

June 11, 2024

Planning, Building and Growth Management Department
2 Wellington Street West, 3rd Floor
Brampton, ON L6Y 4R2

Attention: Mr Sadeef Shahid-Hussain, Development Planner

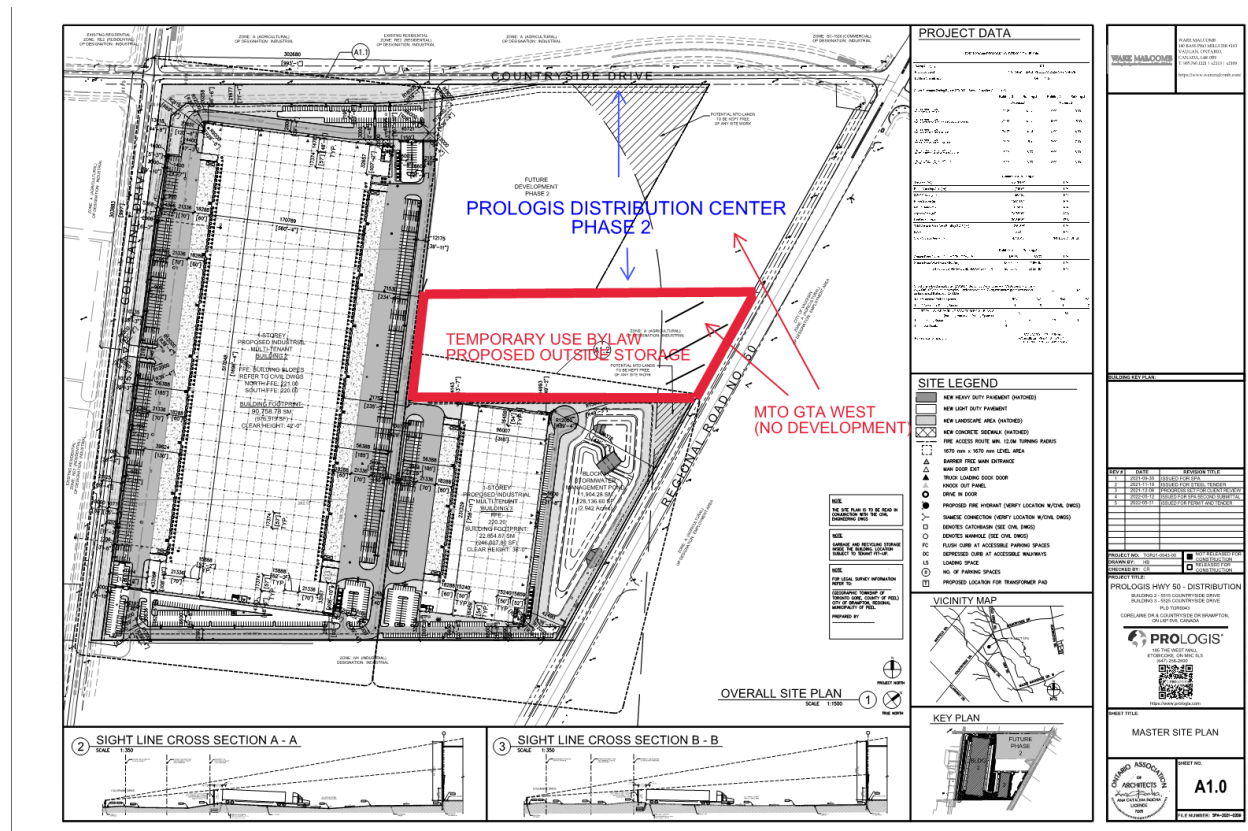
Sent By Email: Sadaf.shahidhussain@brampton.ca

RE: Blackthorn Development Corp.-2798536 Ontario Inc.; Application for Zoning Bylaw Amendment; Site Address: 0 Highway 50; City File No. OZS-2024-0008. Ward 10

We represent PROLOGIS ('AMB AMALCO BP 1 & 3 Camco, Inc. '), the owner of lands surrounding the above referenced site identified by the **red border** in Figure 1.

According to the City's Public Notice, Blackthorn Development Corp.-2798536 Ontario Inc. ('the applicant') is "proposing a temporary Zoning By-law Amendment to permit the temporary use of the subject lands for truck and trailer storage for a period of 3 years".

Figure 1: Prologis Site Plan



Executive Summary

We are directed by PROLOGIS to inform the City that **we object to the above referenced Zoning Bylaw Amendment** to permit the 'temporary' use of lands **for outside storage of any kind** including but not limited to Truck, container or trailer storage ('the proposal') as it is NOT good planning nor is it supported by Provincial or Municipal policies.

It is our considered and professional planning opinion that development of any kind is prohibited by Provincial and Municipal policies as **the property is under a development moratorium until the GTA West Focused Study Area is removed.**

Moreover, it is our opinion that the proposal undermines the highest urban design standards imposed upon this business park and the significant funding of major stakeholders in developing the Secondary Plan, and infrastructure to support development presently underway valued in the hundreds of millions of dollars not to mention the expectations of our Fortune 500 tenant that would be adversely impacted by this proposal.

Furthermore, the property abuts a major arterial road and pursuant to recently adopted Official Plan and Secondary Plan policies **shall NOT be used for outside storage including truck trailer parking** as the proposal contemplates *"190 trailer parking bays and 19 truck parking bays including a full movement access onto Highway 50"*... that would conflict with or cause significant impact on this prestige industrial park.

Finally, it is our considered and planning opinion that this application should be refused as it is NOT good planning to introduce a truck and trailer storage facility within a 'Gateway' employment park.

Background:

We understand that the applicant is NOT a member in good standing with the Block 47 Landowner Group ('Landowner Group'). The Landowner Group has worked diligently with City staff for years to address policy matters to prepare this site for 'Prestige Industrial Development' and has financed the development fabric for this entire business park INCLUDING the Blackthorne property.

The proposal undermines the substantial financial commitment by the Landowner Group to facilitate infrastructure improvements and obtain necessary agency and city approvals to assure the development of lands is appropriate development consistent with the City's vision to provide significant employment for its citizens pursuant to the Provincial Growth Plan and Policy Statements. A parking storage yard for trucks and trailers is counter intuitive to this vision and creates a significant adverse impact on PROLOGIS and its AAA tenants including a 1,000,000 square foot Distribution Building and Headquarters for LULULEMON. It is important to consider that 2 of 3 buildings are presently under construction and the third listed for future development once the GTA West Corridor moratorium on development is removed. All three significant buildings abut the Blackthorne property and would be adversely impacted by this application.

Precedence

PROLOGIS had considered a temporary use of land to underwrite financing their 90 acre property as the lands remained underutilized for over 10 years while awaiting development approvals; however, respected the City's direction to **NOT use the land for outdoor storage** in the interim.

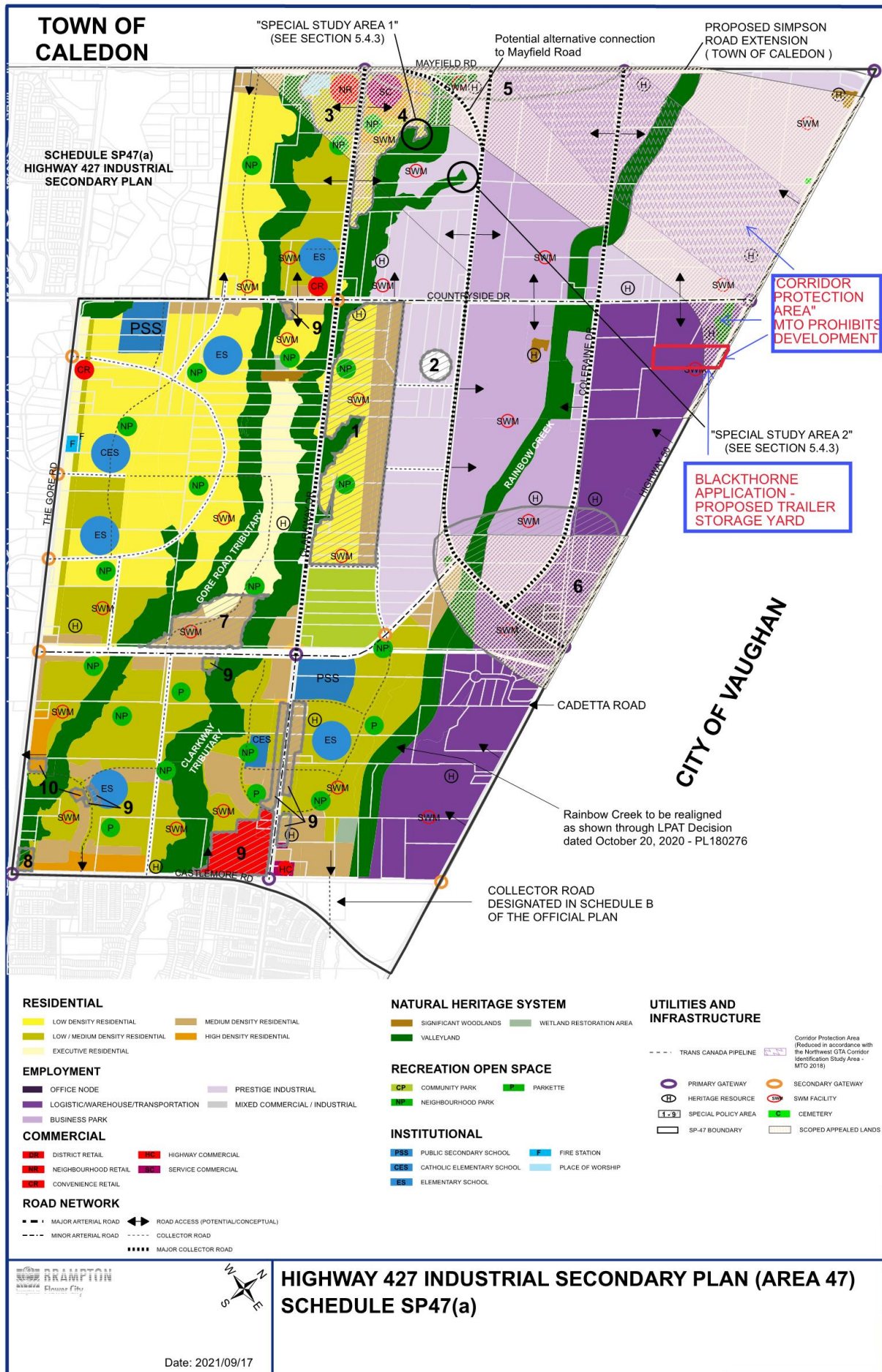
We are directed to inform that it would be inappropriate to support this proposal for a use that is contrary to the highest urban design standard required of this Landowner Group. An outdoor storage application is NOT helpful in creating significant employment and causes only adverse impact on this business park. The application is repugnant now that the Landowner Group has invested hundreds of millions of dollars in carrying costs, professional studies, plans, applications, development charges, the construction of infrastructure, consulting and legal fees, building permits etc. and it is contrary to the City's vision for this Gateway Business Park. The proposal will undermine the quality of development and surroundings expected by PROLOGIS and their AAA and Fortune 500 tenants.

Planning Opinion

The Application Should be REFUSED:

This application should be REFUSED as there is a Provincial moratorium on development over lands within the GTA West Corridor Focused Study Area. The Blackthorne property is clearly within the moratorium area and for this reason alone should NOT be considered [see Figures 1 and 2].

Figure 2: Secondary Plan Designations



The Application is NOT Good Planning:

It is our considered and professional planning opinion that **this application should NOT be approved as it is NOT good planning to allow land to be used for the outside storage of 190 trailers on lands designated for Employment and within an established gateway employment park.**

- ✓ This Employment Park is being constructed to the City's highest architectural and urban design standard and is intended to attract AAA businesses. In the case of an abutting property owned by PROLOGIS this proposal will provide an unsightly use adjacent to a one million square foot building that is about to be turned over to LULULEMON for their national distribution headquarters that will provide the city over 1,000 new jobs.
- ✓ Secondary Plan policy 5.2.1.2 provides that "*development within the lands designated... Logistics/Warehouse/Transportation **can proceed based on individual ... site plan applications, where appropriate, ... subject to submitting the following studies that consider the natural heritage system, floodplain management, stormwater management, existing arterial roads and development staging constraints as determined in consultation with the City: an Urban Design Brief, an Environmental Impact Study, a Functional Servicing Report, a Traffic Impact Study and a Cost Sharing Agreement.***"
- ✓ The intent of policy 5.2.1.2 to attract significant Employment Tenants is undermined by **this proposal** to instead utilize this property as a massive truck and trailer storage yard on a temporary or potentially permanent basis. This application is contrary to the intent of development of this land for an Employment building as envisioned by the Landowner Group and the City in the Block 47-3 Industrial / Office Tertiary Plan. [see Figure 3]
- ✓ **The application is NOT in conformity with Secondary Plan policy 5.2.9.5.** Section 5.2.9.5 requires "***Outside storage areas including truck trailer parking shall not directly abut arterial roads...***" yet this 10-acre property fronts on Highway 50 and will be covered with trailers. [see figure 3 and 4]
- ✓ The in-force Zoning Bylaw ('ZBL') designates the subject property 'A – Agricultural'. **Outside Storage is NOT listed as a 'permitted use'.**

The Proposal Fails to Address Official Plan Tests for Temporary Use Bylaws:

It is our considered and professional planning opinion that **the application fails to address several policy tests** and therefore **this application should be REFUSED.**

- ✓ As noted previously and contrary to New OP policy 5.12.43.a, **the proposal does NOT conform to the policies of Brampton Plan (new OP and old OP).**
- ✓ Contrary to New OP policy 5.12.43.c **the proposal is NOT compatible with the surrounding Business Park uses** including the development of land and buildings on abutting PROLOGIS land.
- ✓ Contrary to New OP policy 5.12.43.e, **the proposal WILL create significant traffic issues** within the surrounding area.
- ✓ Contrary to New OP policy 5.12.43.g, **the proposal is UNDESIRABLE and NOT COMPATIBLE** with the surrounding community. [see figure 4]
- ✓ Contrary to Old OP policy 5.10.2(i), **the Proposal WILL create an adverse impact on the adjacent complying uses**, in this case PROLOGIS and its AAA and FORTUNE 500 tenants.
- ✓ Contrary to Old OP policy 5.10.2(ii), **the proposal WILL adversely affect surrounding uses with "air pollution, odour, noise, light or traffic generation"**. [see Figure 4]
- ✓ Contrary to Old OP policy 5.10.2(iii), **the proposal INTERFERES "with the development of adjacent areas that are developing in accordance with this Plan"**.

Figure 3: Tertiary Plan



Figure 4: Photos of Outdoor Storage of Truck Containers



HWY 50 (just south of Mayfield), Brampton



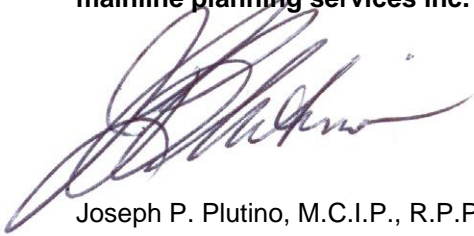
Mayfield Road, Brampton

Considering the aforementioned, we strongly recommend that the City refuse this application as it is NOT good planning. Please add Mainline Planning and Mr. Bill Bolender as interested parties to this process that will be notified to participate in the decision-making process including public consultations and meetings. Our contact details are as follows:

- ✓ Mr. Bill Bolender, Vice President, Country Manager. Email: wbolender@prologis.com
- ✓ Mr. Joseph Plutino, Mainline Planning Services, PO Box 319, Kleinburg, Ontario, L0J 1C0.
Email: jplutino@mainlineplanning.com

Thank you in advance for this consideration.

mainline planning services inc.

A handwritten signature in dark ink, appearing to read 'J. Plutino', is written over the printed name of Joseph P. Plutino.

Joseph P. Plutino, M.C.I.P., R.P.P.

cc. Client