

October 8, 2022

FILED PER THE ENVIRONMENTAL REGISTRY & REGULAR MAIL

Ministry of Municipal Affairs and Housing - Municipal Services Office - Central Ontario 777 Bay Street, 16th floor Toronto, Ontario M7A 2J3

Attn: Ms. Jennifer Le, Municipal Services Office - Central Ontario

Re: Region of Peel Official Plan - Peel 2051 - Comments on behalf of Orlando Corporation ERO No. 019-5535 - Ministry Reference No. 21-OP-215276 - Our File No. 1421

We are planning consultants retained by Orlando Corporation ('Orlando') offering the following comments regarding proposed Region of Peel Official Plan 2051 (the 'Plan'), pursuant to sections 26 and 17 of the *Planning Act*, currently before the Ministry for a decision per the *Planning Act*.

The Plan outlines a comprehensive framework of new and revised policies to guide growth and development within the Region to the year 2051 in conformity with provincial plans. Our comments concern the following proposed Plan policies.

Chapter 2: Natural Environment, Natural Heritage and Water Resource System Policies

2.12.13.2.11 Direct the City of Brampton and the Town of Caledon to include policies in their official plans to prohibit **development** and site alteration in **key natural heritage features** and **key hydrologic features** and in any associated **vegetation protection zone** in accordance with the policies of the Greenbelt Plan and this Plan, including policies that require:

a) the **vegetation protection zone** to be a minimum of 30 metres measured from the outside boundary of **wetlands**, **seepage areas and springs**, **fish habitat**, **permanent and intermittent streams**, **lakes** and **significant woodlands**; and

<u>Comment:</u> This policy ought to also acknowledge that an Environmental Impact Statement ('EIS'), or its equivalent, may recommend that a *vegetation protection zone* be less than 30 metres measured from the outside boundary of *wetlands*, *seepage areas and springs*, *fish habitat*, *permanent and intermittent streams*, *lakes* and *significant woodlands*, and that setbacks from environmental elements may be shared and overlap within a *vegetation protection zone*.



Chapter 5: Regional Structure, 5.8 Employment Areas

5.8.43 Encourage new development in existing office parks that enhances transit and active transportation connectivity and provides for an appropriate mix of amenities and open space. In planning for new office employment, surface parking will be minimized.

5.8.45 Employment Areas shall be planned and designed to minimize surface parking and be easily accessible by a range of transportation modes including transit and active transportation.

<u>Comment:</u> The minimization of surface parking should be interpreted broadly and be reasonably applied to a specific property and its land use configuration. Therefore it is requested that the policy be revised to acknowledge minimization of surface parking where circumstances permit.

Chapter 5: Regional Structure, 5.10 Transportation System, 5.10.37 Airports

5.10.37.12 Update Figure 15 with the latest Provincially issued Aircraft Noise Exposure Contours, as they become available.

<u>Comment:</u> Transport Canada uses a Noise Exposure Forecast ('NEF') system to provide a measurement of the actual and forecasted aircraft noise contours in the vicinity of airports.

We would also appreciate our firm being placed on the Ministry's mailing list regarding any future public notices, updates, reports, decision or actions on the above captioned matter. Thank-you in advance for your co-operation, and please advise if any additional information is required to further support our submission at your earliest convenience.

Yours truly,

Pound & Stewart Associates Limited

Philip Stewart MCIP, RPP

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cc. Ms. H. Watt, Manager, MMAH, Community Planning Development (West)

cc. Mr. A. Smith, Chief Planner & Director, Planning and Development Services, Region of Peel

cc. Mr. L. Longo, Aird & Berlis

cc. Client