

December 4, 2024

**By E-Mail and Online Submission**

Honourable Minister Paul Calandra  
Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13th Floor  
Toronto, ON M7A 2J3

Dear Minister Calandra:

**Re: Town of Caledon Official Plan No. 1 (the “OPA”)  
Comments of Aecon Infrastructure Management Inc.**

We are counsel to Aecon Infrastructure Management Inc. (“**Aecon**”), the owner of multiple aggregate operations in the Province, including the Aecon Caledon Pit located in the vicinity of Highway 10 and Charleston Sideroad in the Town of Caledon (the “**Caledon Pit**”). The Caledon Pit, near Caledon Village, has a total area of approximately 572 hectares (1,413 acres).

Regarding the OPA, Aecon is generally supportive of the Coulterville Special Study Area as depicted on Schedule E1. The Caledon Pit is included in the area subject to the Coulterville Special Study Area which contains a diverse range of land uses.

Among other things, the Coulterville Special Study Area policies acknowledge the need to examine appropriate after use of lands being used for aggregate extraction in the area to which it applies.

Anticipating the scale of the contemplated study, Aecon requests that a phasing policy be added to the Coulterville Special Study Area provisions. Phasing the study would help structure it and make the process more manageable.

The following additional policy language would make it clear that phasing of the study is anticipated and could be included as a new section 32.1.23(b):

- b) The study to be carried out within the Coulterville Special Study Area may be completed in phases to account for the diverse characteristics of lands within the area and differing after use potential.

Current subsections b) and c) would be relabelled c) and d), respectively.

Phasing the study would also allow for better coordination with the contemplated Town-wide Rehabilitation Master Plan provided for in section 20.5.12 of the OPA.

Thank you for the opportunity to provide these comments. We would be pleased to discuss this submission further, as needed.

Yours truly,

**DAVIES HOWE LLP**



Alex Lusty (he/him)

copy: Client