



**Brookvalley Project Management Inc. - Mayfield West Phase 2 – Stage 3**  
**Official Plan Amendment Application**  
**File Number: POPA 2023-0006**  
**Response to Town and Agency Comments**  
**1<sup>st</sup> Re-submission**



**Last Updated: June 7, 2024**

**Town of Caledon – Regional Municipality of York Comments – TRCA – Other Agencies – Peer Review**

#	Comment	Consultant	Response
<b>Town of Caledon - Development Planning and Urban Design</b>			
Elizabeth Howson February 9, 2024			
<b>Development Planning and Urban Design</b>			
<u>Planning Opinion Report and Urban Design Brief</u>			
1.	<p>The proposed Phase 2, Stage 3 lands are part of the 2051 New Urban Areas within the Region’s Official Plan and therefore are subject to the policies found within Section 5.6.20.14 and 5.6.20.14.21. As such, the following studies and plans are required to be provided with the second submission:</p> <ul style="list-style-type: none"> <li>• Housing Assessment, including affordable housing policies</li> <li>• Local Subwatershed study, or equivalent (See Development Services comments below and TRCA comments attached)</li> <li>• Community Energy and Emissions Reduction Plan (See also Comment 8 below)</li> <li>• Climate Change Adaptation Plan</li> </ul> <p>The following studies would also be required, however can be deferred until after adoption of the official plan amendment (POPA), provided it is agreed that appropriate policy language will be added to POPA:</p> <ul style="list-style-type: none"> <li>• Staging and Sequencing Plan</li> <li>• Framework Plan or Tertiary Plan that identifies complete road network, stormwater management facilities, parks, schools, heritage, natural heritage, land specific uses, transit and commercial lands.</li> </ul>	Owner/MGP	<p>The Housing Assessment is included in the Planning Opinion Report Addendum letter provided in this submission.</p> <p>A Gap Analysis for the Subwatershed Study and a Scoped DSSP is included in this submission.</p> <p>It is our opinion that the Community Energy and Emissions Reduction Plan should not be required as there is no community energy facilities planned for this development. Instead should be strongly encouraged, through policies in the OPA, that energy conservation and Distributed Energy Resources be implemented at the building level.</p> <p>As discussed at the charette meeting, the Climate Change Adaptation Plan is addressed through the FSR or equivalent study.</p>
2.	Please provide a separate planning justification letter/addendum demonstrating conformance with the above noted Region’s Official Plan policies to address a request from the Region.	MGP	A Planning Opinion Report Addendum has been prepared and is included in this submission.
3.	As part of the second submission, please provide an addendum to the approved Community Design Guidelines for the Mayfield West Phase 2 Secondary Plan. This approach, rather than the approach in the Urban Design Brief, keeps the same design structure as the existing Mayfield West Community allowing clarity with respect to how this area fits into the broader design layout of the Mayfield West Community.	NAK	Provided.
<u>Land Use Plan and Design Considerations</u>			
4.	Staff have identified multiple differences between the Urban Structure Plan and Land Use Schedule which they would like to better understand. To assist in this process, Town staff would also like, prior to a revised submission, to have a working meeting/design charrette organized for staff and representatives from key commenting agencies such as the school boards, to collaborate on the vision, values and ideas for the community. Town staff will contact the Applicant’s planning consultant to coordinate a date and time for this charrette.	Owner/MGP	Acknowledged. A charette meeting was held on March 4, 2024 with Town staff and other agencies to discuss comments on the OPA.
5.	<p>The working meeting/charette is proposed to allow for consideration of matters such as the following:</p> <ul style="list-style-type: none"> <li>• Staff are supportive of medium density along the collector roads and at main intersections such as Hurontario Street and Old School Road</li> <li>• Unclear why the Urban Structure Plan shows the land use of areas outside of the plan area (east side of Hurontario Street)</li> <li>• Would like to understand location, functionality/configuration of commercial lands. How such services can be located to contribute to providing convenient commercial services for the community. There is also a concern that</li> </ul>	Owner/MGP	Matters noted below were considered at the charette meeting held on March 4, 2024, please refer to the minutes of the meeting for the consideration of each of the matters.

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	<p>commercial facilities should be located centrally to assist in, and contribute to, the creation of a central community node and provide a commercial destination along the trailway and close to proposed schools.</p> <ul style="list-style-type: none"> <li>• How to recognize the Highway 413 extension and related study area in the plan, to ensure land uses are appropriately planned around the highway (See comments from Ministry of Municipal Affairs and Housing below.</li> <li>• Park distribution (See comment Parks comments below)</li> <li>• Potential to locate higher density land uses surrounding parks to allow more people to be closer to outdoor amenity spaces</li> </ul>		
<b>Peer Review of Studies</b>			
6.	The Town will require the peer review of the submitted Agricultural Impact Assessment and Financial Impact Study, at the applicant's expense. Once peer reviewers have been secured, staff will connect to secure the costs.	Owner	Acknowledged. We've paid the FIS peer review study fee and comments are included and addressed in this matrix. As confirmed by Town staff via email correspondence on March 27, 2024, the Region will be conducting the review of the AIA. Comments have not been provided at time of resubmission.
<b>Energy and Environment</b>			
7.	A Community Energy Plan and Climate Change Adaptation Plan will be required in support of new secondary plan areas to promote energy efficient, low carbon and climate resilient community design. Energy and Environment staff request a meeting to discuss high level objectives and Terms of Reference for these plans.	Owner/MGP	It is our opinion that the Community Energy and Emissions Reduction Plan should not be required as there is no community energy facilities planned for this development. Instead should be strongly encouraged, through policies in the OPA, that energy conservation and Distributed Energy Resources be implemented at the building level.
<b>Parks</b>			
8.	Due to changes in the Planning Act, the Town is only able to require parkland dedication at a reduced rate of 1ha/600 units. This change results in a decrease in parkland dedication, from 13.8 ha calculated in the Planning Opinion Report, dated July 2022. As such, the alternative rate of 5% of Development Area (189 ha) will be used for the low density blocks and 1/600 units will be used for the medium density blocks. This blended method generates approximately 11.5 ha.	Owner/MGP	In accordance with the Planning Act, parkland dedication is calculated at 5% for all residential areas and 2% for all commercial areas. Based on the revised Land Use Plan, the total amount of parkland required is estimated at 9.5 ha.
9.	Town staff recommend splitting this 11.5 ha of parkland dedication between Neighbourhood and Community Parks as follows: <ul style="list-style-type: none"> <li>• 5 Neighbourhood Parks – approximately 1 ha each</li> <li>• 1 Community Park – 6 ha</li> </ul>	Owner/MGP	Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act.
<b>Neighbourhood Parks</b>			
10.	Neighbourhood Parks need to be sized between 1 ha and 2 ha. Town staff recommend 5 NP within the Secondary Plan with a Service Radius of 400 metres. Please site Neighbourhood Parks according to the following design principles: <ul style="list-style-type: none"> <li>• Minimum 2 street frontages, located on local or collector road</li> <li>• Centrally located within identified neighbourhood</li> <li>• Separated from school blocks</li> </ul>	Owner/MGP	Neighbourhood parks are generally sized as 1ha. Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act.
<b>Potential Facilities</b>			
11.	Recommended locations for the 5 Neighbourhood Park locations as a basis for discussion at the above noted working meeting/charrette are found on the marked-up draft Secondary Plan below.	Owner/MGP	Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act.

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12.	<p>A combination of the following park facilities and amenities will be provided in Neighbourhood Parks.</p> <ul style="list-style-type: none"> <li>• Playground</li> <li>• Seating Area with shade structure</li> <li>• Courts (basketball, pickleball courts)</li> <li>• Amenities (bike racks, benches, trees, signage, garbage receptacles)</li> <li>• Outdoor fitness stations</li> <li>• Free play areas</li> </ul>	Owner/MGP	Acknowledged. Park facilities and amenities will be determined through the development approvals process.
<b>Community Parks</b>			
13.	Community Parks need to be sized between 4 ha and 10 ha. For this Secondary Plan, Town staff recommend one (1) 5 ha CP within the Secondary Plan with a Service Radius of 1000 metres.	Owner/MGP	Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act. As noted in the planning addendum, a park is identified in the portions of the Greenbelt Plan, which can be permitted as a non-agricultural use given the agricultural impact study that supports the rural use of these lands.
14.	<p>Please site Neighbourhood Parks according to the following design principles:</p> <ul style="list-style-type: none"> <li>• Minimum 2 street frontages, located on arterial or collector road</li> <li>• Centrally located within identified community</li> <li>• Regular shaped block that maximizes park programming</li> <li>• Separated from school blocks</li> </ul>	Owner/MGP	Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act.
15.	Specific comments on the Community Park location are found on the marked-up draft Secondary Plan below. In particular, Town staff are recommending for discussion at the working meeting/charrette increasing the proposed Community Park to 6 ha and reconfiguration of the block to straddle the old Orangeville Rail Line with the potential to extend to McLaughlin Road. Please note the land within the Orangeville Rail Line would not form part of the parkland dedication.	MGP	Based on discussions at the charette meeting, the park size and locations have been revised to deliver the appropriate amount of parkland required by the Planning Act. A centralized park is denoted with a park symbol central to the plan between McLaughlin Road and the trail. This location maximizes access for all new residents of Mayfield 2-3. The size of this park will be determined through the Draft Plan of Subdivision process.
<b>Potential Facilities</b>			
16.	<p>A combination of the following park facilities and amenities would be provided in Community Park.</p> <ul style="list-style-type: none"> <li>• Splash Pad/Misting Station</li> <li>• Courts (basketball, pickleball courts)</li> <li>• Sport Fields</li> <li>• Soccer (micro)</li> <li>• Cricket (one field)</li> <li>• Large playground</li> <li>• Washroom Building</li> <li>• Shade structure and seating area</li> <li>• Amenities (parking lot, bike racks, water fountain, benches, trees, signage, interpretive signs, garbage receptacles)</li> <li>• Community Gardens</li> <li>• Dog Park</li> <li>• Outdoor fitness stations</li> <li>• Skateboard Park/Pump Track</li> </ul>	Owner/MGP	Acknowledged. Park facilities and amenities will be determined through the development approvals process.

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	<ul style="list-style-type: none"> <li>• Ice rinks or skating loop</li> <li>• Free play areas</li> <li>• Picnic Areas</li> </ul>		
17.	<p>Proposed Park Plan for Brookvalley for review and discussion as part of working meeting/charrette:</p> <p>  </p> 	Owner/MGP	Acknowledged and discussed at the charette meeting on March 4, 2024.
<b>Development Services</b>			
18.	<p>In accordance with the Region of Peel Official Plan Policy 5.6.20.14.17.f., a Local Subwatershed Study (or an equivalent study) is required to support a Secondary Plan within the Settlement Area Boundary Expansion area. The Town has worked with the Region and TRCA to develop an approved Local Subwatershed Study Terms of Reference and by way of an attachment accompanies these comments (Attachment A). The Local Subwatershed Study Terms of Reference can be scoped if the applicant can demonstrate, to the satisfaction of the Town, the Region and TRCA, that the study component is not applicable.</p>	Palmer/Candev con	Based on the SWS ToR, the project team has completed a Comprehensive Environmental Impact Study and Management Plan (CEISMP) report for the MW2-3 Lands as an equivalent study that builds upon the results of the recently completed Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022). At the request of Peel Region staff, a Gap Analysis Assessment has also been completed that outlines each of the components of the ToR and how they have been addressed in the reporting provided.
19.	<p>The proposed Secondary Plan entirely lies within the headwaters of the Etobicoke Creek Watershed. The limits of the study area should ensure that the Local Subwatershed Study (or an equivalent study) adequately characterizes the location, extent, sensitivity and significance of the water resource system and natural heritage system form and functions within and across the Secondary Plan area and evaluates the factors and influences that are important to their sustainability. The applicant should note that the limits of study should be defined to support the implementation of the Settlement Area Boundary Expansion Scoped Subwatershed Study (Wood et. Al., December 2021). As a minimum, the Study area limits are defined as the Secondary Plan subject lands, 120 metre area around the perimeter of the subject lands, and the surface water drainage catchments that drain to and through the subject lands.</p>	Palmer/Candev con	Acknowledged
20.	<p>The lands being proposed for development through a Secondary Plan are considered the Primary Study Area (PSA) and the area beyond the Primary Study Area within the subwatershed study limits is considered the Secondary Study Area (SSA). The Local Subwatershed Study (or equivalent study) is typically more detailed and supported by field investigations and collected data within the Primary Study Area. The Local Subwatershed Study (or equivalent study) can primarily be supported by desktop information and more limited field work within the Secondary Study Area. The broader</p>	Palmer/Candev con	Acknowledged

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	watershed/subwatersheds may have existing downstream constraints beyond the identified Secondary Plan study area and, to the appropriate extent, these will have to be considered in establishing the management strategies based on the overall study objectives and ultimate targets.		
21.	The consultant is to justify the runoff coefficients utilized in Table 10 and table 11 of the Hydrogeological Assessments as there appears to be discrepancies between the two tables and some of the values seem high. For example, Agricultural is 0.65, which is the same coefficient used for commercial and residential, and Roads have different coefficients between pre and post development. Town Standard Drawing # 103 identifies runoff coefficients that should be used. Additionally, the report identifies a decrease in infiltration of 35,954 m3/yr post development for 430 Ha. This value seems low considering a neighboring development has an infiltration deficit of roughly 60,000 m3/yr for 100 Ha. This may be reflective of the coefficients selected for the analysis.	Palmer	The runoff coefficients and infiltration deficit have been updated as part of the CEISMP and subsequent Hydrogeology reporting for the Draft Plan Application. The revised infiltration deficit is 237,182 m3/yr or a 30% pre- to post-development change. This is consistent with your example of 60,000 m3/yr over an area of 100 Ha.
22.	Stormwater management facilities proposed with drainage areas under 5 ha should not utilize a conventional stormwater management facility. Alternative techniques should be explored for these areas and discussed in the in the Local Subwatershed Study.	Candevcon	There are no SWM facilities proposed for areas less than 5 ha.
<b>Fire and Emergency Services</b>			
23.	The Community Risk Assessment indicates a significant gap in the delivery of an appropriate level of fire suppression services within this development area.	Owner	Fire protection will be provided as per Town and Region of Peel standards.
24.	The Community Risk Assessment indicates a significant gap in the delivery of an appropriate level of fire suppression services within Caledon’s Rural Service Centers. This gap will only increase with housing growth if fire suppression services are not accounted for in the design and approval of new developments and the expansion of the Rural Service Centers. Fire Services does not recommend increasing this risk until significant improvements are made in fire suppression deployment benchmarks to a level where 10 firefighters can respond within a 10-minute response time (turnout time + travel time) to 80% of the fire related incidents within the rural service center boundaries. Any areas approved for growth that are underserved by fire suppression services shall have sprinklered residential (houses) and commercial-use buildings until the level of service reaches this benchmark.	Owner	The housing proposed will be developed on the basis of full fire service, and is not proposed to have sprinklers. Improvements to the water pressure supply will be implemented to ensure sufficient pressurized fire hydrants. The inputs from the DSSP and OPA should serve as a basis for the Town updating its emergency response planning and providing sufficient resources to provide adequate fire protection as development proceeds.
25.	The 2023 amended Fire Station Location Study has identified land within this proposed area as an ideal location for a fire station to be staff by a minimum of 4 fulltime firefighter 24/7.	Owner	The proposed Official Plan Amendment permits fire stations throughout the 2-3 area. The preferred location of a fire station should be identified through the development application process.
26.	Pressurized Fire Hydrants must be provided, in accordance with Region of Peel Standards.	Owner/ Candevcon	Fire protection will be provided as per the region of Peel standards.
<b>Conclusion</b>			
27.	To assist you in the preparation of the next submission, Town staff will be in touch to arrange a working meeting/charrette regarding land use and urban design considerations and to develop Terms of Reference for the SSWS.	Owner/MGP	Acknowledged. Charette meeting was held on March 4, 2024.
28.	Partial resubmissions, which do not address all deficiencies listed in the letter, will generally not be accepted for processing. All comply with the Electronic Submission Standards:	Owner/MGP	Acknowledged.
29.	The Town is only accepting electronic submissions. To assist, the Town has created a document which identifies how material is to be submitted. Please click here to access the Town’s website for details and ensure that any submission material you are preparing will meet the attached requirements.	Owner/MGP	Acknowledged.
30.	To submit a revised submission, please visit the Town’s website and complete the additional information form online at <a href="http://www.caledon.ca/development">www.caledon.ca/development</a> , under the heading “For Existing Applications” and click on Official Plan Amendments. As the resubmission will be of a substantial file size, all supporting documents will be required to be uploaded to a secure Planning	Owner/MGP	Acknowledged.

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	FTP site. Should you not have access to the folder, please let Town staff (Tanjot Bal) know. Once a submission has been made as per above, please advise Town staff for efficient processing.		
<p><b>Town of Caledon - Transportation Engineering, Public Works, &amp; Transportation Department</b>                      Kavleen S. Younan, Transportation Engineer                      February 9, 2024</p>			
31.	<p>Town Transportation Staff are engaging with MTO staff in discussions on the proposed connection of Dougall Avenue to Hwy 10 at the Council's direction and the residents' request. Applicant to confirm the proposed roadway connections will not have negative impacts.</p> <p>a) Applicant to confirm that 'Street E' aligns with Dougal Avenue. The applicant should confirm the requirements to support this four-way intersection with the MTO.                      b) Applicant to confirm that 'Street H' meets MTO requirements such that the proposed Dougal Avenue connection to Highway 10 is not adversely impacted.                      c) Applicant to confirm the internal proposed intersections along Street E follow the MTO's requirements such that MTO approval for the future 4-way intersection with Highway 10 and Dougall Avenue is not adversely impacted.</p>	GHD	<p>As per the memorandum provided by the Town of Caledon's Transportation Engineering Public Works &amp; Transportation Department, dated February 2024, Town Transportation Staff are engaging with MTO staff in discussions on the proposed connection of Dougall Avenue to Highway 10 at the Council's direction and the residents' request. Street A at Hurontario Street is proposed to line up with Dougall Avenue and as a result, GHD modeled the intersection of Street A at Hurontario as a single signalized intersection. In addition, should Highway 413 alignment be moved as requested by the applicant, the location of Street A at Chinguacousy Road will be coordinated with the lands to the west (Alloa Landowners Group).</p> <p>The design of this road/intersection will be determined through the draft plan of the subdivision process, but initial analysis confirms the preliminary designs can meet MTO requirements.</p>
32.	Applicant to identify a defined internal collector road transportation network to accommodate all modes of transportation. This includes internal traffic controls and an active transportation network (along collector roadways, policies only on local roadways at this stage).	GHD	The collector road network and traffic controls are identified in the Traffic Impact Study and on the schedules to the OPA.
33.	<p>Applicant to provide a proposed Active Transportation Circulation Plan within the Transportation Study that includes the following items:</p> <p>a) <b>Boundary Connections:</b> Please develop a map that identifies all existing and planned pedestrian, cycling, trail, and community facilities (including current development applications) within the vicinity of the site (including along the boundary of the site) and demonstrate how the site will be connected to them through active transportation.</p> <p>b) <b>Internal Circulation:</b> The facilities roadway map should also include the proposed circulation for pedestrians, cyclists, and trails on the site, in accordance with the draft Active Transportation Master Plan:</p> <p>i. <b>Cycling Facilities:</b> The applicant should identify the location of all cycling facilities within road ROW's. Facility selection should be in accordance with the draft ATMP, MMTMP, and OTM Book 18.</p>	<p>GHD</p> <p>GHD</p> <p>GHD</p>	<p>The active transportation plan is provided in the Traffic Impact Study.</p> <p>An Active Transportation Plan has been included in the Draft Plan of Subdivision TIS. The Active Transportation Network will be coordinated with the Town's overall ATP which is expected to be endorsed on June 11, 2024.</p> <p>An Active Transportation Plan has been included in the Draft Plan of Subdivision TIS. The Active Transportation Network will be coordinated with the Town's overall ATP which is expected to be endorsed on June 11, 2024.</p>

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	<ul style="list-style-type: none"> <li>ii. Trails: The applicant should identify all trails. Facility locations should be in accordance with the network recommendations of the draft ATMP.</li> <li>iii. Pedestrian Walkways &amp; Crossings: The applicant must identify all pedestrian walkways and proposed crossings.</li> <li>iv. Additional Items: Any additional proposed pedestrian, cycling, and trail facilities or amenities should be identified in the Pedestrian and Cyclist Circulation Plan.</li> </ul>		
<b>Technical Comments: Transportation Study</b>			
34.	Section 1.1-For greater accuracy, the existing study horizon year and the full built-out horizon year should be updated to reflect the current date and proposed unit counts.	GHD	The horizon years have been updated.
35.	<p>Section 3.4– At the time of the study completion, pre-Covid TMCs were preferred by the Town. However, considering the evolving traffic congestion concerns within this area and the many changes since the pre-Covid TMCs, the Town requests the applicant to collect new traffic data which will address the following concerns:</p> <ul style="list-style-type: none"> <li>i. Connection of Queen Mary Drive to the boundary road network</li> <li>ii. The majority of the unaccounted-for development in Brampton (to be confirmed by the applicant in consultation with the City of Brampton)</li> <li>iii. The unconstructed units in Mayfield West 1 Stage 1 and 2 (approximately a quarter of the proposed development was unconstructed in 2018)</li> </ul>	GHD	Traffic turning movement counts were collected in February 2024, and baseline traffic volumes for 2024 are provided in the Traffic Impact Study.
36.	Section 4.2 - Please confirm the findings of the Chinguacousy Road EA impact the findings of this report. Specifically, please confirm when the signalization of Old School Road and Chinguacousy Road is warranted.	GHD	Confirmed.
37.	Section 4.4 - Background Developments		
38.	<ul style="list-style-type: none"> <li>i. Confirm with the City of Brampton if any background developments should be included.</li> </ul>	GHD	GHD reviewed the City’s development application portal and did not identify any additional background developments to include from the City of Brampton.
39.	<ul style="list-style-type: none"> <li>ii. Please confirm whether the GTA West Corridor project's impact on the projected volumes of the background developments for Mayfield West 2 Stages 1 and 2 was considered when establishing the background volumes.</li> </ul>	GHD	The background developments that provided site trips with and without the GTA West Corridor project were included in the TIS to establish future background volumes with and without the proposed highway.
40.	Clarify whether, based on the forecasted traffic volumes, the already proposed improvements on existing roadways (Chinguacousy Road and Mclaughlin Road) with the Mayfield West 2 Stages 1 and 2 collectors roads ( i.e. Tim Manley Avenue, Tweedhill Avenue, etc.) accommodate the additional traffic anticipated from Stage 3?	GHD	The intersections of Chinguacousy Road and Mclaughlin Road with Tim Manley Avenue, Tweedhill Avenue were not included as study intersections and cannot confirm if the Stage 3 lands would impact the operation of the intersections.
41.	Section 5.1 – Please confirm whether the proposed school trips have been included in the application or revise the information if necessary.	GHD	The updated trip generation included school trips, however it is anticipated that most students will live within the subject lands and would result in most trips generated by the school being diverted trips from the residential component. As a result, GHD assumed that the school would generate 20% of the trips estimated by the ITE trip generation.
42.	Section 5.2	GHD	<ul style="list-style-type: none"> <li>i. The trip distribution was based on the TTS data without specifying the type of trip being completed (i.e. home, school, work, leisure) and thus provided an overall trip distribution for all uses on the subject lands.</li> </ul>



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	<ul style="list-style-type: none"> <li>i. Prior studies for Mayfield West Stage 2 proposed different trip distributions for commercial and residential trips. In contrast, this study seems to have used the same distribution model for all types of generators. It is suggested that the rationale behind this decision be discussed and justified.</li> <li>ii. Town Transportation Engineering Staff recommend basing trip distributions on Caledon TTS data. Applicant should review 2006 GTA west zones and make necessary revisions.</li> </ul>		<ul style="list-style-type: none"> <li>ii. GHD used zones adjacent to the subject site that were built at the time of the 2016 TTS data collection to establish a trip distribution for trips to and from an area near the subject site rather than the entire Town of Caledon.</li> </ul>
43.	Section 6: Queuing reports appear to be missing for the unsignalized intersections in existing and future background conditions, as there are cases where the v/c ratio exceeds 1, and the operations are failing, yet no queue was reported. Applicant should review where the queues were stated to be 0 meters and revise as required.	GHD	Queuing reports were updated to review any queuing reported as 0 metres.
44.	<p>General:</p> <ul style="list-style-type: none"> <li>i. Applicant to summarize Transportation Demand Management measures, initiatives, and Parking policies to achieve the Town's future goals.</li> <li>ii. Applicant to reference Pedestrian and Cyclist Circulation plan.</li> </ul> <p>Applicant to identify other transportation infrastructure improvements and missing links for all modes of transportation required above and beyond those identified in the Region and Town Transportation Master Plans and construction programs to connect the proposed development to the existing active transportation facilities.</p> <ul style="list-style-type: none"> <li>iii. Applicant to confirm that the proposed collector roads are supportable by the relevant jurisdictions, including but not limited to corner clearance and anticipated sight distance. Corner clearances, as specified in TAC, are met for collector roadways within the Town's jurisdiction; for Roadways within the Regions and MTO Jurisdiction, please take note of the Peel Road Characterization study and the MTO Corridor Management Manual, respectively. Should justification be required, ideally, information would be included in the Transportation Study.</li> </ul>	GHD	Noted. TDM measures will be confirmed at the draft plan submission as will the detailed review of the collector roads once the road network has been further defined.
<b>Advisory Comments: Transportation Study</b>			
45.	Section 2.1 - Applicant should consult with the MTO regarding, but not limited to, the interchange with Highway 10 and Spine Road.	GHD	Noted. MTO was circulated the Terms of Reference.
46.	Section 3.4 – Traffic Volumes were not balanced; it would be preferred to discuss this in Methodology.	GHD	Traffic volumes at each intersection were based on their respective peak hours, providing traffic volumes for the “worst-case” scenarios. Volumes were not balanced in order to maintain the peak hour volumes.
47.	Section 3.2, Section 3.3 and Figure 3 - These sections differ from existing conditions. Should the report require revisions for other reasons, these sections should be updated to reflect current conditions.	GHD	Noted.
48.	Section 3.3 - Please be advised that a Go Transit route runs north-south on Highway 10.	GHD	The GO Transit bus route was added.
49.	Section 4.3 Separated figures for background growth volumes in the appendix would assist the review.	GHD	Background growth volumes have been appended.

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50.	Section 5.2 - It would be preferred for the applicant to discuss the logic and impacts of the trip assignment with the GTA west corridor. It is noted that approximately the same traffic was assigned to Chinguacousy Road with the GTA west corridor despite the proposed interchange.	GHD	The trip distribution assumptions with the GTA West were based on the applicant's preferred location of the GTA West Highway interchange at Hurontario Street.
51.	Appendix i. Synchro taper lengths appear to be 2.5 meters. ii. Please note that the signal timings in the Mayfield West 2 Stage 2 report may differ from the current signal timings, particularly regarding the All Red and Yellow Times, which may not be relevant based on the posted speed limit. It is recommended that the applicant confirms the signal timings with the Region of Peel and MTO for intersections within their respective jurisdictions.	GHD	i. Taper lengths were updated to the appropriate lengths ii. The signal timings were based on the field observations conducted at each study intersection based on existing conditions.
52.	Draft Official Plan Amendment: Town Transportation Staff recommend adding site-specific policies with the below considerations	GHD	
53.	a) Section 7.14.5.1.4; consideration should be given to add prohibitions to restrict residential accesses onto arterial and collector roadways to improve safety.	MGP	Policy language not revised as prohibiting access to arterial and collector roads will impact the entire MW2 area. For consistency, it is appropriate to minimize access onto arterial and collector roads to the great extent possible.
	b) Section 7.14.4.3.9 i. The applicant should consider the transition from railway to trail and modify this section. It is imperative that the project aligns with the community's current needs and contributes to the area's overall development.	MGP	Policy updated accordingly.
	ii. Was any consideration given to how the proposed development would impact future crossing treatment requirements of the proposed trailway? c) Section 7.14.15.4.2; while Town Transportation will work to support transit, Staff may request the applicant provide a high-level route(S).	MGP	Crossing treatments of the trail will be determined through the development approvals process. C) if staff requested a high level route for transit, GHD can provide at the Draft Plan submission stage.
<b>Town of Caledon - Heritage Comments</b> Sally Drummond, Senior Heritage Planner February 8, 2024			
<b>Cultural Heritage</b>			
<b>Cultural Heritage Assessment Report (CHA)</b> Please revise the Cultural Heritage Assessment report (CHA) (Wayne Morgan, October 2018, revised & updated July 2022) to address the following comments:			
54.	Revise Section 3.2 to reflect recent changes to the Ontario Heritage Act (OHA) and Ontario Regulation 9/06 resulting from Bill 23, which came into force and effect January 1, 2023.	MGP	All comments will be addressed through an updated CHA. The author of the report has retired and a new firm is being retained for the purpose of the Cultural Heritage Impact Assessment for the Draft Plan of Subdivision application. Given the nature of the comments is largely clarification and corrective, it is our opinion that the report can be updated and provided prior to the approval of the OPA and can be dealt with separately from the resubmission without negatively impacting the review. Where policy changes were identified, a response is provided below.
55.	Revise Section 3.5 to recognize the Region of Peel's new Official Plan, which is now in force and effect.	MGP	See response to Comment #54.
56.	Revise Section 5.0's references to censuses, and update any related property research in Appendix D, to recognize that 1931 federal census records are now available.	MGP	See response to Comment #54.

#	Comment	Consultant	Response
57.	Revise Section 6.1 to reflect Bill 23's changes to the Ontario Regulation 9/06 criteria and the new minimum criteria required for designation.	MGP	See response to Comment #54.
58.	Correct references to the listing of non-designated properties by 'by-law' to by Council resolution throughout report.	MGP	See response to Comment #54.
59.	In Section 7.2, revise reference to the demolition of the barn at 12760 Hurontario to note it was dismantled and salvaged for re-use in 2016, prior to removal from the Heritage Register.	MGP	See response to Comment #54.
60.	Revise Section 7.3 to note that, pursuant to Bill 23, listed non-designated properties will be automatically removed from the Heritage Register on January 1, 2025. Given this fact, reconsider the following report recommendations, and provide new, post-Bill 23 recommendations: <ul style="list-style-type: none"> <li>i. remove 2939 Old School Road from the Heritage Register;</li> <li>ii. list the former railway corridor on the Heritage Register; and,</li> <li>iii. continue listing all properties currently listed on the Town's Heritage Register.</li> </ul>	MGP	See response to Comment #54.
61.	Revise Section 7.4 to add a recommendation that when development applications are submitted to the Town, in addition to an HIA, the property owner should enter into agreements as necessary with the Town under Ontario Regulation 385/21, Sections 1.(2) and/or 2(1), to extend OHA timelines for the designation of heritage properties to facilitate the conservation of identified cultural heritage resources.	MGP	See response to Comment #54.
62.	Correct numbering of subsection 8.2 Recommendations to be 8.3 Recommendations.	MGP	See response to Comment #54.
63.	Revise Recommendations in Section 8 as per comments g. and h. above.	MGP	See response to Comment #54.
64.	Revise the summary of 12461 McLaughlin Road in Appendix D – Inventory of Cultural Heritage Properties and Resources to recognize that the built heritage resource on this property, known as the Giffen House, is located outside the boundary of the Mayfield West Phase 2 Stage 3 Secondary Plan and that conservation measures will be addressed through Plan of Subdivision application 21T-17008C 'Shannontown'.	MGP	See response to Comment #54.
65.	Revise Appendix E to reflect Bill 23's amendments to Ontario Regulation 9/06.	MGP	See response to Comment #54.
66.	The Owners of heritage properties in the subject lands are strongly encouraged to enter Designation Timeline Extension Agreements with the Town to allow for continued discussions regarding heritage conservation. Heritage staff would like to meet with the applicant and Lead Planner on file to discuss and explain the Designation Timeline Extension Agreements further.	MGP	See response to Comment #54.
<b>Stage 1 Archaeological Assessment Report</b>			
67.	Staff concur with the recommendations of the Stage 1 Archaeological Assessment Report (Historic Horizon, 2008), which are supported by the Town's 2021 Archaeological Management Plan.		Acknowledged.
<b>Draft Official Plan Amendment – Mayfield West Phase 2 Secondary Plan</b>			
68.	Add the following updated Cultural Heritage Conservation policies to the Phase 3 section of the Mayfield West Phase 2 Secondary Plan:		
<b>7.14.12.2 Archaeology</b>			
69.	<b>7.14.12.2.1</b> The MW2 Stage 1 Archaeological Assessment has determined that all lands in the Secondary Plan exhibit potential for archaeological resources. Complete archaeological assessment to the satisfaction of the Town and the Ministry of Citizenship and Multiculturalism (MCM) is required for all lands proposed for development in the Plan Area prior to any development approvals.	MGP	Acknowledged. Proposed policy language has been incorporated and revised appropriately.
<b>7.14.12.3 Built Heritage Resources and Cultural Heritage Landscapes</b>			

#	Comment	Consultant	Response
70.	<b>7.14.12.3.1</b> Preparation of a Heritage Impact Assessment (HIA), prepared in accordance with Official Plan policies and to the satisfaction of Heritage staff at the Town of Caledon, is required as part of any proposed development application or major site or building alteration on or adjacent to significant cultural heritage resources and/or cultural heritage resources designated under the Ontario Heritage Act, in accordance with Section 3.3.3.1.5 of this Plan. Any mitigative measures, as specified in the HIA and/or by Town of Caledon Heritage staff, will be undertaken to the satisfaction of Heritage staff at the Town.	MGP	Acknowledged. Proposed policy language has been incorporated.
<b>7.14.12.4 Integration of Cultural Heritage Resources</b>			
71.	<b>7.14.12.4.1</b> In evaluating development applications, the Town will require the conservation and integration of cultural heritage resources in accordance with Official Plan policies	MGP	Acknowledged. Proposed policy language has been incorporated and revised appropriately.
72.	<b>7.14.12.4.2</b> Conserving Caledon’s cultural heritage resources provides a sense of place and identity for the community, contributes to environmental sustainability, and ensures that the Town’s heritage and history is shared with future generations. The Town will require additional heritage conservation measures to achieve placemaking and contribute to the community’s identity including, but not limited to: <ul style="list-style-type: none"> <li>a. Acknowledgement of Indigenous presence on the land, past and present, using a variety of means including landscape design, public art and architecture, following meaningful engagement with Indigenous communities;</li> <li>b. The installation of interpretive plaques, public art and other forms of commemoration;</li> <li>c. The integration of cultural heritage landscape features into public parkland, public roadways or other public facilities where feasible; and,</li> <li>d. Commemoration of historic persons, families, and events in the naming of buildings, streets, parks and other public places.</li> <li>e. Incentives to encourage the retention of cultural heritage resources.</li> </ul>	MGP	Acknowledged. Proposed policy language has been incorporated.
73.	<b>7.14.12.4.3</b> Cultural heritage resources determined to meet the criteria for designation set out in O. Reg. 9/06 will be designated under the Ontario Heritage Act for their cultural heritage value and interest.	MGP	Acknowledged. Proposed policy language has been incorporated.
74.	<b>7.14.12.4.4</b> A Heritage Conservation Plan setting out the conservation, adaptive re-use and long-term maintenance requirements for all identified cultural heritage resources will be provided by the development proponent(s) for development applications directly impacting cultural heritage resources.	MGP	Acknowledged. Proposed policy language has been incorporated and revised appropriately.
75.	<b>7.14.12.4.5</b> Every effort will be made to conserve the context of cultural heritage resources including orientation of buildings and structures, viewsheds to and from cultural heritage resources, and mature vegetation and landscape features, including but not limited to specimen trees, hedgerows, remnant orchards, windbreaks, and laneways.	MGP	Acknowledged. Proposed policy language has been incorporated and revised appropriately.
76.	<b>7.14.12.4.6</b> Cultural heritage resources will be provided with an adequate lot size to provide space for their fulsome adaptive re-use, including space for future additions and landscaping, in accordance with the context and character of the cultural heritage resource.	MGP	It is our opinion that this policy should be removed from the secondary plan as the requirement is too onerous to be included as an Official Plan policy.
77.	Additional policies will have to be developed in collaboration with Heritage staff and other relevant departments to address the re-use of the former railway corridor.	MGP	Acknowledged.
<b>Secondary Plan Schedule A – Land Use Plan</b>			
78.	Add ‘H’ symbols to Land Use Plan to identify location of all cultural heritage resources within Secondary Plan boundaries.	MGP	The addition of symbols to the OPA schedules may trigger unnecessary amendments in the future should the status of resources change, and given the report identification of features and the protections under the planning act.

#	Comment	Consultant	Response
<p><b>Peel Region – Development Services</b>                      Patrick Amaral, Principal Planner                      February 13, 2024</p>			
<p><b>Planning and Development</b></p>			
<p><u>2051 Region of Peel Official Plan</u></p>			
79.	The proposed Secondary Plan lands are identified within the Urban System and Designated Greenfield Area in schedule E-1 and E-3 of the Peel Region Official Plan. Other portions of the land are designated Rural system and is located outside the Regional Urban Boundary. Schedule E-2 identifies Agricultural Land Base and Greenbelt Area on the portion of the subject lands outside of the Regional Urban Boundary. Furthermore, Schedule F-1 shows that the Conceptual GTA West Corridor and Transitway Corridor bisects the subject lands.	MGP	Noted.
80.	The policies of the Peel Region Official Plan and, in particular, section 5.6.20 Designated Greenfield Areas apply to the review of the Secondary Plan. As noted, a majority of the Secondary Plan are also identified within the 2051 New Urban Area subject to policies in Section 5.6.20.14.	MGP	Noted.
81.	Revised materials and a fulsome assessment will be required to demonstrate how the proposed application satisfies the policies and contributes to the overall objectives of the Region of Peel Official Plan and matters that are required prior to the Town approving Official Plan Amendments for new Secondary Plans. These include but are not limited to the need for secondary plan areas, a Staging and Sequencing (Phasing) Plan, the structure of a connected transportation system and other technical studies required by the Region and Town including those identified below: <ul style="list-style-type: none"> <li>• A Staging and Sequencing Plan;</li> <li>• Structure of a connected transportation system;</li> <li>• A detailed Subwatershed study or equivalent study;</li> <li>• A Community Energy and Emissions Reduction Plan;</li> <li>• A Climate Change Adaption Plan;</li> <li>• An Agricultural Impact Assessment;</li> <li>• A Housing Assessment;</li> </ul>	MGP Candevcon Palmer	A CEISMP has been prepared for the MW2-3 Lands as an equivalent study to the SWS as per the Region of Peel requirements.  In addition, a Gap Analysis for the SWS was further provided by Palmer which is included in this submission.
82.	As described above, the Region of Peel Official Plan outlines the necessary studies and matters that are required to be satisfactory to the Region and the Town prior to the Town approving Secondary Plans within the 2051 New Urban. At this time, these items remain outstanding and the policy directions within the Region’s Official Plan have not been fully addressed, therefore the Local Official Plan Amendment has not satisfied the requirements for exemption from Regional approval in accordance with Regional by-law 1-2000.	Owner/MGP	Please refer to the Planning Opinion Addendum which addresses the additional information requested above.
83.	<p><u>A Staging and Sequencing (Phasing) Plan</u></p> <p>As per RPOP policy 5.6.20.14.16, Approval of secondary plans by the Town within the 2051 New Urban are to proceed only in accordance with staging and sequencing (Phasing) plans to the satisfaction of the Region. The staging and sequencing plan must ensure orderly, fiscally responsible and efficient progression of development that is coordinated with the Region’s Capital Plan, Peel Water and Wastewater Master Plan, and Transportation Master Plans. At the moment, this phasing plan has not yet been approved by the Town to the satisfaction of Peel Region.</p>	Owner/MGP	A Scoped Development Staging and Sequencing Plan has been prepared and is included in this resubmission.
84.	<p><u>Structure of a connected transportation System</u></p> <p>Regional Official Plan policy 5.6.20.14.12 requires the Town to permit approval of secondary plans within the 2051 New Urban Area only after the structure of a connected transportation system is planned to the Region’s satisfaction. This includes a conceptual alignment of a transit system for an East-West high order transit corridor.</p>	Owner/MGP	A connected collector road system is shown on the Land Use Plan and further included in the CDP addendum. Details on the proposed transit system to be provided through the development approvals process.

#	Comment	Consultant	Response
	Furthermore, Regional Official Plan policy 5.6.20.14.14 requires the Town to permit approval of secondary plans in the 2051 New Urban Area that include residential units beyond approximately an initial 10,000 units only after the jurisdiction and financing mechanisms for a complete local transit system are established to the Region’s satisfaction.		
85.	<p><u>A Detailed Subwatershed Study or Equivalent Study</u></p> <p>In accordance with New Urban Area policies of the Region Official Plan a detailed subwatershed study or an equivalent study is required prior to endorsing land uses for the secondary plan and prior to the adoption of the official plan amendment to implement the secondary plan. The policies require: (1) terms of reference to be prepared to the satisfaction of the Region and Town in consultation with the conservation authorities and relevant agencies; and (2) confirmation that the subwatershed study or equivalent study addresses the direction, targets, criteria and recommendations of broader scale or scoped subwatershed studies applicable to the 2051 New Urban Area. The Region completed a Scoped Subwatershed Study as part of the Peel 2051 Regional Official Plan Review Settlement Area Boundary Expansion Study. The scope Subwatershed Study provides natural heritage and water resource system management recommendations, direction, criteria and guidance to address how settlement expansion will be planned to avoid, minimize, and mitigate potential negative impacts.</p>	Palmer/ Candevcon	Based on the SWS ToR, the project team has completed a Comprehensive Environmental Impact Study and Management Plan (CEISMP) report for the MW2-3 Lands as an equivalent study that builds upon the results of the recently completed Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022). At the request of Peel Region staff, a Gap Analysis Assessment has also been completed that outlines each of the components of the ToR and how they have been addressed in the reporting provided.
86.	<p>Recommended terms of reference for the preparation of detailed subwatershed studies to support secondary planning are provided in the Scoped Subwatershed Study (See Part B Report: Appendix F). A copy of the study report is available on the Peel 2051 Regional Official Plan Review project website - <a href="https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp">https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp</a>. In order to address these requirements, Regional staff recommends that either:</p> <ol style="list-style-type: none"> <li>1) A broader scale detailed subwatershed study be prepared to guide secondary planning for future expansions of Mayfield West to ensure that water management and natural heritage system planning is coordinated and integrated as part of the comprehensive planning framework for the 2051 New Urban Area; or</li> <li>2) If a smaller staged secondary plan is considered for this ‘in process’ application, confirmation that an equivalent study such as a Comprehensive Environmental Impact Study and Management Plan (CEISMP) has been completed in accordance with terms of reference satisfactory to the Region and Town, in consultation with the conservation authorities and relevant agencies, that addresses the above noted policy direction for the 2051 New Urban Area.</li> </ol>	Palmer/ Candevcon	Based on the SWS ToR, the project team has completed a Comprehensive Environmental Impact Study and Management Plan (CEISMP) report for the MW2-3 Lands as an equivalent study that builds upon the results of the recently completed Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022). At the request of Peel Region staff, a Gap Analysis Assessment has also been completed that outlines each of the components of the ToR and how they have been addressed in the reporting provided.
<i>CEISMP</i>			
87.	If an ‘equivalent study’ approach is preferred, the first submission CEISMP (and related technical reports) should be reviewed on the basis of updated terms of reference, and, if necessary, updated to confirm that it comprehensively addresses the direction, targets, criteria and recommendations of the Region’s Scoped Subwatershed Study.	Palmer/ Candevcon	Acknowledged.
88.	At a minimum, this should include confirmation from the Town and TRCA that:	Palmer/ Candevcon	Based on the detailed work completed by the Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022), the MW2-3 Functional Servicing Report (FSR) (Candevcon, 2024) and the updated MW2-3 CEISMP Report (Palmer, 2024), it is our opinion that each of these items have been covered to the extent needed to assess the potential impacts from the proposed development, identify future studies to be completed during detailed design and that are consistent with other CEISMP ‘equivalent

#	Comment	Consultant	Response
	<ol style="list-style-type: none"> <li>1) The characterization, impact assessment and management recommendations for the secondary plan have considered the impact of planned urban development within the broader catchment area(s) impacted by the secondary plan;</li> <li>2) The appropriate hydrologic, hydraulic and hydrogeologic modelling of potential impacts has been undertaken and that further modelling/assessment of future planned development at a broader catchment(s) scale is not needed;</li> <li>3) The CEISMP includes assessments of impacts associated with climate change for relevant study components (e.g., hydrology, flooding and stormwater);</li> <li>4) The recommended surface and ground water management recommendations have considered and/or addressed requirements within the broader subwatershed/catchment(s) based on the impact analysis; and,</li> <li>5) The CEISMP and proposed secondary plan has addressed the natural heritage system targets of the broader Scoped Subwatershed Study and are to be achieved and integrated within the secondary plan.</li> </ol>		<p>studies’ for the Mayfield West Area. The MW2-3 Lands represent a local catchment area for both groundwater recharge and discharge, as well as surface water resources. The team is committed to maintaining or enhancing the management of surface water, groundwater and natural heritage resources through development of the MW2-3 Lands.</p>
89.	<p>If an ‘equivalent study’ CEISMP approach is preferred, it is recommended the study terms of reference identify both a primary (of the secondary plan area itself) and secondary study area encompassing the broader subwatershed surface and groundwater water catchments potentially impacted by the secondary plan as a basis for completing the impact assessment components for the secondary plan.</p>	Palmer/ Candevcon	<p>As discussed above, the MW2-3 Lands represent a local catchment area for both groundwater recharge and discharge, as well as surface water resources. The team is committed to maintaining or enhancing the management of surface water, groundwater and natural heritage resources through development of the MW2-3 Lands.</p>
90.	<p>In this location, the Toronto and Region Conservation (TRCA) are the Region’s technical advisors with regards to flooding and erosion. Prior to the Region’s support of the CEISMP for the LOPA, TRCA must be satisfied that any technical comments, should TRCA have any, have been sufficiently addressed.</p>	Palmer/ Candevcon	<p>Acknowledged</p>
<b>Agricultural Impact Assessment (AIA)</b>			
91.	<p>It is Regional staff’s opinion that the AIA report completed by Stantec Consulting will require further revisions in order to more clearly document how policies in the Growth Plan in the ROP have been satisfied. The Region undertook a Phase 1 and Phase 2 AIA as part of the 2051 Peel Official Plan Settlement Area Boundary Expansion. The proponent’s submitted AIA, as part of the first submission materials, has not referenced this material or findings. A copy of the study report is available on the Peel 2051 Regional Official Plan Review project website - <a href="https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp">https://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp</a>. Regional staff recommend that the currently submitted AIA incorporate AIA requirements for this secondary plan.</p>	Stantec	<p>We acknowledge the Region’s AIA as the primary document addressing the removal of the 2-3 lands from Prime Agricultural Areas to be within the Settlement Area.</p> <p>Minimum Distance Separation requirements do not apply within a Settlement Area, and the proposed use is for full urbanization of the area. Accordingly, any potential to mitigate impacts on existing farms outside of the settlement area boundary will be addressed through the submission of development applications.</p> <p>Accordingly, the AIA report does not replicate the Region’s work, and instead confirms that in an urbanized setting, there are no longer prime agricultural areas within the 2-3 lands.</p> <p>It should be noted that the Town confirmed via email correspondence on March 27, 2024 that the Region will be conducting a review of the AIA. Comments from the Region have not been provided as the time of this submission.</p>

#	Comment	Consultant	Response
92.	In considering that the majority of the boundaries for the secondary plan are adjacent to planned future urban areas within the 2051 New Urban Area or are adjacent to narrow Greenbelt valleys with limited potential for ongoing agricultural uses to continue, the Town may also wish to request the applicant revise the submitted AIA including addressing what mitigation, if any, might be appropriate to consider as part of the secondary plan for edge planning of adjacent agricultural uses	Stantec	The AIA report confirms that the ongoing use of Greenbelt lands for agricultural uses is not likely to continue in an urbanized state. It is appropriate to consider non-agricultural use permissions in this area (in particular parks and stormwater management facilities).
<u>Community Energy and Emission Reduction Plan and Climate Change Adaption Plan</u>			
93.	The Community Energy and Emissions Reduction Plan (CEERP) and The Climate Change Adaption Plan (CCAP) are new study requirements for each secondary plan area to address Peel Region official Plan policies 5.6.20.14.17d) i) to v) and 5.6.20.14.17 e) i) to ii) and will require terms of reference to be prepared to the satisfaction of the Town. <ul style="list-style-type: none"> <li>• A terms of reference has been drafted and shared with the Town. It can be provided as a reference guide for the preparation of the two studies.</li> </ul>	Owner/MGP	It is our opinion that a CEERP is not required as it is not the intention to provide community-based energy production for MW2-3. Further information is provided in the Planning Opinion Addendum Letter.
<u>Housing Assessment</u>			
94.	For planning applications of approximately 50 units or more, RPOP policies require the submission of a Housing Assessment that is consistent with local and Regional housing objectives and policies to demonstrate contributions towards Peel-wide new housing unit targets shown in Table 4 of the 2051 Region of Peel Official Plan. These targets are determined through the Peel Housing and Homelessness Plan and the Regional Housing Strategy. A satisfactory Housing Assessment will be a requirement prior to adopting a privately initiated official plan amendment for a new secondary plan.	MGP	Acknowledged.
95.	It is acknowledged that the applicant has included housing analysis in a planning opinion report and other aspects of their submission. Following our review, we offer the comments below and are willing to meet with the applicant to review opportunities to further contribute to Peel-wide housing units targets:		
96.	Affordability: <ul style="list-style-type: none"> <li>• To contribute to the Peel-wide affordable housing target and to address policy 3.5.3.6 of the Town of Caledon Official Plan, the applicant is encouraged to provide units at prices that are affordable to low- or moderate-income households. The definition of ‘affordable housing’ can be found in the Glossary section of the RPOP. Information on pricing (sale price, average rent) and affordability period (i.e., 25 years or more) of units can be provided. <ul style="list-style-type: none"> <li>○ While it is anticipated that units identified to address moderate-income needs will be predominantly provided by the private sector, partnerships between the applicant, Peel Region, the Town of Caledon, and the non-profit sector should be included to provide units that are affordable to low-income households.</li> </ul> </li> <li>• As part of the applicant’s contribution to the Peel-wide new housing unit target for affordability, the applicant should consider a contribution of land or units to the Region and/or a non-profit housing provider to be used for affordable housing. Peel staff would be interested in working with applicant to establish terms of such a contribution involving the Region of Peel and/or connecting the applicant with a non-profit housing provider.</li> </ul>	MGP	Acknowledged. Please refer to the Planning Opinion Addendum Letter for further information on housing affordability.
97.	Density: <ul style="list-style-type: none"> <li>• It is appreciated that the applicant is demonstrating a contribution towards the density target by proposing that rear-lane and stacked townhouses comprise the majority of the anticipated number of dwelling units. The applicant is encouraged to review opportunities for rental tenure and more housing choice by incorporating additional residential units (ARUs) in a certain number of detached and semi-detached homes and townhouses, or having the option of ARU rough-ins. The applicant is encouraged to explore opportunities to promote affordable through secondary rental where feasible.</li> </ul>	MGP	Acknowledged. Please refer to the Planning Opinion Addendum Letter for further information on housing affordability.
98.	Additional Comments:	MGP	Acknowledged.



#	Comment	Consultant	Response
	<ul style="list-style-type: none"> <li>This application is located within an area that is a priority community for child care expansion. The applicant is encouraged to explore the opportunity of co-locating a licensed childcare centre within the proposed development, such as in ground floor mixed-use or indoor amenity spaces, where feasible. Please contact Paul Lewkowicz at paul.lewkowicz@peelregion.ca who can connect the applicant with staff in the Region of Peel’s Human Services Early Years and Child Care Services Division.</li> <li>The applicant is encouraged to incorporate universal accessibility and design features into the proposed development.</li> </ul>		
<b>Additional Planning Comments:</b>			
<i>Planning Justification Report (PJR)</i>			
99.	The planning opinion by MGP needs to be comprehensively reviewed and updated to demonstrate that policy requirements of the Provincial Policy Statement, Growth Plan, Greenbelt Plan and 2051 Regional Official Plan have been fully addressed.	MGP	Acknowledged.
<i>ROP Greenlands System</i>			
100.	Core Areas of the Greenland System, and Natural Areas and Corridors are identified on the subject lands. The requested MZO, LOPA and ZBA, as proposed, will permit residential, commercial and mixed commercial and residential uses within Core Areas of the Regional Greenlands system. At minimum, the Core Areas of the Greenlands System must be mapped as identified in the ROP and reflect the Environmental Policy Area designation identified on the Land Use Plan in the Planning Opinion Report prepared by MGP (dated July 2022) to accurately reflect the limits of the natural heritage feature(s) and areas with an appropriate zoning designation to ensure its protection.	MGP	Acknowledged. The limits of the Environmental Policy Area reflect what was determined through the CEISMP prepared by Palmer.
<i>Bill 150, Planning Statute Law Amendment Act, 2023</i>			
101.	On October 23, 2023, the Minister announced that modifications made to various official plans through the Provincial approval process will be reviewed and reversed. On November 16, 2023, Bill 150, the Planning Statue Law Amendment Act, 2023 was introduced, which proposed winding back ministerial modifications to approved official plans in twelve municipalities, including Peel Region. Bill 150 received Royal Assent on December 6, 2023, therefore the changes from Bill 150 are in-effect at this time.	MGP	Acknowledged.
102.	As a result of Bill 150, any Provincial modifications being reverted would come into effect as adopted by Regional Council on April 28, 2022, retroactively to the date of Provincial approval on November 4, 2022. Any decisions on applications already in progress seeking planning permissions and appeals are required to conform to the RPOP as legislatively approved under the Planning Statue Law Amendment Act.	MGP	Acknowledged.
103.	Through approval of the RPOP, a portion of the subject lands were modified by the Province from the Prime Agricultural Area designation to the Rural Lands designation. As this modification was reverted to the Council-adopted RPOP through Bill 150, the designation of the adjacent lands has reverted to Prime Agricultural Area as specified in the Council-adopted November 4, 2022 RPOP.	MGP	Acknowledged. Changes to provincial legislation has been addressed in the Planning Opinion Addendum Letter.
<i>Minimum Densities</i>			
104.	As per RPOP policy 5.4.19.7, development within Designated Greenfield Areas in Caledon is required to meet or exceed a minimum density of 67.5 residents and jobs combined per hectare. We ask that the applicant please clarify the total gross area and net developable area for the proposed expansion to the Mayfield West Settlement Boundary Area, as well as the proposed density of residents and jobs per hectare for the secondary plan.	MGP	As per the estimated population and job estimated from the DSSP, the proposed density will exceed the minimum density.
<i>Integration of Mixed/Non-residential uses</i>			
105.	We encourage the applicant to explore opportunities to integrate mixed/nonresidential uses into the proposed development. Peel staff would like to stress that planning for jobs is critical to maintaining a healthy economy, furthering economic development objectives, and contributing to the development of complete communities.	MGP	Acknowledged. Mixed Use areas have been incorporated into the Secondary Plan.
<b>Transportation Planning</b>			

#	Comment	Consultant	Response
106.	Schedule F-1 shows that the Conceptual GTA West (GTAW) Corridor and Transitway Corridor bisects the subject lands. Please note that the provided land use plan incorrectly shows the location of the GTAW corridor to the northwest of the subject lands, which should be rectified.	MGP/GHD	The final alignment of the Highway has not been determined. As per submissions and ongoing discussions with the Highway 413 project team, a review of the final alignment and our comments dating back 6 years is being undertaken, where we have recommended the highway be in the S4-2 alignment to the north. This is reflected on the proposed OPA schedules. Nevertheless, we have included a policy, and at the request of staff an alternative land use plan, to allow development to proceed based on the current alignment being considered by the Highway 413 team.
107.	<ul style="list-style-type: none"> <li>Portions of the subject lands as shown on the Conceptual Development Plan are within the Focused Analysis Area (FAA 2020) land protection boundary for the Highway 413 project. Lands within the FAA are being protected as they may be directly impacted by the Highway 413 transportation corridor, ancillary uses, or if refinements are made to the route during the preliminary design stage.</li> </ul>	MGP/GHD	Noted.
108.	<ul style="list-style-type: none"> <li>The application will need to be circulated to the Ministry of Transportation and Ministry of Energy for review and input.</li> </ul>	MGP/GHD	Noted.
109.	<ul style="list-style-type: none"> <li>Consistent wording and policies set out as per 5.6.20.14.21.1 of the Region Official Plan regarding the GTA West Preliminary Route Planning Study Area will need to be included in the Secondary Plan policies.</li> </ul>	MGP/GHD	Noted.
110.	The Region's 2019 Long Range Transportation Plan does not anticipate the road widenings identified in the Traffic Impact Study (authored by GHD) dated July 2022, it only forecasts widening Mayfield Road between Chinguacousy Rd and Hurontario St from 2 lanes to 4 lanes. Furthermore, an ongoing Transportation Master Plan is being developed to contribute insights for potential regional road enhancements in Caledon as part of the growth scenario analysis.	GHD	Noted. GHD reviewed all planned, proposed, and studied roadway improvements to provided consistency in what roadway improvements would be required to accomodate the subject lands.
<b>Development Engineering</b>			
111.	A Functional Servicing Report and Staging Plan is to be revised and submitted to the Region for review and approval to demonstrate sufficient capacity; showing in detail how the sanitary and water servicing will be provided to the Developer's Lands and how the sanitary and water servicing relates to the broader area within the entire Mayfield West, Phase 2 Stage 3 Block Plan. Notwithstanding this, the Region has determined that the existing system can accommodate the proposed development and that the infrastructure required to service the development can be constructed through proceeding subdivision applications and reviewed through associated engineering submissions to ensure the infrastructure is designed and constructed to Regional Standards.	Candevcon	The FSR has been updated.
<u>Wastewater</u>			
112.	Municipal sanitary sewer facilities consist of a 450mm diameter sewer on Chinguacousy Road and a 600mm diameter sewer on McLaughlin Road.	Candevcon	Acknowledged.
113.	A Functional Servicing Report (FSR) showing proposed sanitary sewer servicing plans for the development and provision for the adjacent land is required for review and approval by the Region prior to the engineering submission.	Candevcon	An FSR for the Brookvalley lands has been submitted to the Town for review
114.	Servicing of this development requires extension of sanitary trunk sewers on Chinguacousy Road and McLaughlin Road, as well as construction of a sanitary sewer pumping station within McLaughlin Road's vicinity.	Candevcon	The extension of sanitary services has been acknowledged and will be detailed in the draft plan FSR.
115.	External easements and construction will be required.	Candevcon	Acknowledged.
<u>Water</u>			
116.	The lands are located within Water Pressure Zone 7 supply system.	Candevcon	Acknowledged.
117.	Existing infrastructure consist of a 600mm CPP watermain on Chinguacousy Road 900mm CPP and a 400 PVC watermain on McLaughlin Road.	Candevcon	Acknowledged.

#	Comment	Consultant	Response																																																								
118.	A Functional Servicing Report (FSR) showing proposed water servicing plans for the development and provision for the adjacent land is required for review and approval by the Region prior to the engineering submission.	Candevcon	The extension of sanitary services has been acknowledged and will be detailed in the draft plan FSR.																																																								
119.	Extension of the existing 600mm dia watermain on Chinguacousy Road and extension of a 400mm dia watermain on McLaughlin Road will be required. Also construction of a new 400mm dia watermain on the proposed east-west collector road (south of Old School Road), 600mm dia watermain on Hurontario Road and a 750mm watermain on Old School Road will be required.	Candevcon	The extension of the watermains will be detailed as part of the Draft plan FSR.																																																								
120.	External easements and construction will be required.	Candevcon	The easement will be provided as required.																																																								
<b>General</b>																																																											
121.	All costs associated with servicing proposed development will be at the applicant's expense.	Owner	Servicing cost with the exception of those that are subject to DC reimbursement will be the responsibility of the owner.																																																								
122.	Servicing of this Plan will require construction of oversized watermains and sanitary sewers, including sanitary sewer pumping station, which are the financial responsibility of the Region as per Development Charges By-law and Policy F40-06.	Candevcon	Acknowledged.																																																								
123.	Should the Developer wish to proceed with the works in order to obtain clearance of the Draft Plan Conditions at a time when the Region is not prepared to fund the works, then the Developer will be required to enter into a Front-Ending Agreement prior to the construction of the works. This Agreement will be subject to the Region's determination that it has or will have sufficient funds to justify entering into the Front-Ending Agreement, Regional Council approval and has to comply with Regional Policy F40-06.	Owner	Acknowledged.																																																								
124.	The Front-Ending/Subdivision Agreement will contain clauses related to the Development Charges reimbursements. The DC reimbursements will be subject to satisfactory completion of the external watermains and sanitary sewers, sanitary forcemains and Sanitary Sewer Pumping Station (if applicable), upon preliminary acceptance of the services and until sufficient number of buildings is constructed to eradicate watermain flushing programs and for buildings to generate enough sewer flow for self-cleansing velocity in the sanitary sewer pipes.	Owner	Acknowledged.																																																								
125.	The required oversized watermains and sanitary sewers are included in the Regional Capital Forecast as follows:	Candevcon	Acknowledged.																																																								
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#	Comment	Consultant	Response
	56953 2185 McLaughlin road		
126.	The developer will be required to enter into applicable Development Agreement with appropriate agencies.	Owner	Acknowledged.
127.	The developer will be required to obtain and dedicate easements as required by the Region for Regional infrastructure.	Owner	Acknowledged.
128.	All sanitary sewers and watermain works within Chinguacousy and McLaughlin Roads (including the Sewer Pumping Station) must be co-ordinated and installed as part of the Town of Caledon’s road widening projects.	Owner	Acknowledged.
<b>Functional Servicing Report (FSR) Review</b>			
129.	The proposed development increases population above the Scenario 16 forecast for the SGU. The following comments are subject to change should the proposed population, water demands, and sanitary flows change:	[see below]	[see below]
<b>Wastewater</b>			
130.	The 2022 Preliminary FSR does not provide any information on estimated sanitary flows, as the land use type is still to be decided by the Official Plan Amendment.	Candevcon	The estimated flows have been added to the FSR.
131.	The Urbantech FSR (August 2017) did account for flows from the subject area in sizing the downstream sewers, and this report used a more conservative allowance of 80 people/Ha compared to the 60 people/Ha estimated for the subject area in the 2023 Aecom report. The sewers downstream of the subject area in the 2024 DC are the same size as what is proposed in the Urbantech FSR. Therefore, there is expected to be capacity in the system to accommodate sanitary flows from the subject area based off the current population estimates.	Candevcon	The estimated flows note above are based on the Urbantech population estimates.
132.	At this stage, the sanitary flows of the development proposed in the preliminary FSR can be accommodated by the existing system, and by using a new sewage pumping station on McLaughlin Road in the interim. To help service the interim solution, the following DC projects and their respective estimated construction start dates, are required:	Candevcon	Acknowledged.
133.	For the subject area east of McLaughlin Rd: <ul style="list-style-type: none"> <li>• 525 mm on McLaughlin Rd south of the creek -2025</li> <li>• McLaughlin SPS and force main crossing creek –2026</li> <li>• 525 mm on McLaughlin Rd north of the creek -2026</li> <li>• Ultimately, the eastern half of the subject lands will be serviced by the planned 1200-mm Hurontario St trunk main. The anticipated start of construction for the 1200-mm Hurontario Trunk Sewer is 2029.</li> <li>• 450 mm on Chinguacousy Rd -2030</li> </ul>	Candevcon	Acknowledged.
134.	The following are recommended for the future FSR: <ul style="list-style-type: none"> <li>• The sanitary servicing plan should take into account the latest DC projects. The 2021 DC infrastructure map used for the preliminary FSR has been superseded by the 2024 DC map.</li> <li>• The sanitary servicing maps and what is written in the report text should be consistent</li> <li>• The latest Peel Region's sanitary sewer design criteria should be used to estimate sanitary flows.</li> </ul>	Candevcon	The FSR has been updated to include the 2024 DC maps.
<b>Water</b>			
135.	The 2022 Preliminary FSR does not provide any information on estimated water demands, as the land use type is still to be decided by the Official Plan Amendment. However, the 2023 Aecom 'Mayfield West Phase 2 -Stage 3 Water Supply Feasibility Study' report and associated 'Alternate Supply Option Evaluation' memo do provide preliminary estimates. The hydraulic modelling by Aecom found that the Alloa PS has surplus capacity to supply the proposed water demands until 2031, after which capacity can be provided by equipping Alloa PS with its fourth pump.	Candevcon	The estimated flows have been added to the FSR.
136.	At this stage, the water demands of the development proposed in the preliminary FSR can be accommodated by the existing system and by utilizing the spare capacity in the Alloa PS. To help service the subject area, the following DC projects and their respective estimated construction start dates, are required: <ul style="list-style-type: none"> <li>• 600-mm main on Hurontario St -2025</li> </ul>	Candevcon	The proposed works have been added to the updated FSR.

#	Comment	Consultant	Response
	<ul style="list-style-type: none"> <li>10 ML West Caledon elevated tank and 750-mm main up Mississauga Road and along Old School Road from the elevated to subject area -2026</li> <li>600-mm main on Chinguacousy Rd -2026</li> <li>400-mm main on McLaughlin Rd -2026</li> </ul>		
137.	<p>The following are recommended for the future FSR:</p> <ul style="list-style-type: none"> <li>The water servicing plan should take into account the latest DC projects. The 2021 DC infrastructure map used for the preliminary FSR has been superseded by the 2024 DC map.</li> <li>The water servicing maps and what is written in the report text should be consistent.</li> <li>The latest Peel Region's Watermain Design Criteria should be used to estimate water demands.</li> <li>Hydraulic modelling should be updated with the proposed water servicing and latest Peel Region DC projects to confirm that fire flows can be met.</li> </ul>	Candevcon	The FSR has been updated to include the 2024 Dc mapping and water demands have been updated.
<b>Hydrogeological Review</b>			
138.	The report prepared by Palmer and dated July 4, 2022 provides a summary of the monitoring done for the proposed amendment. Results of water quality sampling are also provided and a general water balance and review of the Source Water Protection areas is also presented in the report. A monitoring plan or a contingency plan is not included in the report but has been mentioned to be included in a future Environmental Impact Report. The Region does not have any concerns with the report to support the proposed Official Plan Amendment provided that additional investigations and details will be provided to the Region for review and approval through completion of the Environmental Impact Report.	Palmer	Acknowledged.
<b>Public Health</b>			
Please note, an updated version of the HDA is available. Please submit the correct HDA tool from these links:			
139.	<a href="#">Development applications resources - Region of Peel (peelregion.ca)</a> and <a href="https://peelregion.ca/healthy-communities/#res">https://peelregion.ca/healthy-communities/#res</a>	MGP	Acknowledged.
140.	For the purposes of this review, Peel staff have compared this with the newer tool for commentary.	MGP	Acknowledged.
141.	<p>The HDA submitted in support of the Official Plan amendment for these lands has reached a pass on the tool and a Gold threshold overall. The site is on its way to creating a healthy built form. We have no objections to the Official Plan Amendment, but we wish to offer the comments below to further enhance the site design:</p> <ul style="list-style-type: none"> <li>To support active building frontages, we recommend orienting any of the commercial and medium density residential, linearly along the street to promote active street frontages.</li> <li>Please label sidewalks within the development. We recommend the inclusion of sidewalks on both sides of the road at a minimum of 1.5 m, however where it is not possible, we recommend a wider sidewalk of 1.8m on one side of the road.</li> <li>Consider permeable paving where possible within the development along with a variety of street trees that are hardy, resilient and low maintenance, planted at equal intervals adjacent to the streets.</li> <li>For any block sizes that exceed 80 by 180m in size, please include walkways to break up the block and provide enhanced connectivity.</li> </ul>	MGP	Acknowledged. This will be considered through the development approvals process. The nature of an Official Plan Amendment is permissive and a detailed assessment of housing by typology and the details in the comment can and will be addressed through the draft plans of subdivision and site plan applications.
<b>Waste Management</b>			
142.	All single and non-stacked townhouse units would be eligible to receive Region of Peel curbside cart-based waste collection of garbage, recycling, and organics provided that the requirements outlined in Sections 2.0 and 3.0 of the Waste Collection Design Standards Manual (WCDSM) are met;	Owner	Acknowledged.

#	Comment	Consultant	Response
143.	All multi-residential Apartment and stacked townhouse units would be eligible to receive Region of Peel front-end waste collection of garbage and recycling provided that the requirements outlined in Section 2.0 and 4.0 of the waste collection design standards manual are met;	Owner	Acknowledged.
144.	Retail and Employment units will be required to receive private waste collection	Owner	Acknowledged.
145.	For more information, please consult the following: <ul style="list-style-type: none"> <li>The Waste Collection Design Standards Manual available at: <a href="https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf">https://peelregion.ca/public-works/design-standards/pdf/waste-collection-design-standards-manual.pdf</a></li> </ul>	Owner Owner	Acknowledged.
146.	Through proceeding development stages a Waste Management Plan will be required to demonstrate how the WCDSM will be met.	Owner	Acknowledged.

**TRCA - Development Planning and Permits | Development and Engineering Services**

Michael Hynes, Senior Planner

February 2, 2024

Application Specific Comments:

147.	TRCA staff have completed a review of the noted application and offer detailed comments in Appendix I.  It is noted that due to missing information, the comments provided by TRCA staff at this time are high-level. Additional comments may arise during our review of future submissions as more detailed/updated information is provided by the applicant.	Owner	The information requested is provided in the resubmissions materials.
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**TRCA Plan Review Fee**

148.	By copy of this letter, the applicant is advised that our review of this application is subject to our November 2022 fee schedule. As it relates to this application, a base fee is required (\$17,035), plus a gross hectare charge (\$515X430 gross hectares = \$221,450) and a Minimum Project Management Fee of \$54,075. 70% of the combined fee is due at this time (\$204,792), while the remaining 30% (\$87,768) is necessary prior to final signoff of the OPA. In addition, TRCA's Complex Official Plan Amendment fee will also be required (\$23,850) at this time.  As such, the total outstanding fee currently due is \$204,792 (\$17,035 + \$221,450 + \$54,075 X 70% = \$204,792) + \$23,850 = \$228,410. <b>The applicant is asked to contact the undersigned as soon as possible to coordinate payment of this fee. The remaining balance of \$61,438 will be due prior to approval of the application.</b>  For more information, the applicant can refer to the Master Environmental Servicing Plan (MESP) section of our 2022 fee schedule: <a href="https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2022/11/17115507/Development-Planning-Fee-ScheduleNovember-10-2022.pdf">https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2022/11/17115507/Development-Planning-Fee-ScheduleNovember-10-2022.pdf</a>	Owner	Acknowledged.
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**Recommendation**

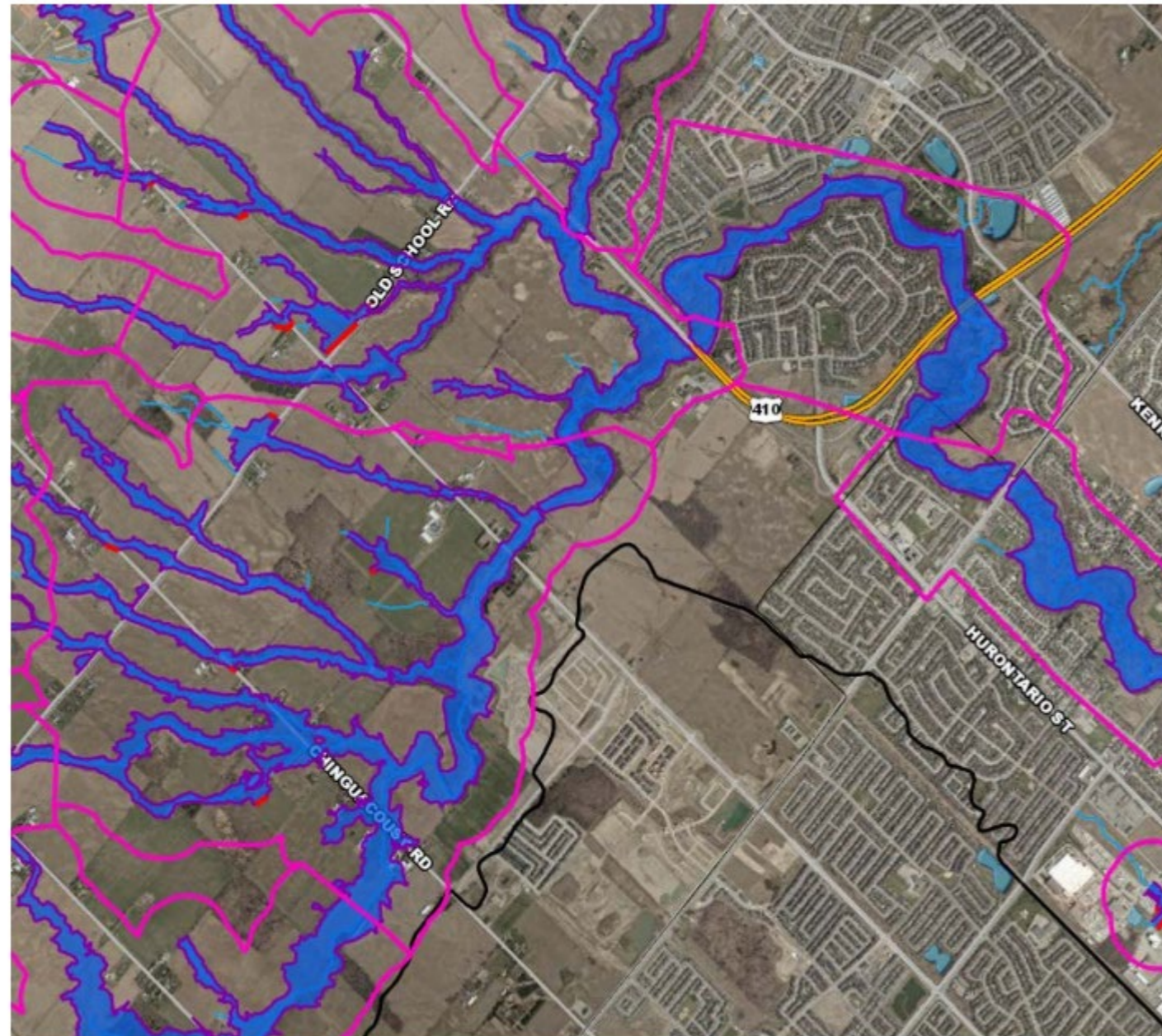
149.	Based on the review of TRCA staff, there are several threshold comments outstanding that must be addressed for staff to support the OPA and its supporting Local subwatershed Study. The comments are listed below and expanded in detail in the appending technical comments. It is our opinion that the OPA is premature until TRCA's comments in Appendix I and below are addressed to our satisfaction.	Candevcon	See our responses below
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The following points summarize TRCA staff's key priority comments:

150.	An approved Terms of Reference (ToR) is necessary prior to the initiation of a Secondary Plan process. The Region's Scoped Subwatershed Study prepared in support of its latest Official Plan update to expand the settlement boundaries in Caledon to accommodate growth to 2051, identified the studies required in support of future Secondary Plans. Terms of Reference (ToR) were prepared to assist the municipality and applicants with the preparation of required detailed Subwatershed Studies that would adequately characterize and assess development impacts as required under the Planning Act and Environmental Assessment Act. The ToR were to include an adequate assessment of information gaps and the approval of a core Technical Work Plan. The ToR has not been provided to adequately frame the necessary work plan, and subsequent characterization, evaluation, and impact analysis required in support of this OPA.	Palmer/ Candevcon	The SWS ToR and the approved 2017 MW2-3 ToR were relied upon for the scope of the CEISMP Report. As was agreed during the March 4, 2024 Brookvalley Secondary Plan Charrette meeting, a CEISMP Report would be prepared as an equivalent report and a Gap Analysis would also be prepared to identify conformance or gaps with the SWS ToR.
151.	The Town has deemed the OPA complete in the absence of the completed phasing strategy for SABE area secondary plans.	MGP	Acknowledged.
152.	The Comprehensive Environmental Impact Study and Management Plan (CEISMP) undertaken by CDC Candevcon Limited, dated February 19, 2019 needs to be amended and updated accordingly (4 years old) in accordance with comments provided in Appendix 1 below. The CEISMP displays outdated floodplain information.	Candevcon/ Palmer	An updated CEISMP Report (2024) has been prepared and provided with this submission. An updated FSR Report has also been provided (Candevcon, 2024).
153.	No site verification or staking of the existing valley corridors or Wetlands has been undertaken to the satisfaction of the TRCA. This requirement step in our determination of consistency with Section 3 of the PPS.	Candevcon/ Palmer	No feature staking was completed as part of the approved Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022) and in our opinion, is not a requirement of a SWS equivalent CEISMP Report for MW2-3. Feature staking would occur during the Draft Plan Application (DPA) stage as part of individual development applications to confirm the limits of development, if required.
154.	An updated slope stability analysis will be required. See detailed requirements in Appendix 1. The current submission has not provided the delineation of the LTSTOS on all site plans. The slope stability was undertaken in 2010, which is long-time ago (at a minimum 14 years ago). The site slope condition and erosion processes may have been changed since then, which needs to be taken into account through an updated study considering the current site condition.	Soil Eng/Palmer	The LTSTOS information from the AMEC CEISMP has been included in the updated CEISMP Report (Palmer, 2024). Based on field observations made by Palmer staff between 2018 and 2024, no obvious changes to the site slope conditions or erosional processes have been noted. The conclusions of the 2010 LTSTOS assessment by TerraProbe are still considered reasonable for the purposes of the OPA and Secondary Plan. The TerraProbe findings for LTSS limit will be provided at Draft Plan submission stage. An updated slope stability analysis with the delineation of the LTSTOS will be carried out at the detailed design stage, if required.
155.	Limits of Development must be finalized. The limits of the various features and hazards, including the long-term stable slop, must be demarcated on all plans along with the proposed buffers.	Palmer	No feature staking was completed as part of the approved Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood, 2022) and in our opinion, is not a requirement of a SWS equivalent CEISMP Report for MW2-3. Feature staking would occur during the Draft Plan Application (DPA) stage as part of individual development applications to confirm the limits of development, if required.
156.	The submission needs to provide conceptual grading plans and sections to demonstrate the grading differentials will be addressed in an appropriate and stable manner without impacting the valley slopes and their corresponding buffer from the greater of the physical top of slope and LTSTOS inland. Extensive grading into buffers and reduced setbacks are proposed throughout the Secondary Plan area.	Candevcon	Preliminary grading cross sections at key locations along the creek are included in the FSR showing that the site can be graded without impact on the NHS
157.	A Wetland evaluation using the OWES protocol is needed to re-evaluate recognition of wetlands within the Greenbelt vs those not within the Greenbelt, then a 30 m buffer around the greenbelt wetland will be required, as per TRCA Living City Policies and TRCA's Field Staking Protocol.	Palmer	An OWES assessment of wetlands was not completed as part of the approved Scoped Subwatershed Study, Part A, Part B and Part C Reports for Settlement Area Boundary Expansion (SABE) (Wood,

			2022) and in our opinion, is not a requirement of a SWS equivalent CEISMP Report. Detailed wetland assessment would occur during the Draft Plan Application (DPA) stage as part of individual development applications to confirm the limits of development.
158.	The Feature Based Water Balance analysis must identify and mitigate ecological impacts due to changes to water levels and hydrology.	Palmer	Acknowledged
<b>TRCA - Appendix I: TRCA Review Comments</b>			
Michael Hynes, Senior Planner February 2, 2024			
<b>Planning Ecology</b>			
<i>Comprehensive Environmental Impact Study and Management Plan (CEISMP)</i>			
159.	Section 2.1.2 – With process and legislative changes site stakings are required with both the Town of Caledon and TRCA.	Palmer	Feature staking would during the Draft Plan Application (DPA) stage as part of individual development applications to confirm the limits of development, if required.
160.	Section 3.4 – With the potential for wetlands to be re-evaluated through the current OWES, recognition of wetlands within the Greenbelt vs those not within the Greenbelt will be required in future submissions. There are wetlands currently designated PSW that would not qualify as significant if re-evaluated. However, those wetlands in the Greenbelt are afforded the same protections and buffering as PSW under TRCA’s LCP. This will require additional consideration of Greenbelt wetlands in future submissions.	Palmer	To be confirmed as part of future development applications for the lands within the MW2-3 Study Area.
161.	Section 4.2 – Greenbelt features and their VPZ’s should also be included in the high constraint section here. This is specifically important for wetlands.	Palmer	Acknowledged.
162.	Section 4.2 – The policy regime for non-significant features should be clarified in future submissions. In many instances, such features may require protection with reduced buffers or compensation for their removal. They may include non-significant wetlands or headwater drainage features, among others. Such protections or compensation requirements are not captured in this section and give a false sense that if a feature is not significant it is not a constraint.	Palmer	Acknowledged.
163.	Section Figure 8 – The content of this figure is entirely dependent on further study on various natural features, headwater drainage features, stakings and evaluations. It is recognized as premature until work can be undertaken to confirm the limits of development and other requirements.	Palmer	Additional studies have been included in the 2024 CEISMP that cover natural features, HDFs and wetlands.
164.	Section 8.4 – Overall commitments and concepts for restoration will be required at the block-level EIR stage. The general footprint of infrastructure, such as SWM ponds, within the Greenbelt will be determined at that stage. The requirements for restoration to buffer the impacts of that development within the Greenbelt will need to be determined at the same time.	Palmer	Acknowledged. Detailed regarding the footprint of supporting infrastructure and restoration concepts will be provided during subsequent design and approvals stages.
165.	FSR Figures 5, 6 and 7 – These figures show conceptual SWM pond facilities within features and their buffers. They include SWM ponds 3, 7, 10, 11, 12 and 13. It is recognized that these symbols are conceptual. However, to avoid confusion, they should be removed from features and their buffers. Please revise.	Palmer	The SWM Pond locations will be refined during the Draft Plan Application stage and will not be located within natural features. Many SWM Ponds are planned to be located within Greenbelt Lands, outside of applicable buffers.
<b>Water Resources Engineering</b>			
<i>Floodplain management</i>			
166.	Please take note that Figure 3 of Mayfield West Phase 2 – Stage 3 Comprehensive Environmental Impact Study and Management Plan Part A: Existing Conditions and Characterization displays outdated floodplain information. As shown in the map below, TRCA has recently updated the Flood Hazard Map. Therefore, please revise the figure and other figures that include flood hazard lines to reflect the updated TRCA Floodlines.	Palmer	Updated floodplain mapping is included with the overall Opportunities and Constraints Mapping (Figure 14) of the 2024 CEISMP Report.





167.	<p>It is noted that there are plans to fill some of the flood hazard areas. However, it is important to note that the Toronto and Region Conservation Authority (TRCA) flood hazard areas play a crucial role in conveying and storing floodwater. Disrupting these areas can worsen the flooding situation downstream, posing a threat to flood-vulnerable locations such as Downtown Brampton. It is mentioned that the applicant revised TRCA’s estimated HEC-RAS model. Please submit the digital HEC-RAS model for review along with the floodplain mapping in cad format.</p>	Palmer	Acknowledged. No revisions to the HEC-RAS modelling were made as part of the CEISMP.
<i>Stormwater Management</i>			
168.	<p>The applicant has suggested 13 SWM ponds to service to the proposed development. As per TRCA regulations, the applicant must utilize the criteria specified in the TRCA Stormwater Management Criteria document to ensure consistency with</p>	Candevcon	Acknowledged.

	erosion control, and water balance requirements. However, for quantity control, the applicant must adhere to the guidelines mentioned in the 2013 Etobicoke Creek Hydrology Update		
<b>Geotechnical Engineering</b>			
169.	<p>Slope Stability Study for Determination of Erosion Hazard Limit: The EIS document presented some selections from a previous general/high-level slope stability report in 2010; however, (i) the original report has not been provided in full version with all analyses; (ii) the excerpt of existing slope stability showed that the slope in the sections 6 and 7, the LTSTOS line needs to be setback from the top of slope, because of the combination of toe erosion and slope stability allowances; (iii) the LTSTOS line needed to be plotted on all site plans. The setbacks for LTSTOS from the existing top of slope also needed to be determined in the delineation of the LTSTOS. The current submission has not provided the delineation of the LTSTOS on all site plans; (iv) the slope stability was undertaken in 2010, which is long-time ago (at a minimum 14 years ago). The site slope condition and erosion processes may have been changed since then, which needs to be taken into account through an update study considering the current site condition.</p> <p>Prior to revising the slope study, the existing top of slope must be confirmed with TRCA staff on site for all valley corridors. The slope study would then confirm the stability of the staked limits over the long-term, and the long-term stable slope limits (erosion hazard limit) must be at least equal to if not further inland from the TRCA staked top of slope limit.</p>	Soil Engineers/ Palmer	<p>The LTSTOS information from the AMEC CEISMP has been included in the updated CEISMP Report (Palmer, 2024). Based on field observations made by Palmer staff between 2018 and 2024, no obvious changes to the site slope conditions or erosional processes have been noted. The conclusions of the 2010 LTSTOS assessment by TerraProbe are still considered reasonable for the purposes of the OPA and Secondary Plan.</p> <p>The TerraProbe findings for LTSS limit will be provided at Draft Plan submission stage.</p> <p>An updated slope stability analysis with the delineation of the LTSTOS will be carried out at the detailed design stage, if required.</p>
Having said the above, the following needs to be provided for the determination of the erosion hazard limits:			
170.	<ul style="list-style-type: none"> <li>A new slope stability review/update needs to be provided by geotechnical engineer reviewing and refining previous studies, assessing the current site condition, covering the slopes for the entire site, identifying gaps in the previous high-level studies, providing additional analysis and assessments to determine the LTSTOS line for a factor of safety of 1.50 for the entire site (including the areas of sections 6 and 7, which the previous studies conformed the risk of erosion hazard resulting in significant setbacks from the top of slope. The general terms of reference for the update/refined slope stability review report needs to be as per the TRCA Geotechnical Engineering and Design Submission Requirements (2007): (<a href="https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2016/02/17173003/PDPM_G_GEDSR.pdf">https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2016/02/17173003/PDPM_G_GEDSR.pdf</a>)</li> </ul>	Soil Engineers / Palmer	<p>A FOS of 1.4 was previously used by TerraProbe for the LTSTOS. The conclusions of the 2010 LTSTOS assessment by TerraProbe are still considered reasonable for the purposes of the OPA and Secondary Plan, and can be refined during later design stages.</p> <p>An updated slope stability analysis with the delineation of the LTSTOS satisfying a FOS of 1.5 will be carried out at the draft plan stage, if required.</p>
171.	<ul style="list-style-type: none"> <li>Furthermore, the LTSTOS line determined and/or verified with the update stability study needs to be plotted on all site plans showing all necessary setbacks for the erosion hazard.</li> </ul>	Soil Engineers	Acknowledged.
172.	All Site Plans: The LTSTOS line as per the refined/updated slope stability study mentioned above needs to be plotted on all submitted site plans covering all slope sections, as a constrain for development with respect to the erosion hazard over the long-term.	Soil Engineers	Acknowledged.
173.	Conceptual Grading Plans and Sections: The submission need to provide conceptual grading plans and sections to demonstrate the grading differentials will be addressed in an appropriate and stable manner without impacting the valley slopes and their corresponding buffer from the greater of the physical top of slope and LTSTOS inland.	Soil Engineers/ Candevcon	Acknowledged.

#	Comment	Consultant	Response
<b>Ministry of Municipal Affairs and Housing</b> Jennifer Le January 4, 2024 Consistency/Conformity with Provincial Policies			
174.	A portion of the Subject Lands appear to be located within the Focused Analysis Area (“FAA”) of the Highway 413 Transportation Corridor (“Highway 413”), wherein urban uses are proposed in the OPA. Based on ministry staff’s review of	MGP	Noted.

#	Comment	Consultant	Response
	the Planning Opinion Report, we understand that the proponent is aware of the Environmental Assessment that is currently being undertaken by the Ministry of Transportation on the Highway 413.		
175.	<p>Ministry staff circulated the application to the Ministry of Energy, who advised that a portion of the Subject Lands appear to be located within the Narrowed Area of Interest (“NAI”) of the Northwest Transmission Corridor Study, wherein urban uses are proposed in the OPA. The Northwest GTA Transmission Corridor Study is actively being pursued by the Ministry of Energy and the Independent System Operator that will identify a transmission corridor through the Mayfield West Phase 2-Stage 3 lands.</p> <p>The NAI is the current study area that continues to be protected from any development that could impact the future use of these lands for transmission infrastructure. A map of the NAI is attached to this email and a kml file is available at this link <a href="https://data.ontario.ca/dataset/northwest-greater-toronto-area-transmission-corridor-study-area">https://data.ontario.ca/dataset/northwest-greater-toronto-area-transmission-corridor-study-area</a></p>	MGP	Noted.
176.	<p>In-effect policies 1.6.8.1 and 1.6.8.3 of the Provincial Policy Statement, 2020 and policy 3.2.5.1 of the Growth Plan for the Greater Golden Horseshoe, 2019 require planning authorities to plan and protect planned infrastructure corridors for current and future needs, and to prohibit development in planned corridors that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.</p> <p>Ministry staff note that the supporting studies/documentation should demonstrate how the in-effect corridor protection policies of the PPS and Growth Plan are being met.</p>	MGP	The Planning Opinion Report addresses policies related to the GTA West Corridor.
177.	Consideration may be given to including corridor protection policies and an overlay of the planned corridors in the OPA, to ensure that the amendment is appropriately planning and protecting for the Highway 413 FAA and the Northwest GTA Transmission Corridor NAI.	MGP	An overlay of the Technically Preferred Alignment of Highway 413 is shown on the OPA schedule.
178.	Ministry staff defers technical comments respecting the Highway 413 FAA to MTO.	MGP	Acknowledged.
179.	Ministry staff ask that the Town add the Ministry of Energy to the circulation list for any future development applications in the NAI. Applications can be sent to: <a href="mailto:NWGTATransmissionCorridorStudy@ontario.ca">NWGTATransmissionCorridorStudy@ontario.ca</a>	MGP	Acknowledged.
<b>Conformity with the Peel Region Official Plan</b>			
180.	Ministry staff understand that the proposed OPA, prepared in July 2022, was based on the adopted Peel Region Official Plan that was with the ministry for a decision at the time. On November 4, 2022, the ministry approved the Peel Region Official Plan, including the corridor protection policies and the conceptual mapping of the Highway 413 and the Northwest GTA Transmission Corridor on Schedule F-2 – Major Road Network.	MGP	Acknowledged.
181.	<p>It appears that a portion of the lands are located within the conceptually mapped corridor shown on Schedule F-2 – Major Road Network of the Peel Region Official Plan.</p> <p>Ministry staff note that supporting studies/documentation should demonstrate how the corridor protection policies in the Peel Region Official Plan are being met, which specifically require the Highway 413 and the Northwest GTA Transmission Corridor to be planned for and protected to meet current and projected needs, and prohibits development in these planned corridors that could preclude or negatively affect the use of the corridors.</p>	MGP	The Planning Opinion Report addresses policies related to the GTA West Corridor.
182.	<p>Ministry staff understand that the November 4, 2022 decision on the Peel Region Official Plan brought a portion of the Subject Lands into the Settlement Area and through a modification, redesignated the balance of the Subject Lands that are located within the Greenbelt Plan area, from Prime Agricultural Area to Rural Land.</p> <p>On December 6, 2023, Bill 150, the Planning Statute Law Amendment Act, 2023, received Royal Assent and enacted the Official Plans Adjustment Act, 2023. Bill 150 reversed the ministry’s November 4, 2022, decision on the Peel Region Official</p>	MGP	Acknowledged and addressed through the Planning Opinion Addendum Letter.

#	Comment	Consultant	Response				
	<p>Plan and brought into effect the official plan as adopted by Peel Regional Council, with certain modifications maintained through legislation.</p> <p>It appears that the same portion of the Subject Lands will remain within the Settlement Area, as in the adopted Peel Region Official Plan. However, it appears that the Official Plans Adjustments Act, 2023 reversed the redesignation of the Greenbelt lands; these lands are now designated as Prime Agricultural Area, as in the adopted Peel Region Official Plan. Ministry staff understands that the OPA proposes to redesignate those Greenbelt lands from Prime Agricultural Area to Rural Lands. We note that the OPA must demonstrate conformity with the Peel Region Official Plan, which designates them as Prime Agricultural Area.</p>						
<b>Ministry of Transportation</b> Johnathan McGarry December 22, 2023							
183.	The MTO Highway 413 project team’s initial comments on this file are as follows:						
184.	The subject lands as shown in the “Land Use Plan – Mayfield West Phase 2 – Stage 3 Caledon” are partially within the Focused Analysis Area (FAA 2020) land protection boundary for the Highway 413 project. The Highway 413 project team is unable to endorse the advancement of new developments within the FAA limits at this time. Lands within the FAA are being protected as they may be directly impacted by the Highway 413 transportation corridor, ancillary uses, or if refinements are made to the route during the preliminary design stage. Further, the location of the Highway 413 corridor shown on the land use plan is not accurate. Current mapping for the corridor is available here: <a href="https://experience.arcgis.com/experience/db76d6b5387140dab22f07c17c1ac346/">https://experience.arcgis.com/experience/db76d6b5387140dab22f07c17c1ac346/</a>	MGP	Acknowledged.				
185.	The project is currently in the planning, environmental assessment and preliminary design phase. Property requirements and release of FAA lands for the project will be determined at the completion of the preliminary design phase.	MGP	Acknowledged.				
186.	Please also be advised that this property is within the Narrowed Area of Interest for the Northwest GTA Transmission Corridor study; please ensure their team is on your contact list: <a href="mailto:NWGTATransmissionCorridor@ontario.ca">NWGTATransmissionCorridor@ontario.ca</a> .	MGP	Acknowledged.				
<b>Peel District School Board – Planning and Accommodation Dept.</b> Zach Tessaro, Planner December 21, 2023							
187.	The Peel District School Board (PDSB) has reviewed the above-noted application for the proposed development consisting of 4,550 residential units (1,883 single/semi-detached and 2667 townhouse). PDSB has the following comments on the draft Official Plan Amendment based on its School Accommodation Criteria:						
188.	<b>Section 7.14. 8.2/3 – Please be advised that PDSB requests two (2) elementary school sites consisting of 3.24ha (8 Acres) to serve this new development.</b>	MGP	Acknowledged. Two public elementary school site are provided in the revised OPA.				
189.	<b>Section 7.14.4.3.11</b> – This policy states that a Community-Wide Development Staging and Sequencing Plan (DSSP) is not required. PDSB requests that the policy be revised to include the requirement of a phasing plan to ensure that schools are not left until the final phases of development.	MGP	A scoped DSSP is included in the resubmission.				
190.	<b>Section 7.14.8.4</b> – PDSB requests 2 street frontages to accommodate access to the school sites for busing, student drop-off and staff parking.	MGP	Acknowledged.				
191.	The anticipated student yield from this plan is as follows for the units that were provided in this submission: <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><b>Kindergarten to Grade 8</b></td> <td style="text-align: center;"><b>Grade 9 to 12</b></td> </tr> <tr> <td style="text-align: center;">1,533</td> <td style="text-align: center;">560</td> </tr> </table>	<b>Kindergarten to Grade 8</b>	<b>Grade 9 to 12</b>	1,533	560	MGP	Noted.
<b>Kindergarten to Grade 8</b>	<b>Grade 9 to 12</b>						
1,533	560						
192.	The students generated from this development would reside within the boundaries of the following schools:	MGP	Noted.				

#	Comment	Consultant	Response															
	<table border="1"> <thead> <tr> <th>Public School</th> <th>School Enrolment</th> <th>School Capacity</th> <th>Number of Occupied Portables</th> </tr> </thead> <tbody> <tr> <td>Alloa P.S.</td> <td>660</td> <td>625</td> <td>7</td> </tr> <tr> <td>Mayfield S.S.</td> <td>1,907</td> <td>1,734</td> <td>4</td> </tr> </tbody> </table>	Public School	School Enrolment	School Capacity	Number of Occupied Portables	Alloa P.S.	660	625	7	Mayfield S.S.	1,907	1,734	4					
Public School	School Enrolment	School Capacity	Number of Occupied Portables															
Alloa P.S.	660	625	7															
Mayfield S.S.	1,907	1,734	4															
193.	Conditions of Draft approval for PDSB school sites will be provided once a formal draft plan of subdivision is circulated.	MGP	Noted.															
194.	Please provide PDSB with a copy of the Notice of Decision. PDSB would like to continue to be an active partner in the development of the Mayfield West Secondary Plan. Should you require additional information, please contact me at zach.tessaro@peelsb.com.	MGP	Noted.															
<b>Dufferin-Peel Catholic District School Board</b> Krystina Koops, Planner December 19, 2023																		
195.	The applicant proposes the development of 1883 single and semi-detached units and 2667 townhouse units, which are anticipated to yield: <ul style="list-style-type: none"> <li>• 530 Junior Kindergarten to Grade 8 Students; and</li> <li>• 383 Grade 9 to Grade 12 Students</li> </ul>	MGP	Noted.															
196.	Based on the projected yields, a catholic elementary school will be required to service this plan. The proposed elementary school block is required to be a minimum of 6 ac (2.4 ha) in size. Additional we will require a facility fit plan to ensure that the block will be functional for the construction of an elementary school.	MGP	Acknowledged, the school site size has been revised accordingly. A facility fit will be provided at detailed design.															
197.	The proposed development is located within the following school catchment areas which currently operate under the following student accommodation conditions: <table border="1"> <thead> <tr> <th>Catchment Area</th> <th>School</th> <th>Enrolment</th> <th>Capacity</th> <th># of Portables / Temporary Classrooms</th> </tr> </thead> <tbody> <tr> <td>Elementary School</td> <td>St. Aidan</td> <td>416</td> <td>435</td> <td>5</td> </tr> <tr> <td>Secondary School</td> <td>St. Edmund Campion</td> <td>1798</td> <td>1542</td> <td>16</td> </tr> </tbody> </table>	Catchment Area	School	Enrolment	Capacity	# of Portables / Temporary Classrooms	Elementary School	St. Aidan	416	435	5	Secondary School	St. Edmund Campion	1798	1542	16	MGP	Noted.
Catchment Area	School	Enrolment	Capacity	# of Portables / Temporary Classrooms														
Elementary School	St. Aidan	416	435	5														
Secondary School	St. Edmund Campion	1798	1542	16														
198.	<b>Section 7.14.4.3.11</b> – This policy states that a Community-Wide Development Staging and Sequencing Plan (DSSP) is not required. DPCDSB requests that the policy be revised to include the requirement of a phasing plan to ensure that schools are not left until the final phases of development.	MGP	A scoped DSSP is included in the resubmission.															
<b>Additional Comments:</b>																		
199.	DPCDSB will require 1 catholic elementary school site this a minimum of 6 ac (2.4 ha) in size.	MGP	Acknowledged.															
200.	DPCDSB requires a facility fit plan be prepared to ensure functionality of the site. DPCDSB can provide CAD drawings of recent schools that have been built.	MGP	A facility fit will be provided at detailed design.															
201.	DPCDSB requests a phasing plan be requirement of the application. Language is currently vague requesting logical development.	MGP	A scoped DSSP is included in the resubmission.															
<b>Enbridge</b> Willie Cornelio, Sr Analyst Municipal Planning November 29, 2023																		
202.	Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions.	Owner/MGP	A scoped DSSP is included in the resubmission.															

**Watson & Associates Economists Ltd. Peer Review of the FIS**

Daryl Abbs  
 April 25, 2024

<b>Development Profile</b>			
<i>Development Statistics</i>			
203.	Based on the preliminary concept plan for the Mayfield West Phase 2 – Stage 3 Lands (hereafter referred to as “MW2-3 lands”), there are approximately 208 gross developable hectares within the development area. Based on an assumption of 67.5 residents and jobs per hectare, the development of these lands would result in additional population and employment of 13,061 and 914. Based on Watson’s experience, these assumptions are consistent with the land uses proposed in this area and are generally consistent with the densities observed for new developments of this type.	Arcadis	Acknowledged.
204.	Based on the anticipated population, the overall unit mix and number of units was also estimated. The persons per unit (P.P.U.) assumptions used in the F.I.A. for newly constructed units are consistent with the assumptions utilized in the Town’s 2019 development charges (D.C.) background study for the same development types. Utilizing the assumptions from the D.C. background study based on new unit types is consistent with Watson’s approach and is reasonable.	Arcadis	Acknowledged.
205.	Based on the estimate of non-residential square footage to be developed and the associated number of jobs, this results in a floor space per worker (F.S.W) assumption of approximately 240 sq.ft. per employee. Based on the Town’s 2024 D.C. background study, the F.S.W. assumption for population-related employment is approximately 540 sq.ft. per employee. Given this assumption, it appears that the F.S.W. assumption of 240 sq.ft./employee that was utilized is low. Utilizing a lower F.S.W. assumption would lead to an underestimation of gross floor area resulting in lower D.C. revenue and property tax revenue estimations. As a result, this may provide for a more conservative estimate or revenues and is reasonable.	Arcadis	Acknowledged. Adjustments to the breakdown of jobs has been made to better align with the population-related FSW assumptions from the DCBS.
206.	In general, IBI Group’s assessment of the growth forecast and the anticipated development profile within the study area is consistent with the methodology that Watson would utilize for this analysis, however, the assumptions utilized, specifically with respect to non-residential development, should be confirmed by Town planning staff or the peer reviewer that is responsible for reviewing the planning justification report	Arcadis	Acknowledged.
<i>Staging and Timing of Development</i>			
207.	IBI Group has estimated that residential construction would occur at a rate of 600 units per year within the Study Area. Based on Appendix A – Table A.1 of the Town’s 2024 D.C. background study, growth in occupied households on a Town-wide basis averaged approximately 560 units per year over the last five years. The assumption in the rate of growth for this area appears to be high, given that the growth rate in residential homes within this area exceeds the average annual historical growth rate in units at a Town-wide level.	Arcadis	Arcadis has maintained this level of absorption. This assumption is less than the yearly residential starts from Mayfield West Phase 2 – Stage 1 (847 units) and is below recent housing starts statistics (2021-2023) from CMHC for the Town of Caledon.
208.	It is noted that the analysis provided in the report is based on the complete build-out of the lands, therefore the phasing strategy does not impact the calculations, however, this assumed growth rate should be reviewed and assessed by planning staff.	Arcadis	Acknowledged.
<b>Capital Expenditures</b>			
<i>Growth-Related (D.C. Costs)</i>			
209.	Based on IBI’s analysis of capital needs, only the capital needs for roads, parks, and recreation were reviewed. It is noted that the identified growth in population for this area would result in a 20% increase in the Town’s overall population. Given the significant population associated with this development, all services should be reviewed as part of this analysis. This would include an assessment of the need for new fire stations, associated vehicles/equipment, operations centres, growth-related studies, etc.	Arcadis	The capital needs assessment has been broadened to look at roads, parks, indoor recreation, library and fire services.
210.	Although it has been acknowledged that this is a high-level assessment and not meant to provide an exhaustive review of all services, it is recommended that an analysis is undertaken on whether the proposed development gives rise to capital needs for other D.C. eligible or non-D.C. eligible services. The Town’s 2019 D.C. study and 2021 D.C. update study could inform the analysis of growth-related expenditures. The non-growth component of these costs (if any) should then be factored into the analysis.	Arcadis	The capital needs assessment has been broadened to look at roads, parks, indoor recreation, library and fire services.
<i>Roads and Related Capital Costs</i>			

211.	The analysis undertaken has identified three (3) road upgrades/widenings that would be required to accommodate this development. The analysis assumes that these works will be funded by D.C.s, however, given that these works are upgrades to existing roads, a portion of costs would likely benefit existing development. This non-D.C. component of the costs has not been factored into the analysis as a direct cost to the Town. Given that the Town would be required to fund any non-growth related portion of the costs, these costs should be estimated (e.g. as an annual debt payment) to identify the net impact on the Town's budget.	Arcadis	No BTE has been assigned to these roads for the time being as the three road projects would only be required due to future growth.
<i>Parks and Recreation</i>			
212.	The concept plan provides for 14.6 hectares of parkland in the study area. The D.C.- related cost to develop this parkland has been isolated and identified in the costing analysis, consistent with Watson's methodology.	Arcadis	Acknowledged.
<i>Community Infrastructure Projects</i>			
213.	Additional community infrastructure projects have been noted in Table 7 of IBI's report, however funding sources and the impact to the Town have not been considered. The non-growth-related portion of these capital projects should be estimated (e.g. as an annual debt payment) to identify the net impact on the budget. For example, in 2019 dollars, the non-growth component of the projects is as follows (as per the Town's 2021 D.C. update study): <ul style="list-style-type: none"> <li>• parkland and trail projects - \$675,000;</li> <li>• indoor recreation projects - \$2,977,877; and</li> <li>• library projects - \$701,753.</li> </ul> If the total of \$4.35 million was issued as debt over 10-years at 4% interest, the annual payments would be \$536,315.	Arcadis	Addressed. The capital needs assessment has been broadened to look at roads, parks, indoor recreation, library and fire services.
<i>Future Replacement (Lifecycle) Costs</i>			
214.	Once an asset is constructed by the Town and/or assumed by the Town (e.g. works constructed by the developing landowner), the asset becomes a liability that the Town must replace at the end of its useful life. In Watson's methodology, future replacement (lifecycle) costs would be captured as an annual amount that would be saved/invested for the ultimate replacement of the capital infrastructure constructed for a development area. These costs were not factored into the Mayfield West F.I.A. It is recommended that the full annualized lifecycle costs for the internal (i.e. local) works is factored into the analysis.	Arcadis	Acknowledged. A lifecycle analysis has been included in the updated FIA.
215.	With respect to the broader growth-related works (e.g., new facilities, arterial roads, etc.), the proportionate share of the lifecycle costs related to this development should be included in the annualized net impact to the Town. The broader lifecycle costs can be found in Table 6-1 of the 2021 D.C. Update Study (i.e. \$38.70 million). The proportionate share of the D.C. growth forecast that relates to this development area can be used to estimate the appropriate share of the lifecycle costs.	Arcadis	Acknowledged. A lifecycle analysis has been included in the updated FIA.
<b>Capital Revenues</b>			
<i>D.C. Revenues</i>			
216.	The D.C. revenues for all services that the Town collects for have been calculated and provided in Table 3 of the Mayfield West F.I.A. As noted above, only the capital costs related to roads and parks have been identified and factored into the analysis. As such, the D.C. revenue estimated has been compared to the expenditures, only for these services (Table 8). This is a reasonable approach.	Arcadis	Acknowledged.
217.	The analysis also provides an estimate of education D.C.s, however, given that these revenues and the associated expenditure are not Town-related, the identification of these revenues does not impact the Town's tax-supported budgets.	Arcadis	Acknowledged. This section has been removed.
218.	The analysis has identified that the D.C. revenues related to roads and parks are greater than the expenditures directly related to this development, as identified in the report. The report notes that the surplus can be used for other Town-wide projects that the development would benefit from. This is a reasonable assumption given the magnitude of the surplus for both services.	Arcadis	Acknowledged.
<b>Operating Expenditures</b>			

219.	Operating expenditures are based on the Town’s Financial Information Return data. Net operating expenditures (e.g. excluding debt payments, grants, etc.) by service were allocated a growth related percentage which provided for a growth-related net operating expenditure. This amount was then divided between the residential and non-residential sectors based on the following allocations: <ul style="list-style-type: none"> <li>• 77% residential/23% non-residential based on the Town’s existing population/employment split. This allocation was utilized for services that are expected to be equally utilized by the residential and non-residential sectors (e.g. roads, fire, general government, etc.)</li> <li>• 95% residential/5% non-residential allocation to recognize minor use by the nonresidential sector for services such as parks, recreation, libraries, etc.</li> <li>• 100% residential/0% non-residential allocation for services where only the residential sector benefits (e.g. assistance to aged persons)</li> <li>• 0% residential/100% non-residential allocation for services where only the nonresidential sector benefits (e.g. commercial and industrial planning)</li> </ul>	Arcadis	No Response required.
220.	These net growth-related operating expenditures were then divided by anticipated growth in population and employment to provide a per capita and per employee expenditure amount. These amounts were then applied to the growth anticipated in the Mayfield West Phase 2, Stage 3 lands to determine the total incremental operating expenditures related to the development.	Arcadis	No Response required.
221.	This approach and the allocation between residential and non-residential development is generally consistent with Watson’s methodology, however, given the additional infrastructure being installed, certain growth-related allocations may not be sufficient. For example, the growth-related share identified for fire services is 90%. If it is determined that a new fire station (or expansion) is required to service this development, it is likely that operating expenditures would be incurred at a higher ratio (e.g. 100% or greater), given the incremental costs required to operate a new facility, hire new firefighters, etc.	Arcadis	Acknowledged. Arcadis has increased various services to 95% growth related share but does not believe that 100% is appropriate given the abilities for economies of scale as well as the benefits afforded to existing residents for increased service.
222.	The growth-related shares should be considered with respect to the new infrastructure being constructed, given that incremental operating costs may be significant for this development area for services such as roads/public works, parks, fire, etc.	Arcadis	Acknowledged, changes have been made where appropriate.
<b>Operating Revenues</b>			
223.	Property tax revenues and non-tax revenues have been assessed separately for the proposed development, which is consistent with Watson’s methodology.	Arcadis	No Response required
<i>Non-Tax Operating Revenues</i>			
224.	The non-tax revenue analysis is presented in a similar format to the expenditures. This is consistent with the methodology utilized by Watson. The growth related allocations and shares between residential and non-residential appear to be reasonable.	Arcadis	No Response required
<i>Property Assessment and Tax Revenue</i>			
225.	Incremental assessment growth and the associated property tax revenues have been forecasted based on recently constructed developments of similar type within Caledon. This is consistent with Watson’s methodology. A review of the assessment values per unit was undertaken and based on newly constructed homes in Mayfield West, the average values utilized for this analysis appear reasonable.	Arcadis	No Response required
226.	The 2022 tax rate has been applied to the average assessment per unit based on the estimated units and square footage of non-residential floor area to be developed. This is consistent with Watson’s methodology in calculating incremental property tax revenues. It is noted that the analysis is consistent in identifying all costs and revenues in 2022 dollars.	Arcadis	No Response required
<b>Net Financial Impact</b>			
227.	The net financial impact is provided at buildout for the proposed development. An annual operating surplus has been identified for the Town however, consideration should be provided to the above commentary and how these potential refinements may impact the analysis. The additional costs that should be added to the analysis (e.g. annual lifecycle	Arcadis	Acknowledged. The operating analysis has been updated to include asset-related operations and maintenance costs, lifecycle



	replacement costs) may reduce the positive annual net operating position. If the result of the analysis is that the development provides a positive net impact by the end of the forecast period, the Town would need to monitor cash-flow as the development area builds out, given that certain growth-related expenditures are often required prior to development.		costs, and tax-supported items from the DC (e.g. Benefit to existing).
<b>Conclusions</b>			
228.	The overall approach utilized in IBI’s F.I.A. to estimate the annual fiscal impact at buildout is generally reasonable, given that the following areas have been considered: <ul style="list-style-type: none"> <li>• Development profile</li> <li>• Assessment growth and tax revenue</li> <li>• Non-tax revenues</li> <li>• Incremental operating expenditures</li> <li>• D.C. related capital expenditures and associated funding through D.C.s</li> </ul>	Arcadis	No Response required
229.	Although the general approach is reasonable and largely consistent with Watson’s methodology, there are a number of assumptions that should be revisited, which would have varying impacts on the annual financial impact to the Town: <ul style="list-style-type: none"> <li>• Floor space per worker assumptions related to non-residential development (may increase D.C. and tax revenues);</li> <li>• Annual rate of development assumption (no anticipated impact on the analysis);</li> <li>• Assessment and inclusion of capital costs related to services other than roads, parks, and recreation (may reduce net operating position);</li> <li>• Calculation of non-growth-related (i.e. benefit to existing) costs and the net impact to the Town’s budget (may reduce net operating position);</li> <li>• Inclusion of lifecycle (replacement) costs for all infrastructure to be constructed by the Town in addition to works to be assumed from the developer (may reduce net operating position); and</li> <li>• Assessment of growth-related percentage for operating expenditures related to additional infrastructure (e.g. roads, fire, parks, etc.).</li> </ul>	Arcadis	<ul style="list-style-type: none"> <li>• Floor space per worker assumptions. See response 205.</li> <li>• Annual rate of development: see response 207.</li> <li>• Assessment and inclusion of additional capital costs: see responses 209-213.</li> <li>• Calculation of non-growth related: see response 211.</li> <li>• Inclusion of lifecycle: see response 214-215.</li> <li>• Assessment growth percentage: see response 221.</li> </ul>