

VIA EMAIL

March 18, 2024

Mayor and Members of Council
Town of Caledon
6311 Old Church Road
Caledon East, Ontario L7C 1J6

Attention: Mr. Kevin Klingenberg, Municipal Clerk

Dear Sirs/Mesdames:

**Re: March 19, 2024 Planning and Development Committee Meeting –
Item 7.1
Future Caledon Official Plan – March 2024 Draft
Preliminary Comments on Behalf of 8281 Healey Road GP Ltd.**

Our File: ONE/CAD/22-02

We are the planning consultants for 8281 Healey Road GP Ltd. (care of Beedie) for the Town of Caledon Official Plan Review. 8281 Healey Road GP Ltd. is the owner of approximately 13.56 ha (33.51 ac) of lands within the Town of Caledon (the “Subject Lands”), located at 8281 and 0 Healey Road.

The Subject Lands are subject to a current Site Plan Approval application for a warehouse building (Town file SPA 21-0097). The Subject Lands were subject to a prior Zoning By-law Amendment application (Town File RZ 2020-0007), generally for the realignment of the environmental protection lands.

As part of the Town’s Official Plan Review, several iterations of a Draft Official Plan were released in March 2022, June 2023, August 2023, and February 2024 for public comment. On behalf of the landowner, we submitted comments relating to each draft. Most recently, the Town released the March 2024 draft of the Official Plan, which is recommended for adoption according to Staff Report 2024-0072, dated March 19, 2024. This letter provides preliminary comments as outlined below. We will continue to review the March 2024 Draft Official Plan, and may provide further comments as required.

Based on our review of the Draft Official Plan:

- On Schedule B1 Town Structure, the Subject Lands are shown as Urban Area;
- On Schedule B2 Growth Management, the Subject Lands are shown as Designated Greenfield Area, and located within the Provincially Significant Employment Zone;
- On Schedule B4 Land Use Designations, the Subject Lands are shown as “Refer to Part A, Section 1.2”;
- On Schedule C1 Town Wide Transportation Network, the Subject Lands are shown within the Settlement Area, with frontage along Healey Road which is identified as

- a Town Arterial Road. A Conceptual Collector Road is identified to the west of the Subject Lands, in a north-south direction;
- On Schedule C2 Road Right-of-Way Widths, Healey Road is shown with a 36 m ROW (26 m ROW under current Official Plan);
- On Schedule D1 Natural Environment System, the Natural Features and Areas and watercourse is shown along portions of the Subject Lands; and
- On Schedule D3a Water Resources System Areas, areas of Highly Vulnerable Aquifers are shown within portions of the Subject Lands.

We reiterate our general comments, including:

- **We continue to be concerned with the implications of the draft Official Plan policy framework for the Subject Lands, including the need for flexibility in the design policies and the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies; and**
- **We understand the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). Based on our review, it is unclear what land use designations are planned to be applicable to lands within the Bolton Settlement Area, as no land use plan has been prepared for lands within the Urban System. Section 21 of the Draft Official Plan states, “These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses”, whereby we understand that the Town is projecting that the land use designations will not form a part of this Official Plan. A fulsome and informed review of the policies of Section F can therefore not be completed. In our submission, it is premature to establish policies for land use designations, without identifying where those policies are intended to apply. We suggest that it would be premature to proceed with consideration of the Official Plan without the land use schedules for the Urban System. It is acknowledged in the Town’s comment response that the Bolton Secondary Plan will be updated, however it is unclear why land use policies are proposed for adoption ahead of the conclusion of that process.**

At this time, our preliminary comments for the March 2024 Draft Official Plan are as follows:

- On Schedule C2 Road Right-of-Way Widths, Healey Road is shown with a 36 m ROW, whereas the in-effect Official Plan identifies a 26 m ROW. **We reiterate our comments seeking clarification as to the need for such a significant increase and whether this is based on a specific background study, and implications for existing developments;**
- Policy 21 states “The policies of Part F establish the land use designations and supporting policies to implement the Urban System components of the Town Structure in accordance with the Plan’s vision and guiding principles. These land use designations will be assigned to lands throughout the Urban System through future amendments to this Plan to enable a range of urban land uses.” **We reiterate our general comment and suggest it is premature to approve the Official Plan as drafted, without the land use schedule for the Urban System;**

- Policy 21.2.1 (formerly Policy 21.2.2) states “The Town will undertake detailed reviews of the existing secondary plans for the areas listed above (i.e., areas now within the Urban System of this Plan) and recommend updated land use designations and policies to be incorporated into the framework of this Plan through Town-initiated official plan amendments. More detailed and specific land use designations and policies will augment the land use designations and policies contained in Part F, Urban System, and Part D, Environment and Open Space System, of this Plan.” **We note our general comment above and reserve the opportunity to participate in the detailed review of the existing secondary plans. It is acknowledged that the Town has stated this letter will be considered in relation to the secondary plan process;**
- Policy 23.7.2 b) Prestige Employment Permitted Uses states “Outdoor storage, goods movement and logistics will not be permitted.” **We have continued concern about the prohibition of “goods movement and logistics” uses. This is an undefined term in the Draft Official Plan, and we seek clarification as to what is meant by this term and why it is prohibited.**
- Policy 23.8.2 b) states “Goods movement and logistics uses will not be permitted.” **We reiterate our request for clarification regarding the *goods movement and logistics* as the use is not defined, including why it is prohibited;**
- Policy 23.9.1 a) states the planning objectives for the Goods Movement District designation are to “determine the location and extent of the district through the Goods Movement and Logistics Land Use Strategy, to be completed by the Town” and 23.9.1.b states “provide long-term and stable locations for large scale-warehousing, goods movement and logistics uses.” **We reiterate our request for clarification as to the implications for the Subject Lands where the Goods Movement and Logistics Strategy has not been provided for review and the associated Goods Movement District designation has not yet been determined;**
- Policy 23.9.2 a) states “The following uses may be permitted within the Goods Movement District designation: i) all uses permitted under the General Employment designation; ii) large scale warehousing, goods movement and logistics uses; iii) major office uses and employment-supportive uses; and, iv) open storage, including the storage of containers and truck storage.” The non-policy text under Section 23.9 states “Through the preparation of the required secondary plans, a Goods Movement District designation may be applied as an overlay on top of the General Employment Area designation, which is to be informed by a Goods Movement Trucking Strategy prepared by the Town. The overlay is intended to accommodate large scale warehousing, goods movement and logistics uses including truck parking, container storage and other forms of outdoor storage”. **We reiterate our request for clarification as to whether the Goods Movement District designation overlay removes uses that would otherwise be permitted in the underlying designation and that the Goods Movement District designation “overlay” will not be restricted to only the General Employment Areas designation, since under the current official Plan, “Warehousing and wholesale operations” uses are permitted in the Prestige Industrial Designation.**

We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Rob MacFarlane, MPL, MCIP, RPP
Senior Associate

cc. 8281 Healey Road GP Ltd. (via email)