TOWN OF CALEDON
PLANNING
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PLANNING OPINION REPORT

Official Plan and Zoning By-law Amendments
12434 Dixie Road
Caledon, ON

Prepared For:

Nishan GTA Inc.



August 2026

MGP

Official Plan and Zoning By-law Amendments

Planning Opinion Report

12434 Dixie Road
Caledon, ON

Prepared by:

Malone Given Parsons Ltd
140 Renfrew Drive
Suite 201
Markham ON L3R 6B3

Prepared for:

Nishan GTA Inc.
1805 Chemin Saint-Francois
Dorval, QC H9P 2S1

Matthew Cory
MCIP, RPP, PLE, PMP

August 2026

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Executive Summary

Malone Given Parsons Ltd. represents Nishan GTA Inc., the registered owner of 12434 Dixie Road under the numbered company 10144789 Canada Inc. (the "Subject Lands") in the Town of Caledon. The Subject Lands total approximately 10.7 hectares (26.4 acres) in size and are located on the west side of Dixie Road, north of Mayfield Road. The surrounding area is made up of primarily agricultural and industrial uses, including an existing UPS facility immediately to the south, with the areas to the west, north and east, planned for future employment uses.

The purpose of this report is to provide a planning opinion with respect to the proposed development of a cross-dock facility. This proposal requires applications for an Official Plan Amendment and Zoning By-law Amendment. This Planning Opinion Report is prepared in support of the submission of these applications. It should be noted that a Temporary Use Zoning By-law Amendment (Town File No.: RZ 2021 0010) is proceeding concurrently to permit interim commercial truck and trailer parking on the Subject Lands pending build-out of the permanent facility. The proposed development will also require a future site plan application prior to development.

The proposed development provides an opportunity to accommodate employment land needs and demand for logistics and warehousing facilities, while protecting the existing natural heritage features on the Subject Lands.

The Subject Lands are designated Urban Area (Schedule E-1, Regional Structure) and Employment Area (Schedule E-4, Employment Areas) under the Peel Region Official Plan, and Urban Area (Schedule B1, Town Structure), New Employment Area, Prime Agricultural Area, and Natural Features and Areas (Schedule B4, Land Use Designations) under the Future Caledon Official Plan. The proposed development is an employment use consistent with the Provincial Planning Statement, 2024 and implements Provincial, Regional, and municipal policy. The site plan proposes an efficient and logical layout of the warehouse, parking, loading, and stormwater management facilities, making use of the existing buildings and protecting the existing natural heritage features.

The proposed development requires an Official Plan Amendment to establish a site-specific land use designation on the Subject Lands (General Employment with a Goods Movement overlay designation and Natural Features and Areas), in place of the general New Employment Area designation, to permit the proposed cross-dock and logistics/warehousing use. A Zoning By-law Amendment is required to rezone the Subject Lands to Serviced Industrial and Environmental Protection Area 2 with site-specific exceptions to facilitate the proposed use.

In my opinion, the Official Plan Amendment and Zoning By-law Amendment are consistent with, and conform to, the applicable Provincial, Regional, and municipal planning policies. The proposed use and development standards are appropriate, contemplate compatible development of lands intended to be used for this purpose, and

represent good planning and are in the public interest.

1.0
Planning Context

Nishan GTA Inc. is proposing an Official Plan Amendment and a Zoning By-law Amendment to permit the development of the Subject Lands in the Town of Caledon. This section describes the Subject Lands and the surrounding land use and development context.

1.1 Introduction

Malone Given Parsons Ltd. are the land use planners for Nishan GTA Inc., the owner of 12434 Dixie Road (the "Subject Lands") in the Town of Caledon.

Nishan GTA Inc. is proposing to develop the Subject Lands with a cross-dock industrial facility consisting of an warehouse building, a truck wash, and a stormwater management pond as well as to convert existing buildings on the Subject Lands to offices. The proposed development will contribute to the supply of industrial uses and jobs available in the Town. A detailed description of the proposed development is provided in Section 2.0 of this report.

This Planning Opinion Report is submitted to accompany the following application:

- An Official Plan Amendment ("OPA") to the Town of Caledon Official Plan to redesignate the Subject Lands to General Employment with a Goods Movement District overlay and Natural Features and Areas and add site-specific policies.
- A Zoning By-law Amendment ("ZBA") to the Town of Caledon Zoning By-law 2006-50 to rezone the Subject Lands Serviced Industrial and Environmental Protection Area to implement the permissions of the proposed designation and add site-specific exceptions.

1.2 Site Location

The lands are comprised of one parcel on the west side of Dixie Road, approximately 1.3 km north of Mayfield Road. The Subject Lands are 10.7 hectares (26.4 ac) with approximately 140 m of frontage on Dixie Road. The Subject Lands are located approximately 2 km, or a 2-minute drive, south of the Highway 410 interchange, and approximately 2 to 3 km from the future planned GTA West Corridor. The Subject Lands are accessed via a shared driveway from Dixie Road, used in common with the adjacent UPS facility to the south.

The lands are currently used for truck and trailer parking purposes. Existing structures on the property include a single detached dwelling, used for ancillary office purposes, along with a shed and farm-related structures. Kilmanagh Creek, a tributary of the West Humber River, and its associated valleyland traverse the northeastern portion of the Subject Lands, with an unevaluated wetland also present at the northern corner of the property. A significant woodland is located on adjacent lands to the west of the Subject Lands, with its dripline extending onto the southwest corner of the property.

Figure 1: Subject Lands



Source: Town of Caledon (2024), MGP (2026)

Table 1.1 Legal Description of Subject Lands

#	Party to:	Legal Description	Municipal Address	Size (ha)
1	10144789 Canada Inc.	PT LT 20 CON 3 EHS CHINGUACOUSY PTS 1, 2 & 3, 43R2380, EXCEPT PT 18, 43R20345 -"EXCLUDING PT 1, 43R20758 LYING WITHIN THE LIMITS	12434 Dixie Rd.	10.7 (26.4 ac)

		OF PT 18"; S/T RO1081724; CALEDON "ADDED 99/08/30 BY C. COOPER" **PIN: 142350704**		

1.3 Surrounding Land Use

The following summarizes the uses immediately adjacent to the Subject Lands:

To the north:

- Mayfield United Church
- Landscaping/Snow Removal business
- Agricultural Uses

To the east:

- Agricultural Uses
- Garden supply business

To the south:

- Shipping company facility (UPS)
- Industrial Uses

To the west:

- Agricultural Uses

Beyond the neighbouring lands, there are industrial, commercial, and residential uses to the south on both sides of Dixie Road including an industrial equipment supplier facility.

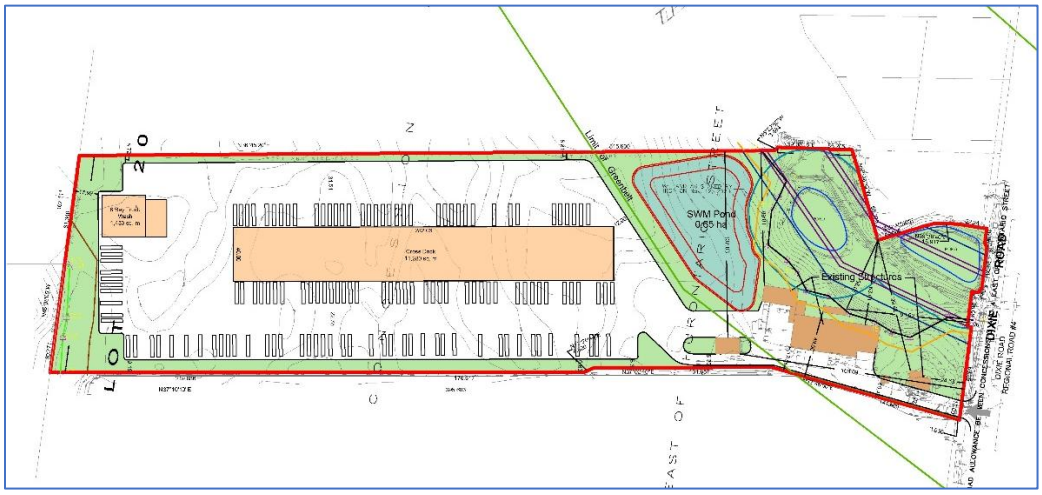
2.0
The Proposed Development

This section summarizes the proposed development.

2.1 Development Proposal

The proposed full build-out of the Subject Lands consists of a new cross-dock facility of approximately 11,000 square metres, positioned on the western portion of the site along with a truck wash, and landscape buffers along the property lines. Access to the site is provided from Dixie Road. Office uses will be accommodated within the existing detached dwelling, and the existing sheds and barn will continue to serve cross-dock and storage functions, both in the interim and as part of the full build-out.

Figure 2: Conceptual Site Plan for Full Build-Out



Supporting infrastructure is planned to accommodate the facility's operations, including a stormwater management ("SWM") pond located on the eastern portion of the Subject Lands, near the site access and existing structures. The natural heritage area, including two waterbodies and a watercourse, is located within the northeastern portion of the site and is proposed to be retained and protected as part of the design.

This site plan also illustrates surface parking areas, including dedicated trailer parking and employee parking (108), with access and circulation designed to support the industrial use.

The owners anticipate that the proposed development will accommodate about 100 employees on-site in the first few years.

2.2 Temporary Use

It should be noted that an application for a Temporary Use By-law Amendment was submitted for truck parking on the Subject Lands (Town File No.: RZ 2021 0010). The original application was submitted in March 2022, and comments were received from the Town and agencies. Since the original submission, the Subject Lands are now located within the Region's and Town's Urban Boundary and are designated New Employment Area under the Future Caledon Official Plan. Revised materials have been submitted concurrently with the OPA and ZBA applications to address the comments received.

3.0
Development Considerations

This section provides a summary of the technical studies completed for the proposed redevelopment.

The following section provides a brief overview of the studies that have been prepared in support of the proposed redevelopment. Reference to the original studies should be made for full details.

3.1 Environmental Impact Study/Natural Heritage Evaluation

An Environmental Impact Study/Natural Heritage Evaluation was prepared by Beacon Environmental Limited, dated August 2026, to assess the natural heritage and hydrologic features associated with the Subject Lands and the potential impacts of the proposed commercial vehicle cross-dock facility. The assessment identifies Kilmanagh Creek and its associated valleyland, wetlands, fish habitat including critical habitat for Redside Dace, and the significant woodland at the southwest corner of the Subject Lands as the principal natural heritage constraints. Habitat for Barn Swallow is also associated with several existing buildings, while potential maternity roost habitat for endangered bats is associated with the woodland within the Kilmanagh Creek valleyland.

The proposed development has been designed to avoid these features and their associated setbacks. A 30-metre vegetation protection zone is provided to wetland and aquatic features, a 10-metre setback is provided from the staked top of valley slope and contiguous vegetation, and a 20-metre buffer is provided to the significant woodland. The proposed stormwater management pond is located outside the applicable natural heritage feature setbacks, while the stormwater outfall is located within the Kilmanagh Creek valleyland but outside Redside Dace critical habitat. The two Headwater Drainage Features identified on the Subject Lands were assessed as requiring No Management Required, meaning they may be removed without mitigation. HDF-1 will remain post-development, while HDF-2 was no longer evident during the 2026 field investigations.

The EIS recommends maintaining the required buffers and setbacks, implementing appropriate stormwater management and erosion and sediment controls, undertaking vegetation removal outside the bird nesting period, and completing restoration planting within applicable buffer areas.

The assessment concludes that the proposed development will not adversely affect the natural heritage features or ecological functions associated with the Subject Lands, provided the recommended mitigation measures and companion study recommendations are implemented.

3.2 Transportation Impact Study

A Transportation Impact Study was prepared by NexTrans Consulting Engineers, dated August 2026, in support of the proposed truck parking and transportation depot development at 12434 Dixie Road. The study assesses both an interim condition maintaining the existing truck and trailer parking operation with 115 vehicle parking spaces and an ultimate condition consisting of an ~11,000m² transportation depot incorporating a cross-dock facility and a 1,433 m² six-bay truck wash facility, while retaining truck and trailer parking on the remainder of the site with 108 vehicle parking spaces.

The study forecasts 36 two-way site trips during the weekday AM peak hour and 50 two-way trips during the weekday PM peak hour under the ultimate condition, with traffic volumes generally consistent with the existing site operation. Existing conditions and the 2038 Future Total conditions are forecast to operate with acceptable levels of service, residual capacity, and manageable delays and queues. The operational deficiency identified at the Mayfield Road/Dixie Road intersection under the 2033 Future Background scenario is attributed to the interim roadway network rather than the proposed development and is addressed through the Region of Peel's planned roadway improvements to Dixie Road and Mayfield Road.

The existing full-movement access on Dixie Road is considered appropriate given the site's physical constraints, low forecast traffic volumes and acceptable operational performance. Although the access does not meet the Region's recommended spacing criteria, the sight distance assessment confirms that stopping and departure sight distances exceed the minimum TAC requirements. AutoTURN also confirms that the site layout can safely accommodate the design vehicle.

NexTrans concludes that the proposed development is expected to operate safely and efficiently and can be supported from a transportation perspective.

3.3 Functional Servicing and Stage 1 Stormwater Management Report

A Functional Servicing and Stage 1 Stormwater Management Report was prepared by Masongsong Associates Engineering Limited, issued for submission in August 2026, to evaluate the proposed servicing, storm drainage, grading and stormwater management strategy for the current development and its future redevelopment. The report notes that the current application does not include permanent buildings requiring municipal water or sanitary servicing; storm servicing is therefore provided through a conventional gravity storm sewer system that conveys runoff to a centralized Stormwater Management (SWM) Pond, while the long-term servicing strategy is intended to remain

adaptable to future redevelopment.

Hydrologic and hydraulic modelling using Personal Computer Storm Water Management Model confirms that the proposed SWM Pond and outlet control provide sufficient detention storage to satisfy TRCA quantity control criteria for Humber River Sub-basin 36. The pond provides approximately 4,828 m³ of active storage, maintains approximately 0.52 m of freeboard during the critical design event, and uses approximately 67% of the available storage during the 100-year design storm. The design also includes approximately 1,666 m³ of extended detention volume. Stormwater quality treatment is provided through an Oil Grit Separator and the permanent pool within the SWM Pond, with a minimum 80% Total Suspended Solids removal target and thermal mitigation for Redside Dace habitat.

The report also provides for the required 5 mm water balance through storage within the SWM Pond and an infiltration gallery, recognizing the low infiltration potential of the native soils. The grading and drainage system is designed to safely convey minor and major storm flows while maintaining the overall drainage pattern, and erosion and sediment control measures are specified for construction.

Overall, the report demonstrates that the proposed development can be serviced and that the proposed stormwater management system can satisfy the applicable municipal and TRCA requirements, with detailed servicing for future redevelopment to be refined through a subsequent application.

3.4 Cultural Heritage Impact Assessment and Addendum

A Cultural Heritage Impact Assessment (CHIA) was prepared by A.S.I., dated March 2022, to evaluate the cultural heritage value of the property at 12434 Dixie Road and assess the potential impacts of the proposed development. The property is listed on the Town of Caledon's Heritage Register and contains a two-storey Edwardian Classical residence, five outbuildings, a graded parking area, two ponds and agricultural lands. The CHIA determined that the property meets the criteria in Ontario Regulation 9/06 and therefore has cultural heritage value or interest and merits consideration for designation under Part IV of the Ontario Heritage Act.

The CHIA identified design and physical value associated with the Edwardian Classical farmhouse and its rusticated concrete block construction, historical and associative value through the Speirs family's long-standing connection to the property and Mayfield community, and contextual value through the property's relationship with the adjacent Mayfield United Church and cemetery. The proposed development will affect the property, but the existing structures will not be directly impacted and the property's cultural heritage value is not anticipated to be lost or significantly compromised. The adjacent listed heritage property is also not anticipated to be directly or indirectly impacted, with existing vegetation screening potential views from the cemetery.

An Addendum was subsequently prepared by A.S.I. in response to Town of Caledon heritage comments dated October 26, 2022 and February 12, 2026. The Addendum provides a more fulsome record of the site's five outbuildings, confirming they are of no heritage concern: based on historical mapping and aerial photographs, the outbuildings are not contemporaneous with the house, are utilitarian in nature, and lack a high degree of craftsmanship or artistic merit. A small outbuilding visible in earlier aerial imagery was likely removed between 2020 and 2021 and is no longer extant. The Addendum also updates the property's heritage attributes to align with current Ontario Heritage Act requirements, identifying the rusticated concrete block exterior, concrete lintels and sills, wood frame windows, stone foundation, verandah and entranceway, decorative wooden brackets, the "Glenoro 1908" dateplate, and the natural topography to the east and north of the house. In response to newly identified historical information, the Addendum incorporates White and Proctor, the locally prominent builders who constructed the residence, into the historical and associative value assessment.

Together, the CHIA and Addendum confirm that the property's cultural heritage value or interest is related to the Speirs House and the natural topography to its east and north, while the five extant outbuildings are not considered heritage concerns. Recommendations include designing acoustic barriers to be sympathetic to the agricultural setting, considering vibration monitoring where excavation or construction methods may create a risk to the house, and carefully planning construction staging to avoid impacts to cultural heritage resources.

3.5 Geotechnical Investigation

A Geotechnical Investigation was prepared by Soil Engineers Ltd., dated November 23, 2020, to assess the subsurface conditions of the Subject Lands and provide recommendations for the proposed truck and trailer parking facility. The investigation included eleven boreholes advanced to depths of approximately 3.3 to 3.5 meters. The investigation identified approximately 0.18 to 0.25 meters of topsoil, underlain by earth fill extending to depths of approximately 0.5 to 1.4 meters, with native sandy silt till below. The sandy silt till was generally compact to very dense and was identified as having low permeability and fair pavement-supporting characteristics. No free groundwater was encountered within the depth of investigation.

The report provides recommendations for site preparation, underground services, backfilling, grading and pavement construction. Topsoil, vegetation and organic material are to be removed, and the exposed subgrade is to be inspected and proof-rolled prior to regrading or placement of fill. For a gravel truck and trailer parking area, the report recommends a minimum 200 mm layer of 20 mm crusher run limestone over 300 mm of 50 mm crusher run limestone, separated from the subgrade by an appropriate

geotextile or geogrid.

The report also recommends appropriate grading and drainage measures to prevent water from ponding on the pavement subgrade.

3.6 Agricultural Impact Assessment

An Agricultural Impact Assessment was prepared by Beacon Environmental Limited, dated December 2020, to assess the agricultural capability of the Subject Lands and potential impacts of the proposed development on agricultural resources and surrounding farm operations. Although the Town of Caledon Official Plan identifies the Subject Lands as a Prime Agricultural Area, the assessment concluded, based on the 2016 Land Evaluation and Area Review (LEAR) study and site-specific investigations, that the Subject Lands should not be classified as a Prime Agricultural Area. The Subject Lands received a LEAR score of 492, below the Town's recommended threshold of 535, and the score would be further reduced to 484 based on the adjacent distribution warehouse development.

The assessment identified the Subject Lands as a lower-priority agricultural area due to the existing land use, the portion of the property that is not currently cultivated, and the limited capital investment in agricultural infrastructure. While the site-specific soil investigation identified Class 1 soils with no limitations, the assessment found no recent or significant agricultural infrastructure or investment that would be impacted by the proposed development. The report recommends an appropriate soil handling and stripping protocol, including removal and stockpiling of the upper approximately 15 centimetres of topsoil, to protect soil resources during site development.

Subject to the recommended agricultural soil management measures and any required approvals and permits, Beacon concluded that the proposed development can proceed in a manner consistent with the applicable provincial, Regional and Town agricultural policies and regulations.

3.7 Geomorphic Assessment

A Geomorphic Assessment was prepared by Beacon Environmental Limited, dated April 2021, to delineate the meander belt and Redside Dace regulated habitat associated with Kilmanagh Creek, which traverses the northeast portion of the Subject Lands. The assessment characterized Reach KC-1 of Kilmanagh Creek as a well-defined, moderately sinuous channel within an unconfined valley system. Historical and recent aerial imagery identified previous channelization west of Dixie Road, as well as several offline ponds adjacent to the creek. Field investigations found the reach to have a low gradient, moderate entrenchment, and fragmented riparian vegetation. The Rapid Geomorphic Assessment classified Reach KC-1 as stable or “in regime” with a score of 0.19, with minor evidence of widening and aggradation, while the Rapid Stream Assessment Technique identified a “good” degree of overall ecological health, with riparian habitat conditions identified as the primary limiting factor.

The meander belt for Reach KC-1 was delineated based on the outermost extent of the meander bends identified through current and historical channel planform. A preliminary meander belt width of 35 metres was established and reviewed against topographic mapping and field observations to ensure that it captured the active channel and evidence of historical lateral occupation. A 20 percent factor of safety was then applied to account for potential long-term channel erosion, migration, changes in channel form and potential changes in hydrologic conditions, resulting in a recommended 42-metre meander belt. For the purposes of identifying regulated Redside Dace habitat under Ontario Regulation 242/08, a 30-metre setback was applied to the preliminary 35-metre meander belt.

The findings were determined to conform with the Provincial Policy Statement, Region of Peel Official Plan, Town of Caledon Official Plan, Ontario Regulation 166/06, the TRCA Belt Width Delineation Procedures and Ontario Regulation 242/08.

3.8 Environmental Noise Impact Study

An Environmental Noise Impact Study was prepared by Aercoustics Engineering Limited, dated December 2021, to assess potential noise impacts associated with the proposed transport truck and trailer parking facility at 12434 Dixie Road. The assessment considered noise from on-site truck movements and trailer coupling and uncoupling activities at five surrounding noise-sensitive receptors. The study was completed in accordance with the Ministry of the Environment, Conservation and Parks (MECP) NPC-300 noise guidelines, with the Subject Lands and surrounding receptors characterized as a Class 2 area.

The assessment identified an exceedance at one receptor under unmitigated conditions and therefore recommends a 4-metre-high acoustic barrier, which has been incorporated into the site plan. With the acoustic barrier in place, predicted steady noise levels from truck movements range from 38 to 47 dBA during the daytime and 39 to 43 dBA during the nighttime, below the applicable MECP limits at all receptors. Predicted impulse noise from trailer coupling and uncoupling also complies with the applicable limits, with levels ranging from 43 to 49 dBAI during the daytime and 44 to 48 dBAI during the nighttime.

Overall, the study concludes that, with the recommended 4-metre acoustic barrier in place, the proposed facility is expected to comply with the applicable MECP sound level limits at the surrounding noise-sensitive receptors.

4.0
Planning Policy Context

This section of the report addresses applicable Provincial, Regional, and local planning documents. Pertinent policies addressed herein relate to employment, natural heritage, and parkland dedication requirements.

This section of the report provides an analysis of the proposed redevelopment on the Subject Lands in the context of the following Provincial, County, and Municipal documents:

- Provincial Planning Statement (2024) ("PPS 2024");
- Peel Region Official Plan (June 2024 Consolidation); and,
- Town Caledon Official Plan (October 2025)
- Town of Caledon Zoning By-law 2006-50

4.1 Planning Policy Considerations

This section analyzes consistency and conformity of the proposed development with regard to major planning matters and the related policies that require specific attention and explanation. The following section addresses matters such as employment lands, the preservation of the natural heritage features and parkland dedication. Other applicable policies within Provincial, Regional, and local planning documents have been reviewed, and we have concluded that the proposed development is consistent with or conforms to these policies. Further discussion and overall opinions are provided in the following sections.

4.1.1 Employment

The PPS 2024 provides policy direction on planning for economic development and employment lands. In particular, Policy 2.8.1.1 requires planning authorities to promote economic development and competitiveness by providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs, providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses, and identifying strategic sites for investment.

Employment areas shall be planned for, protected, and preserved, particularly in

proximity to major goods movement facilities and corridors (Policies 2.8.2.1 and 2.8.2.2). Planning authorities shall designate, protect, and plan for all employment areas in settlement areas by:

a) *"planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
b) *prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
c) *prohibiting retail and office uses that are not associated with the primary employment use;*
d) *prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*
e) *including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability"* (Policy 2.8.2.3).

Similarly, the policies of the ROP require the designation and protecting of existing and future Employment Areas to meet the long-term market demands and locational requirements of a diverse range of employment sectors and uses, including Employment Land adjacent to and in proximity to major goods movement facilities and corridors (Policy 5.8.15, 5.8.26, 5.8.28).

The Future Caledon OP identifies Employment Areas as places of business and economic activity intended to provide industrial, business, manufacturing, warehousing, goods movement, and ancillary activities as the Town's major source of employment opportunities (Chapter 23, General). The Subject Lands are designated New Employment Area, protected and planned for long-term employment uses of this nature.

The proposed development provides an employment opportunity on lands designated for employment uses, in proximity to Highway 410, a major goods movement corridor, located approximately 2 km to the south, as well as the future planned GTA West Corridor, located approximately 2 to 3 km from the Subject Lands. No prohibited uses are proposed, as the office use within the existing dwelling is accessory to the primary cross-dock and warehousing use.

In our opinion, the proposed cross-dock and logistics/warehousing use is consistent with the PPS 2024 and conforms to the applicable ROP and Future Caledon OP policies for the protection and development of Employment Areas.

4.1.2 Natural Heritage Matters

The PPS 2024 provides policy direction on matters of natural heritage features and systems. Natural features and areas are to be protected over the long term (Policy 4.1.1), and the diversity, connectivity, and long-term ecological function of natural heritage systems are to be maintained, restored, or improved where possible (Policy 4.1.2).

Development and site alteration are generally not permitted within significant wetlands, significant woodlands, significant valleylands, significant wildlife habitat, areas of natural and scientific interest, fish habitat, and habitat of endangered and threatened species (Policies 4.1.4–4.1.7). Development and site alteration on lands adjacent to these features is not permitted unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions (Policy 4.1.8).

The ROP implements this direction through the Greenlands System, intended to identify, protect, restore, and enhance the long-term ecological function and biodiversity of the Region's natural heritage features, and to maintain and improve linkages between them (Policies 2.14.1, 2.14.2). Development and site alteration within the Greenlands System is only permitted in accordance with the policies of the ROP (Policy 2.14.7). The ROP directs the local municipalities to apply a systems approach to implementing the Greenlands System, including by including policies in their official plans that do not permit development or site alteration on adjacent lands to Core Areas of the Greenlands System unless the ecological function of the adjacent lands has been evaluated and no negative impacts are demonstrated, and by requiring proponents of development within or adjacent to the Greenlands System to prepare an environmental impact study to inventory and refine feature boundaries, establish development limits, assess potential impacts, and identify avoidance, minimization, and mitigation measures (Policy 2.14.39(c), (e)). Refinements to the boundaries of the Greenlands System shown on Schedule C-1, made in accordance with the policies of the ROP and applicable provincial plans, do not require an amendment to the ROP, and local official plans may incorporate such refinements to reflect local natural heritage systems and refinements made through approved development applications (Policy 2.14.10).

The Future Caledon OP implements the ROP's Greenlands System locally through the Natural Features and Areas designation, which corresponds to the Core Areas of the Greenlands System and is shown on Schedule D1 and Schedule D3 (Policy 13.3.1). Development and site alteration within the Natural Features and Areas designation is generally not permitted, subject to limited exceptions including existing uses, buildings, and structures, and accessory uses, buildings, and structures (Policy 13.3.3). A proposal for development or site alteration adjacent to a feature within the Natural Features and Areas designation requires an environmental impact study and/or hydrologic evaluation demonstrating no negative impacts, in accordance with the adjacent lands distances set out in Table 13-1, which range from 50 metres for significant valleylands to 120 metres for significant woodlands and provincially significant wetlands (Policy 13.3.6).

The Subject Lands contain the Kilmanagh Creek, a tributary of the West Humber River, and its associated valleyland traverse the northeastern portion of the Subject Lands, together with an unevaluated wetland at the northern corner of the property. This area forms part of the Greenbelt Plan's Natural Heritage System. In addition, a significant woodland is located on adjacent lands to the west of the Subject Lands, with its dripline extending onto the southwest corner of the property.

The conceptual site plan has been designed to retain and protect these features by concentrating the proposed building, truck wash, and associated infrastructure on the western and southeastern portions of the site, away from the identified natural heritage area.

The Environmental Impact Study/Natural Heritage Evaluation prepared by Beacon Environmental (2026) confirms that the proposed development avoids direct impacts on both features. The proposed stormwater management pond is sited outside all key natural heritage features, key hydrologic features, and their associated minimum vegetation protection zones, and a stormwater outfall connecting to Kilmanagh Creek has been designed to avoid critical habitat for Redside Dace. A 20-metre buffer has been applied to the significant woodland to the west, consistent with Table 13-3 of the FCOP, and no direct impacts on this feature are anticipated. Existing buildings proposed for continued use within the Greenbelt Natural Heritage System are long-established structures that will not expand into any key natural heritage feature or its associated buffer.

In our opinion, the proposed development is consistent with the PPS 2024 and conforms to the applicable ROP and Future Caledon OP natural heritage policies.

4.1.3 Parkland Dedication Requirements

The *Planning Act* provides that the council of a local municipality may require the conveyance of land for park or other public recreational purposes as a condition of development at a rate of 2 percent for commercial and industrial uses and 5 percent in all other cases, such as residential land uses (Section 42(1)).

The Future Caledon OP requires the conveyance of land to the Town for park or other recreational purposes as a condition of development, consent, or the subdivision of land in accordance with the provisions of the *Planning Act* (Policy 26.2.3 a)). The Town will not accept Natural Environment System lands, including lands designated Natural Features and Areas, valley lands, wetlands, and natural ponds, as part of a parkland conveyance (Policy 26.2.5(a)). As per Policy 26.2.4 a), cash-in-lieu of parkland may be required in the following circumstances:

i. "*where the application of the rate of parkland required to be conveyed would render the remaining portion of the development site unsuitable or impractical for development;*
ii. *where the amount of parkland would be insufficient to accommodate the development of a desirable range of recreation facilities;*
iii. *where existing municipal parkland is available in sufficient quantity and quality to accommodate further development in an area;*
iv. *where more suitable parcels of land are available for municipal park purposes; and,*

v. *under other circumstances identified by Council."*

The Subject Lands total approximately 10.7 hectares in size, of which approximately 3.65 hectares comprise the Natural Features and Areas designation, which is to be retained and protected, leaving a gross developable area of approximately 7.05 hectares proposed for the cross-dock facility, truck wash, and associated infrastructure. Applying the 2 percent industrial rate under s. 42(1) of the *Planning Act* to the gross developable area, the Subject Lands would generate a parkland dedication requirement of approximately 0.14 hectares (0.35 acres). Given the industrial context of the Subject Lands, it is our opinion that parkland dedication would be more appropriately satisfied through a cash-in-lieu payment, in accordance with the *Planning Act* and the policies of the Future Caledon OP.

4.2 Policy Analysis

4.2.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024, was introduced on October 20th, 2024, and with it, a simplified and more locally responsive planning document for municipalities. The PPS 2024 replaces both the *Provincial Policy Statement*, 2020, and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*, 2019.

The PPS 2024 is a streamlined province-wide land use planning policy framework that provides municipalities with the tools and flexibility they need to build more homes. The PPS 2024 enables municipalities to plan for and support development and increase the housing supply across the province; align development with infrastructure to build a strong and competitive economy that is investment-ready; foster the long-term viability of rural areas; and protect agricultural lands, the environment, public health, and safety. Under the Planning Act, planning decisions must be consistent with the policies of the PPS 2024.

Settlement areas shall be the focus of growth and development (Policy 2.3.1.1), and land use patterns within settlement areas should be based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure, and support active transportation, transit, and freight movement (Policy 2.3.1.2). The proposed cross-dock and logistics/warehousing use represents the type of freight-supportive use contemplated by Policy 2.3.1.2(e), and its location within the settlement area, in proximity to Highway 410 and the future GTA West Corridor, is consistent with directing this form of growth to the settlement area.

Planning authorities are encouraged to establish density targets for designated growth areas, with large and fast-growing municipalities encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas (Policy 2.3.1.5). This is a blended, area-wide target contemplating a mix of residential and employment growth across a designated growth area, rather than a per-site requirement for an individual employment use. Based on an anticipated 100 employees on a gross developable area of

approximately 7.05 hectares, the proposed development is expected to achieve a density of approximately 14 jobs per hectare, which is an appropriate density for an employment use of this nature, consistent with the density achievable by warehousing and logistics uses following the Province's redefinition of employment areas.

The PPS 2024 directs planning authorities to promote economic development and competitiveness by providing an appropriate mix and range of employment uses, providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses, and identifying strategic sites for investment (Policy 2.8.1.1). The proposed development identifies a strategic site for investment in a growing logistics and warehousing sector, consistent with Policy 2.8.1.1(c), and contributes to a diversified economic base for the area, consistent with Policy 2.8.1.1(b).

In our opinion, the proposed development is consistent with the settlement area and employment policies of the PPS 2024.

4.3 Greenbelt Plan

The Greenbelt Plan 2017 ("Greenbelt Plan ") identifies where urbanization should be limited in order to provide permanent protection to the agricultural land base and the ecological and hydrological features and functions occurring on the landscape within the Greater Golden Horseshoe. In addition to protecting natural heritage and agricultural resource systems, the Greenbelt Plan supports the conservation of cultural heritage resources and provides a range of publicly accessible lands for recreation and tourism development.

The northeast portion of the Subject Lands is identified within the Greenbelt. This portion of the Subject Site is designated "Protected Countryside" with a "Natural Heritage System" overlay. The Natural Heritage System overlay includes core areas and linkage areas of the Protected Countryside with the highest concentration of sensitive and/or significant natural features and functions. These areas build upon the surrounding natural systems to create a connected natural heritage system. Permitted uses in the Natural Heritage System include a full range of existing and new agricultural uses (Section 3.2.2.2), as well as existing, expanded or new infrastructure that is approved under the *Environmental Assessment Act* or the *Planning Act* (Section 4.2.1.1).

Stormwater Management Infrastructure

New development or site alteration in the Protected Countryside - Natural Heritage System is required to demonstrate that no negative impacts on key natural heritage features or key hydrologic features or their functions will occur (Section 3.2.2.4.a). A proposal for new development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System or a key hydrologic feature anywhere within the Protected Countryside requires a natural heritage evaluation to

demonstrate the required vegetative protection zone and that no adverse impacts are anticipated (Section 3.2.5.5). In the case of wetlands, seepage areas and springs, fish habitat, permanent and intermittent streams, lakes and significant woodlands, the minimum vegetation protection zone shall be a minimum of 30 metres measured from the outside boundary of the key natural heritage feature or key hydrologic feature (Section 3.2.5.4).

Existing, expanded and new infrastructure is permitted within the Greenbelt Plan Area provided it serves the significant growth and economic development expected in southern Ontario beyond the Greenbelt by providing for the appropriate infrastructure connections among urban centres and between these centres and Ontario's borders (Section 4.2.1.l(b)). Infrastructure is defined to be *"physical structures (facilities and corridors) that form the foundation for development. Infrastructure includes: sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications, transit and transportation corridors and facilities, oil and gas pipelines and associated facilities."*

Stormwater management infrastructure is permitted within the Greenbelt Plan Area. Stormwater management facilities are prohibited in key natural heritage features, key hydrologic features and their associated vegetation protection zones (Section 4.2.3.3). The proposal does not include any new buildings on the lands within the Greenbelt.

The proposal locates a stormwater management facility within the Greenbelt Plan Area but outside key natural heritage features. As demonstrated in the Natural Heritage Evaluation prepared by Beacon Environmental, the proposed infrastructure does not have an adverse impact to the natural heritage features and their ecological functions.

Moreover, the stormwater management facilities serves the significant growth that is planned outside the Greenbelt, specifically in the Town of Caledon. The remainder of the Subject Lands within the Greenbelt is proposed to be maintained as part of the natural system.

<u>Existing Buildings</u>

Section 3.1.3 of the Greenbelt Plan establishes policies for lands falling within prime agricultural areas of the Protected Countryside. Non-agricultural uses may be permitted subject to the policies of sections 4.1 to 4.6, generally following the completion of an agricultural impact assessment (Section 3.1.3.3). Lands shall not be redesignated for non-agricultural uses, except for refinements to the prime agricultural area and rural lands designations.

Beacon Environmental prepared an Agricultural Impact Assessment (dated March 2021) in support of this application. The AIA confirmed that the LEAR score for the Subject Lands falls below the threshold of 535 required for lands to be identified as Prime Agricultural Area.

The Prime Agricultural Area designation (via the Greenbelt Plan) on the Subject Lands predates a significant change in the surrounding planning context, where through the Region of Peel's Settlement Area Boundary Expansion (SABE) exercise, the surrounding lands were brought within the Region's Urban Boundary and designated for future employment uses. The Subject Lands are now surrounded on all sides by lands that are either already developed for employment use or designated for future employment use, including the existing UPS distribution facility to the south and New Employment Area designated lands to the north, west, and east. As a result of this settlement area expansion, the Subject Lands, and the Prime Agricultural Area designation applying to a portion of them, are no longer part of a continuous and productive agricultural land base extending beyond the Subject Lands, but instead are effectively surrounded by, and isolated within, urban employment lands. The Subject Lands cannot function as part of a continuous and productive agricultural land base in this context. The AIA provides the assessment required under Policy 3.1.3(3). The Subject Lands are accordingly not considered prime agricultural lands for the purposes of the Greenbelt Plan. As the Subject Lands do not meet the criteria for Prime Agricultural Area, this portion of the Subject Lands is more appropriately within the rural lands component of the Agricultural System. Rural lands support and provide the primary locations for a range of recreational, tourism, institutional, and resource-based commercial and industrial uses.

Section 4.5 of the Greenbelt Plan establishes that all existing uses are permitted within the Protected Countryside. Policy 4.5(4) further provides that conversions of legally existing uses which bring the use more into conformity with this Plan are permitted, subject to demonstration that:

- new municipal services are not required; and
- the use does not expand into key natural heritage features or key hydrologic features or their associated vegetation protection zones.

The existing barn structure and dwelling on the Subject Lands were legally established in connection with the prior agricultural use of the property. The proposed development involves the conversion of these structures, the barn for storage and cross-docking ancillary to the truck and trailer parking operation, and the dwelling for ancillary office use. There is no expansion of the existing building footprints and no new buildings or structures are proposed. No new municipal water or sanitary services are required as part of the proposed temporary use, satisfying the condition in Policy 4.5(4)(a). The existing structures do not expand into the key natural heritage features, key hydrologic features and their associated vegetation protection zones, satisfying the condition in Policy 4.5(4)(b).

In summary, this portion of the Subject Lands are rural lands, not Prime Agricultural Area, and the continued use of the existing structures for storage, cross-dock, and transportation purposes satisfies both conditions of Policy 4.5(4) of the Greenbelt Plan. The proposed conversion does not expand the footprint of any existing building, does not introduce any new structures, does not require new municipal services, and does not expand into key natural heritage features, key hydrologic features or their

associated vegetation protection zones. The existing buildings can therefore be used for rural uses including the proposed transportation use and ancillary office space.

The proposed development is therefore consistent with the Existing Uses policies of the Greenbelt Plan.

Summary

The Proposed Development conforms with the Greenbelt Plan as all proposed infrastructure satisfies the criteria provided in the Greenbelt Plan and is located outside of key natural heritage and key hydrologic features.

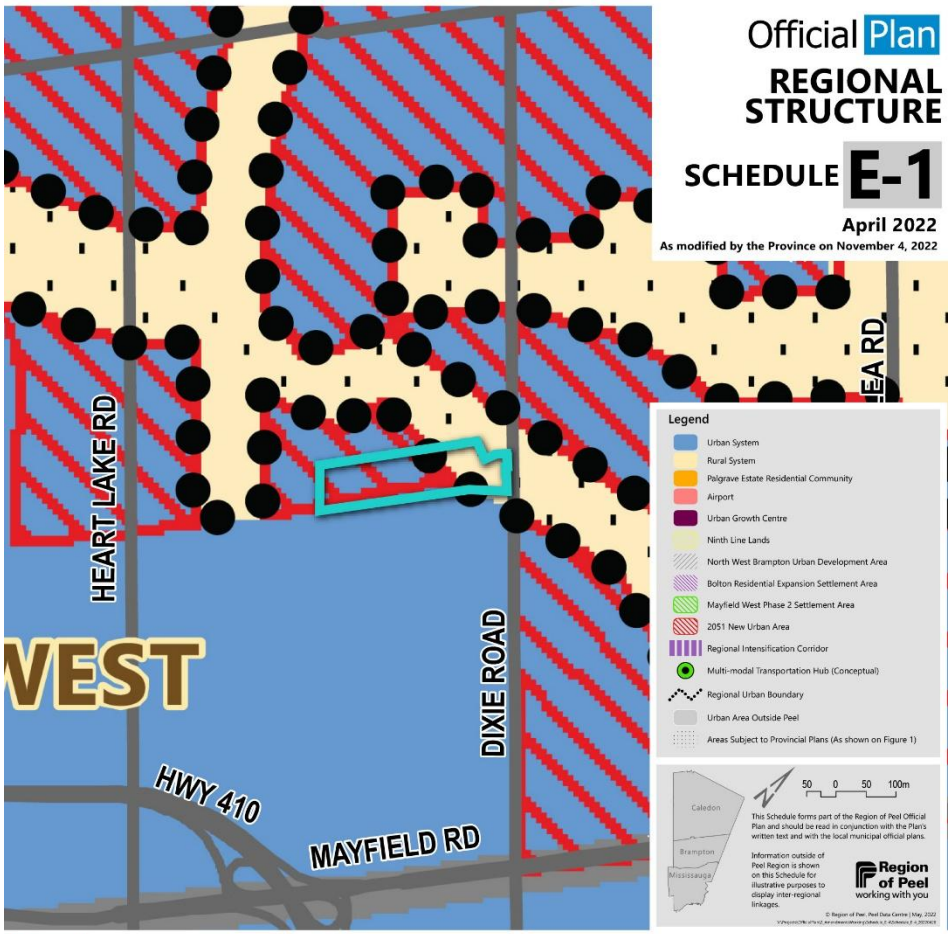
4.4 Peel Region Official Plan

The Region of Peel Official Plan ("ROP") was adopted by Regional Council on April 28, 2022, and approved by the Minister of Municipal Affairs and Housing with 44 modifications on November 4, 2022. On December 6, 2023, Bill 150, the Planning Statute Law Amendment Act, 2023, reversed most of these modifications, retaining nine. On May 16, 2024, Bill 162, the Get It Done Act, 2024, received Royal Assent and reinstated a further set of modifications to the ROP. As of July 1, 2024, the Region of Peel was designated an upper-tier municipality without planning responsibilities under the Planning Act, and the local municipalities, including the Town of Caledon, became responsible for the administration of the ROP.

The goals of ROP include the creation of healthy, resilient, equitable and sustainable regional communities, recognizing, respecting, preserving and enhancing the importance of ecosystem features, function and linkages, ensuring resiliency to climate change, recognizing the importance of a vital, competitive and diverse economy, and supporting sustainable growth and development (Section 1.7). According to Table 3 of RPOP 2051, Caledon is forecast to grow to 300,000 persons, 90,000 households, and 125,000 jobs by 2051. With respect to growth management, it is the policy of Regional Council to direct local municipalities to incorporate the population and employment forecasts shown in Table 3 into their official plans and that the forecasts be used to ensure the necessary infrastructure and public service facilities are in place to accommodate growth and to determine land and housing requirements (Section 4.3.12, 4.3.13, and 4.3.16).

The Subject Lands are designated “Urban System” with a “2051 New Urban Area” overlay and “Rural System” on Schedule E-1 in the ROP and as shown in Figure 14.

Figure 3: RPOP, Schedule E-1 - Regional Structure



Source: RPOP (2022), MGP (2024)

4.4.1 Urban System

The Urban System consists of all lands within the Regional Urban Boundary, including Designated Greenfield Areas and lands identified and protected as part of the natural environment and resources, among others (Section 5.6.10). Under ROP, the Subject Lands are also identified as "Designated Greenfield Area" on the Urban System areas, and the Rural System areas are "Greenbelt Area in Peel" on Schedule E-3 as shown in Figure 15.

The intent of the Urban System is to establish a complete healthy community by providing a compact built form and a mix of land uses that efficiently use land, services, infrastructure, and public finances and achieve an urban structure, form, and densities that are pedestrian-friendly and transit-supportive (Section 5.6.2, 5.6.3, 5.6.4). The Urban System is also intended to protect, restore and enhance the natural environment and conserve the resources of the Region, as well as to provide the needs of Peel's

changing age structure and allow opportunities to live in their communities as they age (Section 5.6.6 and 5.6.7). Urban development and redevelopment are directed to the Urban System and are to proceed in accordance with the growth management and phasing policies of the RPOP 2051 (Section 5.6.11 and 5.6.13). In accordance with Section 5.6.15, local municipalities are directed to include policies in their official plans that support the Urban System objectives and policies.

The proposed development provides an employment use within the Urban System that contributes to the achievement of a complete community, consistent with the intent of these policies.

4.4.2 Prime Agricultural

The Rural System portion of the Subject Lands, located at the eastern corner of the site within the Greenbelt Plan boundary, is designated Prime Agricultural on Schedule D-1 of the ROP.

The Prime Agricultural Area represents lands identified and protected for their long-term agricultural potential (Section 2.12.12.1). The redesignation of the Prime Agricultural Area for non-agricultural uses is generally prohibited, subject to limited exceptions, including refinements to the Prime Agricultural Area and Rural Lands designations in accordance with Section 5.3 of the Greenbelt Plan (Policy 2.12.12.1.2(a)). Non-agricultural uses are generally discouraged within the Prime Agricultural Area and may only be permitted subject to the satisfactory completion of an agricultural impact assessment (Policy 2.12.12.1.3).

This portion of the Subject Lands is not actively farmed and is functionally isolated from any surrounding agricultural operations, given the fully urbanized context of the surrounding lands. As such, this portion does not function as, nor contribute to, the agricultural land base or the surrounding agricultural system contemplated by the Prime Agricultural Area designation. The proposed development retains this portion of the Subject Lands in its natural state with no built development being proposed within the identified natural heritage feature or its associated buffer.

An Agricultural Impact Assessment was prepared in support of the application. The Land Evaluation and Area Review (LEAR) study (July 2016), which established the methodology used to identify Prime Agricultural Areas within the Town of Caledon, recommended a threshold score of 535 as the basis for this designation. The Subject Lands received a LEAR score of 492 under the original 2016 study, and a subsequent updated score of 522, both below the 535 threshold required to be identified as Prime Agricultural Area. The Subject Lands are also not designated by the Province as an area for specialty crops, and the soil and climate conditions required to support specialty crop production are not present within or adjacent to the Subject Lands. On this basis, the Subject Lands do not meet the criteria the Town itself applies to identify land as Prime Agricultural Area, notwithstanding the current mapped designation.

In our opinion, given the isolated and non-agricultural function of this portion of the Subject Lands, and the retention of the natural heritage feature within it, the proposed development is consistent with the intent of the Prime Agricultural Area policies of the ROP.

4.4.3 Employment

The Subject Lands are designated Employment Area on Schedule E-4 of the ROP (Policy 5.8.15), which the Region protects and supports for employment uses (Policy 5.8.26).

Employment Areas are places of business and economic activity vital to maintaining a healthy economy and accommodating future jobs, intended to accommodate a broad range of uses including manufacturing, warehousing, office, and associated retail and ancillary facilities, across geographies ranging from individual sites to nodes, corridors, and entire districts (Section 5.8, General).

The ROP's objectives for Employment Areas include providing sufficient employment lands to support a vibrant and sustainable regional economy (Policy 5.8.1); protecting Employment Areas for a range of employment uses and encouraging more intensive use of land (Policy 5.8.2); promoting sustainable development of Employment Areas (Policy 5.8.4); and providing a diverse range of employment opportunities near major infrastructure, including 400-series highways (Policy 5.8.10).

The ROP directs local municipalities to accommodate a diverse range of employment uses consistent with the locational and market requirements of those uses (Policy 5.8.19). Existing and future Employment Areas are to be protected to meet long-term market demands and locational requirements of a diverse range of employment sectors and uses, including Employment Land adjacent to and in proximity to major goods movement facilities and corridors (Policy 5.8.22). Employment Areas in Caledon are encouraged to achieve a minimum employment density of 26 jobs per hectare (Policy 5.8.26), and Employment Areas are to be planned and designed to minimize surface parking and be accessible by a range of transportation modes (Policy 5.8.46).

The proposed cross-dock and logistics/warehousing use is the type of warehousing use contemplated as part of the broad range of uses Employment Areas are intended to accommodate. The Subject Lands are well-positioned to meet the locational and market requirements of this use, given their proximity to Highway 410 and the future planned GTA West Corridor, and their adjacency to the existing UPS facility, an established logistics and warehousing use reflecting current market demand for this employment sector.

In our opinion, the proposed development is consistent with the objectives and policies of the ROP applicable to Employment Areas.

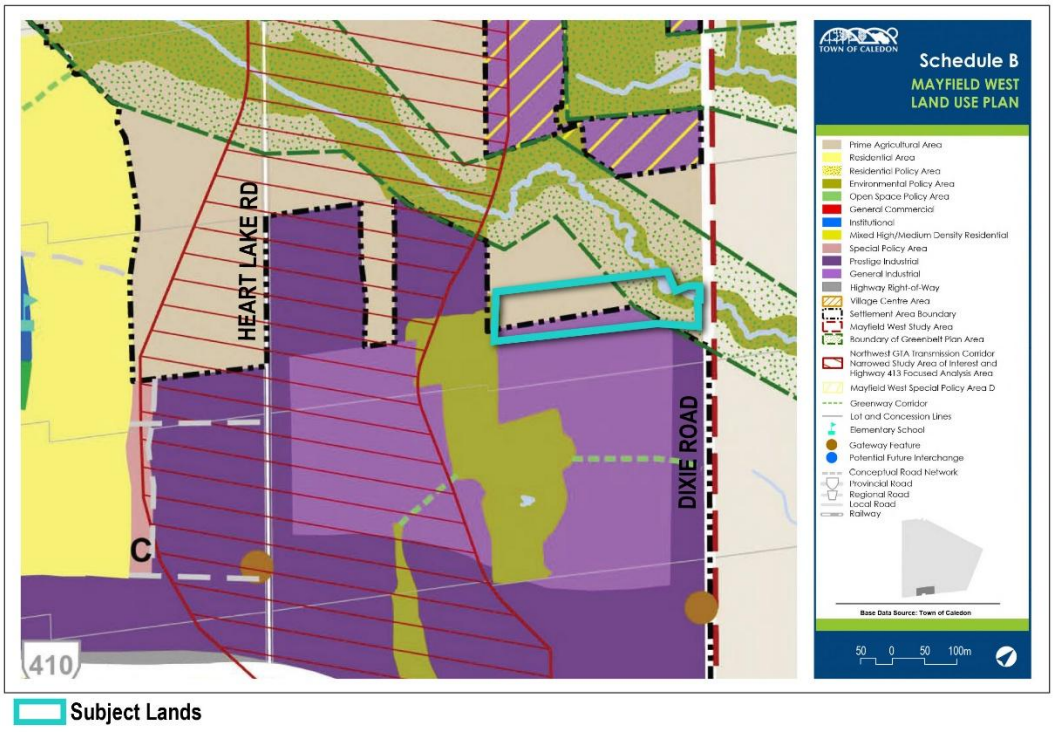
4.5 Town of Caledon Official Plans

The Subject Lands are governed by two Official Plans. The southern sliver of the Subject Lands falls within the Mayfield West Secondary Plan Area under the former (1978) Town of Caledon Official Plan, which remains in effect for this area pursuant to Policy 1.2.1 of the Future Caledon Official Plan ("FCOP"). The balance of the Subject Lands is governed by the FCOP, adopted by Council in March 2024 and approved by the Minister of Municipal Affairs and Housing, with modifications, on October 22, 2025.

4.5.1 Former Town of Caledon Official Plan

The Mayfield West Secondary Plan is one of several legacy secondary plans carried forward from the 1978 Town of Caledon Official Plan. The southern portion of the Subject Lands is designated General Industrial under the Mayfield West Land Use Plan (refer to figure below), which forms part of the 1978 Town of Caledon Official Plan and remains in effect pursuant to Policy 1.2.1 of the FCOP (Section 7.12.12.3). This portion of the Subject Lands accordingly already carries an in-force General Industrial designation. The proposed Official Plan Amendment, discussed further in Section 5.0, essentially extends this existing designation to the balance of the Subject Lands to the north.

Figure 4: Mayfield West Land Use Plan Excerpt



The General Industrial designation applies to employment lands developed for industrial uses on full piped Regional sewer and water services (Section 5.5.5). Permitted uses include manufacturing, fabricating, processing, and packaging operations; warehousing and wholesale operations; transportation terminals; contractor's yards; offices related to

industrial uses; accessory outdoor storage; and complementary uses compatible with industrial operations (Policy 5.5.5.1). Concrete batching plants and adult videotape stores, while otherwise permitted in the General Industrial designation elsewhere in the Town subject to certain conditions, are expressly excluded from the General Industrial designation as it applies to the Mayfield West Land Use Plan (Section 7.12.12.3; Policies 5.5.5.2, 5.5.5.3). New or expanding industrial uses are to be buffered from existing or committed sensitive land uses, with the intensification or redevelopment of an industrial site within an existing settlement area to meet the minimum separation distance for a Class I, Class II, or Class III industrial use under MOE Guideline D-6, implemented through the Town's Zoning By-law (Policy 5.5.5.4).

The proposed cross-dock facility, comprising warehousing and transportation terminal functions with associated truck and trailer parking, is a permitted use of the General Industrial designation. There are no sensitive uses in proximity to the proposed use.

In our opinion, the proposed development is consistent with the designation, permitted uses, and development policies applicable to the Mayfield West Land Use Plan under the former Town of Caledon Official Plan.

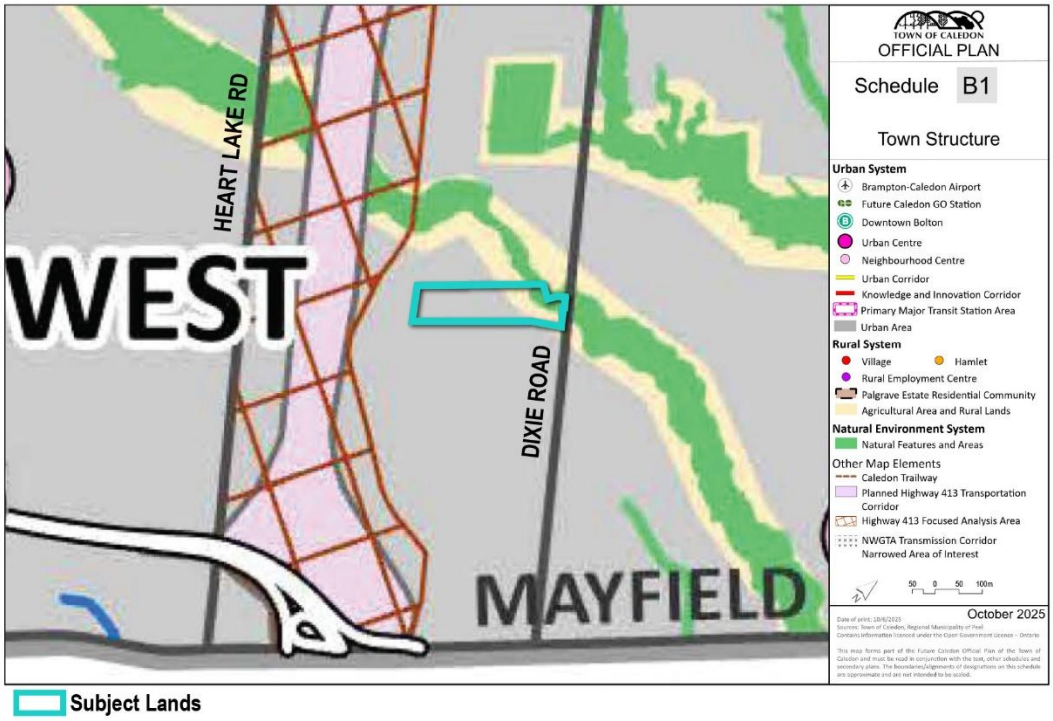
4.5.2 Future Caledon Official Plan

In 2019, the Town of Caledon initiated its review of the Caledon Official Plan as required by the *Planning Act* and to ensure conformity with provincial policy and the adopted RPOP 2051. In March 2024, the Town's new Official Plan, the Future Caledon Official Plan ("FCOP"), was adopted by Council and on October 22, 2025, the Minister of Municipal Affairs and Housing issued a decision to approve the FCOP with modifications. The FCOP replaces the majority of the 1978 Town of Caledon Official Plan as noted in Policy 1.2.1 of the FCOP.

The following section will provide an overview of the FCOP policies to ensure that the proposed amendment is consistent with the latest policy direction provided by the Town.

The Subject Lands are designated as "Urban Area", "Agricultural Area and Rural Lands", and "Natural Features and Areas" under Schedule B1 – Town Structure of the FCOP, as shown in Figure 16. Schedule B4 further designates the Subject Lands as "New Employment Area," "Prime Agricultural Area," and "Natural Features and Areas," as shown in Figure 5, further below.

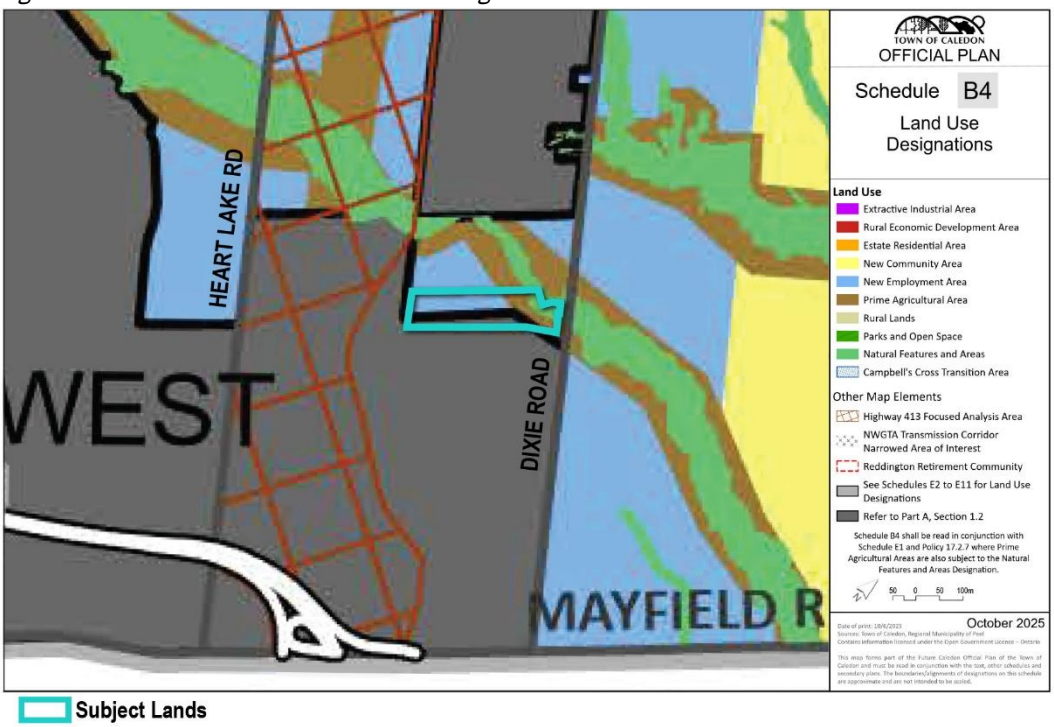
Figure 5: FCOP Schedule B1 – Town Structure



Source: Town of Caledon (2025) MGP (2026)

The FCOP defines Urban Areas as part of the Urban System, which is intended to include communities of Bolton, Mayfield West, Caledon East, and undeveloped new urban land that was approved through the Region of Peel Official Plan in 2022 (Section 3.1.3a). They are intended to accommodate most of the Town's forecasted population and employment growth that will occur over the next thirty years and beyond. The Town's population and employment is expected to significantly increase in accordance with minimum forecasts of 300,000 persons, 90,000 households, and 125,000 jobs by 2051, consistent with the forecasts of the ROP (Policy 4.1.1).

Figure 6: FCOP Schedule B4 – Land Use Designations



Source: Town of Caledon (2025) MGP (2026)

Urban Area

The FCOP requires all New Community Areas and New Employment Areas to undergo secondary planning to implement the Town Structure by applying land use designations and policies and to establish detailed policies that build on the direction from Part C, General Policies, and elsewhere in this Plan, to guide future development (Policy 21.1.1). The land use designations are intended to enable and support a range of appropriate urban land uses and protect, restore, and enhance natural features and areas and water resource system features and areas, and provide parks, open spaces, and stormwater management (Policy 21.1.1).

New and developing community and employment areas within the Town's Urban Area remain subject to general land use designations until secondary planning is completed (Policy 21.1.3). This Plan establishes a meaningful range of permitted uses for each land use designation to allow flexibility and avoid unnecessary official plan amendments (Policy 21.1.4). Development and redevelopment in the Urban Area should be staged and coordinated in alignment with the Region of Peel's Water and Wastewater Master Plan (Policy 21.1.9).

New Employment Area

The New Employment Area designation identifies lands intended for future employment use. Development is not permitted on New Employment Area lands until a secondary plan is adopted and in effect, at which time the designation will be replaced with one or more detailed land use designations (Policy 23.6, 23.6.1). Notwithstanding this policy, it is our opinion that a secondary plan is not required for the Subject Lands to proceed with the proposed redesignation

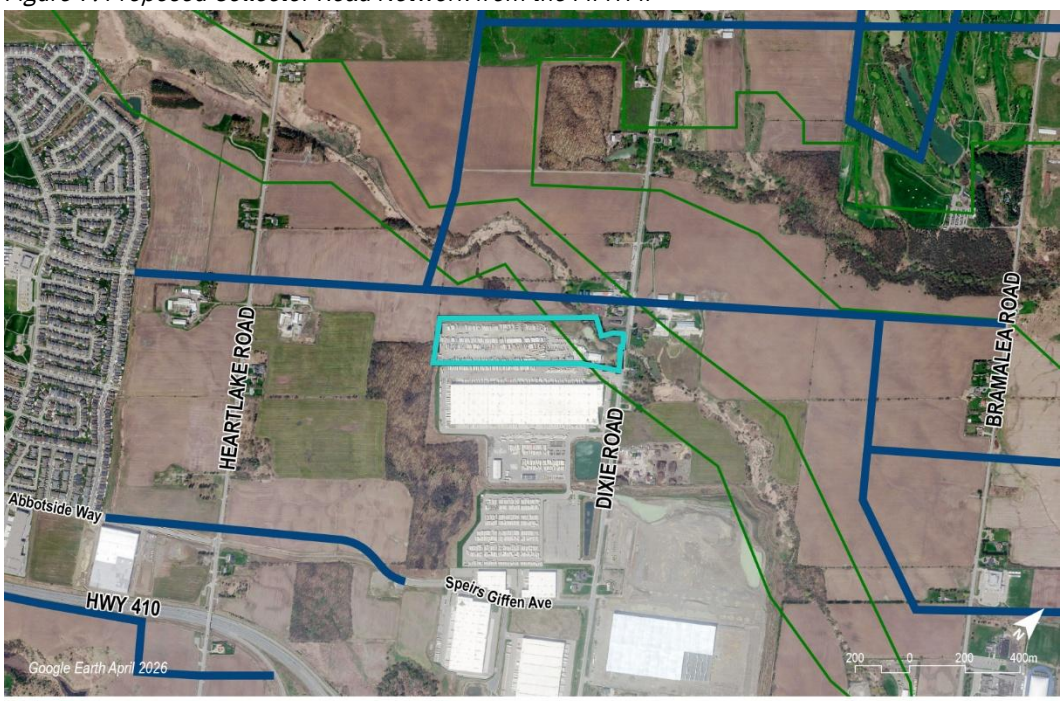
The intent of the secondary planning requirement is to ensure the comprehensive planning of New Employment Area lands, including the application of detailed land use designations and policies, the protection, restoration, and enhancement of natural features and areas and water resource system features, the provision of parks, open spaces, and stormwater management, and the coordination of community-defining elements such as the conceptual collector road network (Policy 21.1.1, 21.1.2).

This comprehensive planning exercise is not necessary for the Subject Lands, for the following reasons:

- Existing Land use designation: As discussed in Section 4.5.1, the southern portion of the Subject Lands is already designated with an in-force General Industrial designation under the Mayfield West Land Use Plan (a component of the former Caledon Official Plan). The proposed redesignation of the balance of the Subject Lands to General Employment Area extends this existing, established employment designation and land use pattern, rather than introducing a new use to an area. The Subject Lands are immediately adjacent to the existing UPS facility, an established logistics and warehousing operation, and are further situated among other established distribution and warehousing operations, including Grainger Canada and Trillium Supply, around the Dixie Road and Mayfield Road intersection. The proposed development is consistent in use, scale, and character with this existing context. The land use pattern for this portion of the New Employment Area is therefore already established through the existing designation on the same parcel and the surrounding employment context. On this basis, the proposed redesignation does not represent the introduction of a new land use into an area.
- Collector road network**:** The Town's Multi-Modal Transportation Master Plan (MMTMP) Addendum, building on the Council-approved 2024 MMTMP, establishes the preferred east-west multi-modal collector road alignment for this area. As shown on the collector road network mapping (see figure below), the proposed alignment crosses Dixie Road north of the Subject Lands and does not traverse or abut the Subject Lands. The proposed development accordingly does not impact the Town's planned collector road network.

- Natural features: The natural heritage features on the Subject Lands are protected and retained in their natural state, as discussed in Section 4.1.3, consistent with the protection and enhancement contemplated by the secondary planning process.
- Parks, open space, and stormwater management: Parkland dedication and stormwater management for the Subject Lands are addressed through the proposed development, as discussed in Sections 4.1.5 and elsewhere in this report, without reliance on secondary plan-level planning.

Figure 7: Proposed Collector Road Network from the MMTMP



Delaying a development of this nature, where it does not undermine the Town's ability to comprehensively plan the surrounding New Employment Area, would not be appropriate and would not serve the Town's economic objectives.

Goods Movement District

The Town recognizes the importance of the goods movement sector for e-commerce and other logistics requirements, and has established the Goods Movement District overlay to provide a coordinated approach to planning for this sector in strategic locations (Policy 23.9). The overlay is intended to be applied through the preparation of the required secondary plans, informed by a Goods Movement and Logistics Land Use Strategy to be prepared by the Town (Policy 23.9).

The Official Plan Amendment proposes to apply the Goods Movement District overlay to the Subject Lands in advance of the completion of this Strategy. For similar reasons to those outlined above regarding the secondary plan, it is our opinion that the overlay can be appropriately applied to the Subject Lands at this time:

- Location and extent: The Strategy is intended to determine the location and extent of the Goods Movement District designation (Policy 23.9.1(a)). The Subject Lands' are immediately adjacent to the existing UPS facility, together with other established distribution and warehousing operations in proximity, including Grainger Canada and Trillium Supply around the Dixie Road and Mayfield Road intersection, which already establishes this location as part of an existing goods movement and logistics cluster consistent with the type of strategic location the overlay is intended to identify.

- Long-term, stable location: The overlay is intended to provide long-term, stable locations for large-scale warehousing, goods movement, and logistics uses (Policy 23.9.1(b)). The Subject Lands, situated in proximity to Highway 410 and the future planned GTA West Corridor, and adjacent to an established use of this nature, are well-suited to this function on a permanent basis.

- Compatibility and buffering: The overlay's objectives include restricting accessory and ancillary uses to those directly supporting the primary use and providing appropriate buffers from sensitive uses (Policy 23.9.1(d), (e)). The proposed development includes no sensitive land uses and will incorporate landscaping and screening consistent with Policy 23.9.3(c).

Delaying the application of the Goods Movement District overlay to the Subject Lands, where the location is already established as part of an existing goods movement cluster, would similarly not be appropriate and would not serve the Town's economic objectives.

General Employment

As noted previously, the proposed OPA seeks to redesignate the Subject Lands to General Employment Area.

The General Employment Area designation is intended to provide long-term, stable locations for manufacturing, processing, and warehousing uses with good access to arterial roads and connections to the 400-series highway network (Section 23.8.1). The General Employment Area permits manufacturing, processing, and warehousing with accessory outdoor storage, business offices as an accessory use, and open storage uses, contractors yards, and truck parking yards as discretionary uses (Sections 23.8.2 and 23.8.3).

The proposed cross-dock facility is a warehouse building in which goods are received, sorted, and reloaded for outbound distribution, together with associated truck and trailer parking and the proposed accessory office use is located within the existing dwelling, consistent with this permission.

Section 23.8.4 sets out the following development policies for the General Employment Area:

a) *"Maximum heights for open storage should be included in the implementing zoning.*
b) *Salvage and recycling operations, concrete batching plants and asphalt plants, open storage uses, contractor's facilities are not to be located on a corner lot where one road is an arterial road, Regional Road or Provincial Highway.*
c) *Truck and trailer parking associated with a permitted use will not be permitted in the front yard or exterior side yard.*
d) *Outdoor storage associated with a permitted use will only be permitted in the interior and rear yards only."*

The proposed development satisfies the permitted uses and development policies of the General Employment Area designation. No salvage, recycling, concrete batching, or asphalt use is proposed, and as the Subject Lands are not located on a corner lot, this restriction does not apply. As discussed in Section 4.6, no truck or trailer parking is proposed in a front yard, the Subject Lands do not contain an exterior side yard, and outdoor storage is proposed to be located in the interior and rear yards only. Maximum heights for open storage will be established through the implementing Zoning By-law Amendment.

Prime Agricultural Area

Prime Agricultural Areas are intended to be areas where agriculture is the primary use, and they are protected for long-term agricultural use (Section 17). In areas where Prime Agricultural Areas are designated as Natural Features and Areas as well, the policies of Natural Features and Areas apply in addition to the permissions and restrictions of the Prime Agricultural Area designation (Section 17.2.7).

The Prime Agricultural Area designation permits agricultural and related uses, additional residential units, on-farm diversified uses, and a principal dwelling associated with an agricultural operation (Section 17.9.1). The Prime Agricultural Area designation discourages non-agricultural uses and may only be permitted in accordance with the policies of the FCOP, applicable Provincial Plans, and Provincial legislation. Impacts from non-agricultural uses are to be avoided, and where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment (Section 17.9.2.c).

As discussed in Section 4.4.2, the eastern corner of the Subject Lands, designated Prime Agricultural Area, achieved a LEAR score of 492 under the 2016 LEAR study and an updated score of 522, both below the 535 threshold established by the Town for identifying Prime Agricultural Area, and the Subject Lands are not designated for specialty crops. This portion of the Subject Lands is not actively farmed and is functionally isolated from surrounding agricultural operations, given the fully urbanized context of the surrounding lands. An Agricultural Impact Assessment prepared in support of the

application confirms no negative impact on surrounding agricultural operations or the Agricultural System, consistent with Policy 17.9.2(c).

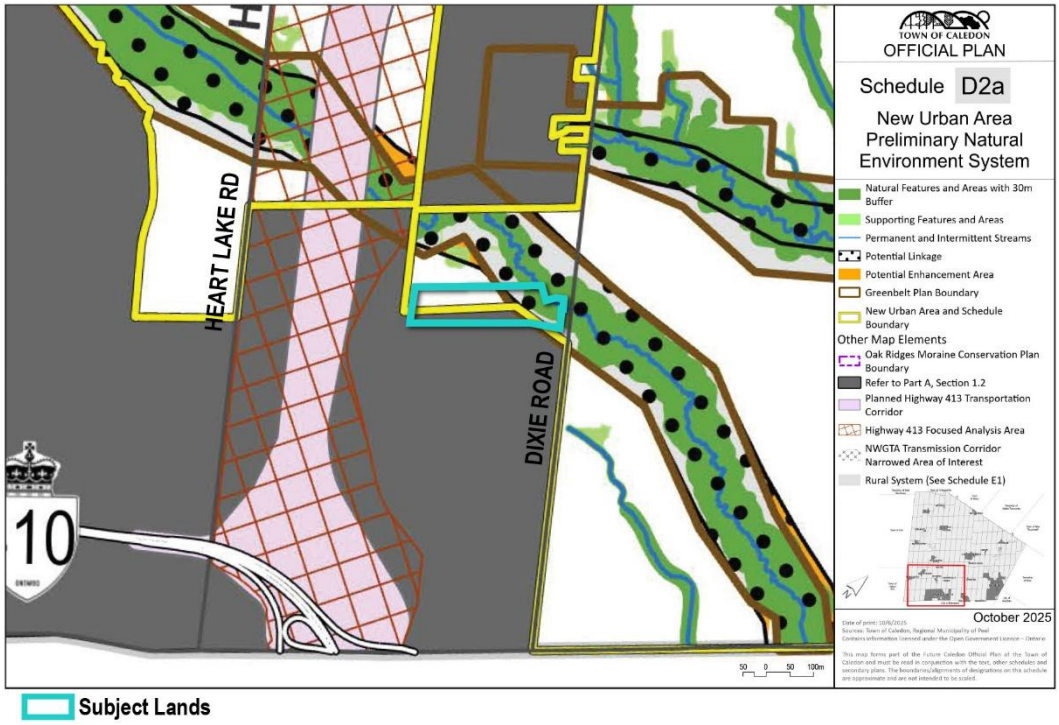
This portion of the Subject Lands is also designated Natural Features and Areas. As such, the policies of that designation apply in addition to the Prime Agricultural Area policies. The proposed development retains and protects this portion of the Subject Lands in its natural state, as discussed in Sections 4.1.3 and 4.4.3.

In our opinion, given the findings of the LEAR study and the Agricultural Impact Assessment, the isolated and non-agricultural function of this portion of the Subject Lands, and the retention and protection of the natural heritage features, the proposed development is consistent with the intent of the Prime Agricultural Area policies of the FCOP.

Environmental Policy Area Designation Policies

Portions of the Subject Lands are designated "Natural Features and Areas" and "Potential Linkage" within the Greenbelt Boundary on Schedule D2a of the FCOP, as shown in Figure 18 below.

Figure 8: FCOP Schedule D2a – Natural Environment System



Source: Town of Caledon (2025) MGP (2026)

The Natural Features and Areas designation corresponds to the Core Areas of the Greenlands System identified in the ROP (Policy 13.3.1). Development and site alteration within this designation is not permitted, except for the following (Policy 13.3.3):

a) forest, fish, and wildlife management;
b) conservation and flood or erosion control projects, but only if demonstrated to be necessary in the public interest and after all reasonable alternatives have been considered;
c) essential infrastructure exempted, pre-approved, or authorized under an environmental assessment process;
d) passive recreation;
e) minor development and minor site alteration;
f) existing uses, buildings, or structures;
g) expansions or alterations to existing buildings or structures;
h) accessory uses, buildings, or structures; and,
i) a new single residential dwelling on an existing lot of record, provided that the dwelling would have been permitted by the applicable planning legislation or zoning by-law on May 23, 2014.

The existing dwelling, shed, and barn located within the Natural Features and Areas designation are long-established structures, proposed to continue in use for accessory office, cross-dock, and storage purposes, respectively, without expansion. These uses are consistent with the exceptions for existing uses, buildings, or structures, and accessory uses, buildings, or structures, permitted under Policy 13.3.3(f) and (h). No new development is proposed within the Natural Features and Areas designation other than the proposed stormwater management pond, discussed further below.

In our opinion, the proposed development conforms to the policies of the Environmental Policy Area designation.

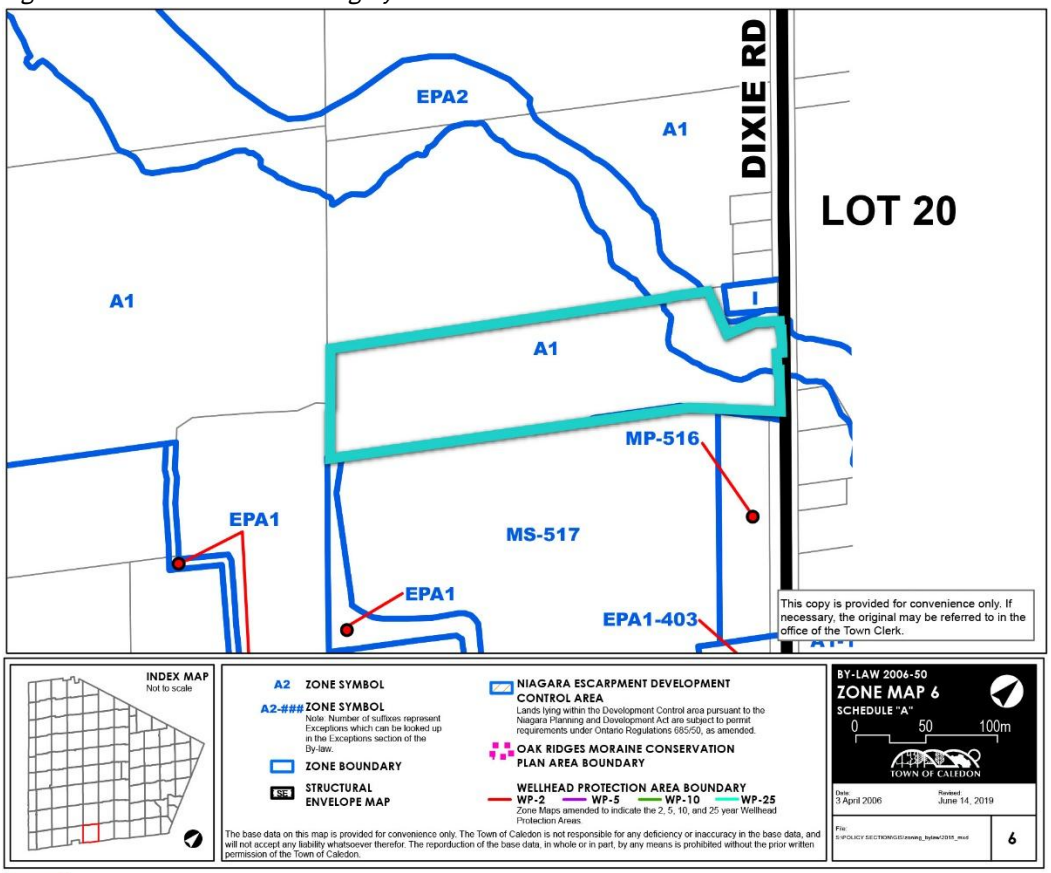
4.5.3 Requirement for an Official Plan Amendment

An Official Plan Amendment to the Town of Caledon Official Plan is required to redesignate the Subject Lands to General Employment with a Goods Movement District overlay designation. An overview and analysis of the requested amendment can be found in Section 5.0 of this report.

4.6 Town of Caledon Zoning By-law 2006-50

The Subject Lands are zoned Agricultural (A1), with an Environmental Policy Area 2 (EPA2) zone applying to the northeastern portion of the property generally corresponding to the Natural Features and Areas designation, as shown in the figure below.

Figure 9: Town of Caledon Zoning By-law 2006-50



Source: Caledon Zoning Bylaw (2026),

The Agricultural zone permits a range of uses, primarily related to agriculture and farming. Other permitted uses include bed and breakfast establishments, outdoor cannabis-related uses, accessory dwellings, detached dwellings, environmental management, forest management, accessory gasoline pump islands, home occupations, outdoor industrial hemp-related uses, horticultural nurseries, accessory open storage, and produce storage buildings.

The Environmental Policy Area 2 zone permits additional residential units, detached dwellings, bed and breakfast establishments, environmental management, existing farms, forest management, home occupations, and non-intensive recreation. It should be noted that the lands zoned EPA2 are located within the Greenbelt, at the northeast portion of the property near the existing valleyland and waterbody.

It should be noted that the Town of Caledon initiated a Town-wide Zoning By-law Amendment to rezone the lands designated as New Urban Area 2051 to a “Future Development (FD) Zone”. The purpose of this zone category is to continue to permit the uses under the existing Agricultural (A1) Zone in addition to temporary sales offices and accessory uses to legal permitted uses. At the time of writing this Report, the draft ZBA

has been presented at a Public Meeting on April 7, 2026 and is currently under review by the Town. We note that should this ZBA be approved, the portion of the Subject Lands zoned as A1 will be rezoned as FD, which permits the uses existing on the lands.

The proposed Zoning By-law Amendment would rezone the developable portion of the Subject Lands from Agricultural (A1) to a site-specific Serviced Industrial (MS) exception zone, and retain the Environmental Policy Area 2 (EPA2) zone over the natural heritage feature.

Four site-specific exceptions are requested to facilitate the proposed development: an accessory truck wash use, an increased building height, a reduced driveway setback recognizing the existing shared access with the UPS facility, and a stormwater management facility permission within the EPA2 zone. The requested exceptions allow the Subject Lands to function as an efficient, modern cross-dock facility while fully respecting and protecting the natural heritage features on the site. The detailed rationale for each exception is provided in Section 6.2.

In our opinion, the proposed Zoning By-law Amendment, including the requested site-specific exceptions, will facilitate a development that is compatible with the surrounding area and consistent with the intent of the Town's Zoning By-law.

4.6.1 Requirement for a Zoning By-law Amendment

An amendment to the Township’s Zoning By-law 2006-50, as amended, is required to rezone the Subject Lands to the Serviced Industrial (MS-X) Exception Zone and Environmental Policy Area 2 (EPA2-X) Exception Zone and establish site-specific provisions. An overview and analysis of the requested amendment can be found in Section 6.0 of this report.

5.0
Proposed Official Plan Amendment

5.1 Proposed Official Plan Amendment

The purpose of this application is to amend the Future Caledon Official Plan to redesignate a portion of the Subject Lands from New Employment Area to General Employment Area on Schedule "B4," Land Use Designations, and Schedule "F1," Urban System, and to apply the Goods Movement District overlay designation to the same lands on both schedules, to permit the development of the proposed cross-dock and logistics/warehousing facility. The Amendment also proposes to add a new site-specific policy to permit the redesignation and the application of the Goods Movement District overlay to proceed in advance of the adoption of a secondary plan for the surrounding area and the completion of the Town's Goods Movement and Logistics Land Use Strategy, respectively.

The Future Caledon Official Plan currently designates the Subject Lands "New Employment Area," "Prime Agricultural Area," and "Natural Features and Areas." The proposed Official Plan Amendment ("Draft OPA") does not propose to alter the Prime Agricultural Area or Natural Features and Areas designations, which are to be retained and protected in their current form.

A draft of the OPA is submitted as part of the application package.

5.2 Rationale for the Official Plan Amendment

It is our opinion that the proposed Amendment is warranted and represents good planning. The proposed development is consistent with the PPS 2024 and conforms with the Region of Peel Official Plan and the Future Caledon Official Plan, as proposed to be amended, for the following reasons:

- Contributing available employment land to meet the Town's and Region's forecasted employment need and ensure an adequate supply of employment land is available, consistent with the density achievable for a warehousing and logistics use following the Province's redefinition of employment areas.
- Extending an already-established employment land use pattern, given the in-force General Industrial designation on the southern portion of the same parcel under the Mayfield West Land Use Plan and the Subject Lands' adjacency to the existing UPS facility and other established distribution and warehousing

operations in the vicinity.

- Providing a job-producing development that is ready to proceed, supporting the Town's economic objectives in the context of ongoing global economic uncertainty.
- Protecting and retaining the natural heritage features on the Subject Lands in their natural state.
- Locating a strategic goods movement and logistics use in proximity to Highway 410 and the future planned GTA West Corridor, consistent with the Town's planned goods movement network.

6.0
Proposed Zoning By-law Amendment

6.1 Proposed Zoning By-law Amendment

The proposed Zoning By-law Amendment ("Draft ZBA") seeks to rezone the developable portion of the Subject Lands from Agricultural (A1) to a site-specific Serviced Industrial (MS-X) Exception Zone, and to amend the Environmental Policy Area 2 (EPA2) zone over the natural heritage feature to a site-specific Environmental Policy Area 2 (EPA2-X) Exception Zone, to facilitate the proposed development. The Draft ZBA is submitted as part of this application.

6.2 Rationale for Zoning By-law Amendment

The requested ZBA will allow for the development of the proposed industrial use. As demonstrated throughout this report, the proposed development is compatible with the surrounding community, consistent with the Region and Town’s visions for the Subject Lands and accommodates the employment land need in the Town and the Region.

The requested ZBA will implement the proposed Official Plan Amendment and facilitate the development of the proposed cross-dock facility. As demonstrated throughout this report, the proposed development is compatible with the surrounding area, consistent with the Region's and Town's planning vision for the Subject Lands, and accommodates the Town's and Region's employment land needs.

Three site-specific exceptions are requested as part of the proposed Zoning By-law Amendment.

An accessory use permission is required to permit the proposed truck wash facility, which is not currently permitted in any Industrial Zone. The truck wash is proposed at the rear of the site as an accessory use, intended solely to clean trucks and trailers associated with the proposed cross-dock facility, and is not a stand-alone commercial car wash serving the general public. The MS zone already permits comparable automotive service uses, including Motor Vehicle Repair Facility, Motor Vehicle Body Shop, and Maintenance

Garage, Accessory, reflecting that automotive servicing is an expected and compatible component of industrial operations involving vehicle and trailer fleets. The proposed truck wash is consistent in nature and scale with these existing permitted uses and meets the intent of the MS zone's permitted use list.

The proposed cross-dock building requires a height of 15 m, exceeding the 12.2 m maximum in the MS zone. Modern cross-dock facilities require greater clear height than conventional industrial buildings to accommodate loading equipment and racking. The Subject Lands are not adjacent to any residential or other sensitive use and are adjacent to the UPS facility, which is a similar industrial use of similar scale. The proposed building is also set back well beyond the minimum required yards, providing adequate separation to mitigate any height impact.

The proposed development requires a 0 m driveway setback from the lot line shared with the adjacent UPS facility. The MS zone standard requires a minimum 1.5 m driveway setback from any other lot line. It should be noted that the By-law permits a nil setback for a mutual driveway in the MP (Prestige) zone however no equivalent provision currently exists for the MS zone. The intent of the driveway setback standard is to maintain appropriate separation between driveways on adjacent lots for safety and functional purposes. This concern does not arise on the Subject Lands, where the driveway is an existing, mutually shared access serving both the Subject Lands and the UPS facility. The requested exception recognizes this existing shared-access condition and meets the intent of the driveway setback standard.

The proposed development requires a permission for a stormwater management facility within the Environmental Policy Area 2 (EPA2) zone, which is not currently a permitted use in this zone. The intent of excluding stormwater management ponds from the EPA2 zone is to prevent infrastructure from being sited within, or in a manner that adversely affects, key natural heritage features and their associated functions. The proposed stormwater management pond is sited outside all key natural heritage features, key hydrologic features, and their associated minimum vegetation protection zones, as confirmed by the Environmental Impact Study/Natural Heritage Evaluation prepared by Beacon Environmental. The requested exception accordingly permits this specific, evaluated infrastructure without compromising the protection of the natural heritage features.

In our opinion, the proposed Zoning By-law Amendment, including the requested site-specific exceptions, will facilitate a development that is compatible with the surrounding area and consistent with the general intent and purpose of the Town's Zoning By-law.

7.0
Planning Opinion

7.1 Statement of Conformity with Policy Documents

As discussed in this report, the Provincial Planning Statement (2024), the Region of Peel Official Plan (2024 Consolidation), the Town of Caledon Official Plan (October 2025), the former (1978) Town of Caledon Official Plan (Mayfield West Land Use Plan), and the Town of Caledon Zoning By-law 2006-50 have been reviewed to assess the appropriateness of the proposed development. It is my opinion that the proposed development is consistent with or conforms to the policies of these documents, as proposed to be amended, and implements good planning that is in the public interest.

7.2 Conclusion

The proposed development represents good planning and is in the public interest. It provides an appropriate industrial use on lands designated for employment purposes, extending an already-established employment and goods movement pattern on the Subject Lands and in the surrounding area, while fully protecting and retaining the site's natural heritage features. The proposed development is well-located to serve the Town's and Region's growing logistics and warehousing sector, in proximity to Highway 410, the future planned GTA West Corridor, and an established cluster of distribution and warehousing uses, and will contribute meaningfully to the Town's and Region's employment land supply and long-term economic diversification.

The Subject Lands are ready to proceed with a proposed development, as supported by technical studies, that does not compromise the Town's ability to comprehensively plan the surrounding New Employment Area. In the current environment of global economic uncertainty, including tariffs and related disruptions to trade and supply chains, the timely approval of job-producing employment development of this nature is important to the local and regional economy. Bringing this development forward without delay supports the Town's and Region's economic objectives and provides meaningful, near-term employment opportunities for the community.

The proposed development is consistent with, and conforms to, the applicable Provincial, Regional, and municipal planning policies discussed throughout this report, and represents good planning that is in the public interest.



Malone Given Parsons Ltd.
201- 140 Renfrew Drive
Markham Ontario
L3R 6B3 Canada

1-905-513-0170 mgp.ca