

December 20, 2023

GSAI File: 870-001

Region of Peel
Planning and Development Services
10 Peel Centre Drive, Suite A
Brampton, ON
L6T 4B9

Attention: Patrick Amaral MES(Pl)
Principal Planner

**Re: Affordable Housing for the Caledon Station Secondary Plan Area
Town of Caledon Official Plan Amendment POPA 2021-0002
Without Prejudice (OLT-23-000303)
Region File Number: OZ-21-002C
North of King Street, in Between The Gore Road and CPR
Town of Caledon, Region of Peel**

As you are aware, we are the planning consultants to Caledon Community Partners (the “Owner”). The Owner is a landowner group that owns/controls the lands located north of King Street, west of the CPR Rail Corridor and east of The Gore Road, in the Town of Caledon (the ‘Subject Lands’).

On behalf of the Owner, we wish to provide a detailed response to the Region of Peel that focuses on the Region’s Official Plan policies related to the provision of affordable housing. This letter has been prepared in response to the Region’s comment letter of November 7, 2023 and the discussion that took place between Regional staff, Town staff and the CCP Consultant Team on November 14th, 2023.

Policy Directives Related to Affordable Housing:

The importance of providing for adequate affordable housing within the Caledon Station Secondary Plan is acknowledged by the Region, the Town and CCP. There are a number of policy directives contained in the Region of Peel Official Plan (2022) that speak to the provision of affordable housing, including the following:

“5.6.19.18 Until such time as the local municipality has established Major Transit Station Area policies in accordance with Section 16(16) of the Planning Act and Policy 5.6.19.9, proposed developments within a Major Transit Station Area identified on Schedule E-5 shall be reviewed with consideration to the objectives of this Plan to ensure the proposed development:

.....

c) Addresses Regional and local municipal housing policies to provide a range and mix of housing options and densities, including affordable housing;”

.....

5.6.20.7 *To ensure development in the Designated Greenfield Area supports a range and mix of housing options and densities, including additional residential units and affordable housing, to serve all sizes, incomes, and ages of households.*

5.6.20.14.22.1 Housing Assessment

e) Prior to the Town of Caledon adopting an official plan amendment and the secondary plan to implement the settlement area boundary, the Town of Caledon will prepare a housing assessment in consultation with the Region in order to include policies for the provision of affordable housing. The housing assessment shall address:

i) Contribution towards the achievement of Regional new housing unit targets;

ii) The availability of an appropriate range and mix of housing types, densities, sizes and tenure that contribute to the supply of affordable housing; and,

iii) Identification and conveyance strategy for affordable housing, in consultation with the Region.

5.9.2 *To achieve Peel-wide new housing unit targets shown in Table 4, which provide an appropriate range and mix of housing options and densities, including affordable housing, that meet local housing need so that people can live in the community of their choice.”*

Table 4 – Peel-Wide New Housing Unit Targets

Target Area	Targets
Affordability	That 30% of all new housing units are <i>affordable housing</i> , of which 50% of all <i>affordable housing</i> units are encouraged to be <i>affordable</i> to <i>low income</i> households.
Rental	That 25% of all new housing units are rental tenure.
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses.

As noted throughout the Planning Justification Report submitted on behalf of this proposal (2021; rev. Nov 2022; rev. June 2023), the vision for the Caledon Station community is for a compact, vibrant, mixed use, pedestrian-oriented, transit supportive, sustainable, complete community to be provided with a range and mixture of land uses, densities and built forms to support housing choice for current and future residents.

It is also important to examine the Town of Caledon’s Official Plan (2018) policy directives related to the provision of affordable housing. Below is an outline of some of the affordable housing policy directives from the Caledon Official Plan which have been considered in the Caledon Station Secondary Plan:

- “3.5.3.5.4 *The Town will consider establishing and implementing housing targets for affordable rental and ownership housing and for market housing based on local supply and demand.*

- 3.5.3.6.1 *The Town will endeavour to facilitate applications that would provide affordable housing for moderate and lower income households.*

- 3.5.3.6.8 *The Town shall consider reviewing its development standards with the objective of identifying and implementing appropriate opportunities to support and facilitate affordable housing.”*

One of the objectives of the Caledon Station Secondary Plan is to “*establish a range and mix of housing types, densities, sizes and tenures to ensure the provision of affordable housing, including contributing towards the achievement of Regional housing unit targets and to achieve MTSA density targets.*” (Sec. 7.16.3.2 (e). December 7, 2023 Draft Secondary Plan). There is a distinct range and mix of land uses, densities and built forms planned for and secured by the policy directives in the draft Secondary Plan.

Specifically, in the draft Secondary Plan (*latest draft dated December 7, 2023*), Section 7.16.4 outlines minimum density targets for lands within the MTSA (Table 7.16) and for lands beyond the MTSA (Table 7.17) within the Secondary Plan Area. Further, Residential policies are outlined in Section 7.16.6, with specific policies related to affordable housing contained in Section 7.16.6.2, Medium Density within Section 7.16.6.4, and Mixed Use / High Density in Section 7.16.7. As well, policies encouraging and providing permission for rental units and seniors housing throughout the Plan Area are included in Sec 7.16.6.2.3 and 7.16.6.2.4 of the draft Secondary Plan. Some of these draft policy directives are outlined below for your ease of reference:

“DRAFT Caledon Station Secondary Plan excerpt (December 7, 2023 version):

7.16.6.2 *Affordable Housing*

- 7.16.6.2.1 *Lands in the Plan Area will assist the Town in achieving the Peel-wide new housing unit targets to meet the diverse housing needs of the Town, including the needs of different income groups, people with additional needs and accessibility requirements and the needs of people through all stages of their lives.*
- 7.16.6.2.2 *Gentle density housing including additional residential units (ARU) will be permitted in the Low density and Medium Density land use designations.*
- 7.16.6.2.3 *Purpose-built rental housing will be permitted in all residential areas.*
- 7.16.6.2.4 *Housing for seniors, including apartment units, retirement homes and long term care homes will be permitted in the Medium Density and Mixed-Use / High Density land use designations.*
- 7.16.6.2.5 *Landowners in the Plan Area shall provide land for affordable housing in the Plan Area of approximately ____ **ha** (____ **ac**) of land to be provided to the Region of Peel in fulfilment of Section 5.6.20.14.22 (e) and Table 4 (Peel-Wide New Housing Targets) in the Region of Peel Official Plan (Nov 2022), and in fulfilment of Section 3.5.3.6.1 in the Town of Caledon Official Plan (2018) regarding the provision of affordable housing.*
- 7.16.6.2.6 *The location, size, configuration, and frontage onto adjacent roads of these lands shall be decided through subsequent planning processes and shall be on lands within the MTSA limits.*
- 7.16.6.2.7 *These lands shall be fully serviced and gratuitously conveyed, free and clear of encumbrances to the Region of Peel. Said conveyances shall occur at the time of registration of the plan of subdivision in which the lands are located.”*

These draft policy directives have been included within the Caledon Station Secondary Plan and may continue to be finessed through working sessions with Caledon and Peel staff, thus ensuring that the Region and Town affordable housing policy directives are met.

As well, as noted in our letter to the Town on November 24, 2023 outlining how the Caledon Station Secondary Plan conforms to the Region of Peel Official Plan, a Housing Assessment was prepared in support of the entire Caledon Station Secondary Plan (GSAI, November 2022, revised June 2023) which summarizes that the Caledon Station Secondary Plan promotes land use densities

and patterns that encourage affordable housing options within a complete community because of the lands' uniquely close proximity to the future GO station and the mobility hub nucleus that will ultimately evolve. In this regard, a mix of uses will be provided, including many different types of residential built forms, institutional uses, parks, and retail uses, and the Plan focuses amenities in strategic areas within walking distance to facilitate active transportation and, ultimately, support a more compact urban form and affordable housing opportunities. With such a wide range and mix of housing types and sizes being contemplated for Caledon Station, residents of various life stages and economic positions will be given the opportunity to reside within, and enjoy, Caledon Station.

Affordable Housing Proposal for Caledon Station:

The Region's comment letter of November 7, 2023 requested that CCP consider "*adding a specific secondary plan policy requiring an affordable housing contribution (land or units) to Peel for Community housing and/or provide units at prices that are affordable to low or moderate-income households*" and "*the applicant may consider a contribution of land or units to Peel and/or a non-profit housing provider to be used for affordable housing.*" This comment was further discussed during our meeting with Regional and Town staff on November 14th, 2023. Providing land contribution to facilitate the development of units for affordable housing by the Region or a non-profit housing provider is not currently prescribed in policy and is a unique approach to the provision of affordable housing in Peel, which is worthy of consideration.

CCP has given consideration to this request and is agreeable to committing to a base obligation through the Secondary Plan policy directives, and the details of which will be formally proposed and discussed (in terms of specific location and size) through subsequent planning process(es). In this regard, as already noted, the above draft policies (7.16.6.2.5, 7.16.6.2.6, and 7.16.6.2.7) have been included in the December 2023 draft version of the Secondary Plan, committing to the provision of a block of land for affordable housing within the MTSA limits of the Plan Area.

One consideration CCP contemplated was whether to base a proposed land dedication size on being a percentage of the overall developable area within the Secondary Plan Area or basing it on an overall percentage of the total number of anticipated units for the Secondary Plan Area. Attached to this letter as ***Appendix A (Peel Region: Affordable Housing Dedication – Project Comparison)*** is a Table depicting some project comparisons of affordable housing dedication that have occurred in other projects in Peel Region (including Mayfield West Phase 2, Lakeview, and Argo TFP). This looks at the size in acres that has been provided and translates that into possible units (based on zoning permissions) and a percentage of (possible) affordable units, compared to total community units. The Mayfield West, Lakeview and Argo TFP land contributions were calculated based on providing a certain percentage of units of the overall total number of units as affordable.

Specifically, Mayfield West provides land contribution that would facilitate affordable housing of 7% of the total number of units in the Secondary Plan Area. Lakeview provides for 5% of the first 8,050 units to be affordable through their land contribution, and Argo TFP provides for 4% of the total number of anticipated units in the community to be affordable through their land contribution.

Considering that this transit oriented community will be designed to have higher density than anything else within Caledon, it is therefore logical that the Caledon Station Secondary Plan provide for 5% of the units in the overall Secondary Plan Area as affordable (which is comparable to other developments in Peel) **through a land contribution of approximately 1.89 acres**. This land area equates to approximately 0.45% of the total net developable area within Caledon Station, which is comparable to the Mayfield West contribution of 7.17 acres which represents approximately 1% of the net developable area in that Secondary Plan Area.

Appendix B (Caledon Station: Affordable Housing – Land Dedication) and *Appendix C (Example Caivan Communities (Bronte) Ltd)* outline how an approximate land contribution of 1.89 acres in Caledon Station will provide for approximately 279 units, which represents approximately 5% of overall units within the Plan Area. As shown on *Appendix B*, there is a community wide proposal for a minimum of 5,576 units within the Secondary Plan Area. This minimum target was achieved through consideration of the minimum density of 150 p&j/ha within the MTSA coupled with the minimum density of 70 p&j/ha within the Greenfield Area (beyond the MTSA) in Caledon Station (per Tables 7.16 and 7.17 in the draft Secondary Plan).

CCP has gone further to complete an exercise to understand what area of land contribution would best facilitate the development of approximately 5% of the minimum units (279 units) within the Secondary Plan Area for affordable housing. This simplified analysis demonstrates how a land contribution of approximately 1.89 acres can achieve approximately 279 units through a 6-storey mid-rise building. This is broken down in *Appendix B* to provide greater understanding in terms of an estimated proposed height of 6 storeys, average size of a unit being 850 sq.ft., estimated building coverage (60%), total GFA within this sized block, and proposed parking to be provided per unit.

Furthermore, considering the available zoning permissions within the MTSA, Peel Living is encouraged to develop these lands to their full potential and develop a 12 storey building, which has been demonstrated to yield approximately 465 affordable housing units using similar assumptions to the above example. This is outlined on *Appendix B* also, under the ‘High-Rise Case Study’.

The assumptions made in *Appendix B* are further tested against an example development in Halton Region (Caivan Communities (Bronte) Ltd.), which is currently under construction and contained in *Appendix C*. This example has been included in this submission to provide the Region with a real world example of where a block of approximately 2.0 acres with 6 storeys can achieve a certain number of units, containing studio and 1 bedroom units, all the way up to 3 bedroom units.

This detailed examination of other projects and affordable housing proposals (*Appendix A*), coupled with a detailed review of Caledon Station and what is possible on a block size of approximately 1.8 to 2.0 acres (*Appendix B and C*) is helpful and compelling in terms of what can be offered in Caledon Station to satisfy the Region and Town policy directives related to the provision of affordable housing.

Summary:

While there are no specific policies that require a specific land dedication area or a requirement for a certain number of affordable units in Caledon Station, CCP recognizes and understands the importance of providing for, and committing to, the provision of affordable housing in Caledon Station.

This letter summary and appendices demonstrate that a block roughly sized at 2.0 acres will facilitate the development of approximately 280 to 465 affordable housing units, which represents a range of approximately 5% to 8% of the Caledon Station minimum total number of units across the Plan Area. The 5% scenario is consistent with what is being provided in other developments.

Certainly, the information contained herein has been simplified and assumptions have been made, and this does not represent a specific Site Plan Application for a particular block of land within Caledon Station. Rather, it is CCP's hope that this information and the proposed policy directives within the Caledon Station Secondary Plan which commit to this proposal will assist the Region and Town in having a level of comfort that a land contribution for a block sized at approximately 2.0 acres will more than satisfy the Region and Town policy directives related to the provision of affordable housing in Caledon Station.

It is proposed that this generous land contribution concept, coupled with the fact Caledon Station will ultimately be developed to contain a range and mix of housing types, densities, sizes and tenures, will satisfy the policy directives related to the provision of affordable housing in the Plan Area.

The Caledon Station Secondary Plan will contribute to the development of Bolton and will be established as a complete, transit-oriented community by introducing a mix of jobs, retail/commercial lands, local services, housing types and built forms, community infrastructure, and a full range of transportation options while ensuring natural heritage features are identified and protected.



Please do not hesitate to call if you have any questions or require more information in addition what is outlined in this letter. We continue to be dedicated to continuing this important work with the Town of Caledon to advance this significant and exciting project.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Karen Bennett, MCIP, RPP
Partner

Cc: Town of Caledon (Tanjot Bal)
Caledon Community Partners
Caledon Station Consulting Team

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Appendix A

PEEL REGION: AFFORDABLE HOUSING DEDICATION - PROJECT COMPARISON

Date: December 15, 2023

	Mayfield West Phase 2 - Stage 1 & 2	Lakeview	Argo TFP	Caledon Station
Acres Committed / Proposed	7.17 acres	n/a	n/a	1.89 acres
<i>Commitment: % of NDA</i>	1%	n/a	n/a	0.45%
<i>Commitment: Units Committed</i>	n/a	1198	76	n/a
<i>Commitment: Units Allowed</i>	428	n/a	n/a	279+
<i>Commitment: % of Proposed/Committed Units in Community</i>	MW2 Community = 7% MW2-1 = 5% MW2-2 = 11%	5% of the first 8,050 units 10% affordable/attainable on the remaining units	4%	5%
Community Wide: Proposed Units	5,784	16,000	1,725	5,576
Permitted Height per Zoning	MW2-1 - RT-667 Zone: 6 storeys (affordable apartments); 4 storeys (ground oriented) MW2-1 - RT-636 Zone: 18 units per lot MW2-2 - MR Zone: 32m	10C & 10D Area: 10 storeys RA5 Zone: No maximum height	MU Zone: No maximum height	MTSA: No maximum height RM-YY Zone RT-615: 17m Dwelling, Townhouses, Stacked: Greater of 20m/5 storeys Apartment Buildings: 12 storeys (48m)

Notes

Areas of parkland, roads (and road widenings) and SWM were not deducted from NDA per MW

MW2 was 0.89ac short, so the Region accepted cash for the deficiency

"Units Allowed" for MW2 is based on industry examples (i.e. 25 units per storey)

MW2 ROPA approved in 2020

Lakeview Draft Plan Approved in 2021

Argo TFP Draft Plan Approved in 2022

Argo TFP - Obligation based on number of units

Lakeview - Obligation based on percentage of units

Lakeview - Phase 1: 5% of 8,050 units. Through MZO - Phase 2: 10% attainable and affordable on the additional units

Appendix B

CALEDON STATION: AFFORDABLE HOUSING - LAND DEDICATION

Caledon Station Proposal	
NDA acres (<i>less employemnt, NHS, Railway</i>)	424
Community Wide - Proposed Units	5,576
Acres Proposed:	1.89 acres
<i>Commitment: Projected Units</i>	279
<i>Commitment: % of Proposed Units in Community</i>	5%
Max Height per Zoning	MTSA: No maximum height RM-YY Zone RT-615: 17m Dwelling, Townhouses, Stacked: Greater of 20m/5 storeys Apartment Buildings: 12 storeys (48m)

Mid-Rise Case Study	
279	Total Units
850	Avg. Sq ft per unit
80%	Efficiency (minus lobby, storage areas, amenity rooms, and other common areas)
296,225	GFA
6	Total Building Storeys
49,371	Building Coverage (Sq Ft)
60%	Coverage Ratio (surface parking, landscaping, etc.)
1.89	Block Size (acres)

Case Study - Underground Parking Requirement	
279	Total Units
0.7	Parking Spots Required per Unit
195	Required Parking Spots
110	Avg. # of Ungerground Parking Spots per Block Acre
2	Levels of Underground Parking Required

Assumptions

Efficiency: Altus Group Economic Conculsting, 2018

https://www.bildgta.ca/Assets/Bild/EducationalLibrary/BILD_Report.pdf

Average Square Footage Per Unit: NBLC, 2021

<https://www.peelregion.ca/officialplan/review/pdf/NBLC-IZ-Feasibility-Analysis-Dec-2021.pdf>

Only 2-bedroom units

110 underground parking spots per acre

Per proposed draft Zoning Bylaw - Parking for apartment units shall be provided at a minimum of 0.7 spaces per unit

Mid-Rise Case Study	6-Storey Mid-Rise Comparison	Caivan - Saw Whet Block
1.89	Block Size (ac)	1.98
6	Number of Storeys	6
279	Total Units	333
296,225	GFA	229,819
49,371	Building Footprint	42,926
60%	Coverage Ratio	50%
2	Levels of Underground Parking	2
220	Underground Parking Provided	380

High-Rise Case Study	
465	Total Units
850	Avg. Sq ft per unit
80%	Efficiency (minus lobby, storage areas, amenity rooms, and other common areas)
494,063	GFA
12	Total Building Storeys
41,172	Building Coverage (Sq Ft)
50%	Coverage Ratio (surface parking, landscaping, etc.)
1.89	Block Size (acres)

Case Study - Underground Parking Requirement	
465	Total Units
0.7	Parking Spots Required per Unit
326	Required Parking Spots
110	Avg. # of Ungerground Parking Spots per Block Acre
3	Levels of Underground Parking Required

Assumptions

Efficiency: Altus Group Economic Conculsting, 2018

https://www.bildgta.ca/Assets/Bild/EducationalLibrary/BILD_Report.pdf

Average Square Footage Per Unit: NBLC, 2021

<https://www.peelregion.ca/officialplan/review/pdf/NBLC-IZ-Feasibility-Analysis-Dec-2021.pdf>

Coverage Ratio at 50% to account for additional surface parking due to more residents

Only 2-bedroom units

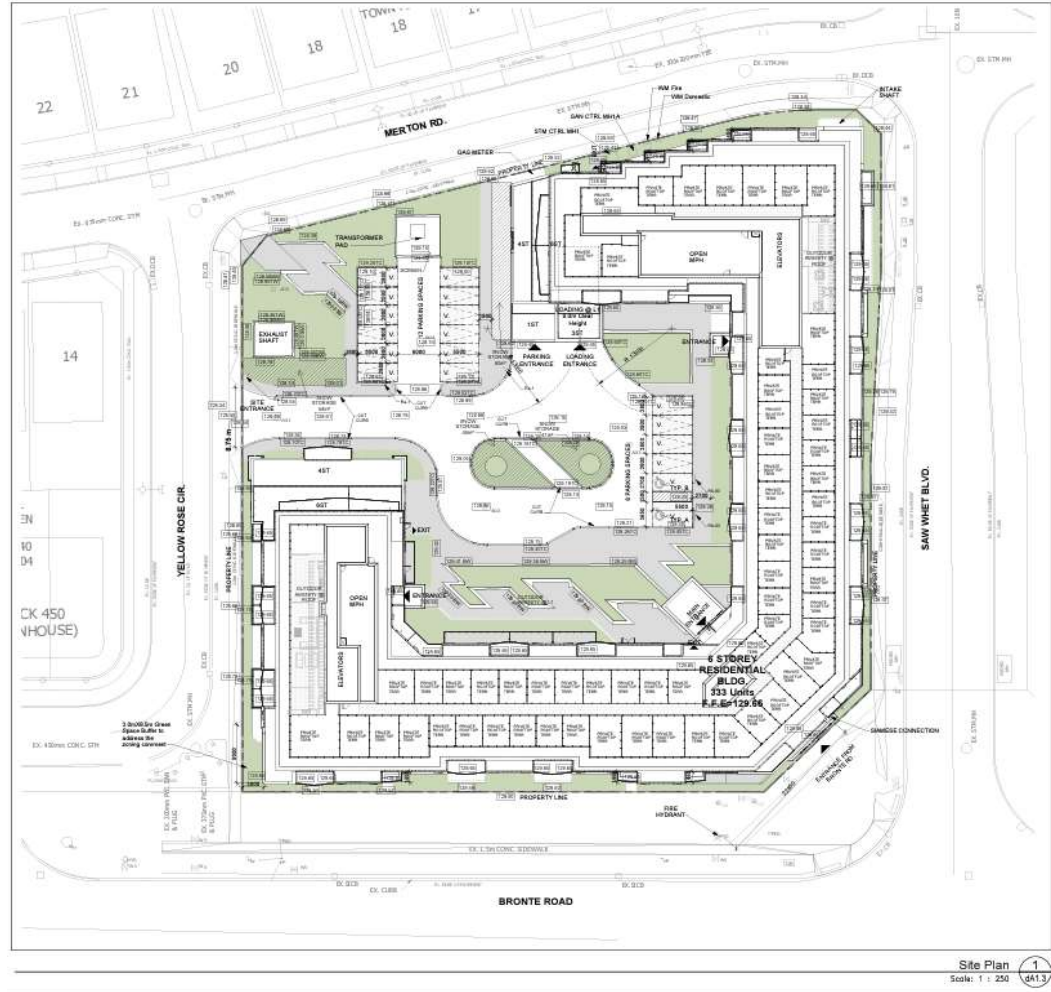
110 underground parking spots per acre

Per proposed draft Zoning Bylaw - Parking for apartment units shall be provided at a minimum of 0.7 spaces per unit

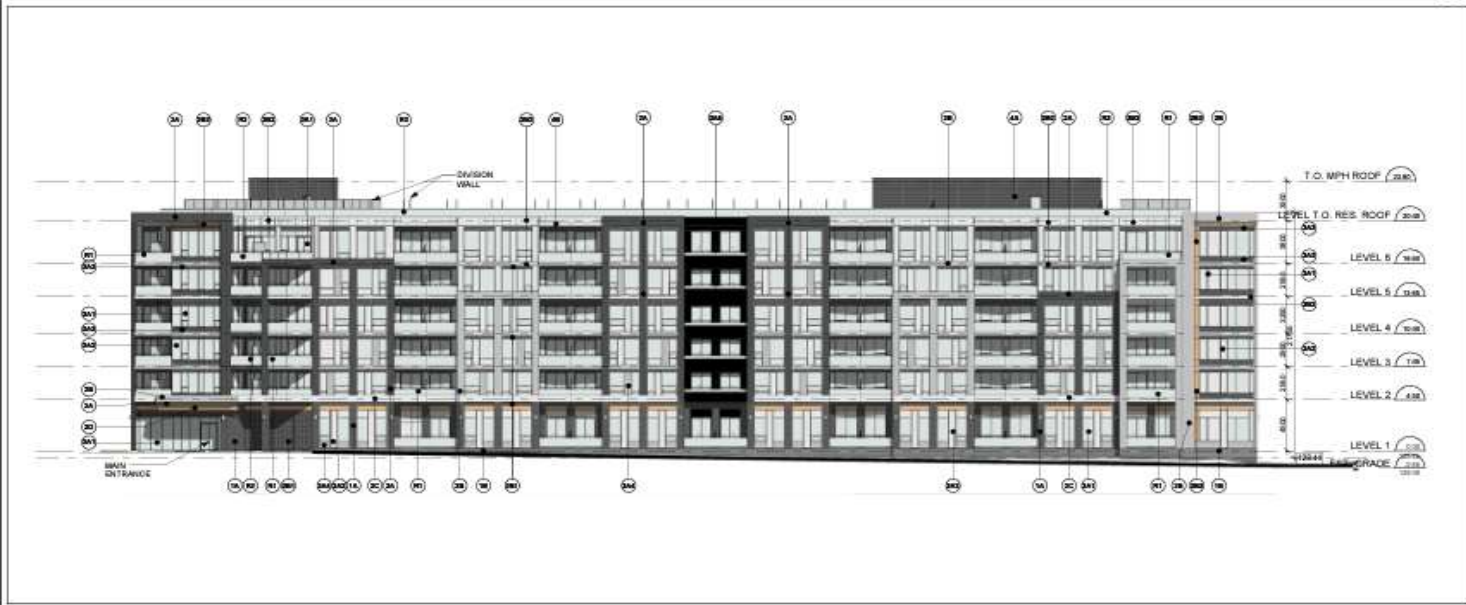
CAIVAN COMMUNITIES (BRONTE) LTD. - 2501 SAW WHET BOULEVARD

Caivan - Saw Whet Block Statistics	
Block Size (ac)	1.98
Number of Storeys	6
Total Units	333
Studio	4
1B	94
1B+D	138
2B	67
2B+D	22
3B	8
Levels of Underground Parking	2
Total Stalls (incl. surface parking)	398
Building Area	42,926

*Approved development by the Town of Oakville



South Elevation 3
Scale: 1 : 200



East Elevation 2
Scale: 1 : 200



EXTERIOR FINISH LEGEND	
1A	EXTERIOR WALL - CONCRETE (CONCRETE) / METAL PANEL (METAL PANEL) / METAL PANEL (METAL PANEL)
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EXTERIOR FINISH LEGEND 1
NTS