



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

Comment No.	Initial CAART Comments (Date)	Page / Section	Applicant Response (Date)	CAART Response (Date)	Applicant Response (Date)	CAART Response (Date)	Applicant Response
Report: Comments on the Visual Impact Assessment prepared by Golder + Landscape Plans by MHBC							
Author: J. Fedorowick, Wavefront Planning and Design Incorporated							
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					
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					
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					

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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					
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 th bullet point on pg. 12					
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, 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.	Table 2, Item D.1, pg. 4; Item A.3 on pg. 5; 5 th bullet point on pg. 12					
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					
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 rd and 4 th bullet point on page 12					
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					

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10.	Each cross-section should display the extent of the view only. The vertical and horizontal scales should be equal.	Item 3, pg. 6					
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 tunnels, noise barriers, temporary and permanent buildings.	Item B.1, pg. 5					
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					
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					
14.	There is insufficient public consultation and stakeholder engagement to assess community concerns about visual impacts.	Pg. 3					
Proposed Landscape Treatment to Screen Views and Improve Visual Character and Quality							
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 th bullet point on pg. 12					
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					

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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					
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 rd bullet point on pg. 14 Item 5.5, pg. 19					
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					
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					
Contrary to Visibility and Visual Quality Policies in the Town of Caledon Official Plan							
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					

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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					
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					
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					
25.	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>	Pg. 7-217					
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</i>	Pg. 6-33					

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	<i>grassy berms with no tree cover that are greater than 240 m apart.</i>						
Contrary to Visibility and Visual Quality Policies in the Provincial Policy Statement 2024							
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					
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					

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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					
Contrary to Visibility and Visual Quality Policies in the Greenbelt Plan							
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					
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					

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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					
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					
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					
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					
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					

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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					
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					
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					
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					