

	STAFF COMMENTS	ACTION BY	RESPONSE
REGION OF PEEL – JULY 6, 2020			
Draft ROPA Document			
1.	The Draft ROPA needs to be revised to be clear on what is being proposed to be amended in the Official Plan. The Planning Justification Report (PJR) considers required additional population, however, the draft amendment makes no mention of the time horizon (i.e. 2041) that it would be implemented through in the policies. The draft amendment only addressed mapping changes that are required, and this must be expanded upon in both the PJR and Draft ROPA. Please include all maps to be updated in the ROP.	HPGI	No action required. The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058.
Planning Justification Report			
<i>General Comments:</i>			
1.	The PJR needs to be revised to more clearly articulate what is being amended in the ROP through the ROPA amendment document. The PJR considers required additional population, however, the draft amendment makes no mention of how it would be implemented through the policies. The draft amendment only addressed mapping changes that are required, and this must be expanded upon in both the PJR and Draft ROPA.	HPGI	No action required. The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058
2.	Throughout the Planning Justification Report, reference is made to conformity to the Growth Plan as a result of the Municipal Comprehensive Review (MCR) undertaken by the Town of Caledon for the Bolton Residential Expansion Study (BRES).	HPGI	No action required. The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058
3.	Since the BRES study was completed in 2014, the in-effect Growth Plan at that time would have been the 2006 Growth Plan. The PJR and studies need to demonstrate conformity with the 2019 Growth Plan. Regional staff have concerns with the conclusion that the BRES studies meet the requirements for an MCR as the policies have changed since that study was completed.	HPGI	Addressed. This is relevant for approval purposes of the LOPA, subdivision and zoning applications. The PJR includes an analysis of the 2019 Growth Plan in order to demonstrate conformity with its applicable policies. See pg. 19 of the Planning Justification Report.
4.	The BRES study was specific to identification of expansion areas appropriate for Bolton, whereas the requirements in the 2019 Growth Plan and the policies applicable for a less than 40 ha settlement boundary expansion amendment require that this application be considered and justified as an appropriate location when considering all of the whitebelt of Caledon. The studies and planning justification report need to be expanded to address this larger scale of analysis.	HPGI	<p>The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and this matter is considered require no further action.</p> <p>In October 2017, the Region of Peel released a document entitled “Peel Region 2041 Growth Allocation Management Regional Official Plan Amendment” (“Draft 2017 ROPA”) which established population and employment forecasts for the Town in 2031 and 2041.</p> <p>In this regard, it was forecasted that the Town’s population would be 116,000 in 2031 with 51,000 jobs. By 2041, the Town of Caledon is forecasted to reach a population of 160,000 with 80,000 jobs.</p> <p>In the documentation prepared in support of the Draft 2017 ROPA, it was also determined that additional settlement area expansion(s) would be required to accommodate growth in Peel to 2041 in the order of 550 hectares for new community areas and 730 hectares for employment areas. As a consequence, there is no question that additional Greenfields lands are required to ensure conformity with the population and employment forecasts in the 2019 Growth Plan. This means that the need for settlement area expansion has been justified.</p> <p>The determination of where the settlement area expansion should be located in Caledon (which is the only location in the region of Peel where new Greenfield areas can be located) is supported throughout the PJR and in the application support materials. An indicator of the appropriateness of this location as an area for settlement expansion has been expressed and demonstrated through a number of supporting background technical studies. The technical studies, completed as part of this exercise (and previously by the BRES) and submitted with the application confirm the appropriateness of the site to accommodate residential expansion, not only from a traffic and</p>

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			servicing perspective, but also with respect to the consideration of land needs, agricultural and environmental impacts.
5.	Please provide an analysis in the Planning Justification Report to demonstrate how each policy in Section 2.2.8 of the 2019 Growth Plan has been met, and if a policy is not applicable, why it is not applicable.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. This matter is relevant as related to the LOPA and subdivision and has been addressed as the applicable policies of Section 2.2.8 of the 2019 Growth Plan have been reviewed and evaluated in the Planning Justification Report. See pg. 20-21 of the PJR. It was found that only subsection 2.2.8.5 was applicable in the context of the proposed expansion. As such, the other sections (i.e. 2.2.8.1, 2.2.8.2, 2.2.8.3, 2.2.8.4, 2.2.8.6) were not evaluated and included in the Report. It is important to note that subject settlement area boundary expansion is proposed to occur via site-specific applications (LOPA) in advance of an MCR. The proposal represents a “minor rounding out” adjustments to the rural settlement area. As such, the additional policies of Section 2.2.8.2 are not applicable to the proposal.
6.	The PJR must be revised to address, at a minimum, how all the applicable criteria in Section 2.2.8 - Settlement Area Boundary Expansions (not just 2.2.8.5) of the Growth Plan, and Section 7.10.2.12 (municipal comprehensive review criteria) of the Regional Official Plan have been met for this site, considering both Regional and local criteria. An in-depth review of all of the policies should be provided.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. . The PJR provides an in-depth review of Section 7.10.2.12 (municipal comprehensive review criteria. See pg. 43 – 47 of the Planning Justification Report.
7.	Throughout the Planning Justification Report, reference to Section 2.2.9 of the 2019 Growth Plan should be removed as the application is for a settlement boundary expansion and is not proposing development in a rural area.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The matter is still relevant as related to the LOPA application and has been addressed. Section 2.2.9.7 of the Growth Plan 2019 speaks to minor adjustments to the boundaries of <i>rural settlements</i> outside of a <i>municipal comprehensive review</i> . As such, the proposal has included an analysis of the evaluation of these policies in order to demonstrate conformity with the Plan.
8.	Section 4.3 should be removed/updated as the 2017 Growth Plan is no longer in effect.	HPGI	Addressed. Section 4.3 of the PJR has been include for background purposes only. Section 4.3.1 should be referenced for purposes of policy direction and conformity.
9.	Conformity to Section 2.2.8.5 of the Growth Plan states that the development provides a density target of approximately 20-40 UPH, which translates to approximately 65-130 people per hectare. Please elaborate further on why there is such a range of density provided, and provide a recommended density for this site. Further comments may be provided when additional information is received.	HPGI	Addressed. The density range of 20-40 UPH was derived from the Region of Peel Official Plan minimum density targets for Greenfield sites. The purpose of this information is to demonstrate conformity within the prescribed threshold. Page 46 of the PJR further elaborates on the site-specific density for the project (i.e. 25.36 UPH). This translates to approximately 83.18 person/jobs per hectare which conforms to the Growth Plan requirement of 50 people/jobs per hectares as well as the Region of Peels requirement of 42 residents/job combined per hectare for the Town of Caledon (Section 5.5.4.2.2)
10.	Page 47 – This section discusses a “minimum Greenfield target of 80 people and jobs per hectare.” This was a 2017 Provincial growth standard which has now been updated with the 2019 Growth Plan. This report should revise this statement and included and recommended density for this development.	HPGI	Noted. The PJR incorrectly references outdated density targets for Greenfield Areas (i.e. 80 people/jobs per hectare whereas the new 2019 Growth Plan target is 50).
11.	Page 5 and Page 36 – The report concludes that the Region’s growth management work “will require further expansion of the Bolton Residential Area.” This ‘will’ statement should be revised as the Region is undertaking the Settlement Boundary Expansion Study to determine where the growth will be accommodated.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Noted. The PJR states that Bolton <i>will</i> be required to accommodate the Region’s future planned growth.
12.	The report will need to determine if the policies included in the ROP on the Bolton Rural Service Centre are all applicable to this area and if additional Regional policies are required specific to this area stemming from the results of the technical studies.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The LOPA which accompanies this submission outlines the required amendments to facilitate the development proposal. See enclosed LOPA.

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13.	The study should consider and provide an opinion on whether any retail, other non-residential use, or mixed-use is appropriate for this site through the 2041 expansion being requested to meet 2041 needs.	HPGI	<p>Addressed. Section 7.0 (Community Services and Facilities Study and Community Infrastructure Needs) Evaluation provides an analysis and evaluation of existing surrounding commercial and retail uses in proximity to the proposed development. In terms of commercial land needs, it is demonstrated through the PJR that there is an adequate supply of commercial and retail land uses that would be required to serve the future population generated by the development.</p> <p>Further, the Commercial/Retail market Demand Analysis (2014) prepared by Kircher & Associates as part of the BRES, recommends that a substantial portion of the population (2031) will have to be in place before additional commercial and retail development its feasible. As such, the space warranted to accommodate the development already existing within the commercial corridor in Bolton. Further, there is additional vacant land within Bolton, that is already commercially zoned, which is expected to accommodate major commercial/retail growth.</p> <p>As such, the proposed development will not have a measurable impact on commercial/retail access and non-residential uses are not appropriate for the site in consideration of residential land needs.</p>
14.	In some parts of the report, the lands are referred to as Rounding Out Area B, however, in other, they are referred to as Rounding Out Area 3.	HPGI	Addressed. The Chickadee Lands are identified as ‘Rounding Out Area B’ and ‘Rounding Out Area 3’ in the various background reports and technical studies prepared as part of the BRES as well as the ROPA for the Bolton Residential Expansion Study. For example, the PJR prepared by Meridian Planning dated October 2014 identifies the Chickadee Lands as ‘Rounding Out Area 3’ whereas the Peel Region Recommendations Report prepared by the Planning Partnership dated June 16, 2016 references the Chickadee Lands as ‘Rounding Out Area B’. It appears that the terminology is interchangeable and the HPGI PJR correctly identifies the Chickadee Lands in their certain contexts.
<i>Affordable Housing:</i>			
1.	The Region of Peel supports the development of a range of housing to accommodate future growth, and recommends the applicant consider a more diverse mix of unit types that includes single, semi-detached, second units etc, (beyond only townhouse types). This is key to the development of complete communities.	Brookvalley / HPGI	Addressed. The proposed development assists in the creation of a complete community by providing a more diverse mix of unit types that what currently existing in the community today. Medium density uses in this strategic location would contribute to the achievement of more housing mix balance as it appears that the current housing mix within Bolton, which consist predominantly of single detached and semi-detach dwelling units, fails to achieve the desired unit distribution outlined in the Official Plan.
2.	The Planning Justification Report references the need for increased affordable housing options in Peel, including in the Town of Caledon. The current Regional Official Plan highlights the need for a mix and diversity of housing types. Further, the Peel Housing and Homelessness Plan (PHHP), which was endorsed by Regional Council in 2018, the needs assessment states that approximately 13.3% of all new housing in the Region should be affordable to middle income families (a sale price of approximately \$423,000 in 2019). With 140 units proposed to be added in this development, the applicant should demonstrate how it will be contributing to the middle-income target at this price point, which is notably more affordable than the current average price of a townhome in Caledon.	Brookvalley / HPGI	<p>Addressed. The proposed development brings the proposed housing closer to the affordability threshold by providing a product that is more affordable than the current average price of other existing ground-related typologies in Caledon.</p> <p>The applicant remains committed to the provision of affordable housing options, including partnerships with all levels of government, through financial tools and incentives that encourage the development of affordable housing, including development charges grants and cash-in-lieu provisions which recognize affordable housing as a community benefit.</p>
3.	The PHHP also establishes a tenure target that states that 25% of all new housing in the Region should be rental. The applicant should consider how this development will contribute to rental housing need in Caledon, including further review of how second units can be incorporated at the development stage. This may be supported by a review of unit mix and considering a wider range of home designs that include second units.	Brookvalley / HPGI	Addressed. The applicant is exploring options of establishing a ratio of approximately 15% rental through the construction of basement secondary suites. However, due to site limitations and spatial constraints it would be difficult to provide the required parking spaces on a properly surfaced driveway or garage or carport. This issue can be offset based on the site proximity to a future MTSA with the proposed GO Transit Hub proposed to be located north of King Street and east of Humber Station Road – approximately 1.2 km from the subject site. Other options to accommodate secondary suites in larger townhouse end-units is also being evaluated.

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4.	The Planning Justification Report should be updated to reference how the development will contribute to these Regionally endorsed targets.	Brookvalley / HPGI	Addressed. The applicant is interested in a potential partnership with the Region in order to help to meet the identified affordable housing targets. As discussed above, a financial incentive program would improve the feasibility of providing an affordable housing project. These incentives and tools may include: <ul style="list-style-type: none"> • Land donation (Regionally owned parcel located between Chickadee Ln & Emil Kolb Pkwy) • Grant in lieu of Region of Peel development charges • Grant in lieu of local municipal development charges • Grant in lieu of parkland dedication fees • Grant in lieu of municipal planning and building permit fees • Alternative parking standards
<i>Greenbelt Plan:</i>			
1.	The PJR notes that “the easternmost portion of these lands which are identified as located within the Greenbelt Plan Area have not been considered as part of the BRES,” and also notes that the north-west quadrant of the subject lands are identified as located within the Greenbelt Plan Area “have not been considered as part of the BRES” (page 7 and 8).As such, the PJR submitted for this application provides the review of the Greenbelt Plan for these areas.	HPGI	No Action Required.
2.	The application is proposing a stormwater management approach consisting of a 0.60 ha stormwater management pond block to the north of the development that captures drainage the proposed development area. The proposed stormwater management pond is located inside of the greenbelt plan area. The lands in which the pond is proposed is designated in the Region’s Official Plan as Protected Countryside (Natural Heritage System) of the Greenbelt Plan (Schedule D3). A park, open space, restoration area also proposed in is area.	HPGI/Palmer	No Action Required. Refer to TRCA Recommendations Comment #1 and Development Planning and Permitting Comment #15.
3.	Figure 13 of the CEISMP shows the woodland as a key natural heritage feature, and Section 10.3 defines these areas as significant woodlands. Section 3.2.2.3 of the Greenbelt Plan states that new development must demonstrate that there will be no negative impacts on key natural heritage features or their functions. Further, Section 4.2.3.3 states that “stormwater management systems are prohibited in key natural heritage features ... and their associated vegetation protection zones”. Figure 13 of the CEISMP shows a minimum VPZ, as per Section 4.2.5.4 of the Greenbelt Plan. Please note that this is a minimum, and per Section 4.2.5.5, a natural heritage evaluation is required to determine the extent. As the pond is proposed to be located within the VPZ, the PJR must be updated to speak to Section 4.2.3.3.	HPGI / Palmer	Addressed. CEISMP provides conformity review with the policies of the Greenbelt Plan. Analysis of Section 4.2.3.3 is found on page 80 of the CEISMP prepared by Palmer Environmental Consulting Group. Refer to TRCA Recommendations Comments #1 and #2. The SWM Pond location has been revised to be located outside of the VPZ (also referred to as the MVPZ).
4.	Section 3.2.2.5 and 3.2.2.6 of the Greenbelt Plan state that “The Natural Heritage System, including the policies of section 3.2.5, does not apply within the existing boundaries of settlement areas, but does apply when considering expansions to settlement areas as permitted by the policies of this Plan,” and that “Towns/Villages are not permitted to expand into the Natural Heritage System.” The PJR must be updated to speak to these sections of the plan.	HPGI / Palmer	Addressed. CEISMP provides conformity review with the policies of the Greenbelt Plan. Analysis of Section 3.2.5 is found on page 75 of the CEISMP prepared by Palmer Environmental Consulting Group.
5.	Further to the above, Section 3.4.2.1 states that “Settlement areas outside the Greenbelt are not permitted to expand into the Greenbelt.” Section 3.4.3.3 states that “As part of a municipal comprehensive review under the Growth Plan, an upper- or single-tier planning authority may allow expansions of settlement area boundaries in accordance with the policies 2.2.8.2 and 2.2.8.3 of the Growth Plan.” The PJR must be updated to speak to these sections of the plan. Further, Section 2.2.8.3 of the Growth Plan subsection f) states that “the proposed expansion would meet any applicable requirements of the Greenbelt” and subsection k) vi) states that “within the Protected Countryside in the Greenbelt Area, expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.” The analysis in the PJR should be expanded to include a review of Growth Plan policies 2.2.8.2 and 2.2.8.3.	HPGI / Palmer	Not Applicable. Section 2.2.8.2 and 2.2.8.3 does not apply to the subject boundary expansion/development proposal as it will not be implemented through an MCR process. As such, the evaluation criteria of Growth Plan has not been analyzed in the context of the application.

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6.	The description of the north-west quadrant of the development includes reference to providing a public park in the Greenbelt Plan. This portion of the Greenbelt Plan Area is also located within the Natural Heritage System overlay. If parkland dedications are being proposed in conjunction with the park/open space block creation, please note that Policy 2.2.10.4.17 of the Region of Peel Official Plan does not permit parkland dedication within the Natural Heritage System of the Greenbelt Plan as a condition of approval for development within an urban settlement area. A similar policy (Policy 7.13.3.2.1.5 (p. 7-213)) is included in the Town of Caledon Official Plan. Further discussion with the Town and applicant is recommended to clarify parkland dedication requirements for the Chickadee Lane expansion if any other sections of the greenbelt plan are being relied upon, these should be referenced in the PFR.	HPGI / Palmer	Noted. ROPA to be updated to include exemption to Policy 2.2.10.4.7 of the Region of Peel OP in order to permit parkland dedication within the Natural Heritage. Refer to Development Planning and Permitting Comment #15.
<i>Agriculture in PJR:</i>			
1.	The planning justification provided in the PJR does not fully demonstrate how agricultural impact assessment requirements for the settlement area boundary expansion has been satisfied. It would be appropriate to have separate sections on the Policy Framework and then summaries of the revised AIA and CESIMP, given previous comments in the applicable sections below.	HPGI / Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. A standalone AIA and CESIMP has been submitted in support of the proposal. Key policies and summaries are contained within those documents including how policy conformity to the Growth Plan and Greenbelt Plan is being addressed and demonstrated. Summaries of the background technical studies have been provided as a courtesy and to provide additional context. No further updates to these Sections are required.
2.	The PJR does not address lot creation in the prime agricultural area designation in the Greenbelt Plan and whether the proposed lot boundaries to recognize the existing dwellings, stormwater management blocks, open space blocks and parkland blocks would be permitted in accordance with the 2020 PPS and 2017 Greenbelt Plan. The PRJ does not fully demonstrate that the proposed expansion can be accommodated in accordance with the applicable policies.	HPGI / Stantec	Noted. See response above.
3.	This section of the PJR should also consider the comments provided below and the AIA.	HPGI / Stantec	Noted. See response above.
<i>CEISMP in PJR:</i>			
1.	The CEISMP section of the PJR need further details. This section needs to be reviewed and updated to demonstrate that policy requirements of the Provincial Policy Statement, 2019 Growth Plan, 2017 Greenbelt Plan and Regional Official Plan have been fully addressed. It is important that the PJR provide opinions if a conceptual natural heritage system and conceptual stormwater management plan have been identified to the satisfaction of the Region and technical review agencies and are in accordance with policy requirements.	HPGI / Palmer	Noted. See response above.
2.	This section of the PJR should be enhanced to address how the proposed uses and lot creation for parkland dedication, public park uses, and active recreation uses in the Greenbelt Plan Protected Countryside and Natural Heritage System conform with the Greenbelt Plan. If the proposed expansion is dependent on these uses and facilities being permitted, it is recommended that the PJR address how policy conformity is being addressed and demonstrated.	HPGI / Palmer	Noted. See response above.
3.	When all the components of the CEISMP are received, and the Region and the TRCA is satisfied that the requirements provided in this letter, and the Region's February 24, 2020 letter have been sufficiently addressed, the PJR should be updated accordingly. Regional staff are unable to provide further comments on the CEISMP component of the PJR until all requested materials have been received.	HPGI / Palmer	Noted. See response above.
4.	Once a CEISMP is complete, the PJR should include an analysis of the CEISMP in an appropriate section or sections and/or throughout the PJR as needed to provide justification based on the final CEISMP Parts A, B and C documentation for Chickadee Lane. The report must be revised to provide the justification in a clear, organized fashion indicating the corresponding provincial and regional planning documents and each relevant policy number/requirement throughout the document.	HPGI / Palmer	Noted. See response above.
5.	The associated PJR documentation, that demonstrates environmental study requirements have been satisfied, should be reviewed and updated to reflect the final Part A, B and C components acceptable by the Region and technical review agencies.	HPGI / Palmer	Noted. See response above.
Agricultural Impact Assessment			

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<i>General Comments:</i>			
1.	It is Regional staff's opinion that the June 2019 AIA report completed by Stantec Consulting will require further revisions in order to more clearly document how policies in Section 2.2.8 (specifically 2.2.8.3 f), g), h), i) and j)) and Section 4.2.6 of the 2019 Growth Plan and Policies 7.10.2.12 g), h), i), j), k) and q) in the Region of Peel Official Plan have been satisfied.	Stantec	<p>The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Section 2.2.8 of the 2019 Growth Plan have been reviewed and evaluated in the Planning Justification Report. See pg. 20-21 of the PJR. It is noted that only subsection 2.2.8.5 is applicable in the context of the proposed expansion. As such, the other sections (i.e. 2.2.8.1, 2.2.8.2, 2.2.8.3, 2.2.8.4, 2.2.8.6) were not evaluated and included in the Report.</p> <p>It is important to note that subject settlement area boundary expansion is proposed to occur via site-specific applications (LOPA) in advance of an MCR in accordance with Section 22 of the <i>Planning Act</i>. The proposal represents a "minor rounding out" adjustments to the rural settlement area. As such, the additional policies of Section 2.2.8 are not applicable to the proposal.</p> <p>Similarly, Section 7.10.2.12 provides policy direction and criteria for expansion to a Rural Service Centre through a Regional Official Plan Amendment based on municipal comprehensive review. As indicated above, the new Growth Plan now permits boundary expansions up to 40 hectares outside of a municipal comprehensive review process, which serves as the implementation mechanism for the development proposal. As such, Section 7.10.2.12 is not applicable.</p>
2.	Regional staff notes that at this time, the Province has released land base and agri-food network mapping of the Provincial Agricultural System for the Greater Golden Horseshoe, as directed in the Provincial Growth Plan. As well, new Provincial Plan policy and guidelines have come into effect and apply to this AIA, which are discussed below.	Stantec	Noted.
<i>Preliminary Comments:</i>			
1.	The AIA should be reviewed to clearly define the difference between the Chickadee Lane lands and the surrounding study areas that are being assessed through this AIA and the prior BRES AIA study. A description and mapping of the AIA study area, the BRES AIA study area and the subject lands should be included to explain the difference between each of these areas.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. However, the AIA clearly defines the Chickadee Study Area in Section 1.3 of the Report (pg. 1.1). A corresponding map (Figure 1- Location Map) can be found in Appendix 'A'. Similarly, Section 1.2 of the BRES AIA clearly defines the Study Area including the ROA's (See Figure 1 – Study Area)
2.	If the AIA is relying on the AIA study prepared by Colville Consulting in 2014 a copy of the report should be included with the submission as an appendix to the report for easier reference and completeness of documentation. As well, analysis or materials that are referenced in the Stantec AIA have not been included.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The AIA draws upon the finding of the Colville Report (2014) including previous research and its general conclusions. A copy of the Colville Agricultural Impact Assessment can be provided as an appendix to the Stantec AIA.
3.	The report should be reviewed and revised, as necessary, to more clearly document how the relevant policies of the PPS, Growth Plan and Regional Official Plan have been assessed with appropriate policy references along with concluding opinions that policies have been satisfied.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
<i>Section 2.2 Field Inventories:</i>			
1.	There is reference to agricultural and non-agricultural land uses within the Study Area. Definitions for agricultural and non-agricultural land uses and sources should be included.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
<i>Section 3.0 Policy Framework:</i>			
1.	Section 3.1 Provincial Policy Statement should be updated to reference and address the applicable policies of the 2020 PPS, which came into effect on May 1, 2020. - 1.1.3.8 - 1.7.1 i) - 2.3	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Policies in Section 1.1.3.8, 1.7.1i) and 2.3 can be addressed in the AIA report, however its findings and conclusions will not change.
2.	While Section 4.6 of the AIA does contain a discussion of the new "The Minimum Distance Separation (MDS) Document Formulae and Guidelines for Livestock Facility and Anaerobic Digester Odour Setbacks" (Publication 853), this reference should be brought forward to Section 3.1 as it is an applicable Provincial guideline implementing direction of the Provincial Policy Statement (PPS). The AIA also references that the 2016 MDS I	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. MDS software calculations will be reviewed with the most up to date Publication 853 reference, however the findings and conclusions of the AIA Report will not change.

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	Formulae was used in the AIA (page 4). The draft MDS implementation guidelines were released in 2016, with the final release, including a technical update, as Publication 853 in 2017. The AIA should confirm that the most current version of the MDS Document, and its software, has been used for the MDS analysis in the AIA.		
3.	Section 3.2 Growth Plan – this section should be updated to reference and address the applicable policies of the 2019 Growth Plan, which came into effect on May 16, 2020. - Policies in Section 2.2.8 - Policies in Section 4.2.6	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Policies in Section 2.2.8 3. f), g), h) & j) and 4.2.6) can be addressed in the updated AIA Report, however its findings and conclusions will not change.
4.	Section 3.3 Greenbelt Plan – this section should be updated to reference and address the applicable policies of the 2017 Greenbelt Plan as indicated below to clarify how the non-agricultural uses in the Greenbelt portion of the settlement expansion are being justified. - Policies in Section 3.1.3 - Policies in Section 3.1.6 - Policies in Section 4.1.1 - Policies in Section 4.6	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Policies in Section 3.1.3, 3.1.6, 4.1.1 and 4.6 can be updated in the AIA report, however its findings and conclusions will not change.
5.	With respect to conformity to the 2019 Growth Plan and 2017 Greenbelt Plan, the AIA should reference and review the most recent version of the “Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe”, which was released on March 2020, and confirm the current agricultural land base mapping and specifically the prime agricultural area designations that are applicable to the Chickadee Lane expansion.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe, released March 2020 can be reviewed to confirm the current agricultural land base mapping and specifically the prime agricultural area designations that are applicable to the Chickadee Lane expansion, however the general findings and conclusions of the AIA Report will not change.
6.	With respect to the Implementation Procedures and designation of the agricultural land base, the current mapping and description of prime agricultural areas provided in both the AIA and PJR is unclear. Within the Greenbelt Plan Area, the mapping of prime agricultural areas by the Province for the Agricultural System for the Greater Golden Horseshoe is in effect until such time that it is implemented and updated by the Region. Outside the Greenbelt Area, the current Prime Agricultural Area shown on Schedule A in the Region of Peel Official Plan and as refined and designated on Schedule C to the Town of Caledon Official Plan is in effect. These designations should be accurately mapped and shown on the figures in both the AIA and PJR. Portions of the north west and south east quadrants of the Chickadee Lane lands in the Greenbelt are designated prime agricultural area in accordance with the provincial land base mapping. Policies in the 2020 PPS (Sections 2.3.6.1 and 2.3.4.1) and 2019 Growth Plan that do not permit non-agricultural uses or lot creation for non-agricultural uses in prime agricultural areas, such as the proposed municipal active or passive recreational or open space blocks, should be addressed.	Stantec.	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
7.	Both the AIA and PJR should clarify if it is intended that prime agricultural areas are to be redesignated within the Greenbelt for non-agricultural uses. Regional staff will have further comments when revised materials are received.	HPGI / Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Non-agricultural uses including infrastructure, natural resource use, existing uses and lot creation may be permitted in the Agricultural Systems of the Protected Countryside subject to the policies of sections 4.2 to 4.6 of the Greenbelt Plan. These non-agricultural uses are generally discouraged in <i>specialty crop areas</i> and may only be permitted after the completion of an <i>Agricultural Impact Assessment</i> . Section 4.2 states that: <i>All existing, expanded or new infrastructure is permitted within the Protected Countryside, subject to the policies of this section and provided it meets one of the following two objectives:</i> <i>a) It supports agriculture, recreation and tourism, Towns/Villages and Hamlets, resource use or the rural economic activity that exists and is permitted within the Greenbelt; or</i>

	STAFF COMMENTS	ACTION BY	RESPONSE
			<p><i>b) It serves the significant growth and economic development expected in southern Ontario beyond the Greenbelt by providing for the appropriate infrastructure connections among urban centres and between these centres and Ontario's borders.</i></p> <p>Section 4.6 states that:</p> <p><i>Lot creation is discouraged and may only be permitted for:</i></p> <p><i>a) Outside prime agricultural areas, including specialty crop areas, the range of uses permitted by the policies of this Plan;</i> <i>b) Within prime agricultural areas, including specialty crop areas;</i> <i>c) Acquiring land for infrastructure purposes, subject to the infrastructure policies of section 4.2;</i></p> <p>As such, the proposed non-agricultural uses are permitted in the agricultural areas of the Greenbelt Plan as they support growth by providing appropriate infrastructure (i.e. SWM facility) and serve to recognize existing uses (i.e. single detached residential dwellings) which are permitted in accordance with Section 4.5 of the Greenbelt Plan. See Section 4.2 of the PJR (pg. 11 -13).</p>
	<i>Section 4.6 Minimum Distance Separation (MDS):</i>		
1.	Section 4.6 indicates that the MDS analysis is not required due to Guideline #12 which states that MDS 1 need not be applied beyond the point where four or more non-farm residences are encountered by the MDS exclusion arc. This section should be revised to include more information on the applicable properties (see comment above in Section 4.2) to ensure the appropriate analysis has been provided for the conclusions drawn. The livestock farms and intervening land uses should be clearly marked on Figure 4 to illustrate how the settlement expansion complies with Guideline #12.	Stantec	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The AIA report can be expanded to include more information on the applicable properties, however the findings and conclusions drawn will not change.
	<i>Section 6.0 Assessment of Impacts to Agriculture</i> <i>Location of Stormwater Infrastructure in Prime Agriculture Areas:</i>		
1.	Stormwater management facilities in the north-east quadrant appear to be located in the Prime Agricultural Area designation in the Greenbelt. The AIA will need to provide the required justification in accordance with policies 3.1.3.3 and 4.2.1.2 f) of the 2017 Greenbelt Plan. Policy 4.2.1.2 f) specifically requires a demonstration that there are no other reasonable alternatives than the proposed location.	Stantec	Addressed. Greenbelt Plan policy 4.2.1.2 f) directs that new or expanding infrastructure shall avoid specialty crop areas and other prime agricultural areas in that order of priority, unless need has been demonstrated and it has been established that there is no reasonable alternative. The proposed development has evaluated alternative locations for the provision of stormwater management infrastructure and it was determined that the Greenbelt area were preferred from the standpoint of maximizing the utility of the development lands, providing infrastructure to support planned growth and, avoidance of higher quality agricultural land and selecting lower priority lands. Based on the evaluation of the above noted factors, there are no other reasonable alternatives to locate infrastructure elsewhere.
	<i>Section 6.1.4 Agricultural System:</i>		
1.	This section needs to provide additional explanation to address impacts to the Agricultural System land base in addition to the agri-food network. Comments addressing impact to the continuity of the land base for agriculture has been considered should be included in the assessment for completeness of the impact assessment.	Stantec.	Addressed. Impact to the Agricultural System land based has evaluated based on an evaluation of a number of assessment criteria including amount and quality of agricultural land to be removed, presence of agricultural infrastructure or agricultural related land improvements, MDS separation, land tenure and fragmentation and connectivity and compatibility. The finding of this analysis confirms that expansion into the Chickadee Lands will not adversely impact the agricultural land base given the small size of the site, its connectivity and interface with the existing Bolton settlement area, and based on the existing lot fabric and fragmented tenure.
	<i>Section 7.0 Recommendation and Mitigation Measures:</i>		
1.	The Growth Plan contains policies that require impacts to the Agricultural System, both the agricultural land base and the agri-food network to be identified and mitigated.	Stantec	Addressed. Because the Chickadee Lands are not locally owned by an agricultural operated, are comprised of eight existing lots with rural/estate residential development, located immediately adjacent to the existing built-up boundary with no abutting agricultural operations, no mitigation

	STAFF COMMENTS	ACTION BY	RESPONSE
			measures have been proposed. No significant adverse impacts associated with the agricultural system are expected from the proposed development during construction or operational phases, so no mitigation measures are required.
2.	The recommendation that edge planning mitigation along the Greenbelt Plan boundary within the Greenbelt is not required should be expanded to further explain why mitigation is not required (e.g. lands will abut non-agricultural uses and valley lands or lands that are being protected, restored or enhanced for natural heritage system purposes, etc.).	Stantec.	Addressed. The determination that no edge planning treatments would be needed was based on the assessment that no areas have been identified where there may be potential for long term compatibility issues. Primary consideration included the absence of existing surrounding agricultural operations which warrant unique consideration and edge planning protection. It is also noted that the agricultural boundary is already protected in this location through the Natural Heritage System of the Greenbelt Plan which is found in the north-west quadrant and to the east of the Chickadee Lands. These permanently protected areas already function as a rural urban edge and offer a natural buffer between non-agricultural uses.
In addition to comments noted above, the following additional issues need to be addressed in both the AIA and PJR:			
1.	The AIA should include an opinion that the relevant provincial agricultural policies and guidelines have been considered and addressed including: <ol style="list-style-type: none"> a. OMAFRA's Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe, Publication 856 dated March 2020 b. OMAFRA's Draft Agricultural Impact Assessment (AIA) Guidance Document dated February 2018 	HPGI / Stantec	<p>The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.</p> <p>OMAFRA's Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe, Publication 856 was released in March 2020. The PJR and AIA predate the release of this document.</p> <p>The AIA study methodology included a review of all existing and available background information and filed inventories. Background data was collected and reviewed from a variety of sources. This includes provincial and municipal planning documents, provincial resource information and recent air photography. A list of the information sources review is provided in Section 10 of the AIA report.</p>
Comprehensive Environmental Impact Study and Management Plan and Environmental Impact Statement			
<i>General Comments:</i>			
1.	The Region relies on the environmental expertise of the Toronto Region Conservation Authority (TRCA) staff for the review of development applications located within or adjacent to the Greenlands Systems in Peel and their potential impacts on the natural environment.	FOR INFO	
2.	Technical comments from the TRCA indicate some questions, comments, concerns, and requests for information. A response to the TRCA should be provided in the revised submission.	FOR INFO	
<i>Background:</i>			
1.	Regional staff, in conjunction with the TRCA, are reviewing the CEISMP to see how these criteria, as well as the criteria is the Region letter dated February 24, 2020, may be satisfied: <ol style="list-style-type: none"> 1) Existing Conditions and Characterization; 2) Impact Assessment and Detailed Studies; 3) Identification of Core Areas of the Greenlands System; 4) Identification of a conceptual natural heritage system, in consultation with the relevant conservation authorities and other agency staff (e.g. Ministry of Natural Resources); 5) Identification of a conceptual stormwater management plan, in consultation with the TRCA and other agency staff (e.g. Ministry of the Environment and Climate Change); and, 6) Submission of a preliminary implementation plan outlining further approvals, steps, and approvals needed. 		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed as related to the ROPA matter.
<i>Preliminary Comments:</i>			
1.	The Region relies on the environmental expertise of the Toronto Region Conservation Authority (TRCA) staff for the review of development applications located within or adjacent to the Greenlands Systems in Peel and their potential impacts on the natural environment.	FOR INFO	

	STAFF COMMENTS	ACTION BY	RESPONSE
2.	Technical comments from the TRCA indicate some questions, comments, concerns, and requests for information. A response to the TRCA should be provided in the revised submission.	FOR INFO	
Archaeological Assessment and Cultural Heritage Assessment			
<i>General Comments:</i>			
1.	Please refer to all maps on pages 23 onward of the Archeological Assessment. Please also refer to the maps on Page 2 and 18 of Heritage Assessment. The study areas identified in these studies are smaller and not consistent with the developable area proposed draft concept plan submitted. It appears that the area where to proposed pond/park/restoration/and potential supportive grading areas were not considered.		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
2.	Either the concept plan needs to be modified to conform with the boundaries of these studies, or the studies need to be expanded to review the entire area proposed by the applicant. The revised study will require a peer review at the cost of the applicant.		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
Functional Servicing Report			
<i>General Comments:</i>			
1.	A revised report is required to provide the following information for further review and consideration. Regional staff will need the below information in order to determine if the servicing requirements in the Growth Plan have been met.	Candevcon	Functional Servicing Report revised (January 4 th 2020).
<i>Watermain:</i>			
1.	The proposed townhouse portion of the development is located within the boundary of Pressure Zone 6. A 300mm diameter watermain exists on Chickadee Lane. As per the GIS database, a 150mm diameter watermain exists on Glasgow Road. There is no new local infrastructure planned in the vicinity of the proposed development that will benefit the site.	HPGI/Candevcon	Noted.
2.	No single use demand table was provided in the report. No fire flow calculations were included in the report, and no hydrant flow test report was provided. A revised report is required to provide this information.	Candevcon	Information included in revised Report.
3.	The revised report needs to clarify the location of the proposed servicing connections and provide the necessary fire flow demand calculations in order to confirm fire flow capacity within the system.	Candevcon	Information included in revised Report.
4.	The water distribution system must be looped to provide system security.	Candevcon	Noted. Water Network Analysis to be completed at engineering design stage.
<i>Sanitary Sewer:</i>			
1.	The existing sanitary sewers adjacent to this development site are a 250mm dia. sewer on DeRose Avenue, and a 375mm dia. sewer on Emil Kolb Parkway. The FSR mentions that there is a sewer on Glasgow Road which is 300mm in diameter; however, this differs from the Region's records. This information shall be confirmed by the applicant, and the Report updated accordingly.	Candevcon	No mention of sewer on Glasgow Road in FSR? FSR proposed a connection to the 375mm diameter sewer on Emil Kolb Parkway.
2.	There is no new local infrastructure planned in the vicinity of the proposed development that will benefit the site. The PJR should be revised accordingly.	Candevcon	Noted.
3.	According to the FSR, the estimated population is 487, based on 3.5 people per unit (FSR - Table 1); however, as applied in the sanitary design sheet, the estimated population is 1094, based on 175 people per hectare for 6.25 ha of developable area. Further, the calculated peak sanitary flow is reported at 15 .25 L/ s. The calculated peak flow for 487 people (Table 1 of FSR) is only 6.8 L/s. As such, a discrepancy exists between the estimated population reported in Table 1 of FSR and in the sanitary sewer design sheet. The FSR cannot be deemed satisfactory with a discrepancy between estimated population and peak sanitary flow and sanitary design sheet.	Candevcon	The estimated population based on the number of units is always different from the population as given in the Sanitary Design Sheet. A revision is not required to the FSR.
Stormwater Management			
<i>Low Impact Development:</i>			
1.	Regional staff recommend that low impact development best practices be utilized, over and above the minimum requirements, in a manner that is acceptable to the Town of Caledon. Regional staff recommend that any storm water management pond design utilize pre-treatment sediment separation systems that are acceptable to the Town of Caledon.	Candevcon	Comment noted.

	STAFF COMMENTS	ACTION BY	RESPONSE
Traffic Impact Study			
<i>Traffic Development:</i>			
1.	We acknowledge that there are no new accesses proposed to Emil Kolb Parkway (EMP);	GHD	Noted.
2.	We require further clarification as to why the northbound and southbound PM future background volumes were directly derived from the Bolton Residential Expansion Study; however, the AM future background volumes were derived by applying the growth percentage to the PM 2017 traffic counts;	GHD	Addressed. The BRES study completed by Paradigm only forecasted future traffic volumes for the PM peak hour as such PM peak hour represents the highest generated traffic volumes. As a result, GHD had to estimate the AM peak hour volumes from the PM peak hour data.
3.	The study notes capacity issues for the westbound left turning movement during the AM and PM peak hours, and suggests the signalization of EMP at the Connecting Road to mitigate; we require a signal warrant analysis to be completed and provided for our review.	GHD	Addressed. A signal warrant for the intersection of Emil Kolb Parkway and the Connecting Road was completed and resulted in traffic signals not being warranted. The warrant will be provided with the next submission.
4.	We require the scope of the study to be expanded to include the adjacent local roads and intersections to determine the impact of the development via a system approach, such as: <ul style="list-style-type: none"> • Glasgow Road at Deer Valley Drive; • Deer Valley at Hickman Street; • Deer Valley Drive at King Street; • King Street/Harvest Moon Drive at Coleraine Drive 	GHD	Addressed. GHD can include these intersections in a future submission but there is not traffic data available in order to complete the analysis. Based on the number of trips generated by the proposed development there will be less than one additional vehicle added to any individual turning movement at any intersection per minute during the peak hours. This volume of traffic is expected is not expected to cause any significant change in operation that would be perceivable from a driver's perspective.
<i>Sustainable Transportation:</i>			
1.	The revised study must discuss how the plan may promote active transportation and public transit.	GHD	Addressed. The revised study can include discussion on active transportation, as for public transit there is no local public transit available nearby that is easily accessible to residents from this area. Future GO transit use will most likely be accessed via vehicle traffic.
2.	Active transportation facilities proposed within the development should connect safely to the Regional active transportation network with appropriate crossings (there is a Multi-Use Trail (MUT) along Emil Kolb Parkway).	GHD	Noted.
3.	Direct active transportation connections between Street C and the MUT along Emil Kolb Parkway should be explored if feasible (if the grading works, etc.).	GHD	Noted.
4.	The planning justification report refers to the proposed future Bolton GO station. Given that this development is aiming to support provincial transit investment, the active transportation network within the site should support the most direct connection to the future GO station site.	GHD	Noted.
5.	The development is adjacent to a paved multi-use trail along Emil Kolb Pkwy and within proximity of signed bike routes. Please consider recommending bike parking for this site. Typically, 1-5 bicycle parking spaces can substitute for a parking space, up to a maximum of 25-30% of total required parking spaces.	GHD	Addressed. The development is comprised of townhouse units which will have bicycle parking provided in the garage of each unit. Bicycle parking spaces and reductions in parking are only sought on higher density sites comprised of condo units or stacked townhouses with a common underground garage.
6.	Consider recommending visible, well-lit bicycle parking for visitors as well as secure, indoor bike storage for residents/tenants.	GHD	Addressed. The development is comprised of townhouse units which will have bicycle parking provided in the garage of each unit. Bicycle parking spaces and reductions in parking are only sought on higher density sites comprised of condo units or stacked townhouses with a common underground garage.
Sustainable Communities			
<i>Comments:</i>			
1.	A Sustainable Community Study was not submitted in support of the application. The Region's letter, dated February 24, 2020, provides direction on this study.	HPGI	The requirements of this study regarding community design, density and mix has been covered off in the HPGI PJR in Sections 5.3.2 and 7 and the CDP, the infrastructure requirements in Candevcons' FSR/SWM Report in Section 5 and natural heritage requirements in Palmers CEISMP in Section 3 and 4. Further a Notice of Complete Application was issued by the Region of Peel dated April 20, 2020, which indicated that all required studies identified by Staff in the Planning Application Requirements Checklist were received and that the Official Plan Amendment Application was found to be 'complete' in accordance with Sections 22 (40 and 950 of the <i>Planning Act</i> . This precedes the Notice of Incomplete whereby a number of comments were provided by Regional Staff which resulted in formal response and updates to the application support materials.

	STAFF COMMENTS	ACTION BY	RESPONSE
2.	Through recent Provincial policy updates including the Provincial Policy Statement, 2020 [e.g. 1.1.3.2 c) & d), and 1.8] and the Growth Plan, 2019 [e.g. 2.2.1.4 f)], policies related to climate change mitigation and adaptation and sustainable community development have been integrated into the land use planning framework to support the achievement of complete communities.	HPGI	Noted. See response above.
3.	Section 1.3.5 of the Regional Official Plan provides a framework for sustainable development. Section 3.7 of the Regional Official Plan provides policy direction on energy, including energy conservation, energy efficiency, and diversity through the use of renewable and alternative energy systems.	HPGI	Noted. See response above.
4.	It is intended that the applicant demonstrate, through the Planning Justification Report (PJR) or supporting study, how the proposed development includes the sustainable community requirements from Provincial policy and the Regional Official Plan. As an example, with regards to greenhouse gas (GHG) emissions, the report should consider how opportunities related to GHG emissions reduction are being incorporated (e.g. planned energy efficiency, building design, transportation, lighting, protecting/enhancing natural heritage, inclusion of alternative and renewable energy systems) into the proposed development to mitigate and adapt to climate change.	HPGI	Noted. See response above.
5.	The guidance and framework prepared at the ROPA stage would setup further evaluation/consideration of climate change mitigation and adaptation actions through further implementation stages of the development process. It is anticipated that this component in the PJR will demonstrate how the proposed development has fully considered the different aspects of sustainable community design and demonstrates conformity with Provincial policy direction and Regional official plan policy requirements.	HPGI	Noted. See response above.
Fiscal Impact Study			
<i>Comments:</i>			
1.	The 2014 FIS is based on the 2012 DC Background Study and by-law which have now been replaced. The study and by-law have been superseded by the 2015 DC Background Study and by-law and this should be reviewed. Further, the 2014 study is based on 2013 dollars. Updated values should be provided for this site. [https://www.peelregion.ca/finance/development-charges.asp].		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
2.	The updated Regional work prepared as part of the Regional BRES process considered additional information and this should be reviewed. [https://www.peelregion.ca/planning/officialplan/bres/assets/BRES-Fiscal-Impact-April-Report-to-PlanningRevisedJune29.pdf]		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
3.	The 2014 FIS purpose, as described in the study, was to look at the final two options that were considered as part of the Town of Caledon's Bolton Residential Expansion process. The review of the rounding out areas was limited in the 2014 study. While some of the conclusions may be relevant to this site in the 2014 study, the PJR must provide a clear up-to-date standalone analysis and summary for the fiscal impacts of this site.		The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
4.	The PJR should direct staff to where the infrastructure costs (Transportation, Water, Wastewater) have been considered for this site in the supporting financial materials. Current Regional Capital and D.C. Impacts and Regional Tax and User Rate Impact should be provided for this site.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The submitted FSR confirms that a sanitary sewer connection is available on Emil Kolb Parkway and water is immediately available to service the site via an existing 300mm diameter watermain located on Glasgow Road and Chickadee Lane. There are no anticipated significant infrastructure costs associated with this connection.
5.	Page 61 of the PJR discusses the impact to Caledon's taxpayers. Reference to Peel Region taxpayers should also be added.	HPGI	Noted. It is assumed the Caledon's tax base forms a portion of the regional tax base.
Real Estate			
<i>Comments:</i>			
1.	The Retail Market Demand Analysis is for 2031 population growth; however, the application is proposed for 2041 population growth. An updated or gap analysis should be provided to speak to the 2041 population growth.	HPGI	A The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. A Retail Commercial Land Needs Analysis was recently completed by the Region of Peel as part of their ongoing Official Plan Update and Municipal Comprehensive Review (Peel 2041). The Report concludes that the proportion of

	STAFF COMMENTS	ACTION BY	RESPONSE
			<p>Caledon's population growth through 2041 to be accommodated on lands associated with Settlement Area Boundary Expansion totals approximately 51,500 residents. Using 20-25 sf per capita as a benchmark of retail-commercial space demand, this results in a demand range of roughly 1.0-1.3 million sf of floor space or 38-48 net hectares of land.</p> <p>By comparison, the Kircher Retail Market Demand Analysis (2014) found that an additional 576,000 sf of new retail-commercial space is required in Bolton through 2031 which translates to a rate of about 48 sf per capita, based on the 11,900 new residents that were anticipated to be added in Bolton through 2031 during the report's forecast horizon.</p>
Noise Study			
<i>Comments:</i>			
1.	If a noise wall is proposed, a warning clause should be added in accordance with Region and Town standards that it the future owner's responsibility to maintain. Appendix B will need to be updated.	HPGI	Addressed. A 3.1m high acoustic fence is proposed for all units in Block 2; a 2.2m high acoustic fence along the south sides of Block 7 and 8; and, a 2.2m high acoustic fence for lot 1 in order to address roadway traffic noise sources generated from Emil Kolb Parkway. A warning clause indicating the owner's responsibility to maintain will be included in the Development Agreement and all offers of Purchase and Sale of the specific lots.
2.	The study will require a peer review at the cost of the applicant.	HPGI	Noted.
Hydrogeological Study			
<i>Comments:</i>			
1.	Prior to approval of any local official plan amendment, a revised report addressing the following will be required to address the following Regional comments:	Palmer	No Action Required.
2.	MOECC well records were reviewed within a 500m Zone of Influence (ZOI) from the site and identified 18 water wells. Of these wells, 9 are domestic water supply. The consultant must provide a figure indicating the location of the MOECC wells within the zone of influence.	Palmer	A figure and table of MECP well records has been provided in the updated hydrogeology report.
3.	A door-to-door well survey shall be conducted in order to confirm domestic wells.	Palmer	Acknowledged. A door-to-door survey will be completed prior to site alteration.
4.	A local well monitoring program of said domestic wells during and post construction must be introduced to confirm that dewatering practices on site will not negatively impact the private wells in the zone of influence.	Palmer	Due to the depth of the water table and the low permeability of the soils, limited to no dewatering is expected. A section addressing this have been included in the updated Hydrogeology Report and hydrogeology sections of the CEISMP Report
5.	Dewatering calculations should be included in the report to confirm whether environmental approvals through the Environmental Activity and Sector Registry or Permit to Take Water is required.	Palmer	A dewatering assessment has been added to the hydrogeology report confirming the limited to no dewatering being expected for site construction.
6.	A contingency plan for private wells and natural features shall be included. The study should be revised to be satisfactory to the TRCA.	Palmer	As the dewatering assessment determine that little to no dewatering will be required, not impacts to private wells or natural features will occur from dewatering. A door-to-door well survey will be completed and submitted to the Region prior to site alteration. Baseline conditions on groundwater levels and the natural environment have already been collected as part of the CEISMP and EIS studies.
Other Matters			
1.	<p>Prior to the review of any other materials, the following must be completed:</p> <ul style="list-style-type: none"> An updated application form - Section 7, Page 4 Payment of actual costs related to the required notice of application as per current fees by-law. This will be forwarded under separate cover to the applicant. 	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.
Future Local Official Plan Amendment Application			
1.	The comments on the supporting studies provided in the letter are for the ROPA only. Regional staff will have further specific technical comments on these studies through the review of the LOPA should a LOPA application be received.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. Please provide your comments on the LOPA application at this time.
TRCA – May 15, 2020			
TRCA Recommendations:			
1.	The Limits of the Natural Heritage System (NHS) have not been adequately derived and illustrated. Revisions to the slope stability analysis are required, which may change the location of the stable valley slope and	Palmer	The Long-Term Stable Top of Slope (LTSTOS) has been incorporated as a limit to the Natural Heritage System (NHS) and mapped (Figures 4, 13 and 13a). This has resulted in adjustments to

	STAFF COMMENTS	ACTION BY	RESPONSE
	consequently, the limits of development. The Long-Term Stable Top of Slope (LTSTOS) and setbacks from the LTSTOS have not been incorporated into the draft plan, which as a result proposes lots partially within the erosion hazard. Once the stability analysis is revised and plotted on applicable plans, setbacks from the stable slope will need to be incorporated into the development plan.		<p>the position of the Storm Water Management Pond (SWMP) in the Draft Plan to remain fully outside the recommended setbacks, including erosion hazards, the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. Adjustment of the SWMP outside the all KNHF and hazard setbacks ensures that these uses are located in accordance with TRCA’s LCP policies</p> <p>On the southeast side of the Project Area the current staked Top of Slope represents the erosion hazard limits. The area below this slope is a tableland (soccer field); without additional erosive forces, the Top of Slope represents the stable slope line.</p>
2.	The stormwater management pond is located within the MVPZ of a significant woodland within the NHS of the Greenbelt’s Protected Countryside.	Palmer	<p>The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. The adjacent planned Restoration Area provide for natural self-sustaining vegetation. In addition, the SWMP is to be a naturalized design; between the Restoration Areas and the SWMP, this plan will effectively enhance and extend the Woodland and NHS features and functions creating a net environmental gain and an overall benefit for the site.</p> <p>Refers to Greenbelt Policy Section 4.2.3</p>
3.	The stormwater management pond encroaches within 10 metres of the constraints associated with the Humber River valley.	Palmer	With the mapping of the LTSTOS and adjustment of the SWMP, the proposed development plan is now outside all KNHF and constraints associated with the Humber River Valley.
4.	Outfall Location – Concerns with potential erosion and ecological impacts to the Humber River valley corridor.	Palmer	<p>Additional fluvial geomorphology field studies have been completed to assess this. See updated fluvial geomorphology assessment completed by Palmer 2020 and included in the CEISMP Report. A detailed baseline assessment of the existing conditions of the Humber River tributary, a comparative analysis to determine the preferred SWM outfall location, and an erosion threshold assessment have all been completed.</p> <p>Based on the results of this work, the outfall has been moved to a more downstream location (Reach A5) with a gentler gradient and higher stability exhibiting more influence from fluvial characteristics than solely gully processes. This outfall location is considered to be the preferred location to discharge stormwater from the proposed development.</p>
5.	Regional Storm Control - Hydrological modelling and Stormwater Management must be revised to ensure that flows are controlled to the Regional Storm event.	Candevcon	
Development Planning and Permitting			
<i>Limits of Development</i>			
1.	<p>The Natural Heritage System (NHS) boundary is established from a number of parameters, including the erosion hazard limit and woodland edge associated with the Humber River valley; however, not all parameters have been accounted for on one submitted plan. The establishment of the NHS boundary ensures that proposed development is appropriately setback from all development constraints. While we appreciate that the draft plan submitted includes various buffer distances for ease of review and some of the applicable constraint lines, the Long-Term Stable Top of Slope (LTSTOS) has not be included as a constraint and will affect the development form.</p> <p>We wish to note that the LTSTOS represents the limit of the Significant Valleyland as a KNHF under the Greenbelt Plan while the LTSTOS and additional 6-metre erosion access allowance represent the erosion hazard limit under the PPS. Note that TRCA’s LCPs require a 10 metre setback from the greater of the valley constraints, which include the LTSTOS. For clarity, for the application of TRCA’s LCP policies, a 10 metre setback would be required from the LTSTOS limit and not 10 metres from the 6-metre erosion access allowance line. A</p>	Palmer	Refer to TRCA Recommendations Comment #1.

	STAFF COMMENTS	ACTION BY	RESPONSE
	revised composite draft plan is needed illustrating the LTSTOS and revised MVPZ from the greater of the constraints, inclusive of the LTSTOS. Please illustrate the various constraints and proposed MVPZ as a wider line for clarity. (Delegated Authority/Regulator/Public Body/MOU/RMA)		
2.	Similar to Comment #1, Palmer Figures 13 and 13a from the CEISMP illustrate the staked top of bank, but not the LTSTOS limit, which forms the greater constraints in some locations on the subject properties. This will affect not only the development form, but also calculated restoration areas. Please revise accordingly. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer	Refer to TRCA Recommendations Comment #1.
3.	Plan IT-1 shows the LTSTOS and staked TRCA line and shows the dashed MVPZ line derived from the CEISMP; however, the plan does not illustrate a 10 metre setback from the LTSTOS or the 6m erosion access allowance. The stormwater management block and townhouse blocks 11 and 12 are not setback 10 metres from the LTSTOS. Also, block 11 appears to be partially located within the hazard. Please revise this plan and others affected to address this issue. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer	Refer to TRCA Recommendations Comment #1.
4.	Figures 13 and 13a from the CEISMP should refer to the top of bank not as the 'O.Reg 166/06' setback but 'LCP setback or TRCA policy'. The setback is derived from the policy program adopted under Section 21 of the Conservation Authorities Act; whereas the regulation under Section 28 describes the areas where TRCA permission is required. (General Comment/Regulator)	Palmer	Noted. This has been adjusted on Figures 13, 13a and 13b.
5.	As noted above in Comment #1, the limit of a Significant Valleyland is the LTSTOS. The CEISMP briefly discusses the PPS and Region of Peel policies related to Significant Valleylands but does not discuss Significant Valleylands as a KNHF under the Greenbelt Plan. The Humber River valley is a Significant Valleyland under the Greenbelt Plan. The Greenbelt Plan nor its associated 2005 technical paper "Technical Definitions and Criteria for KNHF in the NHS of the Protected Countryside Area", prescribe an MVPZ for Significant Valleylands. While not applicable in this application, the ORMCP does prescribe an MVPZ of 30 metres from Significant Valleylands (the limit of the valley as a KNHF being the LTSTOS). For an MVPZ of less than 30m to be considered for Significant Valleylands under the Greenbelt Plan, a thorough justification needs to be provided. (Public Body/MOU/RMA)	Palmer	Refer to TRCA Recommendations Comments #1 and #2. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. ORMCP Policy is a relevant consideration, but not directly applicable to this policy area.
6.	We wish to note that the above mentioned Greenbelt Plan technical paper clarifies that if a KNHF straddles the boundary of the NHS, the portion of the KNHF that is located within the NHS is subject to the natural features policies of the Plan while the portion that is located outside the NHS is not. Thus, the portion of the significant valleyland and significant woodland outside of the Greenbelt Plan Area are subject to the Natural Heritage policies of the PPS (2.1.5). (Public Body/MOU/RMA)	Palmer	Noted. We interpret this statement to mean that the setback encroachments detailed outside the Greenbelt Plan area in Block 2 and Block 11/12 would not be considered as requiring a 30 m MVPZ as per the Greenbelt Plan; therefore, would not constitute an encroachment, as for Block 2, it is not within NHF per the PPS, and remains outside 10 m setbacks as required by TRCA policy. For Block 11/12, the lots have been adjusted to remain outside the 10 m setbacks as required by TRCA policy, thereby avoiding setback encroachments.
7.	The proposed stormwater management pond appears to encroach into the valley corridor and/or 10 m buffer area as noted in comment #3. The proposed facility and its grading should be completely located outside of the valley corridor and buffer in accordance with TRCA's LCPs. Grading accommodations should be achieved without the use of retaining walls. Please revise to conform to TRCA's LCP policies and provide more information in the text of the CEISMP and drawing confirming that these areas will not be impacted either during construction or final grading. (Regulatory/Public Body/MOU/RMA)	Palmer	Refer to TRCA Recommendations Comment #1. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. No retaining walls have been proposed and only very minor grading within the MVPZ is planned. No grading within the 10 m LTSTOS setback will occur.
8.	Staff recognizes that Section 4.2.3 of the Greenbelt Plan provides exceptions for the location of naturalized SWM ponds within portions of the Protected Countryside that define the major river and valleys that connect the Niagara Escarpment and Oak Ridges Moraine to Lake Ontario (The Humber River is identified as a major river and valley in this case), provided that they are located a minimum of 30 metres from a river or stream, and are located outside the MVPZ of any other KNHF or KHF. It would appear that the proposal does not fully achieve this policy as the stormwater block is within the MVPZ of the significant woodland, another KNHF. In order to achieve a 30 metre setback from the significant woodland boundary, the development form would be significantly impacted. As advisers to the Region and Town on the application of the Greenbelt Plan policies, we suggest that the proposal does not conform with this portion of policy 4.2.3 and this should be addressed in the next submission. (Public Body/MOU/RMA)	Palmer	Refer to TRCA Recommendations Comments #1 and #2. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ.

	STAFF COMMENTS	ACTION BY	RESPONSE
	Outfall and Erosion		
9.	<p>TRCA's 2012 Stormwater Management Criteria specifies the careful siting of stormwater pond outfalls in order to limit impacts to the natural heritage system. The criteria note that disturbance to forested valley slopes and adjacent wooded or wetland habitats needs to be avoided and/or minimized to the extent possible. The guidelines also specify that "TRCA generally does not permit stormwater pond outfalls to discharge directly to the creek or at the top of steep valley slopes. Storm pond outfalls require flow dissipation measures such as plunge pools, or equivalent, to reduce erosive velocities at the end of pipe." Further, the Greenbelt Plan under Section 4.2.3.5 stipulates that the objective of the stormwater management plan is to minimize impacts on receiving watercourses in order to avoid increases in stream erosion. To this end, TRCA staff have concerns with the siting of the proposed pond outfall and its potential impacts on the adjacent valley as detailed below.</p> <p>Part B CEISMP - Impact Assessment - 8.2.2 recognizes the potential for erosion and proposes erosion control measures; however, the potential impacts as a result of erosion have not been fully assessed. The CEISMP proposes naturalized armouring of the Reach 1 gully downstream of the SWM outfall. A full erosion assessment utilizing continuous hydrology modelling has not been completed and is required as noted in TRCA engineering comment #21 below. As you'll note throughout TRCA technical staff comments, there are significant concerns with long-term erosion and potential slope instability associated with the concentration, duration, and rate of stormwater to be released from the proposed stormwater management facility. The same concerns are echoed from TRCA property staff as an adjacent landowner of the Humber River valley.</p> <p>The above concerns necessitate, as is noted in our technical comments below: a thorough assessment of stormwater outfall alternatives (exploration and documenting the possibility of connecting to municipal system); and should it be found that no alternative outlet exists, a thorough assessment of the existing channel reach downstream of the outfall, potential erosion of the valley, TRCA property, and banks of the Humber River; and an evaluation of mitigation options for the outfall and outfall flow path and assessment of ecological impacts for each option. (Delegated Authority/Regulator/Public Body/MOU/RMA)</p>	Palmer	<p>Additional fieldwork was completed to thoroughly document existing conditions of the defined gully network and channels that descend into the Humber River Valley, draining the northwest corner of the subject property. Please refer to the existing conditions memo included in this submission.</p> <p>In addition, an options assessment for three proposed stormwater management drainage alternatives to document the feasibility of each option from a fluvial geomorphological, Ecological and engineering perspective is being prepared. From a fluvial geomorphological and ecological perspective Option B (Reach A5), is preferred, as it is proposed to outlet into a stable section of the drainage network and avoid erosion sensitive reaches. Refer to Figure 1 in the existing conditions memo for approximate alignments and outlet locations.</p> <p>CEISMP Part B, the SWM Plan / FSR Report and the Draft Plan have been adjusted based on these results.</p>
10.	<p>Erosion Threshold Assessment – We note that the on-site observations included snow cover at reaches 2 and 3. Additional site study is needed as recommended by Palmer. Should alternatives to stormwater draining to the valley corridor not be feasible as suggested, we look forward to the additional site study as part of the thorough erosion assessment required in Water Resource Comments above. (Delegated Authority/Regulator/Public Body/MOU/RMA)</p>	Palmer	<p>An erosion threshold assessment was completed based on the preferred pond outlet location. The results are provided in the CEISMP Report.</p>
	Other Comments:		
11.	<p>The Planning Justification Report (PJR) indicates that Restoration Block 34 will remain in private ownership and the restoration area will be zoned Open Space with a conservation easement. Based on our collective experience, we are of the opinion that conservation easements are ineffective in practice over the long-term and difficult to enforce under common law when issues arise. Also, restoration blocks should be public blocks such that any future decision regarding their existence is subject to a public process. It is our recommendation that the restoration block be separate from the adjacent private residence and placed into public ownership for long-term conservation. (Regulator/Public Body/MOU/RMA)</p>	HPGI	<p>Further discussion regarding this request will need to be undertaken.</p>
12.	<p>It is our expectation that through these combined planning processes that the NHS will be placed in an appropriate protective land use and zoning category and gratuitously dedicated into public ownership for long-term conservation. (Public Body/MOU/RMA)</p>		
13.	<p>We suggest that for the purposes of the ROPA and LOPA, the PJR expand the policy analysis concerning conformity with Sections 3.1 and 2.1 of the PPS. We also suggest that additional text is needed with respect to conformity with the NHS and Water Resource System (WRS) policies under the Growth Plan. (Public Body/MOU/RMA)</p>	Palmer	<p>The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed.</p>
14.	<p>Lots 27 and 28 are existing residential lots and we understand that the existing dwellings have been or will be demolished. Please clarify the future intent of these lots. It should be noted that if the dwellings remain in situ,</p>	HPGI	<p>Further discussion will be required between the applicant and TRCA on this matter.</p>

	STAFF COMMENTS	ACTION BY	RESPONSE
	there may be limitations to any future expansion due to the adjacent valley corridor and erosion hazard and the ability of a future proposal to conform with TRCA's LCP policies. (General/Delegated Authority/Regulator)		
15.	Park Block 29 – The area proposed as a park block for passive recreation is within the MVPZ of the adjacent valley and woodland. It is TRCA's expectation that the MVPZ is fully restored with self-sustaining vegetation, fulfilling its function as a protective buffer to the adjacent natural system; this conflicts with the proposed use of this area for passive recreation, which could include the possible provision of trails and picnic areas. While we recognize that the Greenbelt Plan permits passive recreation uses within the NHS, we are of the opinion that proposing to utilize the NHS as parkland for a proposed adjacent residential development utilizing was not the intended vision of the passive recreational policies in the Plan. We suggest that the MVPZ be placed in a protective land use and zoning category and not as designated park space. At minimum, the passive parkland must be located outside of the 10-metre valley corridor setback in accordance with TRCA's LCP policies. (Regulator/Public Body/MOU/RMA)	Palmer	It has been clarified that the passive recreation uses were intended to be a pathway and bench features on the berm of the SWMP, which will also serve as SWMP maintenance access. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. Adjustment of the SWMP outside the all KNHF and hazard setbacks ensures that these uses are located in accordance with TRCA's LCP policies. The area noted as Restoration Area on Figure 13a is to be dedicated to restoration with self-sustaining vegetation, fulfilling its function as a protective buffer to the adjacent natural system and placed in a protective land use and zoning category. The notations for passive recreational uses and restoration are will be adjusted on Figure 13a and within the CEISMP to reflect the above.
16.	The proposed water balance relies on infiltration galleries and the addition of 2-3m of topsoil. A preliminary grading plan or description of the proposed earthworks to be undertaken at detailed design should accompany the revised submission to demonstrate the feasibility of the proposed water balance measures at this time. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer/ Candevcon	Acknowledged.
Water Resources Engineering			
17.	It was noted that the proposed stormwater management pond will provide water quantity controls for the site for 2-100-year storms. We note that this proposed urban expansion was not included as future development area in the current 2017 Humber Hydrology Update. Any urban expansion and its associated Regional storm peak flows excluded in the approved Hydrology Update, must be controlled to the existing Regional storm peak flows. Please adjust the hydrologic model and SWM sizing calculations to include the Regional storm event. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Candevcon	Comment noted; will be addressed as part of the engineering design.
18.	As identified in the Humber River Hydrology update, the 6-hour or 12-hour AES storm distributions must be utilized for hydrologic assessment within this watershed. The storm requiring the greater storage volume to provide quantity control should be chosen. Please re-run the hydrologic model using both 6-hour and 12-hour storm distributions and select the most conservative, for sizing purposes. Please provide a digital copy of the model for review. Please contact Jairo Morelli, TRCA engineer at jmorelli@trca.on.ca if the AES storm distribution files are needed. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Candevcon	Comment noted; will be addressed as part of the engineering design.
19.	It appears that a portion of the subject area drains to northwest and the remaining drains to the east; however, there is not a clear indication on the existing and proposed drainage patterns or divides. Please provide a drainage plan for both the existing and post-development conditions along with associated hydrologic parameters and drainage patterns. Please provide a discussion on why only 7.0 out of the total 10.08 hectares would be treated by the proposed stormwater management facility. It should be noted that overcontrol would be required within the pond should any area be left uncontrolled, due to existing topographic constraints. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Candevcon	Existing drainage patterns are shown in the CEISMP; all of the subdivision area drains to the Humber River. The 7 ha is the area of the subdivision property that is being developed.
20.	Table III of the submitted FSR shows that the proposed SWM pond will provide enhanced level (80% removal of total suspended soils) treatment. This is acceptable. (Regulator/Public Body/MOU/RMA)	Candevcon	Noted.
21.	It is noted the proposed SWM pond outlets to the HDF running northwest. It is our understanding that the discharge from the SWM pond to the HDF may cause significant stream erosion which will lead to gully development within the valley. A full-fledged erosion assessment should be conducted using a continuous hydrology model to determine the erosion control criteria for the site. Please note that this erosion assessment should be completed as per the methodology referenced in Section 4 and Appendix B of TRCA's SWM Criteria Document. (Delegated Authority/Regulator/Public Body/MOU/RMA/Landowner)	Palmer/ Candevcon	Additional fluvial geomorphology field studies have been completed to assess the risk of erosion. See updated fluvial geomorphology assessment completed by Palmer 2020 and included in the CEISMP Report. A detailed baseline assessment of the existing conditions of the Humber River tributary, a comparative analysis to determine the preferred SWM outfall location, and an erosion threshold assessment have all been completed.

	STAFF COMMENTS	ACTION BY	RESPONSE
			<p>Based on the results of this work, the outfall has been moved from its original location in an ephemeral gully, to a more downstream location (Reach A5) with a gentler gradient and higher stability exhibiting more influence from fluvial characteristics than solely gully processes.</p> <p>The established erosion threshold (0.058 m³/s) is very similar to the proposed 2-year storm event discharge from the SWM pond (0.057 m³/s) (FSR Report, Candevcon, 2020). This indicates that the receiving watercourse should be able to handle more frequent, smaller discharge events from the SWM pond without exceeding the erosion threshold. It is natural and expected that discharge in the intermittent channel would exceed this threshold during infrequent events (e.g. 100-year storm). The pond discharge following the 100-year storm (178 L/s) is less than the estimated bankfull discharge, further supporting the conclusion that erosion and channel instability in Reach D2 will not be increased from the proposed development.</p>
22.	Please adjust the water balance assessment as recommended by TRCA hydrogeology staff. Please adjust the calculations by using more representative hydrologic data from a climate station closer (to the subject land) than those from Pearson. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer	Completed. Please see the updated Hydrogeology Report.
23.	Regardless of the global water balance requirements (i.e. the water balance component which addresses ground water recharge for SGRAs or LGRAs as may be applicable), TRCA's minimum water retention target for erosion control (i.e. on-site retention of 5mm runoff) as defined in TRCA's SWM Criteria Document should also be met. Please provide documentation in the FSR acknowledging TRCA's 5mm retention target from the criteria document and specify how the current plan achieves this criterion. TRCA's current strategy to address water balance for sites such as this one is to retain 5mm runoff on site through infiltration, vapor-transpiration and/or reuse, to reduce runoff volumes to receiving waters. At this stage, please provide plans that identify the potential locations of the proposed LID measures and amended soils and, preliminary calculations that demonstrate how the onsite retention target will be achieved. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Candevcon	The Infiltration Trenches are shown on Drawing IT-1. Section 6.4 of the FSR provides the calculations to demonstrate that the TRCA requirement of 5mm retention is met.
24.	Erosion prevention and Sediment Control (ESC) measures shall be implemented to mitigate erosion and sediment processes during construction. The mitigation measures shall conform to the Erosion and Sediment Control Guidelines for Urban Construction (December 2006), as may be amended. At the detailed design stage, please provide an ESC plan with details locations and supporting calculations for the proposed measures. (Advisory for Detailed Design)	Candevcon	Comment noted.
Hydrogeology			
25.	TRCA Hydrogeology staff support in principle the proposed expansion of the Bolton settlement area boundary. However, there are feasibility concerns regarding the water balance and LIDs. (General Comment)	Palmer	Acknowledged.
26.	TRCA staff appreciates the use of a 30-year climate normal. Toronto Pearson International Airport (786 mm/a) is known to reflect some of the lowest precipitation values within TRCA. For comparison, TRSPA water balance application predicts a climate normal of 858 mm/a within proposed site. Please utilize TRSPA water balance application values and/or a closer climate station in future water balance submissions. (Delegated Authority/Regulator/Public Body/MOU/RMA) a. Please note that underestimating the precipitation will in turn result in an underestimation of the runoff and recharge which may require changes to the proposed LID infrastructure required to address the post-mitigation water balance.	Palmer	The Hydrogeology Report has been updated with data from the Albion Field Centre Climate Station.
27.	In order to evaluate functionality of proposed LIDs, please overlay Figure 4 of the Hydrogeological Report onto Drawing IT-1 Infiltration Plan. At detailed design, please provide a profile drawing of proposed infiltration trenches. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer/ Candevcon	Acknowledged. The groundwater level contours can be added to Drawing IT-1 and design provided as part of detailed design.
Geotechnical Engineering			
28.	Geotechnical Report by Soil Engineers Ltd.; Dated July 2018: Section 6: Slope Stability Study: Section A-A:	Soil Eng	A Supplementary Slope Stability Assessment was completed by Soil Engineers (2020) to determine slope stability and the Long-Term Stable Slope Line (LTSSL or LTSTOS). This constraint

	STAFF COMMENTS	ACTION BY	RESPONSE
	<p>TRCA staff require the determination of the LTSTOS with a minimum factor of safety of 1.5 for slope stability as per the TRCA Geotechnical Design and Submission Requirements (November 2007) (http://www.trca.on.ca/dotAsset/40047.pdf).</p> <p>The slope stability analysis for the Section A-A resulted in a minimum factor of safety of 1.393, which is less than 1.5; however, it appears as per the slope stability analysis results for the Section A-A (See Drawing No. 4) that this minimum factor of safety is limited to the lower slope and the top of slope meets a higher factor of safety. Please have Soil Engineers review the Section A-A and confirm that the LTSTOS shown on the Drawing No. 7 still includes an adequate setback to meet a factor of safety of 1.5 for slope stability as well as the toe erosion allowance of 5 m. If it does not meet, it is required that the Section A-A be reanalyzed to obtain the position of the LTSTOS corresponding to a minimum factor of safety of 1.5 for stability as per the TRCA requirements along with a 5 m toe erosion allowance recommended by the report. Please also revise the Drawing No. 7 appending the report showing the LTSTOS line accordingly. Please submit the results of the further assessment for the Section A-A in the form of a revised slope stability report or an addendum slope stability report by Soil Engineers Ltd. (Delegated Authority/Regulator/Public Body/RMA/MOU)</p>		<p>has been added to the CEISMP Constraints Mapping and Draft Plan. All proposed development is location outside of the 10 m LTSTOS and the 10 m setback.</p> <p>Soil Eng (2020) revised the cross sections and the FOS such that they were all above 1.5.</p>
29.	<p>Geotechnical Report by Soil Engineers Ltd.; Dated July 2018: Section 6: Slope Stability Study: Page 15:</p> <p>In addition to the assessment for Section A-A, please also revise the text of the first paragraph of Page 15 accordingly as the TRCA requires the determination of the LTSTOS with a minimum factor of safety of 1.5 for slope stability as per the TRCA Geotechnical Design and Submission Requirements (November 2007) (http://www.trca.on.ca/dotAsset/40047.pdf). (Delegated Authority/Regulator/Public Body/RMA/MOU)</p>	Soil Eng	See comment above
30.	<p>Geotechnical Report by Soil Engineers Ltd.; Dated July 2018: Section 7: Discussion and Recommendations: Page 17: Paragraph 2:</p> <p>See the comments above for the slope stability analyses. Please revise accordingly. (Delegated Authority/Regulator/Public Body/RMA/MOU)</p>	Soil Eng	See comment above
31.	<p>Geotechnical Report by Soil Engineers Ltd.; Dated July 2018: Geotechnical Recommendations for SWM Pond:</p> <p>The geotechnical report does not provide the pertinent geotechnical design recommendations for the proposed Block 30 SWM Pond. The geotechnical report should be updated at detailed design to include the geotechnical design report for the SWM pond including the side slopes, construction materials, site preparations and berms, where applicable.</p> <p>The following presents TRCA’s geotechnical design recommendations for the SWM Pond:</p> <ul style="list-style-type: none"> • For in-ground sections <p>For the SWM ponds, the geotechnical recommendations should determine:</p> <ul style="list-style-type: none"> – Admissible side slope based on the in-situ soils and native stratigraphy; – If a liner is required for the pond including the specifications; – If native soil can be re-used for the construction including the liner; – Site preparations, specifications for various elements of the SWM Pond and construction methodology; – Mitigations against the impact of groundwater such as uplift and including their design. <ul style="list-style-type: none"> • For the SWM Pond sections, which act as a berm: <p>The geotechnical recommendations for the berms should be developed by a geotechnical engineer to ensure that they have adequate side slopes for the long-term stability. Furthermore, the SWM Pond including the berms should be properly designed to ensure that the seepage does not negatively impact the berm stability.</p>	Soil Eng	Acknowledged. Additional details will be provided at detailed design. Some of these requirements have been addressed in the updated Hydrogeology Report.

	STAFF COMMENTS	ACTION BY	RESPONSE
	<p>The berm materials should also be appropriately specified so that the risk of seepage and/or soil piping be mitigated.</p> <p>The geotechnical design is also to provide the specifications of the berms including the appropriate backfilling, subgrade preparations, feasibility of re-use of native soil including all necessary preparations, construction methodologies and recommendations, specifications for liner, where applicable, mitigation of adverse impacts by groundwater such as uplift, etc. Additionally, minimum acceptable berm width at the crest should also be recommended by a geotechnical engineer. The cross-sections should be reviewed by a geotechnical engineer and submitted to the Town as signed and sealed by a Licensed Professional Engineer. (Advisory comment for the applicant and municipality for detailed design)</p>		
32.	<p>Draft Plan of Subdivision:</p> <p>The draft plan of subdivision does not show the LTSTOS line corresponding to the setback required against the erosion hazards. The LTSTOS line as per the slope stability report must be plotted on the draft plan of subdivision along with other constraints of development. (Delegated Authority/Regulatory/Public Body/RMA/MOU)</p>	Soil Eng	The LTSTOS line is now included on the Draft Plan.
33.	<p>ELS report: Site Plans: Figure 4: Preliminary Constraints and Opportunities & Figures 13, 13a & b: proposed Development Plans:</p> <p>The constraints of development and proposed development plan site plans do not show the LTSTOS line for the erosion hazards. The Long-Term Stable Top of Slope (LTSTOS) line determined by the slope stability study must be plotted on the site plans along with other constraints of development. (Delegated Authority/Regulatory/Public Body/RMA/MOU)</p>	Palmer	Refer to TRCA Recommendations Comment #1.
34.	<p>EIS report: Section 9.1: Setbacks and Buffers: Sub-section 9.1.1.: Valleylands:</p> <p>The LTSTOS also must be used as one of the constraints to determine the limit of development where it is further setback than the staked feature. (Delegated Authority/Regulatory/Public Body/RMA/MOU)</p>	Palmer	Refer to TRCA Recommendations Comment #1.
35.	<p>EIS Report & FSR: Drawing IT -1 : The drawing shows an outfall discharging from Block 30 SWM pond to a steep slope; this is a potential significant issue due to the following: (i) Discharge can cause erosion and/or saturation of the steep slopes with potential risk of instability, and additionally (ii) the outfall, pipes and facilities associated for the proposed work are located within the erosion hazard as they encroach into the LTSTOS line as shown on both the Drawing IT-1 and Drawing No. 7 of the geotechnical report showing the LTSTOS line. Therefore, they will likely be undermined by the erosion hazard and slope instability process in the long-term.</p> <p>If possible, please revise the plan to avoid the outfall encroaching and/or discharging into the steep valleys. Should a potential relocation of the discharge point for the site not be possible, the slope stability analysis must be revised to address the outfall and discharge's impact on the adjacent slope's stability both in the short and long-term.</p> <p>(Delegated Authority/Regulatory/Public Body/RMA/MOU)</p>	Palmer	Refer to TRCA Development Planning and Permitting - Outfall and Erosion Comment #9.
Natural Heritage			
36.	<p>Please note that the CEISMP and the Slope Stability Report illustrate different SWM Blocks and SWM Pond locations. Please ensure all documents and plans are coordinated within future submissions. (General)</p>	General	
37.	<p>Please note that infrastructure (e.g. SWM Ponds), and all supporting components (e.g. outfalls/spillways), should be located outside of all KNHFs and their associated MVPZs unless it has been demonstrated that there are no other alternatives. There appears to be enough area to locate the SWM Pond outside of the MVPZ. Moreover, there may be opportunities to coordinate any potential outfalls with existing municipal</p>	Palmer/ Candevcon	Refer to TRCA Recommendations Comments #1 and #2. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ.

	STAFF COMMENTS	ACTION BY	RESPONSE
	infrastructure (e.g. roadside ditches, roadside spillways etc.) and/or split flows in efforts to reduce centralized concentrated flow and minimize cumulative impacts to the Natural System and TRCA property. (Public Body/MOU/RMA)		
38.	Figure 13 of the CEISMP does not include the SWM Pond or existing residential uses in lots 27 and 28 within the calculated encroachment area. We suggest that the CEISMP and figures are updated to quantify all unavoidable encroachments into the MVPZ and provide for appropriate compensation for the loss in area. Please revise the development limits to either achieve the full 30 m MVPZ for all development or provide a modified buffer that demonstrates no net loss in net buffer area and provides better protection of the functions of the features. Furthermore, staff recommend that any compensation for loss in MVPZ area should be done in a manner that directly abuts and adds to the NHS. (Public Body/MOU/RMA)	Palmer	Please refer to TRCA Recommendations Comment #2 and 37. The SWMP has been redesigned to fall outside the LTSTOS 10 m setback and all other KNHF and hazard setbacks, including the 30 m MVPZ. For Existing Lots 27 and 28, no alterations are proposed, and as previously developed existing lots of record, do not represent a loss or encroachment per the Greenbelt Plan with respect to the project.
39.	Please provide a discussion within the NHE that describes appropriate areas for the siting of stormwater management outfalls that are ecologically justified. Consideration for locating the outfall should be made from a water balance perspective (e.g. supply of clean water) as well as avoiding sensitive and highly erosive areas. Any alterations to natural features to accommodate the outfall (e.g. erosion controls) should be avoided and infrastructure should be co-located outside of the NHS to the greatest extent possible. Please update the CEISMP to identify appropriate locations from an ecological standpoint, where infrastructure that supports the SWM strategy (e.g. outfall structures, enhanced grass swales, etc.) can be located. If all options to avoid a new outfall within the valley have been exhausted, please update the CEISMP to justify the required location and identify the natural features (e.g. Headwater Drainage Features, Significant Woodland, Significant Valleyland etc.) that are to be impacted, determine the potential ecological impacts (e.g. erosion, vegetation removal etc.), and provide appropriate mitigation and compensation for those impacts. (Regulator/Public Body/MOU/RMA).	Palmer	Please refer to TRCA Recommendations Comment #2 and 37.
40.	As noted above, the feasibility of the infiltration trenches must be confirmed at this stage as TRCA staff must ensure that suitable areas and alternatives are available prior to draft plan approval in the event that the current LIDs proposed do not achieve the minimum water balance target. (Delegated Authority/Regulator/Public Body/MOU/RMA)	Palmer	Soil percolation rate estimated and water table data are included in the updated Hydrogeology Report.
41.	The receiving watercourse, the main Humber River, supports cold water species. Coldwater species are intolerant of temperatures exceeding 22 degrees Celsius and outflow from the stormwater management pond would exceed this temperature during the summer months. Please identify the measures to be incorporated to mitigate thermal impacts from stormwater released from the proposed stormwater management facility. For more information on mitigation measures, please visit TRCA’s STEP website. (Regulator/Public Body/MOU/RMA)	Palmer/ Candevcon	A bottom draw from the SWM pond is proposed to mitigate impacts to coldwater fisheries.
42.	A feature-based water balance analysis could not be located within the CEISMP. A feature-based water balance is required for all hydrologically sensitive features in which stormwater is proposed to be discharged to. Please refer to the TRCA Water Balance Guidelines for the Protection of Nature Features to first determine if the sensitivity, change in catchment size, and form of the development require a feature-based water balance where impacts are likely. Please either provide a requisite water balance or provide the necessary documentation demonstrating that one isn’t require based on the above criteria document. (Regulator/Public Body/MOU/RMA)	Palmer	No features were identified on or adjacent to the site that necessitate the need for a feature-based water balance assessment. A site wide water balance was completed to balance the pre-to-post development infiltration to the best extent practical. A 4% increase in infiltration is expected from the proposed LID mitigations.
MINISTRY OF MUNICIPAL AFFIARS AND HOUSING – AUGUST 5, 2020			
Greenbelt Plan Area			
1.	MMAH staff note that a portion of the proposed expansion area is located within the Greenbelt Area. Greenbelt Plan Policy 3.4.2.1 and A Place to Grow Policy 2.2.8.5 c) prohibit settlement area boundary expansion into the Greenbelt Area	HPGI	Addressed. The proposed expansion does not include the portions of lands identified in the Greenbelt Plan Are. The application proposes to include 5.69 hectares of Prime Agricultural lands

	STAFF COMMENTS	ACTION BY	RESPONSE
			located outside of the Greenbelt in the Settlement Area Boundary as part of the Bolton Rural Service Centre.
2.	The Application also identifies stormwater management facilities in the greenbelt Natural Heritage System (NHS) and on lands designated Prime Agricultural Area within the provincial Agricultural System, As outline in Section 4.2.1 of the Greenbelt Plan, such infrastructure requires an environmental approval and needs to meet one of two objectives : 1) support agriculture, recreation and tourism, Town/Villages and Hamlets, resource use or the rural economic activity that exists and is permitted within the Greenbelt; or 2) serves a significant growth and economic development expected in southern Ontario by providing for appropriate infrastructure connections among urban centres.	HPGI	Addressed. The Application proposes to locate a SWM facility in the Natural heritage System of the Greenbelt Plan which is intended to provide essential infrastructure to service the development and has been identified as the best alternative to other areas within the proposed development area. The SWM facility will serve to accommodate forecasted growth in Caledon by providing for appropriate infrastructure connections to the development and the Bolton Rural Service Centre. As such, the SMW facility conforms to the Policy 4.2.1 of the Greenbelt Plan as is provides infrastructure, service and assets which is an essential support for the Province and Region’s growth needs.
3.	In addition, the Greenbelt Plan has specific polices for stormwater management facilities in Section 4.2.3 that must be addressed, including that these facilities be prohibited in certain features and their associated vegetation protection zones. It is recommended that the Region review these policies carefully to ensure that demonstration of the Greenbelt Plan’s criteria has been adequately provided to warrant locating stormwater management facilities in the Greenbelt Area.	HPGI	A Comprehensive Environmental Impact Study and Management Report and accompanying Servicing Plan was prepared by Palmer which demonstrates conformity with the requirements and intent of Section 4.2.3 of the Greenbelt Plan related to planning, location, design and construction practices. The proposed naturalized SWM facility is located entirely out of key natural heritage and hydrologic features. Additionally, the SWM facility is located outside of the 30 metre watercourse buffer. The proposed facility encroaches in the MVP associated with the forested valleyland through this area however, through variable setback compensation as well as restoration and enhancements of this area in order to increase the extent and the diversity of the natural heritage system and establish a net ecological gain to augment the limited encroachment.
Rural Settlements			
4.	It is unclear whether the Region considers the Bolton Rural Service Centre a “Rural Settlement”, as defined in A place to Grow. Policy 2.2.8.5 c) prohibits the expansion of rural settlements prior to the Region completing its municipal comprehensive review. It is recommended that the Region consider whether the Application is proposing to expand a rural settlement, to ensure conformity with A Place to grow.	HPGI	Addressed. In accordance with Section 5.4.5 of the Region of Peel Official Plan, Rural Settlements as identified on Schedule D4 comprise of Villages, Hamlets and Industrial/Commercial Centres located within the Rural System, and are identified in area municipal official plans, the Niagara Escarpment Plan and the Greenbelt Plan. Rural settlements do not include Rural Service Centres. The proposed boundary expansion seeks to include the Chickadee Lands in the Bolton Rural Service Centre. As such, Policy 2.2.8.5 c) of A Place to grow does not apply to this Application.
Assessment of Alternative Locations			
5.	According to the Application, proposed expansion falls within areas currently designated in the Town of Caledon and Peel Region ROP as prime agricultural areas.	Stantec	Noted.
6.	A Place to Grow policy 2.2.8.3 f) requires that prime agricultural areas be avoided where possible. To support the Agricultural System, A Place to Grow requires that alternative locations across the Region be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System in accordance with specific criteria.	Stantec/HPGI	Addressed. All option areas associated with the Bolton (2031) Residential Expansion Area were identified as located within the Prime Agricultural Are, and characterized by the predominance of prime agricultural lands. As such, there are no reasonable alternative locations that would avoid the Prime Agricultural Area. As demonstrated through the 2019 AIA and the 2014 AIA prepared as part of the BRES, Rounding Out Are B consists of a relatively small parcel of land already located adjacent urbanized lands. Overall, these lands have low agricultural priority due to their high level of fragmentation (too small to farm viably), ownership pattern which reelects influence of land speculation, lack of agricultural activity, presence of existing rural estate residential development, and proximity to the existing settlement area. As such, expansion into the Chickadee Lands, along with others, was demonstrated to be the preferred option relative to other prime agricultural areas.

	STAFF COMMENTS	ACTION BY	RESPONSE
7.	The Application is supported by a June 2019 Agricultural Impact Assessment (AIA) which addresses the proposed expansion area. The 2019 AIA references a 2014 AIA that was completed to support ROPA 30 to examine potential areas of urban expansion into prime agricultural lands. It is recommended that the Region ensure appropriate assessment of alternative locations to avoid prime agricultural areas have been adequately examined in relation to the proposed expansion currently before the Region for a decision, to ensure conformity with A Place to Grow policy 2.2.8.3 f).	Stantec/HPGI	Addressed. Through Part A of the AIA completed as part of the BRES, the Town undertook an assessment of agricultural land classification and the MDSA setback requirements for the candidate settlement expansion options (Options 1-6). Part B of the AIA further refined the study area to two preferred expansion options (Options 1 and Option 3 and the Rounding Out Areas) and assessed each through comparative analysis based on an evaluation of potential impacts of settlement expansion. This evaluation of potential impacts considers: <ul style="list-style-type: none"> • An assessment of agricultural priority based on agricultural resources, agricultural investments, mix of land uses, fragmentation and land tenure and the ability to conform to MDS formula; • The number of active farm operations that would be retired or otherwise directly impacted by settlement expansion; • The potential impacts/effects of settlement expansion on adjacent agricultural operations and their practices; • The impact that settlement expansion will have on the agricultural character of the broader area and the implications of agriculture in the future; • The establishment and type of boundary between urban and agricultural lands; and • Mitigation measures and recommendations designed to eliminate or reduce the severity of both direct and indirect impacts on agricultural operation within the adjacent settlement expansion area(s) Based on the above, all expansion options, including the Chickadee Lands, have been adequately examined in the context of policy 2.2.8.3 of the Growth Plan in order to demonstrate conformity.
Minimum Distance Separation Formulae			
8.	A Place to grow policy 2.2.8.3 g) requires that the settlement area expansion comply with the minimum distance separation (MDS) formulae. The MDS formulae is a land use planning tool that determines setback distance between livestock barns, manure storages or anaerobic digesters and surrounding land uses.	Stantec	Addressed. As indicated in the Agricultural Impact Assessment prepared by Stantec and dated June 7, 2019, the MDS I setback requirements are not applicable to the Chickadee Lands due to the implementation Guideline #12.
9.	Based on the 2019 AIA submitted with the Application, it appears that additional information is needed to demonstrate that MDS has been met. The AIA indicates that MDS is not required beyond four or more non-farm residence in the exclusion arc and references Guideline #12. OMAFRA staff note that Guideline #12 allows for reduced MDS setbacks if the four or more uses are of the same sensitivity. Section 4.5.2 of the AIA identifies the proposed use as a Type B land use, therefore, there must be four or more Type B land uses within the intervening area. The AIA should identify which existing uses are considered in the application of Guidelines #12 and should include the extent of the MDS are reduction for each of the applicable occupied and unoccupied livestock facilities.	Stantec	Addressed. Figure 4 of AIA and text in AIA identifies livestock locations and all non-farm residences. Figure 4 can be updated to indicated which non-farm residences apply to Implementation Guideline #12. MDS arcs can be updated to show that the arcs do not impact the subject lands. It should be noted that these revisions will not change the findings and conclusions of the AIA.
Municipal Comprehensive Review			
10.	A Place to Grow policy 2.2.8.5 e) states that, where the settlement area boundary expansion takes place in advance of a municipal comprehensive review, the additional lands and associated forecasted growth will be full accounted for in the lands needs assessment associated with the next municipal comprehensive review. Should Peel Region approve the Application, the expansion will need to be considered in the Region's ongoing land needs assessment through the municipal comprehensive review.	HPGI	The ROPA was approved by the LPAT per its Decision issued on November 10, 2020 re file PL10058 and therefore deemed to have been addressed. The proposed LOPA settlement area boundary expansion seeks to include the Chickadee Lands within the Bolton Rural Service Centre for residential uses. The Regional Official Plan Amendment proposes to include the policy requirement that the land and associated forecast growth of the Chickadee Community is to be accounted for when calculating the lands needed to accommodate growth to the year 2041 through the ongoing municipal comprehensive review (Peel 2041). The draft LOPA has been updated to reflect same.
Key Hydrologic Area			
11.	A 2019 Environmental Impact Study and Management Plan report identified a headwater drainage feature as a preliminary constraint within the proposed expansion area. A Place to Grow policy 4.2.3.2 outlines that, outside of settlement areas, proposals proceeding by way of plan of subdivision may be permitted within a key hydrologic area, where it has been demonstrated that the hydrologic functions, including the quality and quantity of water,	Palmer	Addressed. A Headwaters Drainage Features Assessment (HDF) was completed for the drainage swale located on the lands near Glasgow Road within the proposed settlement area expansion lands. It was classified as having limited natural environmental or hydrologic function and drained

	STAFF COMMENTS	ACTION BY	RESPONSE
	<p>of those area will be protected, and where possible, enhanced and restored through various measures. A Place to Grow includes significant surface water contribution areas (i.e. headwater drainage features) as a key hydrologic area. Should the Region approve the application, it is recommended that the Region ensure effective measures are put in place which adequately address the requirements of A Place to Grow.</p>		<p>to a municipal ditch. Based on our assessment, it did not meet the test to be classified as a Key Hydrologic Feature, and as such was recommended for removal.</p>