*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- The second holding provision ensures that a Block Plan is completed in accordance with Region of Peel Official Plan policy 5.6.20.12)*. Recognizing that the planning authority will change as of July 1, 2024, it is not necessary that the Region be included as being a “satisfied” party in this condition.
- Recognizing the importance of Regional service delivery, the third holding provision (comprised of subsections 3.a and 3.b) ensures that the Town’s Growth Management and Phasing Plan (GMPP) is found to be satisfactory to the Region, receives Council endorsement and that the proposed secondary plan and further planning approvals reflect the GMPP. Similarly, the fourth holding provision ensures that the satisfactory Development Staging and Sequencing Plan for the Secondary Plan area is found to be satisfactory to the Region and that the proposed secondary plan and further planning approvals reflect the Plan.
- The fifth holding provisions looks to ensure that financial obligations required to deliver this community is shared among stakeholders appropriately.

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- The sixth holding provision (comprised of subsections 6.a to 6.d) speaks to the requirements for delivering water and wastewater services in a timely, financially sustainable and effective manner.
- The seventh holding provision (comprised of subsections 7.a to 7.h) speaks to the requirements for ensuring a successful transportation network, including Regional roads and transit delivery.
- The eighth holding provision seeks to ensure that lands required for the delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing, are dedicated to the Region.
- The four last remaining holding provisions (9, 10, 11 and 12) require the submission of supporting studies required to be determined satisfactory by the Region to support development applications: Noise Assessment (adjacent to Regional roads), Healthy Development Assessment, Stormwater Management Report and Waste Management Plan.

The zone schedule is to be amended to include reference to the Holding symbols.

As the proposed Zoning By-law Amendment does not reflect the Town’s formatting of a Zoning By-law Amendment, and more specifically, the formatting of Holding (H) provisions as per Section 13.3 of the Town’s Zoning By-law, the Region has provided our requested H provisions in the same format as Section 13.3.

<i>Zone Designation</i>	<i>Location</i>	<i>Conditions for Removal</i>
RMD-X1-H-XX RMD-X2-H-XX RMD-X3-H-XX EPA1-H-XX	[to be inserted]	<p>Until such time as the Holding Symbol is removed, no person shall <i>use</i> the lands to which the letter (H) applies for any <i>use</i> other than the <i>use</i> which legally existed on the effective date of this By-law.</p> <p>With respect to the lands <i>zoned</i> RMD-X1-H-XX, RMD-X2-H-XX, RMD-X3-H-XX and EPA1-H-XX the Holding “H” Symbol shall not be removed until such time as:</p> <ol style="list-style-type: none"> 1. The Owner has submitted and received approval of a Secondary Plan, which: <ol style="list-style-type: none"> a. Includes any policies and recommendations of an Agricultural Impact Assessment, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); b. Includes any policies and recommendations of a Community Energy and Emissions Reduction Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy

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		<p>5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>c. Includes any policies and recommendations of a Climate Change Adaptation Plan, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>d. Includes any policies and recommendations of a Detailed Subwatershed Study (including the designation of the natural heritage system), submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024);</p> <p>e. Includes any policies and recommendations of an Area-Specific Environmental Implementation Report, submitted in support of the Secondary Plan and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.17 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); and,</p> <p>f. Includes any policies and recommendations of a Housing Assessment, submitted in support of the Secondary Plan and any development or <i>Planning Act</i> applications with more than 50 residential units and prepared in accordance with Region of Peel Official Plan policy 5.6.20.14.11 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>2. The Owner has submitted and received approval of a Block Plan, in accordance with Region of Peel Official Plan policy 5.6.20.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024).</p> <p>3. The Owner has received written confirmation from the Region of Peel that the Town-wide Growth Management and Phasing Plan has been:</p>
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		<ul style="list-style-type: none"> a. Completed to the satisfaction of the Region of Peel and endorsed by Town of Caledon Council; and, b. Implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s). <p>4. The Owner has received written confirmation from the Region of Peel that the following documents a satisfactory Development Staging and Sequencing Plan for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s).</p> <p>5. The Owner has received written confirmation from the Region of Peel that the required financing agreements and arrangements have been made to the satisfaction of the Region of Peel for cost-sharing and financing of Regional infrastructure.</p> <p>6. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Servicing Report for the Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s); b. a satisfactory site-specific detailed Functional Servicing Report has been received and implemented for any required development or <i>Planning Act</i> application; c. a development agreement has been executed with the Region of Peel to implement the required water and sanitary sewer services, which may include the payment of fees and posting of required securities; and, d. there is sufficient municipal water and sanitary sewer capacity to service the lands. <p>7. The Owner has received written confirmation from the Region of Peel that:</p> <ul style="list-style-type: none"> a. a satisfactory Transportation Study for the
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		<p>Secondary Plan area has been received and implemented in the Secondary Plan policies as well as any other required development or <i>Planning Act</i> application(s);</p> <ul style="list-style-type: none"> b. A satisfactory site-specific detailed Traffic Impact Study has been received and implemented for any required development or <i>Planning Act</i> application; c. The Transportation Study and/or Traffic Impact Study have demonstrated a connected transportation system in accordance with Region of Peel policy 5.6.20.14.12 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); d. Where more than 10,000 residential units have been approved for development in the 2051 New Urban Area as identified in the Region of Peel Official Plan (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024), the jurisdiction and financing mechanisms to support a complete local transit system are in place in accordance with Region of Peel policy 5.6.20.14.13 (to be transitioned to be the Town of Caledon Official Plan on July 1, 2024); e. a development agreement has been executed with the Region of Peel to implement the required Regional road improvements (including intersections with Regional roads), which may include the payment of fees, posting of required securities and dedication of roads, widenings, 0.3 m reserves and other lands; f. there is sufficient capacity on the Regional road network to service the lands; g. the proposed road network (public and private) and accesses to Regional Roads are satisfactory; and, h. that stormwater is not directed onto Regional roads in accordance with Regional policies. <p>8. The Owner has received written confirmation from the Region of Peel that satisfactory arrangements for the dedication of any lands</p>
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		<p>(including fees and costs) to the Region of Peel for the required delivery of Regional services, including public health, emergency services, transportation, water and wastewater services and affordable housing.</p> <p>9. The Owner has received written confirmation from the Region of Peel that, where the lands subject to a development application abut or are within 300 metres of a Regional Road, a satisfactory noise report has been received and the recommendations of the noise report have been implemented through the development application.</p> <p>10. The Owner has received written confirmation from the Region of Peel that, a satisfactory healthy development assessment has been received and the recommendations of the assessment have been implemented through the development application.</p> <p>11. The Owner has received written confirmation from the Region of Peel that, a satisfactory Stormwater Management Report has been received and the recommendations of the report have been implemented through the development application.</p> <p>12. The Owner has received written confirmation from the Region of Peel that, a satisfactory Waste Management Plan has been received and the recommendations of the report have been implemented through the development application.</p>
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Advisory Comments

Regional staff offer the following advisory comments on the content of the proposed Zoning By-law:

- There appears to be zone provisions which would restrict the parking of motor vehicles in the driveway of dwellings located within the RMD-X2 zone. In addition, there does not appear to be parking rates established for Non-Market Housing or Multiplex. With the proposed restriction and silence on parking rates, together with a limited public transit network, the Region is concerned that parking may overflow onto neighbouring roads. On-street parking is not permitted on Regional Roads

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unless in accordance with the appropriate By-laws. One of the holding provisions requested from the Region speaks to the need for a public transit system.

- The proposed By-law schedule shows that portions of the GTA West Corridor are to be rezoned. Planning legislation requires that transportation corridors be protected. The correct corridor width and location should be validated by the Ministry of Transportation. The Region is aware of comments from the Ministry of Transportation in the past for similar circumstances which would not be in support of rezoning the lands. The Town should be consulting with the Ministry of Transportation on this topic.
- Without the completion of Secondary Planning and Block Planning, as well as development application review (with the supporting materials), it is difficult to anticipate if the Zoning By-law Amendment will satisfactorily implement the proposed development. There is a risk that a further Zoning By-law Amendment or Minor Variance(s) may be required to implement the proposed development at a later date.

Further Review

At this time it is challenging for the Region to identify all requirements and comments which we may have on proposed developments within this community due to a lack of information and time being provided to complete a review. As part of any future revised submission of this proposed Zoning By-law Amendment or any future *Planning Act* or development application, the Region will have additional comments.

Region of Peel Review Fees

In accordance with the Region of Peel Fee By-law (By-law 50-2023), the required Zoning By-law Amendment fee payable to the Region of Peel in the amount of \$4,937.94 remains outstanding and is required. Please contact eftadvice@peelregion.ca to make the necessary payment arrangements.

Conclusion

In summary, the proposed Zoning By-law Amendment does not conform to the Regional Official Plan*; however, the Region will continue to work closely with the Town and other stakeholders to address the conformity matters. The Region is a supportive partner in addressing the housing crisis and delivering affordable housing options; however, we suggest that this By-law is premature for the reasons outlined in this letter and stresses to the Town that significant costly infrastructure (which will take years to complete) is required to develop these lands. Further discussion on the financing of those services is required to ensure fiscal responsibility for the Town and Region. The By-law as circulated contains several areas of concern and lacks clarity, zoning standards and holding provisions. Despite the prematurity of this application, the Region has requested zone provisions and holding provisions to be added to the proposed Zoning By-law Amendment and has also outlined a number of other considerations for the Town.

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Correspondence for Public Meeting and Council Meeting

By copy of this letter to the Municipal Clerk, the Region is requesting that this letter form part of the public record and be made available as part of any Public Meeting, Committee Meeting and Council Meeting on this matter.

If you have any questions or concerns, please contact the undersigned at 905-791-7800 ext. 4455, or by email at: tara.buonpensiero@peelregion.ca.

Yours truly,



Tara Buonpensiero, MCIP, RPP
Chief Planner and Director of Planning and Development Services
Public Works Department

c.: Kevin Klingenburg, Municipal Clerk
Agenda@caledon.ca
Bindu Shah, Town of Caledon
Tanjot Bal, Town of Caledon
Carmine Caruso, Town of Caledon
Adam Miller, Toronto and Region Conservation Authority
Dorothy DiBerto, Credit Valley Conservation