



**TOWN OF CALEDON  
 PLANNING  
 RECEIVED  
 Sept.28,2020**

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September 18<sup>th</sup>, 2020

*via email*

Stephanie McVittie, Senior Development Planner  
 Planning and Development – West  
 Community Services Department  
 Town of Caledon  
 6311 Old Church Road  
 Caledon, ON L7C 1J6

Dear Ms. McVittie:

**RE: BLUELAND FARMS LIMITED – PROPOSED OFFICIAL PLAN AND ZONING BY-LAW AMENDMENTS (17736 HEART LAKE ROAD), MHBC FILE ‘13124 A’**

Further to your correspondence outlining Town and agency comments received as it relates to the circulation of the above-noted application, we are pleased to provide a comprehensive response package to the comments received to date. This response has been structured to respond to each of the comments noted in-turn, with reference to more detailed responses provided by the balance of the project team where indicated.

No.	Comment	Response
<b><u>Executive summary of comments</u></b>		
	<i>The Town has circulated the revised documentation to various internal departments and external agencies for review and comment which are explained in detail throughout the letter. A revised submission is required to address comments received to date and further comments will be provided upon receipt and review of the revised submission. Upon receipt of the revised submission, staff will initiate peer reviews of the associated reports and will schedule a Public Meeting pursuant to the Planning Act. The Town is unable to support the proposed Niagara Escarpment Plan Amendment, Niagara Escarpment Development Permit, Official Plan Amendment or ARA Licence at this time.</i>	As discussed, many of the comments are addressed through responses from the various sub-consultants. Report updates are provided where applicable.
<b><u>Detailed comments</u></b>		
(1)	<i>General Information: For property tax purposes, 17736 Heart Lake Road (Part Lot 12, Concession 2 EHS (Caledon) is currently assessed as residential (\$1.42 million CVA). The Town’s share of taxes levied, based on current value assessment is approximately \$7,850. The property tax account as at December 17, 2019 is determined to be current. (Town of Caledon, Finance and Infrastructure Services, Finance)</i>	Noted, thank you. No response required.

No.	Comment	Response
(2)	<i>General Information: The proposed development, as currently circulated, does not include new or additional floor space. Therefore, Development Charges will not be applicable. If the scope changes, the classification and determination may be revised. (Town of Caledon, Finance and Infrastructure Services, Finance)</i>	Noted, thank you. No response required.
(3)	<i>General Information: The Development Charges comments and estimates above are as at December 17, 2019 and are based upon information provided to the Town by the applicant, current By-laws in effect and current rates, which are indexed twice a year. Development Charges are calculated and payable at the time of building permit issuance. Development Charge By-laws and rates are subject to change. Further, proposed developments may change from the current proposal to the building permit stage. Any estimates provided will be updated based on the Development Charges By-law and rates in effect at the time of building permit, and actual information related to the construction as provided in the building permit application. (Town of Caledon, Finance and Infrastructure Services, Finance)</i>	Noted, thank you. No response required.
(4)	<i>The Town's Policy and Sustainability Section is working on an Aggregate Rehabilitation Master Plan for Caledon. Please contact Ohi Izirein at 905-584-2272 x. 4271 or <a href="mailto:ohi.izirein@caledon.ca">ohi.izirein@caledon.ca</a> for additional details on how the Plan may affect the proposed rehabilitation for the site. This may require amendments to the proposed application. (Town of Caledon, Community Services, Planning)</i>	Blueland Farms has been involved in the process to date, and has been in contact with Town staff. The rehabilitation concept reflects the Master Plan.
(5)	<i>There appears to be a discrepancy in the proposed area for extraction between the Niagara Escarpment Plan Amendment and the Town's Official Plan Amendment. Please revise accordingly. (Town of Caledon, Community Services, Planning and Niagara Escarpment Plan)</i>	The correct area is 20.75 ha, per the NEPA application. A revised Town of Caledon OP amendment is enclosed.
(6)	<i>As the reports and supporting material are largely interconnected, please ensure that where amendments are made to a report/plan to address comments noted below, any resulting changes are also made to other reports and material, as required. (Town of Caledon, Community Services, Planning)</i>	Noted. Materials and responses have been reviewed to ensure consistency.
(7)	<i>Any reference to the Provincial Plans in all reports and documents are to be updated to reflect the new 2017 Provincial Plans and provide an analysis on their policies. (Town of Caledon, Community Services, Planning)</i>	The Planning Report addresses all disciplines and relevant policies, and contains references to 2017 policies.
(8)	<i>Detailed comments from the following agencies are attached for your review:</i> <ul style="list-style-type: none"> <li>• Credit Valley Conservation – March 8, 2019</li> <li>• Niagara Escarpment Commission – January 31, 2019</li> <li>• Region of Peel, dated January 30, 2019</li> </ul>	Comments from other agencies are being reviewed by the project team, and responses being prepared for submission shortly.

No.	Comment	Response
(9)	<p>The following comments apply to the <b><u>Archaeological Assessment</u></b> (Stage 1-3), prepared by Archaeologix Inc., dated March 2004:</p> <p>a. The assessment recommended a Stage 4 Assessment and protection of the area until this was conducted. Provide details on what protection measures have been taken and the Stage 4 Archaeological Assessment conducted on the site.</p> <p>(Town of Caledon, Community Services, Heritage)</p>	<p>In order to protect the area in question, an avoidance approach has been taken. The area where the Stage 4 work is required has been excluded from the licence area and extraction area.</p>
(10)	<p>The following comments apply to the <b><u>Built Heritage and Cultural Heritage Landscape Assessments</u></b>, prepared by Harrington McAvan Ltd., dated February 2013:</p> <p>a. Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. Will be addressed in a separate response to NEC staff.</p>
	<p>b. The report should include reference to policies concerning cultural heritage resources as contained within the Niagara Escarpment Plan.</p>	<p>Noted. The Planning Report includes reference to applicable Town and NEP policies regarding cultural heritage. Regardless, the report is being updated as it pre-dates the 2017 NEP.</p>
	<p>c. The report should provide details on which Official Plan (heritage) policies were referenced (i.e. Section 3.2.3) and if the Built Heritage Resource Inventory was referenced.)</p>	<p>The report includes reference to Town criteria for CHL identification, and the Planning Report also addresses cultural heritage policies in Section 8.</p>
	<p>d. Further discussion and a definitive explanation on the historical relevance of the railway is required.</p>	<p>As noted in the cultural heritage report, the Toronto Gray &amp; Bruce Railway once crossed the northeastern part of the property (Sections 5.2, 5.4, 6.0, Figure 8), but there are no longer any remains of the railway present. The area of the former rail line is now used for agricultural use.</p>
	<p>e. Further discussion and detail is required regarding the reference to farming and transportation.</p>	<p>As noted in the report, the property has links to the area's agricultural history (crops, pasture), and also has a former rail crossing as well as early transportation routes (Heart Lake Road).</p>

No.	Comment	Response
	<p>f. Provide the relevant historical facts surrounding the railway and its history with the area, referencing historical documentation, contemporary and primary/secondary sources and ascertain whether the site could be considered as a Cultural Heritage Landscape referencing the Town's Official Plan and the Ontario Heritage Act.</p> <p>(Town of Caledon, Community Services, Heritage and Niagara Escarpment Commission)</p>	<p>The original cultural heritage report and also archaeology report include information related to railway and history, and the cultural heritage report evaluates the significance of the site for cultural heritage purposes. The report concludes that "any physical evidence which would provide historical value and significance are no longer in existence".</p>
(11)	<p>The following comments apply to the <b>Air Quality Assessment</b> prepared by Arcadis Design and Consultancy, dated October 2017, and are to be addressed prior to the Town initiating a peer review of the report:</p> <p>a. Table 3.2, Site Activity Timings suggests different shipping operation times than the Planning Justification Report. Please amend either report to correct the times.</p>	<p>(Updated Air Quality Assessment included as <u>Attachment A</u>)</p> <p>Revisions have been made to the report as necessary.</p>
	<p>b. The Assessment includes a discussion on the proposed landscape and berm design. Open Space staff has noted discrepancies between the site plan drawings with respect to the proposed berm design. Once these discrepancies are resolved, the assessment may require updates. Further updates may also be required to address changes resulting from other comments.</p>	<p>Berm and landscape design has been reviewed and corrected as necessary.</p>
	<p>c. Please refer to the Region of Peel's comments dated January 30, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. Region of Peel comments to be responded to in separate correspondence.</p>
	<p>d. The report is to be stamped by a Professional Engineer.</p>	<p>Included with revised report.</p>
	<p>e. The report will be peer reviewed at the applicant's expense. The Town will work with the Region, Credit Valley Conservation and Niagara Escarpment Commission to draft a terms of reference for a peer review which can be leveraged by all agencies.</p> <p>(Town of Caledon, Community Services, Planning and Region of Peel)</p>	<p>Noted. Comments will be reviewed and applicable responses provided when available.</p>
(12)	<p>The following comments apply to the <b>Geotechnical Report</b> prepared by Harrington McAvan Ltd, dated February 2013, and are to be addressed prior to the Town initiating a peer review of the report:</p> <p>a. The report is to be stamped and signed by a Professional Engineer or Geologist.</p>	<p>The Geotechnical Report was prepared for informational</p>

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		purposes, and is not part of the <i>Aggregate Resources Act / Planning Act</i> requirements. Accordingly, it is not required that it be stamped / signed.
	<p><i>b. The report will be peer reviewed at the applicant's expense. The Town will work with the Region, Credit Valley Conservation and Niagara Escarpment Commission to draft a terms of reference for a peerreview which can be leveraged by all agencies.</i></p>	<p>Since it is not part of the application requirements, we question the need for the report to be peer reviewed. The site is within an identified aggregate area, and the report content is for informational purposes only.</p>
(13)	<p>1. The following comments apply to the <b><u>Hydrological Assessment</u></b>, prepared by Groundwater ScienceCorp., dated October 2017, and are to be addressed prior to the Town initiating a peer review of thereport:</p> <p>a. Please amend the report to address all policies and criteria contained in Section 5.11 of the Town's Official Plan, and more specifically, Section 5.11.2.4.15. The report does not adequatelyaddress/discuss the requirements of this section. Please include an analysis of this section in the report.</p>	<p>The noted sections are discussed in Section 1.2.2 of the Hydrogeological Assessment, and form the basis for the report. Section 5.11 of the OP is further discussed in Section 10 and Appendix D of the MHBC PJR.</p>
	<p>b. Please refer to the Region of Peel's comments dated January 30, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. Region of Peel comments to be responded to in separate correspondence.</p>
	<p>c. Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. NEC comments to be responded to in separate correspondence.</p>
	<p>d. Please refer to the CVC's comments dated March 8, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. CVC comments to be responded to in separate correspondence.</p>
	<p>e. The report will be peer reviewed at the applicant's expense. The Town will work with the Region, Credit Valley Conservation and Niagara Escarpment Commission to draft a terms of reference for a peerreview which can be leveraged by all agencies.</p> <p>(Town of Caledon, Community Services, Planning and Engineering, Niagara Escarpment Commission, Credit Valley Conservation and Region of Peel)</p>	<p>Noted. Comments will be reviewed and applicable responses provided when available.</p>

No.	Comment	Response
(14)	The following comments apply to the <b>Natural Environment Technical Report</b> , prepared by Savanta, dated September 2017:	<i>(Savanta response letter included as Attachment B)</i>
	a. Please refer to the Region of Peel's comments dated January 30, 2019 (attached) for further comments to be addressed.	Noted. Region of Peel comments to be responded to in separate correspondence.
	b. Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.	Noted. NEC comments to be responded to in separate correspondence.
	c. In accordance with the Town's Official Plan, and more specifically, Section 5.11.12.4.17, please provide a policy review/analysis of Sections 5.11.2.4.17, 5.7.3.7.2 and 5.7.3.7.6.	Please refer to Section 9 and Appendix D of the MHBC PJR for discussion of natural environment policies. Of note, Section 5.11.2.4.17 references the need for a CBSSES, which is not required for this application (SWS already completed).
	d. As technical advisors to the Town, the Town will rely on the expertise and comments of the Credit Valley Conservation. Please refer to the CVC's comments dated March 8, 2019 (attached) for further comments to be addressed.	Noted. CVC comments to be responded to in separate correspondence.
	e. Town of Caledon, Planning staff support the comments provided by the three external agencies (noted above), and note that the determination of whether the woodlands are considered Core Woodlands is critical prior to a revised submission. As the studies/material submitted identify that the woodlands are not Core Woodlands, if a determination is made that the woodlands are Core Woodlands, the proposed aggregate use and associated development will be impacted. Section 5.11.2.2.5 of the Town's Official Plan identifies areas where new or expanded mineral aggregate extraction is prohibited.	Discussions have been ongoing regarding woodland significance on the site. MNRF staff have now provided a letter of advice indicating woodland significance will be determined based on the Peel Official Plan criteria (see Attachment B), which is 30 ha for aggregate applications. The woodlands onsite are less than 30 ha.
	f. Habitats of Threatened and Endangered Species are defined as "Nature Core Areas" of the Ecosystem Framework and by definition designated as "Environmental Policy Area" (EPA) within the Town's Official Plan. Section 3.2.5.9.1 states that new development within Habitat of Threatened and Endangered Species is prohibited, except as specified in Section 5.7.3.1.2 of the Official Plan, or as may be permitted in accordance with provincial and federal legislation and policies (e.g. Endangered Species Act). The subject application proposes to remove habitat. Policy 5.7.3.1.2, permits "limited extractive industrial" uses within EPA lands. It is important to note that at this time,	The proposed development is to occur in accordance with ESA guidance, and permits will be obtained as necessary. Consultation is ongoing with MECP staff. This matter is discussed in the MHBC PJR (Section 9), and also the Savanta report.

No.	Comment	Response
	<p>any removals of a Habitat of Threatened and Endangered Species under the Endangered Species Act requires approval from the Province. Please provide additional commentary.</p>	
	<p><b>g.</b> Significant Wildlife Habitat is also a “Natural Core Area” and by definition designated as Environmental Policy Area. Development within a Significant Wildlife Habitat is prohibited, with the exception of uses as specified in Policy 5.7.3.1.2 of the Official Plan (i.e. Limited Extractive Industrial uses are permitted). Policy 5.11.2.2.6 g), related to mineral aggregate operations within and adjacent to Significant Wildlife Habitat also applies. This policy states that mineral aggregate operations may be permitted within and adjacent to Significant Wildlife Habitat, provided that several criteria are satisfied. Please provide additional commentary on this.</p> <p>(Town of Caledon, Community Services, Planning and Engineering, Niagara Escarpment Commission, Credit Valley Conservation and Region of Peel)</p>	<p>This matter is discussed in the MHBC PJR (Section 9), and also the Savanta report. For clarity, the Savanta response letter has been updated to clarify the policy criteria are satisfied, and site rehabilitation will ensure there are no negative impacts to significant wildlife habitat.</p>
(15)	<p>The following comments apply to the <b>Noise Report</b>, prepared by Aercoustics, dated November 13, 2017, and are to be addressed prior to the Town initiating a peer review of the report:</p> <p><b>a.</b> The report indicates that Residence R5 can be classified as Class 2 due to its proximity to Heart Lake Road however, the report does not provide any modelling to confirm if this is the case. The consultant is to contact the Town’s Transportation Division for the AADT for the section of Heart Lake Road between Charleston Sideroad and Escarpment Sideroad. Modelling calculations are to be included in the report.</p>	<p>(Aercoustics response letter included as <u>Attachment C</u>)</p> <p>The classification of receptors is based on background noise levels in the area, and as a result the receptor is Class 2.</p>
	<p><b>b.</b> The report indicates that Residence R14 can be classified as Class 2 due to its proximity to the exiting extraction operation, however the report does not provide current sound levels at this location to support this. Additionally, the report indicates that the predicted levels at R14 will be 43 dBA but does not indicate if this value takes into account the noise produced by the existing pit.</p>	<p>Similar to above, the classification is based on background noise levels. In this case, noise is primarily from the existing gravel pit and road. If both pits were operating at same time, would result in 3 dba increase, which is perceived as minor.</p>
	<p><b>c.</b> The report is to include berm heights and proposed elevations for the berms along the east, north and south property lines.</p>	<p>Berm heights are provided in the Aercoustics report as part of Appendix A.</p>
	<p><b>d.</b> Provide a description for Figure 3, 4 and 5 in Appendix B.</p>	<p>The figures in question show predicted noise contours and daytime levels for different operational phases.</p>



No.	Comment	Response
	<p>e. <i>The report will be peer reviewed at the applicant's expense. The Town will work with the Region, Credit Valley Conservation and Niagara Escarpment Commission to draft a terms of reference for a peerreview which can be leveraged by all agencies.</i> <i>(Town of Caledon, Community Services, Planning and Engineering)</i></p>	<p>Noted. Comments to be reviewed when made available and responses provided.</p>
(16)	<p>The following comments apply to the <b><u>Planning Justification Report</u></b> prepared by MHBC, dated November 2017:</p>	
	<p>a. <i>Please refer to the Region of Peel's comments dated January 30, 2019 (attached) for further comments to be addressed.</i></p>	<p>Noted. Region of Peel comments to be responded to in separate correspondence.</p>
	<p>b. <i>Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.</i></p>	<p>Noted. NEC comments to be responded to in separate correspondence.</p>
	<p>c. <i>In accordance with the Town's Official Plan, and more specifically, Section 5.11.12.4.17, please provide a policy review/analysis of Sections 5.11.2.4.17, 5.7.3.7.2 and 5.7.3.7.6.</i></p>	<p>The MHBC PJR includes a comprehensive analysis of OP requirements, as well as 5.11.2.4.17. A sub-watershed study is already completed for this area, so a CBSES is not required or requested.</p>
	<p>d. <i>As technical advisors to the Town, the Town will rely on the expertise and comments of the Credit Valley Conservation. Please refer to the CVC's comments dated March 8, 2019 (attached) for further comments to be addressed.</i></p>	<p>Noted. CVC comments to be responded to in separate correspondence.</p>
	<p>e. <i>The Planning Justification Report will require updates resulting from updates to the supporting material/reports to address comments contained in this letter.</i></p>	<p>Noted. To date, revisions are not required but can be provided in the future through an addendum if needed.</p>
	<p>f. <i>Please add discussion on the following policies in the PPS: 1.1.1, 1.1.4, 1.1.5, and 2.3.6.</i></p>	<p>Comprehensive PPS analysis is included in MHBC PJR and other reporting materials.</p>
	<p>g. <i>Please add discussion on the following policies in the Town's Official Plan: 3.2, 3.3, 5.2 and 5.7.</i></p>	<p>The applicable reports address these policy areas of the Town Official Plan, by addressing the requirements of Section 5.11.</p>
	<p>h. <i>Significant Wildlife Habitat is also a "Natural Core Area" and by definition designated as Environmental Policy Area. Development within a Significant Wildlife Habitat is prohibited, with the exception of uses as specified in Policy 5.7.3.1.2 of the Official Plan (i.e. Limited Extractive Industrial</i></p>	<p>See above response related to Savanta comments.</p>



No.	Comment	Response
	<p><i>uses are permitted). Policy 5.11.2.2.6 g), related to mineral aggregate operations within and adjacent to Significant Wildlife Habitat also applies. This policy states that mineral aggregate operations may be permitted within and adjacent to Significant Wildlife Habitat, provided that several criteria are satisfied. Please provide additional commentary on this.</i></p>	
	<p><i>i. Habitats of Threatened and Endangered Species are defined as “Nature Core Areas” of the Ecosystem Framework and by definition designated as “Environmental Policy Area” (EPA) within the Town’s Official Plan. Section 3.2.5.9.1 states that new development within Habitat of Threatened and Endangered Species is prohibited, except as specified in Section 5.7.3.1.2 of the Official Plan, or as may be permitted in accordance with provincial and federal legislation and policies (e.g. Endangered Species Act). The subject application proposes to remove habitat. Policy 5.7.3.1.2, permits “limited extractive industrial” uses within EPA lands. It is important to note that at this time, any removals of a Habitat of Threatened and Endangered Species under the Endangered Species Act requires approval from the Province. Please provide additional commentary.</i></p>	<p>See above response related to Savanta comments.</p>
	<p><i>j. Guidance for the interpretation of Sections 3.2 and 5.7 of the Town’s Official Plan in the context of mineral aggregate operations is provided in Section 5.11.2.9.10 and 5.11.2.9.11. Specifically, the terms “protect” and “maintain” shall be interpreted to allow a consideration of change to ecological functions and attributes, subject to a demonstration of no negative impacts. For new and expanded mineral aggregate operations, “negative impacts” shall mean (Section 5.11.2.9.11):</i></p> <ul style="list-style-type: none"> <li><i>i. Any loss of area of Core Area of the Greenlands System in Peel. Any loss of area of Environmental Policy Area, except otherwise permitted by the Official Plan;</i></li> <li><i>ii. Any loss of significant ecological functions or attributes within a Core Area of the Greenlands System in Peel or Environmental Policy Area; and,</i></li> <li><i>iii. Allows a consideration of change to ecological functions and attributes within a Core Area of the Greenlands System in Peel or Environmental Policy Area, subject to subsections a) to b).</i></li> </ul> <p><i>(Town of Caledon, Community Services, Planning, Niagara Escarpment Commission, Credit Valley Conservation and Region of Peel)</i></p>	<p>These matters are addressed in Appendix D of the MHBC PJR, and also discussed in the Savanta work.</p>

No.	Comment	Response
(17)	<p>The following comments apply to the <b><u>draft Official Plan Amendment</u></b> dated 2010:</p> <p>a. Please amend the signatories to reflect the current Mayor and Clerk.</p>	The revised OPA includes the updated information.
	<p>b. Please amend the draft OPA to reflect the amended proposal, include a brief conformity discussion on the PPS, Niagara Escarpment Plan and Region of Peel Official Plan. <i>(Town of Caledon, Community Services, Planning, Niagara Escarpment Commission, Credit Valley Conservation and Region of Peel)</i></p>	The revised OPA includes the updated information.
(18)	<p>The following comments apply to the <b><u>Traffic Impact Study</u></b>, prepared by The Municipal Infrastructure Group Ltd., dated October 2017:</p>	<i>(TMIG response package included as <u>Attachment D</u>)</i>
	<p>a. Please amend the Traffic Impact Study to review the sightlines at the Kennedy Road entrance to ensure that they meet the requirements as per TAC guidelines.</p>	A sight line analysis was completed by TMIG, and is attached with this letter.
	<p>b. Please amend the report to address all policies and criteria contained in Section 5.11 of the Town's Official Plan, and more specifically, Section 5.11.2.4.14. The report does not adequately address/discuss the requirements of this section. Please include an analysis of this section in the report.</p>	Further discussion of Official Plan requirements has been included by TMIG. Traffic impact is also discussed in the MHBC PJR (Section 11 and Appendix D).
	<p>c. The report is to be stamped and signed by the author. <i>(Town of Caledon, Community Services, Planning and Engineering and Finance and Infrastructure Services, Transportation)</i></p>	The response document has been duly signed and stamped as requested.
(19)	<p>The following comments apply to the <b><u>Visual Impact Assessment Report</u></b> prepared by Harrington McAvan Ltd., dated January 2018, and are to be addressed prior to the Town initiating a peer review of the report:</p>	
	<p>a. Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.</p>	Noted. An updated VIA is being prepared, reflecting comments received to date.
	<p>b. Urban Design staff has significant concerns surrounding the Visual Impact Assessment (VIA). Having reviewed the comments from the Niagara Escarpment Commission (NEC), Urban Design staff concur with the NEC and supports the comments raised in their letter. Further to their comments, please note that Urban Design staff has the additional following comments:</p> <p>i. Please provide a reference to the Town's Official Plan</p>	<p>The Visual Impact Assessment is currently being updated by Harrington McAvan and will be provided to Town staff for review later in fall.</p> <p>Applicable Town of Caledon Official Plan references have</p>

No.	Comment	Response
	<p><i>and associated policies that reference the requirements of the VIA.</i></p> <p><i>ii. There are concerns surrounding the view sheds represented by the photographs, their location and the lack of appropriate post-development images that show the reality of the final excavation in the landscape.</i></p> <p><i>iii. Please provide the Terms of Reference used in the development of the VIA.</i></p> <p><i>iv. Due to the size of the site, there needs to be a greater number of images that show the development of the pit from before to during and after including appropriate mitigation through berms, planting and the retention of relevant woodlots.</i></p> <p><i>v. The VIA talks to the final pit rehabilitation being reinstated and unobstructed but this would require the pit to be re-filled and the hillocks returned to their original elevations, something that is not shown in the VIA. Instead there would be a large hole in the landscape with very little vegetative planting resulting in a major change to the surrounding landform. A more supportive rehabilitation plan is required as part of the pit's mitigation.</i></p> <p><i>vi. Provide sections through the pit that show the depth of excavation in relation to the surrounding environment that do not include the infiltration of the water table.</i></p>	<p>been included and discussed in the MHBC PJR, and will also be added to the updated VIA.</p> <p>Updated view shed renders are being prepared.</p> <p>The final Terms of Reference is included as <u>Attachment E</u> for reference.</p> <p>As noted, the report is being updated to include additional images.</p> <p>Additional rehabilitation details are being provided in the updated VIA report.</p> <p>Cross-sections can be found as part of the ARA Site Plans and also within the VIA report.</p>
	<p><i>c. The report will be peer reviewed at the applicant's expense. The Town will work with the Region, Credit Valley Conservation and Niagara Escarpment Commission to draft a terms of reference for a peer review which can be leveraged by all agencies.</i></p> <p><i>(Town of Caledon, Community Services, Planning and Urban Design and Niagara Escarpment Commission)</i></p>	<p>Noted. Comments to be reviewed when made available and responses provided.</p>
(20)	<p><i>The following comments apply to the <b>Site Plans</b>, prepared by Harrington McAvan Ltd., dated March 8, 2018:</i></p>	
	<p><i>a. The proposed berm heights are conflicting in the supporting documents. Please confirm the proposed height and ensure that all documents are revised to show consistent information.</i></p>	<p>The revisions to the Arcadis report reflect the current ARA Site Plans</p>
	<p><i>b. Please provide a planting buffer on all proposed berms comprised of native caliper stock deciduous trees, coniferous trees and shrubs with increased density adjacent to any existing residences.</i></p>	<p>Supplemental planting plans can be developed as required through the VIA, and referenced / included on the final ARA Site Plans as applicable.</p>

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	<p><b>c.</b> Please refer to the Region of Peel's comments dated January 30, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. Region of Peel comments to be responded to separately.</p>
	<p><b>d.</b> Cash-in-lieu of Parkland is required to be paid in accordance with the Town's Cash-in-Lieu of Parkland By-law.</p>	<p>Do not agree. This matter is not required for an aggregate applications, as no site plan application is necessary.</p>
	<p><b>e.</b> Please provide detailed landscape plans with cost estimate.</p>	<p>Detailed planting plans will be prepared if necessary and referenced / included on the ARA Site Plans accordingly. Cost estimates are not required for an aggregate application, as there is no formal <i>Planning Act</i> site plan process.</p>
	<p><b>f.</b> Please add a note to prohibit extraction within the "Excavation Setbacks" from all lotlines.</p>	<p>No extraction is proposed or permitted within the required setbacks, per the Provincial Standards associated with aggregate extraction.</p>
	<p><b>g.</b> Please refer to the Region of Peel's comments dated January 30<sup>th</sup>, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. Region of Peel comments to be responded to separately.</p>
	<p><b>h.</b> Please refer to the NEC's comments dated January 31, 2019 (attached) for further comments to be addressed.</p>	<p>Noted. NEC comments to be responded to separately.</p>
	<p><b>i.</b> As technical advisors to the Town, the Town will rely on the expertise and comments of the Credit Valley Conservation. Please refer to the CVC's comments dated March 8, 2019 (attached) for further comments to be addressed.  (Town of Caledon, Community Services, Open Space Design and Planning, Region of Peel, Credit Valley Conservation and Niagara Escarpment Commission)</p>	<p>Noted. CVC comments to be responded to separately.</p>
(21)	<p>The following agencies and departments have no concerns:</p> <ul style="list-style-type: none"> <li>• Enbridge Gas Inc. (see attached comments dated December 5, 2018)</li> <li>• Hydro One</li> <li>• Ontario Provincial Police – Caledon Detachment</li> <li>• Town of Caledon, Community Services, Fire and Emergency Services</li> <li>• Town of Caledon, Community Services, Zoning</li> </ul>	<p>Noted, thank you.</p>
(22)	<p>Comments from the following agencies and departments remain outstanding and will be forwarded once they are received:</p> <ul style="list-style-type: none"> <li>• Bell Canada</li> </ul>	<p>Noted, thank you.</p>

No.	Comment	Response
	<ul style="list-style-type: none"> <li>• Ministry of Transportation (Permitting)</li> <li>• Rogers Communications</li> <li>• Town of Caledon, Community Services, Policy and Sustainability</li> </ul>	

Detailed responses to noise assessment, traffic impacts, and natural environment have been included with this information package in order to provide a more comprehensive response to some of the topics. A revised Air Quality Assessment has also be attached for review. Further, the Terms of Reference for the VIA has been included, as well as the recent MNRF letter of advice related to wooded areas on the subject lands.

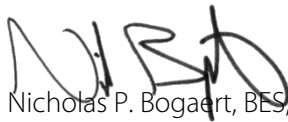
**Closing**

We trust the above and attached respond to the most recent comments from Town of Caledon review of the application materials. We look forward to continuing to work with Town and agency staff regarding this proposal as review progresses.

Should you have any questions, require hard copies, or wish to discuss this response further, please do not hesitate to contact MHBC or Escher Planning.

Yours truly,

**MHBC**



Nicholas P. Bogaert, BES, MCIP, RPP, CAHP  
Associate



James D. Parkin, BES, MCIP, RPP  
Partner

cc. Melanie Horton, Escher Planning Inc.