



December 16, 2021

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**RE: REGION OF PEEL 2051 OFFICIAL PLAN COMMNETS**

I am writing to advise that at the Town Council meeting held on December 14, 2021, Council adopted a resolution providing that the overview of comments regarding Region of Peel 2051 Official Plan Review, outlined in Staff Report 2021-0430 serve as the Town's comments.

The resolution read as follows:

*That the overview of comments regarding Region of Peel 2051 Official Plan Review, outlined in Staff Report 2021-0430 serve as the Town's comments and therefore be approved;*

*That staff be directed to prepare a concept plan illustrating the Town's preferred SABE map representing the comments contained in Staff Report 2021-0430, and that the map be brought forward to the Planning and Development Committee for consideration on December 6, 2021; and*

*That a copy of Staff Report 2021-0430 be provided to the Region of Peel, the City of Brampton and the City of Mississauga.*

A copy of Staff Report 2021-0430 is enclosed for your reference. For more information regarding this matter, please contact Bailey Loverock, Senior Planner, Policy, Planning for the Town of Caledon directly by e-mail to [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca) or by phone at 905.584.2272 ext. 4274.

Thank you for your attention to this matter.

Sincerely,

Laura Hall, Director, Corporate Services / Town Clerk

c: Bailey Loverock, Senior Planner, Policy, Planning, Town of Caledon, [Bailey.Loverock@caledon.ca](mailto:Bailey.Loverock@caledon.ca)

## Staff Report 2021-0430

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Meeting Date: November 30, 2021

Subject: Region of Peel 2051 Official Plan Comments

Submitted By: Bailey Loverock, Senior Policy Planner, Strategic Policy Planning, Planning Department

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### RECOMMENDATION

That the overview of comments regarding Region of Peel 2051 Official Plan Review, outlined in Staff Report 2021-0430 serve as the Town's comments and therefore be approved;

That staff be directed to prepare a concept plan illustrating the Town's preferred SABE map representing the comments contained in Staff Report 2021-0430, and that the map be brought forward to the Planning and Development Committee for consideration on December 6, 2021; and

That a copy of Staff Report 2021-0430 be provided to the Region of Peel, the City of Brampton and the City of Mississauga.

### REPORT HIGHLIGHTS

- The Region of Peel's Municipal Comprehensive Review has been underway since 2013 and is scheduled to be complete by 2022.
- A draft Regional Official Plan has been prepared and comments from staff have been compiled.
- 4,400 hectares of Community and Employment Lands have been identified for Settlement Area Boundary Expansion; there are concerns with some of these locations and uses.
- The draft Regional Official Plan can be reviewed at <https://www.peelregion.ca/officialplan/review/draft-policies/>.
- Staff have provided comments on the draft Regional Official Plan as it relates to clarity and appropriate wording, what is a Town or Regional responsibility, appropriate phasing and development process for SABE areas, employment policies that align with the Economic Development Strategy, and effective housing policies.

### DISCUSSION

The purpose of this report is to receive Council endorsement on Town of Caledon comments on the Region of Peel 2051 Official Plan Review.

### Background

The Region of Peel's Municipal Comprehensive Review (MCR) and Official Plan Review commenced on May 23, 2013 with a targeted Official Plan adoption in 2022. The Town has been an active participant and stakeholder throughout the process and have provided and continue to provide input and formal comments to the Region.



## Staff Report 2021-0430

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In September 2020, staff provided comments to Council on the Region's technical studies that were being undertaken at the time through Staff Report 2020-0312. These comments were provided to the Region, and staff have continued to work with the Region as these studies were completed. In July 2021, Caledon staff provided comments to Regional staff on a preliminary draft of the Official Plan. Since that time, further public consultation and updates to studies have been completed by the Region. Staff have also been participating in meetings with Regional staff to review previous comments and work towards resolution on some issues.

A draft Official Plan has been prepared by the Region, which is informed by the findings of these technical studies, along with Provincial direction and some input from the local municipalities and stakeholders. Updated Official Plan schedules and figures have also been prepared. The Region has circulated this draft for formal review and comment, with comments being due on November 30, 2021. The comments contained in this Report and attached as Schedule 'A' have been provided to Regional staff on a preliminary basis, noting they are subject to Council endorsement and ratification.

The draft document has been reviewed by Town staff in several departments and comments are contained in Schedule A, attached to this report. The comments being provided are focused around some of the following areas:

- Clarity and appropriate wording
- What is a Town or Regional responsibility
- Appropriate phasing and development process for SABE areas
- Employment policies that align with the Economic Development Strategy
- Effective housing policies

The current draft Regional Official Plan is not reflective of the aggregate policy review study that is ongoing. The study, being a joint study between the Town and the Region, is expected to be completed in 2022. Any proposed policy amendments resulting from that study may form part of future Regional or Town Official Plan Amendments.

### High Level Staff Comments

#### Settlement Area Boundary Expansion (SABE)

At the initiation of the Region of Peel Official Plan Review process, the Region identified a Focus Study Area along the southern limit of the Town of Caledon. The purpose of this Study Area was to establish limits where a Settlement Area Boundary Expansion (SABE) may occur.

A Settlement Area Boundary Expansion (SABE) has been identified in Caledon within the Focus Study Area. Through the Regional work, it has been identified that a total of 4,400 hectares of land is required for the expansion, with 3,000 hectares identified for Community Lands (i.e. residential, parks, commercial, etc.) and 1,400 hectares identified for Employment Lands (i.e. industrial). Once the SABE is approved at the Regional level, these areas will become Designated Greenfield Areas within Caledon's Official Plan. Designated Greenfield Areas are lands within settlement areas (not including rural settlements) but outside of delineated built-up areas that have been designated in an

## Staff Report 2021-0430

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official plan for development and are required to accommodate forecasted growth to the horizon of this Plan.

Through the Region's technical work, there were a number of SABE scenarios prepared. Staff has communicated that the Region's preferred SABE scenario (which has been included in the draft Official Plan) would benefit from further review. Staff are of the opinion that the distribution of Community and Employment lands throughout the Focus Study Area could be improved and will continue to have these discussions with Regional staff. Some concerns with the Region's plan include the treatment of the GTA West corridor, transition between sensitive land uses, and community lands shown within the Provincially Significant Employment Zone. At the direction of Committee, to support our submission to the Region of Peel, staff could prepare a concept plan to illustrate the comments included in this report.

### Phasing and Staging

Proposed policies would require Designated Greenfield Areas in Caledon to have growth management and phasing strategies in place. These growth management and phasing strategies are to address issues such as:

- the improvement of live-work relationships
- unit mix and housing targets
- a range of employment types
- the timing and efficient provision and financing of necessary Region and local municipal services
- fiscal impacts to the Region and local municipalities
- staged build-out and logical extensions to development
- priority areas for development
- prolonging agricultural uses
- the sustainable rate of employment growth related to population growth

Phasing plans should allow Caledon to effectively manage and stage 30 years of growth in a responsible and effective manner.

The plan also contains policies that would direct local municipalities to undertake community or neighbourhood block plans to implement the policies of any new Secondary Plans. The purpose of these plans is to:

- co-ordinate the overall delivery of services and infrastructure
- staging and sequencing
- financial and servicing agreements
- provision of transit corridors and stations
- infrastructure and allocation of development priority
- layout of the transportation system
- the location, configuration character, size and urban form of parks
- institutional, commercial and industrial sites
- layout/function of open space corridors, valley lands, woodlands and other natural features, linkages and enhancement areas, including storm water management

## **Staff Report 2021-0430**

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While block plans can be a useful planning tool, staff are of the opinion that the Town does not agree with the prescribed use of this tool as it is not a statutory requirement. Staff believe the policies should allow for flexibility, as there may be instances where block planning is necessary, but in some cases the secondary planning process will be sufficient. Staff have recommended that flexibility be built into this policy, and that more details regarding when block plans should be required be provided in the Caledon OP.

### **Employment Lands**

A Future Strategic Employment Area has been identified around Sandhill for the purpose of conceptually identifying and protecting employment areas adjacent to or in the vicinity of future goods movement transportation and transit infrastructure for employment uses beyond 2051. The Regional Official Plan proposes permitting a settlement expansion of Sandhill for dry industrial uses if an assessment undertaken by Caledon, in consultation with the Region, indicates that strategic locations within the settlement do not require an extension of municipal services. The assessment will need to address the requirements of Section 5.5.9 of the draft Regional Official Plan (expansions less than 40 hectare policy) excluding those requirements related to servicing, and other technical matters as may be determined by the Region and the Town including a demonstration of the need for additional land to be designated and the assessment of environmental, transportation, financial and agricultural impacts. Town staff are supportive of this policy direction, but suggest further consideration be given to this area.

1,400 hectares of employment land have been identified within the SABE. The last expansion to employment lands in Caledon resulted in a ten year employment land supply being purchased within approximately two years. The lands were not immediately developed due to the necessary studies, servicing and land use approvals. There was no “shovel-ready” and designated lands for attracting new businesses or retaining existing businesses. From an Economic Development perspective, the designation of closer to 1,700 hectares of employment land could help Caledon retain existing businesses, attract new businesses, and move towards a more balanced tax ratio. Town staff is requesting that Regional Council increase the amount of employment land in the SABE.

### **Next Steps**

Staff will continue to work with Regional staff as they advance towards adoption of a new Official Plan in early 2022. The Provincial deadline for completion is July 1, 2022. The Province is the approval authority for the Regional Official Plan Review and appeal rights are limited.

### **FINANCIAL IMPLICATIONS**

There are no immediate Financial Implications associated with this Staff Report.

### **COUNCIL WORK PLAN**

Considering the scale and content of the Official Plan, there are a number of pillars which apply to the Future Official Plan, the most notable being Sustainable Growth, Complete

**Staff Report 2021-0430**

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the Official Plan Review including the Mayfield West Secondary Plan and Bolton Residential Expansion Study.

**ATTACHMENTS**

Schedule A: Comments on the Peel 2051 Official Plan

## Schedule A to Staff Report 2021-0430: Staff Comments on the Peel 2051 Official Plan

ROP Policy / Section Number	Town Comment	Proposed Action
Table of Contents	Glossary	Suggest "Definitions"
Table of Contents	Chapter 5 page 17070	Change to 170
Foreword- Background	Service provision	Should include Transit and Policing
Foreword- Need for a Plan	Lot of use of Peel, the Region, Regional, etc. through whole document	Use one term, maybe two, to define in this Plan
1.1 Purpose	Planning Act referenced	Other Provincial policies should be noted
1.1 Purpose	Role of Plan to be clear	Council's Plan, staff implement the Plan
1.2 Geo/Indigenous	Combined	Should be separate subsections
1.2 Geo/Indigenous	Acknowledgement - consistency	Is the Regional Council Acknowledgement at meetings consistent with this section?
1.2 Geo/Indigenous	Last sentence, page 2- notes "Treaty rights are the specific rights"	Should it not read "Specific rights for our Indigenous Communities were"?
1.3 Guide	Reference to Provincial Plans	Should all Plans have the date, with an "as amended from time to time"?
1.3	Section speaks to "Peel Planning Carefully"	Should reference "Peel and the local municipalities planning carefully"
1.3	"strong, directive policy language"	"strong, prescriptive policy language"
1.4 Application of Provincial Policy		Can this be made easier to read?
1.4	"this plan directs the local"	"this plan prescribes the local"
1.5		Use "intended" rather than "aim"
1.5 e)	Delegated Authority	Already provided- mean more delegated authority
1.6	Pg. 8 – Speaks to the Region promoting "beautiful" buildings. Site plan approvals a local responsibility.	Region has no control over buildings - Site plan control is a local responsibility (other than Regional Buildings)
1.7 Goals	Regional Communities	What does this mean- should it be defined?

## Schedule A: Staff Comments on the Peel 2051 Official Plan

Para after 1.7.4	Fiscal constraints- negative tone	Should have wording like "... are to be supported fiscally"
Para after 1.7.4	Word - "inaction"	Would the development industry not do this? Many examples where certain matters are built by them
Chapter 2 Purpose	All reflected on public sector	Does the private sector not have a role?
Chapter 2	Appears very lengthy, may be cumbersome for those reading the plan.	Would an Appendix work, with an overall high-level direction?
2.3.4	Development industry not noted. They should be stewards too	Include the development industry. They are our partner in city building.
2.3.6	Spacing of words "jointly with"	Add a space
2.4 page 14, second para	Use of word "agencies"	Should that not be the CAs?
2.4.10	Wording "direct" "collaboration"	Should not use direct, counter-intuitive
2.4.10	"Direct the local"	"Require the local"
2.4.2	Transit supportive communities	How- especially if there is no regional system being put into place?
2.4.5	Supportive of this objective however, it requires the necessary designations to support waste management and waste recycling facilities.	
2.4.6	No reference to encouraging vertical agricultural operations that could occur outside of agricultural or rural land base (e.g. in an employment area)	Add a reference
2.4.7 to 2.4.12	None of these objectives have a timing component for when the Region/locals should complete the suggested studies/work (this comment can be applied in many areas of the OP where it suggests work to be completed (e.g. policies 2.5.4 to 2.5.11))	Add timing
2.5.10	Clarify you mean mostly industrial uses	State industrial and other offensive uses
2.5.6	This is weak - already an issue	Need a stronger policy
2.5.8	Same as above	Same as above
2.6 page 18, second para	Watersheds	You list the watercourses, why not the watersheds?
2.6.6	"...and direct the local"	"...and allow the local"



## Schedule A: Staff Comments on the Peel 2051 Official Plan

2.6.10	“direct the local municipalities”	“local municipalities are to”
2.6.11	“direct the local municipalities to include”	“local municipalities are to include”
2.6.12	“direct the local municipalities to require” “resources be supported”	“local municipalities are required to ensure that development” “resources are supported”
2.6.13	Is this a Region or local OP policy to exempt?	Town to capture this requirement in local OP and in pre application requirements if subject to other planning approvals (i.e. site plan)
2.6.14	“Direct the local municipalities to prohibit”	<del>“Direct the local municipalities to prohibit</del> Development and site alteration in key hydrologic features or any associated vegetation protection zone outside of settlement areas is prohibited, in accordance with any policies of this Plan and applicable provincial plan. All local Official Plans shall conform to this policy.”
2.6.16	What is "large scale" development? Permit it anywhere outside of the "settlement area"?	Provide guidance. Need to understand the context. What is that measurement based on? We have large homes (30,000 sq. ft. +), would this include those homes?
2.6.19.5	Subwatershed plans	Why not strengthen this to have the private sector do it. Avoids them getting ahead of the plan seeking development
2.6.20	SWMs	Preamble is repetitive
2.6.20.11	“Direct the local municipalities to develop and implement”	“Local municipalities are required to develop and implement”
2.6.20.14	Plan preparation	Should this not be at a larger level? There are potentially up and down stream issues
2.6.20.19	Pagination	Should last para be e)?
2.6.20.20	“Direct the Local municipalities and conservation authorities to ensure”	“Local municipalities and conservation authorities are required to ensure” Can the CA be directed by the Region?

## Schedule A: Staff Comments on the Peel 2051 Official Plan

2.7 Source Water Protection	Missing the word Authorities	Add "Authorities"
2.7.6	"Direct the Local municipalities to identify the boundaries of vulnerable areas"	"the Local municipalities shall identify the boundaries of vulnerable areas"
2.7.7	"Direct the Local municipalities to include policies in their official plans"	"the Local municipalities shall include policies in their official plans"
2.7.21	Direct the Town of Caledon to restrict development dependent on sanitary sewers and related pipes in wellhead protection areas A, B and E with a vulnerability score of 10, and in issue contributing areas for nitrates or pathogens. New development dependent on sanitary sewers and related pipes shall only be permitted where it has been demonstrated through an approved environmental assessment or similar planning process that the location of the sanitary sewer and related pipes is the preferred alternative and the safety of the drinking water has been assured.	The Town would defer approval of sanitary pipes to the Region.
2.7.22	Direct the Town of Caledon to prohibit the use of land for the establishment of sewage storage facilities in wellhead protection area A with a vulnerability score of 10, wellhead protection area E with a vulnerability score of 9 or greater, and in wellhead protection area E in an issue contributing area for nitrates or pathogens, where the activity would be a significant drinking water threat.	Would the Region not be the approval authority for sewage storage?
2.7.23	Direct the Town of Caledon to restrict the use of land for the establishment of sewage storage facilities in wellhead protection area B with a vulnerability score of 8 or greater, wellhead protection area C with a vulnerability score of 8,	Would the Region not be the approval authority?

## Schedule A: Staff Comments on the Peel 2051 Official Plan

	and issue contributing areas for nitrates or pathogens. The use of land for sewage storage facilities shall only be permitted where it has been demonstrated through an approved environmental assessment or similar planning process that the location of the sewage storage facility is the preferred alternative and the safety of the drinking water system has been assured.	
2.7.24	Direct the Town of Caledon to prohibit development dependent on the establishment of sewage works where the sewage works discharge would be a significant drinking water threat and the discharge is to surface water from: Includes clauses a to c	Would the Region not be the approval authority?
2.9.9	Direct the Town of Caledon to prohibit new on-site sewage systems or subsurface sewage works within 100 metres of any permanent stream, except in the following circumstances: Includes a to c	Would the Region not be the approval authority?
2.9.12	Direct the Town of Caledon to require an environmental assessment for the expansion of an existing or the establishment of a new sewage treatment plant to be completed or approved prior to giving any approvals for the proposal under the Planning Act or the Condominium Act, for a proposed settlement area expansion or a development proposal outside of a settlement area that requires an increase in the existing rated capacity of a sewage treatment plant or the establishment of a new sewage treatment plant	Ultimately the Region would be the approval authority for the establishment of new sewage treatment plans in this scenario as it would most likely be a communal system.

## Schedule A: Staff Comments on the Peel 2051 Official Plan

2.9.15	Direct the Town of Caledon to prohibit the alteration of intermittent streams within the Lake Simcoe Protection Plan Area	Would conservation authorities no be responsible for approving/prohibiting alterations to a stream?
2.11.7	The Town is not permitted to “refine” the requirements of the ORMCP, the Town is required to conform with, at the very least, not conflict with the requirements of the ORMCP.	The Region is requested to consider rephrasing this policy to remove reference to “refine”.
2.11.14 a		Add in that the Natural Core Areas, existing mineral aggregate operations may not be expanded beyond the existing licensed area and new aggregate resource extraction is not permitted
2.11.14c)		Add that new aggregate resource operations are permitted subject to other provisions in the ORMCP
2.11.52		Section 33 should be changed to Section 35
2.12.12.1.3 and 5.7.20.9. b	Does this mean a single dwelling on a lot in prime ag needs an AIA?	Perhaps refinement required?
2.12.12.2.2	Greenbelt	Does this mean active parks? Parkland dedication issue
2.12.12.2.5 and 5.7.20.8	Does this apply to apartments? Garden suites etc.? Is this more restrictive than provincial policy?	
2.12.15.5	Direct the Town of Caledon to include policies in their official plan to develop best practices and strategies for the reuse and the management of excess soil generated and fill received during development or site alteration, including infrastructure development, to ensure that:	The Town will have to follow O. Reg 406/19 and is working on policies to comply with this regulation. Would like to change direct to encourage.
2.14 Preamble		Proposed Schedule Yxxx needs to be added
2.14.26	It appears this policy phrasing incomplete, is it intended that criteria and thresholds for woodlands referenced are to be included in the local official plans?	The Region is requested to please clarify.

## Schedule A: Staff Comments on the Peel 2051 Official Plan

3.3	Supportive of the 3.3 Agricultural System section the objectives and policies appear to assist with the long-term sustainability both for the environmental health of the lands, crop and livestock but also the economic wellbeing agricultural businesses. Lacking however is how objectives are to be met as dependency rests on farmers to act as the stewards of the land without little monetary or administrative support. The objectives and policies are weakened without appropriate programs and services in place perhaps by Regional, Provincial or Federal cooperation with agencies and profit and nonprofit businesses.	Propose changing “improve carbon storage in soil” to “help reach climate change targets”. Suggested change to wording as carbon storage in soil is still not conclusive in this approach – CVC and TRCA conversation indicated there was little scientific support for this.
3.3.19	The requirement for an Agricultural Impact Assessment is a Peel requirement and not a Provincial policy requirement.	This should be clarified.
3.4.14	New policy being added, is aggregate not being addressed through a separate policy review?	
3.4.9	Exemptions	Should it not be the policies they are to be exempted from?
3.5.5	Spacing of words "consistent with"	Add a space
3.6	Protection of cultural resources, particularly built heritage typically a local role - not region	Policy should reference local role. Also don't like the "will aim to ensure" reference. Shall ensure, intends to ensure, etc.
3.6.10	Require that local municipal official plans include that the proponents of development	Existing example of how different words can be used to remove “directives”
3.7.15	No reference to District Energy options.	Town should include District Energy as an option - MTSA areas? Section also speaks to wind as energy - if policy re wind incorporated must identify where they will be permitted

## Schedule A: Staff Comments on the Peel 2051 Official Plan

3.7.17	Direct municipalities to "require" all major development proposals to submit alternative and renewable energy systems feasibility studies, where appropriate...	What constitutes major development? What is criteria who determines "when appropriate"? Need criteria / guidance in the policy
3.7.21	Alternative energy system proposals? In Zoning By-law for evaluating alternative energy system proposals?	Not typically included in a ZBL.
4.3.11	"Viable" employment lands	Who determines what is "viable"? Usually market that is driving a change in employment lands. Market a "viable" rationale?
4.3.13	Population forecast used to support development application where infrastructure or capital investments required	How is it intended this be implemented? If a new subdivision requires new roads including improvement to a local or regional road, how is it intended the forecast be used?
5.3.2	Pagination	Add last one as c)
5.3.3	Support this item, however, require the necessary designations to support waste management and waste recycling facilities.	
5.3.3	Supportive of this item.	Need to designate the lands surrounding the Brampton-Caledon Flight Centre and its flight paths.
5.4.10	Should be reworded	The Region is requested to consider clarifying what constitutes "a significant portion of" growth, new growth and future growth referenced in policies 5.4.1, 5.4.10, 5.4.17 and 5.6.20.14.16.1.
5.4.12	Is it required?	Suggest 5.4.13 does it
5.4.14	Broadband	Seems out of place here
5.4.17.10	Not needed	Add to end of 5.4.17.9
5.4.18.4	Not needed	Already taken care of in previous policies
5.6.18.6	Is this preamble needed as part of this?	Should be at front of OP
5.6 Table 5	Says Bolton GO	Rename to Caledon GO (Bolton)
5.6.20.11	Staging and sequencing plans	Have a policy which identifies the requirements and provide the ability to be flexible

## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.6.20.12	We are opposed to the requirement for block plans. The Block Plan process has come under extreme scrutiny for the perceived "delay" by developers for bringing housing to the market. In some areas with block planning they have considered removing this requirement in favour of more detailed Secondary Plans.	If use Block Plans need to carefully consider implementation to avoid duplication and changes in policies/guidelines over time
5.6.20.12, 5.6.20.13, 5.6.20.14.9	Block Plans	If a local does not do these - why require it? Not a statutory process under Provincial policies or the Act. Change to may not a must there could be circumstances where it makes sense to implement and some where secondary plans are sufficient.
5.6.20.14.14	If there is MDS mapping inserted in the OP, it does not mean that it is the only MDS applicable as that mapping was based on a snapshot in time. Some may not recognize that you would still need to review the area to identify setbacks. In addition, if the resource is removed and the setback no longer applies, to keep the OP current, we would need to continuously update mapping.	Suggest that the OP policies for the secondary plan would include policies which would require MDS be met and that through zoning, draft plan conditions, etc. you would specify the MDS requirement and how it is applicable.
5.6.20.14.14 I	0 Charleston Sideroad could apply to a number of properties. Caution the way the lands are described. Do we want this to be in accordance with the Rehab Master Plan? What about sewage servicing for this area?	Specifies Campbell's Cross, but there could be other communities affected – should this be broadened?
5.6.20.14.17.10	Typo: it would appear that the last sentence of this policy intended to include the word "planning" rather than "panning".	Correct typo
5.6.20.14.18.1	Affordable Housing	Why have separate Housing policies for Mayfield - should they not be universal from a Regional perspective?
5.6.20.14.19.1	Phasing	Should this be done first at the Region?
5.7.1.6	0 Charleston Sideroad could apply to a number of properties.	Caution the way the lands are described. What about sewage servicing for this area?
5.7.18	Palgrave - only area being designated	Are you advocating more housing here or protecting it?

## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.7.20.7		This policy should only refer to existing licensed mineral aggregate operations
5.7.20.11		We want to align this with our Rural Economic Development Area permissions in our OP (not be more restrictive)
5.7.3	Rural - complete rural communities	How do you achieve this?
5.7.9		This policy should recognize that CHPMARAs may be identified in the Caledon Official Plan
5.8 Employment		Include the following: For the support of employment areas, encourage policies to assist employers in the attraction and retention of skilled workforce – public transit (local and regional connection), active transportation, employment area commercial uses to support workforce including health, education, post-secondary campus and other services, mixed use zones and affordable housing.
5.8 Employment		Include the following: the general allocation of employment areas does not effectively protect the various needs associated with different types of industry. Heavy industrial uses including asphalt plants, waste processing, concrete batch plants and other noxious uses need specific areas allocated, identified and have the necessary buffer/setbacks to separate these areas from neighbouring sensitive uses such as residential and prestige industrial areas.
5.8	Employment, no need for population number	Remove population number
5.8.19	Employment Forecasts	Should clarify locals to meet these numbers



## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.8.2	Supportive of this policy as it does support the protection of employment areas and a broad range of employment uses but there is a lack of focused policy on the protection of key economic sectors within the Region, City of Mississauga, City of Brampton and Town of Caledon would all through their economic strategies have identified key industrial sectors which are of strategic importance and have a significant interest to have land use planning, infrastructure and other services dedicated to retain, grow and attract investment in these sectors..	It is encouraged that additional policy is included to have specific employment areas protected for key industrial sectors
5.8.27	Do not support this policy as the general allowance for industrial uses does not protect the lands adjacent to the Brampton-Caledon Flying Club for uses that support and enable the growth of the airport as an aviation hub for flight and associated aviation goods and services.	
5.8.28	Employment uses versus sensitive uses	How is retail or commercial deemed sensitive, or not considered as a lower end employer? Clarify
5.8.39	Supportive of this policy as it supports public transit and active transportation in our employment areas making it easier and more affordable for employees to access the workplace – further to this point is the need to have transit connectivity at a regional level and have the infrastructure in place for the last mile to safely and efficiently allow employees to move from the bus stop to the front door of the employer.	
5.8.43	Support this policy however it does not provide an action on what the Region of Peel and the Town of Caledon can take if it is identified there is an inadequate supply of land.	Include those actions in this policy

## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.8.44	Not fully supportive of this section and would suggest further refinement of the policies as currently drafted. Sandhill would be suitable for transportation depot/logistics hub offering an option to remove illegal truck parking from agricultural and residential designated properties.	Suggest that the future strategic employment areas i.e. the Sandhill area be designated as an area to allow for un-serviced industrial and would allow for setback and buffer to remove access to Airport Road and provide wide landscape boulevards to improve the aesthetic environment through the Airport Road corridor. This area should be added to the Employment lands allocation for the purpose as noted.
5.8.44.6	Dry Industrial	Should be defined
5.9 Housing	Overall - written as work with locals, then directives added	Keep the tone more even
5.9.15	Affordable Housing Assessment	Policies required in Town OP to require an Affordable Housing Assessment to be undertaken for "large development applications". What is a "large development application"? Policy must be included in Town OP. Also referred to in 5.9.68
5.9.16	What is large development?	This needs to be described or defined within this policy. Does this apply to Palgrave Estates? Infill? Greenfield only?
5.9.30	Rates	Just use Regional rate for consistency across the Region
5.9.31	Rental Units	Need something stronger. Is the Region not a service provider that can help in this?
5.9.51	Transit noted but no policies to do a Regional Transit system	Need to reword to clarify
5.9.62	Housing barriers	Should this be identified, based on what we know today?
5.9.64	Greater community awareness	Need something more here, already an issue across the GTA for many

## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.10	No polies re Regional roads and promoting local road design to achieve sense of place, better design, etc.	Transit Schedule Y4 does not show any Rapid Transit Corridor connections into Caledon except for Bolton GO and 1 transit route into Mayfield to support planned population and employment. Need to reconsider planned transit routes in Caledon- this is a 30-year plan. Want policies to encourage development of public transit facilities through partnerships with the private sector - similar to Metrolinx model for delivering transit station for the Yonge subway extension.
5.10 Transportation	Projected growth numbers do not match	Pg 275 and pg 252 do not match
5.10.32.9	To promote a transportation system that encourages sustainable mode choices, reduced emissions, and energy conservation	Add "and recreation"
5.10.32.11	Carpooling	Agreed. But if they are not associated with larger transportation initiatives - can we be successful?
5.10.33	GTA West Corridor- contained in words but not on mapping	Add to mapping
5.10.34.10	Investigate multi modal	Not sure what this means and why it is noted? Should that not be a given?
5.10.34.12	Imperial measurements? In other areas of the plan also	Use only metric
5.10.34.16	Requires noise attenuation along regional roads with abutting residential	Policy will result in miles of fencing along Regional roads. Does not create any sense of place and results in design typical of 80s subdivision design
5.10.34.22	Support the development of a safe, connected and accessible network of sustainable transportation facilities on new or improved Regional roads, where feasible	Add "a safe"
5.10.35	BFC have applied for an airport zoning regulation.	Should there be recognition of supporting requested AZR?
5.10.35.1	This section and others refer to the Brampton Flying Club Airport - Schedule Z1 shows a "Brampton Caledon Airport".	Use same through text and schedules

## Schedule A: Staff Comments on the Peel 2051 Official Plan

5.10.38.10		Add "Work with local municipalities and the private sector to provide and maintain a built environment that supports active transportation for persons with disabilities."
5.10.38.12		Add "consult regularly with accessibility groups/committees"
6.4 Age Friendly	Aging in place	Can we add the missing middle here and allow mid-rise in certain areas as-of-right?
6.5.7	Are private communal sewage systems permitted in settlement areas? i.e. the proposed development at 18314 Hurontario Street. Would that communal sewage system be permitted?	Perhaps how "it is determined" that these are permitted should be discussed?
Chapter 7	Seems disjointed	Certain sections (like 7.5 and 7.6) should be in other parts of the OP
7.3.6	Text versus Mapping	Just say the text prevails
7.12	Supportive of the collection of information to ensure that the policies and objectives are successful however it is suggested that one measure that would be useful would be the time taken for the approval of Official Plan Amendments, Zoning By-Law Amendments and Site Plan Applications. Economic Development has received numerous comments and requests from industrial/commercial developers related to the recent shifts of demand for industrial and commercial buildings, decisions are made in months and not in years. To be competitive with other regions, Region of Peel and Town of Caledon need to collect information on approval process and based on the measures have the Region and Town of Caledon provided the necessary support and process to have in place an efficient and effective process to have planning applications in a timely manner understanding however that there are some applications that are of a technical nature that requires additional time.	

## Schedule A: Staff Comments on the Peel 2051 Official Plan

7.3.5	What does this mean?	If intent is Regional policy prevails, just say it
7.4.9.4	Concern is the amount of time they utilize “Direct the Town of Caledon” when it comes to policies on source water protection, water and wastewater. Staff are of the understanding that the Region is the main regulatory body when it comes to these items, but now it seems as though they are downloading some of this to the Town. In their response to Town comment on Policy 7.4.9.4 they indicate that they are not precluded (on this particular policy) as a commenting body on applications from raising concerns if appropriate. Would like to know if this applies to all these policies they are now directing the Town to implement and what they consider to be “if appropriate”.	
7.12.10		In view of the Region's four imperatives, it would be reasonable to add cultural impacts
Definitions	Ensure consistency with definitions in Peel Plan	Several definitions in the Region Plan.
Schedules Y2 & Y3	Schedules identify Major Roads and mid-block collectors	Policies re truck infiltration into residential communities?
Schedule Y3	Does Queen St go from 45 to 20 to 40? The colours for 20 and 45 are too similar to differentiate. Won't the changing of ROW be an issue? Are there environmental constraints restricting the ROW in these situations?	
Figure Y6	Concerns with streets that are included.  Is this Parr and George Bolton? Are they okay to be on the strategic regional network? Wouldn't they just be local connectors?	Mountainview Rd and Horseshoe Hill Rd should be removed from the goods movement network.  Now that BAR construction is completed, Highway 50 should be removed as a Primary Truck Route.
Figure Y8	The Existing and Long-Term Cycling Network, the existing cycling network does not seem to include the 2021 cycling routes.	Update existing cycling facilities based on the 2021 cycling routes.

## Schedule A: Staff Comments on the Peel 2051 Official Plan

Figure Y9	Existing and Long-Term Pedestrian Network, the existing pedestrian data does not include all sidewalks but believe this is deliberate.	
Table 1	Has this been vetted by and agreed by the CAs?	Ensure CAs are in agreement
Table 3	Observation- later in the doc numbers differ	Compare numbers in doc for consistency
Table 4	Housing Targets	Need to determine how these targets will be implemented. These across Region or locals? In each development? Across all new community areas? Also, 5.9.20 speaks to accommodating 1, 2, and 3 bedroom units.
Definitions	LIDs	Not defined, include definition
General Comment	Too much plannerese throughout document	Remove words that are plannerese and make it more user friendly.

## Schedule A: Staff Comments on the Peel 2051 Official Plan

General Comment	<p>Settlement Area Boundary Expansion – With respect to current land supply that was provided in the last Official Plan Review the additional land was purchased and was no longer available for purchase thereby locking the 10-year land supply within 2 years. The lands were not immediately developed due to the necessary studies, servicing and land use approvals but there were no shovel ready and designated lands for attracting new businesses and the Town did not have the ability to retain existing businesses. Provided the experience from Economic Development, 650 net acres every 5 years would provide a reasonable reflection on the market need and designated and zoned in order to ensure land supply is not locked up to allow for the retention and attraction of businesses in key economic sectors i.e. Manufacturing, food and beverage and knowledge based industry. Having the lands phased would also ensure that work can be coordinated to ensure servicing, road construction, designations and zoning and the necessary studies are completed. This method will provide the industrial client an assurance that the lands are shovel ready and do not require further planning or servicing construction.</p>	<p>With the calculations of having 650 net acres (263 net hectares) every 5 years, it would require 1710 gross hectares over 30 years (based on 30% land for road, protected and open space areas). It is economic development's opinion that an additional 500 gross hectares is needed over the 1200 ha (estimated on the SABE Concept Map) and would be required till 2051 – Economic Development is in support of the Region working with the municipality to have annual review on land supply, demand and absorption. The land requirement also needs to include un-serviced industrial land for low density logistics – transportation depots use to offer an option for truck companies to help reduce Caledon's illegal truck parking issue. Using the Future Strategic Employment Area as noted in Section 5.8.44 of the draft OP – Sandhill area for this purpose and adding these lands to the employment land allocation as noted on the SABE Concept Map. This could also serve as a peri-urban approach that would allow beyond 20 years the future intensification of the area for other industrial related uses.</p>
General Comment	<p>Industrial lands need to be protected from conversion – Bolton has experienced an increase in residential infill in the last several years which is positive however in areas that it impacts existing industrial areas this is a problem. With the current industrial land shortage and pressure on our existing industrial businesses that they are not wanted creates an environment within the community that the Region and Town are not business friendly.</p>	

## Schedule A: Staff Comments on the Peel 2051 Official Plan

General Comment	The OP is lengthy	
General Comment	2051 New Community Planning Areas - repeated many times	Settle on 2051 Plan and do it at front of OP
General Comment	Reconsider use of "direct". It is a word used by Council to direct staff, it is a word for resolutions.	It would be better to reflect a unified effort to use "Encourages", "work with" or something similar
General Comment	There are many policies which will trigger site plan control, trigger submission material related to an application, restrict the issuance of building permits. Many of these triggers are speaking to wellhead protection areas. This will result in amendments to our by-laws, etc.	Has the Region reviewed these policy directions against Section 41 of the Planning Act?
General Comment	<p>While the Region of Peel provided a response to comments regarding Cultural Heritage policies in the Consolidated Comments spreadsheet, the Region has not incorporated the proposed revisions to these policies in the draft Region of Peel OP which was recently circulated (version identified as 'Draft Tracked Changes as of October 1, 2021'). As such, the Town of Caledon comments regarding the Cultural Heritage policies remain outstanding and must be addressed prior to the finalization of the Region of Peel Official Plan.</p> <p>Furthermore, Heritage staff are of the understanding that the Region of Peel has consulted with Indigenous communities regarding the Peel 2051 Official Plan Review and received in response questions and comments on Indigenous engagement and cultural heritage policies that may result in minor changes to policies. The Six Nations of the Grand River First Nation has requested an additional meeting to further discuss cultural heritage and archaeology.</p>	



## Schedule A: Staff Comments on the Peel 2051 Official Plan

	Heritage staff advise that it is premature to provide further commentary on the heritage-related policies in the draft Peel 2051 document until this meeting taken place and the document revised to address the questions and concerns of all Indigenous groups.	
General Comment	It is noted that the Regional plan speaks at length about the importance of compact, mixed and complete communities. We are hopeful that the Region will help facilitate the growth of nodes and mixed use corridors. This will require a multi-government approach to investment in strategic infrastructure and municipal transit, and we hope the Region will work with the Town on the delivery of transit.	
General Comment	Staff would like to work with the Region to explore a policy that affords flexibility to refine community and employment area as we work through our Official Plan review and secondary planning processes.	
General Comment	When referring to approvals of plans or amendments, it would be helpful if there were specific dates.	