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File: P-3515

April 9, 2026

Municipal Services Office - Central Ontario (Priority Projects)
777 Bay Street, 12th Floor
Toronto, ON
M7A 2J3
Email: mmahzoningorders@ontario.ca

Attention: **Municipal Services Office - Central Ontario**
Priority Projects

Re: **Request for a Minister's Zoning Order for Employment Uses in the Town of Caledon**
ERO Number: 026-0184
Comments from Anatolia Investments Corp.
12600 Bramalea Road
Town of Caledon, Region of Peel

To Whom it may concern,

KLM Planning Partners Inc. is the land use planning consultant acting on behalf of Anatolia Investments Corp. ("**Anatolia**"), with respect to their lands at 12600 Bramalea Road and 4755 Old School Road, Caledon (the "**Subject Lands**"). The Subject Lands have an area of approximately 75.09 hectares (185.55 acres) and are legally described as Part Lots 21 and 22, Concession 4, in the Town of Caledon (the "**Town**"), in the Region of Peel (the "**Region**"). The purpose of this letter is to outline Anatolia's comments with respect to the above noted Request for a Minister's Zoning Order for Employment Uses in the Town of Caledon (the "**MZO Request**"), identified as ERO Number 026-0184, filed by QuadReal Property Group ('**QuadReal**') for their lands located at 12489 and 12861 Dixie Road.

Site Context

The Subject Lands are generally located north of Mayfield Road, south of Old School Road, east of Dixie Road, have frontage on the west side of Bramalea Road and the south side of Old School Road and are directly east of the QuadReal lands. Anatolia is also a participating landowner within the Mayfield Tullamore Landowner Group ('**LOG**'), who are owners of lands generally located south of Old School Road, west of Torbram Road, north of Mayfield Road, and west of Bramalea Road (the '**Mayfield Tullamore Lands**').

The LOG filed an application for Official Plan Amendment to facilitate a Secondary Plan on August 30, 2024 (Municipal File No. POPA 2024-0006) which is currently under review. The proposed Official Plan Amendment will establish a comprehensive planning framework for the LOG in order to create a

complete community by providing a range of housing options, complemented by commercial, institutional and recreational opportunities through the provision of schools, parks, trails and stormwater management infrastructure.

The Subject Lands are designated for residential uses by the Region and Town Official Plans. The QuadReal Lands are located outside of the Mayfield Tullamore Lands, are located immediately west of the Subject Lands and are designated for employment uses by the Region and Town official plans.

Comments from Anatolia Investments Corp.

Permitted Uses and Height/Acoustical Concerns

It is our understanding that QuadReal has filed the MZO Request to facilitate an industrial development which includes multiple warehouse buildings, vehicle and truck trailer parking, stormwater management infrastructure, and further delineation of the existing natural heritage system to optimize the developable area of the property. It is our understanding that the land use permissions sought through the MZO Request are consistent with what QuadReal have requested as part of active applications for Official Plan Amendment and Zoning By-law Amendment with the Town under Town files POPA 2024 0011 and RZ 2024 0034 (the "**QuadReal OPA and ZBA**"), save for a slight refinement to the area to which the request applies. Specifically, QuadReal is proposing to establish zoning permissions to facilitate dry storage and cold storage uses, as well as a maximum building height of 30 metres for a Dry Storage Warehouse and 45 meters for a Cold Storage Warehouse with a refrigeration tower.

We note that Cold Storage is not a permitted use in the "Prestige Industrial" (MP) Zone in Town Zoning By-law 2006-50. We also note that the infrastructure and mechanical equipment, generally located on the rooftop to support Cold Storage uses, typically emits loud and continuous noises which can result in challenging mitigation measures if not appropriately addressed at the source.

Jade Acoustics Inc. have prepared a Preliminary Environmental Noise Impact Review (the "**PENR**") of the proposed QuadReal development on behalf of Anatolia, dated April 9, 2026, which is included as Attachment 1 to this letter for reference. The PENR notes that the Ministry of the Environment, Conservation and Parks ("MECP") Class 1 sound level limits will not be met at the proposed sensitive receptors on the Subject Lands without significant mitigation measures or land use modifications (to eliminate proposed noise sensitive receptors). The PENR also notes that if the MZO Request is granted, these significant mitigation measures will need to occur solely within the Subject Lands, as no mitigation measure to address the potential noise sensitive receptors associated with Subject Lands were identified in the noise report submitted in connection with the QuadReal OPA and ZBA.

The PENR identifies four conceptual mitigation options to address the potential impact of noise sources associated with the QuadReal lands on the noise sensitive receptors proposed at the Subject Lands. From our perspective, none of the identified options are feasible for the following reasons:

1. Increased Separation Distance Between the Sources and Sensitive Receptors
    a. Increasing the separation distance on the Subject Lands by 300 m would significantly reduce the amount of residential land available for development on the Subject Lands. The Region and the Town identified the Subject Lands as suitable and necessary for residential growth to address population growth and housing supply in the Region and Town to 2051, through an extensive Land Needs Assessment and growth management

exercise. Reducing the area available for residential growth is not appropriate and could result in the Town and Region not achieving growth targets.

2. Special Dwelling Design Considerations and Acoustical Barriers
    a. Special dwelling units as described in the PENR combined with an approximate 1 km acoustic wall at a height of 8 m are impractical and cost prohibitive. We anticipate the Municipality would have concerns in proposing this type of mitigation from an urban design and maintenance perspective, in addition to concerns related to the dwelling unit details as described in the PENR, which in our opinion are atypical relative to other products available in the market and which could otherwise be avoided.

3. An Acoustical Barrier
    a. The acoustical barrier described in the PENR, with a length of approximately 1.2 km at a height of 14 m, is unreasonable, impractical and cost prohibitive and would affect the amount of land available for residential development, as we anticipate the acoustic barrier would need to consist of a combination of a wall and berm.

4. The Installation of Intervening Uses
    a. This option is in our opinion not feasible or supportable. Intervening land uses (light commercial or industrial) are not permitted in the Town Official Plan nor contemplated in the LOG OPA for the Subject Lands and have been proposed along existing collector and arterial roads providing good access and visibility, together with requirements for development of a mix of uses in accordance with good planning principles. Establishing intervening land uses along the common property line would again reduce the area available for residential growth and in our opinion is not good planning.

Pursuant to the PENR, the proposed industrial land uses with the current proposed design significantly impacts the feasibility of the proposed and planned-for residential development on the Subject Lands and does not represent good land use planning with respect to acoustics. This is neither feasible or desirable and would preclude a significant amount of land designated for residential uses to be developed for their planned residential function.

To ensure an appropriate transition is achieved, it is our opinion that cold storage uses should not be permitted. Further, to ensure an appropriate transition between the employment lands and the future residential lands, it is our opinion loading areas and trailer storage should be prohibited along the eastern property line.

In summary, Anatolia provide the following comments:

1. Prohibit Cold Storage / temperature-controlled warehouses as a permitted use. Due to the proximity of planned residential lands, and based on the applicable noise mitigation requirements, it is our opinion that this is not an appropriate area for a Cold Storage Use;
2. Limit the maximum height of the proposed industrial buildings to 18 metres, as permitted in the Town's Prestige Industrial ('MP') Zone; and,
3. Prohibit Trailer Parking and Loading Areas along the common property line between the QuadReal lands and the Subject Lands.

Anatolia is not opposed to the development of employment uses on the QuadReal lands in general. Anatolia's concerns relate to the specific issues noted above that if not addressed properly, will have significant adverse impacts on the viability to develop the Subject Lands for their intended and planned residential use.

We trust that the above materials are in order. Should you have any questions with respect to the enclosed, please do not hesitate to contact the undersigned.

Yours truly,
KLM PLANNING PARTNERS INC.

Ryan Virtanen BES, MCIP, RPP
Partner

Tim Schilling BES, MCIP, RPP
Associate

cc. Josh Berry, Anatolia Investments Corp.

Attachments:
1. Preliminary Environmental Noise Impact Report and air photo of Subject Lands, prepared by Jade Acoustics dated April 9, 2026.

Jade Acoustics Inc. | Consulting Engineers | 411 Confederation Parkway, Unit 19, Concord, Ontario, L4K 0A8 | Tel: (905) 660-2444 | Fax: (905) 660-4110

April 9, 2026

Anatolia Investment Corporation
8300 Huntington Road
Vaughan, Ontario
L4H 4Z6

VIA E-MAIL

Attention: Josh Berry
Josh.Berry@anatolia.com

Re: Preliminary Environmental Noise Impact Review
Proposed Mixed-Use Residential Development
Banty's Roost Golf Course Re-Development (Anatolia)
Town of Caledon
Our File: 22-099-03

Jade Acoustics Inc. has been retained by the proponent of the proposed mixed-use residential development (Banty's Roost Golf Course Redevelopment) at 12600 Bramalea Road (hereinafter referred to as 'Anatolia'). This preliminary environmental noise impact review has been prepared to assess the potential noise impact of future industrial developments (hereinafter referred to as 'QuadReal') on the proposed mixed-use residential development by Anatolia and the feasibility of the mitigation measures required. Figure 1 shows the location of the subject site and the future industrial developments.

The preliminary review conducted was based on the following:

- Conceptual Draft Plan of Subdivision dated February 18, 2025, prepared for the Anatolia development, received by Jade Acoustics Inc. on February 26, 2025;
- Submission materials for Town File – POPA 2024-0006 – Mayfield Tullamore Secondary Plan, available on the Town of Caledon's website;
- 2nd Submission materials for Town File – RZ 2024-0034 and POPA 2024-0011 – 12489 and 12861 Dixie Road, available on the Town of Caledon's website;
- Architectural Plan drawings for the QuadReal development dated July 23 ,2025, prepared by Ware Walcomb, 2nd submission materials for Town File – RZ 2024-0034 and POPA 2024-0011 applications submitted by QuadReal Property Group, available on the Town of Caledon's website; and
- 12489 and 12861 Dixie Road - Environmental Noise and Vibration Study dated July 28, 2025, prepared by SLR Consulting Ltd. for QuadReal Property Group, 2nd submission materials for Town File – RZ 2024-0034 and POPA 2024-0011, available on the Town of Caledon's website.

The information contained in the above referenced noise and vibration study prepared for the future industrial developments was used in the analysis. The noise and vibration study indicated that the industrial buildings could have dry storage and cold storage. The noise sources associated with the dry storage scenario include numerous idling trucks, moving trucks, office HVAC units, and rooftop HVAC units on all industrial buildings. For the cold storage scenario, the noise sources include numerous refrigeration trailers, exhaust fans on the enclosed loading dock areas and cooling towers, in addition to all noise sources in the dry storage scenario. For impulsive noise, two (2) coupling/uncoupling events and twenty (20) forklift impulses per loading bay associated with loading and unloading trailers were included.

JADE ACOUSTICS

According to the referenced noise and vibration study, cold storage can take place at 12861 Dixie Road Building 1, 12861 Dixie Road Building 2, and/or 12489 Dixie Road, Building 2 only with full enclosures at the loading areas to allow for the refrigerated trailers to be located indoors. If cold storage is to take place in Buildings 1 and 3 at 12489 Dixie Road, a 4.5 m (14.8 ft) high and 410 m (1345 ft) long noise barrier is required for Building 3, while no mitigation is needed for Building 1. These mitigation measures were accounted for in the analysis for the cold storage scenario. Both dry storage and cold storage scenarios were analyzed for continuous noise, while impulsive noise was assessed separately, in accordance with the Ministry of the Environment, Conservation and Parks (MECP) NPC-300 noise guidelines.

Other recommended mitigation measures to address the existing residential receptors in the area due to dry storage activities noted in the SLR noise report have been included in the acoustic model.

Note for completeness, the referenced noise and vibration study did not propose any noise mitigation measure to address the potential noise sensitive receptors associated with Anatolia lands.

The CadnaA computer program Version 2025 which uses International Standard Analytical Code ISO 9613-2 (1996) was used for the analysis. The noise model has been prepared based on the best available information, modelling techniques presented in the referenced noise report by SLR and assumptions based on typical industry practice.

Based on the preliminary analysis, the MECP Class 1 sound level limits will not be met at the proposed sensitive receptors in the Anatolia development without significant mitigation measures or land use modifications (to eliminate proposed noise sensitive receptors).

As noted in NPC-300, "*where practicable, the preferred mitigation option is a reduction of noise emissions at the stationary source by modifying the design or the operation of the source, or by implementing noise control measures directly at the source. A cooperative effort on the part of the proponent and the stationary source owner is desirable*."

It is our understanding that a co-operative effort between QuadReal and the neighboring landowners is not being undertaken at this time with the request for a Minister's Zoning Order (MZO) for their subject lands. If this proposed MZO is granted, mitigation measures required to address the proposed stationary noise source operations at the QuadReal Lands will need to occur solely within the Anatolia Lands.

The conceptual mitigation options to address the potential impact of sources associated with the QuadReal lands on the noise sensitive receptors proposed at the Anatolia Lands would include but not be limited to:

1. **Increased Separation Distance Between The Sources and Sensitive Receptors**

   This could include the development of a buffer block with no residential uses. This buffer block would need to be a minimum 300 m (984 ft) and would still not achieve sound level limit compliance without additional significant physical mitigation measures. With the current proposal on the QuadReal lands, the entire required separation distance would need to be accommodated within the Anatolia Lands, resulting in the loss of a significant portion of the proposed residential development.

2. **Special Dwelling Design Considerations and Acoustical Barriers**

   A minimum 8 m (26 ft) high and approximately 1 km (3280 ft) long noise wall would need to be installed immediately adjacent to special dwelling designed buildings. These special dwelling designs could include bungalows with loft designs and windows only oriented in an easterly direction. Loft windows associated with the non-habitable spaces (hallways, bathrooms, closets) would be acceptable for the west, north and south sides of these dwellings. Approximately 50% of the proposed dwellings will need to have these special dwelling designs. These mitigation measures may not be sufficient to completely address the future industrial buildings but are expected to assist in achieving compliance in conjunction with other local barriers. Based on the current new housing market, our client has indicated that the construction of this type of dwelling unit would be infeasible and may not be approved by the municipality.

3. **An Acoustical Barrier**

   An acoustical barrier of a minimum 14 m (46 ft) in height along the common property line (over 1.2 Km (3927 ft) in length) between the QuadReal Land and the Anatolia lands would be required to mitigate the proposed noise sources. This height of acoustical barrier has construction and maintenance limitations with the topography on the Anatolia Lands and the requirements for the long-term maintenance of this barrier by the municipality or a private condominium corporation.

4. **The Installation of Intervening Uses**

   The construction of intervening non-residential dwellings (light commercial or industrial) between the QuadReal Land and the proposed sensitive uses on the Anatolia Lands could be undertaken. This approach, including the required building configurations and heights necessary to provide sufficient acoustical barrier effect to mitigate the noise sources on the QuadReal Lands have been reviewed and considered to not be practical, feasible or desirable by the proponent.

While conceptually it may be feasible to implement any of the above mitigation measures, experience on comparable projects has indicated that many of these mitigation options have limitations (beyond those noted above) and are not expected to be desirable to the municipality or our client.

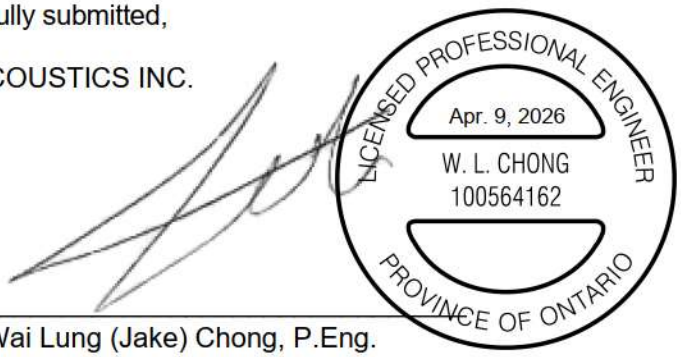
The development of the types of noise sources proposed by QuadReal immediately adjacent to proposed sensitive uses on the Anatolia lands does not represent good land use planning with respect to acoustics. Consideration of the "D-1 Land Use Compatibility" and "D-6 Compatibility between Industrial Facilities" documents by the MECP is recommended to address land use compatibility with respect to acoustics and other emissions.

Based on the above-mentioned mitigation measures and many iterations of the mitigation measure modelling review, the current proposed design of the industrial developments on the QuadReal Lands significantly impacts the feasibility of the proposed development by Anatolia. If source-based mitigation measures are impractical or not desirable by QuadReal, the mitigation at the receivers would be even more substantial, which is not feasible or desirable by our client. Therefore, modifying the design and/or operation of the noise sources at the QuadReal Site is recommended. The implementation of other ultimate land uses or different building configurations on the QuadReal Lands would limit the overall acoustical mitigation measures required by all parties and represent better land use planning (with respect to acoustics).

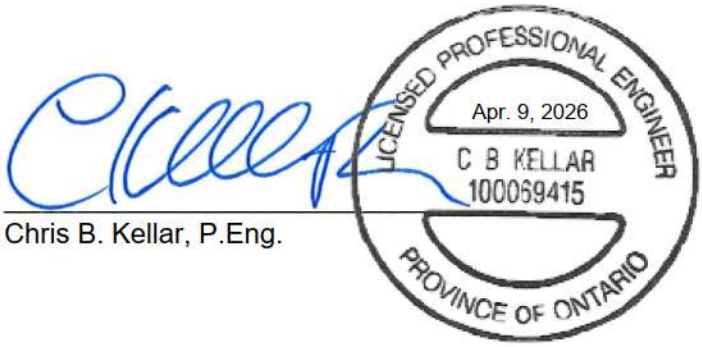
In summary, as recommended in NPC-300, cooperation between the industrial and residential proponents is encouraged. Land use compatibility (with respect to acoustics) can be achieved through collaboration among the parties involved. This collaboration would not be possible or considered should a Minister's Zoning Order be granted for the QuadReal Lands.

Respectfully submitted,

JADE ACOUSTICS INC.

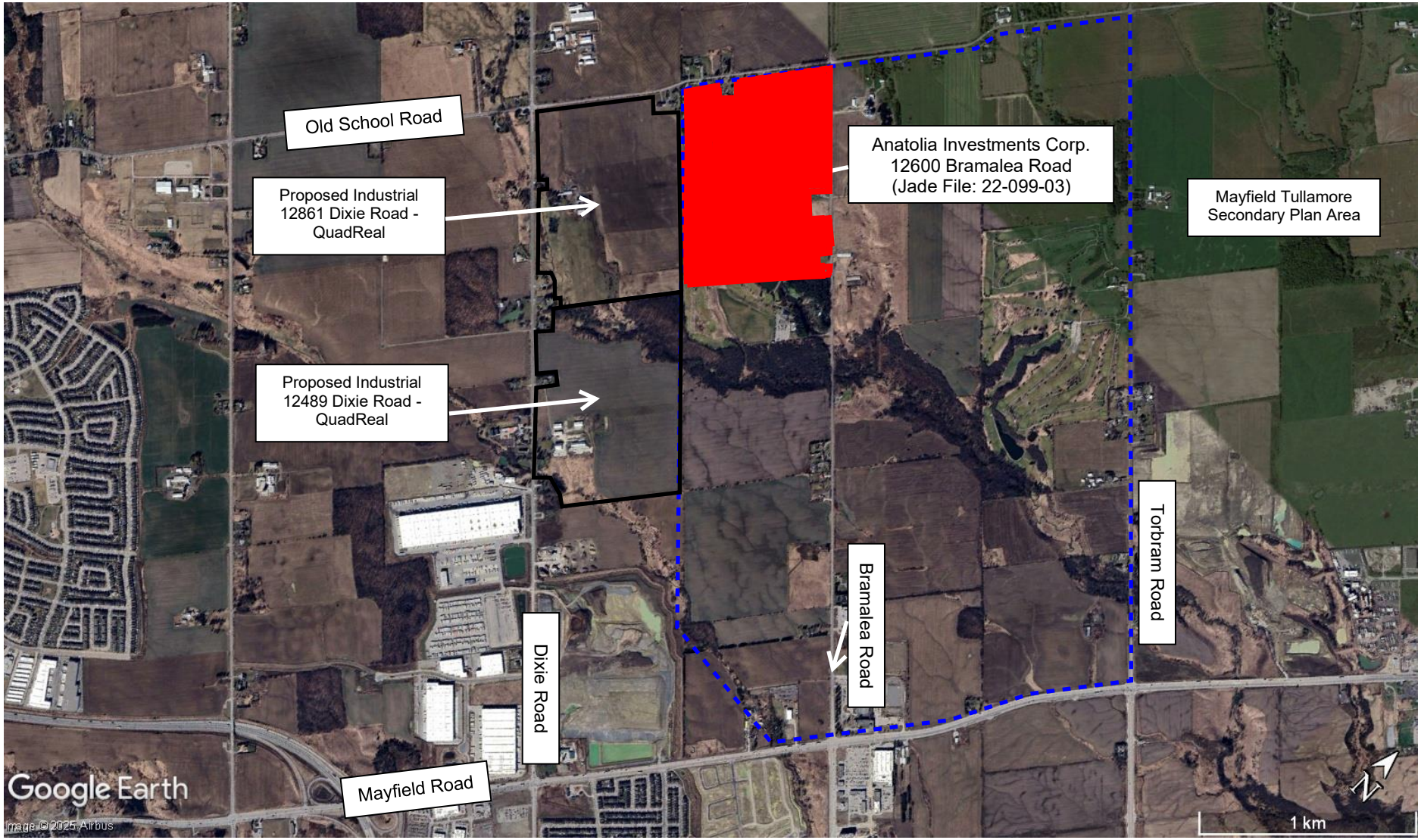


Per: _____
Wai Lung (Jake) Chong, P.Eng.



Per: _____
Chris B. Kellar, P.Eng.

JC/DS/CK/jg
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N.T.S

Proposed Mixed-Use Residential Development
Banty's Roost Golf Course Re-Development (Anatolia)
Town of Caledon

Date: April 2026 **File: 22-099-03**

KEY PLAN

FIGURE 1

JADE ACOUSTICS