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

via email: Alicia.west@caledon.ca

Attention: Alicia West
Senior Planner, Planning and Development

Dear Alicia West:

RE: Land Use Compatibility Letter
Innis Lake Secondary Plan and Tertiary Plan (Phase 1)

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for Mattamy (Innis Lake) Limited and 2420428 Ontario Limited (“Innis Lake Secondary Plan Area Landowners”). The Innis Lake Secondary Plan Area Landowners are proposing a privately initiated Secondary Plan (“SP”) through an Official Plan Amendment (“OPA”) to amend the Town of Caledon Official Plan to create a more detailed planning framework and urban land use designations for a portion of the approved new community area. The lands subject to the OPA application are bounded by Mayfield Road to the south, Innis Lake Road to the west, Centreville Creek Road to the east and Healey Road to the north and are comprised of land totaling approximately 409 hectares or 1,010 acres (the “Innis Lake SP Area”). The Innis Lake Secondary Plan Area Landowners own approximately 98 hectares (242 acres) of land or 25% of the land within the Innis Lake SP Phase 1 area.

The western boundary of the Innis Lake SP Area is adjacent to a future employment area as designated in the Future Caledon Official Plan. As such, the Town has requested that a Land Use Compatibility Study be prepared to ensure that the development of the lands are appropriate. The purpose of this letter is to address land use compatibility between the proposed residential community and the surrounding land use context, in accordance with the applicable provincial and municipal policy framework.

1.0 Subject Lands and Surrounding Context

The Subject Lands are located within the Regional Urban Boundary as established through the Region of Peel Municipal Comprehensive Review and are designated within the recently approved Future Caledon Official Plan as a New Community Area, requiring the preparation of a secondary plan prior to any development occurring on the lands.

The Innis Lake SP Area is intended to be developed as a sustainable, complete community offering a diversity of land uses, housing options, and community amenities. The majority of the SP Area will be designated as Neighbourhood Area, permitting ground-oriented and low-rise residential uses. Higher density uses are planned along major arterial roads within Urban Corridor designations, which will contribute to transit-supportive densities and ground-floor retail and service uses. The highest density development is planned within the Neighbourhood Centre at the northwest of Centreville Creek Road and Mayfield Road intersection, which will serve as a mixed-use focal point for the community. Complementary institutional, commercial, office, and recreational uses are integrated throughout the plan to support a walkable, complete community.

The Innis Lake Secondary Plan Area Landowners are proposing a Tertiary Plan within the Phase 1 portion of the Innis Lake SP Area to further implement the SP to build a community that is complete, coordinated, healthy, high quality, and sustainable. The Tertiary Plan establishes the vision and land use study to guide new development, addressing the integration of development, land use, and development standards into a cohesive planning framework consistent with the Innis Lake Secondary Plan land use plan. The Phase 2 lands, comprising the northern portion of the Innis Lake SP Area, will be subject to a separate tertiary plan process.

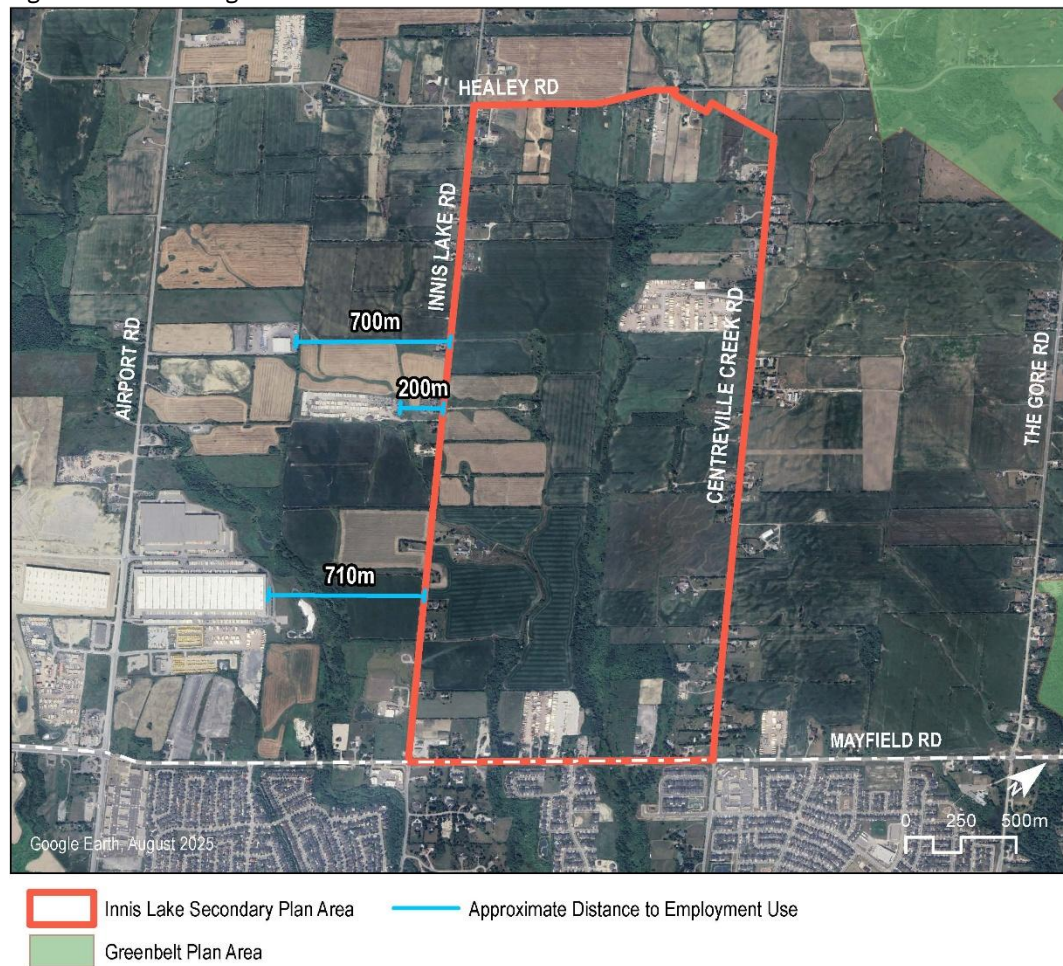
The Innis Lake SP Area is surrounded by the following land uses:

- **North:** Beyond Healey Road — agricultural uses, rural residential dwellings, and the planned Highway 413 corridor.
- **East:** Beyond Centreville Creek Road — agricultural uses, rural residential dwellings, and the proposed Wildfield Village Secondary Plan area (POPA-2024-0010), which is a planned future residential community.
- **South:** Beyond Mayfield Road — City of Brampton residential dwellings.
- **West:** Innis Lake Road forms the western boundary of the secondary plan area. Beyond Innis Lake Road, the existing land uses are agricultural and rural residential in character; however, those lands carry a planned Employment Area designation under the Future Caledon Official Plan, representing the planned long-term land use for the area.

Of the surrounding interfaces identified above, only the western boundary, adjacent to the planned Employment Area, results in land use compatibility consideration. The southern, eastern, and northern residential interfaces (excluding Highway 413) do not involve major facilities and present no land use compatibility concerns requiring assessment. The planned Highway 413 corridor to the north is addressed separately in Section 3.0 of this letter.

Beyond the planned Employment Area designation, three existing employment-related operations are located further to the west (refer to Figure 1): an excavating business approximately 200 metres west of the secondary plan boundary, a truck parking business approximately 700 metres west of the boundary and an existing industrial operation approximately 710 metres west of the boundary.

Figure 1: Surrounding Context



2.0 Policy Framework

2.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 (“PPS 2024”) is the governing provincial land use policy instrument under the *Planning Act*. All planning decisions must be consistent with the PPS 2024.

The PPS 2024 contains policies that establish the framework for land use compatibility between employment uses and sensitive land uses (such as residential uses). On the employment side, Policy 2.8.1.1(e) directs planning authorities to address land use compatibility adjacent to employment areas by providing appropriate transitions to sensitive land uses. Policy 2.8.2.1 requires planning authorities to protect, preserve, and plan for all employment areas for current and future uses. Policy 2.8.2.3 establishes that planning authorities shall designate, protect, and plan for employment areas in settlement areas, including providing “appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.” Policy 2.8.2.4 references Policy 3.5 as the applicable compatibility framework for the interface between employment areas and sensitive land uses.

The primary provincial land use compatibility standard is found in Policy 3.5.1:

“Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.”

Policy 3.5.2 adds that where avoidance is not possible, planning authorities shall protect the long-term viability of existing or planned industrial facilities from encroachment by ensuring that adjacent sensitive land uses are only permitted if potential adverse effects on both the sensitive use and the industrial facility are minimized and mitigated in accordance with provincial guidelines, standards, and procedures.

The provincial guidelines referenced in Policies 3.5.1 and 3.5.2 are the MECP D-Series Guidelines, discussed in Section 2.2 below.

2.2 MECP D-Series Guidelines

The Ministry of the Environment, Conservation and Parks (“MECP”) D-Series Guidelines were issued in July 1995 to address compatibility between various types of facilities and sensitive land uses. Of the full suite of D-Series Guidelines, three are relevant to the Innis Lake SP context: D-1 and D-6.

D-1 – Land Use Compatibility is the parent guideline establishing the general land use compatibility framework. D-6 explicitly states that it is “a direct application of Ministry Guideline D-1,” meaning D-1’s provisions govern when and how the guidelines apply.

D-6 – Compatibility Between Industrial Facilities and Sensitive Land Uses provides the technical framework specific to industrial facilities. D-6 establishes a classification system for industrial operations based on their potential for adverse effects:

- Class I: Small-scale operations with minimal off-site impacts. Potential area of influence of 70 metres; minimum separation distance of 20 metres.
- Class II: Medium-scale operations with periodic off-site impacts. Potential area of influence of 300 metres; minimum separation distance of 70 metres.
- Class III: Large-scale operations with frequent off-site impacts. Potential area of influence of 1,000 metres; minimum separation distance of 300 metres.

These classifications establish two key geographic concepts. The *potential area of influence* is the larger area within which compatibility must be considered, acting as a “flag” for municipalities. Section 4.5.1 of D-6 provides that no sensitive land uses shall be permitted within the actual or potential influence area without evidence demonstrating the absence of a problem. As such, the onus is on the proponent of the sensitive use to prove compatibility. The *minimum separation distance* is the smaller, more restrictive zone within which more stringent requirements apply under D-6 Section 4.10, including comprehensive technical assessment and, where mitigation at the industrial source is proposed, explicit consent from the industrial operator.

Where a new sensitive land use is proposed within the potential influence area of an existing industrial facility, D-6 Section 4.5.1 places the onus on the proponent of the sensitive use to provide evidence demonstrating the absence of a compatibility problem. The D-Series Guidelines' classification system and associated separation distances accordingly provide the framework for assessing the existing employment operations west of the Innis Lake SP Area, as addressed in Section 3.2 of this letter.

2.3 Future Caledon Official Plan

The Future Caledon Official Plan ("Future Caledon OP") establishes the following policies governing land use compatibility within the Town:

Policy 8.3.1 mirrors the direction of Policy 3.5.1 of the PPS 2024, requiring that major facilities and sensitive land uses be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise, and other contaminants, minimize risk to public health and safety, and ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

Policy 8.3.2 directs the Town to plan for and develop employment and industrial uses near and adjacent to major goods movement facilities and corridors, including highways, rail facilities, airports, haul routes, major truck terminals, and major facilities, so as to serve as a transition buffer with sensitive uses.

Policy 8.3.3 provides to protect the long-term operational and economic viability of existing or planned industrial, manufacturing, or other major facilities from encroachment, the planning and development of adjacent sensitive land uses is only permitted if potential adverse effects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial or major facilities are likewise minimized and mitigated in accordance with provincial guidelines, standards, and procedures.

3.0 Land Use Compatibility Assessment

3.1 Western Interface: Planned Employment Area

The primary land use compatibility consideration for the Innis Lake SP Area is the lands within the Employment Area designation to the west of Innis Lake Road, as established in the Future Caledon Official Plan. Currently, those lands are primarily agricultural and rural residential uses and do not have approved development applications or established employment operations (except as noted in the following Section 3.2). The ultimate form, scale, and nature of employment development on those lands have not yet been determined.

The Provincial D-6 classification framework, which establishes potential areas of influence and minimum separation distances based on the nature and scale of the industrial use, cannot be applied at this stage because the employment uses have not been approved, established, or even applied for. As D-6 Section 4.1.2 states, the actual area of influence for a particular facility is site-specific. Where the facility and its operational characteristics are unknown, a site-specific compatibility study is not possible.

In our opinion, the appropriate approach is for the Innis Lake SP to establish the residential land use framework and require, through policy, that future Zoning By-law Amendment (“ZBA”) and Draft Plan of Subdivision applications for residential lands falling within the potential area of influence of the planned Employment Area be subject to a Land Use Compatibility Study prepared in accordance with the MECP D-6 Guideline as a condition of approval (generally within 300 metres of the boundary of the employment area designation). The final area of influence will be determined based on the nature and classification of the employment uses established or proposed at the time of those future applications.

This approach is consistent with Future Caledon OP Policy 8.3.3, which requires that adverse effects on both the sensitive land use and the major facility be minimized and mitigated. Deferring the full technical assessment to the ZBA and Draft Plan stage, when the uses, siting, and built form on one or both sides of the interface are defined, is the appropriate response to the policy requirements at this stage of the planning process.

It is also in our opinion the responsibility of future employment development applications on the planned Employment Area lands to demonstrate compatibility with the adjacent residential community at the time of their respective approvals. This approach is standard practice for employment development applications proposed adjacent to planned or existing sensitive land uses.

3.2 Western Interface: Existing Employment Operations

Three existing employment-related operations are located west of the secondary plan boundary: an excavating business approximately 200 metres west of the boundary, a truck parking business approximately 700 metres and an existing industrial operation approximately 710 metres west of the boundary. All three are separated from the proposed residential community by Innis Lake Road, which forms an intervening land use buffer.

Consistent with Future Caledon OP Policy 8.3.2, the planned Employment Area designation serves a transition buffer function between the sensitive residential uses to the east and the existing employment operations further to the west.

As the Innis Lake Secondary Plan constitutes a new sensitive land use proposal, D-6 Section 4.5.1 requires the proponent to demonstrate compatibility with these existing operations. The D-6 classification framework provides the basis for that assessment. It should be noted that the classification of each existing use, as described in the following paragraphs, represents a best estimate for the purposes of this letter and should be confirmed through a formal land use compatibility study prepared by a qualified professional.

The existing industrial operation located approximately 710 metres west of the secondary plan boundary is consistent with a Class I or Class II industrial use. Class I facilities carry a potential influence area of 70 metres and Class II facilities carry a potential influence area of 300 metres. At a separation distance of 710 metres, the proposed residential community lies well beyond the potential influence area under either classification. Accordingly, no land use compatibility study is required in relation to this operation, and no further mitigation measures are warranted.

The truck parking business located approximately 700 metres west of the boundary is consistent with a Class I facility. Truck parking operations are generally low-intensity uses with limited potential for off-site noise, odour, or other contaminant impacts beyond the immediate property. At 700 metres, the proposed residential community lies well beyond the Class I potential influence area of 70 metres. No land use compatibility study is required in relation to this operation and no further mitigation measures are warranted.

The excavating business located approximately 200 metres west of the secondary plan boundary is conservatively treated as a Class II facility for the purposes of this assessment, given the nature of earth-moving and excavating operations and the potential for off-site noise and dust impacts during active operations. Class II facilities carry a potential influence area of 300 metres and a minimum separation distance of 70 metres. At approximately 200 metres, the excavating business falls within the Class II potential influence area but beyond the minimum separation distance of 70 metres.

The proposed residential lands at the western edge of the Innis Lake SP Area that fall within the 300-metre potential influence area will accordingly be required to complete a Land Use Compatibility Study in accordance with the MECP D-6 Guideline as a condition of future ZBA and Draft Plan of Subdivision applications. The study will assess whether the separation distance and any intervening land uses, including Innis Lake Road and the planned Employment Area designation, are sufficient to demonstrate no adverse effects, or whether additional mitigation measures are required.

3.3 Northern Interface: Planned Highway 413 Corridor

The planned Highway 413 corridor is located to the north of the Innis Lake SP Area, beyond Healey Road. As a provincially planned major transportation infrastructure corridor, Highway 413 constitutes a future major facility as per PPS 2024 Policy 3.5.1.

The Future Caledon OP addresses the Highway 413 corridor through a Focused Analysis Area and NWGTA Transmission Corridor Narrowed Area of Interest framework, recognizing the planning implications associated with the corridor. Future ZBA and Draft Plan of Subdivision applications for residential lands in the northern portion of the Innis Lake SP Area that fall within the area of influence of the highway corridor will be required to address noise and other transportation-related compatibility matters through appropriate technical studies as a condition of approval, consistent with provincial noise guidelines and Future Caledon OP policy. The Phase 2 tertiary plan process will further address the detailed planning of the northern lands in relation to the Highway 413 corridor.

4.0 Summary and Conclusions

In our opinion, the proposed Innis Lake Secondary Plan is consistent with PPS 2024 Policies 3.5.1 and 3.5.2, and conforms to the land use compatibility policies of the Future Caledon Official Plan, including Policies 8.3.1, 8.3.2, and 8.3.3.

The principal land use compatibility interface is the planned Employment Area designation west of Innis Lake Road. As the ultimate employment uses on those lands have not been determined, a site-specific land use compatibility study at the secondary plan stage is not

possible. The appropriate mechanism is for secondary plan policy to require Land Use Compatibility Studies prepared in accordance with the MECP D-6 Guideline as a condition of future ZBA and Draft Plan of Subdivision applications for residential lands falling within the potential area of influence of the Employment Area. Future employment development applications on those lands will additionally be required to demonstrate compatibility with the adjacent residential community at the time of their respective development approvals.

The three existing employment operations west of the secondary plan boundary are separated from the proposed residential lands by Innis Lake Road and the planned Employment Area designation, which serves the transition buffer function contemplated by Future Caledon OP Policy 8.3.2. As determined by D-1 Section 2.3.1, the D-Series Guidelines are not triggered by those existing uses given that no new planning approvals are being sought by those operations and these uses are beyond the separation distances based on their classification. Any compatibility considerations will be addressed through the technical studies required at the ZBA and Draft Plan stage.

The planned Highway 413 corridor will be addressed through the Phase 2 tertiary plan process and through future ZBA and Draft Plan applications for residential lands in proximity to the corridor.

It is our opinion that the proposed Innis Lake Secondary Plan represents good planning and is in the public interest with respect to land use compatibility.

Yours very truly,
Malone Given Parsons Ltd.



Jack Wong, MCIP, RPP