



Principals

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

Attention: Steve Ganesh, Commissioner, Planning, Building and Growth
Management
Michelle Gervais, Policy Planner
Claudia LaRota, Supervisor/Principal Planner

Subject: Public Input – Letter of Concern
Brampton Major Transit Station Areas
Draft Bramalea GO Station MTSA Land Use Plan
10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road,
and 24 Bramalea Road – Lark Investments Inc.

Gagnon Walker Domes Ltd. ("GWD") and Delta Urban Inc. ("Delta Urban") acts as Planning Consultant to Lark Investments Inc. ("Lark"); the registered owner of the properties municipally known as 10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road and 24 Bramalea Road, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located within the Bramalea GO Station 'Primary' Major Transit Station Area ("MTSA").

Lark has put forward a vision to transform the subject site 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. In this regard, Council passed a resolution in support of a Minister's Zoning Order (MZO) on October 20, 2021, and again on December 8, 2021. The MZO was submitted to the Ministry of Municipal Affairs and Housing (MMAH) to support the proposed intensification and higher-order development of the subject site within the Bramalea GO 'Primary' MTSA. The MZO is currently at the Province for review.

In addition, Lark has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, Lark's participation in the Bramalea GO MTSA Focus Group Session that was hosted by City Staff on April 13, 2023, and through formal written correspondence prepared by GWD on behalf of Lark to the City's Planning and Development Committee dated February 13, 2023, April 24, 2023 and July 18, 2023.

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Lark is also an Appellant of City of Brampton Official Plan Amendment OP2006-247.

City of Brampton Information Report

We understand that the City of Brampton Planning Department is tabling an Information Report to the August 28, 2023 Planning and Development Committee Meeting, including the holding of a Statutory Public Meeting in connection with the proposed MTSA policies and schedules as part of the future Official Plan Amendment recommending adoption of Brampton Plan. Public input on the proposed policies is being sought at the Statutory Public Meeting.

Lark continues to have significant concerns with the proposed Bramalea GO MTSA Land Use Plan as it is not consistent with the Council endorsed MZO Resolution.

Bramalea GO Station MTSA Draft Land Use Plan and Proposed Policies

GWD has reviewed the August 28, 2023 Information Report, including the proposed MTSA Policies and the revised Draft Bramalea GO Station MTSA Land Use Plan. Based on our review, we offer the following comments, observations and recommendations.

1. ***Proposed Land Use Designation*** – The subject site is proposed to be designated ‘Mid-Rise Residential’, ‘Mid-Rise Mixed-Use’, ‘High-Rise Mixed-Use’, ‘Office Mixed-Use’ and ‘Office’ pursuant to the Draft Bramalea GO Station MTSA Land Use Plan. Lark has serious concern with these proposed land use designations as they are not consistent with the Council endorsed MZO Resolution.

It is Lark’s position, based on the limited information provided at this time, that the subject site should be designated a combination of ‘High-Rise Mixed-Use’ and ‘Mid-Rise Mixed-Use’, consistent with the Council endorsed MZO Resolution.

City Staff in the response to comments Matrix in Appendix 5 of the August 28, 2023 Information Report suggest that there is “no reference in the Council Resolution about a Council “endorsed” Concept Plan, and that the “Council Resolution does not endorse any land use designations for lands subject to the MZO”. This is simply not true. Council Resolution notes, among other clauses:

- “Whereas City Council has received a request to support a Minister’s Zoning Order, referred to as an MZO, through a letter dated October 5, 2023 from Mustafa Ghassan of Delta Urban Inc., to facilitate the development of lands known municipally as 10 and 26 Victoria Crescent; 376, 387 and 391 Orenda Road, and 24 Bramalea Road, as well as the lands located within the area generally bounded, as noted below, and as identified on the attached Schedule A – Location and Land Use Map”; and,
- “Now Therefore be it Resolved That Council supports the request for an MZO and asks that the Minister of Municipal Affairs and Housing consider this request”.



The Schedule referred to in the Council Resolution, clearly notes the lands as a combination of 'Medium High Density' and 'Mixed-Use High Density'.

The following additional comments are provided on the designations located on the subject site pursuant to the Draft Bramalea GO Station MTSA Land Use Plan:

a. High-Rise Mixed Use/Mid-Rise Mixed Use Designations

As noted above we believe the subject site should be designated with the land use designation that permits high density/high-rise, and mid-rise built forms and a broad range of residential and non-residential land uses. However, in the absence of policies associated with the proposed land uses the identification of the appropriate land use designation and development policies associated thereto is not possible.

Prior to any consideration of potential land use designations with the Bramalea GO Station MTSA associated draft planning policies must be provided for review and comment.

b. Office Mixed-Use Designation

While the Office Mixed-Use Designation includes the ability to include mid-rise and high-rise residential, it does so with the condition that a specified number of jobs be provided given a ratio of MOE jobs to population for the various MTSA's. For the Bramalea GO, it is 2.2:1.

The area set aside for office / office mixed-use in the Bramalea GO MTSA is quite large, and is isolated from any other office areas/nodes. The proposed Draft Land Use Plan may have the unintended consequence of setting aside lands that the market will not support and will have the opposite effect – they will remain vacant. The materials do not seem to provide background on how the GFA numbers were arrived at, nor how the ratios were developed.

In addition, subsection c) of the proposed policies permits hotels, motels and conference/convention centres, along with offices as being uses that are primarily intended to for the Office Mixed-Use designation. These uses are neither office generators, nor will they generate the same number of jobs as an office.

c. Proposed Public or Private Street Network – The Draft Bramalea GO Station MTSA Land Use Plan identifies a 'Proposed Public or Private Street Network' on the subject site. The westerly extension of East Drive to Victoria Crescent is consistent with the Lark Vision/Council endorsed MZO Resolution, however the north-south connection from Victoria Crescent in the north to the Bramalea GO Station (crossing both Orenda Road and Steeles Avenue East) is not consistent with the Lark Vision/Council



endorsed MZO Resolution, and should be amended to reflect that alignment.

- d. Proposed Neighbourhood Park – Given the subject site's proximity to the Victoria Park complex and open space lands, as well as the nearby open space/trail system, along with the opportunity for amenity space within the proposed redevelopments, we continue to request that the 'Neighbourhood Park' be deleted.

2. **Proposed MTSA Policies** – It is unclear how the Interim Policies of OPA2006-247 are being integrated with these proposed policies. There are various criteria from the Interim policies on guiding development applications that are not part of these proposed policies. It would appear that the proposed MTSA policies for inclusion in the future Brampton Plan as outlined in Appendix 1 to the August 28, 2023 Information Report is incomplete. The full set of proposed policies should be brought forward, as opposed to a piecemeal fashion.

Closing Remarks

In consideration of the above noted concerns, Lark does not support the Draft Bramalea GO Station MTSA Land Use Plan or proposed policies for the Planning and Development Committee/City Council's consideration at this time.

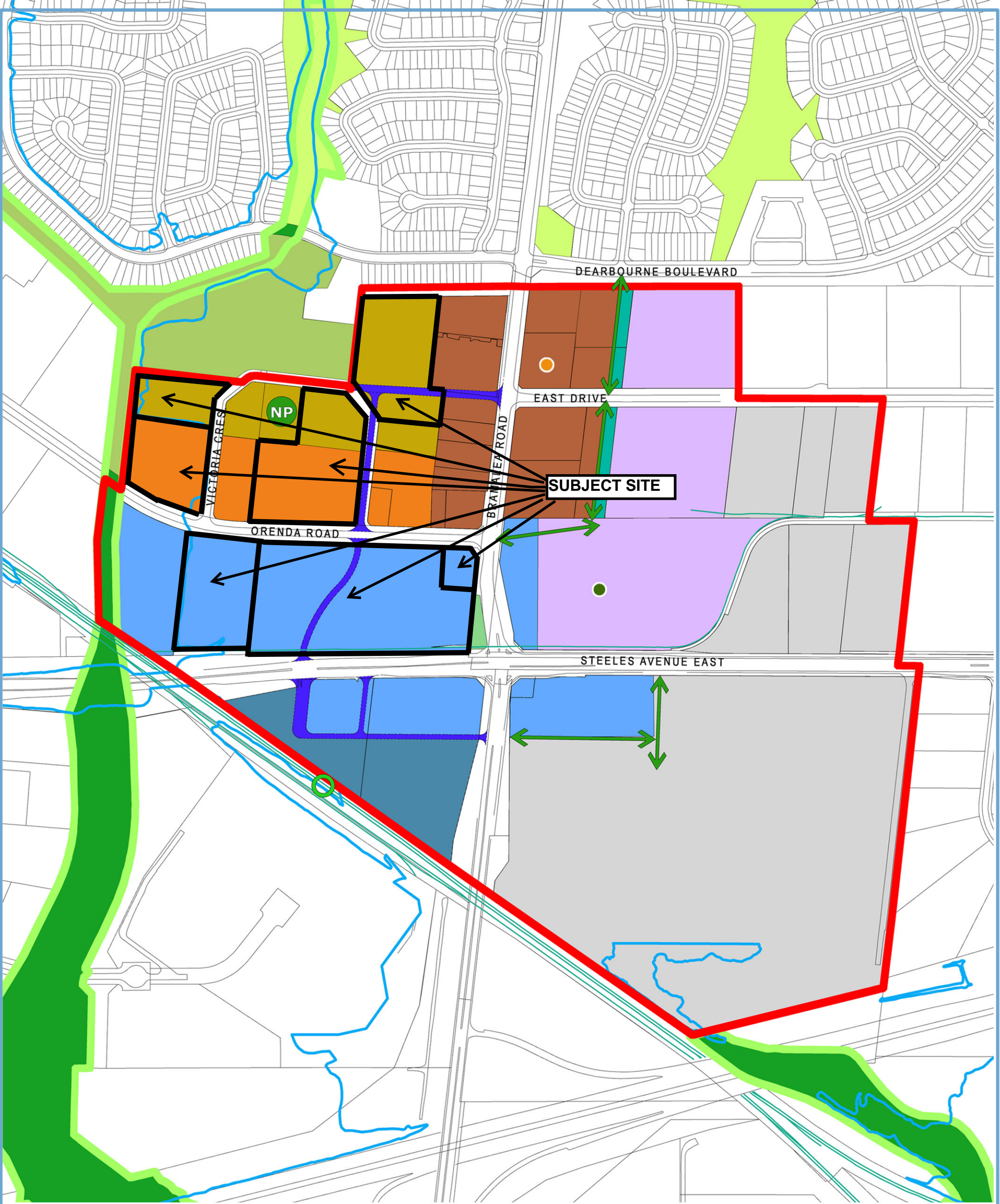
Lark would welcome opportunity to meet with City Staff to further discuss its concerns. We reserve the right to provide further comments.

Should you have any questions, please contact the undersigned.

Yours truly,

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

cc: Lark Investments Inc.
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LEGEND

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|--------------------------------------|---|---|
| NEIGHBOURHOOD (MID-RISE RESIDENTIAL) | NATURAL HERITAGE SYSTEM (NHS) | PROPOSED PUBLIC OR PRIVATE STREET NETWORK |
| MIXED-USE (MID-RISE MIXED-USE) | NHS BOUNDARY IN PARK | MID-BLOCK CONNECTION |
| MIXED-USE (HIGH-RISE MIXED-USE) | PARKS AND OPEN SPACE (COMMUNITY PARK) | PROPOSED LANDSCAPE BUFFER |
| OFFICE MIXED-USE | PARKS AND OPEN SPACE (NEIGHBOURHOOD PARK) | DESIGNATED HERITAGE PROPERTY |
| EMPLOYMENT (PRESTIGE INDUSTRIAL) | TRCA FLOODLINE | LISTED HERITAGE PROPERTY |
| EMPLOYMENT (INDUSTRIAL) | PROPOSED NEIGHBOURHOOD PARK | RAIL LINE |
| TRANSIT STATION | MTSA BOUNDARY | |
| | MTSA STATION | |

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

BRAMPTON MAJOR TRANSIT STATION AREAS
BRAMALEA GO STATION DRAFT LAND USE PLAN

DRAFT FOR REVIEW ONLY

AUGUST 2023