

March 10, 2021

March 5, 2021

Planning and Development Department
Town of Caledon
6311 Old Church Road
Caledon, ON L7C 1J6

Attention: Mr. Adam Wendland, Community Development Planner

Dear Mr. Wendland:

**Re: Addendum to Planning Justification Report
Application for Zoning By-law Amendment
Town File: RZ 2020-0007
8281 and 0 Healey Road
(Bolton) Town of Caledon, Ontario**

Our File: HRP/CAD/-19-01

An application for a Zoning By-law Amendment was submitted to the Town of Caledon and deemed complete on August 27, 2020. The application proposes to refine the existing EPA1 zoning boundaries applicable to the subject lands located at 8281 and 0 Healey Road. The zoning refinement is based upon additional environmental analysis of the Clarkway Tributary Corridor, and is intended to facilitate more efficient use of the subject lands through a future development within the context of the existing MP-580 and MS-579 zones.

A Planning Justification Report dated July 2020 was prepared by Zelinka Priamo Ltd., and was submitted in support of the above-noted application. Comments regarding the proposed development were provided to the applicant from various Town departments and external agencies.

This Addendum to the Planning Justification Report has been prepared to provide further planning analysis where appropriate in light of Staff comments. The addendum letter supports the resubmission and is an update to portions of the analysis contained within our July 2020 Planning Justification Report.

It continues to be our planning opinion that the proposed development is appropriate and is in the public interest.

PROVINCIAL POLICY STATEMENT (2020)

An analysis of the 2020 Provincial Policy Statement (2020 PPS) was provided in our July 2020 Planning Justification Report. Based on Staff feedback, further analysis was requested with respect to Section 1.6 of the 2020 PPS, which relates to Infrastructure and Public Service Facilities.

We note the following Section 1.6 PPS policies as it relates to the proposed ZBA:

- *Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.*

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are (Policy 1.6.1):

- a) *financially viable over their life cycle, which may be demonstrated through asset management planning; and*
 - b) *available to meet current and projected needs.*
- *Planning authorities should promote green infrastructure to complement infrastructure (Policy 1.6.2).*
- *Before consideration is given to developing new infrastructure and public service facilities (Policy 1.6.3):*
 - a) *the use of existing infrastructure and public service facilities should be optimized; and*
 - b) *opportunities for adaptive re-use should be considered, wherever feasible.*
- *Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety in accordance with the policies in Section 3.0: Protecting Public Health and Safety (Policy 1.6.4)*
- *Public service facilities should be co-located in community hubs, where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and active transportation (Policy 1.6.5)*

1.6.6 Sewage, Water and Stormwater

- *Planning for sewage and water services shall (Policy 1.6.6.1):*
 - a) *accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:*
 1. *municipal sewage services and municipal water services; and*
 2. *private communal sewage services and private communal water services, where municipal sewage services and municipal water services are not available or feasible;*
 - b) *ensure that these systems are provided in a manner that:*
 1. *can be sustained by the water resources upon which such services rely;*
 2. *prepares for the impacts of a changing climate;*
 3. *is feasible and financially viable over their lifecycle; and*
 4. *protects human health and safety, and the natural environment;*
 - c) *promote water conservation and water use efficiency;*

- d) *integrate servicing and land use considerations at all stages of the planning process; and*
 - e) *be in accordance with the servicing hierarchy outlined through policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5. For clarity, where municipal sewage services and municipal water services are not available, planned or feasible, planning authorities have the ability to consider the use of the servicing options set out through policies 1.6.6.3, 1.6.6.4, and 1.6.6.5 provided that the specified conditions are met.*
- *Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services (Policy 1.6.6.2).*
 - *Where municipal sewage services and municipal water services are not available, planned or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety (Policy 1.6.6.3).*
 - *Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. In settlement areas, individual on-site sewage services and individual on-site water services may be used for infilling and minor rounding out of existing development.*

At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the character of rural settlement areas. Where planning is conducted by an upper-tier municipality, the upper-tier municipality should work with lower-tier municipalities at the time of the official plan review or update to assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the desired character of rural settlement areas and the feasibility of other forms of servicing set out in policies 1.6.6.2 and 1.6.6.3 (Policy 1.6.6.4).

- *Partial services shall only be permitted in the following circumstances:*
 - a) *where they are necessary to address failed individual on-site sewage services and individual on-site water services in existing development; or*
 - b) *within settlement areas, to allow for infilling and minor rounding out of existing development on partial services provided that site conditions are suitable for the long-term provision of such services with no negative impacts.*

Where partial services have been provided to address failed services in accordance with subsection (a), infilling on existing lots of record in rural areas in municipalities may be permitted where this would represent a logical and

- financially viable connection to the existing partial service and provided that site conditions are suitable for the long-term provision of such services with no negative impacts. In accordance with subsection (a), the extension of partial services into rural areas is only permitted to address failed individual on-site sewage and individual on-site water services for existing development (Policy 1.6.6.5).*
- *Subject to the hierarchy of services provided in policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5, planning authorities may allow lot creation only if there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity within municipal sewage services and municipal water services or private communal sewage services and private communal water services. The determination of sufficient reserve sewage system capacity shall include treatment capacity for hauled sewage from private communal sewage services and individual on-site sewage services (Policy 1.6.6.6).*
 - *Planning for stormwater management shall (Policy 1.6.6.7):*
 - a) *be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
 - b) *minimize, or, where possible, prevent increases in contaminant loads;*
 - c) *minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*
 - d) *mitigate risks to human health, safety, property and the environment;*
 - e) *maximize the extent and function of vegetative and pervious surfaces; and*
 - f) *promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development.*

The proposed development will make efficient use of existing and expanded infrastructure. The ZBA proposes a zone boundary refinement, which will continue to maintain the ecological integrity of the Clarkway Tributary Corridor, while making efficient use of the surrounding lands by creating a more developable footprint.

As demonstrated by the Functional Servicing Report and Storm Water Management Design Brief dated February, 2021 prepared by The Odan/Detech Group Inc., the site is serviceable for sanitary, stormwater, and water supply generally by way of extension of existing infrastructure to allow for connections. Gas and hydro infrastructure connections are also available to the subject lands. The subject lands will be on full services upon development.

Opportunities for complimentary green infrastructure will be evaluated through the detailed design phase of the development as part of Site Plan Approval. Opportunities for low impact development are proposed, including as it relates to stormwater management, Low Impact Development (LID) and quantity/quality control.

1.6.7 Transportation Systems

- *Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs (Policy 1.6.7.1).*
- *Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible (Policy 1.6.7.2).*
- *As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional boundaries (Policy 1.6.7.3).*
- *A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation (Policy 1.6.7.4).*

1.6.8 Transportation and Infrastructure Corridors

- *Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs (Policy 1.6.8.1).*
- *Major goods movement facilities and corridors shall be protected for the long term (Policy 1.6.8.2).*
- *Planning authorities shall not permit development in planned corridors that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.*

New development proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, mitigate or minimize negative impacts on and from the corridor and transportation facilities (Policy 1.6.8.3).

- *The preservation and reuse of abandoned corridors for purposes that maintain the corridor's integrity and continuous linear characteristics should be encouraged, wherever feasible (Policy 1.6.8.4).*
- *The co-location of linear infrastructure should be promoted, where appropriate (Policy 1.6.8.5).*
- *When planning for corridors and rights-of-way for significant transportation, electricity transmission, and infrastructure facilities, consideration will be given to the significant resources in Section 2: Wise Use and Management of Resources (Policy 1.6.8.6).*

The subject lands are existing designated/zoned lands, with frontage along and existing access to Healey Road. The existing MS-579 and MP-580 zones permit a broad range of employment related uses. The proposed ZBA does not seek to alter the uses permitted on the subject lands, but rather seeks to refine the existing zoning boundaries in consideration of future development. Staff have identified that Healey Road is not

currently designed to accommodate truck traffic that may be associated with employment uses as already permitted under the existing zoning. It is our understanding that upgrades to Healey Road are planned to be undertaken in approximately 2025. The proposed ZBA seeks to refine the existing zone boundaries and no specific built form or uses are contemplated at this time. Through a future Site Plan Approval process, when a built form/uses are proposed, the integrity of the existing Healey Road to accommodate the type of traffic generated by the proposed development can be evaluated. Future improvements to Healey Road will ensure the road is designed to safely accommodate the traffic anticipated to be generated by properties with frontage along the roadway.

The proposed development will make efficient use of the existing transportation system. Healey Road is identified by the Town of Caledon as a Collector Road on Schedule J, Long Range Road Network of the Official Plan. Policy 5.9.5.10.1 of the Town of Caledon Official Plan states that to provide for the safe and efficient movement of trucks through and within the Town, the Town: b) "Will permit truck use of medium capacity arterials and collector roadways only as connectors to service high capacity arterial routes, pending structural suitability." Accordingly, the intent of Healey Road is to accommodate potential truck traffic generated from the employment lands that have frontage along Healey Road in order to connect to Coleraine Drive.

GROWTH PLAN (2019)

An analysis of the 2019 Growth Plan for the Greater Golden Horseshoe (Growth Plan) was provided in our July 2020 Planning Justification Report. Based on Staff feedback, further analysis was requested with respect to Sections 3 (servicing) and 4 (natural heritage) of the Growth Plan, which relate to Infrastructure to Support Growth, and Protecting What is Valuable.

3.2.1 Integrated Planning

1. *Infrastructure planning, land use planning, and infrastructure investment will be coordinated to implement this Plan.*
2. *Planning for new or expanded infrastructure will occur in an integrated manner, including evaluations of long-range scenario-based land use planning, environmental planning and financial planning, and will be supported by relevant studies and should involve:*
 - a) *leveraging infrastructure investment to direct growth and development in accordance with the policies and schedules of this Plan, including the achievement of the minimum intensification and density targets in this Plan;*
 - b) *providing sufficient infrastructure capacity in strategic growth areas;*
 - c) *identifying the full life cycle costs of infrastructure and developing options to pay for these costs over the long-term; and*
 - d) *considering the impacts of a changing climate.*
3. *Infrastructure investment and other implementation tools and mechanisms will be used to facilitate intensification and higher density development in strategic growth areas. Priority will be given to infrastructure investments made by the Province that support the policies and schedules of this Plan.*

4. *Municipalities will assess infrastructure risks and vulnerabilities, including those caused by the impacts of a changing climate, and identify actions and investments to address these challenges, which could be identified as part of municipal asset management planning*

As demonstrated by the Functional Servicing Report and Storm Water Management Design Brief prepared by The Odan/Detech Group Inc., the site is serviceable for sanitary, stormwater, and water supply generally by way of extension of existing infrastructure to allow for connections. Gas and hydro infrastructure connections are also available to the subject lands. The subject lands will be on full services upon development. The applications propose to coordinate appropriate servicing infrastructure to accommodate the proposed development and not compromise future opportunities for growth within the area.

3.2.2 Transportation – General

1. *Transportation system planning, land use planning, and transportation investment will be co-ordinated to implement this Plan.*
2. *The transportation system within the GGH will be planned and managed to:*
 - a) *provide connectivity among transportation modes for moving people and for moving goods;*
 - b) *offer a balance of transportation choices that reduces reliance upon the automobile and promotes transit and active transportation;*
 - c) *be sustainable and reduce greenhouse gas emissions by encouraging the most financially and environmentally appropriate mode for tripmaking and supporting the use of zero- and low-emission vehicles;*
 - d) *offer multimodal access to jobs, housing, schools, cultural, and recreational opportunities, and goods and services;*
 - e) *accommodate agricultural vehicles and equipment, as appropriate; and*
 - f) *provide for the safety of system users.*
3. *In the design, refurbishment, or reconstruction of the existing and planned street network, a complete streets approach will be adopted that ensures the needs and safety of all road users are considered and appropriately accommodated.*
4. *Municipalities will develop and implement transportation demand management policies in official plans or other planning documents or programs to:*
 - a) *reduce trip distance and time;*
 - b) *increase the modal share of alternatives to the automobile, which may include setting modal share targets;*
 - c) *prioritize active transportation, transit, and goods movement over single-occupant automobiles;*
 - d) *expand infrastructure to support active transportation; and*
 - e) *consider the needs of major trip generators.*

3.2.4 Moving Goods

1. *Linking major goods movement facilities and corridors, international gateways, and employment areas to facilitate efficient goods movement will be the first priority of highway investment.*
2. *The Province and municipalities will work with agencies and transportation service providers to:*
 - a) *co-ordinate, optimize, and ensure the long-term viability of major goods movement facilities and corridors;*
 - b) *improve corridors for moving goods across the GGH in accordance with Schedule 6;*
 - c) *promote and better integrate multimodal goods movement and freight-supportive land use and transportation system planning; and*
 - d) *accommodate agricultural vehicles and equipment, as appropriate.*
3. *Municipalities will provide for the establishment of priority routes for goods movement, where feasible, to facilitate the movement of goods into and out of employment areas and other areas of significant commercial activity and to provide alternate routes connecting to the provincial network.*

The subject lands have frontage along and access to Healey Road, which is identified by the Town of Caledon as a Collector Road on Schedule J, Long Range Road Network of the Official Plan. Policy 5.9.5.10.1 of the Town of Caledon Official Plan states that to provide for the safe and efficient movement of trucks through and within the Town, the Town: b) "Will permit truck use of medium capacity arterials and collector roadways only as connectors to service high capacity arterial routes, pending structural suitability." Accordingly, the intent of Healey Road is to accommodate potential truck traffic generated from the employment lands that have frontage along Healey Road in order to connect to Coleraine Drive.

Potential future investment is anticipated to be undertaken for the improvement of Healey Road to specifically accommodate higher volumes of traffic, in consideration of the planned context of the employment lands along Healey Road. The lands subject lands are existing designated/zoned lands and the ZBA application does not propose to alter the range of permitted employment uses.

3.2.6 Water and Wastewater Systems

1. *Municipalities should generate sufficient revenue to recover the full cost of providing and maintaining municipal water and wastewater systems.*
2. *Municipal water and wastewater systems and private communal water and wastewater systems will be planned, designed, constructed, or expanded in accordance with the following:*
 - a. *opportunities for optimization and improved efficiency within existing systems will be prioritized and supported by strategies for energy and water conservation and water demand management;*
 - b. *the system will serve growth in a manner that supports achievement of the minimum intensification and density targets in this Plan;*
 - c. *a comprehensive water or wastewater master plan or equivalent, informed by watershed planning or equivalent has been prepared to:*

-
- i. *demonstrate that the effluent discharges and water takings associated with the system will not negatively impact the quality and quantity of water;*
 - ii. *identify the preferred option for servicing growth and development, subject to the hierarchy of services provided in policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5 of the PPS, 2020, which must not exceed the assimilative capacity of the effluent receivers and sustainable water supply for servicing, ecological, and other needs; and*
 - iii. *identify the full life cycle costs of the system and develop options to pay for these costs over the long-term.*
 - d. *in the case of large subsurface sewage disposal systems, the proponent has demonstrated attenuation capacity; and*
 - e. *plans have been considered in the context of applicable interprovincial, national, bi-national, or state-provincial Great Lakes Basin agreements or provincial legislation or strategies.*
3. *For settlement areas that are serviced by rivers, inland lakes, or groundwater, municipalities will not be permitted to extend water or wastewater services from a Great Lakes source unless:*
- a. *the extension is required for reasons of public health and safety, in which case, the capacity of the water or wastewater services provided in these circumstances will be limited to that required to service the affected settlement area, including capacity for planned development within the approved settlement area boundary;*
 - b. *in the case of an upper- or single-tier municipality with an urban growth centre outside of the Greenbelt Area:*
 - i. *the need for the extension has been demonstrated;*
 - ii. *the increased servicing capacity will only be allocated to settlement areas with urban growth centres; and*
 - iii. *the municipality has completed the applicable environmental assessment process in accordance with the Ontario Environmental Assessment Act; or*
 - c. *the extension had all necessary approvals as of July 1, 2017 and is only to service growth within the settlement area boundary delineated in the official plan that is approved and in effect as of that date.*
4. *Municipalities that share an inland water source or receiving water body will coordinate their planning for potable water, stormwater, and wastewater systems based on watershed planning or equivalent to ensure that the quality and quantity of water is protected, improved, or restored.*

As demonstrated by the Functional Servicing Report and Storm Water Management Design Brief prepared by The Odan/Detech Group Inc., the site is serviceable for water supply generally by way of an existing 200mm water main located on Healey Road. The

Report indicates that it is expected that the availability of water supply will be sufficient to service the development.

3.2.7 Stormwater Management

1. *Municipalities will develop stormwater master plans or equivalent for serviced settlement areas that:*
 - a. *are informed by watershed planning or equivalent;*
 - b. *protect the quality and quantity of water by assessing existing stormwater facilities and systems;*
 - c. *characterize existing environmental conditions;*
 - d. *examine the cumulative environmental impacts of stormwater from existing and planned development, including an assessment of how extreme weather events will exacerbate these impacts and the identification of appropriate adaptation strategies;*
 - e. *incorporate appropriate low impact development and green infrastructure;*
 - f. *identify the need for stormwater retrofits, where appropriate;*
 - g. *identify the full life cycle costs of the stormwater infrastructure, including maintenance costs, and develop options to pay for these costs over the long-term; and*
 - h. *include an implementation and maintenance plan.*
2. *Proposals for large-scale development proceeding by way of a secondary plan, plan of subdivision, vacant land plan of condominium or site plan will be supported by a stormwater management plan or equivalent, that:*
 - a. *is informed by a subwatershed plan or equivalent;*
 - b. *incorporates an integrated treatment approach to minimize stormwater flows and reliance on stormwater ponds, which includes appropriate low impact development and green infrastructure;*
 - c. *establishes planning, design, and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion, and impervious surfaces; and*
 - d. *aligns with the stormwater master plan or equivalent for the settlement area, where applicable.*

As identified by the Functional Servicing Report and Storm Water Management Design Brief prepared by The Odan/Detech Group Inc., all storms will be conveyed to the downstream existing SWM facility, which was demonstrated to have sufficient capacity to accommodate flows generated from the development of the subject lands. A conceptual site plan will be finalized upon determining the development limits through the ZBA application. Opportunities for specific quantity and quality control will be identified as part of a future Site Plan Approval application, which may include rooftop storage as identified by the Odan/Detech Report.

Section 3.2.8 of the Growth Plan relates to Public Service Facilities. The proposed ZBA is not anticipated to directly impact the provision of public service facilities in the area.

4.2.1 Water Resource Systems

1. *Upper- and single-tier municipalities, partnering with lower-tier municipalities and conservation authorities as appropriate, will ensure that watershed planning is undertaken to support a comprehensive, integrated, and long-term approach to the protection, enhancement, or restoration of the quality and quantity of water within a watershed.*
2. *Water resource systems will be identified to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions.*
3. *Watershed planning or equivalent will inform:*
 - a. *the identification of water resource systems;*
 - b. *the protection, enhancement, or restoration of the quality and quantity of water;*
 - c. *decisions on allocation of growth; and*
 - d. *planning for water, wastewater, and stormwater infrastructure.*
4. *Planning for large-scale development in designated greenfield areas, including secondary plans, will be informed by a subwatershed plan or equivalent.*
5. *Municipalities will consider the Great Lakes Strategy, the targets and goals of the Great Lakes Protection Act, 2015, and any applicable Great Lakes agreements as part of watershed planning and coastal or waterfront planning initiatives.*

4.2.2 Natural Heritage System

1. *A Natural Heritage System for the Growth Plan has been mapped by the Province to support a comprehensive, integrated, and long-term approach to planning for the protection of the region's natural heritage and biodiversity. The Natural Heritage System for the Growth Plan excludes lands within settlement area boundaries that were approved and in effect as of July 1, 2017.*
2. *Municipalities will incorporate the Natural Heritage System for the Growth Plan as an overlay in official plans, and will apply appropriate policies to maintain, restore, or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features and areas as set out in the policies in this subsection and the policies in subsections 4.2.3 and 4.2.4.*
3. *Within the Natural Heritage System for the Growth Plan:*
 - a. *new development or site alteration will demonstrate that:*
 - i. *there are no negative impacts on key natural heritage features or key hydrologic features or their functions;*
 - ii. *connectivity along the system and between key natural heritage features and key hydrologic features located within 240 metres of each other will be maintained or, where possible, enhanced for the movement of native plants and animals across the landscape;*
 - iii. *the removal of other natural features not identified as key natural heritage features and key hydrologic features is avoided, where*

- possible. Such features should be incorporated into the planning and design of the proposed use wherever possible;*
- iv. except for uses described in and governed by the policies in subsection 4.2.8, the disturbed area, including any buildings and structures, will not exceed 25 per cent of the total developable area, and the impervious surface will not exceed 10 per cent of the total developable area;*
 - v. with respect to golf courses, the disturbed area will not exceed 40 per cent of the total developable area; and*
 - vi. at least 30 per cent of the total developable area will remain or be returned to natural self-sustaining vegetation, except where specified in accordance with the policies in subsection 4.2.8; and*
- b. the full range of existing and new agricultural uses, agriculture related uses, on-farm diversified uses, and normal farm practices are permitted. However, new buildings or structures for agricultural uses, agriculture-related uses, or on-farm diversified uses are not subject to policy 4.2.2.3 a), but are subject to the policies in subsections 4.2.3 and 4.2.4.*
- 4. Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.*
 - 5. Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review.*
 - 6. Beyond the Natural Heritage System for the Growth Plan, including within settlement areas, the municipality:*
 - a. will continue to protect any other natural heritage features and areas in a manner that is consistent with the PPS; and*
 - b. may continue to protect any other natural heritage system or identify new systems in a manner that is consistent with the PPS.*
 - 7. If a settlement area is expanded to include the Natural Heritage System for the Growth Plan in accordance with the policies in subsection 2.2.8, the portion that is within the revised settlement area boundary will:*
 - a. be designated in official plans;*
 - b. no longer be subject to policy 4.2.2.3; and*

- c. *continue to be protected in a manner that ensures that the connectivity between, and diversity and functions of, the natural heritage features and areas will be maintained, restored, or enhanced.*

4.2.3 Key Hydrologic Features, Key Hydrologic Areas and Key Natural Heritage Features

3. *Development or site alteration is not permitted in the vegetation protection zone, with the exception of that described in policy 4.2.3.1 or shoreline development as permitted in accordance with policy 4.2.4.5.*
4. *Notwithstanding policies 4.2.4.1, 4.2.4.2 and 4.2.4.3:*
 - a. *a natural heritage or hydrologic evaluation will not be required for a proposal for development or site alteration on a site where the only key natural heritage feature is the habitat of endangered species and threatened species;*
 - b. *new buildings and structures for agricultural uses, agriculture-related uses, or on-farm diversified uses will not be required to undertake a natural heritage or hydrologic evaluation if a minimum 30 metre vegetation protection zone is provided from a key natural heritage feature or key hydrologic feature; and*
 - c. *uses permitted in accordance with policy 4.2.4.4 b):*
 - i. *are exempt from the requirement of establishing a condition of natural self-sustaining vegetation if the land is, and will continue to be, used for agricultural purposes; and*
 - ii. *will pursue best management practices to protect and restore key natural heritage features, key hydrologic features, and their functions.*

As identified through the Environmental Impact Study (EIS) dated July 30, 2020, prepared by MTE Consultants, the proposed Environmental Policy Area is reflective of the boundary of the Clarkway Tributary Corridor. The EIS concludes:

The proposed development limits avoid direct impacts to protected natural heritage features and recommendations have been provided to protect any adjacent features from indirect impacts. Provided these are met, it is our opinion that the proposed development limits are reflective of the EPA boundary and that the proposed future development will not impact natural features found within the EPA.

The ZBA has demonstrated that with the zone boundary refinement, development will be outside of the natural heritage system and there will be no anticipated negative impacts as a result of future development.

4.2.5 Public Open Space

1. *Municipalities, conservation authorities, non-governmental organizations, and other interested parties are encouraged to develop a system of publicly-accessible parkland, open space, and trails, including in shoreline areas, within the GGH that:*
 - a. *clearly demarcates where public access is and is not permitted;*

- b. is based on a co-ordinated approach to trail planning and development; and*
 - c. is based on good land stewardship practices for public and private lands.*
- 2. Municipalities are encouraged to establish an open space system within settlement areas, which may include opportunities for urban agriculture, rooftop gardens, communal courtyards, and public parks*

As detailed further in this Addendum, the ZBA and the proposed zone boundary adjustments will result in a net increase in lands zoned Environmental Protection Area along the Clarkway Tributary Corridor. It has yet to be established if the municipality or conservation authority intends to obtain ownership of the lands not suitable for development. We note TRCA comment 4: "TRCA supports the conveyance (gratuitous dedication) of natural heritage systems into public ownership. TRCA staff have discussed the gratuitous dedication with the proponent and staff have agreed that the land transfer would occur as a condition of Site Plan approval once the rehabilitation works have been completed and monitored appropriately". Whether the retained environmental protection lands are suitable or desirable for potential public access should be determined by either the municipality or conservation authority, should these lands be dedicated as such.

4.2.6 Agricultural System

The subject lands are not identified for agricultural purposes, and are located within a settlement area.

4.2.7 Cultural Heritage Resources

- 1. Cultural heritage resources will be conserved in order to foster a sense of place and benefit communities, particularly in strategic growth areas.*
- 2. Municipalities will work with stakeholders, as well as First Nations and Métis communities, in developing and implementing official plan policies and strategies for the identification, wise use and management of cultural heritage resources.*
- 3. Municipalities are encouraged to prepare archaeological management plans and municipal cultural plans and consider them in their decision making.*

A Stage 1-2 Archaeological Assessment has been undertaken and submitted as it relates to development of the subject lands. Further archaeological assessment (Stage 3 and 4) is being undertaken in accordance with Ministry standards based on the recommendations from the Stage 1-2 Assessment. Appropriate recommendations/mitigation measures would be established through this assessment process prior to any site disturbance related to development being undertaken.

4.2.10 Climate Change

- 1. Upper- and single-tier municipalities will develop policies in their official plans to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with other provincial plans and policies for environmental protection, that will include:*
 - a. supporting the achievement of complete communities as well as the minimum intensification and density targets in this Plan;*

- b. reducing dependence on the automobile and supporting existing and planned transit and active transportation;*
 - c. assessing infrastructure risks and vulnerabilities and identifying actions and investments to address these challenges;*
 - d. undertaking stormwater management planning in a manner that assesses the impacts of extreme weather events and incorporates appropriate green infrastructure and low impact development;*
 - e. recognizing the importance of watershed planning for the protection of the quality and quantity of water and the identification and protection of hydrologic features and areas;*
 - f. protecting the Natural Heritage System for the Growth Plan and water resource systems;*
 - g. promoting local food, food security, and soil health, and protecting the agricultural land base;*
 - h. providing direction that supports a culture of conservation in accordance with the policies in subsection 4.2.9; and*
 - i. any additional policies to reduce greenhouse gas emissions and build resilience, as appropriate, provided they do not conflict with this Plan.*
- 2. In planning to reduce greenhouse gas emissions and address the impacts of a changing climate, municipalities are encouraged to:*
 - a. develop strategies to reduce greenhouse gas emissions and improve resilience through the identification of vulnerabilities to climate change, land use planning, planning for infrastructure, including transit and energy, green infrastructure, and low impact development, and the conservation objectives in policy 4.2.9.1;*
 - b. develop greenhouse gas inventories for transportation, buildings, waste management and municipal operations; and*
 - c. establish municipal interim and long-term greenhouse gas emission reduction targets that support provincial targets and reflect consideration of the goal of low-carbon communities and monitor and report on progress made towards the achievement of these targets.*

The proposed development conforms with the Town of Caledon Official Plan, including policies related to a changing climate. Specific opportunities for complimentary green infrastructure will be evaluated through the detailed design phase of the development under an application for Site Plan Approval. On a preliminary basis, climate change initiatives to be incorporated into the future site design may include LID and quantity/quality control.

TOWN OF CALEDON OFFICIAL PLAN

An analysis of the Town of Caledon Official Plan was provided in our July 2020 Planning Justification Report. Based on Staff feedback, further analysis was requested with respect to certain policies, including the following:

- *As more detailed environmental information becomes available, such as information derived from approved studies or site investigations/inspections, minor refinements to the limits of lands designated EPA on the Schedules to this Plan, including minor additions or deletions, may be permitted without an amendment to this Plan, provided such a minor refinement is satisfactory to the Town and other relevant agencies.*

Where lands designated EPA are located within the ORMCPA, where such refinement to the limits of lands designated EPA or extent of the feature is proposed for a wetland, area of natural and scientific interest and/or significant portions of the habitat of endangered, rare and threatened species, or their related minimum vegetation protection zones, then formal confirmation of said refinement is required from the Province prior to any development. In addition, where said evaluation results in greater minimum vegetation protection zone than is required by the policies of the ORMCP, the greater standard shall be used. All development shall be prohibited within the greater minimum vegetation protection zone as established, except as otherwise permitted by this Plan (Policy 5.7.3.1.4).

As identified through the EIS prepared by MTE Consultants, the Environmental Policy Area is reflective of the boundary of the Clarkway Tributary Corridor. As noted by the EIS, the Town of Caledon Official Plan Section 7.15.8.3.8 states that the limit of the Natural System (EPA) shall be determined by the greatest outer limit of the natural feature and/or natural hazard to development or site alteration as follows:

- A 10 m buffer from the greater of the long term stable top of slope/bank, stable toe of slope, regulatory floodplain, meander belt, and any contiguous natural feature;
- 10 m buffer from the dripline and any contiguous natural feature;
- 30 m buffer from Provincially Significant Wetlands (PSW); and
- 10 m buffer for all other wetlands.

The EIS goes on to detail the identified setbacks from natural heritage features and the potential direct and indirect impacts to these features in relation to the defined limit of development. The EIS presents avoidance, protection, and mitigation measures for the impacts where appropriate, noting that additional recommendations will be provided at Site Plan approval, once detailed design information is known.

The EIS indicates that the proposed zone boundary development limits are primarily guided by the 10 m floodplain setback as this is the natural feature/hazard at the greatest outer extent. The proposed wetland setback limit would be protected within the 10 m floodplain setback limit. The EIS states that "The proposed refinement of the zoning boundary will ensure the protection of the features identified within the EPA" (p. 5).

The EIS concludes on pages 5-6:

The proposed development limits avoid direct impacts to protected natural heritage features and recommendations have been provided to protect any adjacent features from indirect impacts. Provided these are met, it is our opinion that the proposed development limits are reflective of the EPA boundary and that

the proposed future development will not impact natural features found within the EPA.

In consideration of the above, the zone boundary refinement can be considered minor. The Caledon OP does not define or specify what constitutes a 'minor refinement'. In considering that there is net gain in EPA lands (as is detailed below), that the prescribed 10 m floodplain setback is to be established, and that appropriate mitigation measures can be implemented to ensure no direct or indirect impacts to the EPA lands, it is our opinion that the proposed boundary refinement can be considered minor.

Further analysis was requested for the following policies:

- *Employment land development shall be permitted in accordance with the policies of Section 5.5 as well as the following specific policies (Policy 7.15.7.1).*
- *Development shall only be permitted on full municipal services including sanitary and storm sewers, stormwater management facilities, municipal and private roads, municipal water, hydro and other utilities (Policy 7.15.7.1.1).*
- *All development in the Secondary Plan Area shall be serviced by full municipal water and sanitary sewers, municipal roads, hydro, fiber optic trenches and other utilities (Policy 7.15.11.1).*

As demonstrated by the Functional Servicing Report and Storm Water Management Design Brief prepared by The Odan/Detech Group Inc., the site is serviceable for sanitary, stormwater, and water supply generally by way of extension of existing infrastructure to allow for connections. Gas and hydro infrastructure connections are also available to the subject lands. The subject lands will be on full services upon development.

DRAFT ZONING BY-LAW AMENDMENT

The draft Zoning By-law text and schedule have been revised in response to Staff comments, as well as in consideration of future site design matters, and where possible in coordination with Staff,. The lands located to the west are longstanding agricultural uses, without the presence of a residential use. The existing zoning by-law seeks to protect existing residentially zoned properties from the encroachment of employment type uses. In consideration of future processes to expand the municipal boundary to the west, it is important to ensure the vitality of the existing employment land base. Accordingly, the ZBA text has been updated to include the following related provisions:

- ***Interior Side Yard (Minimum)***
From an *interior side lot line* abutting a Residential zone or a *lot* containing a Residential use: 3.0m
- ***Planting Strip Location***
Any required *planting strip* located along an *interior side yard* shall have a minimum width of 3.0m, except where a lot line abuts an EPA-1 Zone the required *planting strip* minimum width shall be reduced by 50%.

Based on the zoning schedule, there is a net increase of 3,147.77 sq.m lands zoned as EPA1, based on the following:

- MS 579 and MP 580 to EPA1: approx. 8,921.21 sq. m
- EPA1 to MS XXX and MP XXX: approx. 5,773.44 sq. m

March 5, 2021 March 10, 2021

ADDITIONAL CONSIDERATIONS

Staff comments note that Section 4.2 of the July 2020 Planning Justification Report reference the subject lands as having frontage along Coleraine Drive. For clarification, it is noted that the subject lands have frontage along Healey Road, west of Coleraine Drive.

CONCLUSION

It continues to be our opinion that the proposed development is in the public interest and represents good planning principles. It is our opinion that the revised submission is consistent with the 2020 PPS and the 2019 Growth Plan, and that the proposal is in conformity with the Halton Region Official Plan and Town of Caledon Official Plan.

We appreciate the opportunity to provide the preceding additional information and justification regarding the proposed development in light of ongoing feedback.

If you have any questions or if you would like to discuss further, do not hesitate to contact the undersigned.

Yours very truly,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Senior Associate

cc. 8281 Healey Road GP Limited