April 14, 2026

Municipal Services Office – Central Ontario
Priority Projects
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RE: Request for MZO for Employment Uses in the Town of Caledon – ERO Number 026-0184

Executive Summary:

- The Town of Caledon acknowledges the Province's authority to issue a Minister's Zoning Order (MZO) but does not support the requested MZO for 12469 and 12861 Dixie Road.
- The Town is committed to meeting its provincial pledge of 125,000 new jobs by 2051.
- The lands are subject to active planning applications (Official Plan Amendment, Zoning By-law Amendment, and Site Plans), currently under detailed municipal and agency review.
- Significant technical issues remain unresolved, including transportation, servicing, environmental impacts, land use compatibility and infrastructure planning.
- While the Town recognizes that these lands are important to achieving the employment targets, the development of these lands must be carried out in a manner that serves a function in supporting the overall transportation network, provides for essential public infrastructure to support the development of the lands, protects and enhances the natural features, is efficient for the use of the lands and compatible with the surrounding land uses/development.
- The proposal undermines comprehensive planning and risks uncoordinated development.
- Secondary Planning is required and the request for the MZO leaves uncertainty with the coordinated framework approach to guide development in the area.
- The lands are not presently serviced or development ready. The municipal process can meet development timelines without an MZO.
- The proposed MZO excludes the Town's planned east-west road identified as a major collector with a 26 metre right-of-way in the Town's Official Plan and Multi-Modal Transportation Plan, despite prior commitments from the landowner to work with staff to incorporate this connection.
- The Town demonstrated ongoing commitment to work with the applicant to develop and refine a road alignment that preserves the orderly development of these lands while not compromising their economic viability and still meeting the Town's transportation objectives.
- The proposed removal of Site Plan Control is strongly opposed.
- The proposed zoning standards are not fully assessed and must be comprehensively reviewed.
- Natural heritage features, watercourses and hazards are not fully evaluated and must be considered in the evaluation of the proposed zoning standards.
- Stormwater management and servicing strategies remain incomplete. There is a risk to watershed function, floodplains and ecological system.
- Two designated heritage properties require clear protection and appropriate adaptive reuse, not fully addressed in the requested MZO.
- The municipal planning process should continue to ensure coordinated, sustainable, and well-planned development.

To the Ministry of Municipal Affairs and Housing,

On behalf of the Town of Caledon, we are writing to provide comments in response to the request submitted by Matthews Canada on behalf of QuadReal Property Group for a Minister's Zoning Order (MZO) (ERO-026-0184) affecting the lands located at 12469 and 12861 Dixie Road in the Town of Caledon. Town of Caledon Planning staff acknowledge the Province's authority to implement an MZO, however, we are providing comments for your consideration.

The lands are subject to active Official Plan Amendment, Zoning By-law Amendment and Site Plan applications (Town Files POPA 2024-0011, RZ 2024-0034, SPA 2025-0016 and SPA 2025-0017, respectively) to facilitate a proposed industrial development. The Official Plan Amendment and Zoning By-law Amendment Applications were submitted in December 2024 and deemed complete January 24, 2025. Town staff, as well as external agencies have been working diligently with the proponents through the development application review process.

Despite the Town's ongoing and diligent involvement with the proponent and their consultants, the Town was neither consulted nor informed of the requested MZO before it was posted on the Environmental Registry of Ontario (ERO).

Through the development application review process, the Town has identified a number of outstanding technical comments and concerns that have yet to be addressed. Key technical matters, critical to ensuring the orderly and comprehensive development of the lands, remain unresolved. Later sections of this letter highlight the most significant outstanding technical comments forming a basis for the Town's concerns and opposition to the requested MZO.

Town of Caledon 1978 Official Plan and Future Caledon Official Plan

The subject Official Plan and Zoning By-law Amendment applications were submitted to the Town before the Future Caledon Official Plan came into force and effect, however several key considerations still apply. Urban uses on the subject lands cannot be evaluated in isolation, rather the Town must comprehensively plan the new urban area with particular consideration to the multimodal transportation infrastructure needed to support it. As the 1978 Official Plan never contemplated urban development between the areas of Mayfield West and Bolton, it does not provide an appropriate policy framework for assessing these proposals. The subject applications (QuadReal) sought to implement urban and employment designations ahead of the adoption and approval of Future Caledon essentially seeking to advance development of the lands without the benefit of the new Official Plan's broader context, including its secondary planning framework and conceptual collector road network. When Town Council adopted the Future Caledon Official Plan on March 26, 2024 (prior to the submission of the subject development applications), all applications were expected to have regard for its policies, particularly the contemplated collector road network intended to support the new urban area and its Employment Areas. The Future Caledon Official Plan includes policies that envision a Caledon-wide multimodal transportation system, with ongoing updates informed by transportation studies, master plans, and future amendments. These policies emphasize the Town's commitment to monitoring and updating the Multimodal Transportation Master Plan (MMTMP), supporting the development of multimodal and active transportation plans, and ensuring that secondary plans address the efficient provision of sustainable transportation, transit infrastructure, and higher-order east-west transit and goods movement corridors.

Secondary Plan

In accordance with Future Caledon Official Plan, secondary planning is required for development within the new urban area. The Official Plan Amendment application (Town file POPA 2024-0011), filed by the proponent in December 2024, seeks to establish Secondary Plan policies to guide the comprehensive development of the area and supporting transportation infrastructure. Notably, the Official Plan Amendment application extends beyond the limits of the proposed MZO lands, creating uncertainty regarding the future planning and development of the remaining lands (see attached) should the MZO be approved. Staff are concerned that the MZO would negate the need for the Secondary Plan which is a key planning instrument for the comprehensive development of the lands. In this regard, should the Ministry consider the MZO, it is requested that the need for Secondary Plan approval for the entire area be considered and incorporated into any approvals.

Phasing of Development

From a phasing perspective, the northern portion of the lands (12861 Dixie Road) are designated within Phase 2 (2036 - 2051) Employment Areas under Schedule B5 – Growth Phasing of Official Plan Amendment 7 (OPA 7), approved by Council in November 2025. The proponent has appealed OPA 7 to the Ontario Land Tribunal (OLT), seeking to advance the lands to Phase 1 (2026 - 2036). Regional servicing infrastructure, including water, wastewater, and the urbanization of Dixie Road, is not anticipated to be completed until early 2027. The Town is of the opinion that the review of the development applications can proceed through the standard municipal review process in a timely manner to meet the projected timeframes. The Town was always committed to working with the proponent to advance the development of these lands in accordance with the Regional servicing timing.

Transportation

The proposed MZO excludes the planned east-west road, identified as a major collector with a 26 metre right-of-way, despite prior commitments from the landowner to work with staff to incorporate this connection. The Future Caledon Official Plan and the Council approved Multi-Modal Transportation Master Plan (MMTMP) Addendum identify this road as a critical component of the transportation network. Since June 2025, staff have worked collaboratively with the landowner, who has confirmed in writing (February 9 and March 26, 2026) their willingness to refine and include the road through the planning process (refer to Attachments 2 and 3).

Excluding the road from the requested MZO has the following implications:

- undermines the coordinated planning approach established through the Future Caledon Official Plan and MMTMP Addendum;
- jeopardizes delivery of the preferred alignment and may shift the corridor into Greenbelt lands, introducing environmental impacts and feasibility risks;
- shifts the financial burden to the Town, requiring public funding for land acquisition and construction of infrastructure that would otherwise be delivered by the landowner through the development process; and,
- does not support a coordinated planning approach. Without the east-west collector road network, each development within the MZO lands would rely on direct private access to Dixie Road. This will lead to closely spaced driveways and potential operational and safety impacts along this heavily travelled arterial road, whereas access to the proposed developments was intended to be accessed via the east-west collector road.
- Remove a critical east-west connection to the future Bramalea Road highway interchange with Highway 413, forcing significant traffic detours, overloading already constrained corridors.

Town staff have been committed to working with the applicant to establish a critical road network through the area and subject lands. Attachment 4 illustrates how the Town refined the planned road network for 12489 and 12861 Dixie Road to better balance growth, connectivity, and development feasibility. The original plan (shown in blue in the attachment) included a highly connected grid but significantly impacted the developability of the subject lands. Through the MMTMP Addendum process, further study and collaboration with the proponent and with area landowners, the Town revised the network, resulting in a refined east-west collector road (shown in pink in the attachment) that reduces impacts on development while maintaining key connectivity, and provides essential linkage to the future Bramalea Road and Highway 413 interchange. Removing this road through the MZO would disrupt coordinated planning and negatively affect the efficient development of surrounding lands.

By improving connectivity and facilitating efficient goods movement, the east-west collector road will play a key role in supporting the long-term economic viability and competitiveness of the Town's Employment lands.

Given the above listed concerns, the Town strongly recommends that, should the Ministry proceed with the MZO, the MZO be revised to protect and incorporate the planned east-west major collector road alignment.

An additional transportation and development engineering concern relates to the proposed truck access to Old School Road for the lands municipally known as 12861 Dixie Road. Old School Road is presently designated as a no-trucking route and is not designated for long term heavy truck traffic. The Town will require further geotechnical investigation to assess the pavement structure and provide recommendations to support the truck traffic on Old School Road.

Importance of Maintaining Site Plan Control

The Town also notes that the MZO request seeks an exemption from Site Plan Control for the development of the subject lands, and we strongly oppose its removal. Site Plan Control is a critical planning tool that enables the Town to conduct a comprehensive, multidisciplinary technical review of development proposals, ensuring that sites function safely, efficiently, and compatibly within their surrounding context. It provides the mechanism through which municipalities implement provincial and municipal planning objectives in collaboration with applicants and stakeholders. Through Site Plan Control, the Town is able to assess and secure safe pedestrian and vehicular circulation, compliance with accessibility standards, defined pathways and crossings, adequate lighting and signage, clear sightlines, safe parking and loading areas, and appropriate emergency access and site ingress/egress. It also ensures compatibility with adjacent land uses by evaluating building orientation, incorporating landscaping and screening, implementing noise attenuation, and establishing buffers to protect sensitive environmental features. From an infrastructure perspective, Site Plan Control coordinates grading, servicing, stormwater management, and low-impact design measures. Site Plan Agreements further ensure that development proceeds in accordance with approved plans, provide mechanisms to address non-compliance through securities, and allow the Town to secure necessary road widenings and easements to support public infrastructure. Removing Site Plan Control would eliminate these essential safeguards and undermine the Town's ability to ensure well-planned, safe, and context-sensitive development.

Proposed Uses and Zone Standards

The request for an MZO seeks to permit an expansive range of uses such as storage, warehousing, offices, data centres, industrial uses, manufacturing, transportation and trucking uses, motor vehicle related services, factory outlets, financing institutions, restaurants, and retail uses. It also proposes

detailed zoning requirements such as maximum building heights, building area, and setbacks intended to facilitate a specific development concept. The proposed uses and zoning provisions have not been fully assessed by Town staff for appropriateness and feasibility.

Staff have provided comments and expressed concerns with the proposed zoning provisions, however, it is unclear whether these have been addressed as part of the proponent's submission to the Ministry. Based on a cursory review of the draft Zoning By-law submitted in support of the requested MZO, a number of provisions have changed from the submission that was originally received by the Town as part of the development application review. A fulsome review of the requested MZO By-law has not been conducted at this time. One key concern is with respect to the compatibility and land use interface with the adjacent community/residential uses proposed for the abutting lands to the east (Mayfield Tullamore Secondary Plan). Comments and concerns were raised by the public, the Mayfield Tullamore landowners group to the east, and Town staff concerning the noise impacts of future employment uses would have on the future residential uses. Other matters, including required clarification on development standards, definitions and land use permissions were also raised through the review and have not been adequately addressed.

Town staff are committed to working with the proponent to address the comments and concerns raised through the application review process.

Noise

The Noise Study submitted as part of the development applications does not reflect the road network or consider the future residential development of the lands to the east (Mayfield Tullamore Secondary Plan Area). As previously noted, concerns were raised with respect to the impacts of the development to the neighbouring planned residential communities which must be considered in determining appropriate setbacks.

Natural Heritage and Water Resources

Although the requested MZO excludes Greenbelt-designated lands, the area still contains natural heritage features and systems that extend beyond Greenbelt boundaries, and these features have not yet been fully evaluated or approved. The proponent has submitted a Comprehensive Environmental Impact Study and Management Plan (CEISMP), but it remains under review, and development limits are unconfirmed.

Current information indicates that the requested MZO area includes valleylands and regulated natural hazards (floodplains, slopes) under the jurisdiction of the Toronto and Region Conservation Authority (TRCA) areas that should be protected from development. The CEISMP also fails to provide appropriate management for the removal or alteration of headwater drainage features (HDFs), which could significantly affect development limits and zoning. Town staff have concerns with the inadequate water balance requirements and the establishment of self-sustaining natural vegetation within the Greenbelt Natural Heritage System in the CEISMP.

Town Water Resource staff identify four critical elements to protect watershed function and avoid future conflicts with development:

1. Protection of valleylands containing natural hazards.
2. Retention and function-based realignment of HDFs along Dixie Road and Old School Road
3. Identification and dedication of all public stormwater management facilities.
4. Recognition, evaluation, and proper zoning of the regulated watercourse corridor, which is not fully captured in the current MZO boundary.

The lands contain a watercourse corridor that conveys flows, influences flood elevations, governs erosion and channel stability, and supports ecological connectivity. The current MZO framework does not account for the full extent of this corridor, creating risks such as floodplain and erosion hazards, conflicts between development and natural system constraints, and potential delays or redesigns during later approvals.

Finally, all stormwater management facilities required to service public lands must be identified early and carried through the planning and design process. These facilities must be appropriately sized and configured to meet water quality, quantity, erosion, and water balance objectives.

Functional Servicing and Stormwater Management

The stormwater management strategy is to align with and be informed by the recommendations of the Local Subwatershed Study or equivalent study. At present, the Functional Servicing Report does not reflect the required east-west collector road network and must be revised to identify compliance with the Town's Consolidated Linear Infrastructure Environmental Compliance Approval (CLIECA) performance criteria. Additionally, as previously noted, the municipal right of ways are required to be serviced by public stormwater management facilities which do not appear to be contemplated in the proposed MZO.

Cultural Heritage

The subject lands contain two significant cultural heritage resources (two farm houses) for which Notices of Intention to Designate have been issued under Part IV of the *Ontario Heritage Act,* being located at 12861 Dixie Road (Burn Brae) and 12489 Dixie Road (William Speirs House). To ensure their long-term conservation, the cultural heritage resources must be provided with a range of appropriate uses. For the Burn Brae house specifically, accessory office/office use is encouraged and has been discussed with the applicant; however, it does not appear to have been captured in the MZO request. The MZO request does not specify which uses apply to the heritage buildings.

Further, it is unclear from the Location Map whether the heritage building located at 12489 Dixie Road (William Speirs House) is within the subject lands or removed from the MZO given its proximity to the Greenbelt. The future use(s) should be determined in consultation with the Town in advance of any approval.

The Town has been awaiting the submission of R Plans to finalize the designation by-laws for both cultural heritage resources. The Town acknowledges the applicant has thus far worked with staff to achieve the conservation of these resources and staff encourage the continued collaborative and transparent approach to ensure these resources are protected.

Conclusion

While staff recognize the potential benefits of facilitating development through provincial tools, we recommend that further technical analysis and consultation be undertaken to ensure that the proposal aligns with sound planning principles, infrastructure capacity, and community interests. Accordingly, the Town strongly recommends refusal of the requested MZO and respectfully requests that the Ministry allow the established municipal planning processes to proceed with consideration of the outstanding issues identified. Town staff remain committed to working collaboratively with the proponents, provincial partners, and the community to support employment growth in a responsible, sustainable, coordinated, and transparent manner.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned. Town staff are available to meet with Ministry staff to discuss the matters and collaborate on next steps.

Sincerely,

Eric Lucic

Eric Lucic, MCIP, RPP
Commissioner of Planning & Development and Chief Planner
Town of Caledon

TOWN OF CALEDON

Attachment 1 – Lands Subject to Official Plan Amendment
Attachment 2 – Letter from Applicant dated February 9, 2026
Attachment 3 – Letter from Applicant dated March 26, 2026
Attachment 4 - 12489 and 12861 Dixie Road with Planned Collector Alignments