

September 8, 2026

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August 19, 2026

MGP File: 19-2801

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

Attention: Samantha Yeung
Community Planner, Planning Services

Dear Ms. Yeung:

RE: Request for Temporary Use Zoning By-law Amendment
12541 and 12577 Airport Road, Caledon
8181926 Canada Inc. ("Nishan GTA Inc.")
Updated Planning Opinion Letter
Town File No.: RZ 2021 0011

On behalf of our client, Nishan GTA Inc., we are pleased to provide this letter in support of a Temporary Use By-law for the lands located at 12541 and 12577 Airport Road in the Town of Caledon (the Subject Lands). Figure 1 shows the Subject Lands and Table 1 provides the legal description. This letter provides an updated planning rationale for a Temporary Use By-law to permit commercial vehicle parking for three years on the Subject Lands. Ultimately this letter demonstrates that the proposed temporary use is appropriate for the Subject Lands and is compatible with surrounding land uses.

Figure 1 - Aerial of Subject Lands and Surrounding Uses



Subject Lands: 12541 and 12577 Airport Road, Caledon

Source: Malone Given Parsons Ltd., Google Earth Imagery 2026

Table 1 - Legal Description of Property

#	Party to:	Legal Description	Municipal Address	Size (ha)
1	8181926 Canada Inc.	PT LT 3 CON 1 ALBION DES PTS 1,3 PL 43R29515 TOWN OF CALEDON PIN: 143480433	12541 Airport Rd.	10.7
2	8181926 Canada Inc.	PT LT 3 CON 1 ALBION DES PT 7 PL 43R29515 TOWN OF CALEDON PIN: 143480435	12541 Airport Rd.	0.8
3	8181926 Canada Inc.	PT LT 3 CON 1 ALBION AS IN AL22166 TOWN OF CALEDON PIN: 143480010	12577 Airport Rd.	0.4

Site Context and Surrounding Uses

The lands are comprised of three parcels on the east side of Airport Road, approximately 1.5 km north of Mayfield Road. The Subject Lands are in the Town of Caledon just north of the Tullamore Industrial/Commercial Centre.

The Subject Lands are 11.9 hectares with approximately 315 m of frontage on Airport Road. The lands are used for agricultural purposes. 12577 Airport Road is currently occupied by a single detached dwelling and 12541 Airport Road has a single detached dwelling as well as two farmhouse structures and access to the agricultural area on site.

The lands front onto Airport Road and are surrounded by predominantly agricultural uses with some industrial uses. The surrounding uses are summarized as follows:

To the north

- Truck trailer parking
- Agricultural

To the south

- Agricultural
- Single-family dwelling
- Industrial (trucking yard)

To the east

- Agricultural
- Single-family dwellings

To the west

- Agricultural
- Single-family dwelling

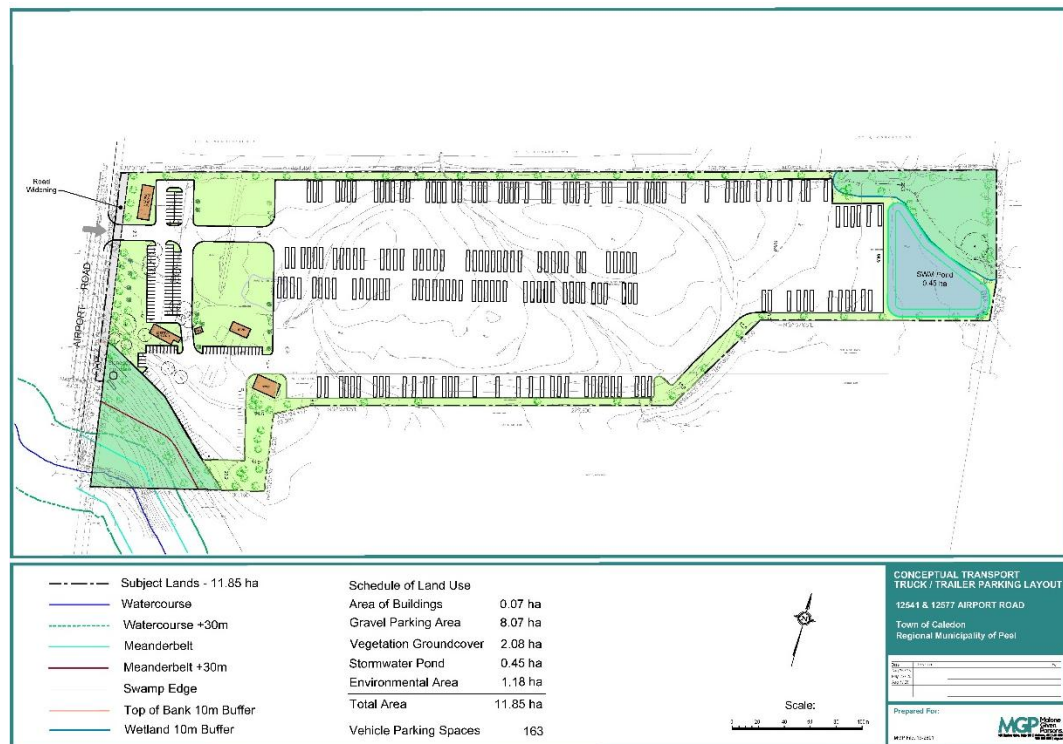
The Subject Lands are just north of the Tullamore Secondary Plan area, which is predominantly employment lands. There are employment and industrial uses to the south (~400m) of the Subject Lands on both sides of Airport Road including numerous logistics facilities.

Temporary Use Proposal

The proposed development consists of parking for transport trucks / trailers on the Subject Lands, accompanied by associated landscaping treatment within the site and along the property lines that provides a buffer to the surrounding uses. The existing access at 12577 Airport Road will generally be maintained at its location and widened to accommodate access/egress for transport trucks /trailers. The existing driveway to the south (12541 Airport Road) will be maintained and will only provide access to the existing house. The development includes the retention of all the existing structures. In addition, three acoustic barriers will be installed in order to mitigate any noise that is generated from the proposed use on the surrounding uses.

Further to comments received from the Town, Region, and TRCA, the Concept Plan has been revised to incorporate a stormwater management pond (approximately 0.45 ha) at the northeast portion of the site, together with an associated private storm sewer system. The revised Concept Plan provides for 163 vehicle parking spaces, with the balance of the Subject Lands comprising gravel parking area, vegetation groundcover, and an environmental area associated with the existing natural heritage features. There are existing natural heritage features at the front (west, along the Airport Road frontage) and rear (east) portions of the property, which are being protected in accordance with the recommendations of the Natural Heritage Evaluation. Figure 2 illustrates the revised conceptual layout for the site.

Figure 2 – Conceptual Site Plan



Source: Malone Given Parsons Ltd.

Planning Context

Provincial Planning Statement (PPS 2024)

The Provincial Planning Statement 2024 (the “PPS 2024”) came into effect on October 20, 2024, replacing the Provincial Policy Statement 2020 and the Growth Plan for the Greater Golden Horseshoe. The PPS 2024 is issued under Section 3 of the Planning Act and establishes policies with which all planning decisions must be consistent.

Under the PPS 2024, the Subject Lands are within an area designated for employment purposes. Employment areas are areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities.

The PPS 2024 directs that land use patterns within settlement areas be freight-supportive (Policy 2.3.1.2(e)). The proposed temporary commercial truck and trailer parking lot directly supports freight movement by providing secured staging and storage capacity for transport trucks and trailers that service the warehousing and logistics operations of the surrounding employment area, including the Tullamore Industrial/Commercial Centre to the south. The proposed temporary use is accordingly consistent with the PPS 2024’s freight-supportive objectives.

Policy 2.8.2.1 directs planning authorities to plan for, protect and preserve employment areas for current and future uses, and Policy 2.8.2.2 further directs that employment areas located in proximity to major goods movement facilities and corridors be protected for employment uses that require those locations. The Subject Lands are situated along Airport Road, which forms part of the broader goods movement network serving the surrounding employment area. The proposed temporary use supports the employment function of the area and does not compromise the long-term protection of the Subject Lands for employment purposes.

The proposed temporary use is consistent with the PPS 2024.

Future Caledon Official Plan

The Subject Lands are designated New Employment Area on Schedule F1, Urban System, of the Future Caledon Official Plan (the “Future Caledon OP”).

The New Employment Area designation identifies lands that will be developed for employment uses in the future. As stated in Section 23.6 of the Future Caledon OP, development is not permitted on New Employment Area lands until a secondary plan is adopted and in effect, at which time the New Employment Area designation will be replaced with one or more detailed land use designations. It should be noted that a future application for a scoped secondary plan is anticipated for the Subject Lands and surrounding New Employment Area lands.

The proposed temporary use is well-suited for the interim period while the future secondary plan process is undertaken. The three-year term of the Temporary Use By-law allows the

Subject Lands to contribute productively to the local economy during this transitional period. The proposed truck and trailer parking provides a practical and productive interim use of lands that are designated for employment purposes, supporting the operational needs of the surrounding employment area.

In our opinion, the proposed temporary use does not prejudice the long-term intent of the Future Caledon OP and is consistent with the New Employment Area designation.

Caledon Zoning By-law 2006-50

Town of Caledon Zoning By-law 2006-50 zones the Subject Lands as *Agricultural* (A1) and *Environmental Policy Area 2* (EPA2). The Agricultural zone permits a range of agricultural-related commercial and industrial uses. The lands zoned EPA2 are located at the southwest portion of the property near the existing watercourse.

Temporary Use Zoning By-law

The provision of a temporary zoning by-law to permit the proposed use is governed by Section 39(1) of the *Planning Act*. It states that:

“The council of a local municipality may, in a by-law passed under section 34, authorize the temporary use of land, buildings or structures for any purpose set out therein that is otherwise prohibited by the by-law.”

Temporary use by-laws are not permitted to exceed 3 years from the day of the passing of the by-law unless Council grants an extension (Section 39(2) and (3)).

Further to the provisions of the Planning Act, Section 25.1.11a) of the Future Caledon Official Plan states that:

“The Town may, in a zoning by-law, authorize the temporary use of land, buildings or structures for any purpose set out therein that is otherwise prohibited by the zoning by-law for renewable periods up to three years. A temporary use by-law will only be enacted where it has been deemed that the use is appropriate in the short-term and would not hinder the eventual planned use of the land.”

Section 25.1.11b) further states:

“In considering the enactment of a temporary use by-law, Council will be satisfied that the proposed temporary use:

- i. is in general conformity with the intent and policies of this Plan;*
- ii. is compatible with adjacent lands uses;*
- iii. is temporary in nature, appropriate for a limited time span and can be terminated when the authorizing by-law expires;*
- iv. avoids, mitigates or minimizes adverse effects or negative impacts on the Natural Environmental System;*
- v. has sufficient services such as water, sewage disposal and roads; and,*
- vi. does not adversely impact traffic or transportation facilities in the area and provides adequate on-site parking facilities.”*

MGP has assessed the proposed temporary use against the prescribed criteria as listed in Section 25.1.11b) to test the consistency of the proposed use with the requirements that the Town uses for temporary use by-laws. The following demonstrates how the proposed temporary use meets these requirements.

i) Is in general conformity with the intent and policies of this Plan.

Response: The Future Caledon Official Plan establishes a vision for Caledon as “a sustainable, healthy, connected and complete community with a thriving local economy” (Section 2.2). A guiding principle of the Future Caledon OP is to support strategic and innovative economic opportunities, specifically, to enable the strategic development of the Town’s employment lands to maximize long-term job growth and economic prosperity (Sections 2.3.12 and 8.0).

Policy 8.2.1 of the Future Caledon OP directs the Town to plan for and protect employment areas for a variety of employment uses, and to accommodate a variety of employment uses as locational and market trends require. The significant growth of e-commerce, on-demand delivery, and logistics activity has created an increase in demand for truck and trailer parking facilities to support warehousing and distribution operations. The proposed temporary commercial truck and trailer parking lot responds directly to this market trend and supports the logistics and warehousing sector that is well-established in the surrounding employment area, including the Tullamore Industrial/Commercial Centre to the south. The temporary use serves as an appropriate interim employment use that supports the function and viability of the broader employment area while the Subject Lands await permanent development.

The Subject Lands are designated New Employment Area on Schedule F1, Urban System, of the Future Caledon OP. Employment Areas are identified as a key component of the Town's Urban System and are described as places of business and economic activity that are vital to maintaining a healthy economy and accommodating future jobs and economic opportunities (Section 23.0). As discussed above, this designation identifies the Subject Lands for future employment development pending the adoption of a secondary plan.

It is our opinion that the application can proceed in advance of the secondary plan without undermining the Town’s ability to establish a logical and orderly development pattern for the broader employment area, and represents good planning.

In our opinion, the proposed temporary use is in general conformity with the intent and policies of the Future Caledon OP.

ii) Is compatible with adjacent land uses.

Response: The proposed commercial parking lot is compatible with adjacent land uses. The Subject Lands are adjacent to Apra Truck Lines and Apra Warehouse, an existing truck and trailer parking/warehousing operation, immediately to the north, and numerous industrial buildings/uses including a logistics building to the south (Maersk Logistics & Services Inc.), Loblaws, Pepsico and NLS Distribution, all of which represent established employment uses of a similar character to the proposed temporary truck and trailer parking operation.

To the east and west, and the balance of the lands to the north and south, the surrounding lands contain current agricultural operations and single-family dwellings; however, these lands are designated New Employment Area under the Future Caledon OP and are planned for future employment development. The proposed temporary use is compatible with the planned employment character intended for the broader area over the long term.

In regards to the former agricultural operations, Beacon Environmental prepared an Agricultural Impact Assessment (dated March 2021) which evaluates the potential for land use conflict with surrounding properties. Notwithstanding that the surrounding lands are planned for employment uses, the Assessment concludes that the proposed temporary parking use does not pose an increased potential for land use compatibility conflict. The proposed landscape buffer along the property lines will provide a natural screen appropriate to the current rural and employment context.

In our opinion, the proposed temporary use is compatible with adjacent land uses.

iii) Is temporary in nature, appropriate for a limited time span and can be terminated when the authorizing by-law expires.

No new buildings or structures are proposed as part of this temporary use application. The proposed construction includes installation of a gravel parking lot, a stormwater management pond, as well as a private storm sewer system. No additional sanitary or water service connections are proposed. Any proposed grading is made to preserve the existing landforms and grades to the extent possible, which is done by minimizing any grading disturbances along proposed site boundaries. This will not affect the usability of the site in the long-term for another use and is therefore not permanent nor difficult to terminate.

Additionally, the Agricultural Impact Assessment provides appropriate mitigation measures and recommendations for the site to be reverted back to agricultural use. The recommendations include that aggregates used for the base of the parking area be removed, decompaction of soils be undertaken, and topsoil replaced and amended if required.

iv) Avoids, mitigates or minimizes adverse effects or negative impacts on the Natural Environmental System.

Beacon Environmental has prepared an Environmental Impact Study (EIS) to assess the potential impacts of the development proposal on natural heritage features, including seasonal field investigations, a headwater drainage feature assessment, breeding bird surveys, and a review of habitat for Redside Dace.

Natural heritage features on the Subject Lands include a marsh community and associated drainage feature, and Salt Creek and its valleylands at the southwest corner of the property. The EIS identifies vegetation protection zones/buffers of 10 m for wetlands, 10 m for top of bank, and 30 m for Salt Creek and its meander belt, which have informed the design of the revised Concept Plan. Aside from the proposed stormwater outfall to Salt Creek, no development is proposed within the natural heritage features or their buffers.

The stormwater management system has been designed to protect water quality and habitat for Redside Dace, a species regulated under the federal Species at Risk Act. The system includes an oil-grit separator designed to meet Level 1 enhanced treatment (80% TSS removal, 90% capture), with the stormwater pond providing further attenuation and treatment prior to controlled discharge to Salt Creek through an underground pipe designed to provide sufficient cooling of stormwater prior to discharge, given Redside Dace's sensitivity to temperature.

With the implementation of the mitigation measures recommended in the EIS, consultation with the appropriate agencies, and the issuance of any necessary permits and authorizations, the proposed development avoids, mitigates, and minimizes adverse effects on the Natural Environmental System, consistent with Policy 25.1.11(b)(iv) of the Future Caledon OP.

v) Has sufficient services such as water, sewage disposal and roads.

The proposed temporary use does not require water or sanitary service connections. No potable water supply or sewage disposal infrastructure is proposed or required for the operation of the commercial parking lot. The Subject Lands are accessed via Airport Road, which constitutes an existing public roadway with sufficient capacity to serve the proposed temporary use. A stormwater management pond and private storm sewer system is proposed to manage on-site drainage. In our opinion, the Subject Lands have sufficient services to support the proposed temporary use.

vi) Does not adversely impact traffic or transportation facilities in the area and provides adequate on-site parking facilities.

The commercial parking lot is not anticipated to adversely impact traffic in the area. NexTrans Consulting Engineers completed an updated Traffic Impact Study for the proposed transport truck/trailer parking lot to assess the traffic implications of the proposed temporary use in light of the revised Concept Plan.

Under interim (temporary use) conditions, the site is projected to generate 37 two-way trips (19 inbound/18 outbound) during the AM peak hour and 60 two-way trips (35 inbound/24 outbound) during the PM peak hour. This traffic results in only a marginal increase in overall intersection v/c ratios and delay at the study area intersections relative to future background conditions; the operational deficiencies identified at the Airport Road/Old School Road/Healey Road and Airport Road/Mayfield Road intersections are primarily attributable to background traffic growth in the area rather than the proposed development. The proposed site access itself is projected to operate with residual capacity and an acceptable level of service during both peak hours.

The site will continue to be accessed through one full movement driveway via Airport Road, positioned to balance the Region of Peel's access spacing criteria against the site's constrained frontage and topography. Based on the MTO Design Supplement to the TAC Geometric Design Guide, the projected PM peak hour left-turn demand of 10 vehicles per hour falls outside the applicable warrant threshold; accordingly, a dedicated left-turn storage lane is not required, with the planned centre two-way left-turn lane on Airport Road

able to accommodate left-turning vehicles entering the site. Based on the analysis and recommendations of the updated Traffic Impact Study, the proposed development will not have an adverse impact on traffic.

The proposed temporary use is to provide commercial parking. Other uses are not proposed, therefore additional parking provisions do not apply. The revised Concept Plan provides for 163 vehicle parking spaces, consistent with the interim condition assessed in the updated Traffic Impact Study.

Urban Design

The proposed development will also contribute the Town's overall urban design vision. In 2017, Caledon established Comprehensive Town-Wide Design Guidelines, which provide sustainable and creative recommendations in both rural and urban Caledon that protect and enhance the natural environment. The Town of Caledon encourages all new development to meet the requirements of the Town-Wide Design Guidelines.

Built Form

The proposed development will retain all existing structures on the subject site and only acoustic barriers are proposed to be constructed, which are well set back on the Subject Lands. Section 13.2 of the Town-Wide Design Guidelines speaks to the Commercial and Industrial Uses in the Rural Context. The design standards for these uses include limiting access to a single access point (13.2c) and maintaining and enhancing existing cultural heritage and farm features/structures (13.2d).

The rural character of the site will be maintained through the retention of the existing buildings and access/egress to the proposed parking area will be limited to a single driveway. The proposed access is in the same location as the existing driveway and will be widened to accommodate transport trucks and trailers.

Setbacks

The proposed transport truck and trailer parking development will respect the existing setbacks applicable by the in-force zoning. The temporary use zoning bylaw amendment does not propose to change the existing yard, driveway, or parking space setbacks. Refer to the submitted Zoning Matrix for more detail.

Landscaping

A landscape plan has been prepared for the proposed development and illustrates the landscaping treatment within the site and along the property lines to provide a buffer to the surrounding uses. The Agricultural (A1) zoning, currently applicable to most of the site, requires 10% minimum landscaped area. The proposed development will provide a landscaped area of 10% or greater, that is detailed within the landscape plan.

The Town-Wide Design Guideline (Policies 13.2l and q) state design requirements to provide naturalized landscaping using diverse native species and to screen parking lots with naturalized landscaping. The detailed landscape plan will provide details of the proposed

planting species and will adhere to the Town's design standards. Furthermore, as shown on the Concept Plan, landscape treatment will be included along the property lines to appropriately screen the parking area from surrounding uses.

Compatibility

The surrounding uses to the site include agricultural, single-family dwellings, and truck and trailer parking. The submitted Agricultural Impact Assessment evaluates the potential conflict of land use with surrounding properties. Based on the report, the proposed development for temporary parking does not pose an increased potential conflict for land use compatibility as the predominant surrounding land use is agricultural.

There are also similar land uses near the proposed development. A trucking transport facility is located to the south and an agricultural use with open storage of trucks at the rear is located to the north. The proposed landscape buffer around the property lines will also provide a natural screen, which is compatible with surrounding rural uses.

Additionally, the Agricultural Impact Assessment provides appropriate mitigation measures and recommendations for the site to be reverted back to agricultural use. The recommendations include that aggregates used for the base of the parking area be removed, decompaction of soils be undertaken, and topsoil replaced and amended if required. This is consistent with the Town-Wide Design Guidelines Section 13.1 which states the key design principles for Caledon's rural area which include preserving the Town's agricultural resources.

Policy 13.2m also requires development to maintain views to the existing dwelling. The site retains the existing dwelling and structures and views to the dwelling from the public right-of-way and adjacent properties will be maintained.

Environment

Section 13.1 of the Design Guidelines also speaks to preserving the integrity of the Town's environmental systems and ensuring compatibility of adjacent agricultural uses. The submitted Natural Heritage Evaluation identifies the natural heritage features within the site. The report provides mitigation measures (i.e. buffers, noise and light effects, sedimentation and erosion control, etc.) to lessen or eliminate potential impacts of the proposed development on the natural heritage system. The proposed development respects the natural heritage system within the site and will adhere to the recommended mitigation measures.

Summary

As demonstrated through the responses above, the proposed temporary use is appropriate for the Subject Lands and is compatible with surrounding land uses. The proposed use of a commercial truck / trailer parking lot would not permanently alter the lands and the existing structures will be retained.

Supporting Documents

In support of the request for the temporary use zoning by-law, please find the following documents enclosed (note: all documents are submitted electronically as per the Town's Electronic Submission Requirements: Planning Applications):

- Updated Planning Opinion Letter (this letter) prepared by Malone Given Parsons Ltd., dated August 19, 2026;
- 1st Submission Comment Response Matrix
- Concept Plan prepared by Malone Given Parsons Ltd., dated August 2026.
- Draft Zoning By-law Amendment prepared by Malone Given Parsons Ltd.
- Zoning Matrix prepared by Malone Given Parsons Ltd.
- Traffic Impact Study prepared by NexTrans, dated August 2026.
- In-Situ Testing prepared by Soil Engineers Ltd., dated May 29, 2026;
- Functional Servicing & Stormwater Management Report prepared by Masongsong Associates Engineering Ltd., dated August 2026.
- Natural Heritage Evaluation prepared by Beacon Environmental, dated March 2021, Revised August 2026.

We look forward to continuing to work with you on this application. Should you have any questions or require additional information, please do not hesitate to contact us.

Yours very truly,

Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP
Principal