

November 22, 2024

GSAI File: 870-001, 792-020, 792-021

Town of Caledon
Planning Department
6311 Old Church Road
Caledon, ON L7C 1J6

Attention: Ms. T. Bal
Senior Planner

**RE: Caledon Station Secondary Plan Area
Draft Plan of Subdivisions and Zoning By-law Amendments
Planning Justification Addendum Density Letter
With Prejudice (OLT Case Nos. OLT-23-001127 and OLT-23-001128)
Town Files: POPA 2021-0002, 21T-22001C, RZ 2022-0002, 21T-22002C, RZ 2022-0003
Mixed-Use, Transit-Oriented Development in Caledon Station Secondary Plan Area
Argo Macville I Corporation, Argo Macville II Corporation, Argo Macville III Corporation, Argo
Macville V Corporation, Argo Humberking Corporation, Argo Humber Station Corporation
14275 The Gore Road, 0, 14295, 14396 Humber Station Road & 0 King Street**

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Caledon Community Partners and to Argo Macville I Corporation, Argo Macville II Corporation, Argo Macville III Corporation, Argo Macville V Corporation, Argo Humberking Corporation and Argo Humber Station Corporation (collectively, the 'Owner') of the lands within the Caledon Station Secondary Plan Area (CSSPA) and municipally known as 14275 The Gore Road, 0, 14295, 14396 Humber Station Road and 0 King Street, in the Town of Caledon. For the purpose of this Letter, the entire Caledon Station Secondary Plan Area (CSSPA) lands are considered the 'Subject Lands'. On behalf of the Owner, further to our last submission in October 2024 and further to the commentary we have received to date, including during the collaborative discussion with Town Staff held on November 20, 2024, we are pleased to provide this 'with prejudice' Planning Justification Addendum Density Letter to support the application to facilitate a compact, mixed-use, transit-oriented development on the Subject Lands.

In response to commentary received regarding the achievement of minimum density targets on those lands specifically located within the Caledon GO Major Transit Station Area ('MTSA') within the CSSPA, we offer the following commentary.

POLICY CONTEXT

We highlight that in accordance with the in-effect policy and regulatory framework at the time of writing, it is understood and acknowledged that minimum density targets are to be achieved. More specifically, the in-effect Provincial, Regional and local policy framework establishes a minimum density target for lands within strategic growth areas and MTSA's, which the Subject Lands are, as well as for lands that are outside of strategic growth areas.

As further described in the Planning Justification Reports dated June 2023, July 2024 and the Planning Justification Report Addendums, dated October 2024, the Subject Lands are subject to various minimum density targets given its location within the Caledon GO MTSA, within the Town's Designated Greenfield Area and its location within various land use designations of the Caledon Station Secondary Plan. Of relevance for this Letter, is to demonstrate that the minimum density target established for all lands across the Caledon GO Major Transit Station Area is achieving the minimum density of 150 people and jobs combined per hectare. The proposed development for the lands within the MTSA portion of the Caledon Station Secondary Plan Area meets the requisite minimum 150 people and jobs combined density requirement.

As context and background, we highlight that the proposal for the MTSA portion of the CSSPA has been planned and designed to ensure the minimum density requirements are achieved. There is no disagreement that the Subject Lands represent a unique opportunity to realize a compact, healthy, mixed-use community, organized around the Caledon GO Station. Given this, should additional height of built forms be desirable given the favourable policy permissions, this will only further support and exceed achievement of the minimum density requirements.

Importantly, Town Staff have requested additional clarification on how many on-site jobs are possible in contributing to achieving the minimum density target within the MTSA of 150 people & jobs/ha. The estimation of only on-site jobs (and specifically excluding possible work-from-home jobs) per gross hectare appropriately includes the anticipated employees that could be reasonably accommodated by the proposed wide range of non-residential uses permitted within the Medium Density and Mixed Use/High Density designated lands within the MTSA portion of the Secondary Plan Area including retail, office, service-commercial and other population-related employment uses across the community, the number of employees for school facilities to operate safely and efficiently, the number of expected employees within a future Caledon Station Library Branch, and the number of employees for the Fire Station. The on-site job estimates related to these uses is logical, practical, and permitted and expected by policy directives contained within the CSSP.

It is notable that while a large portion of the Caledon GO MTSA is located within the CSSPA, there are additional lands located within the MTSA but beyond the limits of the CSSPA which are designated 'Employment Area' and which will also generate a fair number of on-site jobs in the future.

To illustrate this, **Figure 1** on the next page depicts Schedule C-8 (Caledon Station Secondary Plan Land Use Plan) which was endorsed by Caledon Council in March 2024. This Figure shows the limits of the Major Transit Station Area Boundary in purple, in the context of the limits of the Caledon Station Secondary Plan Area. Importantly, the MTSA in its entirety consists of a total of approximately 100.5 ha, of which 80.65 ha are contained within the Caledon Station Secondary Plan Area, and the balance (19.85 ha) are located beyond the Secondary Plan limits. Further, it is important to note that the portion of the lands within the MTSA limits but beyond the CSSPA (specifically, east of Humber Station Road, south of King Street and southeast of the intersection of Humber Station Road and King Street) are designated "Employment Area" (per Schedule E-4 Employment Areas in the Region of Peel Official Plan) and "Dry Industrial Area" (per Schedule C Bolton Land Use Plan in Caledon's In force March 2024 Consolidation Official Plan). **Figure 2** on page 4 depicts the Peel "Employment Area" designation for those lands located within and beyond the Caledon Station MTSA.

FIGURE 1

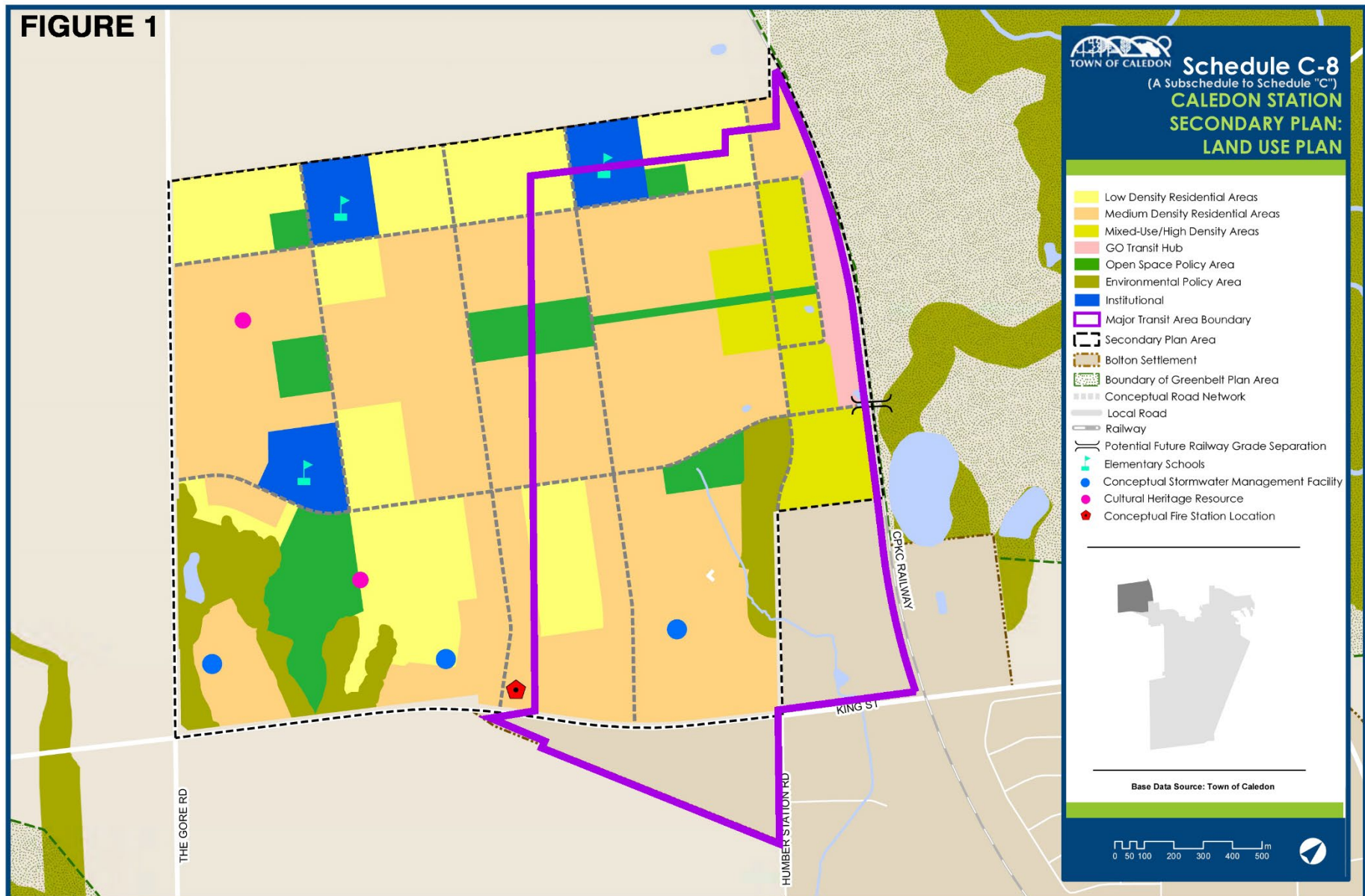
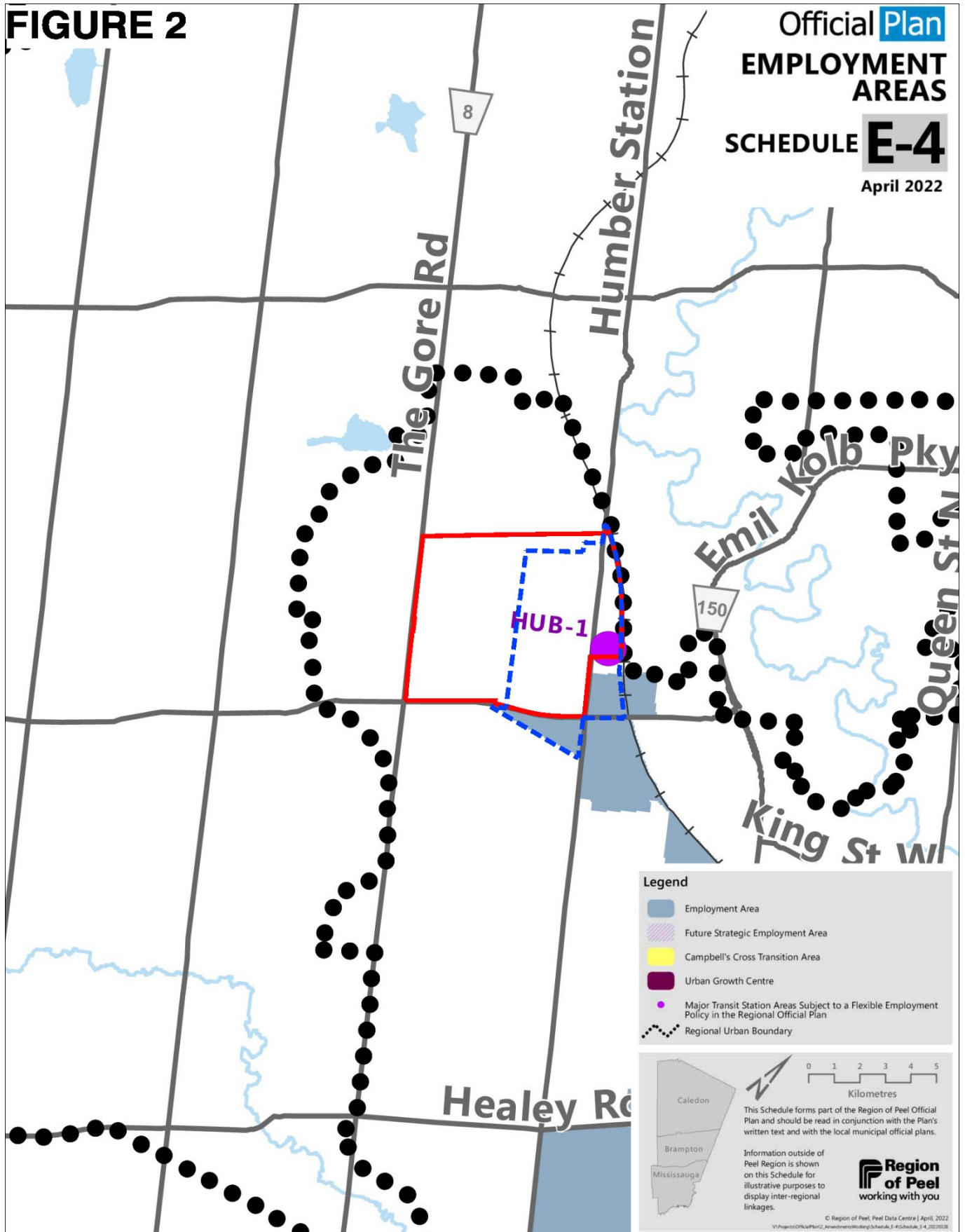


FIGURE 2



As Staff are aware, the Caledon Station Secondary Plan contains policy directives and land use permissions for different land uses within the Secondary Plan Area. In addition to jobs provided through the school blocks, the Fire Station, and the future library, the areas within the “Mixed Use / High Density” and “Medium Density Residential” land use designations within the MTSA will accommodate a wide range and mixture of uses which will contribute to the ‘on site’ jobs within the Secondary Plan Area.

Specifically, Secondary Plan policies for the “Mixed Use / High Density” and “Medium Density Residential” land use designations permit a wide range, mix and variety of uses, including a full range of office, retail, commercial, service commercial, institutional, cultural and entertainment uses as well as a full range of built forms. In addition, there is policy in the Secondary Plan noting that development of the lands designated “Medium Density Residential” and “Mixed Use / High Density” along Humber Station Road and the future spine road (within the MTSA) are encouraged to include ground level non-residential uses that complement and support more intensive development of the residential uses. These ground-related, non-residential uses can and should include small-scale commercial, service-commercial, restaurants and professional offices. As well, Section 7.16.7.1.7 of the Secondary Plan directs that development within the “Mixed Use / High Density Area” will be encouraged to complement the adjacent innovation district and not hinder the opportunity for future expansion of the innovation district to lands along the east side Humber Station Road immediately south of the plan area, to King Street. There is also policy direction permitting local commercial and service commercial uses within the Medium Density designation throughout the Plan Area, including within the MTSA.

As well, it is worthwhile to note that on lands designated “GO Transit Hub” (all within the MTSA), transit-related and transit-supportive uses and facilities are permitted, including but not limited to station buildings and related office uses, bus terminals, passenger amenity areas and public open spaces, and accessory retail and service commercial uses. In terms of zoning permissions for lands in the Secondary Plan Area, including within the MTSA, Town of Caledon Council enacted Zoning By-Law No. 2024-055 for the subject lands in July 2024 which is now in full force and effect. This zoning permits a wide range and mix of uses throughout the Plan Area, including within the MTSA.

As well, for each land use designation, including the “Mixed Use / High Density” and “Medium Density” lands in the Secondary Plan Area, there are minimum densities and heights required, which also ensure the overall minimum density within the MTSA is met. Every site-specific development application being advanced within Caledon Station must conform to the Secondary Plan to ensure that minimum densities (among other policy directives) will be met.

OPPORTUNITY FOR ‘ON-SITE’ JOBS WITHIN THE MTSA

In January 2021, urbanMetrics completed a Fiscal Impact Study in support of the Secondary Plan submission, which was submitted in February 2021. They then updated their Study in response to revisions and iterations of the Secondary Plan and the revised Fiscal Impact Study was dated June 2023. As the Town is aware, this Study quantified the net financial impact that the proposed development would have on the Town of Caledon and Region of Peel. This was accomplished through calculating both one-time and ongoing financial benefits accruing to the Town and Region, as well as the financial costs that will be incurred by the Town and Region to provide services to the future residents and employees on site. The report also provided a conservative estimate of jobs to be established throughout the Secondary Plan Area..

The Study reviewed the Secondary Plan Land Use Schedule and the Caledon Station Framework Plan at the time and confirmed (per 2023 version) that the proposed concept comprised 8,671 residential units and some 19,300 square metres of commercial floor space. It was estimated in this 2023 updated Study that the project would conservatively accommodate approximately 21,435 residents, 498 on-site jobs, and 2,052 work from home jobs at full build-out (based on a work from home calculation of 9.1% of the anticipated population, per 2022 Statistics Canada data, at the time of writing the report). The urbanMetrics' Study estimated on site jobs based on the expectation that the Secondary Plan Area was expected to accommodate approximately 19,300 square metres of non-residential GFA based on a conservative estimated GFA that could be accommodated within the "Mixed Use / High Density" blocks. It was concluded in the study that this Secondary Plan Area was representing a new area of concentrated growth and economic activity for the Town of Caledon.

As the Land Use Plan, associated policy directives and Framework Plan evolved over the course of the planning process, the overall unit mix and count was revised and the population estimate across the Secondary Plan Area was revised to be approximately 18,400 people and just over 500 on-site jobs (which represents the current estimate). This was further refined for the MTSA only, and estimated a population of 10,680 population and 383 on-site jobs within the MTSA only. Notably, the on-site job estimate presented here is very conservative does not account for any additional on-site jobs related to the future fire station or library within the Secondary Plan area, or any mixed use or ground floor non-residential uses permitted on "Medium Density" and "GO Transit Hub" designated lands pursuant to the Caledon Station Secondary Plan or current in-effect zoning for the Secondary Plan.

In light of the fact this estimate is characterized as being conservative, and in response to discussions with Town staff recently to better understand the on-site job opportunities and possibilities within the MTSA within CSSPA, urbanMetrics has recently revisited the estimated non-residential GFA within the MTSA that is logical, practical and appropriate for the "Mixed Use / High Density" blocks and the "Medium Density" blocks within the MTSA. urbanMetrics have provided an updated estimate for on-site jobs which demonstrates what opportunity there is and what is realistically possible within the MTSA, based on the current Land Use Plan, current policy directives, current zoning and current Framework Plan and assumptions.

Table 1 on the next page below summarizes the opportunities and possibilities for on-site jobs within the CSSPA MTSA:

Table 1: urbanMetrics' November 2024 Updated Summary of 'On Site' Job Opportunities Within MTSA in Caledon Station Secondary Plan

	Land Area (Acres)	Gross to Net Adjustment	Developable Building Area	Gross Floor Area (sq.ft.)	Sq. Ft per Employee	Estimated Employment
Mixed Use Blocks:						
Ground Floor Commercial ¹	21.47	75%	30%	210,219	400	525
Mixed Use Blocks:						
Second Floor Office ²	21.47	75%	30%	210,219	250	841
Medium Density Blocks:						
Commercial	33.71	75%	10%	55,057.5	400	138
Medium Density Blocks:						
Office	33.71	75%	10%	55,057.5	250	220
1 Schools (@ 40 employees)						40
Library (from DCBS) ³				35,000	750	47
Fire Station (3 bay)	2.0					20
Total Jobs Excluding Work From Home						1,831
Work From Home (based on 9.57% of population)						1,023
Opportunity / Total Estimated Jobs in MTSA						2,854

It should be noted that the new library has been included as a use to be located within the MTSA. This is a community land use that will undoubtedly attract people into the Hub of Caledon Station and will ensure that amenities such as this are easily accessed in the MTSA Hub without the use of a car. It is further assumed that the library may be located within the ground floor of a mixed use building.

As indicated above, it is estimated that approximately 1,831 on-site jobs are reasonably possible within the MTSA of CSSPA pursuant to current policy and zoning permissions and pursuant to the current CSSPA Land Use Plan and Framework Plan. We note that the above estimates do not account for any additional mixed use or ground floor non-residential uses permitted on "GO Transit Hub" designated lands pursuant to the Caledon Station Secondary Plan or current in-effect zoning for the Secondary Plan. Should those lands be considered, the number of on-site jobs would increase.

Overall, we highlight that the with the recent urbanMetrics' estimate of 1,831 on-site jobs (excluding work from home jobs) plus the estimated 10,680 population being estimated within the MTSA in CSSPA, the density estimate for the

¹ Acreage based on October 2, 2024 Framework Plan. The FIA used the DC density for all population related employment of 51 sq.m. per employee. A ratio of 400 sq.ft. per employee better reflects retail development specifically.

² Assumed offices over retail space.

³ 2024 DCBS identifies a 35,000 sq. ft. library branch in Caledon Station. Assuming location within MTSA.

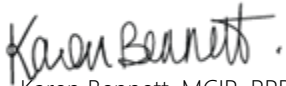
MTSA in CSSPA is **155 people and jobs combined per hectare**, which exceeds the required minimum density of 150 people and jobs per hectare being achieved. Further, importantly, the minimum density achieved only increases when work from home jobs are included and should greater heights be pursued, consistent with policy permissions.

As Staff are aware, we share the desire to ensure there is a sufficiently high number of 'on-site' jobs within the MTSA to support the ability for the MTSA to generate and attract people and jobs. In light of the fact this estimate has been characterized as being possible, practical, logical and in conformity with current policy and zoning for lands in the CSSPA, we trust this revised estimate for on-site jobs demonstrates what opportunity there is and what is realistically possible within the MTSA, based on the current Land Use Plan, current policy directives, current zoning and current Framework Plan and assumptions.

We trust the above is helpful. Please do not hesitate to contact the undersigned if there are questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



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