

Date: March 18, 2025

To: Genevieve Scott, Senior Planner, Cuesta Planning Consultants Inc., on behalf of Planning Department, Town of Caledon

cc.: Kyle Munro, Community Planner, Policy & Heritage; Cassandra Jasinski, Heritage Planner, Policy & Heritage, Planning Department

From: Sally Drummond, Senior Heritage Planner, Policy & Heritage, Planning Department

Subject: **Heritage Comments**
Official Plan Amendment and Zoning By-law Amendment – 2nd Submission
Glen Schnarr & Associates on behalf of CBM Aggregates/St. Mary's Cement Inc. (Canada)
18667 Mississauga Road, 18722 Main Street, 18501 Mississauga Road, 1055 Charleston Sideroad, 18221 Mississauga Road, 1455 Charleston Sideroad, and 1420 Charleston Sideroad
Part Lot 17 Concession 4 WHS, Part Lot 17 Concession 4 WHS, Part Lot 16 Concession 4 WHS, Part Lot 16 Concession 4 WHS, being Part 1 on Reference Plan 43R-24507, Part Lot 16 Concession 4 WHS, PCL 14-8, SEC 43-CALEDON-4 (W.H.S.), PCL 14-8, SEC 43-CALEDON-4 (W.H.S.)
File No.: POPA 2022-0006 and RZ 2022-0010

Further to review of the second submission materials for the above noted applications, below are Heritage staff comments on the following:

- A. Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment, revision dated 21 July 2023
- B. Heritage Impact Assessment reports for 18667 Mississauga Road, 18501 Mississauga Road, 1420 Charleston Sideroad, 18722 Main Street, and 1055 Charleston Sideroad, dated July 28, 2023
- C. MCM compliance letter for Stage 1-2 Archaeological Assessment report

A. Cultural Heritage Report (revised)

1. The Town acknowledges the WSP cover letter, dated August 21, 2023, stating that the technical recommendations of the revised CHR (revised July 2023) are superseded by the recommendations of the property specific HIAs.

2. Accordingly, the Town limits its comments on the CHR to the following, which may be addressed by an Addendum Letter:
 - a. change in heritage status of the properties at 18473 Main Street and 1626 Charleston Sideroad, now designated under Part IV of the Ontario Heritage Act.
 - b. Rationale for 50 m no-go construction buffer
 - c. Rationale for 60 m vibration buffer
 - d. Rationale for determining fugitive dust impacts
 - e. Explanation of blast impact assessment

B. Heritage Impact Assessment (HIA) reports:

General Comments

3. The Town is in agreement regarding the following principal conservation measures being proposed for the five properties within the subject lands identified as having cultural heritage resources:
 - i. 18667 Mississauga Road:
 1. relocation of farmhouse within the subject lands to front onto Mississauga Road;
 2. documentation and salvage of outbuildings and impacted landscape elements.
 3. Designation under Part IV of the Ontario Heritage Act (OHA)
 - ii. 18501 Mississauga Road:
 1. relocation of farmhouse within the subject lands to front onto Mississauga Road;
 2. salvage and commemoration of outbuildings and mature vegetation.
 3. Designation under Part IV of the OHA
 - iii. 1420 Charleston Sideroad:
 1. retention in situ of farmhouse and landscape elements
 2. adaptive re-use of farmhouse as site office/laboratory for duration of operation.
 3. Designation under Part IV of the OHA
 - iv. 18722 Main Street:
 1. retention in situ of farmhouse and outbuildings for continued residential use.
 2. Designation under Part IV of the OHA
 - v. 1055 Charleston Sideroad:
 1. documentation, salvage and commemoration of outbuilding foundations.
4. Further to receipt of the HIAs and pursuant to the recommendations, the Town issued Notices of Intention to Designate the following four properties:
 - i. 18667 Mississauga Road
 - ii. 18501 Mississauga Road
 - iii. 1420 Charleston Sideroad
 - iv. 18722 Main Street

5. The Town has subsequently entered into a Heritage Designation By-law Extension Agreement with the Owner for each of these properties to continue conservation strategies and extend timing for passing of the designation by-laws.
6. The Town has been meeting regularly with GSAI and the applicant's heritage consultants regarding implementation processes and timelines for the proposed heritage conservation measures. Among other things, these meetings have identified the need for preparation of reference plans and Heritage Easement Agreements for the four properties to be designated, and Heritage Permits for implementation of the Heritage Conservation Plan work and building relocations.
7. A draft Heritage Easement Agreement (HEA) template, prepared by the Town, is under review by the applicant's legal team . It is anticipated that the HEAs will be entered into upon completion of the reference plans.

Comments Applicable to All HIAs:

8. Please revise the five HIAs based on the comments below and on the attached PDFs.
9. Identify the proposed extraction phase in which each Study Area is located, as it is understood that the phasing will affect timing of implementation of conservation recommendations.
10. Figures:
 - Revise list of figures in Indexes, as not all are included (typically missing Figs 10-12)
 - Figure numbers and titles are hard to find/read (especially Fig 2 onwards). Please revise figure layout to place the figure number and title closer together and make them more prominent.
 - Figure 1 – on legend, revise 'Limit of Extraction' to 'Proposed Limit of Extraction' as the aggregate application is not yet approved
 - Figure 3 – revise title to '1859 Tremaine Map of the County of Peel'
 - Figure 4 – revise title to '1877 Historical Atlas of Peel County'
 - Figure 5 – revise title to '1937 Topographic Map' and include source
 - Figure 7 – revise title to '1954 Aerial Photograph' and include source
 - Figure 8 – revise title to '1973 Topographic Map' and include source
 - Figure 9 – revise title to '1994 Topographic Map' and include source
 - revise additional figures in similar fashion where necessary
 - Add Figures using selections from the 1980s-1990s aerial photographs provided by the Town. The site information provided in these aerial photographs is pertinent to revisions requested in the HIAs regarding dating of some site structures.
 - Add Figure showing proposed extraction phasing plan to help illustrate timing of anticipated impacts to the individual Study Areas.
11. Section 2.1 Regulatory Requirements: add reference to Aggregate Resources Act requirements for cultural heritage assessments, as had been identified in section 3.2.1 of the Cultural Heritage Report.
12. Section 2.1.1 Provincial Policy Statement: update to PPS 2024
13. Section 2.1.2 OHA: update to reflect more recent OHA amendments regarding Bill 23 and Bill 200

14. Section 2.1.4 Town of Caledon Official Plan: add reference to Future Caledon Official Plan policies where appropriate as this new OP was approved by Council in May 2024 and approval by the Province is expected imminently.
15. Section 2.3 Background Research: at end of first paragraph, revise 1858 date to 1859 to reflect correct date of Tremaine's Map of the County of Peel.
16. Section 2.6 Cultural Heritage Evaluation: review and revise the last sentence regarding the section of the report in which the results are provided, as every report identifies the incorrect section.
17. Table 2: revise title to include 'Aerial Photographs' and revise table to include selected 1980s-90s air photos.
18. See editorial comments made in the following sections of the 18667 Mississauga Road report that are common to these sections in all of the HIA reports:
 - a. Section 2.8 Mitigation Measures
 - b. Section 3.1 Physiography
 - c. Section 3.2 Indigenous Land Use
 - d. Section 3.3.2 Town of Caledon and Former Township of Caledon
 - e. Section 4.2.1 Location Context
19. Section 4.2.3: review description of the orientation of the farmhouses for consistency. All HIAs note the orientation will be described as north-south 'for ease of description', which makes sense, however this is then applied differently. For 18501 Mississauga, 1055 Charleston and 1420 Charleston north-south is aligned with the concession roads (i.e. Mississauga Rd), whereas for 18667 Mississauga and 18722 Main Street it is aligned with the sideroad (Charleston).
20. Section 5.2.4 summary statement that the study areas 'do not meet criteria for consideration as CHLs' is not substantiated by any CHL evaluation, apart from an earlier statement that these properties were not identified in the Town's CHL Inventory. The Town's CHL Inventory report acknowledges that the inventory was done at a high level and speaks to additional potential CHLs being identified through further evaluation of individual properties or areas; farmsteads are often described in CHERs as CHLs.
21. Table 6: Indirect Impact re change in land use: Town disagrees with 'no impact' conclusion since the proposed land use requires rezoning and will result in a clear change in land use. Table 3 of the CHR also concludes that isolation is anticipated for the subject properties.
22. Further to comment 2b) above, provide explanation for 50 metre no-go buffer as being an appropriate protection distance for cultural resources for construction activities related to blasting quarry.
23. Further to comment 2e) above, provide explanation of a blast impact assessment prior to inclusion of this measure in Section 8.
 - a. What is it, who undertakes it, timing and frequency of testing over duration of operation, monitoring, requirement for results to be shared with Town etc.
24. Provide explanation of a vibration monitoring plan prior to inclusion of this measure in Section 8.
 - a. What is it, who undertakes it, timing and frequency of testing over duration of operation, how are outcomes communicated/recorded, monitoring, requirement for results to be shared with Town etc.
 - b. Further to comment 2c) above, explain/substantiate appropriateness of 60 m zone for vibration monitoring noted in Cultural Heritage Report

25. Further to comment d) above, address fugitive dust impacts noted in Cultural Heritage Report and identify potential mitigation measures for 18667 Mississauga Road, 18501 Mississauga Road, 1420 Charleston Sideroad, 18722 Main Street.
26. Update/reorganize Section 8 to reflect outcomes of the on-going discussion between the Town and the applicant regarding status/timing of conservation measures and individual comments made on attached PDFs:
 - a. Status of designation process under Part IV of the OHA for 18667 Mississauga Road, 18501 Mississauga Road, 1420 Charleston Sideroad, 18722 Main Street and when to be completed.
 - b. Preparation of reference plans for above-noted properties denoting property boundaries to which the designation by-laws will apply and relocation sites.
 - c. Requirement for Heritage Easement Agreements to be registered on title for the above-noted properties until:
 - i. relocations completed
 - ii. properties inhabited
 - iii. designation by-laws passed
 - d. Heritage Conservation Plans for above-noted properties shall be completed in accordance with scope of work approved by the Town.
 - e. Acknowledgement that relocation of farmhouses at 18501 and 18667 Mississauga Road shall not occur until aggregate license and planning approvals are in place.
 - f. Requirement of Heritage Permits for implementation of approved Heritage Conservation Plans, relocation of buildings, salvage/dismantling of outbuildings.
27. Provide all photographs of the cultural heritage resources to the Town in digital format.
28. The statements of cultural heritage value and interest and list of heritage attributes will require some minor revisions, as noted, prior to passing of the designation by-laws.

Comments Applicable to Individual HIAs:

18667 Mississauga Road

29. See comments on marked-up PDF copy of HIA, attached.
30. Include any May 2023 site visit photos, if summer conditions revealed further structural details
31. Provide sketch of floor plans to assist in understanding interior descriptions

18501 Mississauga Road

32. See comments on marked-up PDF copy of HIA, attached.
33. Additional information provided by the Town:
 - a. Region of Peel Archives records noting Cameron being on Lot 16 Con 4 WHS in **1833** and involved with Reform Party:
File Box: Politics – General Historical Write-ups of Peel Politics 1792-1837; Folio 15, page 7
 - i. *Colonial Advocate* December 14, 1833, page 7
 1. ***public meeting held at house of Mr. Cameron, Lot 16 Concession 4 WHS, Caledon Township***

2. respectable body of Presbyterians
 3. resolution of meeting: to approve the measures taken and opinions advocated by William Lyon McKenzie and the Reform Party of the House of Assembly
 4. Alexander Clunes, President, and Daniel McDonald, Secretary,
 5. Dated November 23, 1833.
34. Include any May 2023 site visit photos, if summer conditions revealed further structural details
35. Provide sketch of floor plans to assist in understanding interior descriptions

1420 Charleston Sideroad

36. See comments on marked-up PDF copy of HIA, attached.
37. Additional information provided by the Town:
- a. 1964 photo of barn fire from *Answering the Call: A History of Firefighting in the Town of Caledon*
 - b. Caledon Heritage Foundation history of ghost hamlet of Coulterville, page 19: note comment in oral history from Carol Coulter Crews [lived on adjacent farm at 18473 Main Street] that from the Cameron barn fire they only managed to save the tractor, which was in the garage. <https://caledonheritagefoundation.com/ghost-settlement-coulterville/>
38. Through on-going discussions, the applicant has agreed to the following:
- a. Revision of the limit of extraction to allow retention of the barn foundations
 - b. Termination of the proposed perimeter berm along Charleston Sideroad at the edges of the property to keep the road frontage and site lines to the farmhouse clear.

18722 Main Street

39. See comments on marked-up PDF copy of HIA, attached.
40. Through on-going discussions, the applicant confirmed that the proposed perimeter berm separating the extraction area from this property is designed to be a minimum of 3 metres from the end gable wall of the barn, allowing sufficient room for future maintenance of the barn, with drainage sloped eastward to Main Street. Town engineering staff has confirmed that this berm design is satisfactory to ensure appropriate drainage away from the barn foundations.

1055 Charleston Sideroad

41. See comments on marked-up PDF copy of HIA, attached.
42. Revise the timelines for implementation of the conservation recommendations, as documentation and identification of salvageable materials and the proposed method of commemoration needs to be considered through the planning application process.

C. Stages 1&2 Archaeological Assessment Report

43. Further to the Town's receipt of a number of Stage 3 Archaeological Assessment reports, dated August 2024, please provide updated Indigenous Engagement logs and all Supplementary Documentation materials.
44. No demolition, construction, grading or other soil disturbances shall take place on the subject lands prior to the Town of Caledon Heritage staff receiving, to their satisfaction, all completed archaeological assessment(s) and the MCM compliance letter(s) indicating that all archaeological licensing and technical review requirements have been satisfied and the report(s) has been entered into the Public Registry.

Please let me know if you have any questions or concerns.

Sincerely,



Sally Drummond MA, CAHP
Senior Heritage Planner
Policy & Heritage
Planning Department
TOWN OF CALEDON