



July 28, 2023

City of Brampton  
Planning, Building & Economic Development Department  
2 Wellington Street West  
Brampton, ON, L6Y 4R2

Attn: Michelle Gervais, Policy Planner, Integrated City Planning

**Re: Kaneff Comments - "Primary" Major Transit Station Area Preliminary Land Use Plan - Gateway Terminal MTSA**

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Dear Ms. Gervais,

We appreciate the opportunity to provide comments on the Preliminary Land Use Plan for the Gateway Terminal Major Transit Station Area (MTSA) and corresponding City-initiated Official Plan Amendment.

Kaneff Properties Limited is the registered owner of the lands municipally known as 210 & 220 Steeles Avenue West, 1 Steeles Avenue East, and 1 Bartley Bull Parkway located within the Gateway Terminal MTSA. We currently have an active development application under review for our property located at 210 & 220 Steeles Avenue West to rezone our lands to permit high-density residential land uses and new purpose-built rental apartment buildings ranging in height from 6 to 39 storeys (City File: OZS-2022-0023). A resubmission for our application will be made in August 2023 in response to staff comments and feedback received on our first submission. The revised development concept plan contemplates high-density residential land uses on both properties, which conforms with the current Official Plan and Secondary Plan designations and policies that apply to these lands.

According to the Preliminary Land Use Plan for the Gateway Terminal MTSA dated May 2023, our 210 Steeles Avenue West property is proposed to be designated as "Mid-Rise Mixed-Use" (see Appendix 1). This property current contains an existing 22 storey residential apartment building, which is a built form that is not consistent with the proposed Mid-Rise Mixed-Use designation. We would respectfully request that the preliminary land use designation for 210 Steeles Avenue West be revised to "High-Rise Mixed Use" for consistency with the existing planned context and proposed high-density residential land uses contemplated by our corresponding rezoning application.

Furthermore, our lands located at 210 & 220 Steeles Avenue West are currently split between two Secondary Plan Areas. 210 Steeles Avenue West is currently designated "High Density Residential" according to Schedule 6 of the Brampton Flowertown Secondary Plan, whereas 220 Steeles Avenue West is currently designated "Residential - High Density One" according to Schedule SP55(a) of the Hurontario Main-Corridor Secondary Plan. Our current Zoning By-law





Amendment application for these lands was prepared to conform with both land use designations and it has been confirmed by staff that an Official Plan Amendment is not required. According to the City's Official Plan, this particular area of Uptown Brampton is planned to accommodate intensive, mixed-use development at higher densities supported by the City's highest level of transit service. The proposed land use and density contemplated by our rezoning application for these lands conforms with the policies for both residential high-density designations and is characteristic of a compact and efficient built form that will help to realize the vision for transit-oriented and sustainable development.

Further to the above, we respectfully request that the proposed City-initiated Official Plan Amendment modify the boundaries of the Hurontario-Main Corridor Secondary Plan (Area 55) to include our property at 210 Steeles Avenue West. Both Kaneff owned properties at 210 & 220 Steeles Avenue West contain an existing 22 storey residential apartment building. The assigned land use designations and policy framework should be consistently applied to both properties. This division between the two Secondary Plans has created confusion in the past with the interpretation and application of specific policies and zoning requirements. For example, By-law 45-2021 amended the parking requirements for lands located within the Hurontario-Main Corridor Secondary Plan to eliminate minimum parking standards and introduce a new visitor parking ratio of 0.20 spaces per apartment dwelling unit. As a result of the boundary division of the two Secondary Plans, these special parking provisions apply to 220 Steeles Avenue West but do not apply to 210 Steeles Avenue West.

We are confident that the intensification of our properties within the Gateway Terminal MTSA will introduce a compact and efficient built form that will help to realize the planning vision for transit-oriented communities and a sustainable city structure. Furthermore, we would like to express our support for the City of Brampton's efforts to transform the MTSA's within Brampton into healthy, sustainable, and transit-oriented communities.

We appreciate the opportunity to provide our comments on the Preliminary Land Use Plan for the Gateway Terminal Major Transit Station Area (MTSA). We look forward to our continued participation and collaboration with the project team throughout this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Freeman".

**Kevin Freeman, MCIP, RPP**

Director of Planning & Development

Kaneff Group

[kfreeman@kaneff.com](mailto:kfreeman@kaneff.com)



Archived: 2023/08/03 9:21:21 AM  
From: Mark McConville  
Sent: Thu, 27 Jul 2023 19:09:54 +0000ARC  
To: Gervais, Michelle  
Subject: [EXTERNAL]Inquiry - Brampton GO Major Transit Station Areas (MTSA) - 150 Main Street North: N-E Corner of Main and Church St.  
Sensitivity: High

Caution: This email originated from outside the organization. Do not click links or open attachments that you do not trust or are not expecting.

Hi Michelle,

I have reviewed the Preliminary Plan for the Brampton Go MTSA. I see the City changed the lands on the west side of Main St. across from 150 Main Street North from DPS Area to Downtown Mixed Use 2 (High Rise). The City also changed the residential lots east and south of the site to Downtown Mixed Use 3 (Mid Rise) designation, but left 150 Main Street North itself as DPS Area; see extract of the Plan below.



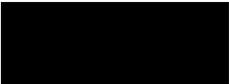
I am trying to understand the rationale of why the City would not propose a Downtown Mixed Use 2 or 3 for 150 Main Street North. Is this just an oversight or does this have to do with the heritage site to the north? If it is due to the latter reason, I do not understand why the lots to the east would be proposed to be redesignated to Downtown Mixed Use 3, as they are also immediately adjacent to the same heritage site.

Rather than simply restrict height, policies can be proposed to ensure compatible architectural façade treatments that resemble similar heritage attributes in order to complement any adjacent heritage resources, but not permitting the increased in density and height because a heritage site is adjacent may be detrimental in the City achieving the required minimum density target for this MTSA, which is the highest target in the City. The redesignation of this site in my opinion is an appropriate opportunity for greater intensification, given the proposed surrounding designations and the fact there is no heritage resources on the site itself.

Can you please give me a call at [REDACTED] to discuss further?

Best Regards,

Mark McConville, M.Sc.Pl, MCIP, RPP  
Director of Planning



July 31, 2023

GWD File: PN.23.3215.00

The Corporation of the City of Brampton  
2 Wellington Street West  
Brampton, Ontario  
L6Y 4R2

**Attention: City of Brampton Planning & Development Committee**

**Subject: Public Input – Letter of Concern  
Item 7.11 - Recommendation Report – “Primary” Major Transit Station  
Areas – Preliminary Land Use Plans, City-wide; July 31, 2023 Planning  
and Development Committee  
Draft Gateway Station MTSA Land Use Plan  
Choice Properties Limited Partnership and Loblaws Properties  
Limited**

Gagnon Walker Domes Ltd. (“GWD”) acts as Planning Consultant to Choice Properties Limited Partnership and Loblaws Properties Limited (collectively “Choice/Loblaws”), the registered owner of the property municipally known as 85 Steeles Avenue West in the City of Brampton (“Subject Site”). The Subject Site is located at the southwest quadrant of Hurontario Street/Main Street and Steeles Avenue and is located within the Regionally approved Gateway ‘Primary’ Major Transit Station Area (“MTSA”). The Subject site is currently developed with a 7,432 m<sup>2</sup> (80,000 ft<sup>2</sup>) grocery store, however that portion of the lands located to the south of Lancashire Lane are vacant. Choice/Loblaws are currently assessing the existing and future use of the Subject Site.



We write to express Choice/Loblaws’ concerns regarding:

- (1) the City’s approach to seeking Committee/Council endorsement in principle of the Draft MTSA Land Use Plans in the absence of a related detailed policy framework, and
- (2) the potential implications of the Draft Gateway Station MTSA Land Use Plan on the Subject Site.

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## **The Draft MTSA Land Use Plans Should be Considered with Applicable Policies**

We understand that the City Planning Department Recommendation Report seeks Council endorsement in principle of numerous Draft MTSA Land Use Plans, including the Draft Gateway Station MTSA Land Use Plan, prior to the preparation of detailed policy associated with these Draft MTSA Land Use Plans.

Choice/Loblaw's has a fundamental concern about the prematurity of any City Council endorsement or adoption of the applicable Draft MTSA Land Use Plan in the absence of any related associated policy/development framework. In the absence of any specific land use and development planning policy, it is not possible for Choice/Loblaw's to review, assess and provide meaningful input on the Draft Gateway Station MTSA Land Use Plan in the context of the existing and/or future use of the Subject Site, or opine on the Draft MTSA Land Use Plan's consistency with/conformity to Provincial, Regional and City policies/plans.

### **Concerns Regarding Draft Gateway Station MTSA Land Use Plan**

Notwithstanding the challenge of considering the Draft MTSA Land Use Plans in the absence of related policies, GWD has reviewed the Draft Gateway Station MTSA Land Use Plan recently made available on the City of Brampton website (enclosed). Based on our review of this Draft MTSA Land Use Plan, we offer the following comments and recommendations on behalf of Choice/Loblaw's:

#### ***1. Proposed Land Use Designation***

The Subject Site is proposed to be designated 'High-Rise Mixed-Use', 'Mid-Rise Mixed-Use' and 'Mid-Rise Residential' pursuant to the Draft Gateway Station MTSA Land Use Plan.

While it appears the majority of the Subject Site has been designated to permit high-rise and mid-rise development, it is not possible to assess the appropriateness of the proposed land use designations within the Draft Gateway Station MTSA Land Use Plan in the absence of detailed policies associated within the proposed land uses; including, but not limited to policies related to the permissions or restrictions concerning existing or new proposed low-rise, stand-alone commercial buildings (i.e. grocery stores).

Prior to any consideration of potential land use designations within the Gateway Station MTSA, associated detailed draft planning policies must be provided for review and comment.

#### ***2. Proposed Public or Private Street Network***

The Draft Gateway Station MTSA Land Use Plan identifies a 'Proposed Public or Private Street Network' on the Subject Site.



Insufficient information has been made available to understand the policy and/or development framework associated with any identified Proposed Public or Private Streets; including, but not limited to: policy flexibility regarding the location and configuration of any public/private streets, phasing, cross-section details and the criteria to which they are to be provided as private or public.

Further, no technical justification has been provided to rationalize the location and configuration of the Proposed Public or Private Street Network within the Subject Site.

### **3. *Mid-Block Connections***

Three (3) 'Mid-Block Connections' are identified on the Subject Site. No details or draft policies are provided to determine their intended function, design and ownership.

### **4. *Height Transition Area***

A 'Height Transition Area' overlay has been applied along the south limits of the Subject Site. Similar to the above, no policy framework has been advanced to clarify the intent of this proposed overlay, or to enable Choice/Loblaw's to assess its potential impact on the Subject Site.

### **5. *Existing Active Transportation Link***

The Draft MTSA Land Use Plan identifies an 'Existing Active Transportation Link' between Tina Court and Lancashire Lane through the south portion of the Subject Site. At this time our Clients are not aware of any legal agreement(s) that formally permit a publicly accessible active transportation/trail link through these private lands, and accordingly this should be deleted.

## **Closing Remarks**

Choice/Loblaw's does not support the recommendations of the City's Planning Department as identified in its May 19, 2023 Report entitled "Recommendation Report – "Primary" Major Transit Station Areas – Preliminary Land Use Plans, City-wide"; including, but not limited to the Staff recommendation that the Draft MTSA Land Use Plans be endorsed in principle at this time.

On behalf of Choice/Loblaw's we request that the City defer any consideration of the Draft MTSA Land Use Plans until such time as a detailed draft policy framework has been prepared. In our view, the Draft MTSA Land Use Plans can only be considered together with the associated policy framework.

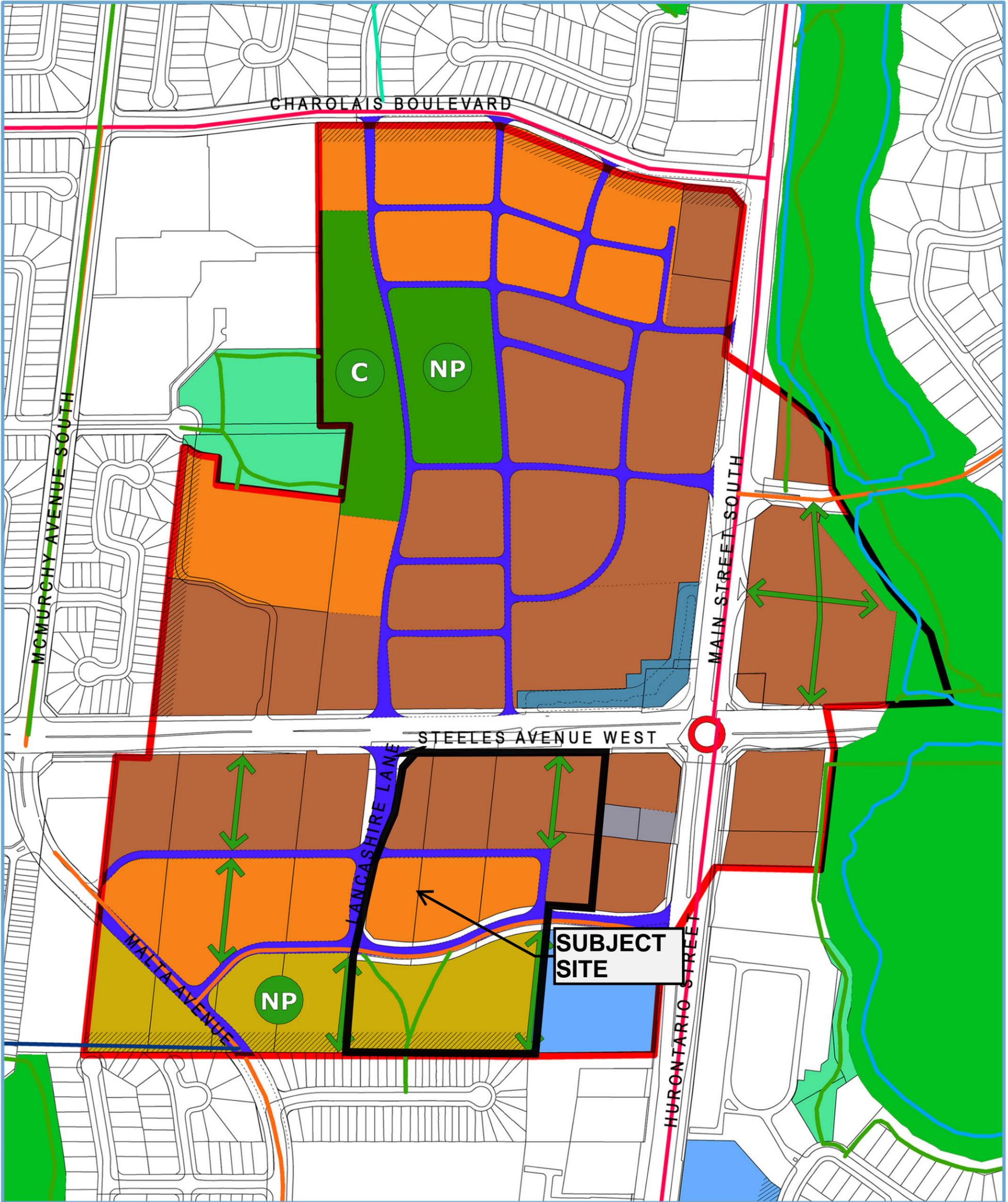
We would welcome opportunity to meet with City Staff to further discuss its concerns. Choice/Loblaw's reserve the right to provide additional further comments.



Yours truly,

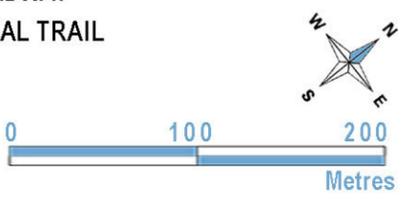
**Richard Domes, B.A., C.P.T**  
**Principal Planner**

cc: Choice Properties Limited Partnership  
Loblaws Properties Limited  
M. Gagnon/ N. Dawan, Gagnon Walker Domes Ltd.



## LEGEND

- |                        |   |   |
|------------------------|---|---|
| MID-RISE RESIDENTIAL   | PROPOSED PUBLIC OR PRIVATE STREET NETWORK | EXISTING ACTIVE TRANSPORTATION NETWORK LINK |
| MID-RISE MIXED-USE     | MID-BLOCK CONNECTION                      | PROPOSED PROTECTED BIKE LANE OR CYCLE TRACK |
| HIGH-RISE MIXED-USE    | PROPOSED OPEN SPACE                       | PROPOSED BIKE LANE OR BUFFERED BIKE LANE    |
| OFFICE MIXED-USE       | NATURAL HERITAGE SYSTEM                   | PROPOSED SHARED ROADWAY                     |
| TRANSIT STATION        | EXISTING OPEN SPACE                       | PROPOSED RECREATIONAL TRAIL                 |
| UTILITY                | MTSA BOUNDARY                             | TRCA FLOODLINE                              |
| PROPOSED PARK          | MTSA STATION                              | HEIGHT TRANSITION AREA                      |
| PROPOSED COMMUNITY HUB |   |   |



POLICY PLANNING | PLANNING, BUILDING AND ECONOMIC DEVELOPMENT | CITY OF BRAMPTON

# BRAMPTON MAJOR TRANSIT STATION AREAS GATEWAY STATION DRAFT LAND USE PLAN

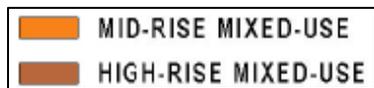
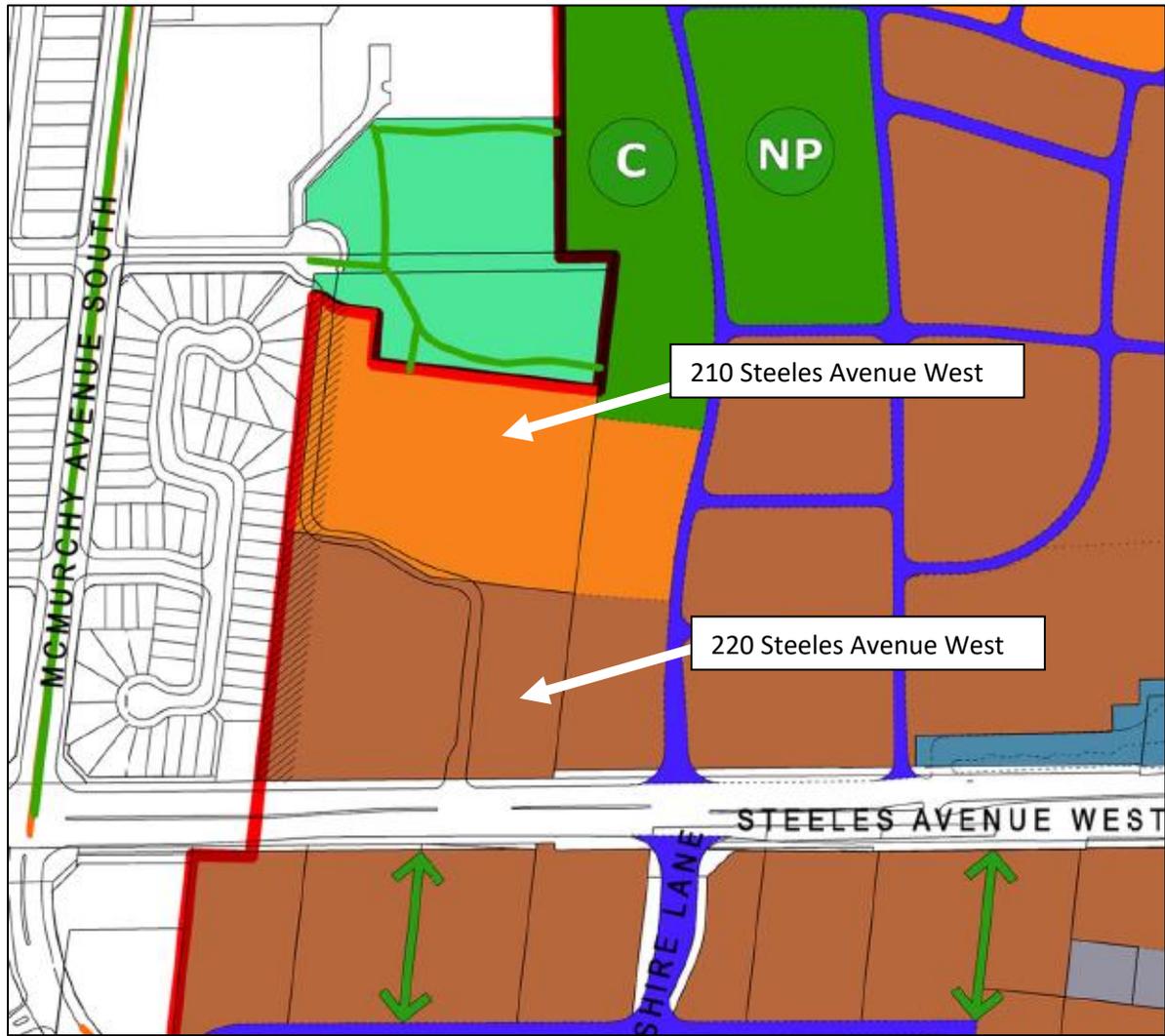
DRAFT FOR DISCUSSIONS ONLY

MAY 2023

# MTSA Land Use Plan

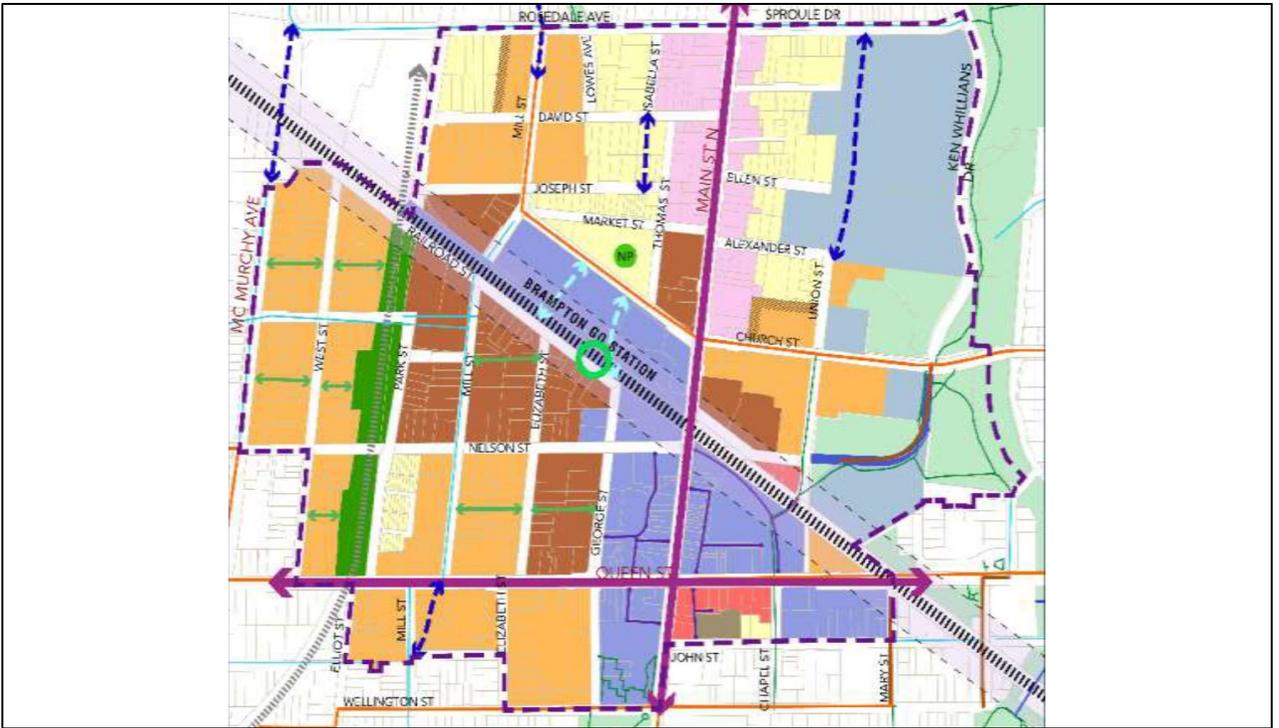
A Day Late, a Dollar Short

## Appendix 1: Excerpt from Gateway Station Draft Land Use Plan - 210 & 220 Steeles Avenue West



## Failure to meet provincial targets

- Provincial target for Brampton: 113,000 units from 2021-2031
  - 6153 starts from Jan 2021-Jun 2023
  - New annualized target to meet goal by 2031: 14,000+ per year
- MTSA estimated yield: 78,830 by 2051
  - Maybe ~3k units per year by conservative estimates
  - Max ~6k per year by generous estimates
- Best case scenario, less than 50% of growth met by MTSA's
  - Remaining MTSA's have limited residential capacity



The City is still planning for there to be low density across the street from the GO station, how is this reasonable? The low density north of the CN corridor can support significantly more population, and failure to include this in planning runs the risk of undersizing pipes, stalling further development.



It is 1.1 kilometres from Church and Sophia Street to the Brampton GO station, this is a straight line on what the City has planned to be bike lanes. This is an easy bike ride to a GO station, and as such, it should be more than low density. It is also still well within walking distance of the Queen Street BRT line.



It is 1.6 kilometres from Kennedy Road to the Brampton GO station along Church street, a bike corridor, this is still an easy ride, and it will be close to the intersection of Kennedy and Queen, one of the busiest transit interchanges in the City that isn't a transit terminal



Again with the low density, some of these houses are under 200 metres from the rapid transit line, and Rutherford already has bike lanes on it. With how the city is planning the corridor behind the developments on the north side, we could have a nearly continuous corridor from the 410 to the Brampton GO station with dedicated bike infrastructure at a mere 3km ride



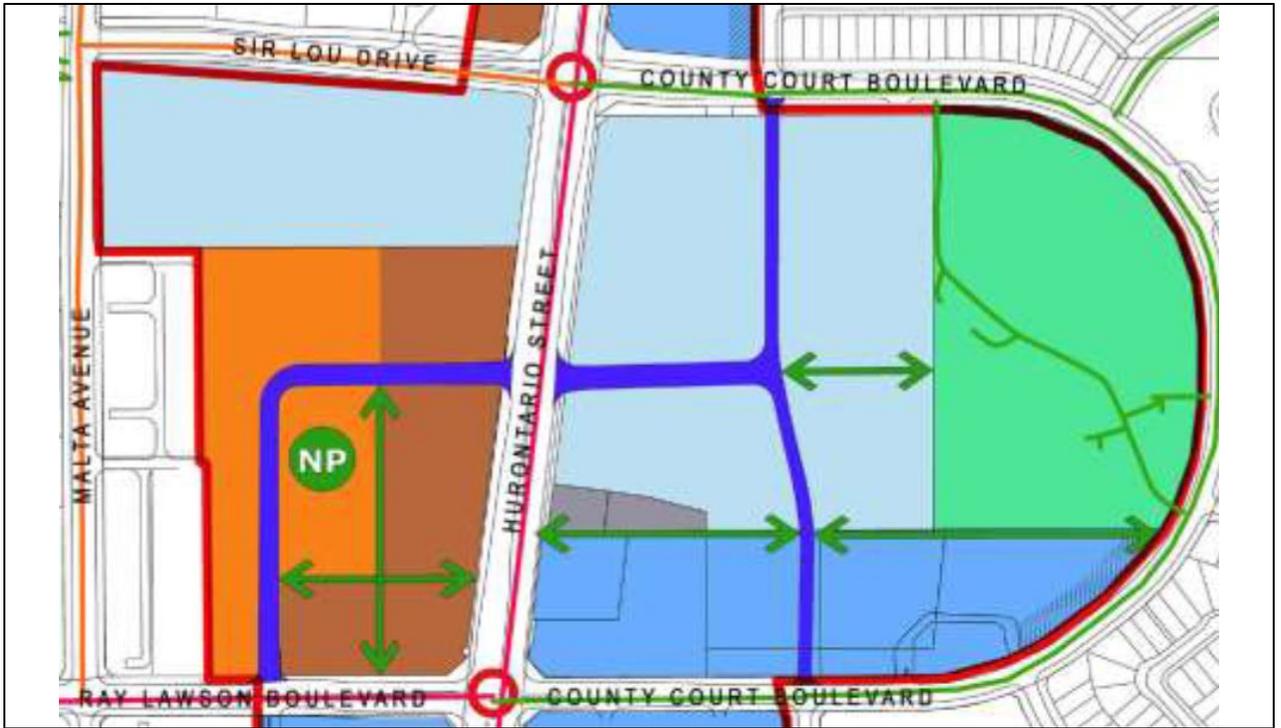
This again shows the City's fundamental lack of big picture thinking, this is a 1 km walk from Bramalea City Centre, which isn't that long, and based on City numbers, it is right by the city's actual central business district. This would be an easy bike ride



Dixie and Queen, while the northeast quadrant would be very hard to redevelop due to how zero lot lines work, the northwest quadrant could easily be redeveloped, and it is very close to a central business district, a highly walkable and bikeable area. This is already effectively a 15 minute neighbourhood due to the services provided at Bramalea City Centre



Queen and Bramalea, this could easily be medium density as long as it is paired with special parking rules of a relatively low max parking, and high bike parking, because it is an easy bike ride to Bramalea City Centre, making it quite suitable as part of a 15 minute neighbourhood.



This is a bit of a different complaint, Peel Police is working on relocating the police station from here to Mississauga Road and Steeles, and the site should be redeveloped. With a large parcel adjacent to a rapid transit stop under construction, this could easily fetch a handsome price on the market if the OPA/ZBA was done ahead of time, the site will also be an easy bike ride from the Uptown Core via Malta Avenue on bike lanes.