



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 Canadian Tire Corporation, Limited  
2021-2111 Steeles Avenue East, 10 and 12 Melanie Drive (1795  
Steeles Ave E)  
Brampton, ON  
Our File: CAT/BRM/15-01**

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We are the planning consultants for Canadian Tire Corporation, Limited (“Canadian Tire”), which is the owner of lands known municipally as 2021-2111 Steeles Avenue East, 10 and 12 Melanie Drive, Brampton (the “Lands”). The Canadian Tire lands of approximately 36.5 ha (90.3 ac) are currently developed with existing buildings including for warehousing and operations, as well as a gas bar with a Pit Stop service station on the Steeles Avenue East frontage.

On behalf of Canadian Tire, we have been monitoring the City’s Official Plan Review and provided comments dated May 31, 2022 and we met with City Staff on June 15, 2022. It is our understanding from Staff Report Planning, Bld & Growth Mgt-2023-074, dated January 3, 2023 that a Major Transit Station Areas Draft Official Plan Amendment (OPA) and associated Draft schedules was released for review and that following the Public Meeting and further analysis of the comments received, Staff will bring forward a recommendation Staff Report for consideration (decision) by Planning and Development Committee and Council. Based upon our review of the Draft OPA, on behalf of Canadian Tire we have preliminary comments as outlined below and will continue to review the Draft OPA in more detail and may provide further comments as required.

## **BACKGROUND**

### **In effect Official Plan**

Under the City of Brampton Official Plan, the Canadian Tire Lands are designated: on Schedule 1 City Concept – Employment, while Bramalea and Steeles are both shown as Primary Intensification Corridors with the lands generally within the Mobility Hub Gateway; and on Schedule A General Land Use Designations – Office at the intersection of Steeles/Bramalea, Business Corridor along Steeles and Industrial to the south, while the lands are predominantly within the LBPIA Operating Area.

Under Secondary Plan Area 9 Bramalea Mobility Hub SP9:

- On Schedules 9(A) and 9(C), the portion of the Canadian Tire Lands known municipally as 2021-2111 Steeles Avenue East is designated Mixed Industrial Commercial with a maximum FSI of 0.5, Mixed Use - Office and Retail with a maximum FSI of 0.6 and Office with a maximum FSI of 3.0, while Special Site Area 2 is applicable to the portion of the subject lands designated Mixed Use - Office and Retail; and
- An All Moves Intersection is shown on the Steeles Avenue East frontage on Schedule 9(B) Transportation Elements.

Under the Highway 410 and Steeles Secondary Plan SP5, the portion of the Canadian Tire Lands known as 10 and 12 Melanie Drive is designated General Employment 2. Note that Special Site Area 11 is still shown as applicable to a portion of the subject lands known municipally as 2021-2111 Steeles Avenue East (related to Policy 6.11).

### **Redevelopment Plans – First Phase Application for Site Plan Approval**

Canadian Tire are planning the redevelopment of the lands as the former warehouse use has moved to a new facility in Caledon. On October 12, 2022 an application for Site Plan Approval (City File no. SPA-2022-0185) was submitted for a first phase of redevelopment for warehousing uses (with office components) on an approximately 33.5 ha (82.7 ac) portion of the lands. A second phase for future development is planned for an approximately 3.2 ha (8.0 ac) portion of the Lands in proximity to the Bramalea and Steeles intersection, which is intended for office, retail and commercial uses.

### **Minister’s Zoning Order Resolution Request**

On October 25, 2021, the Council of the Corporation of the City of Brampton passed resolution C349-2021 related to the “Minister’s Zoning Order Resolution Request – Lark Investments” for lands including a portion of the Canadian Tire Lands. As per Council resolution C411-2021, the MZO Boundary was extended to reflect the entirety of the Canadian Tire Lands to facilitate the redevelopment including for warehouse uses.

### **DRAFT OPA**

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

- Based on our review of Draft OPA Schedule 1B, the portion of the Canadian Tire Lands known municipally as 2021-2111 Steeles Avenue East is shown within the “1. Bramalea GO” Primary Major Transit Station Area, while a portion of the Canadian Tire Lands is within the “25. Torbram Road/407” Planned Major Transit Station Area;
- Draft Policy 3.2.4 describes the overarching vision for the development of MTSA 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 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, “MTSAs 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.

In addition, 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.**



Jonathan Rodger, MScPI, MCIP, RPP  
Principal Planner

cc. Canadian Tire Corporation, Limited (via email)  
Davis Webb LLP (via email)  
Michelle Gervais, City of Brampton (via email)