

SENT VIA EMAIL

P-3171

August 25, 2023

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

Attention: Regional Councillor Palleschi (Chair) and Members of Planning and Development Committee

**Re: Planning and Development Committee Meeting August 28, 2023
PD&D Agenda Item 5.1
Information Report re: Major Transit Station Areas (MTSAs), Draft Brampton Plan Policies, City-wide
Report Number: Planning, Bld & Growth Mgt-2023-708**

**Metrus Central Properties c/o DG Group and Metrus Properties Inc.
0 Steeles Ave. W. and 1735 Steeles Ave. W
City of Brampton
Region of Peel**

KLM Planning Partners Inc. acts on behalf of Metrus Central Properties c/o DG Group and Metrus Properties Inc. (the “**Clients**”) as it relates to their land holdings noted above. Our Client’s lands are located at the north east corner of Mississauga Road and Steeles Avenue West and the south west corner of Steeles Avenue West and Financial Drive, in the City of Brampton (the “**City**”), Region of Peel (the “**Region**”), both of which are located within the Steeles at Mississauga MTSA boundary (the “**Subject Lands**”). Aside from a sales offices located at the southeast corner of Mississauga Road and Olivia Marie Road, the Subject Lands are currently vacant.

We have reviewed the above noted staff report and associated appendices and would like to express the following concerns.

Proposed Land Use Framework

Our Clients have submitted applications for Official Plan Amendment and Zoning By-law Amendment for the Subject Lands, under file numbers OZS-2023-0014 and OZS-2023-0015 (the “**Applications**”) which are referenced in Attachment No. 3 of the staff report.

In connection with the above noted applications, an initial pre-consultation meeting was held with the City in 2021, where a concept plan including office, residential, and retail uses was provided. Since that time, our Client has developed a revised concept which considers comments received through the above noted pre-consultation process, further discussions with City staff and input from technical consultants, which formed the basis for the submission of the Applications.

The conceptual plan submitted in connection with the Applications contemplates a combined four thousand six hundred and ninety-seven (4,697) residential units, with one hundred and forty-eight (148) units being within five (5) blocks of stacked back-to-back townhouse dwellings in a four (4) storey built form, and four thousand five hundred and forty-six (4,546) apartment dwelling units within eighteen (18) buildings, ranging in height from six (6) storeys to sixteen (16) storeys. A large, central public amenity space of 23,917 square metres (2.39 hectares) is contemplated in addition to two (2) Privately Owned Public Spaces, as well as rooftop amenity spaces atop several of the apartment podiums and the office buildings described below. The residential dwelling units are planned to be developed with condominium tenure, however the number of condominium corporations to be registered is unknown at this time.

The conceptual plan also contemplates office use through two (2) five-storey office buildings, each with a Gross Floor Area (“**GFA**”) of 11,945 square metres. Additionally, ‘Flex Building A’ on the concept plan is proposed as a ‘Transitional Office’, with permissions to develop for either office or residential uses subject to certain criteria. Additionally, eight (8) of the residential apartment buildings will feature retail on the ground floor with a total GFA of 2,205 square metres.

We have had a series of productive meetings with staff to assist with the processing of the Applications, however we are concerned that the draft Land Use Schedule for the Steeles at Mississauga MTSA does not align with the proposed land use concept proposed as part of the Applications, which was designed with input from City staff and which we have discussed with the City for over two years. From a general perspective, the City’s proposal includes provision for mid-rise residential uses on the eastern half of the Subject Lands (and the entirety of the property on the south side of Steeles) with employment/mixed uses on the western half of the Subject Lands. Alternatively, the Applications aim to facilitate a high density mixed use development, consisting primarily of residential uses on the majority of the Subject Lands, with office employment permissions focused along the frontage of Mississauga Road and provision for an additional office building in the south west corner of the Subject Lands should market demand support same as identified above. In our opinion, the concept plan submitted in connection with the Applications is consistent with the Provincial Policy Statement (2020), conforms with

Provincial, Regional and Local policies as an attractive, compact, walkable, and transit-oriented community and will efficiently use a large parcel of land which has been vacant for over 15 years.

The City's proposed land use concept is fundamentally different from that proposed with the Applications, and on that basis, we do not support the proposed Draft Brampton Plan MTSA Policies and Land Use Schedules at this time.

Comments on the Proposed Official Plan Amendment

While we have substantial concerns with the fundamental land use concept proposed for the Subject Lands as outlined above, we have the following additional concerns on the proposed Draft Brampton Plan MTSA Policies and Land Use Schedules included as Appendix 1 of the staff report as follows:

1. As noted above, the City's proposed land use concept identifies that approximately half of the Subject Lands be designated 'Office Mixed-Use'. In support of the land use designation, the City's proposed land use framework identifies that a large portion of Brampton's major office employment ("MOE") will be located in the office-focused MTSA's, which includes Steeles at Mississauga, Ray Lawson, Bramalea GO and The Gore. The Steeles at Mississauga MTSA is specifically required to provide for a minimum of 6.3 jobs per 1 resident and a minimum office GFA to 2051 of 100,810 square metres. The staff report identifies that as a whole, the City would require 729,000 square metres (7,850,000 square feet) of new office GFA to accommodate office employment to 2051. This would represent a 92% increase in the City's office GFA base over the next 30 years.

Attachment 3 to the staff report shows the range and mix of office GFA proposed by way of private development applications in all the MTSA's as identified below:

•	Downtown:	23,017 square metres;
•	Centre:	3,158 square metres;
•	Kennedy:	15,854 square metres;
•	Rutherford:	8,688 square metres;
•	Laurelcrest:	0 square metres;
•	Dixie:	0 square metres;
•	Central Park:	0 square metres;
•	Bramalea:	0 square metres;
•	Gore:	16,208 square metres;
•	Gateway:	35,074 square metres;
•	Ray Lawson:	12,098 square metres;
•	Mt Pleasant:	3,496 square metres;
•	Bramalea GO:	12,550 square metres;
	Total:	130,143 square metres; (1,400,847 square feet)

Based on the above, all of the other Primary MTSA's have development applications for a total of 130,143 square metres of office space. The Steeles at Mississauga MTSA is being proposed to provide 100,810 square metres of office space which far exceeds what is proposed elsewhere in any other MTSA's, and nearly as much as all of the MTSA's combined, some of which are higher-order MTSA's (e.g., Bramalea GO, Downtown, Mt. Pleasant, etc.).

The City's office inventory (as per Costar data) grew from 5 million square feet to 6 million square feet over the last 10 years (Q2 2013 to Q2 2023). The Office Market Review of MTSA's prepared by Watson & Associates Economists Ltd. (the "**Watson Report**") estimates that the City 'anticipates' it will add 279,000 square feet of office space per year for 30 years. This 30-year pace would be more than double the highest 5-year growth rate seen since 2000 (see Figure E-5 of the Watson Report).

Office uses have been permitted on the Subject Lands for over 15 years, but have not materialized due to no demand for additional office space in this location. The 'Office Mixed-Use' designation is intended to facilitate primarily office uses, with mid-rise or high-rise residential uses permitted, but only provided the minimum jobs per population ratio can be maintained.

We understand that the four office-focused MTSA's (Steeles at Mississauga, Ray Lawson, Bramalea GO and The Gore) wherein MOE uses are directed are designated for employment uses in the Region's Official Plan. Notwithstanding, we question why the jobs/resident ratio for the Steeles at Mississauga MTSA is substantially higher than the others identified, particularly when there are lands in the other MOE MTSA's with opportunities for significant MOE development i.e., Shoppers World and Downtown Brampton. We would further note that job/population ratios may have the negative effect of freezing out needed housing supply while waiting for the office demand to materialize under a rigid policy approach, given the absence of office demand in this area.

An Economic Analysis for the Steeles at Mississauga MTSA (the "**Economic Analysis**") was prepared by Altus Group and submitted in connection with the Applications. The Economic Analysis concludes that any planning scenario depending on an office-oriented node to emerge in a timely manner is unrealistic. Given the quantity and nature of office development competition from locations elsewhere in the City (e.g. Downtown Brampton, Bramalea GO, Bramalea City Centre, etc.), and elsewhere in the GTA such as Downtown Toronto, Vaughan Metropolitan Centre, Markham Centre, and others, the Steeles at Mississauga MTSA and surrounding lands will face a significant challenge in attracting and developing new office spaces for the foreseeable future to practically achieve transit-supportive densities to match the anticipated timing of transit investments.

The Economic Analysis further concludes that there is a clear and demonstrable need to

to allow residential uses to achieve transit-supportive densities and efficiently use the land.

On this basis, we question the extent of the 'Office Mixed-Use' designation proposed for the Subject Lands as it conflicts with the land use plan submitted in connection with the Applications, and the proposed employment ratio given the lack of demand in this location.

2. The balance of the Subject Lands are proposed to be designated 'Mixed-Use (Mid-Rise Mixed-Use)' and 'Parks and Open Space (Neighbourhood Park)' with a Proposed Neighbourhood Park and Potential Community Hub identified. The policy framework for the proposed Mixed Use areas relies on the framework in the draft Brampton Plan. Under the draft Brampton Plan, the Mixed-Use designation permits Low-Rise Plus building typologies, with heights up to a maximum of 4 stories, with higher densities permitted subject to additional planning studies. Further, the Draft Brampton Plan MTSA Policies propose a Floor Space Index ("**FSI**") of 0.5 for lands designated Mid-Rise Mixed-Use.

Given direction from the Province, there should be no maximum height permission prescribed for lands within MTSA boundaries. Further, a FSI of 0.5 for the Subject Lands will not facilitate the development contemplated through the Applications. For context, the Applications aim to facilitate a FSI of 3.0 for the lands north of Steeles and 2.8 for the lands south of Steeles to achieve a high density mixed use community that will support the anticipated transit service investment.

A Functional Servicing Report was prepared by Schaeffers Consulting Engineers in connection with the Applications, which has not identified any servicing capacity issues based on the concept plan proposed.

On this basis, we do not support the proposed Mid-Rise Mixed-Use designation for the Subject Lands nor the associated FSI.

3. For the portion of the Subject Lands located on the south side of Steeles Avenue West, it does not appear that the City have proposed a land use designation for lands abutting properties located on the north side of Coastline Drive.
4. The proposed land use concept includes a 'Proposed Public or Private Street Network', with three connections to Olivia Marie Road, three to Financial Drive and opposing entrances to the north and south side of Steeles Avenue West. In addition, a series of 'Mid-Block Connections' are proposed. Based on comments received from the City on the Applications, we question whether all of the above noted connections are feasible.

A Traffic Brief was prepared by RJ Burnside & Associates Limited in connection with the Applications, which has identified that the access points as identified in the concept plan to the surrounding road network are appropriate from a traffic operations perspective.

The Traffic Brief further notes that there is excess capacity in the road network that can accommodate the projected site related traffic volumes, taking into account the planned significant increase in transit and active transportation infrastructure as well as the planned TDM measures for the proposed development.

5. Based on comments 1 – 4 above, we respectfully request that:
 - a. The Draft Brampton Plan MTSA Policies and Land Use Schedules be revised in accordance with the concept plan included as part of the Applications;
 - b. The jobs/resident ratios as identified above be removed, as these will artificially sterilize the MTSA lands as office market demand is transitioning; and,
 - c. The proposed Land Use Schedules be deleted and policies be introduced to identify that land use designations within the City's MTSA boundaries are to be determined at the time of detailed site specific development applications.
6. We further note that we have only recently received the Watson Report which was relied upon as the basis for the proposed policy framework, particularly as it relates to the 'Office Mixed-Use' designation. As of the date of this letter, we have not had time to review this report in detail and therefore reserve our right to provide additional comments once we have completed our review of same.

Our Clients are committed to delivering needed housing for both the City and the Region to support the Province's goal of constructing 1.5 million new homes by 2031. On March 8, 2023, the City endorsed a Municipal Housing Pledge to deliver 113,000 new homes by 2031 in support of the Province's housing goal. Associated with the City's pledge are a series of municipal initiatives that support the delivery of housing in the City.

The Province has released the Building Faster Fund which is accessible to municipalities that have pledged to achieve their housing targets. The three-year, \$1.2 billion fund will provide up to \$400 million per year to municipalities that have committed in writing to achieve their overall 2031 housing target. Each municipality's portion of the \$400 million annually will be determined based on their share of the greater Provincial housing supply goal, as well as their performance compared to their annual assigned targets. The proposed development as provided for with the Applications would assist the City in delivering needed housing in support of the Provincial goal, which would in turn help to secure needed funding from the Province to support planned growth through the Building Faster Fund.

We thank the City for the opportunity to provide comment on the Draft Brampton Plan MTSA Policies and Land Use Schedules and would respectfully request notice of any future meetings or decisions in this regard. Should you have any questions, do not hesitate to contact the undersigned.

Yours truly,

KLM PLANNING PARTNERS INC.



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