
From: Mustafa Ghassan
Sent: 2021/10/05 2:31 PM
To: City Clerks Office <City.ClerksOffice@brampton.ca>
Cc: Michael Gagnon <mgagnon@gwdplanners.com>; Andrew Walker <awalker@gwdplanners.com>; Michelle Harris <mharris@gwdplanners.com>; Myron Pestaluky <myronp@deltaurban.com>; Hatim Jafferjee <hatimj@deltaurban.com>; Sajjad Ebrahim <sajjad@Ebrahim.com>
Subject: [EXTERNAL]Lark Investments Inc. - Minister's Zoning Order Resolution Request

Good afternoon,

Please find attached correspondence on behalf of Lark Investments Inc.

We would appreciate for this matter to be heard at the October 13th, 2021 Committee of Council meeting, with consideration for ratification at the October 20th, 2021 City Council meeting.

The attached is a compressed version to accommodate email capacity. A higher resolution version of the submission can be downloaded through the secure link below:

<https://app.securesafe.com/app/#/receipt?userIdentifier=266acf68-ae76-40ba-868d-d9b5b7d1ee65&accessToken=5ece34fbd50987b78eb84d2f21a718cc&securityToken=hihe.81fe.fede>

Should you have any questions, please don't hesitate to contact us.

Thank you & Regards,

Mustafa Ghassan



8800 Dufferin Street, Suite 104 | Vaughan, ON | L4K 0C5 | Tel: 905-660-7667 Ext. 232 | Cell: 647-833-3047 | Fax: 905-660-7076
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October 5, 2021

Sent via email cityclerksoffice@brampton.ca

The Corporation of the City of Brampton
c/o City Clerk's Department
2 Wellington Street West
Brampton, ON L6Y 4R2

Attention: Mayor and Members of Council

**Re: Lark Investments Inc.
Minister's Zoning Order Resolution Request
"Emerald Heights" Community – City of Brampton**

Dear Mayor Patrick Brown and Members of Council,

We are writing to you on behalf of our client Lark Investments Inc. (the "Client") with respect to lands located at the northwest corner of Bramalea Road and Steeles Avenue (the "Subject Lands"), as identified in the attached Ownership Plan (Schedule A). The Subject Lands are approximately 15 hectares in size and are known municipally as 10 and 26 Victoria Crescent; 376, 387 and 391 Orenda Road; and 24 Bramalea Road in the City of Brampton. The Subject Lands are located within the Region of Peel's preliminary Bramalea GO Major Transit Station Area ("MTSA") boundary, and within the Bramalea Mobility Hub Secondary Plan area.

The objective of this letter is to introduce our client's "*Emerald Heights*" vision: to transform the Subject Lands from existing low-order industrial uses towards a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/supportive and pedestrian friendly. The *Emerald Heights* proposal contemplates approximately 6,427 residential units and 1,237 jobs (provided through office and commercial space), which will assist the City of Brampton and the Region of Peel in meeting growth targets, as well as alleviating some of the housing supply and affordability crisis within the City, Region, and the Province. **In this regard, we are requesting Council's consideration for a resolution endorsing and supporting a Minister's Zoning Order ("MZO") for the implementation of our Client's vision, which will serve to deliver considerable benefits to the City of Brampton, the existing surrounding communities, and the Region of Peel.**

The *Emerald Heights* proposal has been carefully evaluated and assessed by a multi-disciplinary team of consultants to support the proposal from a planning, engineering, economic, and transportation perspective, all in an effort to transform the existing community into a multi-faceted residential mixed-use community. The team of consultants are identified as follows:

- Gagnon Walker Domes Ltd. – Land Use Planning
- Bousfields Inc. – Urban Designer



- Altus Group – Land Economist
- SCS Consulting Group Ltd. – Civil Engineering
- LEA Consulting Ltd. – Transportation Planning/Engineering
- Stantec – Rail Engineering

The work undertaken by the consulting team has demonstrated that the proposed vision is appropriate, sensible, and makes excellent use of the existing infrastructure and investments that have been made within the immediate area. As such, we are pleased to bring forward this vision for *Emerald Heights* which will be a destination in the City of Brampton that will serve both the short and long term needs of the City from both a housing and employment perspective.

Summarized below are some of the key elements of the *Emerald Heights* proposal that support our request and the vision. Attached is a context map that provides a general overview of these key elements:

- 1) The Subject Lands are within the Bramalea GO MTSA as described on the “MTSA Boundary Delineation” mapping identified in the December 2020 Region of Peel Staff Report. The *Emerald Heights* proposal will support intensification within the Bramalea GO MTSA and alleviate the shortfall in density targets currently projected by the Region of Peel for the Bramalea GO MTSA (targeted for 150 people and jobs per hectare and currently calculated at 17 people and jobs per hectare).
- 2) The *Emerald Heights* proposal will make excellent use of existing transportation and transit infrastructure in the area. Metrolinx is making significant investments to improve the Kitchener GO corridor to accommodate two-way all-day service, as well as major improvements at the Bramalea GO Station. The vision for *Emerald Heights* seeks to capitalize on these investments, while making efficient use of existing Bus Rapid Transit along the Steeles Avenue East corridor, all of which will facilitate a shift in the way people move and encourage a reduction on car dependency to meet the goals of the City’s Community Energy and Emissions Reduction Plan (CEERP).
- 3) The redevelopment of the subject lands to accommodate a higher density-built form will serve as an urban gateway into the City of Brampton, complemented by a comprehensive open space and trails system which will facilitate a seamless transition to the existing residential community to the north and will ultimately improve connectivity of the entire neighbourhood.
- 4) The vision for *Emerald Heights* proposes a grand central landscaped boulevard in addition to a number of road network improvements that will improve vehicular and active transportation movement throughout the site and serve as gateway features to the existing residential community to the north. The road and pedestrian network are predicated on a traditional urban grid, which will facilitate the penetration of lots and blocks, thereby animating rights-of-way and encouraging a vibrant at-grade public realm. They will create both pedestrian and active transportation connections between developments and throughout the whole of the Bramalea GO Station Mixed Use Neighbourhood.
- 5) The redevelopment of the subject lands will introduce close to 6,500 residential units which will assist the City of Brampton and Region of Peel in generating approximately \$250 - \$450 million in Development Charges (based on current Development Charge rate for Apartment less and greater than 750 sq.ft.).



- 6) A high-level servicing analysis and assessment was conducted, concluding that there are no significant challenges presented by the proposed redevelopment concept, and that necessary upgrades to the existing infrastructure are readily implementable.
- 7) The City of Brampton is currently working on finalizing the design and project timeline for the 'new' Victoria Park Area and Sport Hall of Fame, which is located within the proposed *Emerald Heights* Area. The proposed introduction of additional residential uses within the Bramalea GO Station Mixed Use Neighbourhood would be supported by the activities planned to be accommodated within the 'new' Victoria Park Recreation Complex.

The lands surrounding the Bramalea GO Mobility Hub are currently entering a period of transformation, as some of the lands have already been redeveloped with residential buildings. These are the Medallion 'Compass' residential apartment buildings at 64 and 68 Bramalea Road, and the proposed mixed-use residential and retail and office/commercial building at 69 Bramalea Road. The *Emerald Heights* proposal will provide a clear vision forward for a unified approach to transform the subject lands to a robust, multi-faceted complete community, which will deliver additional services and facilities to both existing and future residents. The implementation of this vision will make efficient use of existing under-utilized land which is easily accessible via existing transit and transportation infrastructure. It is well serviced, and is within a planning policy area which contemplates higher order uses to meet the housing and intensification needs within the City of Brampton.

We believe that our client's proposal is a logical extension and next step for this community, as it builds on existing infrastructure put in place by the City of Brampton, Region of Peel, and Province of Ontario. It capitalizes on intensification opportunities associated with the Bramalea GO Station, as well as existing and planned transportation, transit and servicing infrastructure. We respectfully request that the City support our client's vision. We acknowledge that an MZO would provide an opportunity for the City of Brampton to transform the currently under-utilized Bramalea GO MTSA to a high-density mixed-use community in an expedited and accelerated manner.

Yours Very Truly,

Mustafa Ghassan
Delta Urban Inc.

cc. *Sajjad Ebrahim, Lark Investments Inc.*
Michael Gagnon, Gagnon Walker Domes Ltd.
Andrew Walker, Gagnon Walker Domes Ltd.
Michelle Harris, Gagnon Walker Domes Ltd.
Myron Pestaluky, Delta Urban Inc.
Hatim Jafferjee, Delta Urban Inc.

Enclosed.

Schedule A – Land Ownership Map
Context Map
Planning Justification Report by Gagnon Walker Domes Ltd.

Schedule A – Land Ownership Map

Prepared by Delta Urban Inc.



Bramalea and Steeles Ownership Map



#	Ownership Legal Name	Area (ha)	Municipal Address
1	EBRAHIM INVESTMENTS INC.	1.076	10 Victoria Cres
2	LARK HOLDINGS #2 INC.	1.741	376 Orenda Rd
3	CP REIT ONTARIO PROPERTIES LIMITED	2.244	379 Orenda Rd
4	REICHOLD INDUSTRIES LIMITED	2.200	383 Orenda Rd
5	2708110 ONTARIO INC.	0.811	380 Orenda Rd
6	2650549 ONTARIO INC.	0.484	15 Victoria Cres
7	1997243 ONTARIO INC.	0.589	19 Victoria Cres
8	EP 390 OREDA INC.	3.156	390 Orenda Rd
9	EBRAHIM PROPERTIES INCORPORATED	6.069	387 & 391 Orenda Rd
10	2695214 ONTARIO INC	0.406	24 Bramalea Rd
11	THE REGIONAL MUNICIPALITY OF PEEL	0.210	40 Victoria Cres
12	2221472 ONTARIO INC.	1.007	394 Orenda Rd
13	1271929 ONTARIO INC.	0.500	30 Victoria Cres
14	AARK NOMINEE INC.	2.582	26 Victoria Cres
15	ONTARIO AND CENTRAL PROPERTIES INC.	0.405	60 Bramalea Rd
16	MITHU & SONS LTD.	0.318	58 Bramalea Rd
17	T-K PILON HOLDINGS CORPORATION	0.401	56 Bramalea Rd
18	THE CORPORATION OF THE TOWNSHIP OF CHINGUACOUSY	0.312	N/A
19	ALECTRA REAL ESTATE HOLDINGS INC.	0.145	398 Orenda Rd
20	GLOBE REALTY HOLDINGS LTD.	0.386	50 Bramalea Rd
21	ADMNS BRAMPTON INVESTMENT CORPORATION	7.999	15 Bramalea Rd,
22	B. KHAN INVESTMENTS INC.	0.534	41 Bramalea Rd
23	HENTOB INVESTMENTS LIMITED	0.564	45 Bramalea Rd,
24	BRAMPTON HARDWOOD FLOORS LTD.	1.014	59 Bramalea Rd,
25	ALPHA GROUP OF COMPANIES LTD	0.913	109 East Dr
26	69 BRAMALEA HOLDINGS LIMITED	0.771	69 Bramalea Rd
27	MAC MOR OF CANADA LTD.	1.499	75 Bramalea Rd
28	SANTOS HOLDCO INC.	0.570	106 East Dr
29	DEBROB INVESTMENTS LIMITED;	3.043	110 East Dr
30	2707193 ONTARIO INC.	3.549	109 East Dr
31	N/A	2.419	114 East Dr
32	TARO PHARMACEUTICALS INC.	1.622	126 East Dr
33	2538821 ONTARIO INC.	2.029	115 East Dr
34	PACCAR LEASING COMPANY, LTD.	0.943	119 East Dr
35	B. & C. PACKAGINGS LIMITED	1.291	125 East Dr
36	1534738 ONTARIO INC.	1.268	129 East Dr
37	7602928 CANADA INC.	1.238	131 East Dr
38	QBD INTERNATIONAL INC.	1.840	1810 Steeles Ave E
39	2153461 ONTARIO INC.	2.028	1940 Steeles Ave E,
40	TWO O SEVEN O LTD.	2.025	2070 Steeles Ave E
41	STEELTON BUSINESS CENTRE INC.	4.124	2084 Steeles Ave E
42	CANADIAN TIRE CORPORATION	0.108	2021 Steeles Ave E
43	CANADIAN TIRE CORPORATION	33.135	2111 Steeles Ave E
Approx. Total		99.570	
Lark Investment Inc.		15.030	

- Lark Invesments Inc. Properties
- Public Lands
- Bramalea GO Preliminary MTSA Boundary
- Parcel Boundary

Context Map

Prepared by Bousfields Inc.



 **Schools**
 **Community Services**

**BRAMALEA
BUS
TERMINAL**

**BRAMALEA
CITY
CENTRE**

**PROPOSED
RESIDENTIAL/MIXED USE
NEIGHBOURHOOD**

**PROPOSED
BRAMALEA MOBILITY HUB
SECONDARY PLAN AREA**

**BRAMALEA MOBILITY HUB
SECONDARY PLAN AREA**

**REGION OF PEEL
PRELIMINARY MTSA
BOUNDARY**

**EXISTING
BRAMALEA
GO STATION**

**LESTER B.
PEARSON
INTERNATIONAL
AIRPORT**

EMERALD HEIGHTS

Contact

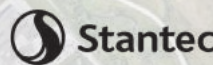
Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Gagnon Walker Domes Ltd.
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Lark Investments Inc.



DELTA URBAN



BOUSFIELDS INC.

September 2021

Housing Supply and Mix
Provide 6,427 new residential units in a mix of housing choices to meet the evolving needs of the community

Mixed Use Corridor
Re-urbanized street framed by pedestrian-scaled street walls and lined with active uses

Integrated Community
Create a balance of high quality residential, commercial institutional and open space uses that reduces car dependency, allowing residents to live, work, and shop in the same area

Gateway and Place-Making Opportunities

Transit-Supportive
Provide pedestrian-friendly built form and transit-oriented density to support Mobility Hub and rapid transit corridors to create districts along transit routes that are animated, attractive and safe

Compatible Development
Development that achieves the Provincial, Regional and Municipal policy objectives while responding appropriately to the existing built form context

Natural Heritage
Celebrate existing natural heritage and expand the open space network

Infrastructure-Supportive
Efficient use of existing and planned servicing and transportation infrastructure

Fine-Grain Street Network
Create more walkable blocks by providing connections that extend logically to the surrounding street network

Green Connections
Improve connectivity through linkages to existing trail and open space network



EMERALD HEIGHTS

Planning Justification Report

Prepared by Gagnon Walker Domed Ltd.

**10 & 26 VICTORIA CRESCENT
376, 387, 390 &
391 ORENDA ROAD
24 BRAMALEA ROAD**

EMERALD HEIGHTS VISION **PLANNING JUSTIFICATION REPORT**



Client:
Lark Investments Inc.

Project Team:
Gagnon Walker Domes Ltd.
Delta Urban Inc.
Bousfields Inc.
LEA Consulting Ltd.
SCS Consulting Group Ltd.
Altus Group Limited
Stantec Consulting Ltd.



Gagnon Walker Domes Ltd.

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Date: October 1, 2021

GWD File: 92.242.00



EXECUTIVE SUMMARY

Gagnon Walker Domes Ltd. (GWD) represents *Lark Investments Inc. (Lark)*, the Registered Owner of the properties municipally known as 10 and 26 Victoria Crescent, 376, 387, 390 and 391 Orenda Road, and 24 Bramalea Road, in the City of Brampton (hereafter referred to as the “subject lands”). GWD is working with Delta Urban Inc., LEA Consulting Ltd., SCS Consulting Group Ltd., Altus Group Limited, Stantec Consulting Ltd., and Bousfield’s Inc. Collectively, we are providing *Lark* with planning, engineering, land economic and marketing consulting services in connection with the Region of Peel 2051 Official Plan Review and Municipal Comprehensive Review, as well as the associated City of Brampton Official Plan Review.

The purpose of this Report is to support the re-designation and conversion of the Bramalea GO Station Mixed-Use Neighbourhood, including the subject lands, for residential/mixed-use purposes. *Lark* envisages that the lands located east and west of Bramalea Road, north and south of Steeles Avenue East will be redeveloped for mixed-use residential and employment purposes. *Lark* envisages that once the Bramalea GO Station Mixed Use Neighbourhood is fully redeveloped, it will accommodate in excess of 6,427 residential units and 1,237 jobs (of which 3,800 residential units and 840 jobs will be accommodated on the *Lark* lands).

In response to the opportunities presented within the Bramalea GO Station Mixed Use Neighbourhood, associated with the Bramalea GO MTSA, working with Bousfields, *Lark* and the project team have developed a *Vision* for “*Emerald Heights*”. *Emerald Heights* represents an opportunity to develop a mixed-use residential, retail and office commercial complete community, which will have immediate access to existing and planned community services and facilities as well as superior transportation and transit infrastructure.

The primary purpose of this Planning Justification Report (PJR) is to outline to the Region of Peel and the City of Brampton the redevelopment opportunities and merits of the *Emerald Heights Vision* in the context of the ongoing Municipal Comprehensive Review (MCR). This is particularly important as the Region of Peel advances the proposed MTSA Regional Official Plan Amendment. With the aforementioned in mind, the *Emerald Heights Vision* represents a planning and development opportunity to:

- Assist in increasing intensification opportunities within the MTSA and alleviate the significant shortfall in density targets currently projected by the Region of Peel for the Bramalea GO MTSA;
- Accommodate additional population within an area which is transitioning from low-density industrial uses to higher order uses;
- Accommodate transit-oriented, mixed-use development in accordance with and in support of provincial density and growth projections;
- Broaden the range of permitted land uses to include a mix of residential, office and retail/commercial, as well as personal service uses, all of which will form the basis of a complete community consisting of employment, residential, and community facilities;



- Provide enhanced employment uses and an increase in employment; including, more specifically, approximately 840 jobs versus the 583 existing jobs located in the area at present (an increase in the order of almost 44%);
- Support existing and planned public transit infrastructure which will optimize and maximize the use of Regional resources; reducing car dependency, encouraging greater use of the existing Bus Rapid Transit service along the Steeles Avenue East corridor and the existing Bramalea GO Transit Station, and providing additional housing within the limits of the Bramalea GO MTSA;
- Facilitate the efficient use of existing and planned servicing infrastructure;
- Facilitate a seamless transition with the existing residential community located to the north, as well as with the retail and office commercial, and high-rise residential development located to the east;
- Improve connectivity through linkages to existing trail and open space network, including celebrating and expanding the existing natural heritage and open space network; and
- Utilize the Spring Creek drainage feature as a natural boundary and buffer to the existing industrial uses located to the west thereof.

The *Emerald Heights Vision* advanced by *Lark* proposes a progressive and practical redevelopment plan for the Bramalea GO Station Mixed Use Neighbourhood; including, the subject lands, focused on the intersection of Steeles Avenue East and Bramalea Road. The ambitious plan imagines the development of a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/transit-supportive and pedestrian-oriented

The policy direction of the Growth Plan makes it necessary to review the planning framework under the Region of Peel 2051 Official Plan Review/MCR process and ultimately the City of Brampton Official Plan Review, leveraging the unique opportunities of the Bramalea Mobility Hub Secondary Plan Area. In the context of the aforementioned process, we respectfully request that the Region of Peel and the City of Brampton consider expanding the range of permitted uses, via the conversion of the lands located within the Bramalea GO Station Mixed Use Neighbourhood, to include residential, retail and office commercial, as well as other currently permitted employment uses. Doing so will assist in meeting Growth Plan density and land use targets.



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1.0 INTRODUCTION

Gagnon Walker Domes Ltd. (GWD) represents *Lark Investments Inc. (Lark)*, the Registered Owner of the properties municipally known as 10 and 26 Victoria Crescent, 376, 387, 390 and 391 Orenda Road, and 24 Bramalea Road, in the City of Brampton (hereafter referred to as the “subject lands”). GWD is working with Delta Urban Inc., LEA Consulting Ltd., SCS Consulting Group Ltd., Altus Group Limited, Stantec Consulting Ltd., and Bousfields Inc. Collectively, we are providing *Lark* with planning, engineering, land economic and marketing consulting services in connection with the Region of Peel 2051 Official Plan Review and Municipal Comprehensive Review, as well as the associated City of Brampton Official Plan Review.

The Region of Peel Public Works and Planning Staff tabled a Staff Report at the December 10, 2020 Regional Council meeting that provided a status update on the Peel 2051 Official Plan Review MCR. Delta Urban Inc. (Delta Urban) submitted a letter to the Region of Peel in advance of the Council Meeting. The submission letter, dated December 9, 2020 was tabled at the January 14, 2021 Regional Council Meeting (see **Appendix 1**).

The written correspondence included comments, observations and recommendations based on the review of various materials presented by Regional staff at the Peel 2051 Regional Official Plan Review Meetings, as well as the review of ‘Key Policies - Draft Regional Official Plan Amendment and December 10, 2020 Staff Report’ from Regional Public Works and Planning Staff.

The aforementioned written correspondence referenced our Client’s intention to submit a formal request to the Region of Peel to redesignate the subject lands in order to permit the development of residential/mixed-use. It is noteworthy that our Client’s intention to redevelop the subject lands for residential/mixed-use was previously shared with Regional Staff. The purpose of this Report is to support the re-designation and conversion of the Bramalea GO Station Mixed-Use Neighbourhood, including the subject lands, for residential/mixed-use purposes. *Lark* envisages that once the Bramalea GO Station Mixed Use Neighbourhood is fully redeveloped, it will accommodate in excess of 6,427 residential units and 1,237 jobs (of which 3,800 residential units and 840 jobs will be accommodated on the *Lark* lands). In addition, to the aforementioned residential and employment opportunities, there is additional potential for even more mixed-use development east of Bramalea Road and south of Steeles Avenue East as part of a future expanded neighbourhood. **Figures 1 and 2**, entitled Proposed Massing Concept – Land Use prepared by Bousfields Inc. illustrates what the neighbourhood could potentially look like.

1.1 **Region of Peel and City of Brampton Official Plan Review and Municipal Comprehensive Review**

By way of background, the Peel 2041 Official Plan Review exercise (rebranded as “Peel 2041+ Official Plan Review” and again recently as “Peel 2051”) represents the Region of Peel’s Official Plan Review/Municipal Comprehensive Review (“MCR”) exercise to establish conformity with the recent policy updates to the Provincial Plans; including the 2020 Provincial Policy Statement (PPS) and 2020 Growth Plan for the Greater Golden Horseshoe (Growth Plan). The Peel 2051 Official Plan Review conformity exercise and MCR includes, but is not limited to, the delineation



of Priority MTSA's, minimum densities for strategic growth areas (including MTSA's), and population/employment growth allocations.

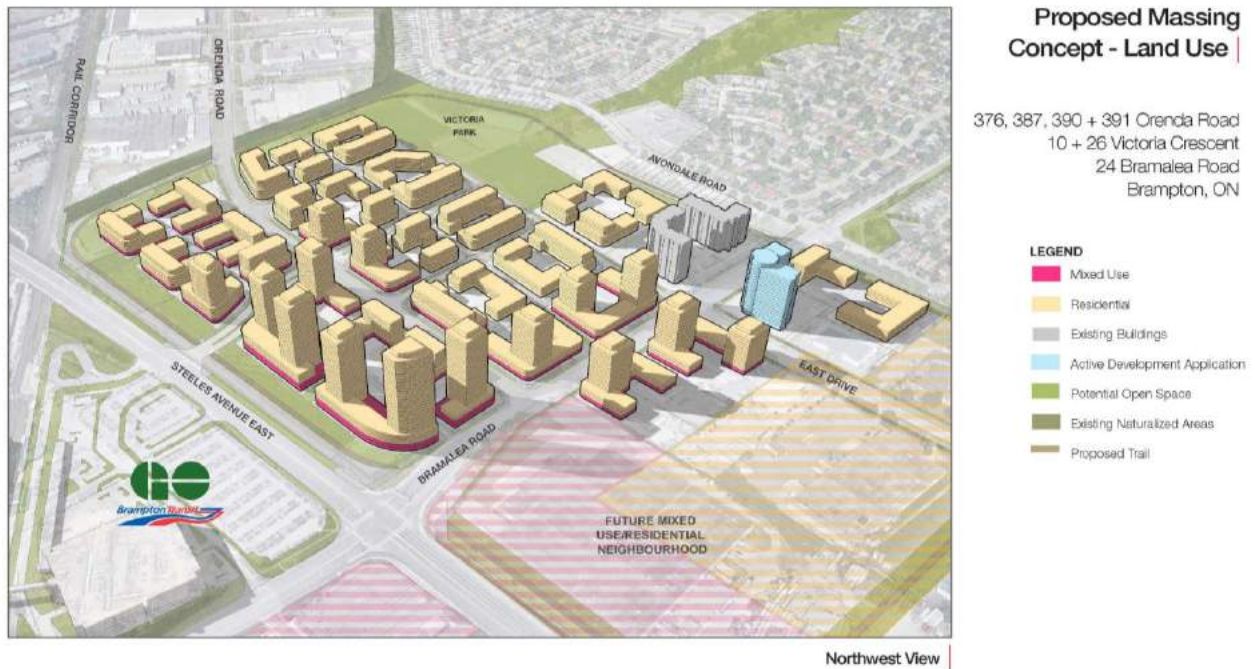


Figure 1: Proposed Massing Concept – Land Use

 BOUSFIELDS INC.



Figure 2: Proposed Massing Concept – Land Use

 BOUSFIELDS INC.



In 2019, the Region of Peel commenced the MTSA Focus Area review as part of the Peel 2051 Official Plan Review to examine MTSA's across the Region. In this regard, "Draft MTSA Profiles" have been advanced in the Region of Peel's April and May 2020 Direction Reports. The Draft MTSA Profiles for each MTSA within the Region identifies an 800-metre radius from an identified transit station or stop (per the definition of the MTSA in the Growth Plan), as well as a more refined "Preliminary Boundary Delineation" that is reported to be based on a consideration of the Region's identification of local opportunities and constraints, as well as other planning considerations.

On December 10, 2020, Regional Council considered a Staff Report from Regional Public Works and Planning Staff that provided a status update on the Peel 2051 Official Plan Review MCR. The Regional Staff Report recommended that the "Peel 2041+ Official Plan Review" public consultation period continue into 2021 with the objective of Regional Council's adoption of a final Regional Official Plan Amendment ("ROPA") by the end of 2021, and prior to the Provincial conformity deadline of July 1, 2022. The December 10, 2020 Regional Staff Report also included a draft ROPA that advanced a preliminary policy framework for the Region's MTSA's.

GWD has reviewed the December 10, 2020 Regional Staff Report (including the draft MTSA ROPA attached as Appendix III to the aforementioned Staff Report), the Region's MTSA Profile for the Bramalea GO Station as identified in the Region's April 2020 Phase 1A: Preliminary MTSA Review Report (April 2020 Report), the Region's May 2020 Policy Direction Report and the Region's December 2020 Phase 1B Report, as well as the Region's February 18, 2021 Presentations.

1.2 *Lark Investments Inc.*

The founder and president of *Lark* is Sajjad Ebrahim, an immigrant from Pakistan who in 1977 bought Par-Pak Ltd; a plastic food container manufacturing company which at the time employed 20 staff. Through his leadership, Par-Pak Ltd. grew into a major corporation with over \$200 million in revenue during 2013. Par-Pak Ltd. has operations in Canada, the United States of America and the United Kingdom. When Sajjad Ebrahim sold the company in 2013, it employed approximately 900 staff.

In honor of his entrepreneurial leadership, he received the prestigious, "Canada Award of Business Excellence" in the Entrepreneur Category in 2013. The Canadian Plastic Industry Association awarded him with the "Leader of the Year Award" in 2008 and the "Lifetime Achievement Award" in 2016. In addition, he received Doctor of Laws Honoris Causa from Ryerson University and "Lifetime Achievement Award" from the International Development and Relief Foundation (IDRF) for his Philanthropy work.

Today, Sajjad Ebrahim continues to lead an active business life, while devoting most of his time to social and philanthropic endeavours. From 2007 to 2012, he assisted in raising over \$1.0 M for the construction of the Brampton Civic Hospital, as well as making the single largest individual contribution in 2015 of \$2.5 M to the Peel Memorial Health and Wellness Centre, located in downtown Brampton.



In addition to the aforementioned, through the IDRF, he supports various projects located in Canada and overseas. Through a program entitled “Licensed to Work”, he supports programs for underprivileged students with tutoring. He has contributed generously to the Ronald McDonald House Charities in the City of Hamilton.

In 1988, the Planning Committee of the Islamic Shia Ithna-Asheri Jamaat of Toronto (ISIJ) under the Chairmanship of Sajjad Ebrahim held a brain storming session regarding how their organization could assist persons with low to moderate incomes find suitable housing. This led Sajjad Ebrahim in 1993 to establish and act as President of the Board of Crescent Village Housing Corporation (Crescent Village) located in the City of Richmond Hill; a not-for-profit housing complex jointly funded by both the Federal and Provincial Governments. Crescent Village is a thriving community consisting of 198 housing units, oriented toward persons with low to moderate incomes. Crescent Village is considered as one of the best managed not-for-profit housing corporations out of 47 providers in York Region.

2.0 PLANNING and DEVELOPMENT OPPORTUNITY

The subject lands are located within the Bramalea GO Major Transit Station Area (MTSA) “Preliminary Boundary Delineation”. The primary purpose of this PJR is to outline to the Region of Peel and the City of Brampton the redevelopment opportunities and merits of the subject lands in the context of the ongoing Municipal Comprehensive Review (MCR). This is particularly important as the Region of Peel advances the proposed MTSA Regional Official Plan Amendment. With the aforementioned in mind, the subject lands represent a planning and development opportunity to:

- Assist in increasing intensification opportunities within the MTSA and alleviate the significant shortfall in density targets currently projected by the Region of Peel for the Bramalea GO MTSA;
- Accommodate additional population within an area which is transitioning from low-density industrial uses to higher order uses;
- Accommodate transit-oriented, mixed-use development in accordance with and in support of provincial density and growth projections;
- Broaden the range of permitted land uses to include a mix of residential, office and retail/commercial, as well as personal service uses, all of which will form the basis of a complete community consisting of employment, residential, and community facilities;
- Provide enhanced employment uses and an increase in employment; including, more specifically, approximately 840 jobs versus the 583 existing jobs (an increase in the order of almost 44%);
- Support existing and planned public transit infrastructure which will optimize and maximize the use of Regional resources; reducing car dependency, encouraging greater use of the existing Bus Rapid Transit service along the Steeles Avenue East corridor and the



existing Bramalea GO Transit Station, and providing additional housing within the limits of the Bramalea GO MTSA;

- Facilitate the efficient use of existing and planned servicing infrastructure;
- Facilitate a seamless transition with the existing residential community located to the north, as well as with the retail and office commercial, and high-rise residential development located to the east;
- Improve connectivity through linkages to existing trail and open space network, including celebrating and expanding the existing natural heritage and open space network; and
- Utilize the Spring Creek drainage/lineal open space feature as a natural boundary and buffer to the existing industrial uses located to the west thereof; the feature is proposed to be extended to the east and north through the neighbourhood.

This PJR describes the subject lands and surrounding area, reviews the proposed redevelopment concept, summarizes formal submission(s) made to-date, provides highlights from the Region of Peel 2051 Review and MCR process, and outlines planning opinions within the context of the applicable planning policy regime.

3.0 SITE DESCRIPTION and SURROUNDING LAND USES

3.1 Subject Lands (*Lark*)

The lands owned by *Lark* (“subject lands”) are comprised of six (6) individual parcels, located northwest of the intersection of Steeles Avenue East and Bramalea Road, within close proximity to the Bramalea GO Station (see **Figure 3**). More specifically, the properties include:

- 10 Victoria Crescent and 376 Orenda Road, located at the northeast corner of Victoria Crescent and Orenda Road, with dual frontage of approximately 87.20 m on Victoria Crescent and 147.60 m along Orenda Road. The combined properties measure approximately 2.82 ha. 10 Victoria Crescent is vacant, while 376 Orenda Road is occupied by a 1-storey industrial building.
- 26 Victoria Crescent is located on the east side of Victoria Crescent; immediately east of the Victoria Park Soccer Stadium Field and west of the Medallion ‘Compass’ high-rise residential apartment towers. The property measures approximately 2.58 ha, with approximately 77.80 m of frontage along Victoria Crescent.
- 390 Orenda Road is located on the northwest corner of Orenda Road and Victoria Crescent, with frontage along two (2) municipal rights-of-way; including, approximately 172.00 m of frontage along Orenda Road, and 300.00 m on Victoria Crescent. The property measures approximately 3.16 ha, occupied by a 1-storey industrial building.
- 387 and 391 Orenda Road are located at the northwest corner of Steeles Avenue East and Bramalea Road with frontage along three (3) municipal rights-of-way; including,



approximately 364.00 m of frontage along Steeles Avenue East, 91.70 m along Bramalea Road, and 299.50 m along Orenda Road. The combined properties measure approximately 6.07 ha and are occupied by two (2) 1-storey industrial buildings. A Canadian National Railway spur line runs along the southern property limits.

- 24 Bramalea Road is located at the southwest corner of Bramalea Road and Orenda Road with frontage along two (2) municipal rights-of-way; including, approximately 62.40 m along Bramalea Road and 56.30 m along Orenda Road. The property measures approximately 0.41 ha and is occupied by a 1-storey commercial (auto repair shop) building.

Together, the subject lands have a combined gross area of approximately 15.04 ha. With the exception of 390 Orenda Road (which is occupied by Lassonde) and 24 Bramalea Road (which is vacant), the four (4) remaining properties are occupied by Polar Pak Ltd. These lands are located in the northwest quadrant of Bramalea Road and Steeles Avenue East, which for the purposes of this Report will be referred to as the “Bramalea GO Station Mixed Use Neighbourhood (see **Figure 3**). The subject lands represent 14.2% (15 ha) of the 106 ha located within the limits of the City of Brampton “Bramalea Mobility Hub Secondary Plan Area” (Secondary Plan Area 9).

3.2 Surrounding Area

The immediate surrounding area to the subject lands are described as the Bramalea GO Station Mixed Use Neighbourhood (see **Figures 4 and 5**). The surrounding area consists primarily of light industrial and warehousing uses located to the east, west and south of the subject lands. The lands to the north and beyond are developed for residential purposes, supported by numerous existing community facilities and commercial/retail uses; including, the James F. McCurry Victoria Park Arena and Fields, recreational trails and the adjacent Avondale Plaza.

The Bramalea GO Station Mixed Use Neighbourhood includes two (2) existing high-rise residential apartment buildings located at 64 Bramalea Road and 70 Bramalea Road; referred to as the Medallion “Compass” residential apartment buildings; described as follows (see **Figures 6, 7 and 8**):

- Collectively, having a total site area of 1.8 ha, located on the west side of Bramalea Road, approximately 51 m south of Avondale Boulevard;
- 64 Bramalea Road is a 360-unit, 12 to 19 storey residential apartment building;
- 70 Bramalea Road is a 254 unit, multi-terraced 6 to 14 storey residential apartment building;
- The buildings have a combined density of 341.1 dwelling units per net ha and a floor space index of 2.73;
- 70 Bramalea Road contains 750 sq. m. of ground floor retail/commercial space; 64 Bramalea Road consists only of residential apartment units; and



A total of 757 parking spaces are provided, consisting of 108 surface parking spaces, with 649 underground parking spaces.



Figure 3: Location Plan

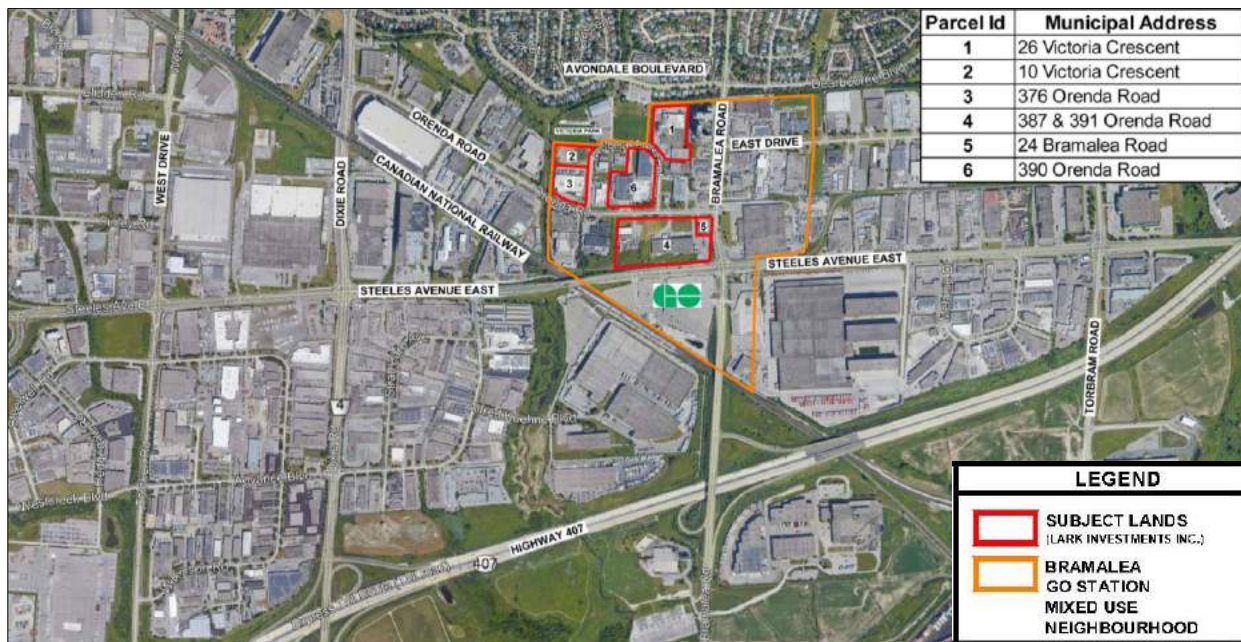


Figure 4: Context Plan

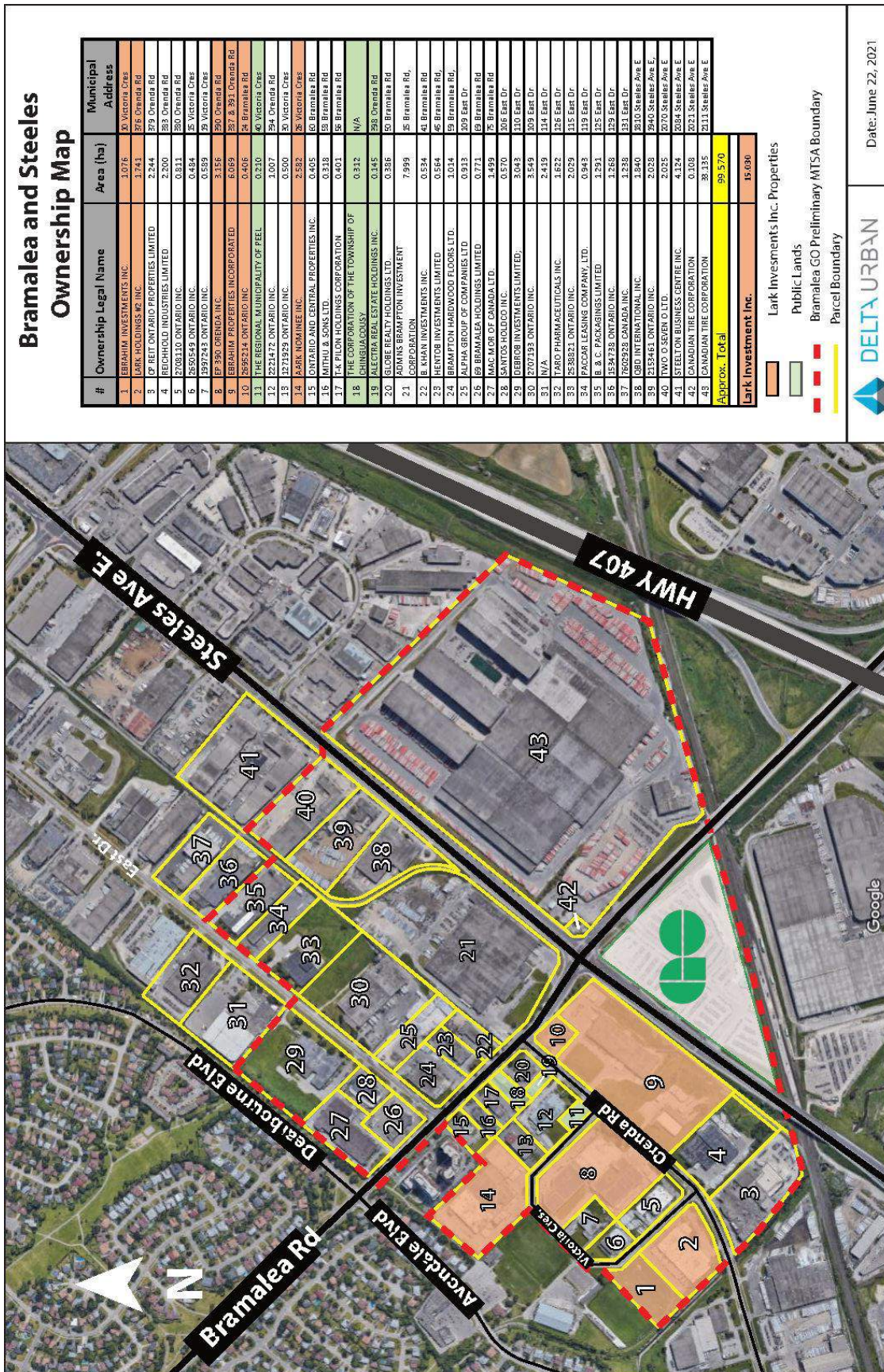


Figure 5: Bramalea and Steeles Ownership Map



The following is a general description of primary land uses within the northeast, southeast and southwest quadrants of the intersection of Steeles Avenue East and Bramalea Road:

- Northeast Quadrant: Employment and Industrial uses, including manufacturing and warehousing (including the historic Simmons Warehouse and Office);
- Southeast Quadrant: Employment and Industrial uses, including warehouse, manufacturing and automobile related activities (including the Canadian Tire distribution facility); and
- Southwest Quadrant: Employment and Transit uses, including warehouse and manufacturing, as well as the Bramalea GO Train Station and Bus Terminal.



Figure 6: Aerial Photo – 64 and 70 Bramalea Road

The lands located south of the Canadian National Railway corridor, located within the greater southwest quadrant, are excluded from the Region of Peel’s proposed MTSA boundary, on account of the fact that they are physically separated from the balance of the district.

The proposed introduction of residential uses on the subject lands, and throughout the northwest quadrant and portions of the northeast and southeast quadrants represent an opportunity to accommodate additional medium and high-density residential development, similar to the aforementioned successful Medallion “Compass” residential apartment buildings. The broadening of land uses to include additional residential development is compatible with the existing residential neighbourhood located to the north of the Bramalea GO Station Mixed Use Neighbourhood.

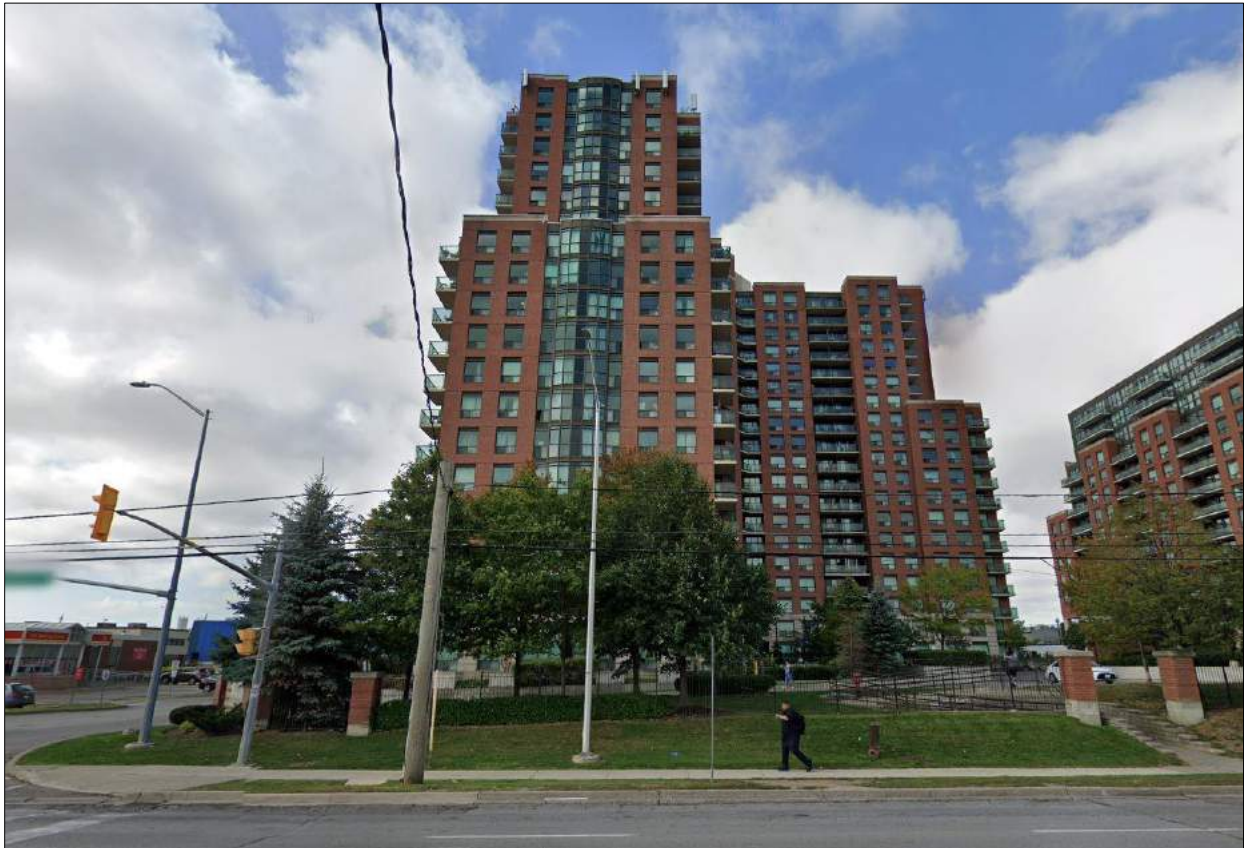


Figure 7: Streetview – 64 Bramalea Road



Figure 8: Streetview – 70 Bramalea Road



3.3 Community Facilities and Amenities

The introduction of additional residential development within the limits of the Bramalea GO Station Mixed Use Neighbourhood will be supported by numerous existing local community facilities and amenities; many of which are located within a 10-minute walk thereof (see **Figure 9**).

3.3.1 Parks and Recreation Centres

The established residential community located north of the Bramalea GO Station Mixed Use Neighbourhood is serviced by numerous parks of varying sizes and recreational facilities; many of which are connected by the Esker Lake, the Chinguacousy and the Don Doan Recreational Trails. Existing Victoria Park fronts onto Avondale Blvd and Victoria Crescent. It is located within the limits of the Bramalea GO Station Mixed Use Neighbourhood. There are opportunities for the City of Brampton pathway network to be integrated with Victoria Park, via the utilization of the existing ravine located alongside Spring Creek, as well as a lineal open space feature which is envisaged to extend throughout the neighbourhood making a connection with Dearbourne Park.

In regards to recreational facilities, there are two (2) existing recreation centres located within the vicinity of the subject lands; including: the Balmoral Recreation Centre and the Earnscliffe Recreation Centre (see **Figure 10**).

3.3.2 James F. McCurry Victoria Park Arena

The subject lands are within close proximity to James F. McCurry Victoria Park Arena (Arena) (previously referenced as Victoria Park) and Avondale Day Care (now renamed BrightPath Avondale Childcare Centre); known municipally as 20 Victoria Crescent and 55 Avondale Boulevard respectively. Combined, the properties measure approximately 9.55 ha; including the Spring Creek and pathways to Birchbank Public School, located to the west of the subject lands. The Arena is comprised of a 3,298 sq. m. two-level single-purpose ice skating facility. The Avondale Day Care Centre consists of approximately 836.13 sq. m. (see **Figures 11 and 12**).

In May 2016, the Arena suffered a major fire causing extensive damage to the facility's structure, forcing the City of Brampton to close the facility. City Staff outlined three (3) options for the Arena in a Recommendation Report to Brampton City Council; including: i) demolishing the fire-damaged structure and constructing a new dry-floor recreation centre; ii) renovation and repurposing of the existing facility with a 464.52 sq. m. addition; or iii) demolishing the Arena and declaring the lands surplus.

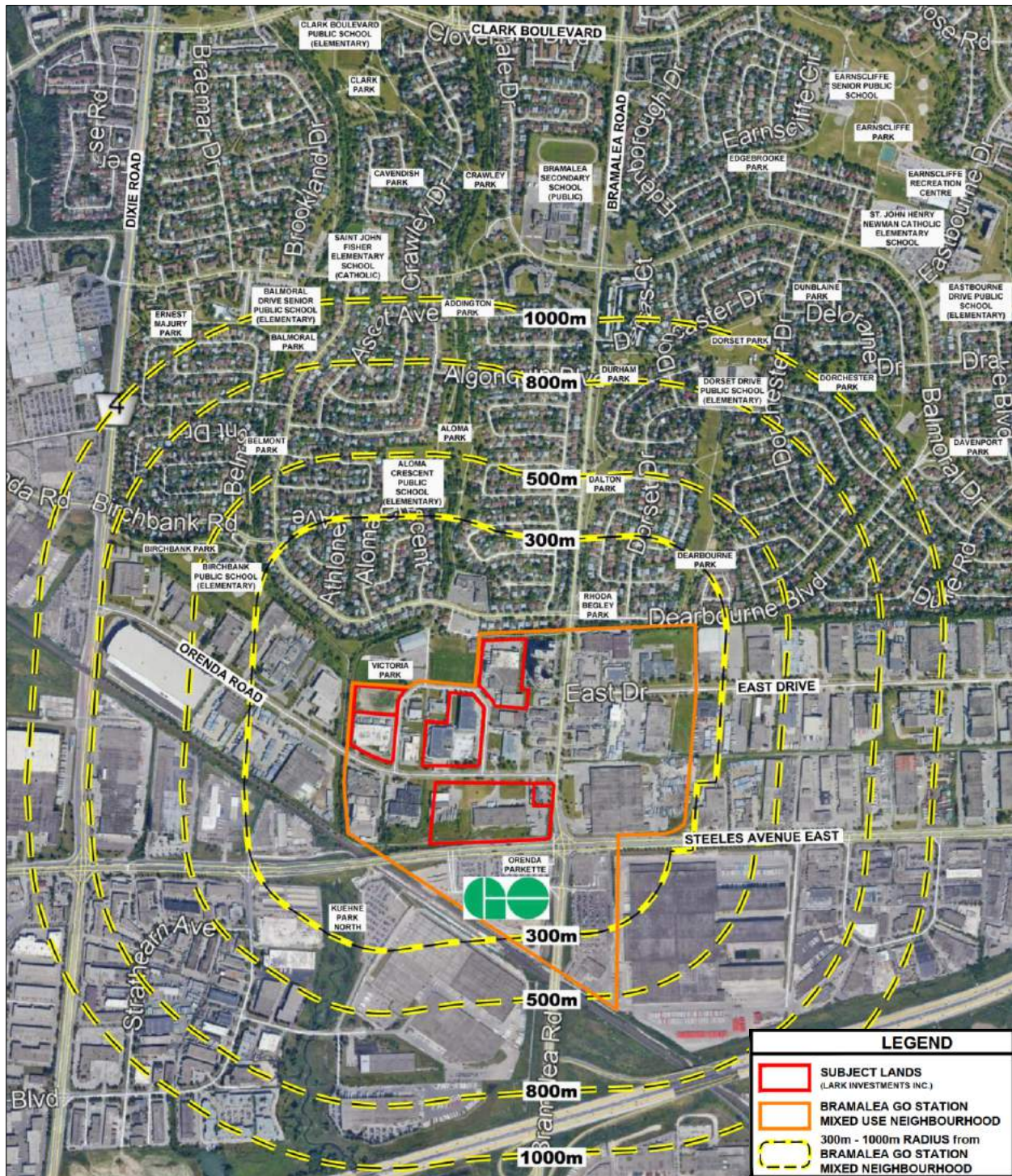


Figure 9: City of Brampton City Facilities, Parks and Schools

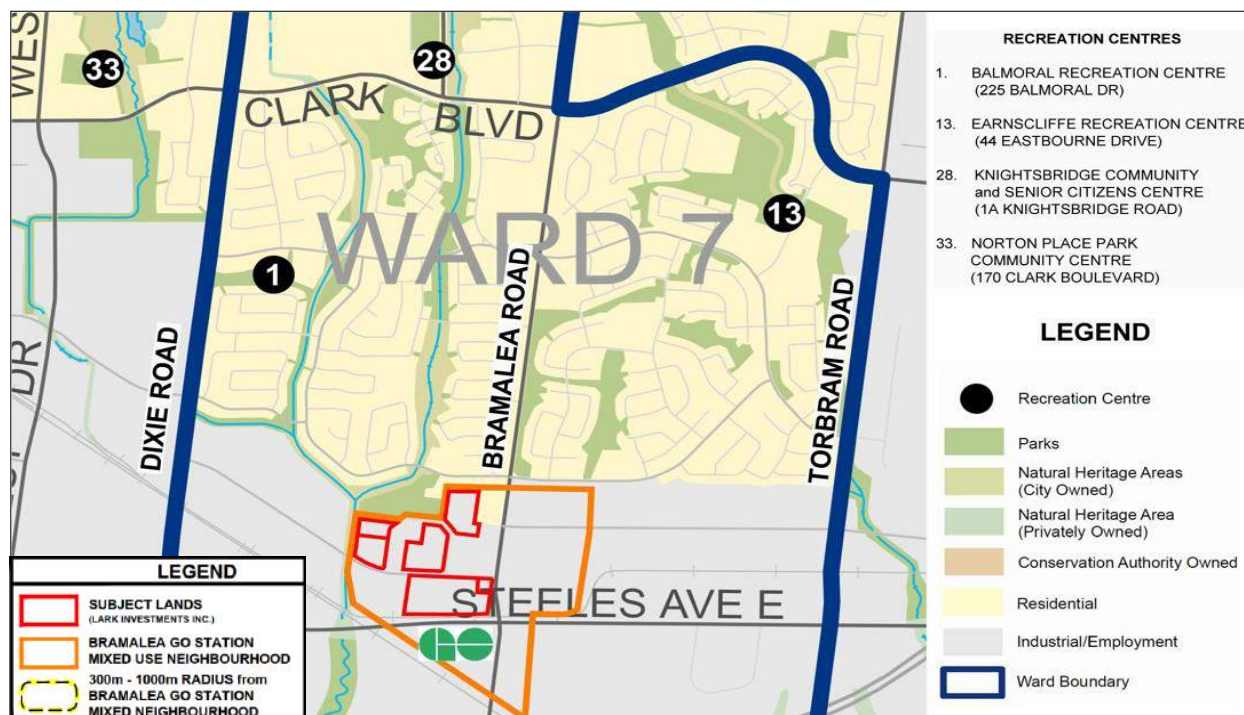


Figure 10: Extract from the City of Brampton Recreation Facilities



Figure 11: Victoria Park from Victoria Crescent



Figure 12: Victoria Park from Avondale Boulevard



On May 29, 2019, City of Brampton Council approved a Staff Recommendation Report, directing City staff to demolish the old Arena (built in 1967) and replace it with a new “dry-floor” recreation centre; subsequently approving a \$17.5 million budget amendment for the potential redevelopment of approximately 4.05 ha. The area for redevelopment includes the existing Victoria Park Arena, Avondale Day Care, the soccer field and parking lots. As stated in the Recommendation Report:

“...overarching push for planning more multi-purpose, multi-generational, and fully inclusive spaces across the City of Brampton, suggests that a dry-floor facility would fit perfectly into the growth plans for Recreation facilities”.

Based on a review of the September 21, 2021 City of Brampton Heritage Board Minutes of Meeting, it is our understanding that the demolition of the existing structures has been completed. In accordance with the recommendations of the Heritage Assessment, the existing glulam beams that did not experience significant fire damage will be incorporated into the design of the ‘new’ structure. **Figures 13 and 14** illustrate the proposed site plan and rendering of the ‘new’ recreation centre.

Brampton staff and the City’s architectural consultant are in the process of finalizing the design of the ‘new’ recreation centre, with construction expected to begin in 2022. The proposed introduction of additional residential uses within the Bramalea GO Station Mixed Use Neighbourhood would be supported by the activities planned to be accommodated within the ‘new’ Victoria Park recreation centre.



Figure 13: Victoria Park Arena Proposed Site Plan



Figure 14: Victoria Park Arena Proposed Rendering – Main Entrance

3.3.3 Schools

The existing residential community located north of the subject lands and the Bramalea GO Station Mixed Use Neighbourhood is well served by existing public elementary, secondary and catholic elementary schools (see **Figure 9**). Within 1.5 kms of the Bramalea GO Station Mixed Use Neighbourhood there are no less than eight (8) public and catholic elementary and secondary schools; including:

- Bramalea Secondary School (Public – Secondary);
- Aloma Crescent Public School (Public – Elementary);
- Balmoral Drive Senior Public School (Public – Elementary);
- Birchbank Public School (Public – Elementary);
- Dorset Drive Public School (Public – Elementary);
- Eastbourne Drive Public School (Public – Elementary);
- St. John Fisher Elementary School (Catholic – Elementary); and
- St. John Henry Newman Elementary School (Catholic – Elementary).

Table 1 summarizes the capacity, enrollment and utilization rates for the abovementioned schools which are managed by the Peel District School Board (PDSB) and the Dufferin-Peel Catholic District School Board (DPCDSB). The data presented in Table 1 have been sourced from the May 2019 Education Development Charges Background Study, prepared by Watson and Associates Economists Ltd. The aforementioned Study did not include data for St. John Henry Newman Elementary Catholic School.

Bramalea Secondary School is the closest public secondary school serving the Bramalea GO Station Mixed Use Neighbourhood. Based on 2018/2019 enrollment data, it has a utilization rate of 84%. Based on 2033/2034 enrollment projections, the utilization rate is projected to decline to 73%. According to the data, the Bramalea Secondary School would have capacity available to serve students generated by the proposed residential development.



School	Capacity	2018/2019 Enrollment	2018/2019 Utilization	2033/2034 Enrollment	2033/2034 Utilization
Peel District School Board					
Bramalea Secondary	1,278	1,070	84%	930	73%
Aloma Crescent Elementary	470	389	83%	393	84%
Balmoral Drive Senior	693	612	88%	600	87%
Birchbank Elementary	413	364	88%	300	73%
Dorset Drive Elementary	432	502	116%	516	119%
Eastbourne Drive Elementary	505	358	71%	285	56%
Dufferin-Peel Catholic District School Board					
St. John Fisher Elementary	403	573	142%	606	150%
Available Pupil Places				887	

Table 1: PDSB and DPCDSB Capacity and Enrollment

The PDSB operates five (5) elementary schools within the area. Based on 2018/2019 enrollment data, the utilization rates for these schools ranges from 71% to 88%; with the exception being Dorset Drive Public School which is operating over capacity with a utilization rate of 116%. It is projected that by the year 2033/2034, the utilization rates of these schools will range from 56% to 87%; excluding Dorset Drive Public School which is expected to continue operating over capacity. We believe that the elementary schools could serve students generated from the proposed redevelopment. With respect to Dorset Drive Public School, it appears to be suffering from chronic overutilization for reasons which have nothing to do with the development proposed within the Bramalea GO Station Mixed Use Neighbourhood.

While there are two (2) Catholic Elementary Schools located within the general vicinity of the Bramalea GO Station Mixed Use Neighbourhood, the aforementioned Study only contains data for the St. John Fisher Elementary School. Based on 2018-2019 enrollment data, the St. John Fisher Elementary School utilization rate is 142%, which is projected to increase to 150% by the year 2033/2034. Similar to the situation associated with the Dorset Drive Public School, it would appear that this school is suffering from chronic overutilization. This is a situation which should be addressed by the DPCDSB; irrespective of the proposal to introduce additional residential units within the Bramalea GO Station Mixed Use Neighbourhood.

3.3.3.1 Pupil Yield

The proposed Bramalea GO Station Mixed Use Neighbourhood is estimated to include in excess of 6,427 residential units; with potentially even more with the build-out of the lands located east of Bramalea and south of Steeles Avenue East. Not all of these units will be built-out by the projected 2033/2034 enrollment date. In addition, not all of the students generated by the proposed residential development will attend PDSB and DPCDSB schools.

For the purposes of estimating whether or not the existing schools would be able to accommodate students generated by the proposed residential units, assumptions have been made using the existing and projected enrollment and utilization rates from Table 1. Based on preliminary calculations, approximately 965 public elementary and 193 secondary school students would be generated by the proposed residential units. In addition, approximately 386 catholic elementary



and 193 secondary school students would be generated by the proposed residential units (see **Table 2**).

It would appear that there will sufficient capacity available within existing public elementary and secondary schools to accommodate students. With respect to the students who may attend catholic elementary and secondary schools, until such time as data is made available in connection with the St. John Henry Newman Elementary School, it is not possible to opine on whether or not sufficient capacity in existing schools will be available.

	Bramalea GO Station Mixed Use Neighbourhood	Subject Land
PDSB – Pupil Yield of Proposed Redevelopment		
Elementary	965 (based on a pupil yield factor of 0.15 pupils/unit)	570 (based on a pupil yield factor of 0.15 pupils/unit)
Secondary	193 (based on a pupil yield factor of 0.03 pupils/unit)	114 (based on a pupil yield factor of 0.03 pupils/unit)
Total (approx.)	1,158	684
DPCDSB – Pupil Yield of Proposed Redevelopment		
Elementary	386 (based on a pupil yield factor of 0.06 pupils/unit)	228 (based on a pupil yield factor of 0.06 pupils/unit)
Secondary	193 (based on a pupil yield factor of 0.03 pupils/unit)	114 (based on a pupil yield factor of 0.03 pupils/unit)
Total (approx.)	579	342

Table 2: Pupil Yield of Proposed Redevelopment

3.3.4 Retail/Commercial

The Avondale Shopping Centre (see **Figure 15**) is located on the north side of Avondale Boulevard, west of the intersection of Bramalea Road and Avondale Blvd/Dearbourne Blvd. It was the first retail plaza built in the Bramalea community when the area was first developed over 50 years ago. The plaza has a mix of uses including:

- Shoppers Drug Mart;
- Pizza Pizza;
- Dollarama;
- Avondale Cleaners;
- Roosters Restaurant;
- Avondale Dental;
- Avondale Barber Shop;
- Suzy Q's Salon;
- Mom's Convenience;
- Right Time Rehab; and
- Caribbean Jerk Pit Restaurant.

In addition to the Avondale Shopping Centre, residents in the area are served by the Bramalea Lions Hall, which is located on the south side of Avondale Boulevard, across the street from the



plaza, and adjacent to the Victoria Park Arena Recreation Centre and fields. The Bramalea Lions Hall hosts banquets and other community functions (see **Figure 16**).



Figure 15: Avondale Plaza



Figure 16: Bramalea Lions Hall

3.4 Bramalea GO Station

The Bramalea GO Station Mixed Use Neighbourhood is located immediately across the street from the Bramalea GO Station, which is located at the southwest corner of the intersection of Bramalea Road and Steeles Avenue East. The Bramalea GO Station is located along the Kitchener GO Corridor; providing transit service between Kitchener and Toronto Union Station (see **Figure 17**). The Bramalea GO Station and the Bramalea GO Station Mixed Use Neighbourhood are part of the Bramalea GO MTSA.

The Toronto-Waterloo Innovation (Economic) Corridor has been identified as an emerging technology cluster. Between 2011 and 2016, the number of technology related jobs provided by businesses and government institutions operating within the economic corridor increased¹. The Bramalea GO Station is identified as being the only GO Transit Station to have Regional Express Rail (RER) service in Brampton, and in this regard, the Bramalea GO Station is viewed as an

¹ Kitchener GO Rail Service Expansion Initial Business Case Update, November 2019



important connection for the City of Brampton. Metrolinx is working with partners in the Region of Peel and the City of Brampton to ensure that the Bramalea GO Station is a convenient, well planned and efficient transit hub station.

Metrolinx is currently improving and expanding the Kitchener GO Corridor to accommodate two-way, all-day service to the City of Kitchener. In order to provide two-way, all-day service, major improvements are being undertaken at the Bramalea GO Station with a view to providing access to more frequent GO service and better station amenities; including, but not limited to:

- Expansion of the platforms to accommodate 12-car trains;
- A new station building;
- A new parking garage (1,300 parking spaces);
- Bicycle storage facilities;
- New passenger pick-up and drop-off areas;
- New retail space; and,
- Enhanced safety features.

Improvements to the Bramalea GO Station also includes upgrading the access to the station from Bramalea Road and improved bus platforms for GO Transit, Brampton Transit (including a dedicated Züm Bus loop), as well as enhanced accessibility and community connections. To-date, the interior work on the new station building is underway and a new a parking garage has been built (see **Figures 18a and 18b**).

In addition, the Bramalea GO Station is accessible by public transit; including the following Brampton Transit and GO Transit routes:

- To Bramalea GO Station:
 - 13 Avondale (Brampton Transit);
 - 15/15A Bramalea (Brampton Transit);
 - 16 Southgate (Brampton Transit);
 - 92 Bramalea GO (Brampton Transit); and
 - 30 – Kitchener –Bramalea GO (GO Transit).
- Connection services to direct bus routes:
 - 14 Torbram (Brampton Transit);
 - 18/B Dixie (Brampton Transit);
 - 115 Airport Express (Brampton Transit);
 - 185 Dixie Express (Brampton Transit); and
 - 511/511A/511C Züm (Brampton Züm BRT).

The location of the Bramalea GO Station Mixed Use Neighbourhood and the proposed transit-supportive densities are supported by existing and planned public transit and infrastructure.

The subject lands are an ideal location for residential mixed-use development. The Bramalea GO Station is located in the middle of an economic corridor which is providing employment opportunities, drawn from a large local talent pool. The Province of Ontario's past and present



investments in public transit, have and will enhance efficient transit service at the Bramalea GO Station, and along the Kitchener GO Corridor, acting as a catalyst for redevelopment and intensification within the MTSA.

3.5 Torbram Industrial Lead East Spur Line

The Torbram Industrial Lead East Spur Line (Lead Spur Line) is approximately 5 km long, connecting to the Canadian National Rail (CN) Halton Subdivision mainline. There are five (5) smaller rail spur lines which connect off the Lead Spur Line serving various businesses² located in the Bramalea industrial area. The Lead Spur Line is located on the north side of Steeles Avenue East, running parallel to Steeles Avenue East, along the southern limits of 387 and 391 Orenda Road (see **Figure 19**). Based on recent correspondence received from CN, the rail spur line is used sporadically on an unscheduled basis. At present, CN has no plans to decommission or close the Lead Spur Line.

3.5.1 Planning for the Torbram Industrial Lead East Spur Line

Generally speaking, the existence of a rail spur line can limit opportunities for redevelopment. The *Lark* vision for the Bramalea GO Station Mixed Use Neighbourhood has considered the location of the existing rail spur line, and the impact it could have on the redevelopment of their lands located in the immediate vicinity of Steeles Avenue East.

Lark retained Stantec Consulting Ltd. (Stantec) to prepare a preliminary feasibility study in support of an at-grade road crossing of the Lead Spur Line. The objective was to determine if it would be feasible to cross the Lead Spur Line opposite the existing vehicular access to the Bramalea GO Station. Stantec concluded that the proposed road crossing of the Lead Spur Line is feasible and that it could be designed to comply with Federal Grade Crossing Standards and Regulations. They are conducting further analysis from a railway design perspective. A road connection to Steeles Avenue East would provide enhanced and direct access to the Bramalea GO Station from the Bramalea GO Station Mixed Use Neighbourhood.



Figure 17: Metrolinx Kitchener Line GO Train Map

² Bramalea Mobility Hub Land Use Study, prepared by Perkins + Will, January 2019

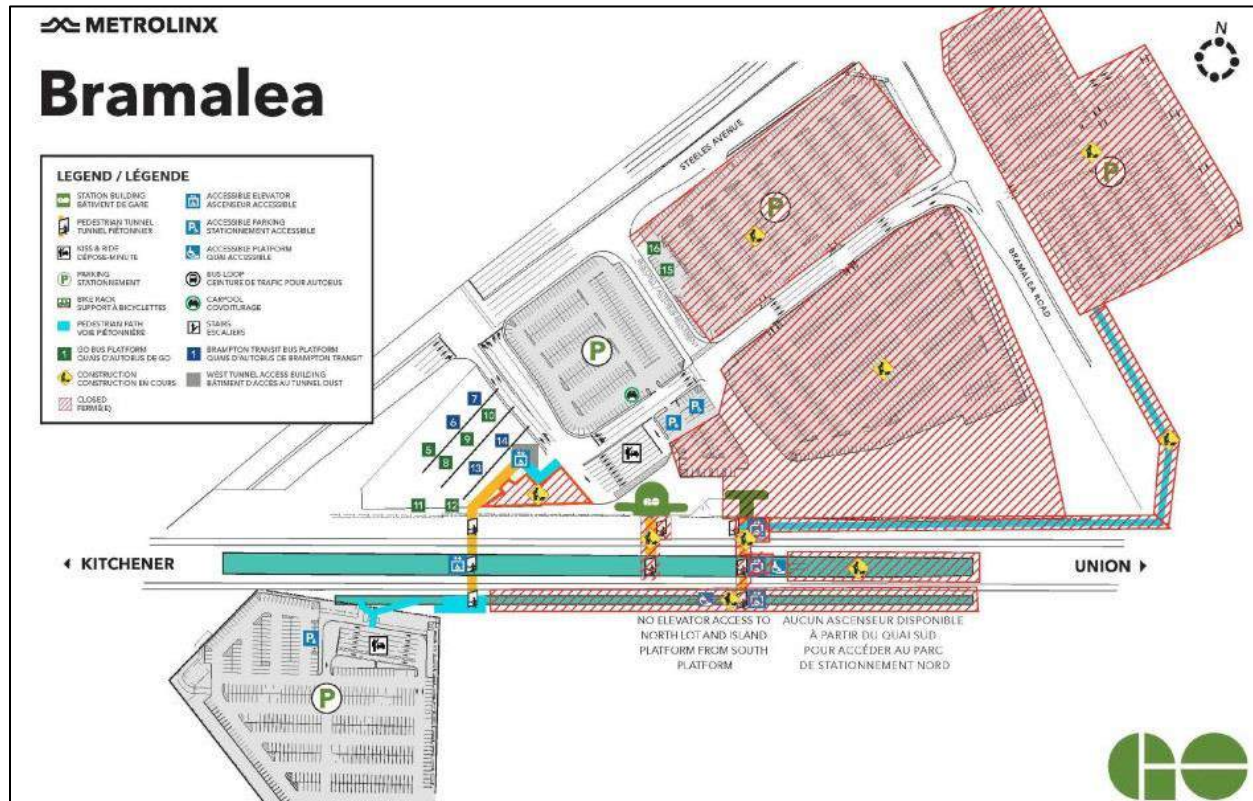


Figure 18a: Bramalea Go Station Redevelopment Concept Plan



Figure 18b: Bramalea Go Station Redevelopment Rendering

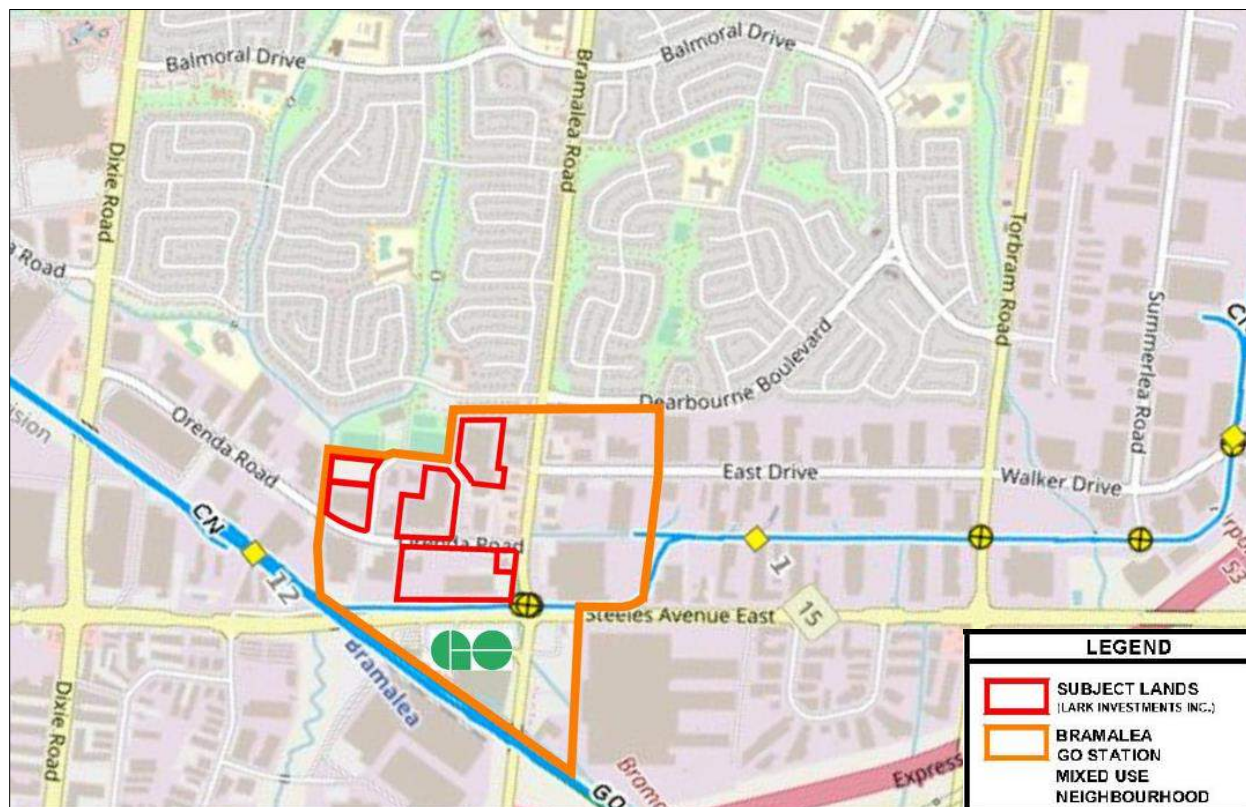


Figure 19: Torbram Industrial Lead Spur Line Mapping Railway Association of Canada Canadian Rail Atlas

4.0 EMPLOYMENT CONVERSION

In order to consider the *Lark* vision for the Bramalea GO Station Mixed Use Neighbourhood it is necessary to consider the issue of employment conversion. In this respect, in December 2012, the City of Brampton Planning Department initiated a review of the 2006 City of Brampton Official Plan. As part of that review, in a March 10, 2016 Staff Recommendation Report³, they considered twelve (12) employment conversion requests, as well as one (1) identified by City staff.

According to the Staff Recommendation Report, five (5) of the twelve (12) employment conversion requests were supported on the basis that the proposals were:

- Located adjacent to lands designated for residential purposes;
- Deemed compatible from a land use perspective;
- Functionally related to the adjacent residential neighbourhood(s);
- Able to utilize existing natural boundaries to separate the proposed residential and mixed-use areas from adjacent employment lands;

³ Recommendation Report – City of Brampton Municipal Comprehensive Review (MCR), dated March 10, 2016



- Able to demonstrate that the potential existed to create an equal or greater number of jobs, on smaller sites designated ‘employment’ or ‘mixed-use’ provided that they are developed at higher densities, utilizing more urban built forms;
- Situated such that they had greater exposure and accessibility to higher order transit;
- Not going to compromise the ability of lands in the immediate area to accommodate higher order employment uses; and
- Not going to affect the overall viability of the area to accommodate appropriate and compatible employment uses.

4.1 69 Bramalea Road

In addition to the aforementioned employment conversions, the City of Brampton also considered a separate request for an employment conversion at 69 Bramalea Road; a property located within the Bramalea GO Station Mobility Hub, across the street from the Medallion ‘Compass’ residential apartment buildings. The property is located at the northeast corner of East Drive and Bramalea Road. At present it is occupied by an older multi-unit retail and office building. The proposed re-development of 69 Bramalea Road consists of a 21-storey mixed-use building containing 408 residential units, and at grade retail (see **Figure 20**).

City staff evaluated the employment conversion request based on the draft ‘Emerging Concept’ for the Bramalea GO Mobility Hub (see **Figure 21**). The City of Brampton Staff Report (May 1, 2017) introduced the ‘Emerging Concept’, and concluded that the area around the Bramalea GO Station offers a great opportunity for redevelopment to higher order uses. City Staff made a point of stating that the existing older low-density industrial buildings located in the area had become obsolete.

The draft ‘Emerging Concept’ supports the re-designation of lands in this area, accommodating a broad range of land uses, including residential, retail, mixed-use and offices on both sides of Bramalea Road, north of Steeles Avenue East. Offices are largely concentrated at the intersection of Steeles Avenue East and Bramalea Road, as well as adjacent to Highway 407.

Ultimately, City staff supported the conversion of 69 Bramalea Road, permitting high-density residential with at-grade retail. City staff supported the employment conversion on the basis that:

“...the area adjacent to the Bramalea GO station is envisioned as an employment and mixed-use node that will function as an urban gateway into the City from the south, providing redevelopment opportunities for higher order uses...The extent to which residential uses should be permitted directly adjacent to 69 Bramalea Road is proposed to be reviewed as part of a scoped MCR in order to provide the appropriate context for the redevelopment of the immediate area for higher density residential and mixed uses.”

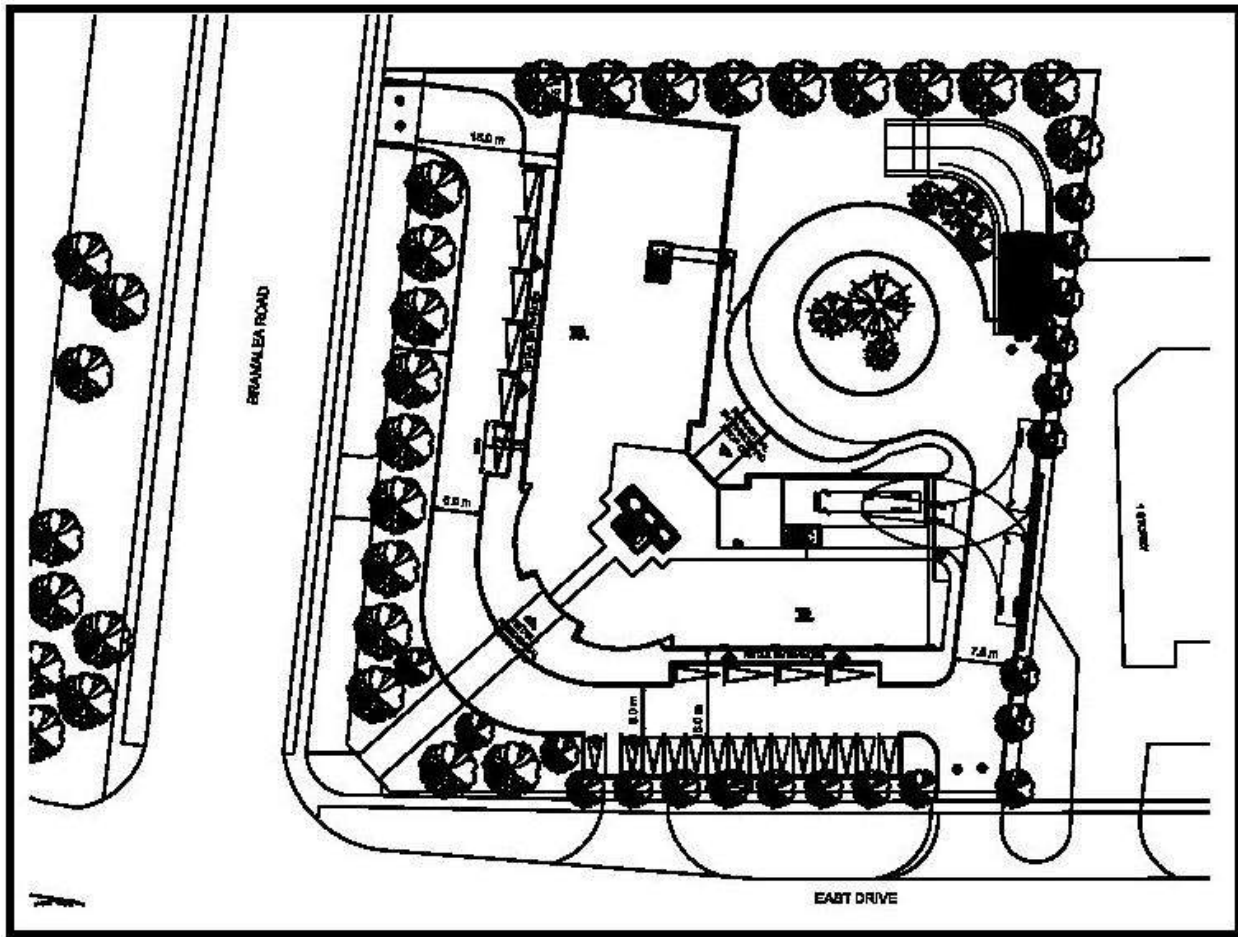


Figure 20: Proposed Development Plan – 69 Bramalea Road

The *Lark* proposal for the re-designation and conversion of employment lands located immediately north of the Bramalea GO Station, shares the same locational and contextual attributes as 69 Bramalea Road. The lands located within the Bramalea GO Station Mixed Use Neighbourhood and the Bramalea GO MTSA, will contribute to the revitalization of what is appropriately described as an area of older low-density industrial buildings, many of which have become obsolete. Encouraging the development of modern residential mixed-use buildings, containing a combination of residential, retail and office commercial uses will in the fullness of time result in the development of a greater number of higher order jobs and the maximization and optimization of transit infrastructure, while accommodating a significant number of residential units.



7.13 - 33

BRAMALEA GO MOBILITY HUB CHARACTER AREAS



Figure 21: Bramalea GO Mobility Hub Character Areas

12



5.0 VISION for “EMERALD HEIGHTS”

In response to the opportunities presented within the Bramalea GO Station Mixed Use Neighbourhood, associated with the Bramalea GO MTSA, working with Bousfields Inc., Lark and the project team have developed a *Vision* for “*Emerald Heights*”. *Emerald Heights* represents an opportunity to develop a mixed-use residential, retail and office commercial complete community, which will have immediate access to existing and planned community services and facilities as well as superior transportation and transit infrastructure. Central to the *Vision* is a grand landscaped promenade (*Emerald Heights Boulevard*) public street connecting the Bramalea GO Station and Steeles Avenue East north to Orenda Road and beyond to Victoria Park (see **Figures 1, 2, and 22 through 28**). The following is a brief statistical summary of the Bramalea GO Station Mixed Use Neighbourhood Concept Plan for *Emerald Heights*:

- Gross Area: 29.46 ha
- Bramalea GO Station Mixed Use Area:
 - Residential Units: 6,427
 - Residential Gross Floor Area (GFA): 644,755 sq. m.
 - Non-Residential GFA: 39,044 sq. m.
- Residential Units on the Subject Lands:
 - Residential Units: 3,800
 - Residential Gross Floor Area (GFA): 376,228 sq. m.
 - Non-Residential GFA: 25,730 sq. m.
- Gross Floor Space Index: 2.09
- Building Heights: 4 – 35 storeys

In addition to the *Emerald Heights Boulevard*, the proposal contemplates a number of road network improvements; including an important proposed east-west road connection from East Drive to Victoria Crescent. The road network improvements will be part of a larger circulation network which will include numerous existing and proposed pedestrian connections which will be integrated into the road network, as well as multiple mid-block connections. The *Vision* for *Emerald Heights* includes a robust lineal ‘green linkage’ located along the north side of Steeles Avenue East, running parallel thereto, connecting northward to Victoria Park, adjacent to Spring Creek. It is also proposed that the ‘green linkage’ extend east of Bramalea Road, and northward connecting to Dearbourne Park (see **Figures 1, 2, and 22 through 28**).

Altus Group anticipates that at full build-out, *Emerald Heights* will accommodate in excess of approximately 12,469 residents (of which 7,372 will be accommodated on the subject lands alone) as well as approximately 1,237 jobs (of which 840 will be accommodated on the subject lands alone). Combined, there will be approximately 13,706 residents and jobs (of which a combined 8,212 residents and jobs will be accommodated on the subject lands) within the Bramalea GO Station Mixed Use Neighbourhood. The aforementioned figures do not incorporate the residents and jobs from the Medallion ‘Compass’ residential apartment building, or the proposed



development of 69 Bramalea Road (see **Figures 1, 2, and 22 through 28**). If we were to include the proposal for 69 Bramalea Road, and the existing Medallion ‘Compass’ residential apartment building, the total existing and proposed residential units for the neighbourhood is 7,449, accommodating approximately 14,451 residents and 1,300 jobs.



Figure 22: Proposed Land Use Structure



Figure 23: Proposed Built Form Structure

BOUSFIELDS INC.



Figure 24: Proposed Pedestrian Connections

BOUSFIELDS INC.



Proposed Concept Plan |

376, 387, 390 + 391 Orenda Road
10 + 26 Victoria Crescent
24 Bramalea Road
Brampton, ON

LEGEND

- Preliminary MTSA Boundary
- Proposed Residential/Mixed Use Neighbourhood
- # Potential Building Heights (Storeys)
- Potential Open Space

BOUSFIELDS INC.

Figure 25: Proposed Concept Plan



Block Statistics

Site Statistics	
Gross Site Area	284,666 sq. m.
Gross PD	2.88
Built Form Statistics	
Block 1	Total GCA
	Residential
	Office
	Residential
Block 2	Total GCA
	Residential
	Office
	Residential
Block 3	Total GCA
	Residential
	Office
	Residential
Block 4	Total GCA
	Residential
	Office
	Residential
Block 5	Total GCA
	Residential
	Office
	Residential
Block 6	Total GCA
	Residential
	Office
	Residential
Block 7	Total GCA
	Residential
	Office
	Residential
Block 8	Total GCA
	Residential
	Office
	Residential
Total Built Form Area	
Total GCA	
Residential	
Office	
Residential	
Total GCA	
Residential	
Office	
Residential	

Assumptions: 50% of GCA, Average Unit Size = 90 sq.m.; Some ground floor retail assumed along Steeles Avenue, Bramalea Road and Orenda Road (55-50% of footprint); Ground floor Office assumed along Bramalea Road and Block 1 building facing Steeles Avenue.

BOUSFIELDS INC.

Figure 26: Proposed Massing Concept – Block Statistics



Site Statistics

Site Statistics	
Gross Site Area	284,866 sq. m.
Gross FDI	2.89

Built Form Statistics	
24 Bramalea Road	Total GCA 26,792 Residential 1,904 Office 22,944 Total GFA 24,113 Residential 1,714 Office 22,399 Residential Units 229
387 Orenda Road + 391 Orenda Road	Total GCA 215,886 Residential 11,144 Office 5,174 Residential 16,363 Total GFA 194,287 Residential 10,034 Office 17,478 Residential Units 175,485
390 Orenda Road	Total GCA 77,878 Residential 1,018 Office 17,850 Total GFA 70,990 Residential 68,173 Residential Units 765
10 Victoria Crescent + 278 Orenda Road	Total GCA 40,862 Residential 40,862 Total GFA 36,776 Residential 36,776 Residential Units 406
26 Victoria Crescent	Total GCA 48,840 Residential 48,840 Total GFA 36,486 Residential 36,486 Residential Units 403
Total Built Form Area	Total GCA 401,958 Residential 16,972 Office 10,865 Residential 376,225 Total GFA 361,763 Residential 13,565 Office 9,502 Residential Units 3,800

Assumptions: GFA 90% of GCA; Average LRI Size = 50 sq.m.; Some ground floor retail assumed along Steeles Avenue, Bramalea Road and Orenda Road (20-50% of footprint); Second floor office assumed along Bramalea Road and Orenda Road (50-75% of footprint).

BOUSFIELDS INC.

Figure 27: Proposed Massing Concept – Site Statistics



Proposed Concept Plan - Land Use |

376, 387, 390 + 391 Orenda Road
10 + 26 Victoria Crescent
24 Bramalea Road
Brampton, ON

LEGEND

- Preliminary MTSA Boundary
- Proposed Residential/Mixed Use Neighbourhood
- Subject Sites
- Mixed Use
- Residential
- Active Development Application
- # Potential Building Heights (Storeys)
- Potential Open Space
- Existing Naturalized Area
- Proposed Trail

BOUSFIELDS INC.

Figure 28: Proposed Concept Plan – Land Use



The Bramalea GO Station Mixed Use Neighbourhood is approximately 29.5 ha; concentrated along Steeles Avenue East and Bramalea Road, extending north and west toward Victoria Park and Spring Creek. Applying the Growth Plan density target of 150 people and jobs per hectare (“ppj/ha”), at build-out the neighbourhood could accommodate approximately 4,425 ppj/ha. The *Lark* vision for the neighbourhood would accommodate a significantly greater number of people and jobs per hectare than the minimum prescribed density target of the Growth Plan.

The addition of residential land use permissions within the northwest quadrant of Bramalea Road and Steeles Avenue East will assist the Region of Peel and the City of Brampton in achieving 2051 population and employment targets, within an area immediately adjacent to the Bramalea GO Station and a plethora of existing and proposed community services and facilities. The existing Medallion ‘Compass’ residential apartment building and the recently approved mixed-use residential and retail and office commercial building at 69 Bramalea Road serve as precedents for residential uses in this area of the City of Brampton.

Similar to other locations in the Greater Toronto and Hamilton Area, including, but not limited to downtown Toronto and the Vaughan Metropolitan Centre, *Emerald Heights* represents an exciting mixed-use master plan including a broad range of residential, retail and office commercial, personal service land uses within a walkable urban setting, anchored by the Bramalea GO Station and numerous existing and proposed community services and facilities. *Emerald Heights* will optimize and maximize past, present and future public and private sector investments in infrastructure (i.e., GO Transit, rapid bus transit, light rail transit and emerging planning framework).

The proposal represents an opportunity to transform an area characterized by older low-density industrial buildings (many of which are obsolete) into a progressive and dynamic modern mixed-use residential and employment neighbourhood serviced by higher order transit and numerous existing and proposed community services and facilities. It is envisaged that the intersection of Steeles Avenue East and Bramalea Road, anchored by the Bramalea GO Station will serve as a gateway and activity node for the whole of the neighbourhood. The intersections of Bramalea Road and Avondale Boulevard/Dearbourne Boulevard, Orenda Road and the Spring Creek, Steeles Avenue East and the CN Rail, as well as at Steeles Avenue East in the vicinity of *Emerald Heights Boulevard*, shall act as additional gateways into the neighbourhood and the greater Bramalea GO MTSA (see **Figure 23**).

From a massing and land use perspective, it is envisaged that buildings will range in height from 4 stories to 35 stories; with the tallest buildings located along Steeles Avenue East, Bramalea Road and Orenda Road. The buildings located along the aforementioned streets are envisaged to be developed as mixed-use residential and commercial structures. The shorter multi-unit residential apartment buildings are located on the north side of Orenda Road and west of Bramalea Road, oriented toward Victoria Park (see **Figure 25**).

Buildings will be sited to contribute to pedestrian-oriented streets and laneways. The *Emerald Heights Boulevard* is proposed to connect the Bramalea GO Station and Steeles Avenue East through the community to Orenda Road and beyond to Victoria Park. The road and pedestrian network is predicated on a traditional urban grid, which will facilitate the penetration of lots and blocks, thereby animating rights-of-way and encouraging a vibrant at-grade public realm. The



proposed arrangement of buildings facilitates opportunities for the creation on each block of sheltered, private and intimate courtyards and amenity spaces for the enjoyment of residents and employees alike (see **Figures 24 and 25**).

The *Vision for Emerald Heights* is exciting and dynamic. It represents an opportunity to re-develop an older low-density industrial precinct into a fully integrated community, focused on re-urbanizing streets so that they become pedestrian-oriented places. The proposal from a land use and density perspective is transit-supportive and one which maximizes and optimizes the use of existing and proposed infrastructure, and community services and facilities. The proposal advances a significant amount of housing and employment uses which are compatible with existing and emerging land uses.

6.0 REGION of PEEL and CITY of BRAMPTON **OFFICIAL PLAN REVIEWS/MUNICIPAL COMPREHENSIVE REVIEW**

The Peel 2041 Official Plan Review exercise (rebranded as “Peel 2041+ Official Plan Review” and again recently as “Peel 2051”) represents the Region of Peel’s Official Plan Review/Municipal Comprehensive Review (“MCR”) exercise to establish conformity with the recent policy updates to Provincial Plans; including, the 2020 Provincial Policy Statement and 2020 Growth Plan for the Greater Golden Horseshoe (Growth Plan). The Peel 2051 Official Plan Review conformity exercise and MCR includes, but is not limited to, the delineation of Priority MTSA’s, minimum densities for strategic growth areas (including MTSA’s), and population/employment growth allocations.

In 2019, the Region of Peel commenced the MTSA Focus Area Review as part of the Peel 2051 Official Plan Review to examine MTSA’s across the Region. In this regard, “Draft MTSA Profiles” have been advanced in the Region of Peel’s April and May 2020 Direction Reports. The Draft MTSA Profiles for each MTSA within the Region identifies an 800-metre radius from an identified transit station or stop (per the definition of an MTSA in the Growth Plan), as well as a more refined “Preliminary Boundary Delineation” that is reported to be based on a consideration of the Region’s identification of local opportunities and constraints, as well as other planning considerations.

On December 10, 2020, Regional Council considered a Staff Report from Regional Public Works and Planning Staff that provided a status update on the Peel 2051 Official Plan Review/MCR. The Regional Staff Report recommended that the “*Peel 2041+ Official Plan Review*” public consultation period continue into 2021 with the objective of Regional Council’s adoption of a final Regional Official Plan Amendment (“ROPA”) by the end of 2021, and prior to the Provincial conformity deadline of July 1, 2022. The December 10, 2020 Regional Staff Report also included a draft ROPA that advanced a preliminary policy framework for the Region’s MTSA’s.

The *Lark Emerald Heights* proposal is being advanced in the context of the following Staff Reports; all of which are related to the Region of Peel’s MTSA’s:

- April 2020 Region of Peel Phase 1A: Preliminary MTSA Review Report (April 2020 Report) and May 2020 Region of Peel Policy Direction Report;



- December 10, 2020 Regional Staff Report (including the draft MTSA ROPA attached as Appendix III to the December 10, 2020 Staff Report); and
- December 2020 Region of Peel Phase 1B Report.

6.1 April 2020 and May 2020 Region of Peel MTSA Focus Area Review - Bramalea GO MTSA #12

The Bramalea GO Station Mixed Use Neighbourhood is located within 800 m of the existing Bramalea GO Station which serves the Kitchener GO Corridor, with local and inter-/intra-regional bus service connections; including, the City of Brampton Züm Bus Rapid Transit Corridor. By Growth Plan definition, the Bramalea GO Station Mixed Use Neighbourhood is located within an MTSA. The Bramalea GO Station has been identified as a Growth Plan Priority Transit Corridor and MTSA #12 in the Region of Peel's MTSA Focus Area Review. The Region of Peel's Bramalea GO Draft MTSA Profile, as contained in the April 2020 Report and May 2020 Policy Directions Reports, is enclosed in **Figure 29**.

The April 2020 Report states that:

“The Bramalea GO MTSA is a unique MTSA that requires further review in response to recent and proposed infrastructure investments and upcoming planning work (Secondary Plan update) that may shift scoring in certain lens”.

The Bramalea GO Station is a unique facility. It is recommended that the Region of Peel should consider a tailored approach to broadening the variety of land uses permitted within the Bramalea GO Station Mixed Use Neighbourhood. The inclusion of residential would further advance the Province's vision for directing growth through efficient and effective land use patterns that are transit-supportive. The introduction of residential land uses within the northwest quadrant of Steeles Avenue East and Bramalea Road, as well as along the east and west sides of Bramalea Road and the north and south sides of Steeles Avenue East would contribute to the creation of a unique and diverse complete community. Toward this end, we are of the opinion that the role and function of the Bramalea GO MTSA requires superior design, consciously driven connectivity, public realm amenities, and a mix of land uses, all at transit-supportive densities.

We recognize and acknowledge that the Region of Peel has conducted their analysis based on existing Station conditions. The following are our observations, comments and concerns regarding the Region of Peel's Bramalea GO Draft MTSA Profile (as outlined in the Region of Peel April 2020 and May 2020 Reports):

- Subject Lands Status within MTSA:
 - Growth Plan 800 metre MTSA Radius: The subject lands are located within 800 m of the Bramalea GO Station;
 - Region of Peel Draft MTSA Preliminary Boundary Delineation: The subject lands are located within the Bramalea GO Draft MTSA Preliminary Boundary;



- Bramalea GO MTSA Target Density: 150 ppj/ha.
- Existing MTSA Density:
 - Growth Plan 800 metre MTSA Radius: 17.7 ppj/ha (the existing density is a mere fraction of the Bramalea GO MTSA Density target of 150 ppj/ha); and
 - Region of Peel Draft MTSA Preliminary Boundary Delineation: 13.9 ppj/ha (the existing density is a mere fraction of the Bramalea GO MTSA Density target of 150 ppj/ha)
- Additional People and Jobs Required to Achieve Target Density: 15,400.
- Analytical Lens: Draft MTSA Profile description identified as having “limited potential” (we do not agree with the identification of the area as having “limited potential”).
- Market and Growth Potential: Draft MTSA Profile description identifies “low current development activity, limited vacant land and small parcel size” (*Lark* has assembled six (6) parcels of land with a total area of 15.04 ha, having almost limitless re-development potential – see **Figure 3**).
- Community Consideration: Draft MTSA Profile description identifies “lack of community amenities and benefit from public realm improvements” (We do not agree with the characterization of the community as lacking amenities. The neighbourhood has direct and immediate access to the existing Bramalea GO Station, as well as numerous existing and proposed community services and facilities, many of which are located within 800 m of the limits of the neighbourhood – see **Figure 9**).

As identified in the Bramalea GO Draft MTSA Profile and highlighted above, the Bramalea GO MTSA is planned to achieve a minimum density target of 150 ppj/ha, however the Region of Peel’s MTSA Preliminary Boundary Delineation currently identifies densities for the lands within an 800 metre MTSA radius that are well below the Provincial MTSA density target. It is anticipated by the Region of Peel that an additional 15,400 persons and/or jobs would be required within the Bramalea GO MTSA to achieve the minimum density target. The *Emerald Heights Vision* would contribute in excess of 13,706 persons and jobs, in support of the Provincial MTSA density target.

Notwithstanding the Region of Peel’s assertion that there is limited potential and vacant land within the MTSA boundary, it is our opinion that the Preliminary Boundary Delineation fails to recognize the existing transit supportive development and significant intensification/redevelopment opportunities that exist for those lands located within the Bramalea GO Station Mixed Use Neighbourhood; including, the Medallion ‘Compass’ residential apartment buildings and the proposed mixed-use residential and retail and office commercial apartment building at 69 Bramalea Road.

The Region of Peel’s assertion that the Bramalea GO Station MTSA lacks community amenities is an oversimplification and mis-representation of what exists and what can be accommodated



through the re-development of the area. As discussed within Section 3 of this PJR, the neighbourhood is served by numerous existing and planned community services and facilities.

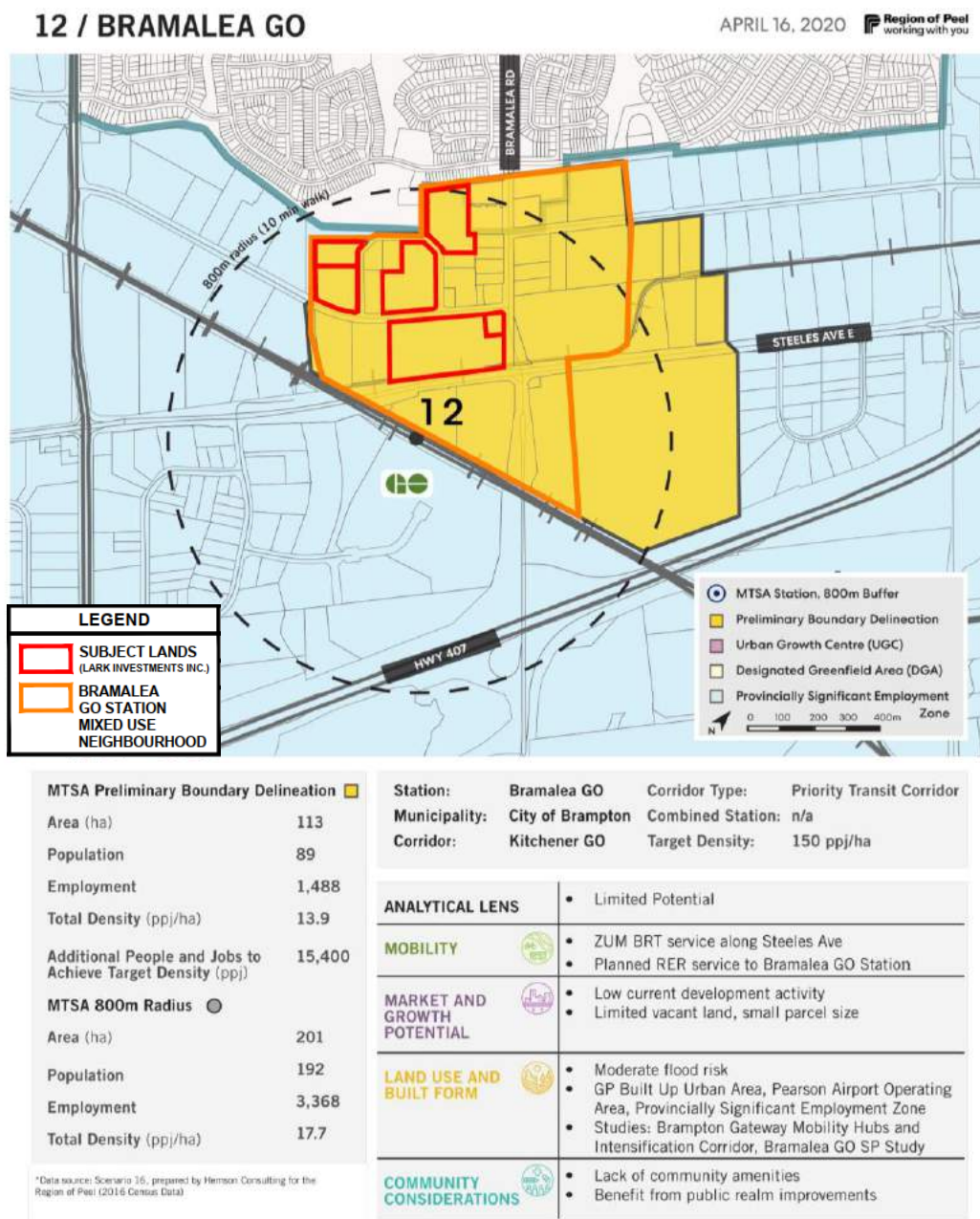


Figure 29: Region of Peel MTSA Profile 12/ Bramalea GO April 2020

The Bramalea GO Station Mixed Use Neighbourhood is located within 800 m of the Bramalea GO Station. The road network includes frontages along major arterial and collector roads, providing convenient access to the Züm BRT service specifically along Steeles Avenue East. The lands are of sufficient size to accommodate significant transit-oriented, mixed-use development which would contribute to meeting Provincial density and growth projections. The *Emerald Heights* vision merits the Region of Peel's consideration for the introduction of a broader range of land



uses, which would provide an opportunity for more intense development within the MTSA which would could contribute to alleviating the existing and projected density shortfall.

6.1.1 Bramalea GO Draft MTSA Profile, December 2020

The Region of Peel December 2020 Phase 1B Report establishes Regional and local municipal priorities as they relate to: regional planning and investment, density targets, land use and built form, and community services and facilities. The aforementioned Report characterizes the Bramalea GO MTSA as a Primary Station. Primary Stations are defined as:

“Areas delineated in this plan that have existing or planned transit supportive built forms and can meet or exceed the minimum transit supportive density target”.

The December 2020 Phase 1B Report revises the original April 2020 Bramalea GO Draft MTSA Profile (see **Figure 30**). The Bramalea GO Draft MTSA Profile included: the subject lands status within the MTSA, the Bramalea GO MTSA existing/target density, and preliminary boundary delineation (as mentioned above with the following exceptions):

- Existing MTSA Density:
 - Growth Plan 800 metre MTSA Radius: 17.7 ppj/ha (the existing density is a mere fraction of the Bramalea GO MTSA Density target of 150 ppj/ha)
 - Region of Peel Draft MTSA Preliminary Boundary Delineation: 34 ppj/ha (the existing density is a mere fraction of the Bramalea GO MTSA Density target of 150 ppj/ha)
- Additional People and Jobs Required to Achieve Target Density: 13,183.
- Development Capacity: *“May not meet density target despite intensification or land assembly”* (Lark has assembled six (6) parcels of land with a total area of 15.04 ha, having almost limitless re-development potential. On their lands alone, approximately 3,800 residential units and 25,730 sq. m. of non-residential development, generating 8,212 people and jobs combined could contribute to meeting the density target – see **Figure 27**).
- Zoning Capacity Rating: *“Additional residential uses may be required to meet target”*.
- Infrastructure Capacity Cost Rating: *“Medium”* *.

Note: * – Where MTSAAs did not meet density targets and existing water and wastewater systems are present, costs were assessed as medium.

- Recommendations:
 - *“In this specific case, minimum densities can be met if land use is updated, via the MCR, to support high intensification employment areas”*. (Intensification should



apply equally to residential, employment and mixed-use residential and employment sites).

- *“Based on the development and infrastructure capacity of the MTSA and future updates to regional and local land use planning, it will be delineated and can meet or exceed the Growth Plan minimum density”.*

It is noteworthy that the additional number of people and jobs required to meet the MTSA density target decreased by 2,217. Notwithstanding the Region of Peel’s assertion that the development capacity may not meet the density target, we support the December 2020 Phase 1B Report analysis and recommendations that the land uses need to be updated to accommodate the Province’s density target of 150ppj/ha.

The proposed conversion of the Bramalea GO Station Mixed Use Neighbourhood (including the subject lands) represents an opportunity to contribute significantly to meeting the density target of the MTSA. The *Emerald Heights Vision* represents a compact, transit-supportive development concept in an area of the City of Brampton which is located immediately adjacent to existing higher order transit, supported by numerous existing and proposed community services and facilities.

6.2 MTSA Regional Official Plan Amendment

While the Region of Peel currently intends to advance its MCR ROPA as one comprehensive Amendment, Regional staff advised that in the event that certain other Focus Areas of the MCR exercise are delayed, they intend to advance the MTSA ROPA as a stand-alone Amendment prior other MCR Amendments. In this regard, the Region advanced a draft MTSA ROPA as part of the December 10, 2020 Staff Report.

The MTSA’s identified within the draft ROPA require implementation within local area municipal Official Plans within one (1) year of approval. With the release of the draft MTSA ROPA it is anticipated that implementation can advance within the Region of Peel’s local area municipalities.

The following are our observations and comments regarding the Region of Peel’s draft MTSA ROPA:

6.2.1 Primary Major Transit Station Areas

- Schedule Y7: Major Transit Station Areas & Table Y1: Minimum Densities of Major Transit Station Areas - The Bramalea GO MTSA is identified as a Primary Major Transit Station Area on Schedule Y7 and Table Y1 that is planned for a minimum density target of 150ppj/ha. Pursuant to draft Policy 5.6.1.6.a) Primary MTSA’s are areas that have existing or planned transit-supportive built forms and can meet or exceed the minimum transit supportive density target.

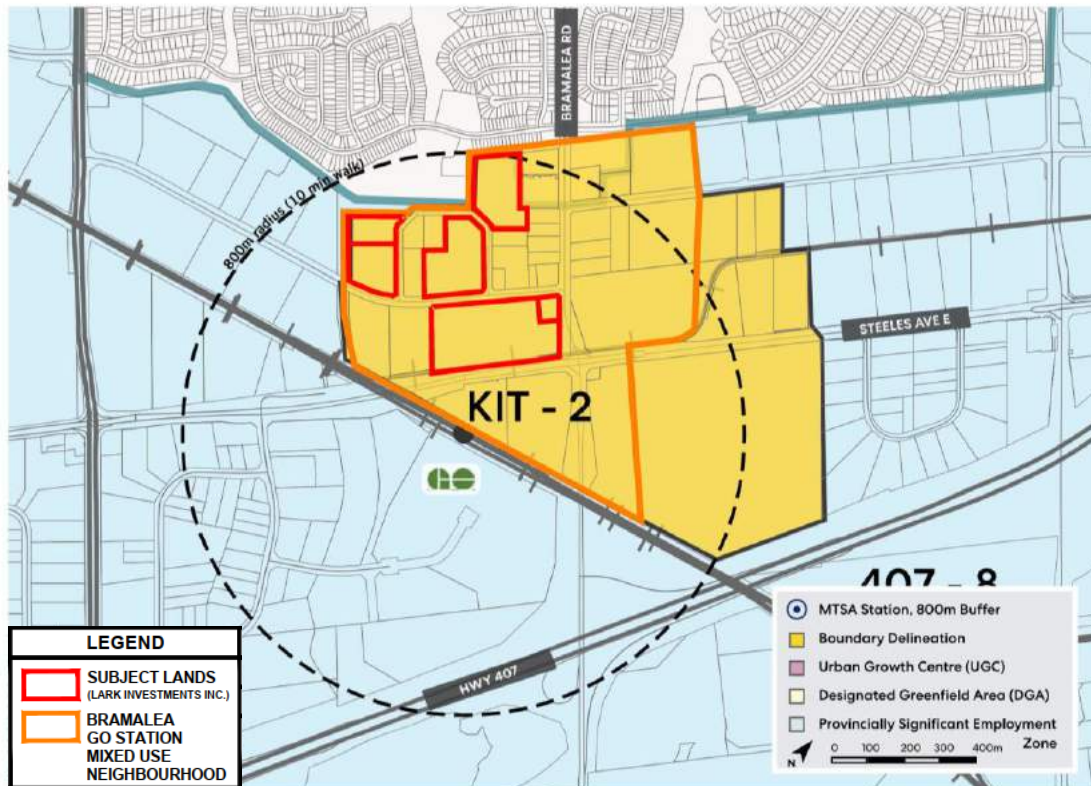
We support the classification within the Draft Preamble in Section 5.6 that MTSA’s will be planned to create a compact urban area with a diverse mix of land uses, housing types, employment, and amenities within close proximity to existing/planned transit infrastructure.



We also support the classification of the Bramalea GO MTSA as a Primary MTSA as we believe the opportunity exists for this MTSA (including the subject lands) to meet and exceed minimum density targets. This can be achieved by expanding the mix of land uses to include high density residential, retail and office commercial; supported by existing and planned infrastructure and community services and facilities.

KIT - 2 / BRAMALEA GO

DECEMBER 2020 Region of Peel
working with you



MTSA 800m Radius - 2016 Baseline

Area (ha)	201
Population	192
Employment	3,368
Total Density (ppj/ha)	17.7

MTSA Boundary Delineation - 2016 Baseline

Area (ha)	113
Population	206
Employment	3,627
Total Density (ppj/ha)	34
Growth Plan Minimum Density (ppj/ha)	150
Additional People and Jobs to Achieve Growth Plan Minimum Density (ppj)	13,183

*Data source: Scenario 16, prepared by Hemson Consulting for the Region of Peel (2016 Census Data)

Municipality: City of Brampton

Corridor: Kitchener GO

Growth Plan Priority: YES

Combined Station: n/a

Development Capacity Rating:

Zoning Capacity Rating:

Infrastructure Capacity Cost Rating:

RECOMMENDATIONS:

- In this specific case, minimum densities can be met if land use is updated, via an MCR, to support high intensification employment areas.
- Based on the development and infrastructure capacity of the MTSA and future updates to regional and local land use planning, it will be delineated and can meet or exceed the Growth Plan minimum density.

CLASSIFICATION: Primary

Regional Official Plan

Minimum Density: 150 ppj/ha

Additional People and Jobs to Achieve ROP

Minimum Density: 13,183

Figure 30: Region of Peel MTSA Profile KIT-2/ Bramalea GO December 2020



- Draft Policy 5.6.2.3e) – Directs that local municipalities establish Official Plan policy to address minimum and maximum building heights within MTSAs.

We believe that the determination of appropriate maximum building heights within MTSA's should be determined based on the merits of site-specific development applications and/or comprehensive area-based studies. The heights proposed within the Bramalea GO Station Mixed Use Neighbourhood are in keeping with the heights of existing and proposed high-density mixed use residential, retail and office commercial buildings.

- Draft Policy 5.6.2.3n) – Directs that local municipalities establish Official Plan policy to address *“land uses in Major Transit Station Areas in employment areas which are identified on Schedule Y6 and subject to policy 5.7.2.18”*.

We support Draft Policy 5.6.2.3n) and are of the opinion that Employment Areas, including the Bramalea GO Station Mixed Use Neighbourhood have the potential to become vibrant mixed-use complete communities consisting of residential, retail and office commercial uses.

We note that the Region is not recommending the expansion of permitted land uses to include non-employment uses. To the contrary, the Region of Peel is proposing that the lands located within the Bramalea GO Station Mixed Use Neighbourhood be designated as Employment in the Regional Official Plan (see Map “B” in **Appendix 1**).

While we support in principle Draft Policy 5.6.2.3n), we recommend that the permitted land uses within the Bramalea GO Station Mixed Use Neighbourhood be expanded through the MCR process to permit non-employment uses. Doing so would liberate lands within local municipalities and provide the opportunity to capitalize on their location within MTSA's. The subject lands and the surrounding Bramalea GO Station Mixed Use Neighbourhood share similar location and contextual characteristics as 69 Bramalea Road. In the City of Brampton's consideration of the amendment application for 69 Bramalea Road, they noted the following:

“Although this area is already developed with industrial uses, the Bramalea Road South Gateway Redevelopment Area is envisioned as a higher order mixed-use urban centre that will function as an urban gateway into the City.”

- Draft Policy 5.6.2.4 – Directs that the Region of Peel shall: *“Encourage the local municipalities to establish policies that support gentle intensification and improved multi-modal access and connectivity on lands within close proximity to transit stations and stops.”*

In the context of MTSA's, which by their nature are generally areas where significant density and intensification is required to achieve provincial objectives, it is unclear what qualifies as “gentle intensification” (the Draft ROPA does not include a definition of the term “gentle intensification”). The Bramalea GO Station Mixed Use Neighbourhood, can accommodate compactible forms of residential and employment land uses at densities which



would contribute to achieving density targets; in accordance with MTSA guidelines for compatible forms of intensification.

- Draft Policy 5.6.2.7b) – Directs that until such time as local Official Plan Amendments are adopted and in force for MTSA's, that proposals for development within MTSA's be reviewed to ensure that the proposed development "*supports a compact urban form that directs the highest intensity transit supportive uses close to the transit station or stop*".

The proposed addition of residential land uses within the Bramalea GO Station Mixed Use Neighbourhood supports the aforementioned draft MTSA ROPA policy. The *Emerald Heights* proposal represents an opportunity for intensification. The envisaged re-development of this older employment area will contribute to meeting the MTSA density target for this area, in a compact, transit-supportive built form, immediately adjacent to the Bramalea GO Station.

6.3 Public Input Letter, filed on behalf of Lark Investments Inc. December 9, 2020

The Region of Peel Public Works and Planning Staff tabled a Staff Report at the December 10, 2020 Regional Council Meeting that provided a status update on the Peel 2051 Official Plan Review/MCR. Delta Urban Inc. (Delta Urban) submitted a letter to the Region of Peel in advance of the Council Meeting which was dated December 9, 2020 and tabled at the January 14, 2021 Regional Council Meeting (**Appendix 1** includes a copy of Delta Urban's December 9, 2020 submission).

The Delta Urban correspondence included comments, observations and recommendations based on the review of various materials presented by Regional staff at the Peel 2051 Regional Official Plan Review Meetings, as well as the review of 'Key Policies - Draft Regional Official Plan Amendment and December 10, 2020 Staff Report' from Regional Public Works and Planning Staff.

The aforementioned written correspondence referenced our Client's intention to submit a formal request to the Region of Peel to redesignate the subject lands in order to permit the development of residential and employment land uses in a mixed-use format. It is noteworthy that our Client's intention to redevelop the subject lands was previously shared with Regional Staff. Below are the highlights of the Delta Urban correspondence:

- The subject lands are located within the Bramalea GO MTSA (as described in the preliminary MTSA Boundary Delineation Regional Staff Report, April 2020).
- The subject lands are currently permitted to be developed for a range of office and industrial uses.
- The proposed redevelopment would accommodate a mix of uses and it is projected that there is an opportunity to create more jobs than those exist today on the subject lands. The redevelopment would not only provide more employment opportunities, but would also provide a greater diversification and higher order jobs.



- In the area south of the CN railway tracks, west of Spring Creek more traditional office and industrial uses are envisaged and deemed to be appropriate.
- The proposed addition of residential land uses will increase projected on-site employment from 583 jobs to 840 jobs (an increase of almost 44% over existing employment levels).
- Residential growth will provide for increased transit ridership and the utilization of existing Bus Rapid Transit service along the Steeles Avenue East Corridor and the existing Bramalea GO Station through the provision of mixed-use and transit-oriented development.
- Considering the geography of the subject lands and surrounding area; including, existing residential to the north; Spring Creek to the west (which acts as a natural buffer to industrial uses), retail and office commercial; and high-rise residential development to the east, the proposed addition of residential land uses would allow for a seamless and gradual transition to surrounding existing uses; including, existing residential.
- The proposed addition of residential uses will facilitate additional growth and a greater range of uses on the subject lands, contributing to and forming the basis of a complete community, consisting of community services and facilities; including, multiple walkway connections to the Bramalea GO Station (which at present can only be accessed along and from Bramalea Road and Steeles Avenue East).
- The *Lark* proposal represents an opportunity to maximize and optimize existing and proposed infrastructure and the contribution the redevelopment of the subject lands can make toward implementing the City of Brampton 2040 Vision.

While the submission acknowledged that the Region of Peel is not recommending the addition of residential land uses and the conversion of the subject lands for non-employment uses, it is our respectful submission that the subject and surrounding lands should be redesignated to broaden the range of permitted land uses - including residential.

7.0 SUMMARY of PROJECT TEAM STUDIES

Several technical studies, reports and plans have been prepared in support of the *Emerald Heights Vision* for the Bramalea GO Station Mixed Use Neighbourhood, with a view to having the Region of Peel and City of Brampton expand the range of permitted land uses within this area of the City of Brampton as part of the Peel 2051 Official Plan Review/MCR; as follows:

7.1 Economic Analysis, Bramalea and Steeles (Altus Group, June 30, 2021)

Altus Group was retained to conduct an Economic Analysis of the implications associated with the *Emerald Heights Vision* which proposes land use changes in the vicinity of Steeles Avenue East and Bramalea Road. Altus Group is of the opinion that the current Region of Peel and City of Brampton land use planning framework surrounding the Bramalea GO Station does not achieve required Growth Plan density targets.



Their economic analysis demonstrates that the Bramalea GO MTSA has one of the lowest densities in the entire Region of Peel. The ability to achieve the required density is further challenged by the fact that the surrounding area is comprised mostly of older industrial and low-density commercial uses. Although there are some residential uses within the vicinity of the Bramalea GO Station, in comparison with other MTSA's this area has one of the lowest shares of residential uses.

Altus Group is of the opinion that it is not possible for the Bramalea GO MTSA to meet the required density targets based on an 'all-employment' build-out scenario. In addition, if the current market for office and industrial is indicative of the future, it is unlikely that the Growth Plan density targets will be met. While there are existing industrial uses located on the subject lands, the area in general is less marketable as compared to other employment areas located in both West Brampton and throughout the Highway 410/Steeles Avenue Area submarket(s).

According to Altus Group, there are limits to the marketability of the subject lands and the Bramalea GO MTSA for new office uses. Despite a low office vacancy rate in the City of Brampton, the Municipality has only attracted one new office development since 2015. The Bramalea GO MTSA/Mobility Hub will face a significant number of challenges in attracting and developing new office space(s) in the future.

The existing density in the Bramalea GO Station area is well below transit-supportive levels for even basic transit service. The significant amount of Provincial, Region and local transit service within the MTSA/Mobility Hub, suggests that the area should be re-oriented to make better use of available (and proposed) public service facilities. It is evident that the need to broaden the range of permitted land uses to include residential within the Bramalea GO Station Mixed Use Neighbourhood is critical to the success of the MTSA/Mobility Hub's ability to achieve Growth Plan density targets and the promotion of transit supportive development.

7.2 Servicing Analysis

SCS Consulting Group Ltd., July 22, 2021

SCS Consulting Group Ltd. (SCS) was retained to prepare a preliminary Servicing Analysis of the *Emerald Heights* proposal. The analysis consisted of a high-level assessment of servicing opportunities and constraints associated with the proposed redevelopment of the Bramalea GO Station Mixed Use Neighbourhood.

The Bramalea GO Station Mixed Use Neighbourhood is serviced by existing storm sewer, sanitary and water servicing infrastructure. The following is a brief summary of SCS findings:

- Existing and proposed storm sewer capacity and requirements are easily dealt with on a site-by-site basis and as such do not present any significant challenges to the redevelopment concept.
- The Region of Peel was consulted regarding existing development and the potential impact that the *Lark* proposal would have on sanitary servicing capacity. They advised that there are existing sanitary capacity constraints associated with the: 600mm diameter sanitary sewer on Steeles Avenue East, and the 900mm diameter sanitary sewer along Spring Creek.



Sanitary downstream analysis will be required to confirm current population and the associated demand being made on sanitary serving capacity.

- With respect to water servicing, future servicing connections will be determined based on further flow investigations related to individual proposals; including, a hydraulic water analysis to determine if any external water infrastructure upgrades are required.

7.3 Preliminary Traffic Screenline Analysis, Proposed Master Plan (LEA Consulting, July 2021)

LEA Consulting (LEA) was retained to prepare a Preliminary Traffic Screenline Analysis, Proposed Master Plan of the proposal. This included conducting a preliminary analysis for several sites located within the Bramalea GO Station Mixed Use Neighbourhood; including, the subject lands. The limits of the Study Area reflect the June 2021 Bousfields Inc. Concept Plan.

The analysis of existing travel behavior within the surrounding residential area reveals that 48% of the trips within the Study Area are made using alternative modes of transportation other than Single Occupancy Vehicles (SOV). According to LEA, the advancement of Transportation Demand Management (TDM) measures would assist in encouraging and promoting even greater use of alternative modes of transportation.

As part of the analysis, LEA studied and recommended various transportation network improvements; including, but not limited to, a new north-south road, (referred to as the *Emerald Heights Boulevard*) connecting Steeles Avenue East (and the Bramalea GO Station) to Orenda Road and Victoria Crescent, and ultimately to Victoria Park. The proposed new transportation network improvements and connections will assist in reducing access barriers to the Bramalea GO Station. They will create both pedestrian and active transportation connections between developments and throughout the whole of the Bramalea GO Station Mixed Use Neighbourhood.

LEA noted in comparing the existing and future conditions from the screenline analysis results that all movements are expected to operate within capacity (while acknowledging that there are some exceptions associated with existing conditions). They concluded that the proposed development is expected to have an acceptable impact on the surrounding road network

8.0 LAND USE DESIGNATIONS and POLICIES

The *Emerald Heights Vision* for the Bramalea GO Station Mixed Use Neighbourhood and the subject lands has been assessed and is being advanced taking into consideration the applicable policy framework which consist of the following Provincial, Regional and local governing planning policy documents:

- Provincial Policy Statement, May 2020;
- A Place to Grow: Growth Plan for the Greater Golden Horseshoe, August 2020;
- Region of Peel Official Plan, December 2018;



- City of Brampton Official Plan, September 2020;
- Highway 410 and Steeles Secondary Plan (Area 5), October 2019;
- Bramalea Mobility Hub Secondary Plan (Area 9), October 2020;
- City of Brampton Zoning By-law 270-2004, as Amended; and
- Brampton 2040 Vision.

8.1 Provincial Policy Statement (PPS), May 2020

The Provincial Policy Statement (PPS) is a governing policy document which ensures that growth and development is focused within urban and rural settlement areas. Development is to be carefully managed to achieve efficient development patterns and avoid significant or sensitive resources in order to meet current and future needs (Part IV). The PPS policies add an increased emphasis on encouraging land use patterns that are transit-supportive and optimize transit investments, as well as promote the optimal use of land, resources, infrastructure and public service facilities, along with a mix of housing, employment, recreation, parks and open spaces, and transportation choices. The Bramalea GO Station Mixed Use Neighbourhood; including, the subject lands are located within the City of Brampton which is a defined Settlement Area in the context of the PPS.

As a general policy, the PPS directs planning authorities to plan for, protect and preserve Employment Areas. The consideration of the conversion of lands within Employment Areas to non-employment uses is only to be advanced through an MCR process. The PPS directs planning authorities to promote economic development and competitiveness by encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities.

In accordance with Part V, Section 1.0, the proposed redevelopment of the subject lands and the whole of the Bramalea GO Station Mixed Use Neighbourhood serves to promote efficient land use and development patterns. The *Emerald Heights Vision* has been assessed in the context of Section 1.1 which includes policies that deal with liveable and healthy communities; including:

- Section 1.1.1: The proposed redevelopment promotes transit-supportive development and intensification. It will add to the City's growing housing supply, employment/commercial, recreation and open space uses over the long-term. The proposal's layout is cost-effective, compact and efficient. It will serve to minimize land consumption and servicing costs. All necessary infrastructure and public service facilities exist and/or are planned, and are available to meet current and projected needs.
- Section 1.1.3: Settlement Areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted. The proposal is located in an established Settlement Area, and it will serve to contribute to the range and mix of permitted land uses, served by existing and planned transit.



- Section 1.2.6: The proposed redevelopment has been advanced following careful consideration of the need to recognize adjacent land uses and implement appropriate transition and mitigation measures to ensure compatibility with both employment and residential land uses.
- Section 1.6.9: The subject lands are sufficiently sized to ensure that the adjacent Torbram Industrial Lead East Spur Line and proposed residential uses are designed and buffered from each other in accordance with Section 1.2.6 of the PPS.
- Section 1.7: The proposed redevelopment promotes opportunities for economic development and community investment-readiness, as well as promotes residential uses which can respond to dynamic market-based needs.

The proposal seeks to provide land use patterns that are transit-supportive, compact and will contribute toward the PPS goal of creating healthy liveable cities and long-term prosperity for the residents of the City of Brampton and the Region of Peel.

The proposed redevelopment is consistent and conforms to matters of Provincial interest as identified in the PPS.

8.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe, August 2020

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) is a provincial policy document which provides direction and guidance regarding growth and development. The Growth Plan seeks to support economic prosperity, protect the environment, and help communities achieve a high quality of life. The Growth Plan provides policy guidance on the integration of land use planning and transit investment to support the Provincial intensification objectives of creating compact and complete communities with a focus on strategic growth areas; including, but not limited to, MTSA's.

Pursuant to Section 1.2.1 of the Growth Plan, the proposed redevelopment conforms to Growth Plan land development principles. The proposal optimizes the use of existing and proposed infrastructure, as well as providing residential, retail and office commercial uses in a location of the City of Brampton that is accessible to transit and other amenities. It is anticipated that the proposal will contribute to the vibrancy and diversity of the Bramalea GO MTSA/Mobility Hub.

8.2.1 Growth Management

Section 2.2.1 of the Growth Plan requires that population and employment growth be accommodated by building compact, serviced, and transit-supportive communities in Settlement Areas. Growth is to be focused within the Delineated Built-up Area, Strategic Growth Areas, and locations with existing or planned transit, and areas with existing or planned public service facilities (see **Figure 31**).

The subject lands are located within the Built-up Area of the City of Brampton where infrastructure and public transit exists or is planned. The proposal will contribute to the establishment of a



complete community within the Bramalea GO MTSA/Mobility Hub; promoting further regeneration and revitalization of the surrounding neighbourhood.

Section 2.2.2 of the Growth Plan includes policies with respect to Designated Built-up Areas. The proposal represents and supports the goals and objectives of the Provincial Growth Plan. *Emerald Heights* as proposed is a transit-supportive development, consisting of a dynamic mix of land uses; including, residential, all within a Designated Built-up Area. The proposal will assist the Region of Peel and the City of Brampton in achieving the population and employment targets as set out in Schedule 3 of the Growth Plan. In addition, the proposal will assist the Region of Peel in achieving its annual 50% target for residential development within Designated Built-up Areas. It will contribute toward achieving the desired urban structure for the Bramalea GO MTSA/Mobility Hub.

8.2.2 Transit Station Corridors and Areas

The subject lands are located on a Priority Transit Corridor (see **Figure 31**). The Growth Plan includes a policy framework that governs MTSA's. The Growth Plan defines Major Transit Station Areas as:

“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk”.

The subject lands are located within the Bramalea GO MTSA centred on the Bramalea GO Station, along the Kitchener GO Corridor. Section 2.2.4 of the Growth Plan supports within the vicinity of Major Transit Station Areas the development of land at higher densities and with a broad range and mix of land uses (including residential) as a means of maximizing the efficient use of land. While the Growth Plan supports development where appropriate in all MTSA's, the Growth Plan prohibits land uses and built forms that would adversely affect the achievement of transit-supportive densities (Section 2.2.4.9 d) of the Growth Plan).

The subject lands are located within a 10-minute walk from the Bramalea GO Transit Station. It is anticipated that the proposed redevelopment of the subject lands will maximize transit-supportive densities. It is anticipated that residents, employees and employers within the Bramalea GO Station Mixed Use Neighbourhood will avail themselves of local and intra-/inter-regional transit).

The MTSA currently has a density of approximately 14 ppj/ha. According to Altus Group, of all of the GO Transit Stations located within Brampton and Mississauga, the Bramalea GO Station has the lowest existing density within an 800-metre radius. All other GO stations in the Region of Peel have a density of at least 31 ppj/ha. The redevelopment of the Bramalea GO Station Mixed Use Neighbourhood, including the subject lands, will contribute to the Growth Plan's minimum density target of 150 ppj/ha for Major Transit Station Areas. It is important to acknowledge and capitalize on the opportunity associated with the Bramalea GO Station, which is served by the



Province's GO Transit rail network (Section 2.2.4.3 c) of the Growth Plan), the Steeles Avenue East BRT, inter-/intra-regional transit, and local transit.

8.2.3 Employment

Economic development and competitiveness in the Greater Golden Horseshoe will be promoted by planning to better connect areas of high-density development to transit, as well as integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment (Sections 2.5.5.1c) and d) of the Growth Plan). Pursuant to Section 2.5.5.12, the Bramalea GO Station Mixed Use Neighbourhood is located within a Provincially Significant Employment Zone (see **Figure 32**). The Growth Plan defines Provincially Significant Employment Zones (PSEZ) as:

“Areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. Provincially significant employment zones can consist of employment areas as well as mixed-use areas that contain a significant number of jobs”.

It is important for the Region of Peel to consider the addition of residential land uses and the conversion of lands within this area for non-employment uses as a means of accommodating greater amounts of residential and employment growth. This will be necessary in order to meet the Province's population and employment forecasts, and MTSA density targets.

Similar to the PPS, a conversion to non-employment uses is required in order to allow residential development to be permitted (Sections 2.5.5.9 and 2.5.5.10 of the Growth Plan). The aforementioned Growth Plan Sections include criteria which are to be considered when assessing an employment conversion. *Lark's* position is that the *Emerald Heights* proposal conforms to the intent and spirit of the Growth Plan criteria; as it pertains to the objective of meeting required density target and maximizing and optimizing the use of existing and proposed transit infrastructure.

The *Emerald Heights Vision* has been assessed in the context of Growth Plan criteria, cross-referenced with Section 2.5.5.9; as follows:

- a) *“There is a need for the conversion”;*
 - Due to the proximity of the Bramalea GO Station, it is indisputable that the subject lands are located within a Regional MTSA/Gateway Mobility Hub. The City of Brampton envisages Gateway Mobility Hubs as accommodating a concentration of higher density residential and/or commercial, institutional and employment development. The *Emerald Heights* proposal represents an opportunity to create a dynamic location, which will contribute to developing a sustainable complete community, where residents will be able to live, work and play.

Based on the Region of Peel April 2020 Draft MTSA Profiles, the Bramalea GO MTSA consists of approximately 113 ha of land, has a current density of



approximately 14 ppj/ha and will require 15,400 persons and jobs to achieve the Growth Plan's density target of 150 ppj/ha.

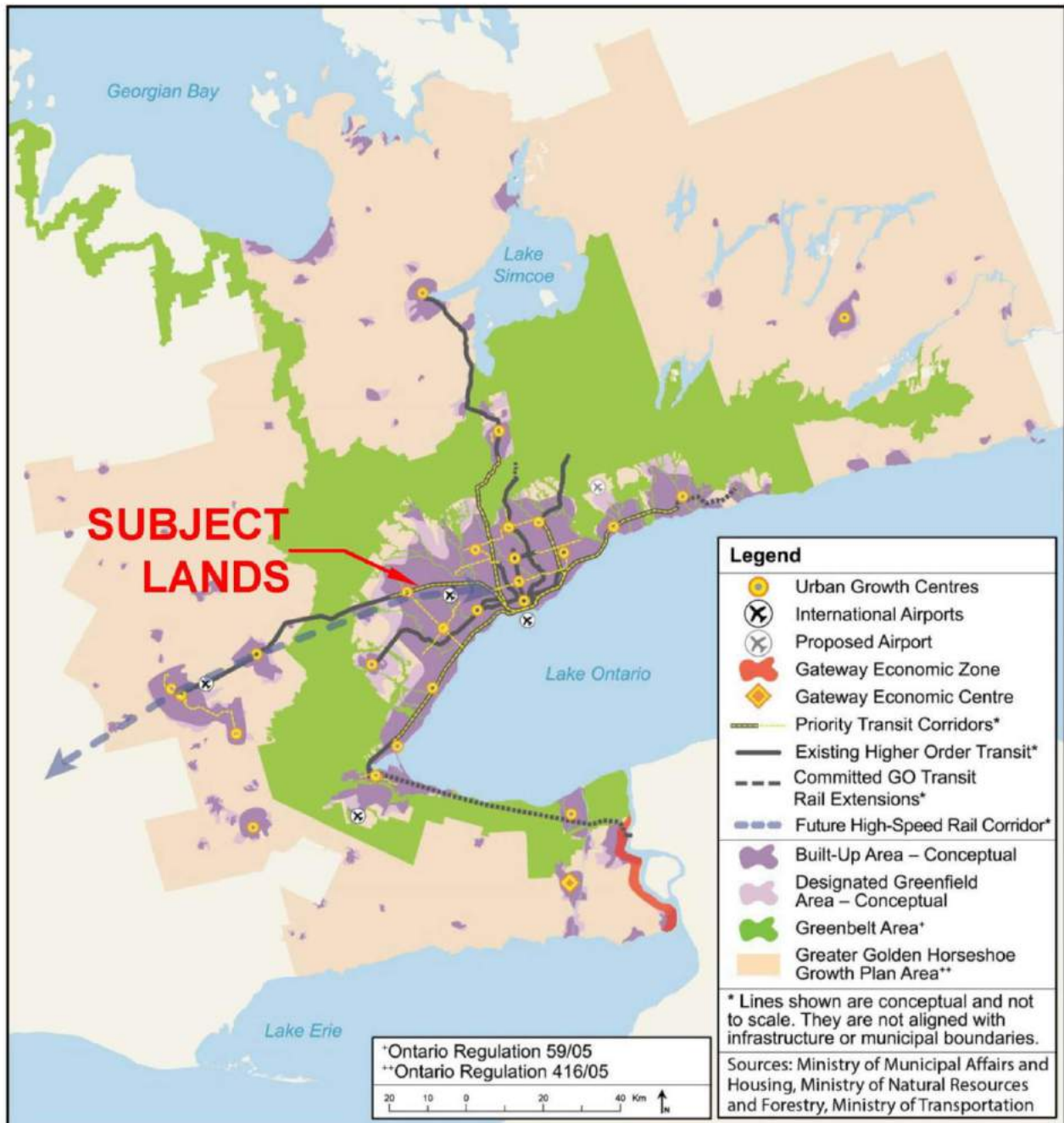


Figure 31: Schedule 5 of the Growth Plan



Figure 32: Provincially Significant Employment Zone



The Altus Group analysis indicates that if the 15,400 persons and jobs were to be achieved from only office and industrial-type development (assuming a 50/50 split between office and industrial), the Bramalea GO MTSA would require approximately 1.04 million sq. m. of net ‘new’ industrial building space and 176,515 sq. m. of net ‘new’ office space. In regards to industrial-type development, assuming industrial buildings with 50% coverage, it would take approximately 207 ha of land to construct 1.04 million sq. m. of net ‘new’ industrial buildings. With the aforementioned in mind, the Altus Group analysis concluded that:

“there is not sufficient land to achieve the density targets with any significant amount of employment coming from industrial uses.”

Altus Group is of the opinion that it is not feasible to imagine within the foreseeable future the development of 176,515 sq. m. of net ‘new’ office space.

It is our understanding that based on limited vacant employment lands in the surrounding area and a limited market for ‘new’ office uses in the City of Brampton, Altus Group is of the opinion that it would be nearly impossible to meet the density targets based on office and industrial-type development. In order to achieve the density target for the Bramalea GO MTSA, it will be necessary to allow for the development of high-density residential buildings within the Bramalea GO Station Mixed Use Neighbourhood. Doing so will greatly assist in contributing to the attainment of the Growth Plan’s minimum density target of 150 ppj/ha for MTSA’s.

b) *“the lands are not required over the horizon of this Plan for the employment purposes for which they are designated”;*

- The subject lands are located within a larger employment area anchored by the Highway 410 corridor to the west, and Goreway Drive/Torbram Road to the east, centered on the CN Brampton Intermodal Terminal. Being mindful that not all employment lands are suitable candidates for redesignation and the accommodation of a mixed of residential and employment land uses, we are of the opinion that employment lands which are located closer to Highway 410 and the CN Brampton Intermodal Terminal are best preserved for employment purposes.

According to Altus Group, the City of Brampton 2018 Development Charges Background Study forecasts that over the 2041 period that there will be approximately 771,095 sq. m of major office and 6.6 million sq. m of employment land developed within the City of Brampton (over and above existing development).

The Altus Group analyzed a May 2018 WSP Technical Paper entitled Technical Paper #4 – Employment Areas prepared in connection with the 2018 City of Brampton Comprehensive Zoning By-law Review. According to the WSP Technical Paper, lands within the City of Brampton designated ‘Industrial, Business Corridor and Office’ total approximately 4,830 ha., of which the subject lands represent only 0.31% of occupied and vacant employment lands in the entire



City. As a percentage of the Bramalea Mobility Hub Secondary Plan area, it represents 14.2%. The proposed addition of residential land use permissions and the associated conversion will not create the need for additional employment land within the City of Brampton nor the Region of Peel. Altus Group also believes that the *Emerald Heights* proposal will not hinder the ability of either jurisdiction from meeting their employment forecasts; in part because the proposal contemplates a mix of residential and employment land uses. In short, based on the aforementioned assessment, it is reasonable to opine that the subject lands are not required solely for employment purposes over the 2051 planning horizon of the Growth Plan.

c) *“the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan”;*

- Based on Altus Group’s review of the City of Brampton 2018 Development Charges Background Study forecast to the year 2041, there will be approximately 771,095 sq. m. of ‘new’ major office and 6.65 million sq. m. of ‘new’ employment land developed within the City of Brampton. In addition, according to the May 2020 Cushman and Wakefield Employment Strategy, approximately 30% (37,200 jobs) of the forecasted employment growth in the City of Brampton to 2041 will be Employment-Land-Employment (ELE); 30% (37,000 jobs) will be Population-Related Employment; and 25% (30,300 jobs) will be Major Office.

Based on Altus Group’s analysis, the *Lark* proposal will increase employment by approximately 44%; on the subject lands alone. This will reduce the City’s reliance on vacant employment lands to generate employment growth required to meet employment forecasts. As stated in the Altus Group Report:

“Therefore, even from a ‘jobs-only’ perspective, the proposed concept plan would generate more jobs on the subject properties than the current buildings/uses do.”

We are of the opinion that the City of Brampton will maintain a sufficient amount of ELE lands to achieve the employment growth forecast of the Growth Plan. The *Emerald Heights* proposal generate approximately 840 jobs and 7,372 persons on the subject lands alone. Support from the City of Brampton and the Region of Peel for the proposal to broaden the range of permitted land uses to include residential, retail and office commercial uses will allow the City of Brampton to maintain employment, while contributing to meeting forecasted population and employment growth and MTSA density targets.

d) *“the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan”;*

- Based on the December 2020 Bramalea GO MTSA Profile, the MTSA density is currently 17.7 ppj/ha, requiring the addition of 13,183 people and jobs to achieve the required Growth Plan density. The Altus Group Report estimates that the



Emerald Heights proposal will generate 8,212 persons and jobs on the subject lands alone.

The addition of residential land use permissions and the corresponding conversion will facilitate the development of a mixed of residential, retail and office commercial, as well as industrial employment such that the total number of jobs generated on the subject lands will increase by approximately 44%; without adversely affecting the overall viability of the broader employment area and its ability to contribute to achieving required density targets.

Currently, the Bramalea GO MTSA and surrounding area are developed for a variety of land uses; including, industrial, commercial, institutional, recreational and high-density residential. More specifically, the high-density residential consists of the Medallion ‘Compass’ apartment buildings located at 64 and 70 Bramalea Road, as well as the proposed 21-storey mixed-use residential/retail building at 69 Bramalea Road. The aforementioned residential land uses/designations have not adversely affected the viability of employment uses in the surrounding area.

We are of the opinion that inclusion of residential uses within Bramalea GO Station Mixed Use Neighbourhood, have not and will not adversely affect the viability of the employment lands located to the south, east and west.

- e) “there are existing or planned infrastructure and public service facilities to accommodate the proposed uses”.
- The proposed conversion is supported by existing and planned public local transit, the Steeles Avenue East BRT Corridor, inter-/intra-regional transit, and the Bramalea GO Station. The proposed addition of residential land use permissions will take advantage of existing and planned infrastructure which serves to optimize and maximize the use of Regional and local transit, transportation and servicing infrastructure. The *Emerald Heights* proposal represents a dynamic opportunity to maximize transit-supportive densities.

Notwithstanding Section 2.2.5.9, the Growth Plan also indicates that until the time of the next MCR, lands within existing employment areas may be converted to a designation that permits non-employment uses in accordance with Section 2.2.5.10; provided that the conversion satisfies the requirements of Section 2.2.5.9 a), d) and e); maintains a significant number of jobs on those lands through the establishment of development criteria; and do not include any part of an employment area identified as a PSEZ unless the part of the employment area is located within an MTSA – within which the Bramalea GO Station Mixed Use Neighbourhood is located.

Section 2.2.5.10 c) of the Growth Plan permits the conversion of PSEZ lands located outside of an MCR process provided that the lands are within an MTSA. The *Lark* proposal is appropriate as the Growth Plan provides the flexibility and opportunity for the consideration of mixed-use developments on employment lands located within ‘strategic’ MTSA’s (i.e., the Bramalea GO MTSA) outside of an MCR process.



The *Emerald Heights* proposal is supported by a multi-disciplinary consulting team. Based on a comprehensive preliminary assessment, the consulting team concluded that the *Lark* proposal conforms with Growth Plan criteria on account of the fact that it:

- Facilitates the development of a complete community containing a mixed of residential, retail and office commercial, as well as more traditional industrial uses;
- Does not impact the supply of employment lands located south of the CN railway tracks beyond the area where residential land uses are envisaged;
- Encourages and accommodate greater job growth and expanded range of goods and services for existing and proposed residents; and
- Supports investments in public transit.

8.3 Region of Peel Official Plan, December 2018

In accordance with Section 1.1 of the Region of Peel Official Plan (ROP), the ROP is meant to provide a long-term, Region-wide strategic policy framework for guiding growth and development. The ROP serves to protect the environment, manage resources and growth in an effective and efficient manner.

Designations and Classifications

The ROP includes a number of schedules and figures which serve to communicate, the relationship between land, existing and proposed resources, and infrastructure. **Appendix 2** includes a copy of the Schedules listed below:

- Schedule D - Regional Structure
 - *Urban System.*
- Schedule D4 - The Growth Plan Policy Areas in Peel
 - *Built-up Area.*
- Schedule G Rapid Transit Corridor
 - *Other Rapid Transit Corridor (Steeles Avenue East);*
 - *Existing GO Station; and*
 - *Mobility Hub – Gateway.*

Sections 1.3.6.3 and 1.3.6.4 of the ROP include numerous goals and objectives associated with the vitality and diversity of the economy. References made to the need for a sound tax base to assist with the Region's financial goals, and support for sustainable growth and development. The *Lark* proposal represents an efficient development pattern which will optimize and maximize the use of existing and planned infrastructure.



Section 4.4.1 of the ROP deals with population and employment forecasts, which serve as the basis for determining Regional services and establishing land requirements need to accommodate growth. It is noteworthy that the forecasts are meant to provide a framework for future growth in the Region of Peel. Toward this end, the population, household and employment forecasts contained in Table 3 of the ROP for the City of Brampton are based on a 2031 planning horizon, as opposed to the 2020 Provincial Growth Plan which is forecasting continued rapid growth to the year 2051. The Province has extended the planning horizon of Growth Plan Schedule 3 to 2051; inclusive of a projected Region of Peel population of 2,280,000 (a significant increase of 640,000 from 2031).

One of the objectives of the forecasts, in accordance with Section 4.2.1.2 of the ROP, is to encourage population and employment growth based on appropriate land uses. The attributes of the subject lands are conducive to the development of residential and employment land uses. The introduction and support for residential development would complement and be compatible with existing and emerging land uses and patterns development both within the MTSA and north thereof. The Bramalea GO Station Mixed Use Neighbourhood will contribute to achieving the required Growth Plan population and employment forecasts, as well as density targets.

8.3.1 Regional Structure and Urban Boundary

From the perspective of the Regional Structure, as per Section 5.1.2 of the ROP, the proposal will contribute to providing a diversity of healthy communities for those living and working in the Region of Peel; including contributing to the diversity of housing, employment and recreational activities within the Bramalea Mobility Hub Secondary Plan Area. The *Emerald Heights* proposal will optimize and maximize the use of existing and planned transportation, transit and servicing infrastructure within the Bramalea GO MTSA/Mobility Hub.

Pursuant to Section 5.1.3.1, the proposed neighbourhood will be buffered from the light industrial uses located to the west by the existing Spring Creek open space corridor and additional landscaping running parallel thereto.

The subject lands are identified on Schedule D4 – The Growth Plan Policy Areas in Peel as being located within the Built-up Area (see **Figure 33**). The Built-up Area supports the Growth Plan objectives which are geared toward managing planned development of complete communities with a view to achieving a balance of jobs and housing. The proposal supports Section 5.5.1.1 by optimizing the use of the existing land supply within the Region of Peel through intensification within the Bramalea GO MTSA. In accordance with Sections 5.5.1.5 and 5.5.1.6 of the ROP, the proposal represents a transit-oriented compact development; including, broad range and mix of land uses, transportation and transit infrastructure, as well as community services and facilities.

Section 5.2 of the ROP, references the Regional Urban Boundary within which urban growth is planned to occur over the long-term. The location of the subject lands within the Regional Urban Boundary, as well as being adjacent to existing and planned developments, is consistent with the ROP's goal of ensuring that development and redevelopment takes place in a timely, orderly and sequential manner. An additional objective of the ROP is the planned improvement live-work relationships.

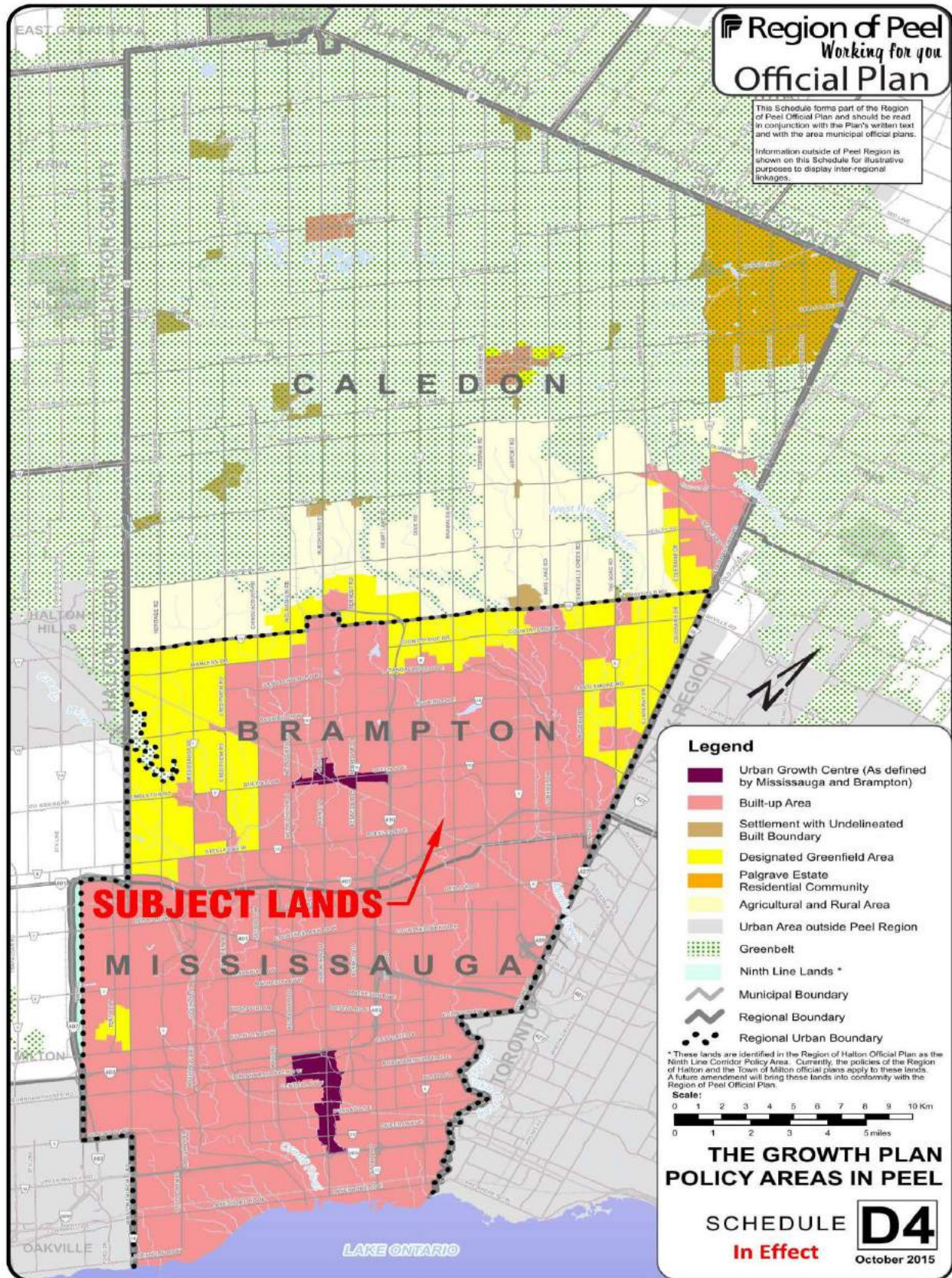


Figure 33: Region of Peel Official Plan Schedule D4



8.3.2 Urban System

Schedule D – Regional Structure of the ROP designates the subject lands and the whole of the City of Brampton as Urban System (see **Figure 34**). One of the objectives of the Urban System, as noted in Sections 5.3.1.4 and 5.3.1.5, is the recognition of the importance of a compact built form. The *Lark* proposal represents and contributes to the achievement of a compact transit-supportive development urban fabric, consisting of a mix of land uses that efficiently use land, services, and infrastructure, while taking into account the characteristics of the existing and emerging community.

8.3.3 Intensification

The proposal is in keeping with the Region of Peel's intensification objectives and policies which focus on ensuring that a significant portion of new growth occurs in the Built-Up Area. The current ROP policies do not reflect the 'new' PPS, nor the Growth Plan requirements associated with planning and development of MTSA's. The ROP is being updated in this regard as part of the current ongoing OP/MCR process.

The existing policies in the ROP refer to supporting planning for MTSA's as part of the Region's strategy for intensification. The *Emerald Heights* proposal to redevelop the Bramalea GO Station Mixed Use Neighbourhood, and specifically the subject lands for residential, retail and office commercial supports the aforementioned ROP's intensification goals and objectives (Sections 5.5.3.1 and 5.5.3.2.7) by:

- Providing a compact, efficient form of urban development;
- Accommodating intensification and revitalization within the limits of the Bramalea GO MTSA/Mobility Hub;
- Availing itself of the existing and planned transportation and transit infrastructure, as well as community services and facilities;
- Providing a mixed-use transit supportive, pedestrian-friendly urban environment;
- Contributing to the intensification and renewal within an older employment area; and
- Contributing to the achievement of a diverse and compatible mix of residential and employment land uses.

8.3.4 Employment

According to Schedule 1 – City Concept of the City of Brampton Official Plan, the Bramalea GO Station Mixed Use Neighbourhood are located within an Employment Area. The ROP recognizes the significance of employment areas as key centres of economic activity. The Region of Peel supports the protection of employment areas for employment uses (Section 5.6.2.6 of the ROP).



Similar to the PPS and the Growth Plan, Section 5.6.2.8 of the ROP includes criteria which are to be considered when proposing a conversion of employment lands. In this respect, the *Emerald Heights* proposal serves to provide employment opportunities, while at the same time facilitating residential development within close proximity of higher order transit infrastructure; conforming to the intent and the spirit of the ROP.

In addition to the criteria included in the Growth Plan, the ROP includes a number of other assessment criteria which much be considered when evaluating a proposal which seeks to convert employment lands; including, the ones listed below found in Section 5.6.2.8 of the ROP:

- v. *“The lands are not required over the long-term for employment purposes”;*
- The adjacent land uses located east of Bramalea Road, south of Steeles Avenue East and beyond already accommodate a wide variety of employment uses; including, industrial, commercial, and institutional. Based on Altus Group’s review of the Region of Peel Growth Management Policy Directions Report (May 2020), by 2041 a total of approximately 540 jobs will be provided within the area around the Bramalea GO Station. As a percentage of total City of Brampton and Region of Peel employment, the aforementioned number of jobs represents a very small proportion thereof.

The Altus Group Report states:

“According to the WSP Technical Paper for the City’s comprehensive Zoning By-law Review, the OP designations for Business Corridor, Industrial and Office are the City’s three ‘employment’ land use designations. In total, these land use designations combine for 4,830 hectares”.

The subject lands represent approximately 0.31% of all the employment lands within the City of Brampton. While there are existing industrial facilities operating within the Bramalea GO Station Mixed Use Neighbourhood, Altus Group is of the opinion that this older industrial area is in many respects obsolete and less marketable as compared to the Highway 410/Steeles Industrial Area and West Brampton. We concur with Altus Group that the subject lands are not required over the long term for the employment purposes for which they are currently designated.

- vi. *The lands do not fulfill the criteria for provincially significant employment lands”;*
- The Growth Plan and the ROP do not contain policies or criteria to guide and direct for planning and development of lands designated as falling within the PSEZs. The policies governing land use planning for MTSA’s which intersect the PSEZ are currently unknown. The Province is intending to develop and issue a PSEZ policy



implementation framework as part of the final Phase 3 process associated with the refinement of the PSEZ⁴.

We are of the opinion that the Region of Peel should consider and support the *Emerald Heights* proposal as part of the MCR process. The primary motivation for doing so is in recognition that the Bramalea GO Station Mixed Use Neighbourhood has the potential to make a significant contribute to the Province's vision for the Bramalea GO MTSA. The *Emerald Heights* proposal has contemplated represents a modern and progressive transit-oriented development, where people can live, work and play.

v. *“The lands do not affect the operations or viability of existing or permitted employment uses on nearby lands”;*

- The *Emerald Heights Vision* will accommodate approximately 7,372 persons and 840 jobs on the subject lands; current employment is estimated at 583 jobs. In addition, based on the December 2020 Bramalea GO MTSA Profile, the current density is 17.7 ppj/ha, which would require the addition of 13,183 people and jobs to achieve the required Growth Plan MTSA target.

The expansion of land use land use permissions and the redevelopment of older obsolete buildings in the area would accommodate an increase in the number of jobs by approximately 44%; on the subject lands. The aforementioned will not adversely affect the overall viability of the employment area. It is expected to contribute significantly to the achievement of Regional Official Plan intensification and density targets.

vi. *“Cross-jurisdictional issues have been considered”.*

- It is assumed and expected that any and all redesignation and redevelopment proposal will be subjected to review and approval on a cross-jurisdictional basis; as may be appropriate. By way of example, *Lark* fully expects that CN railway will be involved in the review of any proposal which may be impact on their interests in the area; including, but not limited to the Torbram Industrial Lead East Spur Line.

We are of the opinion that the *Emerald Heights* proposal conforms to the intent and the spirit of the ROP.

⁴ Region of Peel Staff Report: An Overview of the Provincially Significant Employment Zones Framework and Implications for Peel Settlement Area Boundary Expansion Study, February 19, 2020

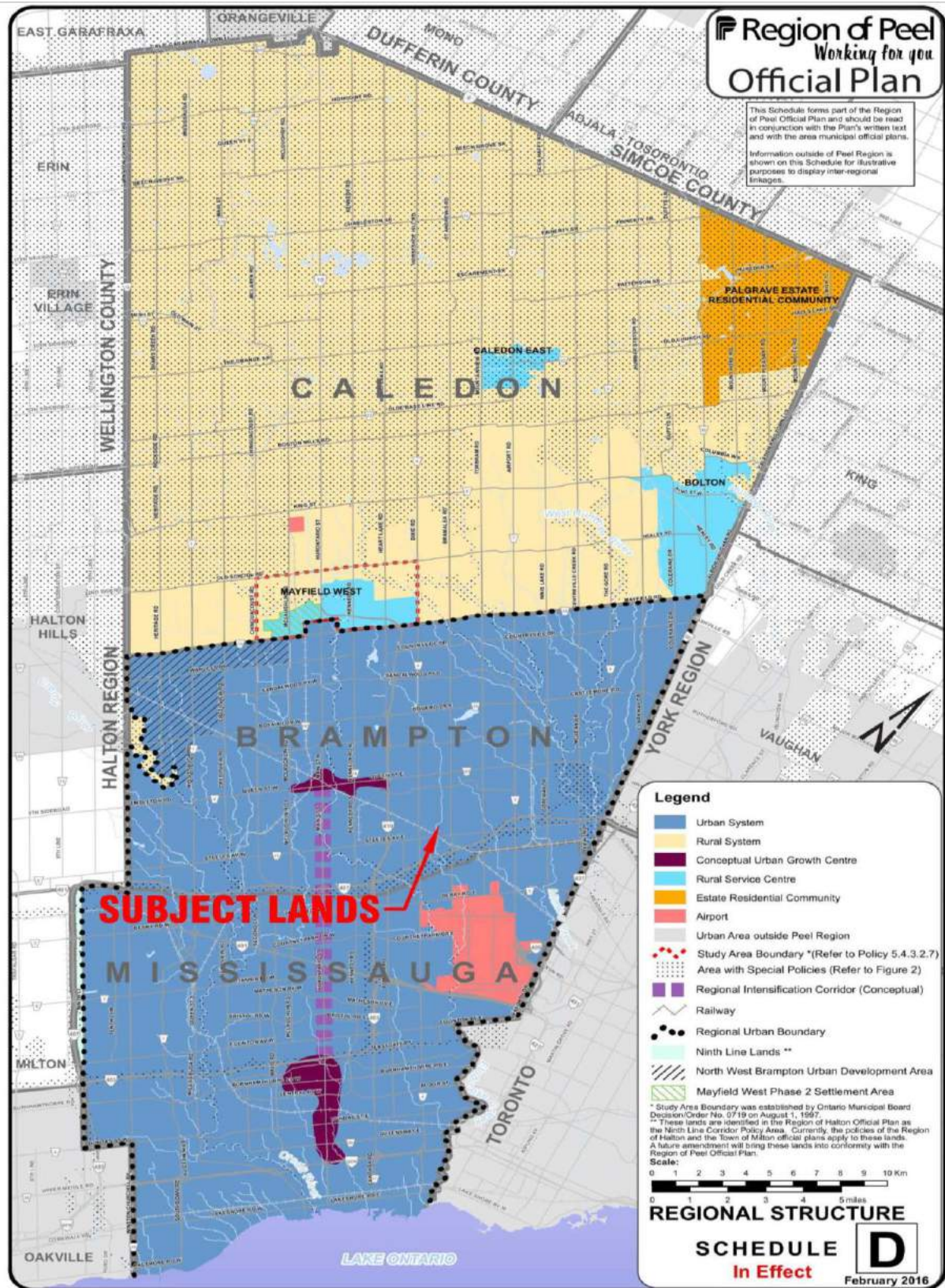


Figure 34: Region of Peel Official Plan Schedule D



8.4 City of Brampton Official Plan, September 2020

The City of Brampton Official Plan (BOP) contains policies which are similar to the ROP in terms of guiding the planning, growth and development of the municipality.

Designations and Classifications

The following is a summary of relevant designations from the BOP. **Appendix 3** includes a copy of the Schedules listed below:

- Appendix C - Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation Mapping
 - *Toronto and Region Conservation Authority Regulated Area.*
- Schedule 1 - City Concept
 - *Employment;*
 - *Primary Intensification Corridor (Steeles Avenue East and Bramalea Road); and*
 - *Gateway Mobility Hub.*
- Schedule A - General Land Use Designations
 - *Industrial;*
 - *Office; and,*
 - *Business Corridor.*
- Schedule C - Transit Network
 - *Primary Transit Corridors – Bramalea Road;*
 - *BRT Corridors – Steeles Avenue East; and*
 - *GO Rail Station.*
- Schedule C1 - Major Pathway Network
 - *Citywide Pathway Network.*
- Schedule D - Natural Heritage Features and Areas
 - *Valleyland/Watercourse Corridor.*
- Schedule F - Infrastructure, Utilities and Resources
 - *Existing Watermain Trunks (Orenda Road); and*
 - *Existing Sanitary Trunk Sewer.*

8.4.1 Economic Factors and the Role of Brampton

According to Section 2.3 of the BOP, the City of Brampton's current economy has evolved from the growth processes that have been at work in the GTHA economy and will continue to evolve in response to changing economic forces. The historic aim of the BOP has been to encourage an appropriate mix of industrial and manufacturing employment, with office development in strategic locations.



The *Lark* vision for the development of mixed-use residential and employment uses within the Bramalea Mobility Hub, coinciding with the Bramalea GO Station Mixed Use Neighbourhood, will contribute to the development of a complete community; including, residential, personal services, retail and office commercial, while providing a high quality of life. This area of the municipality has an opportunity to redevelop in a compact built form at transit supportive densities which will maximize and optimize the use of existing and planned infrastructure and services.

8.4.2 Strategic Plan

The *Emerald Heights Vision* supports the City of Brampton's Strategic Plan which focuses on contributing to the growth, prosperity and quality of life for businesses and residents alike. Section 2.4 (including 2.4.1 through 2.4.6) of the BOP addresses the City's Strategic Plan; including, what is referenced as the 'Six Pillars' consisting of:

- Modern Transportation Systems;
- Managing Growth;
- Protecting our Environment, Enhancing our Neighbourhoods;
- A Dynamic and Prosperous Economy;
- Community Lifestyle; and
- Excellence in Local Government.

The proposal to redevelop the subject lands, and the surrounding Bramalea GO Station Mixed Use Neighbourhood, for residential, retail and office commercial supports the objectives of the City's Strategic Plan by:

- Availing itself of the existing transportation network and transit system infrastructure. Bramalea Road is designated as a 'Minor Arterial' and 'Primary Transit Corridor', and Steeles Avenue East is designated as a 'Major Arterial (Regional)' and designated as 'BRT Corridors'. The intersection of Bramalea Road and Steeles Avenue East is identified as a 'Gateway Mobility Hub', reflective of the important role the Bramalea GO Station plays in providing connections to destinations throughout the Greater Toronto Area. In addition, the subject lands provide an opportunity to expand the existing Citywide Pathway Network linkages (i.e., Esker Lake, Chinguacousy and Don Doan Recreational Trails) to Steeles Avenue East (*Schedules C – Transit Network and C1 – Major Pathway Network*) (see **Figures 35 and 36**);
- Utilizing infrastructure; including, roads, sewers, water and transit that are already exists within the public rights-of-way within the surrounding the community.



- Broadening the range of permitted land uses to include residential which will contribute to accommodating projected population growth to 2051 and beyond, via higher density, transit oriented mixed-use development within a designated Mobility Hub/MTSA.
- Facilitating an opportunity to accommodate higher order employment opportunities which will result in a greater number of jobs, which will make a positive contribution to the economic prosperity and the Municipality's live/work ratio.
- Establishing through built form and higher density development a more prominent urban design profile which will assist in contributing to the visual identity of the Mobility Hub as a 'Gateway' centred on the intersection of Steeles Avenue East and Bramalea Road.
- Accommodating residential land uses that will serve to support the Municipality's housing initiatives and a more competitive business environment, all of which will contribute to making the City of Brampton a more dynamic and diverse place within which to live, work and play; all the while assisting in meeting population and employment forecasts, and MTSA density targets.

8.4.3 Sustainability

The principle of sustainable development forms the foundation of the BOP. The BOP approaches sustainability from the perspective of the City Concept, and the City's Structure. The *Emerald Heights Vision* has been advanced with the aforementioned in mind.

In accordance with Section 3.1, the *Vision* has been prepared taking into consideration the municipality's sustainable planning framework which is based on a holistic approach to planning. More specifically, the *Lark* proposal represents:

- A compact, transit-oriented and pedestrian friendly *Vision*, which accommodates residential, retail and office commercial, all within walking distance of Steeles Avenue East which has been designated a 'BRT Corridor', centered on a 'Gateway Mobility Hub', immediately adjacent to the Bramalea GO Station;
- An opportunity to broaden the range of permitted land uses which will assist in establishing a dynamic and progressive direction for an area of the Municipality which has been in transition for decades;
- An ambitious proposal which will enhance the vitality of an area of the City of Brampton which has a plethora of existing and planned transportation and multi-modal transit infrastructure which is capable of accommodating significant amounts of new development; and
- A land use concept that avails itself of existing and planned stormwater management, sanitary and water infrastructure capable of supporting significant amount of residential and employment.

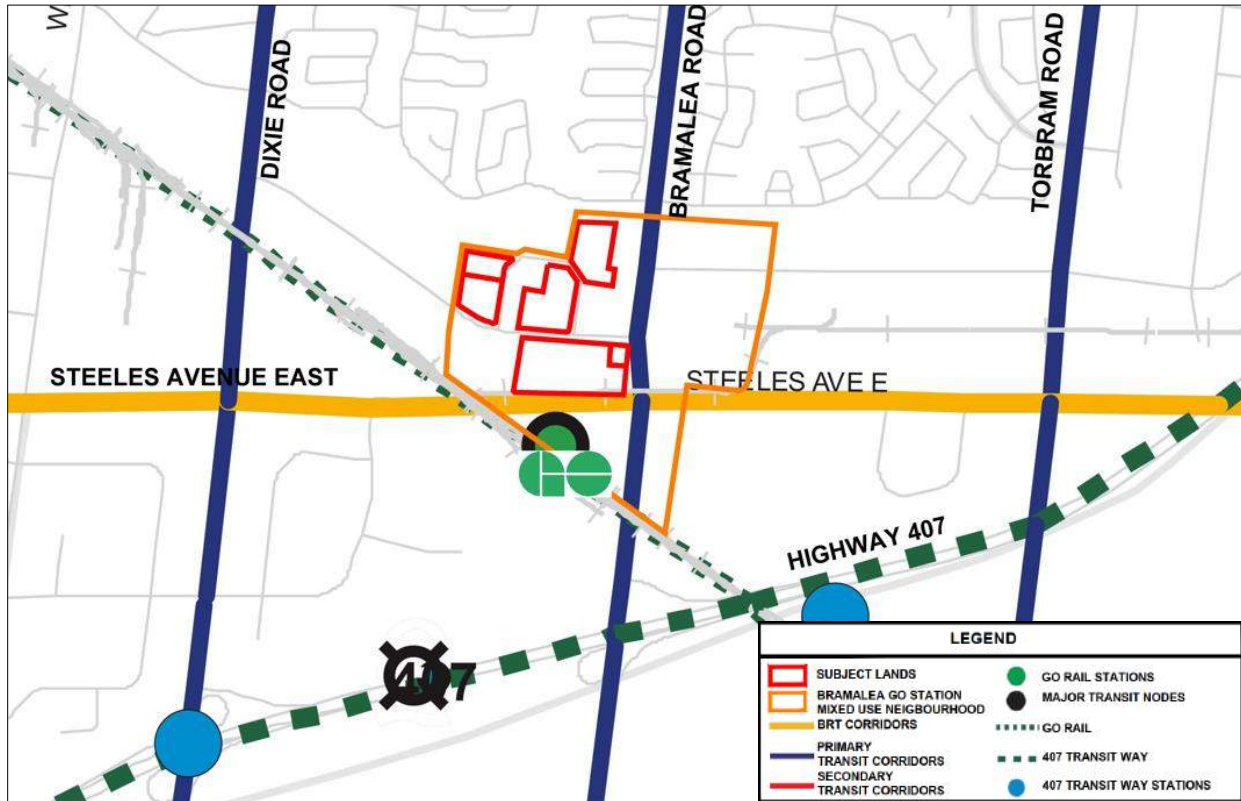


Figure 35: Extract from City of Brampton Official Plan Schedule C – Transit Network



Figure 36: Extract of City of Brampton Official Plan Schedule C1 – Major Pathway Network



Section 3.1 of the BOP includes a set of sustainability policies which focus on individual themes and types of development. The following are the most relevant in the context of the *Emerald Heights* proposal: Residential, Economic Development, Transportation and Urban Design. With the aforementioned in mind, we believe that the proposed *Emerald Heights Vision* supports the City of Brampton's sustainability policies by:

- Proposing development that will contribute to the City of Brampton's ability to evolve into a sustainable complete community; which is compact, transit-oriented and pedestrian-friendly, characterized by a mix of uses and a variety of dwelling types and diverse employment opportunities;
- Promoting active transportation; including, walking and cycling along the Esker Lake, Chinguacousy and Don Doan Recreational Trails (which are all in close proximity to the Bramalea GO Station Mixed Use Neighbourhood);
- Proposing to redevelop the subject lands in accordance with the economic development policies of the Municipality which seek to meet the needs of existing and future residents, recognizing emerging economic trends, supporting local economic competitiveness and providing sustainable employment opportunities; and
- Incorporating built form elements that will contribute to achieving an attractive massing that is compatible with the existing employment area, utilizing and applying high quality urban design principles which will contribute to creating a well-functioning community with a strong sense of place.

The BOP includes policies pertaining to the Sustainable City Structure concept in the context of the location of the lands within the Built Boundary. In this regard, Section 3.2 outlines the elements which characterize the physical structure of the City of Brampton. The *Emerald Heights* is located within a 'Gateway Mobility Hub' node, which is intended to be an area of intense concentration of employment, living, shopping and public spaces.

Based on the Peel 2051 Official Plan Review/MCR, the Bramalea GO Station Mixed Use Neighbourhood is identified as being located within a MTSA, which is meant to be the focus of intense land uses; including: residential, employment, civic, cultural and recreational uses. The subject lands are also physically located within or adjacent to a (Primary) Intensification Corridor and Employment Area (see **Figure 37**).

The *Emerald Heights Vision* supports the general policies of Section 3.2.1.1 of the BOP. More specifically, the proposal represents a compatible mix and range of land uses which will contribute to:

- Creating enhanced employment opportunities and growth in a Mobility Hub;
- Accommodating a significant amount of projected population and employment growth;
- Providing a diverse mix of land uses; including both residential and employment;



- Providing a compact urban form of development which will efficiently use land resources and physical infrastructure;
- Promoting high quality urban design which will serve to enhance the public (and private) realm, and create a distinctive and attractive sense of place;
- Achieving an appropriate transition in built form with existing adjacent land uses; and,
- Optimizing the use of existing infrastructure and services; including, transit and a well-developed transportation network.

In accordance with Sections 3.2.2.1 and 4.2.1.6, the *Lark* proposal will contribute to the City of Brampton and Region of Peel in achieving minimum density targets for ‘new’ residential development within the Built-Up Area.

8.4.4 Gateway Hubs

The BOP identifies Mobility Hubs as part of the City’s strategy to accommodate intensification, encourage transit-oriented development, and support the City’s transit network. The subject lands are located within a Gateway Mobility Hub (see **Figure 37**). Pursuant to Section 3.2.5.1 of the BOP, Gateway Hubs are MTSAs that have been identified in the Metrolinx Regional Transportation Plan (RTP) due to existing or planned levels of regional rapid transit service.

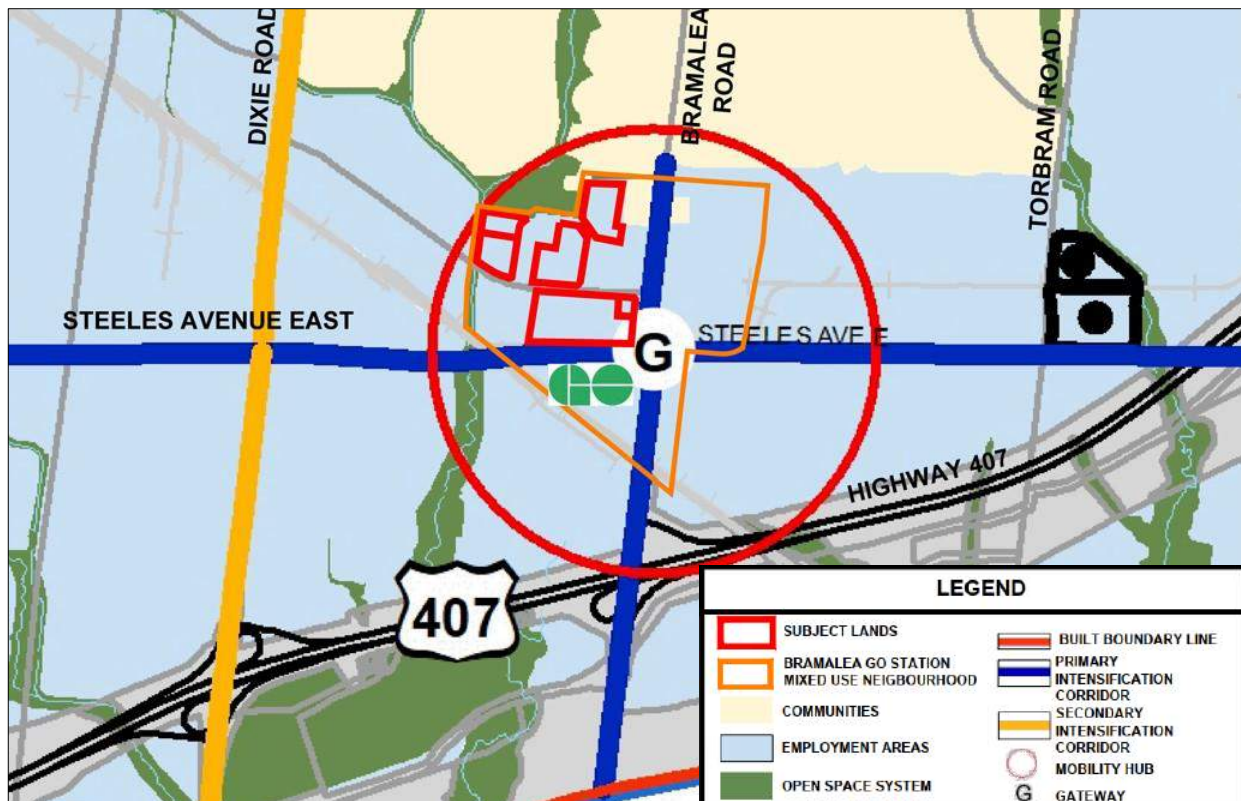


Figure 37: Extract from City of Brampton Official Schedule 1 – City Concept



The *Lark* proposal is supportive of the policy language contained within Section 3.2.5.1 of the BOP, which states in reference to ‘Gateway Hubs’ that:

“they will be planned to accommodate a concentration of higher density residential and/or commercial, institutional and employment development.”

More specifically, the BOP states that lands within the Mobility Hub should generally be planned to accommodate 100-150 ppj/ha, achieve an FSI of 3.0 over the entire Gateway Mobility Hub, with buildings ranging in heights from 3-25 storeys.

The *Emerald Heights Vision* will contribute to the City of Brampton’s ability to achieve a density of 150 ppj/ha. Based on the Altus Group evaluation it is expected that the Bousfields Inc. Concept Plan for the subject lands can accommodate approximately 7,372 residents and 840 jobs.

Pursuant to Section 3.2.5.1.5, the City of Brampton is required to prepare a comprehensive master plan for the Gateway Mobility Hub. The master plan is intended to guide land use, the distribution of density and urban form. Based on recent correspondence from City of Brampton Planning staff, it is our understanding that the City of Brampton is collaborating with the Region of Peel on the preparation of numerous MTSA Studies. They have yet to initiate the preparation of the site-specific Bramalea GO MTSA Study.

We are of the opinion that the inclusion of residential uses within the Bramalea GO Station Mixed Use Neighbourhood is of paramount importance to the Region of Peel and the City of Brampton in achieving density targets within the Bramalea GO Station MTSA. We recommend that the Region of Peel and the City of Brampton consider through the Peel 2051 Official Plan Review/MCR process to broaden land use permissions to include residential within the Bramalea GO Station MTSA and in particular the Bramalea GO Station Mixed Use Neighbourhood. The inclusion of residential and mixed-use development in this area of the City of Brampton would capitalize on intensification opportunities associated with the Bramalea GO Station, as well as existing and planned transportation, transit and servicing infrastructure.

8.4.5 Primary Intensification Corridor

Steeles Avenue East is identified on Schedule 1: City Concept as a ‘Primary Intensification Corridor’ (see **Figure 37**). According to Sections 3.2.6, 3.2.6.1 and 3.2.6.2, (Primary) Intensification Corridors are to be planned to accommodate an intense mix of residential, office, institutional, employment and commercial development that supports the transit focus of the area. More specifically, the BOP states that development within Primary Intensification Corridors should achieve an FSI of 1.5 over the entire Intensification Corridor, within buildings ranging in height from 2-10 storeys.

While the BOP states that detailed permitted land uses within each Intensification Corridor will vary based on underlying land use designations, the BOP discourages uses such as: highway commercial, auto repair, warehousing/distribution and uses involving open storage (the latter being the predominant existing land use within the Bramalea GO Station Mixed Use Neighbourhood).



The *Emerald Heights Vision* represents an opportunity for the built form of the community to align with the City's vision for the (Primary) Intensification Corridor. The *Lark* proposal will facilitate redevelopment within the Bramalea GO Mobility Hub/MTSA which will ultimately serve to strengthen not only the Bramalea GO Station Mixed Use Neighbourhood, but also neighbouring residential and employment areas through enhanced economic activity and capital expenditures.

We are of the opinion that *Emerald Heights Vision* supports, via the introduction and encouragement of a broader range of land uses the strengthening of the role and function of the (Primary) Intensification Corridor.

8.4.6 Employment Areas

The BOP identifies 'Employment Areas' as lands within Industrial and Office designations located on Schedule A – General Land Use Designations, as well as lands within the Business Corridor and Central Area designations of individual Secondary Plans. Within Employment Areas can be found clusters of business and economic activities; including, but not limited to, manufacturing, warehousing, offices and associated retail and ancillary uses. Section 3.2.7 of the BOP addresses employment areas in general, describing them as major employment districts that are strategically located in relation to major transportation infrastructure and facilities.

We are of the opinion that the *Lark* proposal is consistent with the intent and spirit of the policies found in Section 3.2.7 of the BOP. More specifically, the proposal will create a diverse range of employment opportunities, which in turn will result in enhanced employment and a more dynamic complete community. It is envisaged that in addition to historic industrial oriented employment that a broader range of employment opportunities will emerge in the retail and office commercial sectors.

We are of the opinion that the *Emerald Heights Vision*, which includes residential land uses will assist the City of Brampton in fulfilling *Planning Act* provisions as they relate to MTSA's.

8.4.7 Communities

The BOP provides a policy framework related to existing communities and the opportunities which exist for infill and intensification. The BOP indicates that new communities and new development within existing communities shall be planned to be complete communities and priority will be given to compact development which creates a pedestrian-friendly environment where uses that meet the basic daily needs of residents will be located within walking distance or easy reach of transit facilities (Section 3.2.8).

The *Emerald Heights Vision* provides for convenient access to a broad range and mix of jobs, local services, housing, as well as transportation and transit services. The *Lark* proposal will contribute to achieving a complete community, one which fosters and supports vitality and viability in the long-term. It is replete with housing opportunities in immediate proximity to local employment and connections to the greater GTA via the Bramalea GO Station.



8.4.8 Residential

The ‘Residential’ designation policies of the BOP; include, specific objectives in Section 4.2 for residential development. The *Emerald Heights Vision*:

- Encourages the development of built forms that will enhance the characteristics of the MTSA/Mobility Hub;
- Protects and enhances public safety;
- Encourages built form intensification and attractive streetscapes;
- Accommodates residential land uses which contribute to complete communities;
- Improves Brampton’s residential assessment base and supports expanded employment opportunities in an area characterized by warehousing and lower order employment; and
- Promotes the maximization and optimization of existing and proposed transportation, transit and servicing infrastructure.

8.4.9 Commercial

The “Commercial” designation policies of the BOP include Section 4.3 which are relevant in the assessment of the *Emerald Heights* proposal. The Bramalea GO Station Mixed-Use Neighbourhood as envisaged by *Lark* will:

- Support the principle of complete communities and placemaking by expanding range of permitted land uses, including, commercial activities in strategic locations such the Bramalea Mobility Hub/GO Station; and
- Encourage multi-purpose retail commercial sites, providing convenience to individual living and working within the community.

8.4.10 Employment

The City of Brampton has structured the BOP around multiple themes, one of which is Employment. Section 4.4 of the BOP acknowledges that the economy is constantly evolving, and that:

“Industrial and related employment uses represent the primary activities within Brampton’s economy and that are anticipated to continue during the period of the Official Plan.”

With this in mind, it is envisaged that the Bramalea GO Station Mixed-Use Neighbourhood will:

- Capitalize and enhance business and employment opportunities;



- Contribute toward the improvement of the 2031 live-work ratio;
- Enhance the quality of life within the community;
- Contribute toward the City's non-residential assessment base by adding to local area business activity; and
- Provide for a land use pattern that ensures that sensitive land uses are appropriately designed and buffered from other employment (industrial) land uses.

With respect to the 2031 live-work ratio, the subject lands are proposed to be redeveloped with a mix of uses with an estimated 25,730 sq. m. of non-residential space. Based on Altus Group's analysis of the *Emerald Heights Vision*, it is estimated that approximately 840 jobs will be generated on the subject lands; as compared to the currently 583 existing jobs (an increase of approximately 44%).

We are of the opinion that the addition of residential, mixed-use development and the associated conversion of employment lands will not significantly decrease the employment land supply, nor will doing so hinder the ability of the Region of Peel and the City of Brampton from meeting employment forecast(s).

8.4.11 Business Corridor

According to the BOP, the lands fronting onto Orenda Road and Steeles Avenue East are designated Business Corridor on Schedule A – General Land Use Designations (see **Figure 38**). According to Sections 4.4.1 and 4.4.1.2, the Business Corridor designation permits a broad range of employment and employment related uses. The BOP states that local area Secondary Plans are to provide further appropriate sub-designations (i.e., Prestige Industrial, Office, Mixed Commercial/Industrial, Highway Commercial, Service Commercial, Highway and Service Commercial and Business) and specific policies, requirements and restrictions governing industrial, office, retail and service uses, restaurants, hotels and motels, and entertainment uses.

We are of the opinion that the *Emerald Heights* proposal which proposes to expand the range of permitted land uses does not in any way diminish the ability of the designated Business Corridors from fulfilling their intended role and function as set out in the BOP.

8.4.12 Industrial

The lands located within the Bramalea GO Station Mixed Use Neighbourhood designated Industrial on Schedule A – General Land Use Designations of the BOP (see **Figure 38**), permit the development of light to heavy industrial uses. It is important to note that in addition to the aforementioned list of permitted uses, the BOP also allows for limited office, retail, institutional and restaurant uses. With the aforementioned in mind, and taking into consideration the transformation taking place in the employment sector, Section 4.4.2.3 of the BOP includes an important insight (see below) which should guide the Region of Peel and the City of Brampton as they formulate policy as part of the 2051 Official Plan Review/MCR:



“Section 4.4.2: Given the global shift in the manufacturing base and increasing complement in the service sector, including information and knowledge-based industries, the City will require further study to determine the composition of employment and resulting land required to realize the City’s long term economic vision...”

Based on the N. Barry Lyon Consultants Limited (NBLC) Employment Study entitled City of Brampton – Opportunities, City-Wide, for Appropriate Community Improvement Plan(s) (November 2020) prepared for the City of Brampton in connection with the assessment of the Community Improvement Plans as they relate to incentivizing employment growth, it was concluded that the City of Brampton’s existing older industrial areas present challenges for reinvestment due to: the age of the building stock, and the smaller size of land parcels which do not match current large format industrial development patterns. The Employment Study indicated that in some cases, the achievable rental rates do not justify capital investments associated with upgrading buildings. While low-density industrial uses resulting from space expansive formats generally have low employment totals (per acre) relative to office, they offer limited employment potential for residents. In addition, the Employment Study concluded that:

“While the industrial sector continues to be attractive for investment, most industrial and related sectors are employing fewer and fewer people every year due to technological disruption and changing labour dynamics. Most manufacturing and light industrial uses accommodate employment densities below 30 jobs per hectare...”

If the subject lands were to remain designated Industrial, it would be a possibility that these lands would generate less employment, thereby not providing any benefit to the Province, Region and the City in achieving employment targets (as well as density targets).

We are the opinion that through the Peel 2051 Official Plan Review/MCR and the related City of Brampton Official Plan Review, consideration should be given to the potential that the Bramalea GO Station Mixed Use Neighbourhood as for residential, mixed-use, retail and office commercial development.

8.4.13 Office

According to the preamble at the outset of Section 4.4.3 of the BOP, dealing with lands designated Office, office development can be manifest in a broad range of types and sizes. More specifically, it can materialize in the form of small professional offices or at the other extreme, large scale corporate headquarters. Pursuant to Section 4.4.3.5, the City of Brampton may permit the development of limited residential uses in combination with commercial uses, or live-work opportunities, within the Office designation to the extent designated in a local secondary plan.

The subject lands and others located at the immediate intersection of Steeles Avenue East and Bramalea Road are designated Office. The BOP envisages that this area will be transformed into an office centre. According to Altus Group, the partial vehicular access to Highway 407 from Bramalea Road limits the marketability of the Bramalea GO Station Mixed Use Neighbourhood;

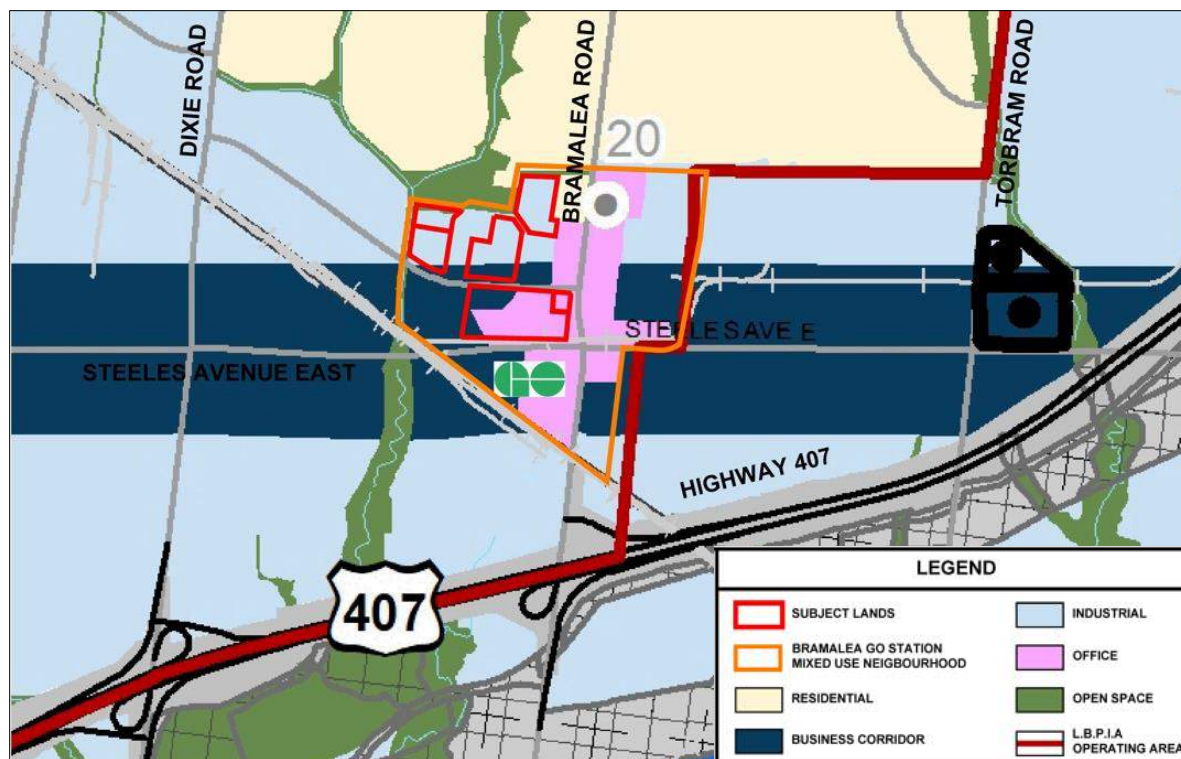


Figure 38: Extract from the City of Brampton Official Plan Schedule A – Land Use

including, the subject lands for industrial purposes as there is no direct access to Highway 407 westbound from Bramalea Road, nor is there access to Bramalea Road from Highway 407 for vehicles travelling eastbound. The Bramalea Road interchange with Highway 407 only provides access to the eastbound lanes of Highway 407 from Bramalea Road, and access to Bramalea Road from the westbound lanes of Highway 407.

With the aforementioned in mind, the November 2020 NBLC Employment Study stated that:

“the City of Brampton has not been attracting a significant amount of office development over the past decade, which is largely because office development has become increasingly concentrated within Downtown Toronto and a select few suburban nodes. This shift poses a risk for achieving the City’s intensification objectives and employment targets.”

Furthermore, the Employment Study indicated that unlike other locations in the GTHA, such as downtown Toronto, Meadowvale (Mississauga) and Vaughan Metropolitan Centre; the City of Brampton lacks a clearly defined office node. The dispersed nature of office investments in the City of Brampton presents several key challenges; including the inability to:

- Generate market momentum;
- Create agglomeration economics, and
- Transform a central location, supported by transit into a highly desirable node for commercial investment.



NBLC discussed what would need to happen to increase the City’s competitiveness in attracting employment growth and commercial investment. They did so by way of example, referencing what had been done in the City of Vaughan; as follows:

“Vaughan Metropolitan Centre should provide some optimism of what can be achieved through the right combination of transit investment, planning framework (mixed-use master plan with a focus on office, residential, and retail), financial incentives, and developers buying into the long-term vision for the area.”

The Vaughan Metropolitan Centre was an area largely dominated by big box retail and low-density industrial uses. The City of Vaughan transformed this area by planning it to accommodate higher densities and a mixed-use area consisting of: residential and office towers, parks, retail, and walkable urban amenities (all anchored by a new TTC Subway Station).

We are of the opinion that the subject lands, located at the intersection of Steeles Avenue East and Bramalea Road, provide a unique opportunity to accommodate residential uses, in combination with non-residential uses, in close proximity to the existing Bramalea GO Station.

8.4.14 Transportation

The BOP addresses the importance of an efficient road network and transportation system to maintaining a sustainable community. Toward this end, the BOP contains policies which provide for the safe and efficient movement of people, goods and services via an integrated automobile, transit, and pedestrian system.

According to the BOP, Bramalea Road is identified as a *Primary Transit Corridor* and Steeles Avenue East as a *BRT Corridor* on Schedule C - Transit Network (**Figure 35**). In the future, public transit is expected to play an ever-increasing role and function in the movement of residents and employees alike. With this in mind, the BOP includes a broad number of public transit objectives, all of which are outlined in Section 4.5.4; including, the following which are particularly relevant in the context of the proposed residential mixed-use development:

- c. *“To provide attractive and accessible services to riders including those with disabilities by improving operational efficiency, including rationalizing the transit route network, matching service levels with demands and expanding services into new developing areas, using a combination of “Corridor” and community-oriented services as appropriate;*
- d. *To support the continued expansion of conventional transit services to serve the needs of Brampton residents, employers, and their customers;*
- e. *To support the initiation and continued expansion of Bus Rapid Transit (BRT) in Brampton to serve as the key element of an effective transit service throughout the City with flexibility for BRT corridors to be operated as LRT corridors in the future.*



h. To encourage the inclusion of multi-modal transit and ridesharing facilities in new developments and in conjunction with roadway improvement projects.”

Section 4.5.4.22 states that the City shall promote the use of public transit by encouraging the development of higher density residential and employment uses in appropriate locations along intensification corridors and in MTSAs/Mobility Hubs where access to the highest order of transit can be maximized. Based on the LEA Consulting analysis, given the multi-modal transportation networks in the vicinity of the subject lands, the proposed development will be well served and have superior access to transportation and transit systems.

Section 4.5.4.31 states that the City shall promote transit supportive land uses at existing and future GO Stations identified as Gateway Mobility Hubs for higher density residential and employment development within walking distance to a GO Station; in accordance with the policies of the relevant Secondary Plan and the BOP, and the ability to physically integrate such uses with existing land uses and other planning considerations.

Brampton Transit service is provided along Steeles Avenue East and Bramalea Road (see **Figure 39**). The aforementioned transit service is integrated with the GO Transit system and Mississauga Transit; allowing residents and employees to travel freely between the City of Brampton, City of Mississauga and the Greater Toronto Area via public transit. The following is a summary of transit service available to/from the Bramalea GO MTSA:

- Züm BRT Routes 511, 511A and 511C;
- Brampton Transit 11 and 11A travel east and west on Steeles Avenue East;
- GO Bus Routes 30, 31 and 33, as well as the Kitchener GO Corridor Train, connect with the local transit routes at the Brampton GO Station; and
- Brampton Transit Routes 15, 15A, 115, 16, 13, 40 and 92 travel north and south on Bramalea Road, and stop at the Bramalea GO Station.

The location of the subject lands with frontage on both Steeles Avenue East and Bramalea Road, in close proximity to the Bramalea GO Station, affords future employees, patrons, guests, and residents with excellent ‘inter’ and ‘intra’ regional accessibility.

The BOP includes numerous references to BRT Corridors and Primary Transit Corridors. According to Section 4.5.4.2, ‘BRT Corridors’ are meant to provide high-frequency transit service on key north-south and east-west transportation/transit spines. It is envisaged that BRT Corridors could potentially operate in the future as LRT Corridors, linking major destinations both within and beyond Brampton’s boundaries. Primary Transit Corridors are meant to provide high frequency service with peak headways targeted at 5 to 7.5 minutes. These are major grid services linking destinations within the City of Brampton, as well as to external destinations. The Bramalea GO Station Mixed Use Neighbourhood is well positioned to capitalize on the Steeles Avenue East BRT Corridor and the Bramalea Road Primary Transit Corridor.

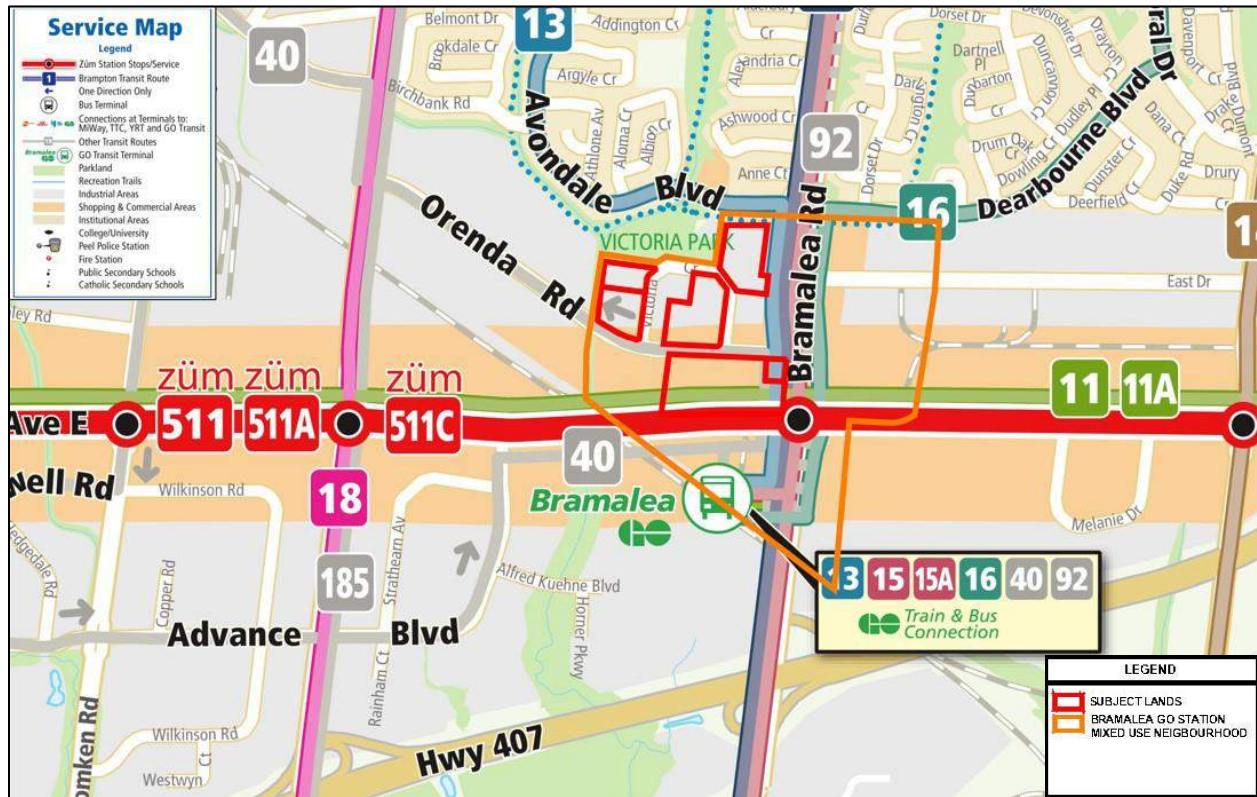


Figure 39: Extract from the City of Brampton Transit Map

With regard to transit and urban form, and in the spirit of Section 4.5.4.19, the *Emerald Heights Vision* has been prepared with the express intention of locating buildings as close as reasonably possible to the limits of the public rights-of-way of Steeles Avenue East and Bramalea Road.

According to Section 4.5.4.21 of the BOP, and consistent with the proposed redevelopment, *Emerald Heights Vision* takes into consideration access for walking and cycling in a convenient, comfortable and attractive way by providing connections to the existing pathway network.

8.4.15 Conversion of Employment Lands

Pursuant to Sections 4.4.1.7, 4.4.2.18 and 4.4.3.8 of the BOP, it is acknowledged that in order to permit the proposed residential mixed-use redevelopment, a conversion of employment uses to non-employment use through an MCR (which is currently being undertaken), is required for lands designated Business Corridor, Industrial and Office.

Similar to the PPS, Growth Plan and the ROP, Sections 4.4.1.7, 4.4.2.18 and 4.4.3.8 of the BOP include criteria which are to be considered when proposing an employment conversion. *Lark's* position is that the conversion of the subject lands conforms to the intent and spirit of the BOP criteria. Where the wording and interpretation of the policies within the BOP are similar to the Growth Plan and/or the ROP, the opinion/rationale is equivalent to the evaluation mentioned herein, save and except for those listed below.



Listed below are the criteria cross referenced with Sections 4.4.1.7, 4.4.2.18 and 4.4.3.8 along with the rationale in support thereof:

- ii. *“The City will meet the employment forecasts set out in Section 2 of this Plan”;*
 - a. The population, household and employment growth forecasts contained in Section 2 of the BOP is based on a 2031 planning horizon. According to the 2020 Provincial Growth Plan, the Region of Peel; including, the City of Brampton, is forecasted to grow rapidly to the year 2051. The Province has extended the planning horizon of Schedule 3 of the Growth Plan to 2051; inclusive of a projected Region of Peel population of 2,280,000. Based on the February 18, 2021, Peel 2041+ Official Plan Review Growth Management Presentation, the draft population and employment allocations for the City of Brampton are 985,000 and 355,000 respectively. The proposed conversion of the subject lands represents an opportunity to contribute to accommodating projected population and employment growth in an area of the City which is capable of accommodating projected population and employment growth on account the availability of existing and planned transportation, transit and servicing infrastructure, as well as community facilities and services.

An Amendment to the Secondary Plan is required to expand non-employment uses within the ‘Business Corridor’. Similar to Section 4.4.1.7, Section 4.4.1.8 includes criteria which are to be considered when expanding the proportion of non-employment uses by more than 15% of the existing gross floor area via an Amendment to the Secondary Plan. Where the wording and interpretation of the criteria is similar to Section 4.4.1.7, the opinion/rationale is equivalent to the evaluation mentioned above, save and except for those listed below:

- i. *“The change is desirable”.*
 - The *Emerald Heights Vision* which proposed to expand permitted land uses to include residential development is considered desirable within the context of the Bramalea GO Station Mixed Use Neighbourhood on account of the fact that doing so will capitalize on existing and planned transportation and transit infrastructure. The opportunity exists to reduce car dependency. Broadening the range of permitted uses in the Bramalea GO MTSA creates an opportunity to encourage and facilitate a shift in transportation and transit utilization patterns. The opportunity exists to significantly broaden and provide additional housing choices close to the Bramalea GO MTSA. It is anticipated that daily ridership for the Bramalea GO Station will increase to 8,000 persons by 2031⁵. The proposed change is considered desirable as it represents an opportunity to facilitate residential development in an area with a plethora of existing and planned transit infrastructure; including, the Bramalea GO Station and local City of Brampton transit.

⁵ City of Brampton Recommendation Report, Bramalea Mobility Hub Land Use Study, March 4, 2019



iii. “The proposed change is consistent with the intent of the *Business Corridor* designation and does not change the planned function of the existing site”.

- The proposed change will contribute to the broader Provincial, Regional and City vision for the Bramalea GO MTSA/Mobility Hub by accommodating population and employment intensification consistent with the intent of the *Business Corridor* designation. Supporting the proposed change will enhance employment opportunities in an area of the City which can accommodate significantly more development. The planned function of the *Business Corridor* designation which is to permit a broad range of employment and employment related uses will not change.

A non-employment conversion through the Peel 2051 Official Plan Review/MCR process, and the future City of Brampton Official Plan Review process will result in the broadening of permitted uses which will ultimately support the role and function that the lands located within the Bramalea GO Station Mixed Use Neighbourhood can serve due to their physical proximity to existing and planned transportation, transit and servicing infrastructure, as well as community facilities and services.

We are of the opinion that the *Emerald Heights* proposal conforms to the intent and the spirit of the BOP.

8.5. Highway 410 and Steeles Secondary Plan (Area 5), October 2019 and Bramalea Mobility Hub Secondary Plan (Area 9), October 2020

The Bramalea GO Station Mixed Use Neighbourhood, the subject lands and the Bramalea GO MTSA straddle two (2) City of Brampton Secondary Plan Areas. The *Lark* land holdings are located within the respective Secondary Plans as follows:

- **Highway 410 and Steeles Secondary Plan (Area 5)**
 - 10 Victoria Crescent; and
 - 376 Orenda Road.
- **Bramalea Mobility Hub Secondary Plan (Area 9)**
 - 26 Victoria Crescent;
 - 24 Bramalea Road;
 - 387 Orenda Road;
 - 390 Orenda Road; and
 - 391 Orenda Road.

The *Emerald Heights Vision* has been reviewed in the context of the applicable City of Brampton Secondary Plans.



8.5.1 Highway 410 and Steeles Secondary Plan (Area 5), October 2019

The subject lands known municipally as 10 Victoria Crescent and 376 Orenda Road are designated on Schedule 5: Highway 410 and Steeles Secondary Plan Area 5 as General Employment 1 and Special Policy Area (see **Figure 40**).

The ‘General Employment 1’ designation permits a broad range of industrial uses, as well as a single residential unit for the use of a caretaker or person employed for maintenance of the property or equipment.

It is proposed that the limits of the Highway 410 and Steeles Secondary Plan be revised to exclude the *Lark* properties, and that they be included within the boundary of the Bramalea Mobility Hub Secondary Plan. It is further proposed that the Spring Creek which runs parallel to the western limits of 10 Victoria Crescent and 376 Orenda Road also be excluded from the aforementioned Secondary Plan and that it acts as the new western limit of the Bramalea Mobility Hub Secondary Plan. Doing so would facilitate the proper planning and development of all of the subject lands as part of one contiguous Secondary Plan, focused on the Bramalea GO MTSA. The Spring Creek acts as a logical and physical boundary.

Pursuant to Section 7.1 of the Highway 410 and Steeles Secondary Plan, that portion of the abovementioned lands identified by the Toronto and Region Conservation Authority (TRCA) as being located below the regulatory floodline are located within the TRCA regulated area (see **Appendix 3** which includes Appendix C from the BOP). In this respect, the Ministry of Natural Resources and Forestry, the TRCA, and the City of Brampton recognize existing development and have provided for continued redevelopment and maintenance through ‘Special Policy Area’ provisions; subject to the implementation of satisfactory flood protection measures.

Flood protection measures will be determined on completion of the Region of Peel Official Plan Review/MCR process and as part of future site-specific redevelopment applications. *Lark* proposes to implement flood protection measures to the satisfaction of the TRCA and the City.

It is acknowledged that the Highway 410 and Steeles Secondary Plan will need to be updated to exclude the *Lark* properties fronting onto Orenda Road and Victoria Crescent.

8.5.2 Bramalea Mobility Hub Secondary Plan (Area 9), October 2020

The subject lands known municipally as 26 Victoria Crescent, 24 Bramalea Road, 387, 390 and 391 Orenda Road are designated on Schedule 9(A): Bramalea Mobility Hub Secondary Plan Area 9 as ‘Mixed Industrial Commercial’, ‘Mixed Use – Office and Retail’, and ‘Office’ (see **Figure 41**).

The ‘Mixed Industrial Commercial’ designation permits warehousing, manufacturing, processing, repair and servicing, the storage of goods and products, as well as offices ancillary to an industrial use. The commercial uses permitted include a limited range and amount of convenience retail, service and office commercial. In addition, Schedule 9(C) of the Bramalea Mobility Hub Secondary Plan prescribes a maximum Floor Space Index (FSI) of 0.5 (See **Figure 43**).

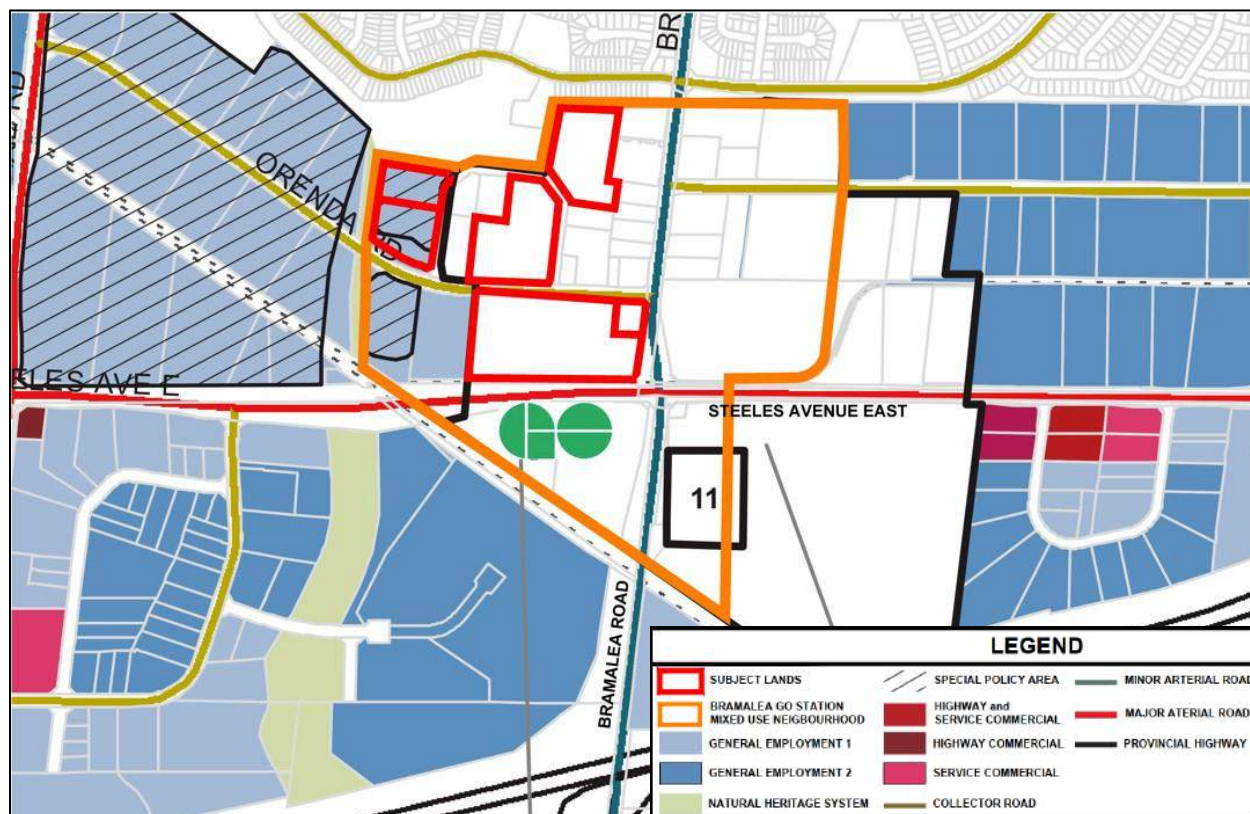


Figure 40: Extract from Highway 410 and Steeles Secondary Plan Area 5 Schedule 5

The ‘Mixed Use – Office and Retail’ designation permits business, professional or administrative office buildings, hotels and motels, and related uses (convenience and personal service retailing, restaurants, recreational, institutional, and business support activities). In addition, Schedule 9(C) of the Bramalea Mobility Hub Secondary Plan prescribes a maximum FSI of 1.5 and a maximum building height of 8-storeys (See **Figure 43**).

The ‘Office’ designation permits business, professional or administrative office buildings, and related uses (restaurants and business support activities). In addition, Schedule 9(C) of the Bramalea Mobility Hub Secondary Plan prescribes a maximum FSI of 3.0 and a maximum building height of 8-storeys (see **Figure 43**).

It is noteworthy that the majority of the lands within the proposed Bramalea GO Station Mixed-Use Neighbourhood are designated ‘Mixed Use – Office and Retail’, ‘Mixed Industrial Commercial’ and ‘Office’ with the exception of the existing Medallion Compass residential apartment buildings that are designated ‘High Density Residential’. The residential uses have coexisted with the adjacent employment activities.

The land uses on Schedule 9(A) illustrate that it is possible to plan for residential land uses and employment land uses side-by-side without any negative consequences, provided that each is designed with mitigation as may be required. 26 Victoria Crescent is developed for employment purposes (mixed-industrial commercial) and it is located immediately abutting the Medallion Compass residential apartment buildings. The most recent example is the high-density residential



development proposed at 69 Bramalea Road which is located immediately adjacent to lands which are designated and developed for employment purposes (also mixed-industrial commercial).

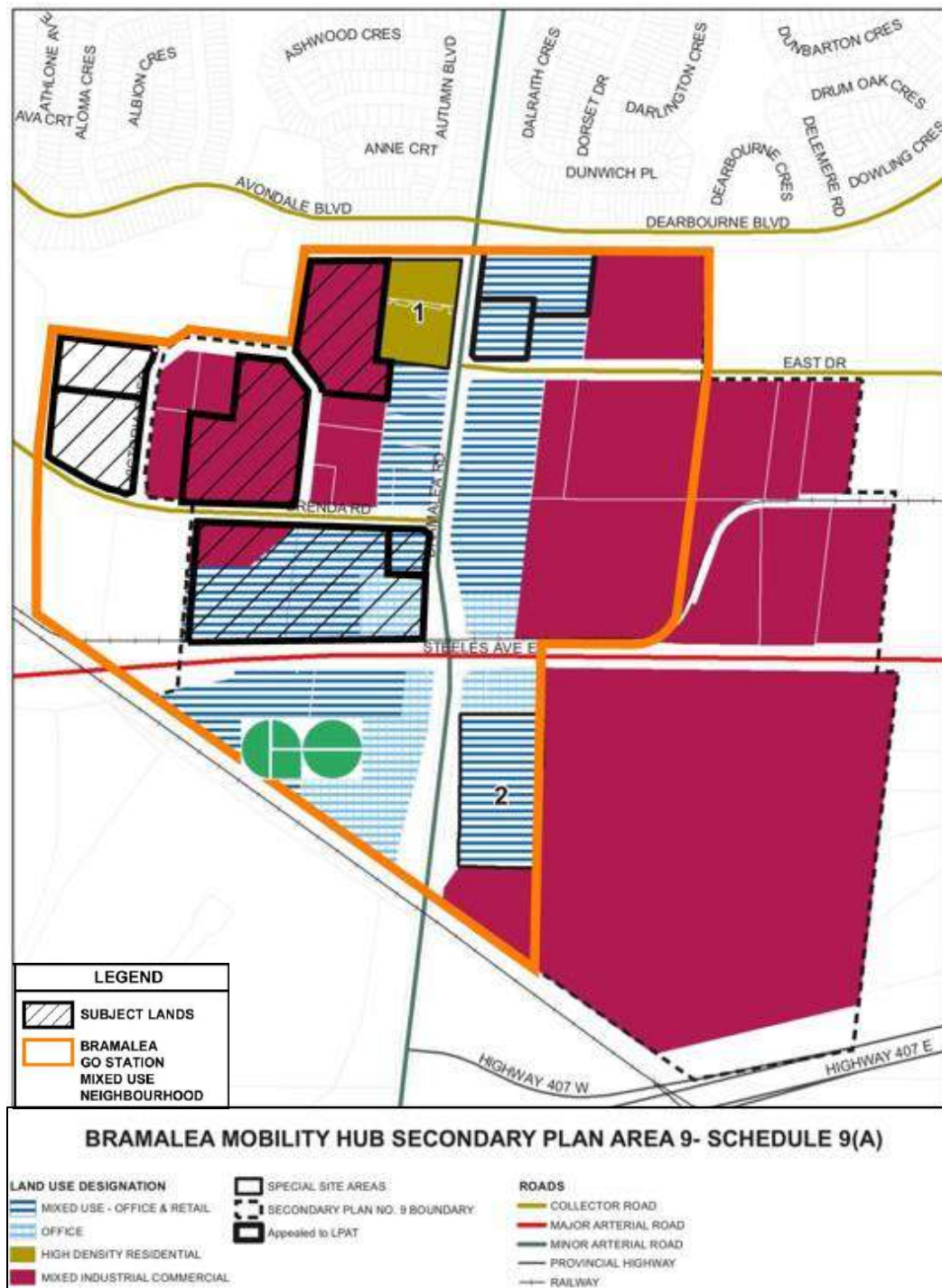


Figure 41: Extract from Bramalea Mobility Hub Secondary Plan Area 9 Schedule 9(A)

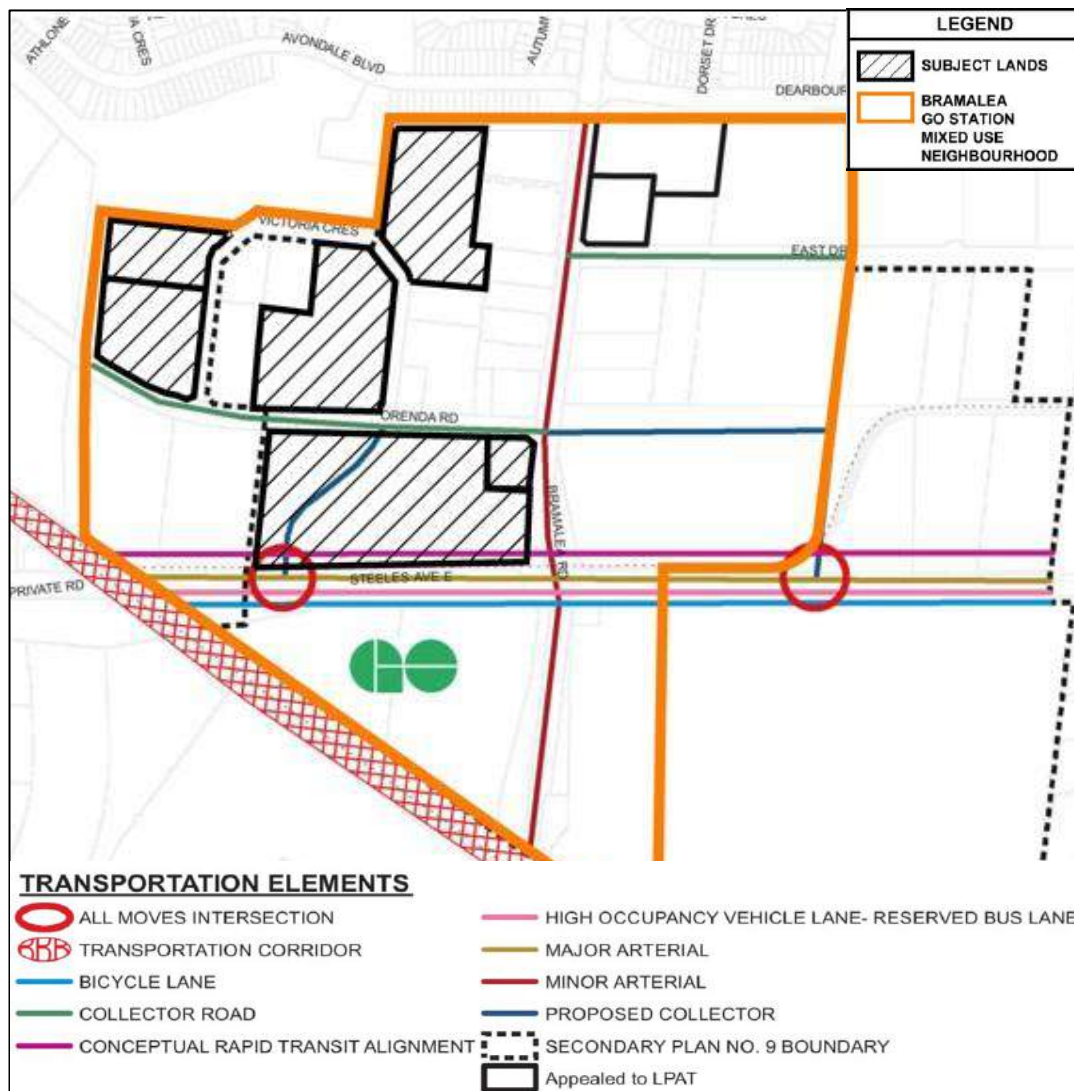


Figure 42: Bramalea Mobility Hub Secondary Plan Area 9 Schedule 9(B)

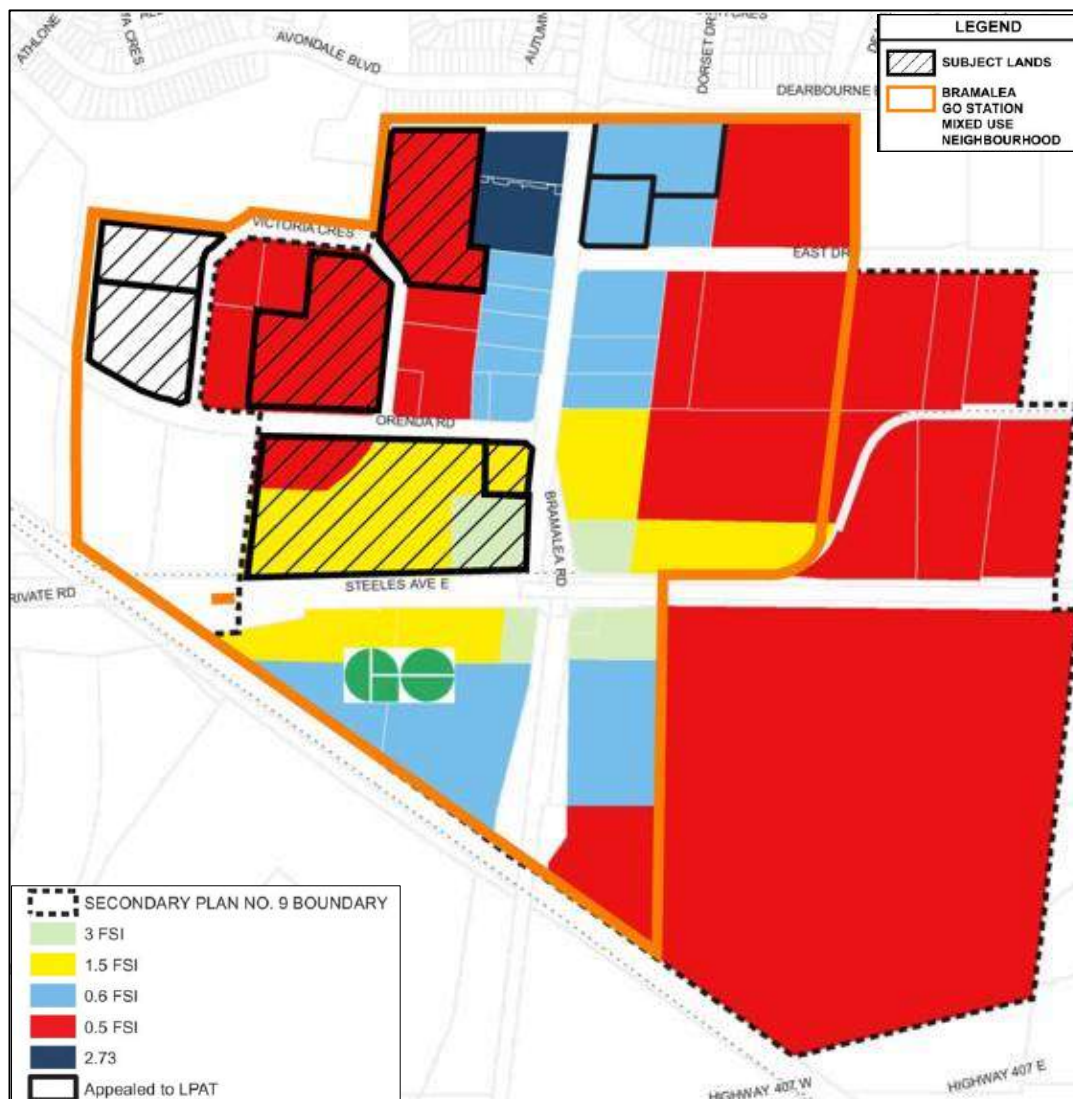


Figure 43: Bramalea Mobility Hub Secondary Plan Area 9 Schedule 9(C)

The aforementioned examples are significant in the context of the Bramalea Mobility Hub and the *Emerald Heights* proposal which envisages the expansion of permitted uses to include residential and mixed-use projects within the Bramalea GO Station Mixed-Use Neighbourhood. The *Lark* proposal is following in the ‘footsteps’ of the land use planning decisions which were made in connection with the Medallion Compass apartment buildings and 69 Bramalea Road. We are of the opinion that any potential concerns with the juxtaposition of residential and employment land uses are far out-weighted by the benefits associated with the proposed conversion which would maximize and optimize the opportunities associated with the proximity of the subject lands to the Bramalea GO Station, local transit routes and the Steeles Avenue East BRT Corridor (see **Figure 43**).

Section 1.0 speaks to the purpose of the Bramalea Mobility Hub Secondary Plan and the vision for whole of the area. According to the Bramalea Mobility Hub Secondary Plan, it is envisaged that development in this area will be at higher densities and as such transit-supportive. The lands in



this area are to be redeveloped over time with mixed-uses, and that they will function as an urban gateway into the City of Brampton. The Bramalea Mobility Hub Secondary Plan sets out an interim land use pattern, transportation network and related policies, while the Region completes the MTSA Study (as part of the Region of Peel 2051 Official Plan Review/MCR) and the City undertakes to prepare a comprehensive master plan for the Mobility Hub. The aforementioned studies will ultimately guide the assignment of land uses, densities and built forms throughout the Mobility Hub. The Bramalea Mobility Hub Secondary Plan is intended to provide an interim policy framework for the future redevelopment of the employment area; including, the Bramalea GO Station Mixed Use Neighbourhood.

8.5.2.1 General Objectives and Criteria

Section 4.0 addresses the Secondary Plan's general objectives and development criteria, as follows:

“The potential introduction of additional high density residential uses in the secondary plan area will be evaluated as part of the next Municipal Comprehensive Review to be undertaken by the Region of Peel.”

The Region of Peel is currently conducting an MCR as part of their 2051 Official Plan Review which will extend the current 2031 planning horizon. This process creates an opportunity to plan for the progressive redevelopment of the Bramalea GO Station Mixed-Use Neighbourhood. The objective is to capitalize on the opportunities presented by the plethora of transportation, transit and servicing infrastructure, as well as community services and facilities which exist in the area. We are of the opinion that the addition of residential and mixed land uses is the single greatest means of implementing the goals and objectives of the Growth Plan. Doing so supports the existing and planned regional multi-modal rapid transit infrastructure which is focused on the intersection of Steeles Avenue East and Bramalea Road. An opportunity exists to support the economic growth aspirations of the City of Brampton, the Region of Peel, and MTSA's in the Greater Toronto Area and beyond.

Section 4.0 also references local area land use planning conducted by Perkins + Wills in 2019 on behalf of the City of Brampton; as follows:

“Bramalea Mobility Hub Land Use Study prepared by Perkins + Wills, dated January 2019 concluded that, over the medium and long-term, existing older industrial/commercial uses in the area will transition to higher order mixed uses in accordance with the Provincial direction”.

With the aforementioned in mind, it is evident that the *Lark* proposal for the Bramalea GO Station Mixed Use Neighbourhood is consistent with the general thrust of the Perkins + Wills Study. The future of the Bramalea Mobility Hub includes higher order residential, retail and office commercial, as well as other compatible and complementary employment activities; in accordance with Provincial goals and objectives as articulated in the PPS and the Growth Plan.

Based on the premise of lifestyle preferences and walkable communities, the November 2020 Employment Study prepared by NBLC indicated that ‘millennials’ and the next generation of



employees are increasingly showing a preference to work and live in the same community. As a result, office tenants are increasingly gravitating towards spaces in the densest urban centres, coinciding with emerging mixed-use communities. Similar to what is proposed, in recent years, Liberty Village in the City of Toronto has seen the addition of multiple office buildings, following the influx of ‘millennials’ and retailers. Liberty Village, similar to the Bramalea GO Station Mixed Use Neighbourhood, is supported by multi-modal transit infrastructure.

From an employee perspective, the proposed redevelopment of the Bramalea GO Station Mixed Use Neighbourhood, including the subject lands, will provide an ideal location for people to achieve and maintain a more balanced live/work lifestyle by reducing overall commute times, provide an alternative to automobile dependency and improving the attractiveness of this location as a employment node.

The proposal to redevelop the Bramalea GO Station Mixed Use Neighbourhood for a mix of residential, retail and office commercial supports the general objectives and criteria included within Section 4.0 of the Bramalea Mobility Hub Secondary Plan. More specifically, the *Emerald Heights* proposal represents a compatible mix of land uses which will:

- Accommodate a concentration of higher density mixed uses and compact transit supportive built forms, supported by a pedestrian friendly streetscape;
- Facilitate the creation of an urban gateway hub centred at the intersection of Bramalea Road and Steeles Avenue East through the redevelopment of existing buildings and vacant industrial lands;
- Provide a public realm with superior architectural massing, and attention to detail having consideration for the pedestrian experience;
- Promote the highest densities and building heights at the intersection of Bramalea Road and Steeles Avenue East, with a conscious transition to lower densities and building heights further from the intersection, moving north and west toward the adjacent lower density residential community north of Victoria Park and the industrial lands west of Spring Creek respectively; and
- Propose a rail crossing of the CN spur line that provides vehicular and pedestrian access to Steeles Avenue East and the Bramalea GO Station.

8.5.2.2 Land Use Principles

In accordance with Section 5.1.1.3, the proposed Bousfields Inc. Concept Plan illustrates how the lands within the proposed Bramalea GO Station Mixed Use Neighbourhood can be redeveloped comprehensively for residential and mixed-uses, with an enhanced public realm and adherence to superior urban design principles.

The proposed Bramalea GO Station Mixed Use Neighbourhood; including, the subject lands, has been reviewed by LEA and SCS from a transportation/transit network and servicing infrastructure perspective. In accordance with Section 5.1.1.4, as part of the future detailed planning approvals



process, provisions shall be made to implement and ensure that there is adequate infrastructure capacity to support the *Emerald Heights* proposal.

Pursuant to Section 5.1.1.7, the proposed redevelopment of the Bramalea GO Station Mixed Use Neighbourhood, including, the subject lands, can be planned to ensure that the surrounding existing residential area and employment facilities can be protected from any potential adverse impacts associated with increased densities and the introduction of higher density residential development. This can be achieved through the application of appropriate transition in building height, mass, scale and density, as well as the strategic implementation of buffers.

The November 2020 Employment Study prepared by NBLC identified Downtown Brampton and the Bramalea GO Station area as candidates for establishing higher-density employment nodes. In relation to the Bramalea GO Station area, the Employment Study indicated that while the area could be transformed into a ‘new’ high density mixed-use node centred on transit, the authorities having jurisdiction must first prepare a master plan which envisages and enables the development of residential, retail and office commercial land uses. These land uses will ultimately transform the area into a pedestrian friendly, vibrant walkable community. The *Lark* proposal represents an initial and ambitious attempt at preparing a master plan for the Bramalea GO Station Mixed Use Neighbourhood.

We are of the opinion that the proposed redevelopment for residential, retail and office commercial is a logical extension to the established residential community to the north and an appropriate response to the opportunities for intensification associated with the Bramalea GO Station. The *Emerald Heights* proposal aims to facilitate the transition of what has been appropriately described as an older industrial area which is in many respects obsolete and less marketable as compared to other employment areas located in the City of Brampton and the Region of Peel as a whole.

8.5.2.3 Airport Height Limitations

According to Schedule H and Figure 6 of the Region of Peel Official Plan, the Bramalea GO Station Mixed Use Neighbourhood, including the subject lands, is not located within the Toronto Pearson International Airport Operating Area, nor the area regulated by Aircraft Noise Exposure Composite Contours. Irrespective of the aforementioned, pursuant to Section 6.3.1 of the Bramalea Mobility Hub Secondary Plan, as part of future detailed planning approvals landowners within the Bramalea GO Station Mixed Use Neighbourhood will confirm and comply with any and all height restrictions which may be imposed by Transport Canada (Nav Canada).

8.5.2.4 Transportation Network

The *Emerald Heights* proposal supports the general intent of Section 7.1.1 as it relates to the transportation network as follows by:

- Proposing the introduction of *Emerald Heights Boulevard* – a north-south road connection linking Steeles Avenue East and the Bramalea GO Station to Orenda Road, Victoria Crescent and Victoria Park (maximizing accessibility to and from the Bramalea GO Station and Victoria Park;



- Introducing a crossing of the Torbram Industrial Lead East Spur Line by *Emerald Heights Boulevard*, serving to enhance the road network and access to the Bramalea GO Station;
- Proposing to connect Victoria Crescent to Bramalea Road oppose East Drive, enhancing pedestrian and vehicular penetration and circulation within the community; and
- Promoting the use of existing and planned transit infrastructure through intensification and the addition of residential and mixed-use development, all of which should serve to increase ridership (the objective is to achieve a 30% modal split).

8.5.2.5 Railway Corridor

In accordance with Sections 7.5.1 and 7.5.2, due consideration has been extended to the Bramalea GO Station Mixed Use Neighbourhood as it relates to its location and proximity to the CN railway and the Torbram Industrial Lead East Spur Line. In the future, when development approvals are being sought, individual proponents will be required to address technical noise, vibration and safety standards, as well as setbacks and the mitigation of noise and vibration associated with rail operations.

While we are cognizant of Section 7.3.6, which states that the City of Brampton, the Ministry of Transportation and Metrolinx are required to study the feasibility of alternative locations and access to the Bramalea GO Station, Stantec has undertaken a preliminary feasibility study of the proposed at-grade crossing of the Torbram Industrial Lead East Spur Line by the proposed *Emerald Heights Boulevard* at Steeles Avenue East. The proposed crossing is located west of the intersection of Bramalea Road and Steeles Avenue East, aligning with the existing vehicular access to the Bramalea GO Station. Stantec has opined that the *Emerald Heights Boulevard* crossing of the Torbram Industrial Lead East Spur Line could be designed to comply with Federal Grade Crossing Standards and Regulations.

8.5.2.6 Water Servicing and Sanitary Sewer

According to Policy 8.1, the Bramalea Mobility Hub Secondary Plan is served by the Etobicoke Creek Central Branch existing major sanitary trunk sewer. New development within the Secondary Plan Area shall be subject to the capacity of existing piped municipal sanitary sewers and any necessary capacity enhancement.

In addition, Policy 8.2 notes that new development within the Bramalea Mobility Hub Secondary Plan shall be subject to the capacity of existing municipal water supply and any necessary capacity reinforcements.

According to SCS Consulting Group, the Bramalea GO Station Mixed Use Neighbourhood is serviced by existing storm sewer, sanitary and water servicing infrastructure. With regard to the *Lark* proposal, the analysis undertaken by SCS Consulting Group noted that:

- Existing and proposed storm sewer capacity and requirements are easily dealt with on a site-by-site basis and as such do not present any significant challenges to the redevelopment concept.



- The Region of Peel was consulted regarding existing development and the potential impact that the *Lark* proposal would have on sanitary servicing capacity. They advised that there are existing sanitary capacity constraints associated with the: 600mm diameter sanitary sewer on Steeles Avenue East, and the 900mm diameter sanitary sewer along Spring Creek. Sanitary downstream analysis will be required to confirm current population and the associated demand being made on sanitary serving capacity.
- Future water servicing connections will be determined based on further flow investigations related to individual proposals; including, a hydraulic water analysis to determine if any external water infrastructure upgrades are required.

We acknowledge that the Bramalea Mobility Hub Secondary Plan will need to be updated to support the redevelopment of the Bramalea GO Station Mixed Use Neighbourhood for residential, retail and office commercial uses at higher densities which are transit supportive; inclusive of adjusting the geographic limits thereof to include the *Lark* properties fronting onto Orenda Road and Victoria Crescent.

8.6 City of Brampton Zoning By-law 270-2004, as Amended

According to the City of Brampton Zoning By-law, the subject lands are zoned ‘*Industrial One A (M1A)*’ except for the properties municipally known as 387 and 391 Orenda Road which are zoned ‘*Industrial Two – Special Section 2939 (M2)*.’ **Figure 44** includes a map from the City of Brampton’s Plan Viewer Interactive website.

The existing Zoning By-law provisions reflect the subject lands’ BOP and Secondary Plan employment designations. The ‘*Industrial One A (M1A)*’ zoning designation permits a range of industrial and related uses, as well as limited non-industrial uses; including, a radio/television broadcasting and transmission establishment, furniture appliance store, recreational facility, community club, an animal hospital and a place of worship.

The ‘*Industrial Two – Special Section 2939 (M2)*’ zoning designation also permits a range of industrial uses and related uses, as well as office.

We acknowledge that Amendments to the Zoning By-law will be required to implement the *Emerald Heights Vision* for the redevelopment of the lands located within the Bramalea GO Station Mixed Use Neighbourhood.

8.7 Brampton 2040 Vision

The City of Brampton ‘2040 Vision’ was a public engagement process conducted by the City of Brampton in an effort to advance a more holistic plan to accommodate the projected rapid growth of the City of Brampton to the year 2040 and beyond.

The ‘2040 Vision’ is not a policy framework, but rather a concept plan/document which outlines the City of Brampton development objectives and principles which the Municipality wishes to pursue as it strives to become an innovative and sustainable suburb within the Greater Toronto Area.



Figure 44: Extract from the City of Brampton Zoning By-law 270-2004

The Brampton ‘2040 Vision’ contemplates the redevelopment of the subject lands through identification as a ‘Town Centre’, entitled ‘BramGO’ (see **Figure 45**). Town Centres are meant to be local-oriented work/live business nodes that are complete, full service, mixed-use areas with an abundance of work space and multiple-family housing options. In accordance with the ‘2040 Vision’ the proposed redevelopment of the subject lands will leverage the unique features of the Bramalea Mobility Hub. The ‘2040 Vision’ imagines the area being characterized by: new landmarks, retail and office commercial, a mix of housing types, local and regional transit connections, and an internal street system facilitating internal circulation of pedestrians and cyclists.

The *Emerald Heights Vision* supports the goals and objectives of the City of Brampton ‘2040 Vision’. Implementation of the *Lark* proposal will assist the City of Brampton and the Region of Peel in transforming the Bramalea GO Station Mixed Use Neighbourhood from an older industrial area, which in many respects is obsolete and less marketable as compared to other employment areas, into a more compact, higher density mixed-use urban complete community, capable of accommodating a significant portion of the City’s projected population and employment growth.

The *Lark* proposal will assist the City of Brampton in achieving the ‘2040 Vision’ associated with reducing the number of residents commuting out of the City of Brampton on a daily basis to jobs located elsewhere in the Greater Toronto Area and beyond. The *Emerald Heights* proposal will



create opportunities for enhanced live/work balance. It is also representing an opportunity to maximize and optimize the use of existing and planned transportation, transit and servicing infrastructure, as well as community services and facilities.

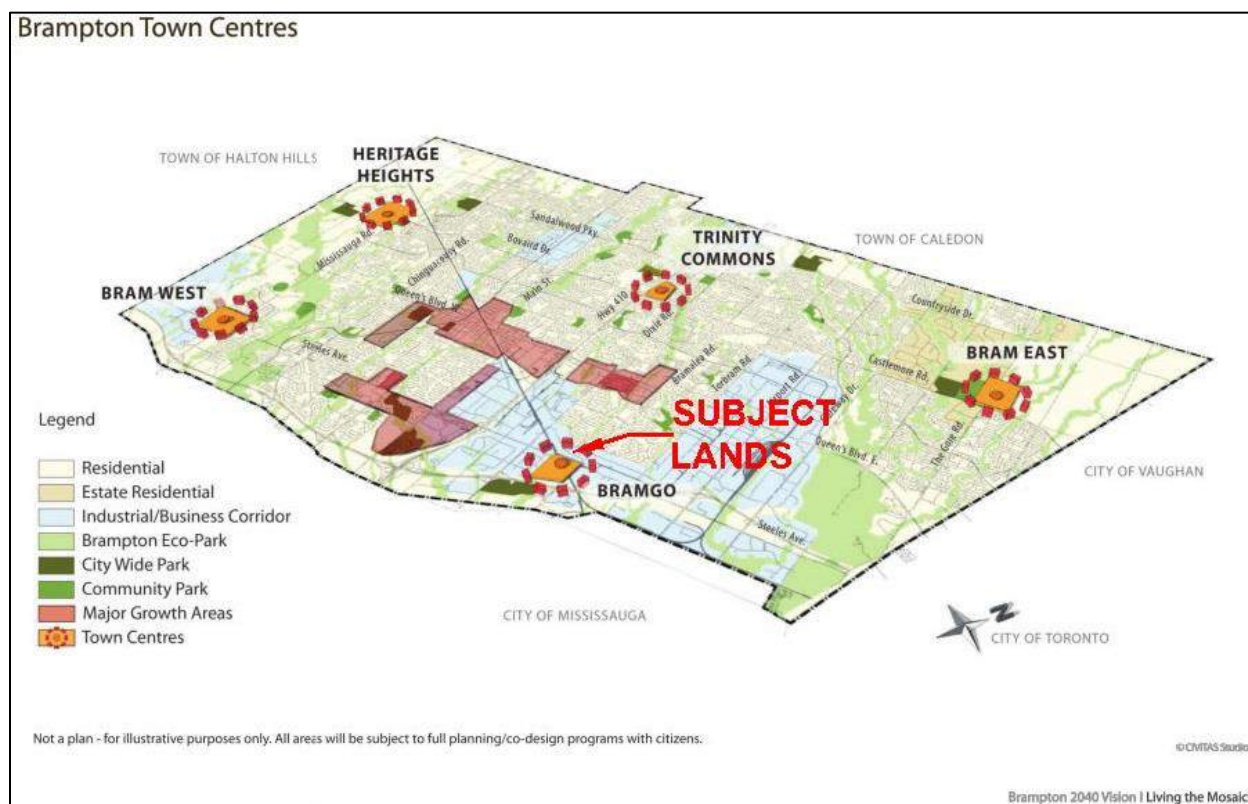


Figure 45: Extract from Brampton 2040 Vision Plan – Brampton Town Centres

9.0 CONCLUSION

According to the 2020 Growth Plan, Mobility Hubs are intended to play a significant role and function in accommodating population and employment growth. With this in mind, the *Emerald Heights Vision* advanced by *Lark* proposes a progressive and practical redevelopment plan for the Bramalea GO Station Mixed Use Neighbourhood; including, the subject lands, focused on the intersection of Steeles Avenue East and Bramalea Road. The ambitious plan imagines the development of a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/transit-supportive and pedestrian-oriented. The *Lark* proposal as illustrated on the Bousfields Inc. Concept Plan has as one of its key design principles the inclusion of a grand landscaped promenade referenced as the *Emerald Heights Boulevard* which connects Steeles Avenue East and the Bramalea GO Station to Orenda Road and Victoria Park.

The *Emerald Heights Vision* capitalizes on the location of the Bramalea GO Station Mixed Use Neighbourhood relative to the Bramalea GO Station, Bramalea Mobility Hub Secondary Plan Area and the Bramalea GO MTSA to advance a complete community which will be characterized by:



- Creating an integrated, balanced, and complete community of high quality residential, commercial, institutional and open space uses that reduces car dependency, allowing residents to live, work, and shop in the same area;
- Mixed-use corridors achieved through the re-urbanization of streets that are framed by pedestrian scaled street-walls, lined with active uses;
- Gateway and place making opportunities throughout the *Emerald Heights Vision*; including, but not limited to the intersection of Steeles Avenue East and Bramalea Road;
- Transit-supportive and pedestrian friendly built forms and densities to support the Mobility Hub and rapid transit corridors, thereby creating districts along transit routes that are animated, attractive and safe;
- Compatible development that achieves Provincial, Regional and Municipal policy objectives while responding to appropriately to the existing built form context and transition therefrom;
- The efficient use of existing and planned servicing and transportation infrastructure;
- Recognizing, enhancing and expanding on the existing natural heritage and open space network;
- The creation of more walkable blocks by providing connections that extend logically to the surrounding street network;
- Providing new residential units in a mix of housing choices to meet the evolving future needs of the community; and
- Green connections that serve to improve the connectivity of the neighbourhood through linkages to the existing trail and open space network.

The policy direction of the Growth Plan makes it necessary to review the planning framework under the Region of Peel 2051 Official Plan Review/MCR process and ultimately the City of Brampton Official Plan Review, leveraging the unique opportunities of the Bramalea Mobility Hub Secondary Plan Area. In the context of the aforementioned process, we respectfully request that the Region of Peel and the City of Brampton consider expanding the range of permitted uses, via the conversion of the lands located within the Bramalea GO Station Mixed Use Neighbourhood, to include residential, retail and office commercial, as well as other currently permitted employment uses. Doing so will assist in meeting Growth Plan density and land use targets.

Thank you for this opportunity to share our comments, observations and recommendations on the Region of Peel 2051 Official Plan Review/MCR process. We respectfully request to be informed of any and all future Open House and Statutory Public Meetings associated with this process. We would also appreciate receiving copies of future staff report associated with this exercise. Lastly,



we would ask to be informed of the Region's Decision regarding the future adoption of any and all Official Plan Amendments arising from the Region of Peel 2051 Official Plan Review/MCR process.

Should you have any questions, please do not hesitate to contact any of the undersigned.

Yours truly,

**Michelle Harris, M.Sc.
Planning Associate**

**Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Principal Planner**

**Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Managing Principal Planner**

- cc. **A. Smith, Region of Peel**
 D. Wedderburn, Region of Peel
 B. Bjerke, City of Brampton
 C. LaRota, City of Brampton
 S. Ebrahim, Lark Investments Inc.
 M. Ghassan, Delta Urban Inc.
 M. Pestaluky, Delta Urban Inc.
 K. Chan, Lea Consulting Ltd.
 C. Sidlar, Lea Consulting Ltd.
 J. Hazelton, SCS Consulting Group Ltd.
 S. Kurtz, SCS Consulting Group Ltd.
 D. Falletta, Bousfields Inc.
 A. Ouwendyk, Bousfields Inc.
 D. Keleher, Altus Group Limited
 S. Rahman, Stantec Consulting Ltd.
 S. Donald, Stantec Consulting Ltd.



APPENDIX 1



December 9th, 2020

Sent via email <regional.clerk@peelregion.ca>

Regional Municipality of Peel
10 Peel Centre Drive, Suite A and B
Brampton, ON L6T 4B9

Attention: Regional Municipality of Peel
Chairman and Members of Council

Re: Region of Peel Council December 10, 2020
Lark Investments Inc.
Bramalea GO Station
City of Brampton, Region of Peel

Delta Urban Inc. is the consultant representing Lark Investments Inc. (the "Client") with respect to lands they own at the northwest corner of Bramalea Road and Steeles Avenue East ("Subject Lands"). Our Client is a major stakeholder in the northwest quadrant of Bramalea Road and Steeles Avenue East. The Subject Lands are approximately 11.5 hectares in size and are known municipally as 10 Victoria Crescent; 376 Orenda Road; 387 and 391 Orenda Road; and 26 Victoria Crescent in the City of Brampton. The Client has assembled a consulting team to assist with the process of planning and redeveloping the Subject Lands; including:

- Delta Urban Inc. – Project Manager
- Gagnon Walker Domes Ltd. – Land Use Planning
- Altus Group – Land Economist
- SCS Consulting Group Ltd. – Civil Engineering

Our Client is working to expand the consulting team to include transportation/transit expertise.

On behalf of our Client, we have had the opportunity to review the material presented by Regional Staff at the Peel 2041+ Regional Official Plan Review meetings as part of the Municipal Comprehensive Review. We have also reviewed the 'Key Policies Draft Regional Official Plan Amendment and Council Report which is scheduled to be presented to Regional Council on December 10th, 2020.

In advance of the aforementioned meeting, we are pleased to provide comments for your consideration. Our Client is preparing to submit a formal request to the Region of Peel to re-designate the Subject Lands



to permit the development of residential/mixed uses. Our Client did not pursue this request earlier in order to avoid circumventing the Municipal Comprehensive Review process, although our Client's intent has been shared with Regional Staff. Regrettably, based on our review, it is evident that Regional Staff have not included residential/mixed uses on and within the vicinity of our Client's Lands. We are of the opinion that our Client's lands should be re-designated residential/mixed-use; on the basis that:

- The Subject Lands are within the Bramalea GO Station Major Transit Station Area ("MTSA") on Steeles Avenue East, as described in the preliminary MTSA Boundary Delineation that is identified in the Regional Staff Report from April 2020. Please refer to Map "A" for reference to the Subject Lands location and their proximity to the Bramalea GO Station.
- The Subject Lands are currently permitted to be developed for office and industrial uses.
- The proposed redevelopment would accommodate a mix of uses and it is projected that there is an opportunity to accommodate significantly more jobs on the Subject Lands. The redevelopment would not only provide more employment opportunities but would also provide a greater diversification of jobs.
- On a go-forward basis, in the area south of the railway tracks, west of Spring Creek more traditional office/industrial uses are most appropriate.
- The proposed conversion will increase on-site employment from 470 existing jobs to approximately 1,300 projected jobs (an increase in the order of almost 177%).
- Residential growth will provide for increased transit ridership and the utilization of the already existing Bus Rapid Transit service along the Steeles Avenue East corridor and the existing Bramalea GO Station through the provision of a mixed-use, transit-oriented, and complete community.
- Considering the geography of the Subject Lands and surrounding land uses; including existing residential to the north, Spring Creek to the west (which acts as a natural barrier from existing industrial uses), and retail/office and high-rise residential development to the east, the proposed conversion would allow for a seamless and gradual transition with the existing residential community.
- The proposed conversion will facilitate additional growth and a greater range of uses on the Subject Lands forming the basis of a complete community consisting of amenities for the surrounding community (both employment, commercial and residential), as well as multiple walkway connections to the Bramalea GO Station; which at present can only be accessed from Bramalea Road.
- Our opinion on the Bramalea GO Mobility Hub Study and those contained therein represent an opportunity to maximize and optimize the ability of the lands owned by our Client and their neighbours immediately north of the CNR to contribute to the implementation of the intent and purpose of the City of Brampton 2040 Vision.

In the Regional Staff Report and presentation from April 2020, the Bramalea GO Station is referred to as a 'priority' station with 'limited potential/low priority'. We recognize that the Region has conducted their analysis based on existing station conditions. We note that the Region is not recommending a conversion of the Subject Lands to support non-employment uses, but rather that the Subject Lands be designated



as Employment in the Regional Official Plan, as per draft Schedule Y-6 which designates the Subject Lands as 'Employment Area' (see Map "B"). However, we believe that this approach will be detrimental to the future of the Bramalea GO Station and the promising opportunity that our Client's vision represents for the Subject Lands and surrounding properties. While 'Appendix III – MTSA Draft Policies' to the December 10, 2020 Report designates the Bramalea GO Station as a 'Primary Station', we respectfully request confirmation on the 'priority level' being assigned to the Station at this time, and the types of land uses that would be accommodated.

The conversion request on the Subject Lands is supported by a multi-disciplinary consulting team and conforms with the criteria of the Growth Plan. Our Client has engaged the services of a professional land use planner, and land economist to review the impacts of the proposed employment land conversion. Their review concluded that the proposed employment land conversion conforms with the criteria of the Provincial Growth Plan and the Region of Peel as it facilitates: the development of a complete community; would not impact the supply of employment lands located south of the railway tracks beyond where the transition is taking place; would encourage greater job growth; support investments in public transit and; would not impact surrounding employment uses.

The consulting team engaged by our Client concluded that the expansion of permitted uses to include residential, along with retail/office on the Subject Lands, will fuel the critical mass needed to implement the Region of Peel and City of Brampton vision for this important District.

As noted in the MTSA Report, the Subject Lands are situated within a Major Transit Station Area ("MTSA"), which is required by Provincial Policy to achieve a minimum density target of 150 persons and jobs per hectare. The MTSA currently has a density of approximately 14 persons and jobs per hectare. In our opinion, increased density, along with a provision of residential and employment uses around a proposed MTSA and existing higher-order transit which exists at the intersection of Steeles Avenue East and Bramalea Road will lend support for the major financial contribution made by the government to the Steeles Avenue BRT, including the new multi-level parking structure located at the Bramalea GO Station.

Finally, a conversion will support the development of a robust, multi-faceted complete community, delivering additional services and facilities to the existing residents living in the vicinity of the Bramalea GO Mobility Hub. Increasing the scope and breadth of office and retail uses will expand goods, services, and employment opportunities for existing and proposed residents.

We appreciate your consideration and look forward to working with Regional Staff on the conversion issue and ultimately the re-designation and re-development of the Subject Lands through the MCR process.



Should you have any questions, please do not hesitate to contact the undersigned.

Yours Very Truly,

Delta Urban Inc.


Mustafa Ghassan

C.c. Adrian Smith, Region of Peel
Duran Wedderburn, Region of Peel
Claudia LaRota, City of Brampton
Sajjad Ebrahim, Lark Investment Inc.
Michael Gagnon, Gagnon Walker Domes Ltd.

Attached:

- Map A – Subject Properties in reference to Bramalea GO
- Map B – Draft Schedule Y-6

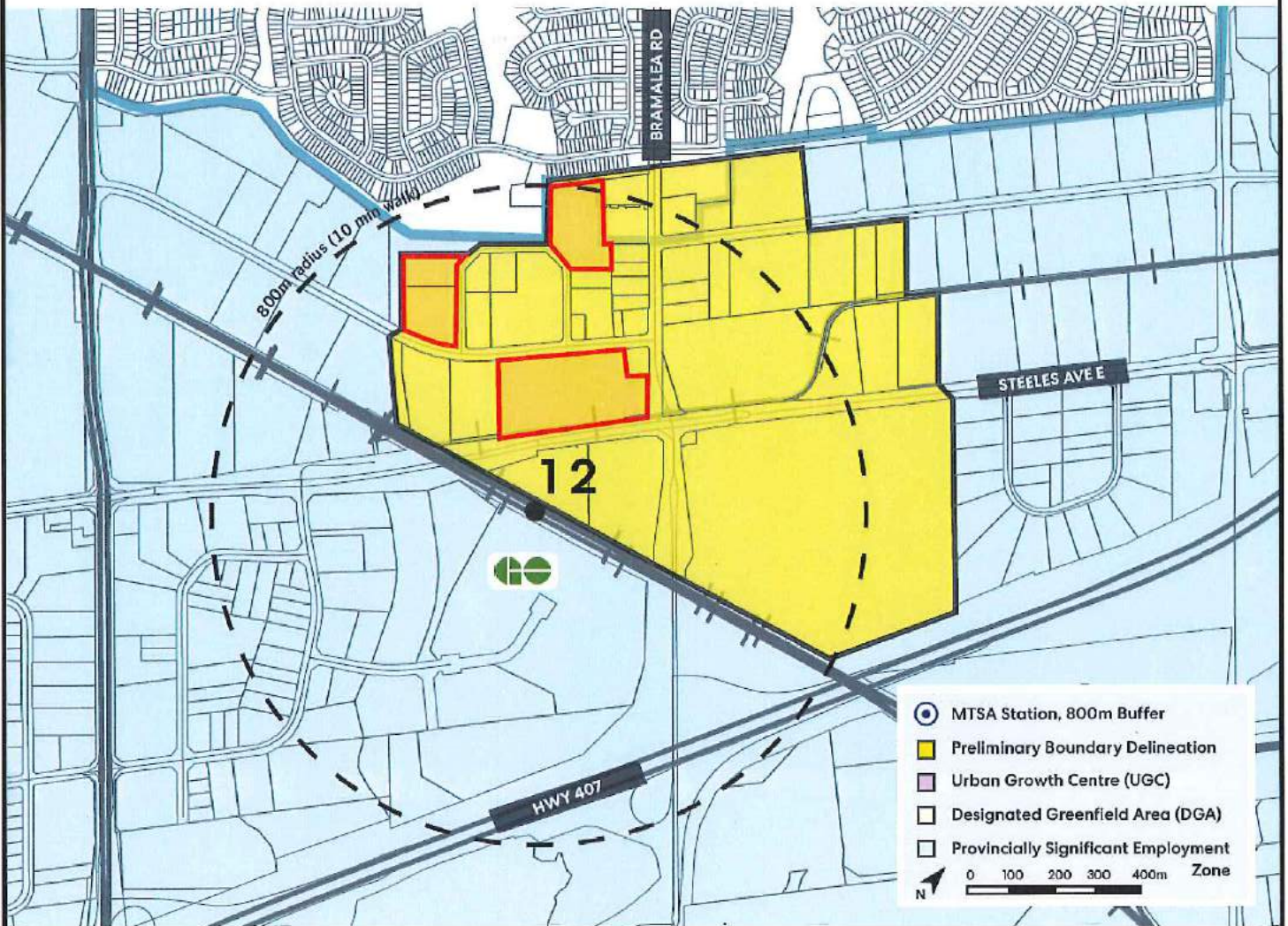
MAP 'A'

 Lark Properties


12 / BRAMALEA GO

APRIL 16, 2020

 Region of Peel
working with you



MTSA Preliminary Boundary Delineation

Area (ha)	113
Population	89
Employment	1,488
Total Density (ppj/ha)	13.9
Additional People and Jobs to Achieve Target Density (ppj)	15,400
MTSA 800m Radius 	
Area (ha)	201
Population	192
Employment	3,368
Total Density (ppj/ha)	17.7

Station:	Bramalea GO	Corridor Type:	Priority Transit Corridor
Municipality:	City of Brampton	Combined Station:	n/a
Corridor:	Kitchener GO	Target Density:	150 ppj/ha

ANALYTICAL LENS

MOBILITY

- Limited Potential
- ZUM BRT service along Steeles Ave
- Planned RER service to Bramalea GO Station

MARKET AND GROWTH POTENTIAL

- Low current development activity
- Limited vacant land, small parcel size

LAND USE AND BUILT FORM

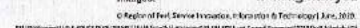
- Moderate flood risk
- GP Built Up Urban Area, Pearson Airport Operating Area, Provincially Significant Employment Zone
- Studies: Brampton Gateway Mobility Hubs and Intensification Corridor, Bramalea GO SP Study

COMMUNITY CONSIDERATIONS

- Lack of community amenities
- Benefit from public realm improvements

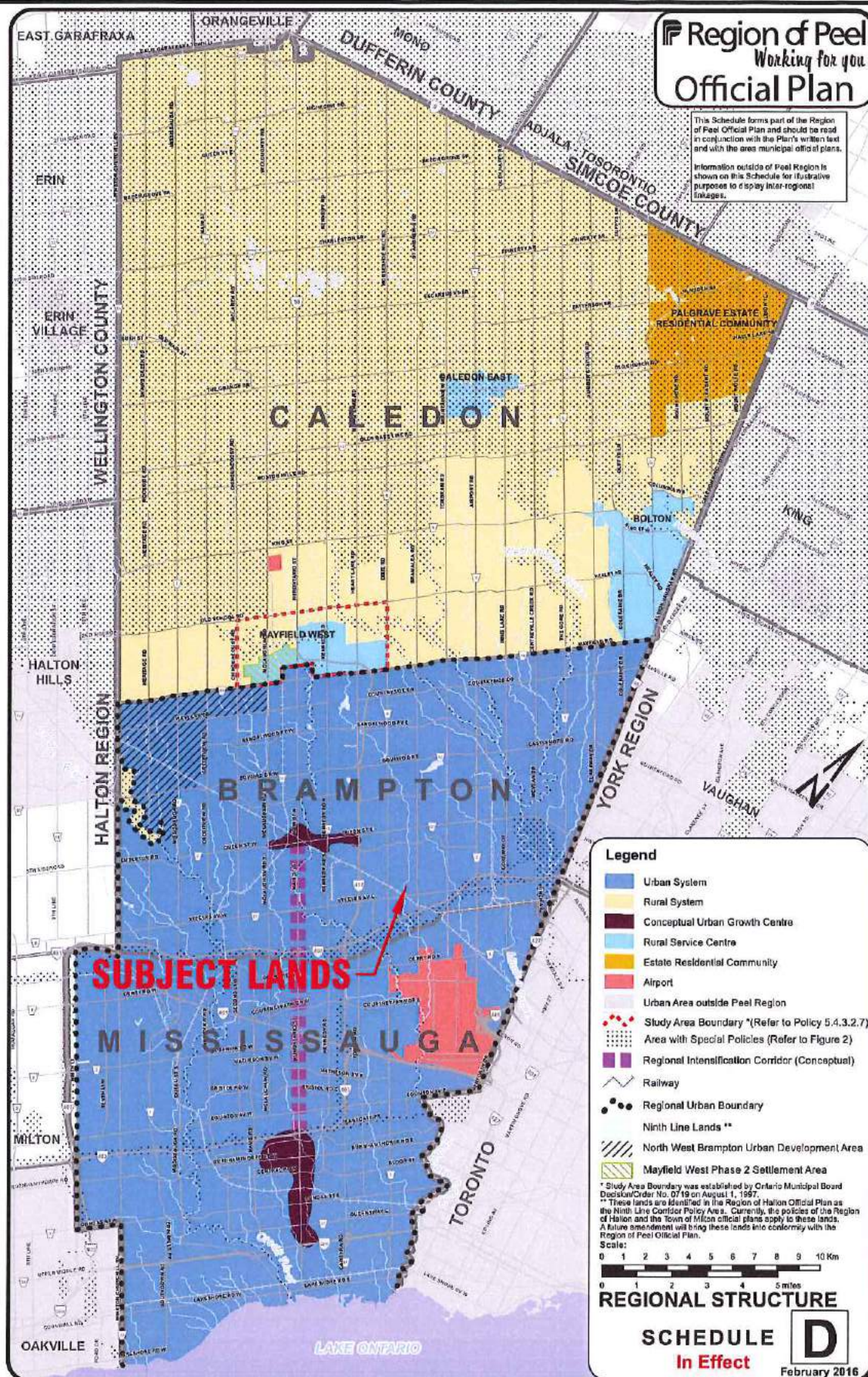
*Data source: Scenario 16, prepared by Hemson Consulting for the Region of Peel (2016 Census Data)

June 2020





APPENDIX 2



REGION of PEEL OFFICIAL PLAN **REGIONAL STRUCTURE** **SCHEDULE D**

P.N.: 92.242

Date: February 23, 2021

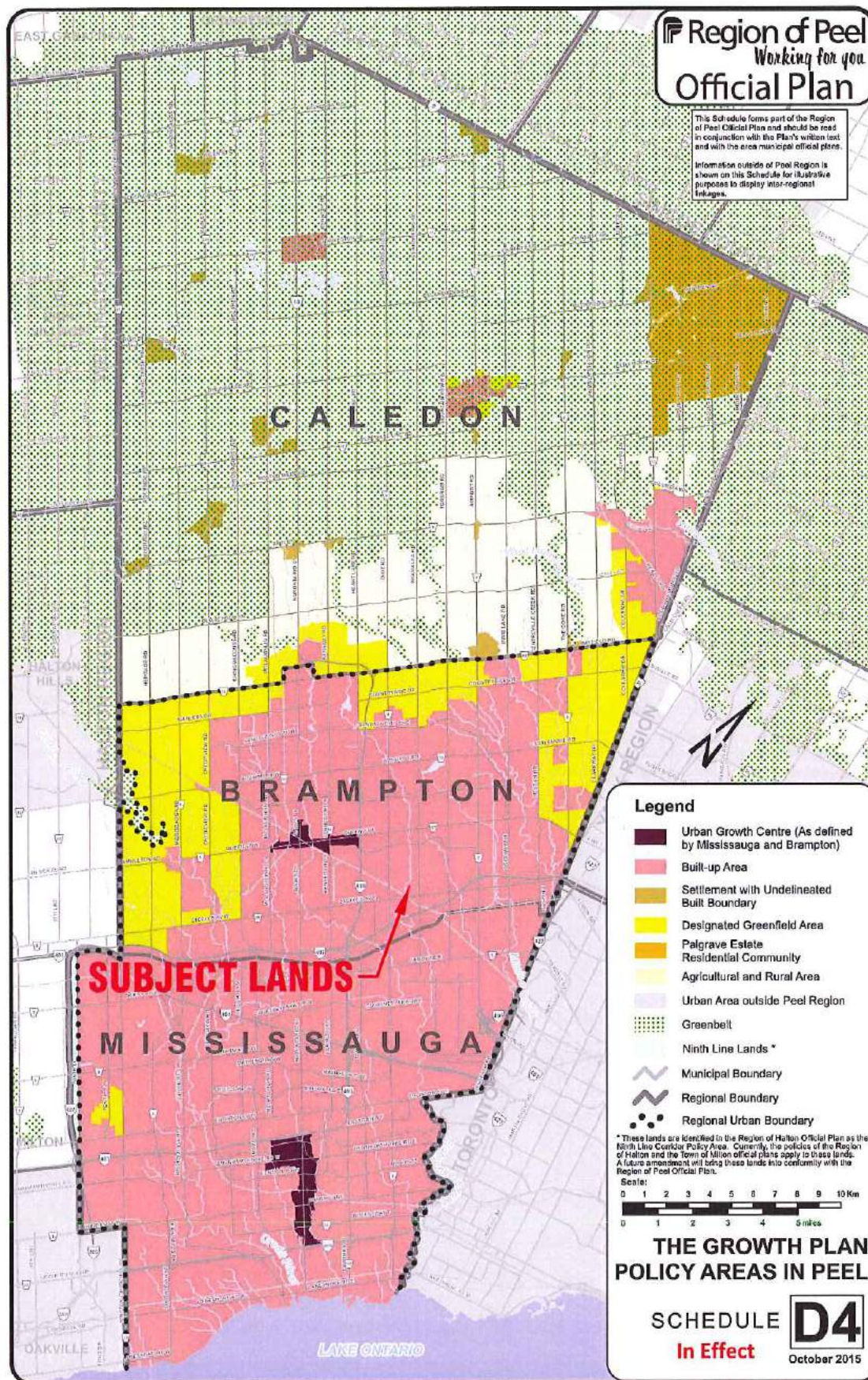
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REGION of PEEL OFFICIAL PLAN THE GROWTH PLAN POLICY AREAS IN PEEL SCHEDULE D4

P.N.: 92.242

Date: February 23, 2021

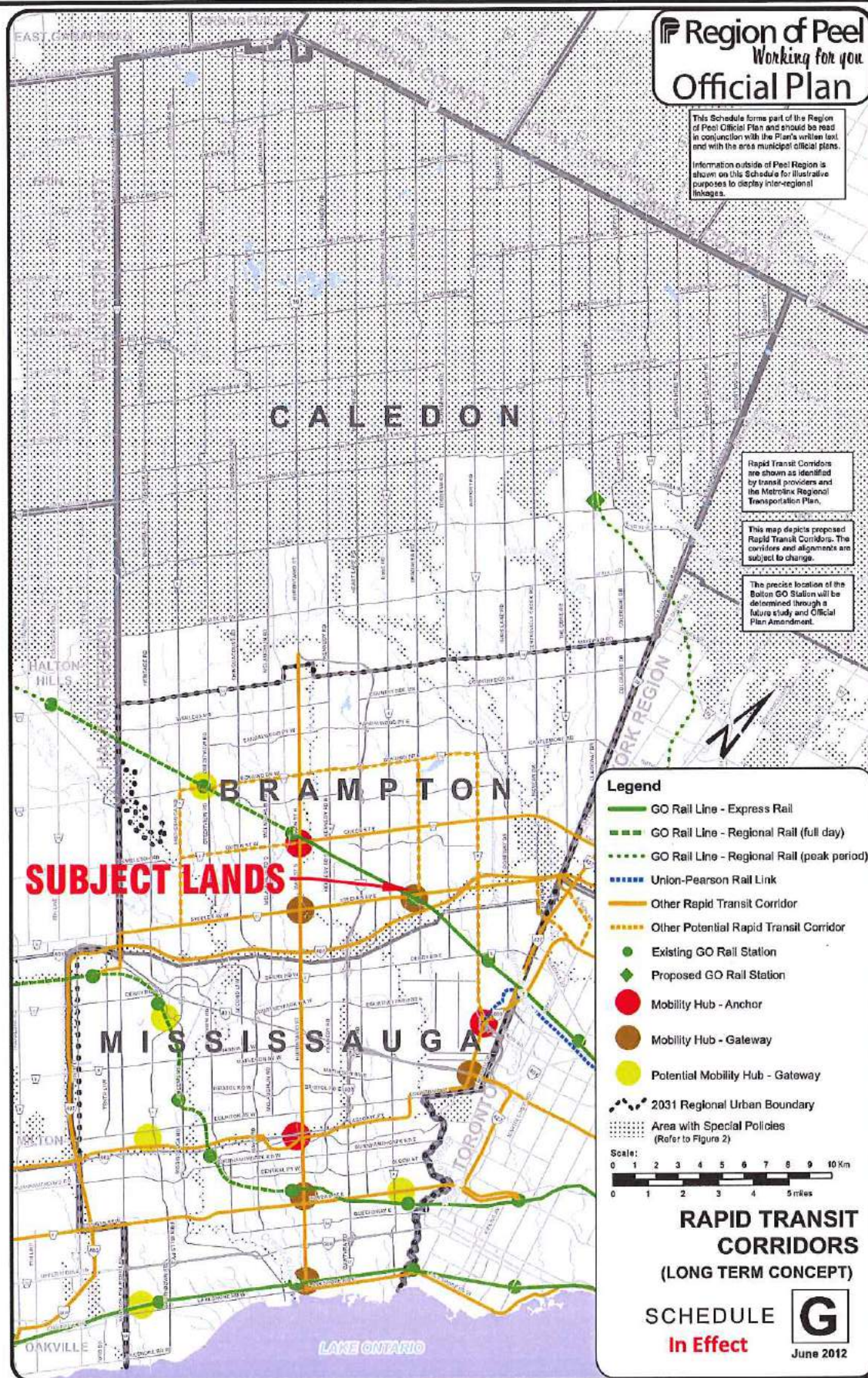
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REGION of PEEL OFFICIAL PLAN **RAPID TRANSIT CORRIDORS** **(LONG TERM CONCEPT)** **SCHEDULE G**

P.N.: 92.242

Date: February 23, 2021

File No.: 242_ROP Schedules.

Scale: N.T.S.

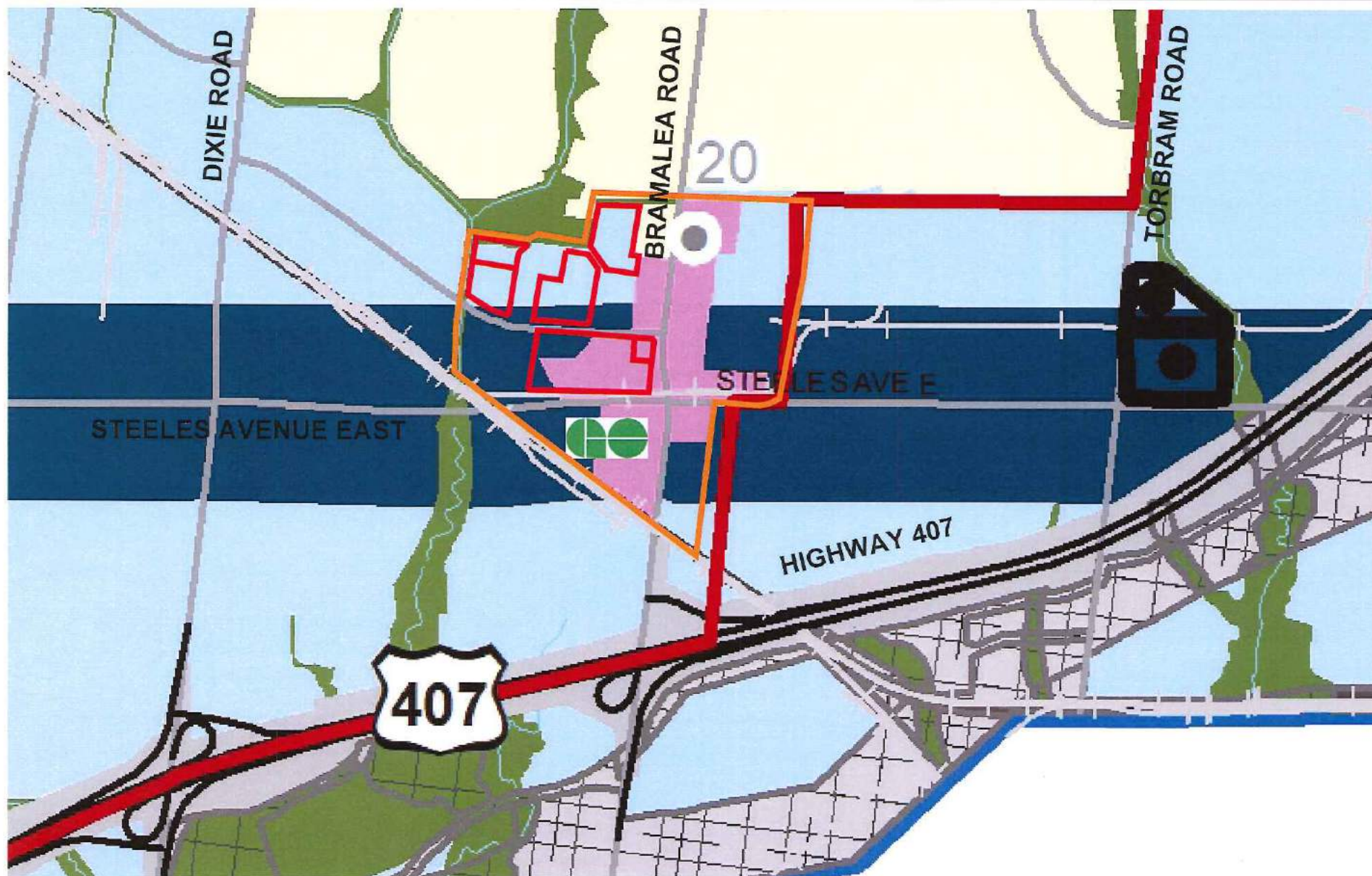
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APPENDIX 3



**EXTRACT from
SCHEDULE A - LAND USE DESIGNATIONS
CITY of BRAMPTON OFFICIAL PLAN**

LEGEND

	SUBJECT LANDS		INDUSTRIAL
	BRAMALEA GO STATION MIXED USE NEIGHBOURHOOD		OFFICE
	RESIDENTIAL		OPEN SPACE
	BUSINESS CORRIDOR		L.B.P.I.A. OPERATING AREA

P.N.: 92.242

Date: May 26, 2021

Scale: N.T.S

Revised:

Drawn By: D.S.

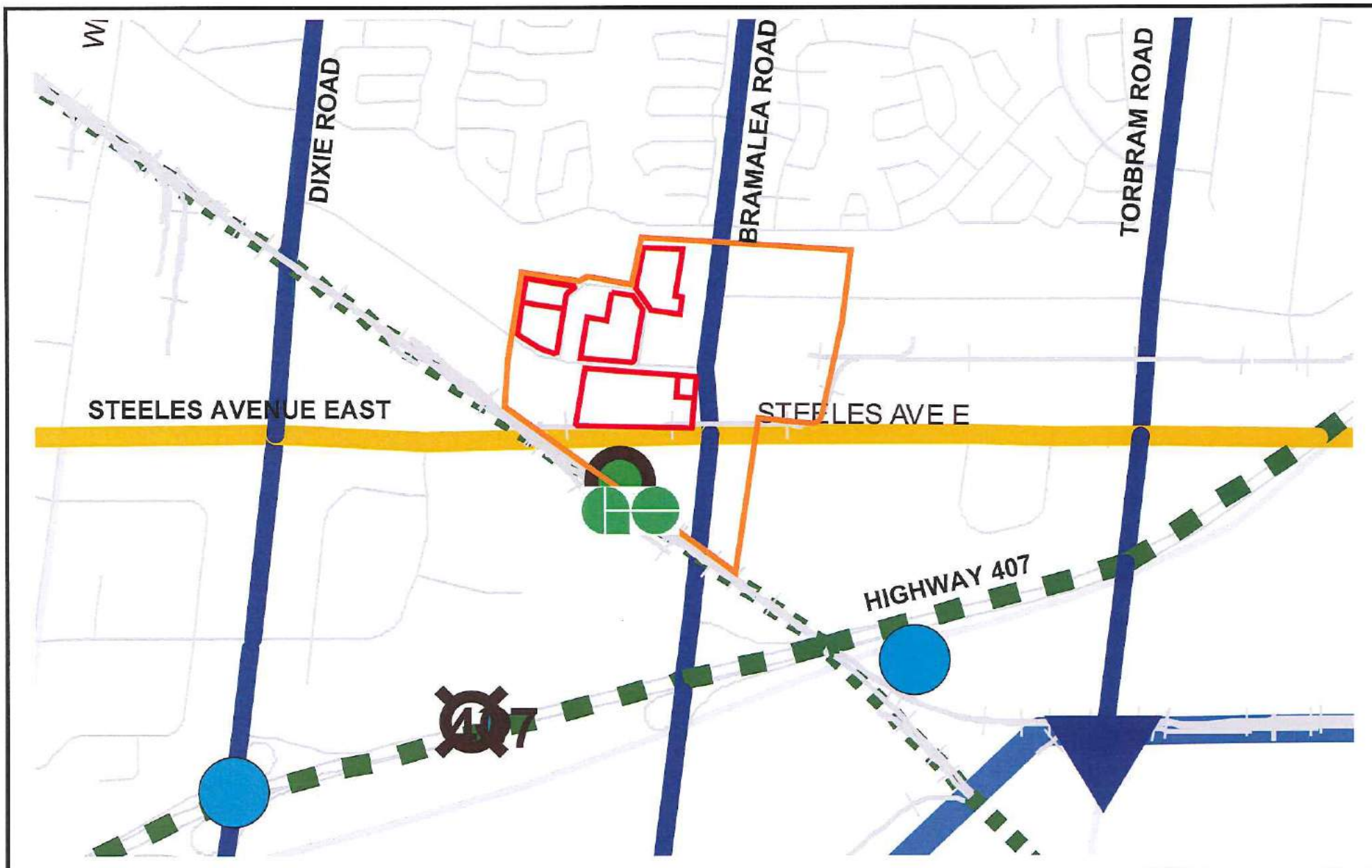
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**EXTRACT from
SCHEDULE C - TRANSIT NETWORK
CITY of BRAMPTON OFFICIAL PLAN**

LEGEND

- | | |
|---|--|
| SUBJECT LANDS | ● GO RAIL STATIONS |
| BRAMALEA GO STATION
MIXED USE NEIGHBOURHOOD | ● MAJOR TRANSIT NODES |
| BRT CORRIDORS | - - - - - GO RAIL |
| PRIMARY
TRANSIT CORRIDORS | - - - - - 407 TRANSIT WAY |
| SECONDARY
TRANSIT CORRIDORS | ● 407 TRANSIT WAY STATIONS |

P.N.: 92.242

Date: September 29, 2021

Scale: N.T.S

Revised:

Drawn By: D.S.

File No.: PN 242_ OP_Figures



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**EXTRACT from SCHEDULE C1
MAJOR PATHWAY NETWORK**

LEGEND

- SUBJECT LANDS
- BRAMALEA GO STATION
MIXED USE NEIGHBOURHOOD
- CITYWIDE PATHWAY NETWORK
- OPEN SPACE IS SHOWN FOR CONTEXT

P.N.: 92.242

Date: September 29, 2021

Scale: N.T.S.

Revised:

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File No.: PN 242_ OP_Figures



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**EXTRACT from SCHEDULE F
INFRASTRUCTURE, UTILITIES and
RESOURCES**

LEGEND

- SUBJECT LANDS
- BRAMALEA GO STATION
MIXED USE NEIGHBOURHOOD
- EXISTING SANITARY TRUNK SEWER
- EXISTING WATERMAIN TRUNKS

WASTE WATER
MANAGEMENT

P.N.: 92.242

Date: September 29, 2021

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Drawn By: D.S.

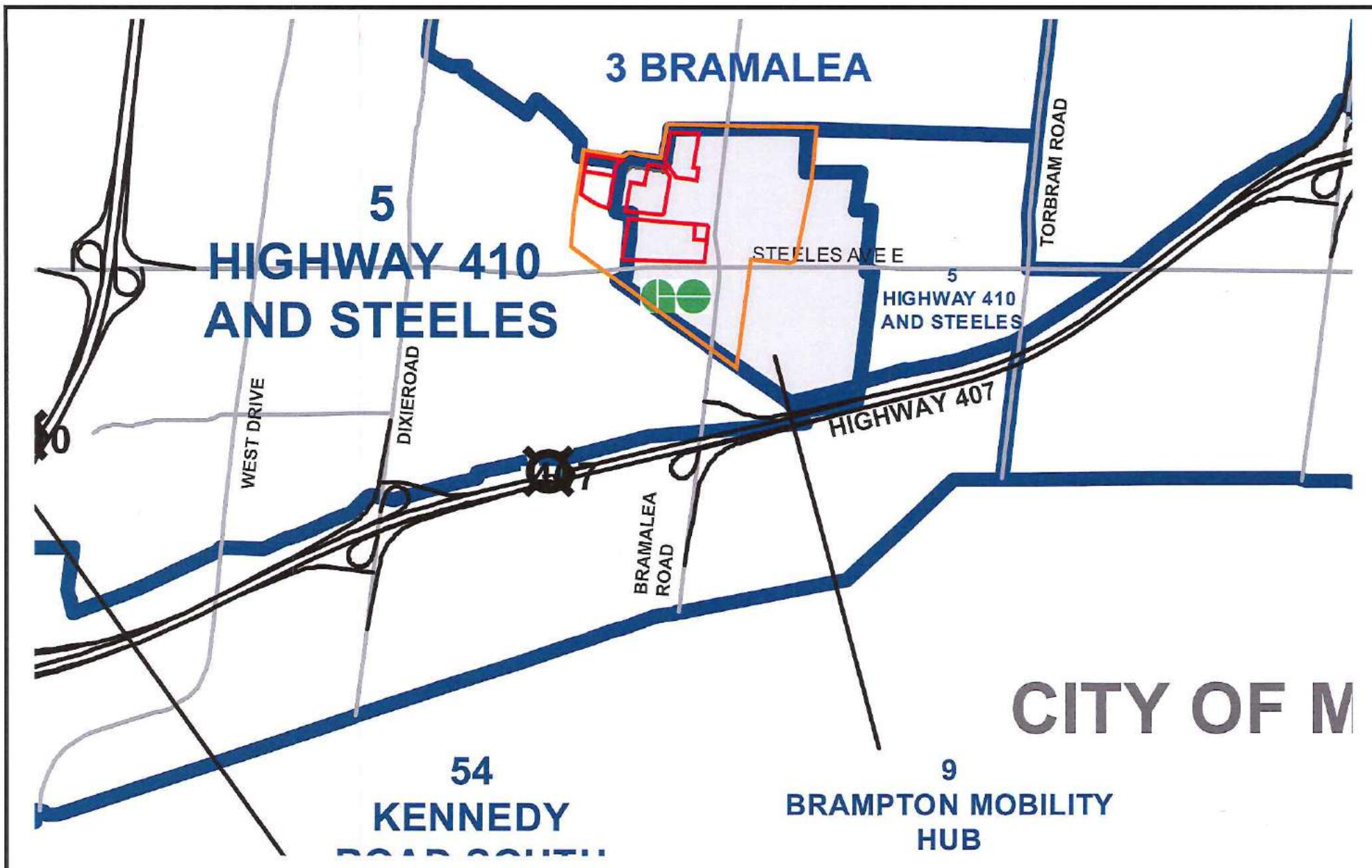
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EXTRACT FROM
SCHEDULE G - SECONDARY PLAN AREAS
CITY of BRAMPTON OFFICIAL PLAN

LEGEND

- SUBJECT LANDS
- BRAMALEA GO STATION MIXED USE NEIGHBOURHOOD

P.N.: 92.242

Date: September 29, 2021

Scale: N.T.S

Revised:

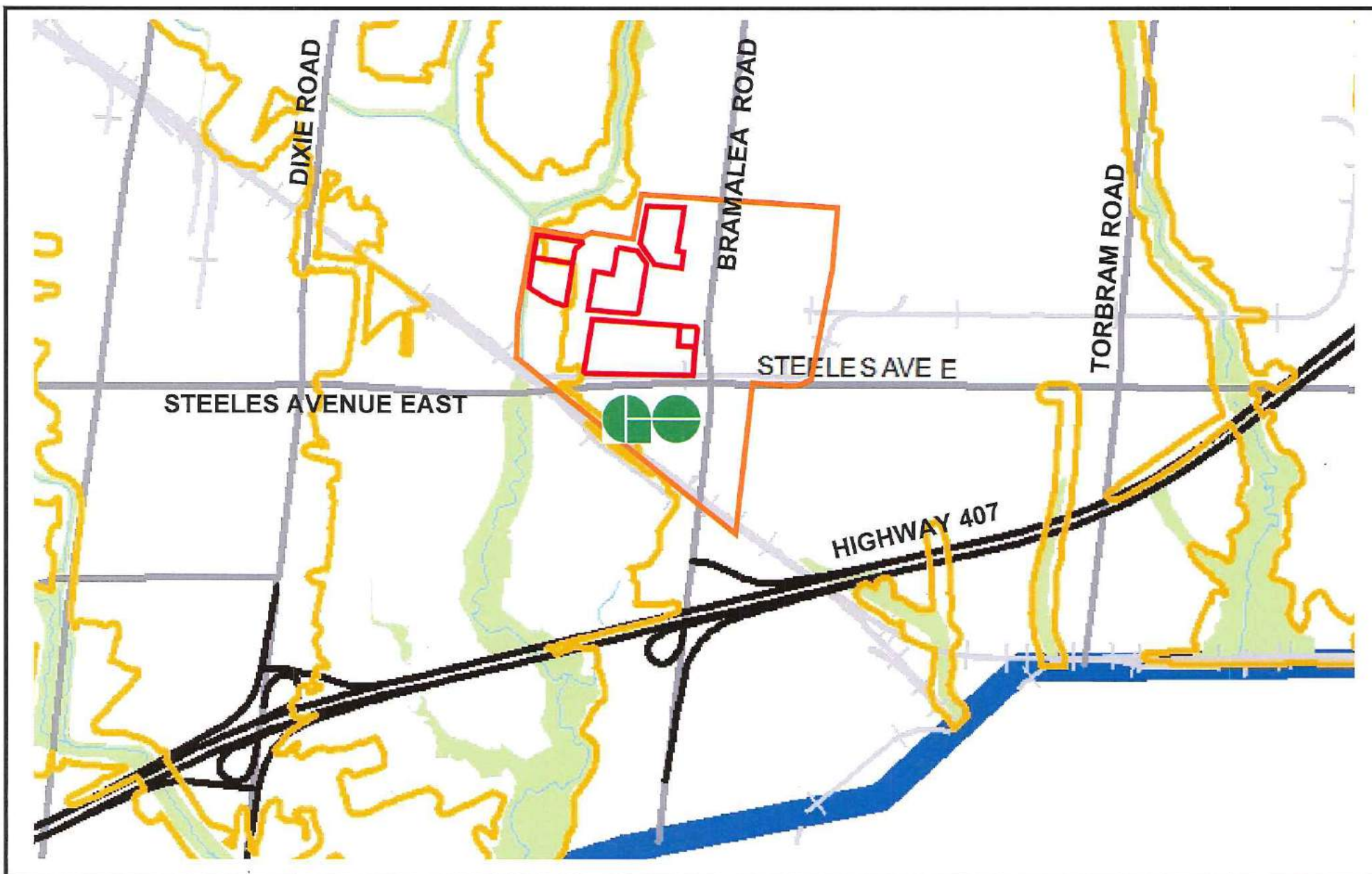
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**EXTRACT from APPENDIX C
DEVELOPMENT, INTERFERENCE
with WETLANDS and ALTERATIONS to
SHORELINES and WATERCOURSES
REGULATION MAPPING**

LEGEND

- SUBJECT LANDS
- VALLEYLAND / WATERCOURSE CORRIDOR
- WATERCOURSES and TRIBUTARIES
- TORONTO and REGION CONSERVATION
AUTHORITY (TRCA) REGULATION (ONTARIO
REGULATION 166/06) AREA

P.N.: 92.242

Date: September 29, 2021

Scale: N.T.S.

Revised:

Drawn By: D.S.

File No.: PN 242_ OP_Figures



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