



February 10, 2023

Mayor and Members of Council  
City of Brampton  
2 Wellington Street W  
Brampton, ON  
L6Y 4R2

Attention: Mr. Peter Fay, City Clerk

Dear Sirs/Mesdames:

**Re: City of Brampton Official Plan Review  
Planning & Development Committee Item 5.2 – February 13, 2023  
City-Initiated OPA – Major Transit Station Areas (City-Wide)  
Preliminary Comments on Behalf of Choice Properties REIT  
Brampton, ON**

**Our File: CHO/BRM/21-02**

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We are the planning consultants for Choice Properties REIT (“Choice”) for the Brampton Official Plan (“OP”) Review process. Choice owns a number of properties throughout Brampton, including the following lands identified within the delineations of Major Transit Station Areas (“MTSAs”), including 379 Orenda Road (the “subject lands”).

The subject lands are currently improved by a significant industrial operation home to Weston Foods, which operates an industrial-scale bakery on the site. The facility provides baked food products to an extensive network of retail and wholesale customers across the GTA. More than 200 jobs are generated by the existing Weston Foods operation.

At this time, Choice does not have specific redevelopment intentions for the subject lands, and seeks to maintain and protect existing operations while allowing for future potential expansions. There is no expectation on the part of either Weston Foods or Choice that this well-established and important industrial employer will vacate the Subject Lands in the foreseeable future.

On behalf of Choice, we have been monitoring the City’s OP Review process and provided comments dated June 3, 2022 related to the first draft release of a new OP. We met with Staff on June 16, 2022 to discuss the contents of our letter, and understand that a number of our comments are being considered by Staff as part of future draft releases.

We understand that the MTSA policies to be heard at Planning Committee on February 13, 2023, are to be adopted on an interim basis in advance of a new Brampton OP being in full force and effect to ensure conformance with the

Region of Peel Official Plan (“ROP”) and Growth Plan as it relates to land use in Brampton’s MTSA’s.

On behalf of Choice, we have outlined our preliminary comments below and will continue to review the draft policies as more information becomes available, and may provide further comments as needed.

## **BACKGROUND**

### **Existing Official Plan Context**

Under the City of Brampton Official Plan, the subject lands are designated as follows:

- Schedule 1 – City Concept as Employment; and
- Schedule A – General Land Use Designations as Business Corridor.

### **Provincial Context**

The subject lands are located within a Provincially Significant Employment Zone (“PSEZ”).

Choice was made aware in late 2021 that the subject lands, and other properties within the vicinity of the Bramalea GO Station, are the subject of a proposed Minister Zoning Order (“MZO”). We are not aware of a decision by the Minister on the proposed MZO as of the date of this letter.

## **PRELIMINARY COMMENTS ON DRAFT MTSA POLICIES**

At this time, our preliminary comments for the Draft OPA are as follows:

- We note that the subject lands are identified within “1. Bramalea GO” Primary Major Transit Station Area, as per Schedule 1B of the Draft OPA;
- Draft Policy 3.2.4 describes the overarching vision for the development of MTSA’s as “vibrant” areas with a high density of people and jobs. The policy goes on to describe specific uses desired around transit stations, such as housing, recreation areas, and commercial amenities. **In our submission, the Policy should be revised to acknowledge that MTSA’s may include employment lands;**
- Draft Policy 3.2.5.1 states “*All development within a MTSA shall generally meet the following objectives: ...*”. In our submission, the “All development” language is not appropriate as there may be additions/expansions of existing buildings or infill buildings on existing sites prior to comprehensive redevelopment, and the language implies that individual developments must provide for all objectives of an MTSA. **For clarity, we suggest that the reference to “All development” be removed, and the policy be revised to read, “MTSA’s shall generally be developed to meet the following objectives: ...”;**

- Draft Policy 3.2.5.2(b) states that area-specific policies for “Primary” MTSAs are to address, “*The minimum, and if required, maximum heights [emphasis added], and Floor Space Index (FSI) for each block within the MTSA*”. We note that under the Notice of Decision for the new Peel Region Official Plan, modifications were made including to Policy 5.6.19.10.e) where the reference to, “*maximum heights may be established at the discretion of the local municipality*” was deleted. Accordingly, **we request clarification as to conformity with the Regional Official Plan in the provision of maximum heights under Draft OPA Policy 3.2.5.2.(b);**
- Draft Policy 3.2.6.2 states, “*A [MTSA Block] Plan may be required to be submitted as part of a development proposal within a “Primary” MTSA in order to provide guidance for the comprehensive development of the entire MTSA...*” With the recognition that under Draft Policy 3.2.4 that MTSAs will transition over time, and in the context of Draft Policy 3.2.7.7 related to providing opportunities for building additions and/or alterations, **we request clarification that MTSA Block Concept Plans will not be required for as-of-right development, and/or infill development prior to comprehensive redevelopment;**
- Draft Policy 3.2.6.3 states, “*If a [MTSA Block] Plan is required, it shall be prepared by the owner and approved by the City prior to the approval of the development application. All costs associated with the Plan and any required accompanying studies are to be borne by the owner.*” **We request clarification as to what is considered “approved”,** and what types of process standards may be applicable to the approval of a MTSA Block Plan, **and suggest that this section should incorporate opportunities to amend a Council-approved MTSA Block Plan in a similar manner as Community Block Plans under the existing Official Plan policies;**
- Draft Policy 3.2.6.5 states that, “*A [MTSA Block] Plan and the accompanying Planning Justification Report may include, but not limited to, the following: ...*”. **For proposed as-of-right development, we request clarification as whether a Planning Justification Report would be required;**
- Draft Policy 3.2.6.6 states, “*The Planning Justification Report required to be submitted in conjunction with the [MTSA Block] Plan shall include the following: ...*” and goes on to provide a list of required components of a report that are only applicable to residential development. In our submission, **we request that “Where residential is proposed,” be added to the beginning of Draft Policy 3.2.6.6 for clarity.**
- Further to Draft Policy 3.2.6.6, **we request that compatibility criteria be added to the list of components of a required Planning Justification Report** to ensure existing employment areas are protected from

- encroachment for consistency with Draft Policy 3.2.5.2(i), and in accordance with Regional Official Plan Policy 5.6.19.10(h); and
- Draft Policy 3.2.7.7 states, *“The redevelopment of existing low-rise employment and commercial uses, may occur gradually over the long-term ... building additions, and/or alterations may be permitted, where it can be demonstrated that they do not preclude the long-term redevelopment of the property as set out in this Plan.”* In our submission, **the policy should include the flexibility to provide for infill development for non-residential uses prior to comprehensive redevelopment at an appropriate and feasible time to allow for increased densities on individual sites.**

We would welcome the opportunity to meet with Staff to discuss our comments further. Please kindly ensure that the undersigned is notified of any further meetings with respect to this matter, as well as notice of the adoption of the Official Plan Amendment.

Yours very truly,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Choice Properties REIT (via email)