



Zelinka Priamo Ltd.

LAND USE PLANNERS

VIA EMAIL

March 19, 2024

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

Attention: Kevin Klingenberg, Municipal Clerk

Dear Sirs/Mesdames:

**Re: Planning and Development Committee Meeting – March 19, 2024
Item 7.1 – Future Caledon Official Plan – March 2024 Draft
Preliminary Comments on Behalf of BoltCol Holdings North Inc. and
BoltCol Holdings South Inc.**

Our File: BCL/BOL/22-01

We are the planning consultants for BoltCol Holdings North Inc. and BoltCol Holdings South Inc. (“BoltCol”) for the Town of Caledon Official Plan Review. BoltCol are the owners of approximately 100 ha (249 ac) of lands within the Town of Caledon (the “BoltCol Lands”) to the west of Coleraine Drive, between Mayfield Road and George Bolton Parkway, as well as additional lands at the northwest quadrant of Coleraine Drive and George Bolton Parkway (see full list of municipal addresses for the BoltCol Lands in Appendix A).

The BoltCol Lands are at various stages of approval for employment uses. With the completion of approvals for six buildings to the north and south of the extension of George Bolton Parkway, the focus has turned to the southern portion of the BoltCol Lands down to Mayfield Road, including the approximately 32.3 ha (79.8 ac) vacant portion of the Boltcol Lands, known as the “Boltcol Triangle Lands”, which were recently subject to the Town-initiated OPA 271 and the associated implementing zoning under By-law 2023-054, which are now both in full force and effect.

As part of the Town’s Official Plan Review, for the Draft Official Plans that have been released, we submitted preliminary comments on behalf of BoltCol dated April 19, 2022, July 31, 2023, September 29, 2023 and March 7, 2024. On October 17, 2023 we met with Staff to discuss our preliminary comments dated September 29, 2023. The Town of Caledon released a Draft Official Plan dated March 2024 for public review, which is recommended for adoption according to Staff Report 2024-0072, dated March 19, 2024. We note that as part of Staff Report 2024-0072, Staff Responses were provided for our comments dated March 7, 2024, which are noted below where applicable. On behalf of BoltCol, we have preliminary comments as outlined below, and will continue to review the March 2024 Draft Official Plan in detail and may provide further comments as required.

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

- In the context of draft Policy 1.2.1 that states “The 1978 Official Plan, as amended and in force as of the day before adoption of the Future Caledon Official Plan, remains in effect”. In our comments dated March 7, 2024, we requested clarification as to whether the Draft Official Plan applies to the BoltCol Lands. We note the Staff response to our comments that states “Lands within the Bolton Secondary Plan will be subject to the 1978 Official Plan, as amended. Part B and Part G will apply to lands Townwide”;
- We reiterate our general comment that we are concerned with the implications of the draft Official Plan policy framework for the BoltCol Lands, including the continuation of existing permissions for warehousing, trailer parking and other employment uses as well as the associated employment policies;
- We reiterate our general comment that the Draft Official Plan establishes a number of land use designations applicable to lands within the Urban System (Part F). We note the Staff response to our comments dated July 31, 2023 that states “The introduction of a new OP does not change any previous permissions granted under previous applications. Schedules have been revised. The employment designation policies have been revised to ensure greater clarity.” Based on our review, it remains 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. 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 reiterate our suggestion that Part F be withheld from consideration, or that land use schedules be prepared; and
- For the “Planned Highway 413 and NWGTA Transmission Corridor Protection Area”, which is shown on Schedules A1 Provincial Plan Areas, B4 Land Use Designations and C1 Town-Wide Transportation Network, in our comments dated March 7, 2024, we submitted that the “Planned Highway 413 and NWGTA Transmission Corridor Protection Area” overlay should be removed from the BoltCol Lands. We note the Staff response to our comments that states “Maps have been revised to show the GTA West Preferred Route as provided by the Province, the Town must conform with GTA West Corridor mapping.” We note the Staff response that states “Lands within the Bolton Secondary Plan will be subject to the 1978 Official Plan, as amended. Part B and Part G will apply to lands Townwide”. As Draft Policy 11.12.1 is within Part C of the Draft Official Plan, we request confirmation that Draft Policy 11.12.1 is not applicable to the BoltCol Lands.

In addition to our high-level preliminary comments noted above, we have detailed comments for the March 2024 Draft Official Plan as outlined in Appendix B.

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.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. BoltCol Holdings North Inc. and BoltCol Holdings South Inc. (Via Email)
Pitman Patterson, Borden Ladner Gervais LLP (Via Email)

Appendix A – Municipal Addresses for the BoltCol Lands

- 8399 George Bolton Parkway;
- 8400 George Bolton Parkway;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 0 Coleraine Drive;
- 12210 Coleraine Drive;
- 12226 Coleraine Drive;
- 12258 Coleraine Drive;
- 12300 Coleraine Drive;
- 12366 Coleraine Drive;
- 12400 Coleraine Drive
- 12480 Coleraine Drive;
- 12490 Coleraine Drive;
- 12592 Coleraine Drive;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 0 Mayfield Road;
- 8410 Mayfield Road; and
- 8424 Mayfield Road.

Appendix B – Detailed Comments

Based on our review of the February 2024 Draft Official Plan:

- On Schedule A1 Provincial Plan Areas, the Boltcol Triangle Lands subject to OPA 271 are shown as “Planned Highway 413 Corridor Protection Area (Source: Connecting the GGH: A Transportation Plan for the Greater Golden Horseshoe)”;
- On Schedule B1 Town Structure, the BoltCol Lands are shown as Urban Area with a portion of the lands fronting on Mayfield Road in the southwest corner shown as Planned Highway 413 Transportation Corridor;
- On Schedule B2 Growth Management, the BoltCol Lands are shown as Designated Greenfield Area, within the Provincially Significant Employment Zone. A portion of the lands fronting on Mayfield Road in the southwest corner is shown as Planned Highway 413 Transportation Corridor;
- On Schedule B4 Land Use Designations, the BoltCol Lands are shown as “Refer to Part A, Section 1.2”, while the Boltcol Triangle Lands subject to OPA 271 are shown with an “Other Map Element” described as “Planned Highway 413 and NWGTA Transmission Corridor Protection Area”;
- On Schedule C1 Town-Wide Transportation Network, the BoltCol Lands are shown within the Urban Area and Settlement Area with an east-west Conceptual Collector Road extending west from George Bolton Parkway, along with a Conceptual Collector Road extending from Mayfield Road generally to the west of the BoltCol Lands, which we note is shown as a “Conceptual Collector Road” on Schedule F1 Urban System but is shown as a “Proposed Collector Road” on Figure C4 2051 Town-Wide Transit Network. The Boltcol Triangle Lands subject to OPA 271 are shown as “Planned Highway 413 and NWGTA Transmission Corridor Protection Area”;
- On Schedule C2 Town-wide Road Right-of-Way Widths, Coleraine Drive is shown with a 36 m ROW (36 m ROW under current Official Plan), Mayfield Road is shown with a 50 m ROW (50 m ROW under current Official Plan);
- On Schedule D1 Natural Environment System, the BoltCol Lands are shown as “Refer to Part A, Section 1.2”;
- On Schedule D3 Natural and Supporting Features and Areas, the BoltCol Lands are shown as “Refer to Part A, Section 1.2”; and
- On Schedule D4a Highly Vulnerable Aquifers, areas of Highly Vulnerable Aquifer are shown within portions of the BoltCol Lands.

We have the following detailed comments for the February 2024 Draft Official Plan:

- For Schedule C1 Town Wide Transportation Network and the Conceptual Collector Road extending from Mayfield Road, we note that in response to an associated question from our review of the Draft Caledon MMTMP, Staff advised “The preferred location of A2 extension determined as part of the Transportation Network Feasibility Study for Option 6 and Triangle lands, is through the lands west of Clarkway Tributary. The Town can confirm that the conceptual northerly extension of A2 arterial does not pass through the BoltCol Lands in accordance with OPA 271”. **Accordingly, we reiterate that in our submission Schedule C1 should be updated to clearly show that the Conceptual Collector Road extending from Mayfield Road is to the west of the BoltCol Lands;**

- Policy 5.4.2 states “The Town will establish minimum performance requirements as part of the Green Development Standards process along with guidelines, tools and templates to support compliance.” In response to our comments dated September 29, 2023, Staff responded “The Town’s Green Development Standards are being developed alongside the Official Plan and will be brought to council for endorsement following the adoption of this plan. These standards are designed to ensure best practices in land use planning and building are applied to meet the town’s/ province’s climate goals. These standards have flexibility built in and are tailored to fit different development applications. The requirement is the submission of identified materials as a part of a complete application.” **We reiterate that in our submission, the policies as currently drafted would effectively elevate the Green Development Standards to Official Plan policy. Accordingly, Policy 5.4.2 should be revised to change “establish” to “encourage”, change “requirements” to “standards” and delete “to support compliance”;**
- Policy 7.2.3 states “All development in the Urban System will: ... b) adhere to the design policies in Part F, Urban System.” **We request clarification as to what specific design policies are being referenced;**
- Policy 11.12.1 states “The Planned Highway 413 and NWGTA Transmission Corridor Protection Area identified on Schedule C1, Town-wide Transportation Network, is an overlay designation consisting of a corridor protection area that reflects the Highway 413 Focused Analysis Area (2020) and the Northwest GTA Transmission Corridor Narrowed Area of Interest (2020). a) The Planned Highway 413 and NWGTA Transmission Corridor Protection Area is intended to be protected and refined until such time as the final locations of the Highway 413 Corridor and the Northwest GTA Transmission Corridor are confirmed. b) The final confirmed rights-of-way for the Highway 413 and Northwest GTA Transmission Corridor will be protected indefinitely with the highway lands designated under the Public Transportation and Highway Improvement Act. c) Development within this area will not preclude or negatively affect the planning and/or implementation of the planned corridors for the purpose(s) for which they are identified.” **As noted in our comments dated March 7, 2024, under OPA 271 and the implementing zoning By-law 2023-054 that are applicable to the BoltCol Triangle Lands, there is no Planned Highway 413 and NWGTA Transmission Corridor Protection Area overlay, policies or specific regulations. We note that Staff Report 2023-0321 dated June 13, 2023 for OPA 271 states “The ‘Triangle Lands’, located on the north-west corner of Mayfield Road and Coleraine Drive, were originally excluded from the settlement area in the Regional Official Plan and the Town’s Secondary Plan due to the initial size of the protected area for the GTA West Transportation Corridor. As the GTA West project has advanced, the width of the protected area for the GTA West Transportation Corridor has been reduced (but not removed)” (p. 4). In our comments dated March 7, 2024, we submitted that the “Planned Highway 413 and NWGTA Transmission Corridor Protection Area” overlay should be removed from the BoltCol Lands. We note the Staff response to our comment that states “Maps have been revised to show the GTA West Preferred Route as provided by the Province, the Town must conform with GTA West Corridor mapping.” We note the Staff response that states “Lands within the**

- Bolton Secondary Plan will be subject to the 1978 Official Plan, as amended. Part B and Part G will apply to lands Townwide”. As Draft Policy 11.12.1 is within Part C of the Draft Official Plan, we request confirmation that Draft Policy 11.12.1 is not applicable to the BoltCol Lands;**
- Policy 21.2.1 states “The Town will undertake detailed reviews of the existing secondary plans, or area-specific policies, for the areas listed in Policy 1.2.1 (i.e., areas now within the Urban System of this Plan) and recommend updated land use designations and policies be incorporated into 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.” In response to our comments dated September 29, 2023, Staff responded “This submission will also be considered as part of the ongoing Bolton Secondary Plans Review. That project will update and consolidate the land use policy framework for six secondary plan areas from the existing Official Plan. The new consolidated secondary plan will guide intensification and land use changes in Bolton, especially along the Queen Street corridor. It will be added to the Future Caledon Official Plan through an official plan amendment.” **We reiterate our general comment above and reserve the opportunity to participate in the ongoing review of the existing secondary plans;**
 - Policy 23.7.2 a) Prestige Employment Area Permitted Uses states “The following uses may be permitted within the Prestige Employment Area designation: i) manufacturing, processing and warehousing with no accessory outside storage of goods or materials”, whereas Policy 23.7.2 b) states “Outdoor storage, goods movement and logistics will not be permitted.” **We reiterate our request for clarification as to what is intended by “goods movement and logistics” as the two uses are not defined. In our submission, the Prestige Employment Area designation should continue to permit goods movement and logistics uses;**
 - Policy 23.7.3 a) states “The following discretionary uses may be permitted within the Prestige Employment Area designation: ...” **As many of the uses that are listed are indicated as “may be permitted” under Policy 23.7.2, we reiterate our request for clarification as to the policy intent;**
 - Policy 23.8.2 a) General Employment Area Permitted Uses states “The following uses may be permitted within the General Employment Area designation: i) manufacturing, processing and warehousing with accessory outside storage”, whereas Policy 23.7.2 b) states “Goods movement and logistics uses will not be permitted.” **We reiterate our request for clarification as to what is intended by “goods movement and logistics” as the two uses are not defined. We reiterate that in our submission, the General Employment Area designation should continue to permit goods movement and logistics uses;**
 - 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.” In response to our comments dated July 31, 2023, Staff stated “a “Trucking Strategy” is currently underway to further address trucking and trailer parking concerns.” **We reiterate our request**

- for clarification as to the implications for the BoltCol Lands where the Goods Movement and Logistics Land Use Strategy has not been provided for review and the associated Goods Movement District designation has not yet been determined; and**
- 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 Area 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 and Logistics Land Use 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.**