



CBM-Caledon Quarry

CAART COMMENT SUMMARY TABLE RESPONSE #1 – [VISUAL IMPACT]

Please accept the following as feedback from the Caledon Aggregate Review Team (CAART). Fully addressing each comment will expedite the potential for resolution of the consolidated CAART comments and individual agency objections. **Additional comments may be provided once a response has been prepared to the comments raised below and additional information provided.**

Colour Code	Description
	Resolved
	Resolved subject to additional information being provided to CAART Reviewers (e.g, Implementation Guide, Report Addendums)
(no colour)	Response provided, but no further action taken or required by Project Team

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Methodology and Accuracy							
1.	The full extent of the applicant’s holdings is not clearly indicated in the VIA Report and Landscape Plans. The boundary, extraction areas, entrance road and landscape remediation areas should be clearly shown. Natural features to remain should be clearly shown including roadside vegetation, tree stands, home gardens, plantations, wetlands, orchards, etc.	VIA Peer Review Item 5.2.1, pg.2 Item 5.2.3, pg. 16	<p>The extraction areas, entrance road, additional lands owned/controlled by CBM and the full extent of the applicant’s property holdings have been added to Figure 1 in the VIA Addendum [all figures referred to are in the original 2023 VIA report or the VIA Addendum, as referenced herein].</p> <p>The Aggregate Resources Act (ARA) requirement for Site Plans is to only show what’s within 120 m of the proposed licence boundary. Therefore, the applicant’s holdings are not required to be indicated beyond 120 m of the licensed boundary in the MHBC ARA Site Plans.</p> <p>The landscape remediation (rehabilitation) areas are shown, Figure 1, Planting Areas, in the 2023 VIA report.</p> <p>CBM has control over lands they own and can maintain vegetation and design visual screens within these areas. All natural features, including vegetation and tree stands within the 3-metre-wide buffer, between the berms and license boundary (property limits) will be retained, etc.</p> <p>There are areas where vegetation (i.e., woodland, hedge rows, tree stands, plantations) remains outside of the extraction limit yet within the Licence area and are coincident with off-site viewsheds as illustrated on Figure 1 in the VIA Addendum. There is one wetland to the west of phase 4 and outside the extraction limit that remains within the Licence</p>				

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			area. There are also vegetated areas on other adjacent lands owned by CBM but not part of the licensed area and shown on Figure 1 in the VIA Addendum. There are no known orchards or gardens that would significantly influence the outcome of the visual impact assessment.				
2.	Viewsheds observed in the field differ from the mapped viewsheds in the Golder VIA Report. In some instances, observed viewsheds were larger, and in others they were smaller. Ground-proofing of viewsheds is necessary to ensure the extent of viewsheds are properly mapped.	VIA Peer Review Section 6, Item 5, pg. 21	An individual plan-view of each viewshed and the location of the cross-section line has been prepared for each individual viewpoint maps and shown in Figures 3 through 16 in the VIA Addendum.  Ground proofing of the existing viewsheds was conducted in field during the photographic field survey and the photos depict the visible extent for the viewsheds. The extent of each viewshed is clearer now with the separate mapping for each viewpoint.				
3.	Two viewpoints that offer panoramic and direct views of the extraction area were identified in the field but are not included in the VIA report.	VIA Peer Review Item 5.1, pg. 16	Viewpoints at public parking lots located on both sides of Charleston, northeast of the Credit River will not have a view of the Project. Adding an additional viewpoint at the south boundary of the North Extraction Area on Charleston Sideroad will not change the overall weak contrast rating for the effects assessment.				
4.	Viewshed elevation drawings only illustrate sightlines from a 1.5m height. Viewsheds should be illustrated using a “cone” shape to illustrate the full extent of the view when the observer tilts the head up and down.	Table 2, Item D.6, pg. 5; Item D.5 and Figure 2 on pg. 6	The cross-sections were initially created for review by the Niagara Escarpment Commission (NEC) in accordance with their Visual Impact Assessment Technical Criteria. However, as stated in the NEC response to MHBC, dated Aug. 23 <sup>rd</sup> , 2024, <i>‘NEC has reviewed the additional information related to the Visual Impact Assessment (VIA) included in the response. While it is acknowledged that the location of the proposed Caledon Pit/Quarry is outside of the Niagara Escarpment Plan (NEP) area and the Development Criteria within Part 2 of the NEP would not apply, NEC encourages that where development is adjacent to the NEP area consideration is given to mitigating visual impacts on the natural scenery and open landscape character of the Escarpment. NEC is aware that a peer review of the VIA is currently being carried out by the Town of Caledon which may identify additional requirements or recommendations for screening, planting or other approaches to mitigate impacts to scenic resources.’</i> WSP continues to recommend measures to mitigate visual impacts on the natural scenery and open landscape character of this area; however, it is noted that Niagara Escarpment Plan (NEP) policies and technical visual impact criteria do not apply to the lands subject to this application because they are lands outside of NEC jurisdiction. In this regard, WSP has not undertaken further additional modifications to the cross-section maps or figures based on what is in the NEC technical criteria. Also, it is important to note that if a cross-section line is angled slightly different, for example, 5 degrees to one side or the other, the result can be an almost completely				

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			<p>different looking cross-section, and numerous cross-sections would be required to accurately reflect the field of view that the human eye would see. Photographic simulations have generally replaced cross-sections for VIAs and provide a more realistic and easily understandable representation of proposed projects. WSP has recommended some of the following measures to mitigate visual impacts on the natural scenery and open landscape character of the NEP area.</p> <ol style="list-style-type: none"> <li>1. The berms will be planted with grass species that is indigenous to the area and is very similar to the grass currently growing along roadsides throughout rural Caledon. Therefore, there will be less visual contrast between the berms and the surrounding landscape.</li> <li>2. The meadow that is proposed within the NEP, adjacent to Cataract and shown on Figure 2 in the VIA Addendum will provide opportunity for maintaining the open landscape character of these lands.</li> <li>3. Creating woodland within the NEP, and adjacent to Cataract as shown on Figure 2 in the VIA Addendum will provide screening and separation between the proposed quarry and Cataract, in the form of an upland forest. The upland forest will be planted with species that are indigenous to the area and be congruent with the surrounding natural scenery that also includes woodlots and forested areas.</li> </ol>				
5.	The extent of several viewpoints calculated using GIS and Digital Terrain Models differs from viewsheds observed in the field. All GIS-generated viewsheds should be verified in the field.	5 <sup>th</sup> bullet point on pg. 12	DTM data was used to validate some existing ground surface elevations and align the 3D modelling environment, however the viewshed analysis was conducted with a digital surface model (DSM), not DTM data. The DSM data from the MNR was the best available data to use at the time for the viewshed analysis and captures all surface features. (i.e., vegetation, trees, buildings) as well as the topography. The DSM is used for viewshed analysis because the surface features (such as buildings) may act as a visual screen and reflect the reality of what the viewer is seeing.				
6.	The Digital Visibility Map illustrates all viewsheds on the same map, making it difficult to interpret the visual impact from any single viewpoint. A map of each viewpoint in plan view would illustrate the full extent of the viewshed from each single viewpoint. The timeframe for planting should be included for each phase or viewpoint to demonstrate that,	Table 2, Item D.1, pg. 4; Item A.3 on pg. 5; 5 <sup>th</sup> bullet point on pg. 12	<p>Please refer to response #2 regarding viewshed mapping.</p> <p>As stated in response to NEC comments, <i>'all visual plantings in the Main Area will occur within one year of issuance of the licence and for the North and South Areas within 5 years of issuance of the licence.'</i></p>				

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	prior to the beginning of each extraction phase, planting will be of sufficient size to create an effective visual screen and/or enhance visual quality.						
7.	Submission does not include a detailed landscape plan and grading plan for the quarry entrance, berms and road cross-sections. As currently shown, there will be significant views into the extraction area from the roadway.	Table 2, Item E.1, pg. 5	WSP has created a conceptual landscape architecture plan of the front entrance. A 2D cross-section has also been created for the front entrance. The simulation for the front entrance has been modified and assessed in the VIA Addendum. The landscape architecture plan and cross-sections for the front entrance are also provided in the VIA Addendum. Any internal roads and structures will be temporary and will not be visible. Site plans showing temporary roads and structures are not a requirement of the ARA process and not agreed to in the Terms of Reference (TOR).				
8.	The Landscape Plans do not show a treatment for each of the 6 extraction stages. It is unclear whether sufficient landscape mitigation will be in place at the beginning of each extraction stage. For each viewpoint, a distinct viewshed map in plan view and a line indicating the extent of the cross-section should be provided.	Item E.1, pg. 6 Item 2, pg. 6; 3 <sup>rd</sup> and 4 <sup>th</sup> bullet point on page 12	Please refer to response #2 regarding viewshed mapping.  As stated in response to NEC comments, <i>'all visual plantings in the Main Area will occur within one year of issuance of the licence and for the North and South Areas within 5 years of issuance of the licence.'</i>				
9.	Architectural plans of proposed structures and interior roads were not provided so an assessment of visibility and visual impact cannot be made.	Table 2, Item B.2, pg. 4	Any internal roads, tunnels, equipment and structures will be temporary and will not be visible. Site plans showing temporary roads and structures are not a requirement of the ARA Site Plans and not agreed to in the TOR.				
10.	Each cross-section should display the extent of the view only. The vertical and horizontal scales should be equal.	Item 3, pg. 6	Please refer to response #4 regarding cross-sections.  As seen in the photo simulations from viewpoint 9, a viewer would have visibility across agricultural fields, over Charleston Sideroad and likely all the way to the northern licence boundary. If the cross section for viewpoint 9 were to be reduced to a 1 to 1 scale, the visible level of details across the landscape would be very low, almost indiscernible, as depicted in Figure 18 in the VIA Addendum.				
11.	The VIA Report lacks an overall site plan including the extent of the applicant's land holdings, extent of the quarry operations, internal roads, underground	Item B.1, pg. 5	The extraction areas, entrance road, additional lands owned/controlled by CBM and the full extent of the applicant's property holdings have been added to Figure 1 in the VIA Addendum.				

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	tunnels, noise barriers, temporary and permanent buildings.		Any internal roads, tunnels and structures will be temporary and will not be visible. Site plans showing temporary roads and structures are not a requirement of the ARA Site Plans and not agreed to in the TOR.  Noise barriers are the berms shown in Figure 1 in the VIA Addendum. Noise mitigation is further discussed in the Noise Impact Assessment (WSP, July 2023).				
12.	The VIA does not refer to whether the landscape treatment to address visibility and visual impact complies with the Niagara Escarpment Plan, Caledon Official Plan, PPS.	Item B.4, pg. 5	<p>The TOR for the VIA agreed to follow the Town of Caledon Official Plan, including sections 5.11.2.4 and 5.11.2.4.11. WSP has completed a Visual Impact Report as described by Section 5.11.2.4.2(e) which and demonstrated that the proposal will not have any unacceptable impacts.</p> <p>Also agreed to in the TOR, the VIA was to address section 5.11.2.4.11 below.</p> <p>The Visual Impact Report required by Section 5.11.2.4.2(e) shall address the following:</p> <p><i>a) Assess the significant views and how they might be affected by the proposed extractive operation;</i></p> <p>This has been addressed by WSP in the VIA report by following professional assessment frameworks that provide standard criteria, techniques, and mitigation measure to evaluate and address potential site effects to visual quality. The frameworks used in this assessment are from:</p> <ol style="list-style-type: none"> <li>1. The Landscape Institute and Institute of Environment Management and Assessment's Guidelines for Landscape and Visual Impact Assessment (LI/IEMA 2013);</li> <li>2. Elements of the United States Bureau of Land Management's Visual Resource Management Systems (USDI 1986);</li> <li>3. Generally following the NEC Visual Impact Assessment Technical Criteria (2020); and</li> <li>4. Professional judgement and experience from conducting previous visual impact assessments.</li> </ol> <p>The elemental steps involved were to first conduct a desktop visibility analysis to determine the visibility of site features and their visual prominence from highly visible viewpoints. The degree of visual contrast was determined based on visually referencing the photo-composite simulations and evaluating the site's visual character to determine the compatibility of the Site with the visual characteristics of the existing landscape setting.</p> <p><i>b) Assess the changes to the natural landscape and the cultural landscape that would result from the operation.</i></p> <p>Changes to the natural landscape has been addressed in the WSP VIA report by first establishing the existing landscape character, which includes natural and man-made features, then evaluating how the</p>				

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			<p>Project would contrast with the existing landscape character, or in effect, how the project would change the visual aesthetics of the natural landscape.</p> <p>Additional reporting has been added to address the cultural landscape in the VIA Addendum, such as describing the style and cultural heritage value of farm structures within the cultural landscape. As well, the berm originally proposed along Charleston Sideroad in vicinity of (and encroaching within) the frontage of 1420 Charleston Road has been pulled back away from that property's frontage, to allow continued access of the view to the dwelling on the property. Some context has been given regarding the Canada's Historic Places (CHP) Standards and Guidelines that define three conservation treatments, preservation, rehabilitation, and restoration of heritage properties with reference to the WSP Cultural Heritage Report.</p> <p>Also addressed in WSP's Cultural Heritage Report (July 2023) is Region of Peel Official Plan, (Nov. 2022, Glossary pg. 273,) definition of "Heritage attributes": <i>the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and may include the property's built, constructed, or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (e.g. views or vistas to or from a protected heritage property).</i></p> <p><i>c) Identification of any required mitigation measures, and the visual character of such measures. This may include berms, entrance designs, vegetation, landscaping, and operational matters such as small phases, screening of equipment, direction of extraction which would seek to minimize visual impacts.</i></p> <p>This has been addressed in the Addendum report with respect to the cultural heritage landscape in terms of mitigation measures related to the proposed eventual relocation of the houses at 18667 and 18501 Mississauga Rd. within their original land parcels to preserve the contextual, historical and visual aesthetic linkages to other similar heritage properties within the area. Also, preserving the view and aesthetic appeal of the property of 1420 Charleston Sideroad by removing a portion of the proposed berm along the full frontage of the property.</p> <p>Other mitigation measures have already been addressed in the VIA report, such as the screening of any internal roads, tunnels, equipment and the fact that structures will be temporary and will not be visible due to screening from the berm and visual planting. Other mitigation measures have been expanded upon in the addendum, such as planting berms with grass species that is indigenous to the area and is very similar to the grass currently growing along roadsides. The front entrance has been redesigned to mitigate any views into the quarry.</p>				

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			<p>Please refer to response #23 regarding addressing and protecting significant views through mitigation for the proposed Caledon Pit / Quarry, including the minimizing or mitigating changes to the natural landscape and the cultural landscape.</p> <p>Please refer to response #4 regarding applicability of the NEP.</p> <p>Consistency with the PPS is addressed in detail in the Planning Justification Report (GSAI, 2023) (PJR) and in the PJR Addendum (GSAI, May, 2025). Policy directives related specifically to visual impacts or visual aesthetics are not contained within the PPS</p>				
13.	Information in the Landscape Plan, VIA Report and Planning Justification Report is inconsistent with regard to location of landscape plantings, size, spacing , species and planting techniques, making the visual impact difficult to assess.	Item E.1, pg. 6	<p>As stated in response to NEC comments, '<i>all visual plantings in the Main Area will occur within one year of issuance of the licence and for the North and South Areas within 5 years of issuance of the licence.</i>'</p> <p>Location of the landscape plantings are already depicted in Figure 1, Planting Areas, in the 2023 VIA report</p>				
14.	There is insufficient public consultation and stakeholder engagement to assess community concerns about visual impacts.	Pg. 3	<p>CBM has hosted 8 Public Information Sessions on the project (three sessions on March 9 and 10, 2021; one session on April 7, 2021; one session on Dec 1, 2021; one session Sept 7, 2022; one on Oct. 25, 2023, and one on March 20, 2025) and participated in one in-person public meeting hosted by the Town of Caledon on June 20, 2023, to date. All presentations (and technical reports including the VIA) and contact information for questions have been posted on the CBM Caledon Web Site. A second in-person public meeting hosted by the Town is anticipated in early 2026.</p>				
<b>Proposed Landscape Treatment to Screen Views and Improve Visual Character and Quality</b>							
15.	As illustrated in the VIA Report and Landscape Plans, uniform berms of 5-7m in height seeded with grass lack visual character and should be modified to increase visual quality in order to comply with Town of Caledon Official Plan.	8 <sup>th</sup> bullet point on pg. 12	<p>The berms are similar to those at other permitted gravel pits in the vicinity (e.g., nearby Lafarge Lawford Pit at 2460 Charleston Sideroad) where there are no unacceptable visual impacts, in accordance with the Town of Caledon Official Plan, section 5.11.2.4.11. The berms will be planted with grass species that is indigenous to the area and is very similar to the grass currently growing along roadsides. Therefore, there will be less visual contrast between the berms and the surrounding landscape.</p>				

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16.	The Landscape Plans do not illustrate an interim or end-result landscape that complies with landscape connectivity policies and a requirement for 35% naturalization in the Greenbelt Plan, resulting in a landscape of reduced visual quality.	Item .3, pg. 13-14 Item .4b) on pg. 14 Item 5.7, pg. 20	<p>As noted in the PJR (rev. July 2023), Section 4.3.2.7 (b) of the Greenbelt Plan requires that “<i>where there is extraction below the water table, no less than 35 per cent of the non-aquatic portion of the land subject to each license in the Natural Heritage System is to be rehabilitated to forest cover, which shall be representative of the natural ecosystem in that particular setting or ecodistrict.</i>” It is outlined in the PJR (rev. July 2023) that approximately 22 ha of the Site are located within the Greenbelt NHS. Of this, the Final Rehabilitated Landform and Ecological Enhancement Areas Plan shows woodlot on approximately 10 ha of that area. This equates to approximately 45% of the land subject to Natural Heritage System within the Site, which is to be rehabilitated to forest cover, which is representative of the natural ecosystem, achieving the above noted policy directive.</p> <p>Also, please refer to response #24 regarding more commentary on ‘landscape connectivity’.</p>				
17.	The quarry entrance alignment, berms and landscape treatment as configured would allow significant views into the extraction area. A detailed landscape and grading plan should be prepared for the quarry entrance, landscape design, road alignment and berm to reduce views into the extraction area as much as possible.	Item 5.3, pg. 17	Please refer to response #7 regarding the front entrance design.				
18.	The visual quality of the two major road intersections (Mississauga Road and Charleston Side Road; and Main Street and Charleston Side Road) should be updated to achieve a higher degree of visual quality.	Item .4c) 3 <sup>rd</sup> bullet point on pg. 14 Item 5.5, pg. 19	<p>The visual simulation for the intersection of Mississauga Rd. and Charleston Side Road has been updated to achieve a higher degree of visual quality and is provided in the VIA Addendum Report attached.</p> <p>The Charleston Sideroad and Main Street simulation has been reviewed to address two considerations; visual quality and the potential development of this intersection with future commercial interest that would be initiated as part of a future municipal planning process. The simulation reflects a proposal to create an acceptable visual landscape, and no rendering revisions are recommended. In addition, the recommendation to align the proposed intersection with potential future commercial and municipal upgrades would be subject to future planning studies and approvals related to the planned uses in this vicinity and further stakeholder collaboration at the time of detailed design. Future commercial uses in this vicinity are not currently permitted pursuant to the Town of Caledon Official Plan or Zoning By-Law and this is currently not applicable to the quarry visual assessment. CBM supports being engaged in any future intersection upgrades that may influence this intersection or CBM’s future operations.</p>				



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19.	The Landscape Plans do not illustrate a relationship to the Coulterville Study Area which is envisioned as a centre for tourism and recreation. The intersections (see above) may become support centres for retail, recreation, parking, etc. Buffers for the quarry should not extend into these areas to preclude future development opportunities. A vision for the land use and visual quality of these important focal points should be generated with the Town.	Item 5.4, pg. 18	It is acknowledged that the CBM Site is located within the Coulterville Special Study Area. It is noted in the Official Plan that “ <i>The Coulterville Special Study Area has been identified as the study area for an examination of appropriate after uses for the aggregate extraction areas and the development of detailed policies to ensure that such uses will be complementary to the natural environmental features and the cultural heritage features within the Study Area, as well as continuing aggregate extraction and the Caledon High Potential Mineral Aggregate Resource Areas within and in proximity to the Study Area.</i> ” (Sec. 4.1.7). This study, once initiated, is intended to examine the issue of appropriate after uses of lands currently being used for aggregate extraction, and to respect both continuing aggregate extraction as well as the identification of CHPMARA found within the study area. It is also noted in Section 5.2.6.4 in the Caledon Official Plan that, “ <i>in the interim, prior to completion and approval of the study, the appropriate designations and applicable policies for the designations apply to the Coulterville Special Study Area.</i> ” The study has not yet been initiated by the Town and, accordingly, the proposal is appropriate and is in conformity with Caledon’s Official Plan policies for the Coulterville Special Study Area. When a study is initiated, CBM will look forward to being involved.				
20.	More detail on landscape mitigation for the roadways is needed including plan views and cross-sections for each of the extraction phases. An attractive streetscape treatment should be indicated in the Landscape Plans along with landscape mitigation on quarry lands that is sufficiently setback to allow a r.o.w width for a 6-lane road with multi-use paths and transit corridor.	Item 5.6, pg. 20	Envisioning of an attractive streetscape treatment as part of the landscape design and visual quality mitigation, as well as the possibility of these roadways becoming a 6-lane road with multi-use paths and transit corridor are requirements that were not agreed to in the TOR. Also, based on the Caledon Official Plan requirements addressed in comment #12, and the response to comment #18, envisioning of streetscape designs are not applicable to the quarry VIA.  The extraction phases have been added to Figure 1 in the VIA Addendum.				
<b>Contrary to Visibility and Visual Quality Policies in the Town of Caledon Official Plan</b>							
21.	Section 5.11.2.4.2 (e) requires a Visual Impact Report that demonstrates the mineral resource extraction will not have unacceptable impacts. <i>The VIA Report and landscape plans create unacceptable visual impacts and are not compliant with this policy.</i>	Pg. 5-155	The PJR (rev. July 2023) and the Planning Justification Report Addendum (May 2025) (PJR Addendum) present an assessment of the proposal as it relates to relevant planning policies, including policies related to visual impacts and other matters addressed in technical reports (including Section 5.11.2.4.2 (e) from the Town of Caledon Official Plan). The PJR confirms that the design of the proposal ensures that any environmental, community or social impacts are minimized, and that the design will protect and enhance key features, will conserve cultural heritage resources, will utilize existing haul routes, will screen the active extraction area to maintain the open landscape character of the area, will minimize and mitigate impacts on surrounding agricultural lands and operations, and will enhance the natural environment through the ecological enhancement plan. As well, the PJR confirms that the design will ensure that potential impacts on surrounding lands from a				

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			noise, visual or blasting perspective are minimized and within all provincial standards.				
22.	Section 5.11.2.4.7 requires detailed site plans to be submitted. <i>The lack of a detailed plan for the quarry entrance, structures, and landscaping per extraction phasing is contrary to this policy.</i>	Pg. 5-157	<p>Section 5.11.2.4.7 reads as follows:            “When approvals are being considered for new or expanded mineral aggregate operations, the following information shall be made available to the public at the Municipal Office:            a) Detailed site plans as required for submission under the Aggregate Resources Act;            b) Any related reports prepared by the Applicants; and,            c) Any other reasonable information as determined through the preconsultation process described by Section 5.11.2.4.8.”</p> <p>Detailed Site Plans as required under the ARA have been submitted and made available to the Town of Caledon and are currently posted on the Town of Caledon (and CBM) web sites.</p> <p>Detailed design for a quarry entrance, structures and landscaping per extraction phasing is not identified as a Site Plan requirement under the ARA and was not identified by the Town in the TOR agreed to for the VIA.</p>				
23.	Section 5.11.2.4.11 requires 3 components to be addressed in the Visual Impact Assessment a) significant views and how they are affected, b) changes to the natural and cultural landscape, c) identification of mitigation measures and associated visual impact. <i>While the VIA does contain all of the above, there are inaccuracies and missing information that renders it non-compliant.</i>	Pg. 5-155	As noted in the PJR (July 2023) and the PJR Addendum (May 2025), the VIA has concluded that significant views and how they might be affected by the proposed Caledon Pit / Quarry have been considered, including the changes to the natural landscape and the cultural landscape. Mitigation measures such as berms, entrance designs, vegetation, landscaping and operational matters have been recommended to minimize visual impacts and with implementation of the recommendations, the proposed operation has been designed to not result in any unacceptable visual impacts on surrounding land uses. Site visibility will be predominantly limited to the establishment of berm and tree screening features that will be successful at eliminating the visibility of the aggregate extraction activity. As well, with the implementation of the proposed rehabilitation plan in the long term, the Site will result in a visual enhancement compared to existing conditions. Specifically, the resulting natural landscape will feature several lakes and a mosaic of woodlands, grasslands and wetlands that will complement and enhance the current agricultural aesthetic.				

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24.	Section 3.2.2.1.2 indicates an objective of ecosystem integrity is to protect, maintain, enhance and restore ecosystem attributes and values including: connectivity, visibility / self-sustainability, biological diversity, dynamics, and aesthetics (natural scenery). <i>The landscape plans do not comply with the definitions of connectivity in the OP, and the proposed long extents of grassy berms do not create high quality natural scenery.</i>	Pg. 3-11	<p>‘Connectivity’ is defined as follows in the Caledon Official Plan: <i>“Connectivity, shall mean the degree to which key natural heritage features are connected to one another by links such as plant and animal movement corridors, hydrological and nutrient cycling, genetic transfer, and energy flows through food webs.”</i></p> <p>The definition for connectivity and policy directives in Section 3.2 of the Caledon Official Plan related to connectivity refers more directly to natural heritage and wildlife and relate to the movement of native plants and animal across the landscape. This is addressed in the Natural Environment Report (WSP, July 2023) (NER). The reference to ‘connectivity’ is not directly intended to relate to visual impacts.</p> <p>Similarly, the Region of Peel Official Plan 2022, Section 2.11.25, <i>“directs the Town of Caledon to include, in its official plan, appropriate policies that support connectivity. These policies should include that applications for development or site alteration identify planning, design, and construction practices that ensure no buildings or other site alterations impede the movement of plants and animals along key natural heritage features, key hydrologic features, and adjacent land within Natural Core Areas and Natural Linkage Areas”</i>. Similar to the Town of Caledon Official Plan, the word connectivity in policy directives is not used in relation to visual impacts. Policy directives related to ‘connectivity’ more directly relate to natural heritage and wildlife, which is beyond the scope of the VIA.</p> <p>It should also be noted that assessment of connectivity is not part of the TOR for the VIA.</p> <p>Notwithstanding, connectivity is a component of the natural heritage assessment that feeds into the rehabilitation plan and general visual design. The visual design incorporates the principles of maintaining a landscape that expresses a natural, native viewshed that is prominent in rural Caledon. Through this lens the Project design incorporates a landscape connectivity that is visually compatible (connected) to surrounding rural landscape. With respect to connectivity of habitat to support wildlife movement and floristic propagation, the visual design elements are primarily associated with the periphery of the development area that are coincident with roadways and the viewshed from these arterial transportation corridors and, in this case, roadways with active volumes of traffic. As such, perimeter area visual design and plantings must remain cognizant of the objective to not create natural heritage connectivity in areas that may increase the potential for vehicle-wildlife encounters. This understanding has been considered in the development of the exterior façade of the pit/quarry that must blend (connect) with the existing landscape in an overall compatible manner that does not inadvertently create a corridor that may attract migrating/movement wildlife to roadways. Addressing ‘connectivity’ through visual design is not the intent of a visual assessment and may be inappropriate with respect to other wildlife considerations, and may not be desired from a natural heritage perspective in certain locations,</p>				

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			<p>as such connectivity is addressed in the natural heritage assessment. An understanding of ‘connectivity’ as discussed above is essential in the design of the perimeter areas of the pit/quarry and consideration of both natural heritage interests and visual viewsheds to enhance yet protect fauna.</p> <p>The natural heritage report addresses connectivity in development of a comprehensive rehabilitation plan that is designed to support the following goals:</p> <ul style="list-style-type: none"> <li>• Increase biodiversity of the Site post-extraction.</li> <li>• Improve and/or enhance habitat connectivity across the Site and to existing adjacent natural heritage systems. Create new habitat features to support the existing local wildlife community and/or attract additional wildlife and increase productivity.</li> <li>• Increase the amount of natural cover on the Site, including a net gain in area of woodland, wetland and grassland/meadow habitats.</li> </ul> <p>For details see Natural Environment Report Proposed Caledon Pit/Quarry Section 7.0 Rehabilitation/Mitigation/Monitoring (Golder (WSP) July 2023)</p>				
25.	<p>Section 7.13.3.2.1.3 requires non-agricultural uses to demonstrate that a) at least 30 percent will remain or be returned to natural self-sustaining vegetation, b) connectivity between Key Natural Heritage Features or Key Hydrologic Features is 240 m apart or less. <i>The landscape plans do not demonstrate the above required criteria.</i></p>	Pg. 7-217	<p>Section 7.13.3.2.1.3 in Caledon’s Official Plan is taken from Section 3.2.2.3 (b) and (e) of the Greenbelt Plan.</p> <p>Greenbelt Plan Section 3.2.2.3 (b) is discussed and assessed in the PJR (July 2023) and in the NER (July 2023) in terms of natural heritage features and ecology. This policy is demonstrated to be met through these reports.</p> <p>Section 3.2.2.3 (e) includes policy that states “...recognizing that section 4.3.2 establishes specific standards for the uses described there.” Section 4.3.2 relates specifically to non-renewable resources and specifically mineral aggregate resource uses. 4.3.2.3 states “Notwithstanding the policies of section 3.2, within the Natural Heritage system mineral aggregate operations and wayside pits and quarries are subject to the following...”. Section 4.3.2 is reviewed and discussed at length in the PJR (July 2023) and in the NER (July 2023).</p> <p>In short, Caledon Official Plan Policy 7.13.3.2.1.3 should not be read in isolation and should be read in the context of the Greenbelt Plan and specific policy directives related to mineral aggregate resources and natural heritage features. Detailed discussion contained in the PJR (July 2023) and NER (July 2023) demonstrates conformity with these policy sections. Also, please refer to response #24 regarding ‘landscape connectivity’.</p>				

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26.	Section 6.2.8 provides the definition of connectivity as “the degree to which key natural heritage features are connected to one another by links such as plant and animal movement corridors, hydrological and nutrient cycling, genetic transfer and energy flow through food webs”. <i>The Landscape Plans do not comply with this definition as there are instances of long grassy berms with no tree cover that are greater than 240 m apart.</i>	Pg. 6-33	<p>There are currently long stretches of roadway with no tree cover that are greater than 240 m apart, particularly along Charleston Sideroad.</p> <p>As noted above, the definition for connectivity in the Caledon Official Plan refers more directly to natural heritage and wildlife and relates to the movement of native plants and animal across the landscape. This is addressed in the NER (WSP, July 2023). The reference to ‘connectivity’ is not directly intended to relate to visual impacts.</p> <p>Also, please refer to response #24 regarding ‘landscape connectivity’.</p>				
<b>Contrary to Visibility and Visual Quality Policies in the Provincial Policy Statement 2024</b>							
27.	Section 2.5.1 f) requires that rural areas should be supported by sustainable and diversified tourism, including leveraging historical, cultural and natural assets. <i>The Landscape plans in some places exhibit a bare minimum approach (ie. the long, grassy berms) which is contrary to this policy. Natural assets would be leveraged by applying the Town of Caledon’s policies for connectivity and restoring 35% tree cover.</i>	Pg. 11	<p>The CBM Site is located in a rural area of Caledon. The proposed CBM Caledon Pit / Quarry is a permitted and supported use in the rural area and considers the Site’s locational attributes, proximity to market, the presence and significance of the aggregate resource, and the long-term land use vision pursuant to the rehabilitation plans (including ecological enhancements). These attributes and vision align with the PPS rural area policies and make the proposed CBM Caledon Pit/Quarry an appropriate land use consideration for the Subject Site.</p> <p>This comment concerning connectivity is similar/duplicative of the peer review comments mentioning connectivity in comments #16, 24, 25, 26, 27, 28, 31, 33, 34, 39 and 40. It is misinterpreted to be directly linked to visual impacts which are predominantly in support of anthropogenic considerations than natural heritage considerations and are more appropriately addressed under natural heritage impact assessment and applicable mitigation measures (including rehabilitation) where it is been appropriately addressed.</p> <p>Also, please refer to response #24 regarding ‘landscape connectivity’ and response #16 regarding Greenbelt Plan.</p>				
28.	Section 4.1.1 requires the diversity and connectivity of natural features to be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features. <i>The Landscape Plans do not illustrate connectivity that complies with the Greenbelt Plan or the Town of Caledon Official Plan.</i>	Pg. 21	<p>This is Section 4.1.2 of the Provincial Planning Statement (2024). This policy directive is assessed in the PJR Addendum (May 2025) which was submitted to the Region and Peel and Town of Caledon in May 2025. References are made to the NER (July 2023) where it is demonstrated that this policy directive is achieved from a natural features perspective for the proposed mineral aggregate resource operation proposal.</p> <p>Also, please refer to response #24 regarding ‘landscape connectivity’.</p>				

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29.	Section 4.5.3 requires that progressive and final rehabilitation of mineral extraction areas promote land use compatibility, recognize the interim nature of extraction, and mitigate negative impacts to the extent possible. <i>The landscape plans do not recognize that both Main Street and Charleston Side Road are designated as arterial roads in the Caledon Official Plan. The Landscape Plans and extraction area boundary should demonstrate the likely scenario of both roads becoming 6-lanes with transit and multi-use paths and the location of berms and landscape design should reflect the interim nature of extraction.</i>	Pg. 27	<p>Section 4.5.3 of the PPS (2024) is assessed in the PJR Addendum (May 2025) and it is demonstrated that this policy directive is met. The proposed CBM Caledon Pit / Quarry is planned to be progressively rehabilitated. The progressive and final rehabilitation of an aggregate operation involves the management of the property's natural environment during and after the extraction process. The post-extraction rehabilitation plan has been designed to fit into the overall regional context and complement the existing topography and terrestrial and aquatic features in the area. The overall final rehabilitation plan will consist of three separate lakes in each of the North, Main and South extraction areas surrounded by nearshore, riparian, and upland habitats. Proposed rehabilitation of the extraction area will proceed progressively through each phase. Additional details on the Rehabilitation Plan are found in the PJR (July 2023) and in the 'Rehabilitation Plan' (page 4 of 4 in the updated Site Plan drawing set, MHBC, May 2025).</p> <p>It is unclear where the 'likely scenario of both roads becoming 6-lanes with transit and multi-use paths' originates from. Review of the Town's approved Rehabilitation Master Plan (RMP, March 2021) confirms that approximately 5.75% of the Site (in the northwest portion of the Site, adjacent to Mississauga Road) is subject to this Plan, and the RMP envisions this area as natural heritage and agricultural.</p>				
<b>Contrary to Visibility and Visual Quality Policies in the Greenbelt Plan</b>							
30.	Section 1.2.1 Vision describes the Greenbelt as permanently protected land which builds resilience to and mitigates climate change. <i>Increasing the number of trees results in additional oxygen and humidity which helps to mitigate climate change, and the long grassy berms shown in the Landscape Plans do not perpetuate this vision.</i>	Pg. 4	<p>Through rehabilitation, the Site will result in a visual enhancement compared to existing conditions. Specifically, the resulting natural landscape will feature several lakes and a mosaic of woodlands, grasslands and wetlands that will complement and enhance the current agricultural aesthetic.</p> <p>As noted in the PJR and NER (both July 2023), the proposed CBM Caledon Pit / Quarry results in the removal of 18.9 ha of nonsignificant woodland areas and 66.5 ha of woodland area will be created through off Site ecological enhancement and the rehabilitation plan. Of this, 46.2 ha of woodland areas will be created within the licence area as part of visual screening and rehabilitation plan. 5.0 ha of this will be planted within the first year of the licence being issued. Outside of the licence area, a 15.5 ha woodland will be created within five years of the licence being issued. Taking into consideration the proposed off-Site ecological enhancement plan and the rehabilitation plan, woodland areas will be increased by a 3.5 to 1 ratio (66.5 ha to be created and 18.9 ha to be removed).</p>				



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31.	Section 3.2.2.3 b) requires connectivity along the system and between key natural heritage features and that key hydrologic features located within 240 m of each other will be maintained or where possible, enhanced for the movement of native plants and animals across the landscape. <i>The landscape plans do not demonstrate connectivity within 240 m of retained forest patches and the surrounding landscape.</i>	Pg. 22	<p>See above. Greenbelt Plan Section 3.2.2.3 (b) is discussed and assessed in the PJR (July 2023) and in the NER (July 2023) in terms of natural heritage features and ecology. This policy is demonstrated to be met through these reports.</p> <p>Also, please refer to response #24 regarding 'landscape connectivity'.</p>				
32.	Section 3.2.2.3 e) requires at least 30% of total developable area to remain or be returned to natural self-sustaining vegetation. <i>The Landscape Plans do not indicate that 30% of land beyond the boundary of the extraction area will be natural self-sustaining vegetation.</i>	Pg. 22	<p>See above. Section 3.2.2.3 (e) includes policy that states "...recognizing that section 4.3.2 establishes specific standards for the uses described there." Section 4.3.2 relates specifically to non-renewable resources and specifically mineral aggregate resource uses. 4.3.2.3 states "Notwithstanding the policies of section 3.2, within the Natural Heritage system mineral aggregate operations and wayside pits and quarries are subject to the following....". Section 4.3.2 is reviewed and discussed at length in the PJR (July 2023) and in the NER (July 2023).</p> <p>Section 3.2.2.3 (e) should not be read in isolation and should be read in the context of the Greenbelt Plan and specific policy directives related to mineral aggregate resources and natural heritage features. Detailed discussion contained in the PJR (July 2023) and NER (July 2023) demonstrates conformity with these policy sections.</p>				
33.	Section 4.1.1.2 d) requires that non-agricultural uses in the Protected Countryside designation have no negative impacts on the biodiversity or connectivity of the natural heritage system. <i>The landscape plans do not demonstrate connectivity that complies with Section 3.2.2.3 b).</i>	Pg. 37	<p>Assessment of the proposal resulting in no negative impacts on the biodiversity or connectivity of the natural heritage system is addressed in the NER (July 2023). As well, as noted above, Section 3.2.2.3 (b) is addressed in both the PJR and Natural Environment Reports (both July 2023).</p> <p>Also, please refer to response #24 regarding 'landscape connectivity'.</p>				
34.	Section 4.3.2.3 b) i. Any application for a new mineral aggregate operation shall be required to demonstrate how connectivity between key natural heritage features and key hydrologic features shall be maintained before, during and after extraction. <i>The landscape plans do not illustrate a design for each extraction phase that demonstrates connectivity.</i>	Pg. 44	<p>Section 4.3.2.3 (b) (i) is addressed in the PJR (July 2023). It is noted that the NER (July 2023) confirms that no negative impacts to the significant natural heritage features and functions in the study area are expected and that the ecologically based rehabilitation plan and preventative measures proposed will enhance the natural heritage system and provide connectivity between features. Recommendations contained in the NER include implementing a 30 m setback from Tributary #1, the Coulterville Wetland Complex, and wetland Units #3, 4 and 5, including a 10 m vegetation protection zone to each feature. As well, protection of off-Site significant woodlands will be assured through a minimum setback of 15 m from the limit of extraction to all significant woodlands, including a 10 m VPZ.</p> <p>Also, please refer to response #24 regarding 'landscape connectivity'.</p>				

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35.	Section 4.3.2.3 b ii. Any application for a new mineral aggregate operation shall be required to demonstrate how the operator replaces key natural and hydrologic features that are lost due to extraction with equivalent features on another part of the site or on adjacent lands. <i>The landscape plans do not contain this information.</i>	Pg. 44	Section 4.3.2.3 (b) (ii) is an ecological policy directive which is addressed in the PJR (July 2023) and the NER (July 2023). In terms of replacement of key natural heritage features and key hydrologic features lost through extraction, the application results in the removal of 22.2 ha of key natural heritage features and key hydrologic (i.e. non-significant wetland and habitat of endangered and threatened species) that are permitted to be removed in accordance with applicable policies. Taking into account the proposed rehabilitation plan and the off-Site ecological enhancement plan, the application results in the creation of 91.2 ha of new key natural heritage features (i.e. meadow, wetland, woodland) and 157.9 ha of new key hydrologic features (i.e. lake and wetland) and the lake is also considered fish habitat, which is a key natural heritage feature.				
36.	Section 4.3.2.5 a) New mineral aggregate operations within the Protected Countryside designation shall ensure that the rehabilitated area will be maximized and disturbed area minimized on an ongoing basis during the life cycle of an operation. <i>The landscape plans do not have a design for each extraction phase.</i>	Pg. 45	Section 4.3.2.5 (a) is addressed in the PJR (July 2023). In accordance with the Greenbelt Plan, the extracted area will be progressively rehabilitated, as outlined on the Site Plans. The post-extraction rehabilitation plan has been designed to fit into the overall regional context and complement the existing topography and terrestrial and aquatic features in the area. Because the extraction is below-water, it is not feasible to rehabilitate the lands back to agricultural conditions. Rather, the overall final rehabilitation plan will consist of three separate lakes in each of the North, Main and South extraction areas surrounded by nearshore, riparian, and upland habitats. Proposed rehabilitation of the extraction area will proceed progressively through each phase. As well, the ARA Site Plans include a maximum disturbed area for the site and explain how the area is calculated. Throughout the life of the operation CBM must not exceed this maximum allowable disturbed area.				
37.	Section 4.3.2.6 a) requires the rehabilitation of new mineral aggregate operations sites to have the disturbed area of a site be rehabilitated to a state of equal or greater ecological value and, for the entire site, long-term ecological integrity shall be maintained or enhanced. <i>The landscape plans with long grassy berms do not demonstrate equal or greater ecological value.</i>	Pg. 45	Section 4.3.2.6 (a) is addressed in the PJR (July 2023). Habitat variety, including wetland, woodland, meadow and native upland habitats will be incorporated into the rehabilitation plans for the Site. The overall goal of the final rehabilitation plan is to create a landform that represents an ecological and visual enhancement and provides future opportunities for conservation, recreation, tourism and water management. Table 1 in the PJR (July 2023) summarizes the habitat / areas to be removed through proposed extraction, and the compensation areas (by feature type) proposed through rehabilitation and off-Site. It is confirmed that, through rehabilitation, all areas to be removed will be more than compensated for through rehabilitation.				



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38.	Section 4.3.2.7 b) requires that where there is extraction below the water table, no less than 35% of the non-aquatic portion of the land subject to each license in the Natural Heritage System is to be rehabilitated to forest cover ... <i>The landscape plans do not demonstrate that this policy has been applied.</i>	Pg. 46	See above, and this is addressed in the PJR (July 2023). Approximately 22 ha of the Site are located within the Greenbelt NHS. Of this, the Final Rehabilitated Landform and Ecological Enhancement Areas Plan shows woodlot on approximately 10 ha of that area. This equates to approximately 45% of the land subject to Natural Heritage System within the Site which is to be rehabilitated to forest cover, which is representative of the natural ecosystem, achieving this policy directive.				
39.	Section 4.3.2.7 c) requires that rehabilitation shall be implemented so that the connectivity of the key natural features on the site and on adjacent lands shall be maintained or enhanced. <i>The landscape plans do not demonstrate compliance with connectivity policies.</i>	Pg. 46	It is suggested that this is a policy directive more appropriately addressed through the rehabilitation plans and the commentary addressing rehabilitation policy directives from a natural heritage features and ecological perspective, not the landscape plan in isolation. This is addressed in the PJR (July 2023) and in the NER (July 2023). Also, please refer to response #24 regarding 'landscape connectivity'.				
40.	Section 7 Definitions – connectivity means the degree to which key natural heritage features or key hydrologic features are connected to one another by links such as plant and animal movement corridors, hydrologic and nutrient cycling, genetic transfer and energy flow through food webs. <i>The landscape plans do not demonstrate an acceptable level of connectivity for visual quality and ecological functioning that complies with the Green Belt Plan, the Town of Caledon Official Plan, and PPS 2024.</i>	Pg. 63	This is addressed above and is the same definition for connectivity contained in the Caledon Official Plan. The definition for connectivity refers more directly to natural heritage and wildlife and relates to the movement of native plants and animal across the landscape. This is addressed in the NER (July 2023). The reference to 'connectivity' is not directly intended to relate to visual impacts. Also, please refer to response #24 regarding 'landscape connectivity'.				