

Town of Caledon
Planning and Development Services
6311 Old Church Road
Caledon, ON L7C 1J6

February 13, 2026
File 6716-2

Attn: Sagar Babbar, Community Planner – Development

**RE: Planning Justification Addendum Letter
Official Plan and Zoning By-law Amendment Submission
Related File: DART 2024-0013 and DART 2024-003
14 Station Road, Town of Caledon**

1.0 INTRODUCTION

Weston Consulting is the authorized planning agent for King Station GP Inc. and King Station Facility Inc., the owner of the lands municipally known as 14 Station Road in the Town of Caledon (the “**Subject Lands**”). The Subject Lands are located on the southeast corner of King Street West and Station Road and form part of a larger block comprised of the Sorrento Retirement Residence and Amalfi Ridge townhouse development.

Pre Consultation (DART) Official Plan Amendment and Zoning By-law Amendment applications were submitted to the Town in March 2024 to permit the development of a surface parking lot comprised of 96 parking spaces to support the Sorrento Retirement Residence (the “**Proposed Development**”). Comments from the Town and Region were received between June and August 2024, however formal comments from the Toronto Region Conservation Authority (TRCA) were withheld due to concerns regarding the potential valley feature and erosion hazard on the Subject Lands. In December 2024, a partial submission was filed with the Town to address the initial TRCA comments and since that time, the Owner has been working closely with the TRCA to address their concerns. The enclosed material has been revised to address specific matters raised by the TRCA and a formal submission under the *Planning Act* is being provided.

This Planning Justification Addendum Letter (the “**Letter**”) has been prepared as an addendum to our Planning Justification Report dated February 2024 (the “**Original PJR**”) and provides a rationale for the revised Proposed Development based on the applicable policy framework. It continues to be our opinion that the revised Proposed Development represents good planning and is consistent with the Provincial Planning Statement, 2024 (the “**PPS**”) and continues to conform to the Region of Peel Official Plan (the “**ROP**”), Town of Caledon Official Plan, 1978, Future Caledon Official Plan, 2025 (the “**COP 2025**”) and the Bolton Secondary Plan, 2025 (the “**BSP**”). The findings and analysis contained in the Original PJR remain relevant and applicable and should be read in conjunction with this Letter.

2.0 DESCRIPTION OF THE REVISED PROPOSED DEVELOPMENT

The revised Proposed Development reduces the overall number of surface parking spaces and improves the ecological features (the “**Revised Proposed Development**”). The Revised Proposed Development is comprised of 96 parking spaces, inclusive of two barrier-free spaces and the design of the parking lot has been reconfigured to improve east-west ecological connectivity. Vehicular access to the parking lot from Station Road has been shifted north and the last row of parking spaces has shifted to the east. The new parking layout enables the creation of an east-west corridor across the southern edge of the Subject Lands to create a continuous connection between two larger ecological systems to the east and west. According to the scoped Environmental

Impact Study (EIS) prepared by GEI Consultants, this connection will enable urban-adapted wildlife to move across the Subject Lands in the post-development scenario.

A landscape area with seating is located along the northern edge of the parking lot to provide additional outdoor amenity space for the Retirement Residence. Pedestrian access to the Retirement Residence from the parking lot is gained by a staircase located on the west side of this landscape area with proposed access directly to the Retirement Residence located on the east side of the landscape area.

The Revised Proposed Development will be an accessory to the Retirement Residences and provide additional parking for its visitors, employees and residents. The enclosed supporting material has been carefully revised in order to respond to key matters raised by the TRCA following the DART submission, specifically as it relates to the history of Jaffary's Creek. Accordingly, the proposed Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) seek to extend the existing land use designation and Zone category of the Retirement Home to include the parking lot.

3.0 POLICY ANALYSIS

3.1 Provincial Planning Statement, 2024

The PPS came into effect on October 20, 2024, replacing the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020 Consolidation). The PPS provides policy direction on matters of provincial interest related to land use planning and development throughout the Province of Ontario.

The policies of the PPS direct growth within built-up areas, encourage intensification and the creation of complete communities, and support the efficient use and management of land, resources and infrastructure to meet current and future needs. The PPS supports appropriate development to promote the efficient use of land where infrastructure and public services are available while protecting resources of provincial interest, such as public health and safety and the quality of the natural and built environment. All land use planning decisions in Ontario shall be consistent with the PPS.

Building Homes, Sustaining Strong and Competitive Communities

Section 2 of the PPS "Building Homes, Sustaining Strong and Competitive Communities" outlines policies which are supportive of efficient land use and development patterns. The policies encourage the establishment of complete communities and recognize that the long-term prosperity of the Province depends on land use planning which wisely manages growth and development and provides for a mix of land uses in areas with existing or planned transit infrastructure.

2.1 – Planning for People and Homes

Section 2.1 of the PPS provides direction on future growth and development and the achievement of complete communities. Policy 2.1.6 states that,

2.1.6 Planning authorities should support the achievement of complete communities by:

a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and

c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.

The Revised Proposed Development will provide additional parking spaces for visitors, employees and residents of the Retirement Residence and will be an accessory to an existing use in an area of the Town that represents a complete community. The surface parking lot has been designed to support access for Retirement Residence through strategic design interventions such as the landscaped amenity area.

2.2 – Housing

Section 2.2 of the PPS establishes housing policies and promotes and encourages a range and mix of housing types and densities that meet current and projected future housing needs. According to Policy 2.2.1,

2.2.1 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities;

Although the Revised Proposed Development does contemplate housing units, it represents an accessory use to the existing 140-unit Retirement Residence. It is consistent with the PPS in that it supports and existing specialized residential use.

2.3 – Settlement Areas and Settlement Area Boundary Expansions

2.3.1 General Policies for Settlement Areas

Section 2.3.1 of the PPS provides direction on future growth and development within settlement areas and recognizes settlement areas as critical to the long-term development and prosperity of Ontario's communities. The PPS aims to promote an efficient growth pattern within settlement areas, including the protection of existing resources.

The PPS also provided policies to ensure the effective use of infrastructure and public service facilities within settlement areas. The following policies, which provide direction on the management of growth within settlement areas, are particularly relevant to the Revised Proposed Development:

2.3.1.1 Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.

2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:

a) efficiently use land and resources;

b) optimize existing and planned infrastructure and public service facilities;

2.3.1.3 Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.

The Subject Lands are located within a settlement, which represents an appropriate location for development, and have been improved with a Retirement Home and townhouse development thereby supporting a complete community. The Revised Proposed Development efficiently utilizes a portion of the Subject Lands to provide an accessory use for the Retirement Residence, which provides 140 units of specialized residential accommodation for seniors and employs up to 21 staff members during the peak day period.

2.8 – Employment

2.8.1 Supporting a Modern Economy

Section 2.8.1 of the PPS provides policy direction to support a modern economy through economic development and competitiveness. The following policies are relevant to the Revised Proposed Development:

- 2.8.1.1 *Planning authorities shall promote economic development and competitiveness by:*
- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
 - b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
 - c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
 - d) encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
 - e) addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

Although the Revised Proposed Development will not provide direct employment opportunities, it will support the existing Retirement Residence by providing additional parking spaces for employees. As such, the proposed development will support the economic viability of the Retirement Residence, which fulfills PPS policies.

Infrastructure and Facilities

Section 3 of the PPS “Infrastructure and Facilities” outlines policies to maximize existing infrastructure and public service facilities, wherever possible. The following policies are relevant to the Revised Proposed Development:

3.2 – Transportation Systems

- 3.2.1 Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero- and low- emission vehicles.*
- 3.2.2 Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.*
- 3.2.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be planned for, maintained and, where possible, improved, including connections which cross jurisdictional boundaries.*

The Revised Proposed Development will be an accessory to the existing Retirement Residence to provide additional parking spaces for residents, employees and visitors. Although the PPS encourages efficient

transportation planning and connectivity, the Retirement Residents is a specialized use that requires additional surface parking to support its operations. Further, the Traffic Operations Assessment prepared by NexTrans concludes that based on the maximum site generated traffic volumes, there is expected to be minimal impact to the intersection of King Street West and Station Road, and that vehicle queuing and delays are expected to be minimal. Please refer to the Traffic Operations Assessment for details.

3.6 – Sewage, Water and Stormwater

3.6.8 Planning for stormwater management shall:

- a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c) minimize erosion and changes in water balance including through the use of green infrastructure;*
- d) mitigate risks to human health, safety, property and the environment;*
- e) maximize the extent and function of vegetative and pervious surfaces;*
- f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*

GEI has prepared a Functional Servicing and Stormwater Management Report that notes that the site will provide adequate stormwater capacity through the proposed stormwater facilities for the development. The post-development flow rates have been attenuated to be less than or equal to the allowable release rates. To minimize the transport of sediment off-site during construction, a slit fence will be installed along the property boundary in all locations where run-off is anticipated to discharge from the site to adjacent lands. Please refer to the Functional Servicing and Stormwater Management Report for details.

Wise Use and Management of Resources

Section 4 of the PPS “Wise Use of Management and Resources” outlines policy direction for the management of resources including water, agriculture, minerals, cultural heritage and natural features.

The below policy sections are relevant to the Revised Proposed Development:

4.1 – Natural Heritage

Section 4.1 of the PPS provides policy direction for the protection of natural heritage features. The following policies are relevant to the Revised Proposed Development:

- 4.1.1 Natural features and areas shall be protected for the long term.*
- 4.1.2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*
- 4.1.5 Development and site alteration shall not be permitted in:*

c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)¹;

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

GEI has prepared a revised EIS to evaluate the existing and historical natural heritage features and associated functions, on and adjacent to the Subject Lands. The results indicate that the Subject do not provide any wildlife habitat as they have already been disturbed.

Furthermore, in response to key matters raised by the TRCA, the EIS finds that the Subject Lands contain characteristics of a historical significant valleylands associated with Jaffary's Creek, a tributary to the Humber River, which has long since been buried. One small remnant surface water feature, associated with the historic Jaffary's Creek, Jaffary's Creek Pond is located to the east of the Subject Lands and receives surface water primarily from an upstream stormwater management facility (west of Coleraine Drive). There is no natural flow present within the historic Jaffray's Creek. According to the 2026 WSP memo, the Subject Lands no longer contain valleyland features or hazard lands due to the extensive urban development encompassing the Subject Lands and surrounding area. According to both reports, the proposed development of the Subject Lands will no pose significant risk to public health and safety.

Protecting Public Health and Safety

Section 5 of the PPS "Protecting Public Health and Safety" outlines policies for the protection of public health and safety from natural and human made hazards.

The following policy sections are relevant to the Revised Proposed Development:

5.2 – Natural Hazards

5.2.8 Further to policy 5.2.7, and except as prohibited in policies 5.2.3 and 5.2.6, development and site alteration may be permitted in those portions of hazardous lands and hazardous sites where the effects and risk to public safety are minor, could be mitigated in accordance with provincial standards, and where all of the following are demonstrated and achieved:

- a) development and site alteration is carried out in accordance with floodproofing standards, protection works standards, and access standards;*
- b) vehicles and people have a way of safely entering and exiting the area during times of flooding, erosion and other emergencies;*
- c) new hazards are not created and existing hazards are not aggravated; and*
- d) no adverse environmental impacts will result.*

Through the Scoped EIS and the supporting Geotechnical Assessment Memo prepared by WSP, it has been demonstrated that the proposed development will pose little risk to public health and safety, which can be mitigated through engineering and geotechnical standards. The historic valleylands and hazard lands are no longer present on the Subject Lands. The proposed development also intends to provide separation and mitigation from the sensitive land uses present across Station Road which will be protected from the construction activities by the Erosion and Sediment Control (ESC) Plan which has been developed by GEI.

Please refer to the Scoped EIS and Geotechnical Report for further details on how potential impacts on the natural heritage and natural hazard features and their associated functions will be avoided or minimized through the application of the protection, mitigation and enhancement measures.

Summary

The proposed surface parking lot will provide additional parking for residents, employees and visitors of the Retirement Residence to the north. Although it does not provide direct housing and employment opportunities, the parking lot will support an existing use, which provides important economic development, housing, and employment opportunities in a manner that is consistent with policies 2.2.1 and 2.8.1.1 of the PPS. The Subject Lands are located within a Settlement Area, and the parking lot has been designed to efficiently use land with minimum impact on the surrounding area and natural heritage functions on the site pursuant to policies 4.1.5 and 5.2.8. It should also be noted that the surrounding area has many characteristics that represent a complete community, including the Retirement Residence, the existing townhouses, and the existing low-rise neighbourhood. The surface parking lot, which will be an accessory to the existing use, supports the overall function of the area.

The historic characteristics associated with Jaffary's Creek are no longer present on the Subject Lands due to the extensive development in the area. GEI and WSP have demonstrated that the Revised Proposed Development is appropriate and it is our understanding that these findings directly address key matters raised by the TRCA.

In our opinion, the Revised Proposed Development is consistent with the PPS

3.2 Region of Peel Official Plan, 2022

The Original PJR provides an analysis of the ROP and concludes the Proposed Development conforms to its policies. This section of the Letter provides additional analysis related to Natural Environment policies in the ROP to evaluate the Revised Proposed Development. It continues to be our opinion that the Revised Proposed Development conforms to ROP.

Natural Environment

Section 2 of the ROP "Natural Environment" provides policy direction on the preservation and restoration of the natural environment and system within the Region. The following policies are relevant to the Revised Proposed Development:

2.14 – Greenlands System

2.14.5 *Define the Greenlands System as being made up of the following components:*

b) Natural Areas and Corridors, which will be interpreted, protected, restored, and enhanced and shown, as appropriate, in the local municipal official plans

c) Potential Natural Areas and Corridors, which will be interpreted, protected, restored, and enhanced and shown, as appropriate, in the local municipal official plans. Potential Natural Areas and Corridors will be analyzed to determine their functional role in supporting and enhancing the ecological integrity of the Greenlands System;

2.14.12 *Define the Core Areas of the Greenlands System as:*

g) valley and stream corridors meeting one or more of the criteria for Core Area valley and stream corridors in Table 2 and as shown on Schedule C-2. The limit of Core Area valley and stream corridors shall be determined jointly with the local municipalities in consultation with relevant agencies and in accordance with the definition in the Glossary of this Plan and the criteria in Table 2 to recognize the unique urban and rural character of the Region. Core valley and stream corridors include the main branches, major tributaries and other tributaries associated with the Credit River, the Etobicoke Creek, the Mimico Creek, the West Humber

River and the Humber River and with the other identified watercourses draining directly to Lake Ontario, except for those portions within Delineated Built-up Areas in the urban settlements of Bolton, Mayfield West, and Caledon East and the Rural Settlement Areas in the Rural System as designated in a local municipal official plan. These valley and stream corridors are continuous linkages connecting to other Greenlands System Core Areas.

2.16 – Natural and Human-made Hazards

2.16.5 Direct the local municipalities, in consultation with the conservation authorities, to include policies consistent with the policies of this Plan, and mapping in their official plans in order to:

a) identify flood plains, hazardous lands, hazardous sites, known human-made hazards and lands that are regulated under the Conservation Authorities Act in accordance with relevant technical standards and guidelines;

The EIS indicates that the Subject Lands do not contain any features that meet the definition of a Core Area within the ROP. While the Subject Lands do contain a valley and stream corridor that meets the Core Area criteria, they are located within the urban settlement of Bolton and therefore exempt, according to Policy 2.14.12 of the ROP. No other Core Areas are present within the Subject Lands.

Through the EIS and the supporting Geotechnical Assessment Memo, it has been demonstrated that the proposed development is minor in nature and will pose little risk to public health and safety, from a natural hazard perspective, which can be mitigated through engineering and geotechnical standards.

Please refer to the Scoped EIS and Geotechnical Report for further details on how potential impacts on the natural heritage and natural hazard features and their associated functions will be avoided or minimized through the application of the protection, mitigation and enhancement measures.

3.3 Future Caledon Official Plan, 2025

On March 26, 2024, Town of Caledon Council adopted the FCOP and on October 22, 2025, the Minister of Municipal Affairs and Housing issued a decision to approve the FCOP with modifications. The FCOP sets out a strategic and comprehensive approach to guiding growth and development throughout the Town of Caledon to the 2051 planning horizon.

The Subject Lands are located within the *Urban Area* according to Schedule B1 (Town Structure) of the FCOP. According to Schedule B4 (Land Use Designations), the 1978 Official Plan (2024 Consolidation) is still applicable, which designates the Subject Lands *Environmental Policy Area*.

Key policies have been analyzed below to provide a review of the Revised Proposed Development as it relates to the land use designations and natural heritage features and associated functions, on and adjacent to the Subject Lands.

Future Caledon Official Plan

Section 1 of the FCOP 2025 “The Future Caledon Official Plan” provides direction on transition between the 1978 Official Plan. The following policies are relevant to the Revised Proposed Development:

1.2 Plan Area and Geographic Context

1.2.1 The 1978 Official Plan, as amended and in force as of the day before adoption of the Future Caledon Official Plan, remains in effect as it applies to:

a) lands identified as Rural Service Centre on Schedule A1 to the 1978 Official Plan, as amended, including:



i) the Bolton settlement area, including the Downtown Bolton special policy area, and associated secondary plan areas (Bolton Core, Bolton South Hill, West Bolton, North East Bolton, South Simpson Industrial, Coleraine West and Caledon Station) as depicted on Schedules C, C-1, C-1A, C-2, C-3, C-4, C-5, C-6, C-7 and C-8 to the 1978 Official Plan, as amended;

The 1978 Town of Caledon Official Plan (March 2024 Consolidation) remains in effect as it applies to the Subject Lands, as it is within the Bolton Secondary Plan area. It continues to be our opinion that the Revised Proposed Development conforms to the 1978 Caledon Official Plan (March 2024 Consolidation) as evaluated in the Original PJR.

Natural Environment System

Section 13 of the FCOP “Natural Environment System” provides policy direction on the protection of the Town’s natural heritage system. The following policies are relevant to the Revised Proposed Development:

13.1 Objectives

The planning objectives for the Natural Environment System are as follows:

a) maintain, restore, or where possible, enhance the diversity and connectivity of natural features and areas in the Town, and the long-term ecological function and biodiversity of the Natural Environment System recognizing linkages between and among natural features and areas and supporting features and areas;

i) ensure that development mitigates identified impacts on the Natural Environment System and is appropriately setback and buffered from components of the Natural Environment System;

13.2 Components of the Natural Environment System

13.2.1 The Town's Natural Environment System is made up of the following components:

a) Core Areas of the Greenlands System as identified and protected in the Region of Peel Official Plan, and which are designated Natural Features and Areas by this Plan;

b) Natural Areas and Corridors and Potential Natural Areas and Corridors of the Greenlands System as identified and protected in the Region of Peel Official Plan, and which are designated Supporting Features and Areas by this Plan;

13.2.2 The Natural Features and Areas designation and Supporting Features and Areas overlay designation apply throughout the Town of Caledon and may be more restrictive than provincial plans and the Provincial Planning Statement unless doing so would conflict with provincial policy. In the event of a conflict, the provincial plans and Provincial Planning Statement shall prevail.

13.3 Natural Features and Areas

13.3.1 The Natural Features and Areas designation in this Plan corresponds to the Core Areas of the Greenlands System as identified and protected in the Region of Peel Official Plan. The Natural Features and Areas designation is shown on Schedule D1, Natural Environment System, and Schedules D2a and D2b, New Urban Area Preliminary Natural Environment System. Individual components are shown on Schedule D3, Natural and Supporting Features and Areas. The Natural Features and Areas designation includes the following:

c) significant valleylands

13.3.3 Development and site alteration within the Natural Features and Areas designation is not permitted except for:

- e) minor development and minor site alteration;*
- h) accessory, uses, buildings, or structures;*

13.3.4 Where a development or site alteration approval for any of the uses permitted in accordance with Policy 13.3.3 is proposed within the Natural Features and Areas designation, the development and site alteration will only be permitted if it has been demonstrated to the satisfaction of the Town, that there will be no negative impacts on the natural feature or their ecological function, and that:

- a) there is no reasonable alternative location outside of the Natural Feature and Areas designation and the use, development or site alteration is directed away from the Natural Feature and Areas designation to the greatest extent possible;*
- b) if avoidance is not possible, the impact to the feature is minimized;*
- c) any impact to the feature or its function is mitigated through restoration or enhancement to the greatest extent possible; and,*
- d) where ecosystem compensation is determined to be appropriate and feasible, including for essential infrastructure, it may be considered in accordance with Town ecosystem compensation guidelines and applicable Conservation Authority requirements.*

13.3.5 Policies 13.3.3 and 13.3.4 do not apply to certain key natural heritage features and key hydrologic features subject to a Provincial plan where development and site alteration is not permitted, or to Provincially Significant Wetlands.

13.4 Supporting Features and Areas

13.4.1 The Supporting Features and Areas overlay designation in this Plan corresponds to the Natural Areas and Corridors and Potential Natural Areas and Corridors of the Greenlands System as identified and protected in the Region of Peel Official Plan. The Supporting Features and Areas overlay designation is shown on Schedule D1, Natural Environment System, and Schedules D2a and D2b, New Urban Area Preliminary Natural Environment System. Individual components are shown on Schedule D3, Natural and Supporting Features and Areas. The Supporting Features and Areas overlay designation includes the following:

- n) Any other valley and stream corridor that have not been defined as meeting one or more of the criteria for Core Area valley and stream corridors in Table 2 of the Region of Peel Official Plan;*

13.4.2 Permitted uses in the Supporting Features and Areas overlay designation are those permitted in the underlying land use designation and in accordance with applicable Provincial Plans and regulatory requirements under the Conservation Authorities Act. Notwithstanding the above, no development or site alteration will be permitted within the Supporting Features and Areas overlay designation unless it has been demonstrated to the satisfaction of the Town, that there will be no negative impacts on the feature or their ecological functions and/or hydrologic functions, and that:

- a) there is no reasonable alternative location outside of the Supporting Feature and Areas designation and the use, development or site alteration is directed away from the Natural Feature and Areas designation to the greatest extent possible;*

- b) *if avoidance is not possible, the impact to the feature is minimized;*
- c) *any impact to the feature or its function is mitigated through restoration or enhancement to the greatest extent possible; and,*
- d) *where ecosystem compensation is determined to be appropriate and feasible, including for essential infrastructure, it may be considered in accordance with Town ecosystem compensation guidelines.*

13.4.16 *In a case where all or part of a linkage area is retained in accordance with Policy 13.4.14, the lands within the linkage area will be planted and left as natural selfsustaining vegetation (except for those lands used for infrastructure and passive recreational uses, if permitted) or remain in agricultural use. The linkage may also be designed to permit compatible uses as evaluated in Policy 13.4.15 so long as the ecological function of the linkage is maintained.*

The FCOP 2025 does not provide any definitions or criteria for evaluating valleylands or valley and stream corridors. According to GEI, based on feedback from the TRCA, using both provincial and regional definitions and criteria, the historic characteristics of the Subject Lands meet the definition of a significant valleyland based on the PPS, and also a valley and stream corridor (core natural area) within the ROP. This is based on the historic Jaffary's Creek which has since been buried. Based on this, the EIS demonstrates that the Subject Lands can be considered a significant valleyland in the FCOP, however the existing conditions of the Subject Lands do not meet this definition.

The EIS concludes that the Revised Proposed Development is minor in nature and is considered accessory to the Retirement Residence. Accordingly, it is GEI's opinion that there is no reasonable alternative location outside of the Natural Feature and Area designation for the Revised Proposed Development, and anticipated impacts have been considered and mitigated appropriately. Therefore, the requirement for the proposed development to demonstrate that there will be no negative impacts on the natural feature has been met.

GEI has also recommended that a linkage/wildlife corridor be incorporated into the proposed design. The wildlife corridor is proposed to be 5.66 metres to 11.65 metres in width and traverses the Subject Lands east to west. This wildlife corridor is intended to permit the movement of urban tolerant species.

Natural and Human-made Hazards

Section 16 of the FCOP "Natural and Human-made Hazards" outlines policies for the protection of the public from natural and human made hazards. The following policies are relevant to the Revised Proposed Development:

16.2 General Policies

16.2.1 *The Region and Conservation Authorities identify areas at risk from natural hazards where development is to be restricted and/or prohibited, based on spatial analysis and climate projections. For lands subject to natural and human-made hazards, the Town will, as appropriate:*

- d) *prohibit development and site alteration in areas that would become inaccessible to people and vehicles during times of flooding hazards or erosion hazards, unless it has been demonstrated that the site has safe access and egress appropriate for the development and the natural hazard.*

16.3 Ravine, Valley and Stream Corridor and Erosion Hazards

16.3.4 *The Town will prohibit development and site alteration within the erosion hazard limit. Development and site alteration proposed adjacent to an erosion hazard will require the following*

conditions can be met to the satisfaction of the Town and relevant approval authorities in order to be permitted:

- a) confirmation of being located outside the long-term stable slope line;
- b) studies to determine the long-term stable slope line should be in accordance with Provincial and Conservation Authority technical guidelines and guidance;
- c) new hazards will not be created, and existing hazards will not be aggravated;
- d) there will be no negative impacts on the Natural Environmental System;
- e) safe access will be maintained for people and vehicles entering and exiting the area during times of erosion emergencies, flooding hazards and erosion hazards; and,
- f) the development and site alteration will be carried out in accordance with established standards and procedures.

Through the EIS and the supporting Geotechnical Assessment Memo prepared by WSP, it has been demonstrated that the Revised Proposed Development is minor in nature and will pose little risk to public health and safety, from a natural hazard perspective, which can be mitigated through engineering and geotechnical standards.

Please refer to the Scoped EIS and Geotechnical Report for further details on how potential impacts on the natural heritage and natural hazard features and their associated functions will be avoided or minimized through the application of the protection, mitigation and enhancement measures.

Community Areas

Section 22 of the FCOP provides policy direction for the land use designations within the Town as established by the appropriate adopted Secondary Plan. In this case, the Bolton Secondary Plan, 2025 establishes the land use designation for the Subject Lands as *Neighbourhood Area*. The following policies are relevant to the proposed development:

22.7 – Neighbourhood Area Designation

22.7.1 Objectives

The planning objectives for the Neighbourhood Area designation are as follows:

- b) provide for a range of housing types, tenure and affordability to promote accessible, affordable, adequate, and appropriate housing for all socio-economic groups;*
- d) guide the development of neighbourhoods based on their context, location, age, maturity and the need to offer transportation options, aging in place opportunities, and greater affordability*

22.7.2 Permitted Uses

- a) residential uses;*
- b) long term care homes and retirement homes;*
- c) public service facilities that are integral to a neighbourhood including but not limited to places of worship, day cares, libraries, schools, community centres and public recreation facilities; and,*
- d) neighbourhood-scale retail, commercial, personal service and professional service uses that are integrated within mixed-use buildings or on mixed-uses sites.*

22.7.3 Development Policies

d) The local road system will be designed to enhance the pedestrian environment by increasing the visual interest of streets and pedestrian comfort through the provision of sidewalks, walkways, frequent intersections, attractive streetscapes and landscaping.

f) Neighbourhood Areas will be designed with a high priority placed on the pedestrian, cycling and transit experience within neighbourhoods, utilizing site layout, building location and building design to reinforce convenience, comfort and safety.

The surface parking lot represents an efficient development pattern as it will provide additional parking facilities for the Retirement Residence in a compact form with limited impact in surrounding uses. It should also be noted that the surrounding area has many characteristics that represent a complete community, including the Retirement Residence, the existing townhouses, and the existing low-rise neighbourhood. The surface parking lot, which will be an accessory to the existing use, supports the overall function of the area. Pedestrian connectivity, lighting, and landscaping features have been incorporated into the design of the parking lot to ensure safe connections to the surrounding area.

3.4 Bolton Secondary Plan, 2025

On November 25, 2025, Town of Caledon Council adopted the Bolton Secondary Plan (the “BSP”). It was subsequently appealed to the Ontario Land Tribunal (OLT) and is not yet in full force and effect. It remains relevant but not determinative to the Revised Proposed Development.

The Subject Lands are designated *Neighbourhood Area* according to Schedule H33a (Bolton Community Structure and Land Use) of the BSP. According to Schedule H33c (Bolton Natural Environment System), the Subject Lands are located within a *Natural Feature and Area* and according to Schedule H33d (Bolton Natural and Supporting Features and Areas), the Subject Lands are located within a *Valley and Stream Corridor*.

33.1 Introduction

Section 33.1 of the BSP “Introduction” outlines general planning objectives for Bolton, growth targets and the hierarchy for growth and intensification. The following policies are relevant to the Revised Proposed Development:

33.1.4 Objectives

The planning objectives for Bolton are as follows:

a) Ensure intensification occurs in an appropriate manner achieving a compact and efficient urban form to optimize the use of existing infrastructure and services.

c) Ensure a strong sense of place is achieved through a mix of uses, parks and urban squares, streetscapes, interface between mixed use development and rights of way with a cohesive look and feel.

e) Encourage a high-quality built form and consistent level of urban design for the public and private realms through walkable streets, parks and open spaces, pedestrian-scale buildings, landscape and urban design elements and other public amenities where appropriate.

g) Protect and integrate a connected natural heritage system including natural hazards into the design of the community to create local destinations and opportunities for compatible passive and active uses.

33.1.5 Relationship to the Parent Official Plan

- a) *The policies of the Bolton Secondary Plan must be read in their entirety, together with the relevant policies and mapping of the Future Caledon Official Plan, as contained in Parts A to G.*
- b) *The Bolton Secondary Plan provides additional direction for development and decision-making specific to the Secondary Plan Area. In the case of a conflict between a policy in Part A to G and the Bolton Secondary Plan, the secondary plan will prevail.*

33.1.6 Community Structure

Schedule H33a illustrates Bolton's community structure, which consists of the following:

- c) *Neighbourhood Areas, as detailed in Section 33.3.*

33.1.7 Managing Growth and Change

- a) *The planned density for the Bolton Secondary Plan Area (excluding the Highway 50 Queen Street Corridor) will meet or exceed 50 residents and jobs per gross hectare.*
- b) *The Bolton Secondary Plan Area (including the Highway 50 Queen Street Corridor) is estimated to accommodate approximately 32,000 units and 74,000 people by 2051.*

33.3 Neighbourhood Area

Section 33.3 of the BSP provides policy direction related to development within the Neighbourhood Area designation. The following policy is relevant to the proposed development:

33.3.1 All lands designated Neighbourhood Area are subject to Section 22.7, Neighbourhood Area Designation, of the Future Caledon Official Plan.

The BSP is forecasted to accommodate a population of 74,000 people by 2051. To accommodate the projected growth, the Town places an emphasis on intensification within the Urban System and Built-up Areas to maximize the efficiency of existing infrastructure, human services and transportation infrastructure. The population forecast for 2051 will include a growth in the population of older adults, which will require infrastructure and public service facilities to meet their needs. Although the Revised Proposed Development does not provide direct population growth opportunities, it will be used as an accessory to the Retirement Residence to the north, which contributes to the overall population target of the Town.

The Revised Proposed Development meets the planning objectives of the BSP as it will provide 23 trees and a variety of shrubs and ground cover around the edge of the parking lot. A seating area has been strategically located at the northern edge of the parking lot provides additional outdoor space for residents and employees of the Retirement Residence. This also provides a transition between the parking lot and the Retirement Residence and ensures both uses are integrated and cohesive.

33.5 Natural Features and Areas and Supporting Features and Areas

Section 33.5 of the BSP "Natural Features and Areas and Supporting Features and Areas" provides policy direction on the protection of Bolton's natural heritage system. The following policies are relevant to the Revised Proposed Development:

33.5.1 All lands designated Natural Features and Areas and Supporting Features and Areas as further delineated on Schedule H33c and H33d are subject to Chapter 13, Natural Environment System, of the Future Caledon Official Plan.

33.5.2 Refinements to the Supporting Features and Areas overlay designation may be considered through the development application process.

33.6 Natural Hazards

Section 33.6 of the BSP “Natural Hazards” outlines policies for the protection of the public from natural and human made hazards. The following policies are relevant to the Revised Proposed Development:

33.6.1 The location of hazardous lands are conceptually identified on Schedule H33c and H33d, adapted from TRCA’s regulation mapping, and will be confirmed on a site-by-site basis through the planning process, in accordance with Provincial and TRCA standards and procedures. Hazardous lands are subject to Chapter 16, Natural Hazards, of the Future Caledon Official Plan and TRCA policies.

33.6.2 No development is permitted within TRCA’s Regulated Area until it has been demonstrated that TRCA policies and the requirements of the Conservation Authorities Act and Ontario Regulation 41/24 have been satisfied. A permit is required from TRCA for any development located within TRCA’s Regulated Area, conceptually shown on schedule H33c.

The EIS prepared concludes that the significant valleylands present within the Subject Lands play a limited ecological, biophysical, and landscape role and are associated with the historic Jaffary’s Creek. Existing development within and adjacent to the Subject Lands has modified the landscape significantly from its historic and natural condition such that the valleylands is not applicable. The Revised Proposed Development is minor in nature and is considered accessory to the Retirement Residence. Accordingly, it is GEI’s opinion that there is no reasonable alternative location outside of the significant valleyland for the Revised Proposed Development. The Revised Proposed Development will not degrade or threaten the significant valleylands present within the Subject Lands further than their current state and there will be no direct or indirect negative impacts from the proposed development to the significant valleyland.

Through the EIS and the supporting Geotechnical Assessment Memo prepared by WSP, it has been demonstrated that the proposed development in minor in nature will pose little risk to public health and safety, from a natural hazard perspective, which can be mitigated through engineering and geotechnical standards.

Please refer to the EIS and Geotechnical Report for further details on how potential impacts on the natural heritage and natural hazard features and their associated functions will be avoided or minimized through the application of the protection, mitigation and enhancement measures.

4.0 ANALYSIS AND CONCLUSION

Based on our review of the applicable land use planning policy framework and the supporting application materials, it is our opinion the Revised Proposed Development and associated applications for Official Plan Amendment and Zoning By-law Amendment are based on good planning principles.

The Revised Proposed Development contributes to a diversity of land uses within a Neighbourhood Area and will support an existing use that accommodates people at all stages of life. The additional parking facilities will be used by residents, visitors, and employees of the Retirement Residence and will improve access and accessibility for older persons within the community. The proposed development utilizes the existing road network, providing residents, visitors, and employees with access to a larger transportation network to and from the Retirement Residence. No long-term environmental harm is anticipated as the parking lot has been designed to efficiently use land with minimum impact on the surrounding area and natural heritage functions on the site as maintained by the EIS.

Based on the items indicated above and discussed within this Letter, it is our opinion that the Revised Proposed Development is consistent with the PPS and conforms to ROP, Town of Caledon Official Plan, 1978, FCOP and the BSP. It is our opinion that the proposed development and associated planning applications represent good planning principles and should proceed through the applicable development process as prescribed by the *Planning Act*.

Yours Truly,

Weston Consulting

Per:



Darrin Cohen, MCIP, RPP
Senior Planner

c. King Station GP Inc. and King Station Facility Inc.,