



**Zelinka Priamo Ltd.**

LAND USE PLANNERS

**VIA EMAIL**

October 20, 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: October 23, 2023 Special Meeting Agenda – Planning & Development Committee  
Item 7.1 – Staff Report: Proposed Adoption of the City of Brampton 2023 Official Plan (Brampton Plan)  
City of Brampton Official Plan Review  
Comments on Behalf of Canadian Tire Corporation Limited  
2021-2111 Steeles Avenue East, 10 and 12 Melanie Drive  
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 “Canadian Tire 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 on the Steeles Avenue East frontage.

On behalf of Canadian Tire, we have been monitoring the City’s Official Plan Review. For the first Draft Official Plan dated April 2022, we provided preliminary comments dated May 31, 2022 and met with Staff on June 15, 2022. For the Third Draft Official Plan dated September 2023, we provided the enclosed preliminary comments dated October 2, 2023 and met with Staff on October 17, 2023. In addition, for the City-initiated Major Transit Station Areas Draft Official Plan Amendment (OPA), we provided comments dated February 10, 2023, April 19, 2023, July 26, 2023 and August 22, 2023. For the City-initiated Major Transit Station Study Area Study specific to the Bramalea GO MTSA, we met with Staff on April 14, 2023 and provided comments dated April 19, 2023 for the Preliminary Area Plan for the Bramalea GO MTSA.

It is our understanding that at the October 23, 2023 Planning and Development Committee Meeting, a Staff Report dated October 23, 2023 will be considered, which recommends that City Council authorize the passing of the By-law to adopt the new 2023 Official Plan – Brampton Plan (the “Final Draft Official Plan”) and that the City Clerk be authorized and

directed to make application to the Region of Peel for approval of the new City of Brampton 2023 Official Plan in accordance with *Planning Act* requirements. Based upon our review, the Staff Report included responses to our October 2, 2023 comments under Attachment 2 in the Comment Matrix. While some of our comments were addressed in the Final Draft Official Plan, we continue to have outstanding concerns raised through our previous comments that have not been addressed, including the interrelationship of the policy overlays and future studies in the context of the employment areas designations and the redevelopment of the Canadian Tire Lands, as well as with the Site and Area specific policies for Major Transit Station Areas in Chapter 4.

We look forward to continuing to work with City of Brampton and Region of Peel Staff to address our remaining concerns prior to final approval of the Brampton Official Plan.

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 and future updates regarding the ongoing MTSA implementation project.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Jonathan Rodger, MScPI, MCIP, RPP  
Principal Planner

cc. Canadian Tire Corporation, Limited (via email)  
Davis Webb LLP (via email)

## **APPENDIX A**

**Comments dated October 2, 2023 for the Third Draft Official Plan**



**Zelinka Priamo Ltd.**

LAND USE PLANNERS

**VIA EMAIL**

October 2, 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  
Preliminary Comments on Behalf of Canadian Tire Corporation, Limited  
2021-2111 Steeles Avenue East, 10 and 12 Melanie Drive  
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 “Canadian Tire Lands”). The 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. It is our understanding that a Third Draft Official Plan dated September 2023 and associated Draft schedules was released for review. The City released a first Draft Official Plan dated April 2022, for which we provided preliminary comments dated May 31, 2022 and met with Staff on June 15, 2022. Based upon our review of the Third Draft Official Plan, on behalf of Canadian Tire we have preliminary comments as outlined below and will continue to review the Third Draft Official Plan in more detail and may provide further comments as required.

**As a general comment, the redevelopment of the Canadian Tire Lands for employment uses (including the proposed warehousing uses under the first phase of redevelopment) through the Minister Zoning Order (MZO) that was endorsed by Council, should be reflected in the applicable Draft Official Plan Policies and Framework. In the Response to our comments for the First Draft Official Plan, Staff note “Comment Addressed - MZO currently has no standing and will not be reflected in current iteration of Brampton Plan. Revised Mixed-Use Employment policy section identifies the permissions for MTSAs that are located in PSEZ, subject to further planning studies.” We reiterate our comment.**

## **BACKGROUND**

### **Redevelopment Plans**

Canadian Tire are planning the redevelopment of the Canadian Tire 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 Canadian Tire Lands (the “First Phase Redevelopment”). A second phase for future development is planned for an approximately 3.2 ha (8.0 ac) portion of the Canadian Tire Lands in proximity to the Bramalea and Steeles intersection, which is intended for office, retail and commercial uses (the “Second Phase Redevelopment”).

### **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. At this time, it is our understanding that the Minister’s Zoning Order Resolution Request is under review.

### **CITY OF BRAMPTON OFFICIAL PLAN REVIEW**

Based on our review of the Third Draft Official Plan schedules, we note the following and have comments as noted:

- On Schedule 1, City Structure that illustrates how the City should evolve over the next several decades to 2051, the Canadian Tire Lands are shown as Employment Areas, in proximity to a Town Centre (centred on the Bramalea GO Transit Station), with the Steeles Avenue East frontage shown as Secondary Urban Boulevards and the Bramalea Road frontage shown as Support Corridor. The Lands, with the exception of 10 and 12 Melanie Drive are shown within a Primary Major Transit Station Area;
- On Schedule 2, Designations, the Canadian Tire Lands are split designated Mixed-Use Employment (at the southwest quadrant of Steeles and Bramalea) and Employment, with a portion of the Canadian Tire Lands within the Lester B. Pearson International Airport (LBPIA) Operating Area;
- On Schedule 3B, Transit Network to 2051, Steeles Avenue East is shown as Higher Order Transit (BRT or LRT) and Bramalea Road is shown as Support Corridor;
- On Schedule 3C, Streets Network, Steeles Avenue East is shown as Major Arterial (Regional) and Bramalea Road is shown as Minor Arterial;
- On Schedule 4, City Road Right-of-Way Widths, Bramalea Road is shown with a right-of-way width of 36 m;
- On Schedule 5, Provincial Plans & Policy Areas, the Canadian Tire Lands are shown as Provincially Significant Employment Zones (PSEZ);

- On Schedule 7, Parks and Open Space, Steeles Avenue East and Bramalea Road are shown as Greenway Boulevards;
- On Schedule 8, Proposed Energy Planning Districts, a portion of the Canadian Tire Lands is shown as within an Energy Planning District and District Energy Areas (subject to further refinement through the completion of future feasibility studies). **We request clarification as to the intent and purpose of identifying Energy Planning District as there appears to be no associated policies in the Draft Official Plan;**
- On Schedule 10, Secondary Plan Areas, the Canadian Tire Lands are shown as 9 Brampton Mobility Hub Secondary Plan, with the exception of the lands known municipally as 10 and 12 Melanie Drive that are shown as 4 Airport Intermodal Secondary Plan; and
- On Schedule 12, Site and Area Specific Policies, the Canadian Tire Lands are generally within the Lester B. Pearson International Airport (LBPIA) Operation Area.

At this time, our preliminary comments for the Third Draft Official Plan are as follows:

- Policy 2.1.2.27 states “Centres will be designated as Mixed-Use on Schedule 2 through subsequent planning studies to provide appropriate use, form, and intensity requirements.” **We request clarification in the context of the Canadian Tire Lands where there is a Town Centre overlaid with lands designated Employment Areas, that there is *no* intention to redesignate the lands as Mixed-Use on Schedule 2 through subsequent planning study;**
- **For the Major Transit Station Areas and Boulevards and the Figure shown on page 2-15, we request clarification as to the intention for showing the Bramalea GO MTSA as “Planned MTSA, Out of Scope (MZO)” which is inconsistent with the draft MTSA policies and land use schedules in Section 4;**
- Policy 2.2.1.2.a) states “The Urban Centre and Town Centre are conceptual overlays which indicate the City’s principal locations for growth, accommodate important regional amenities, and provide for the greatest mix of uses, intensity, form, and scale in Brampton. The exact boundaries for these areas will be determined through their respective Secondary Plan processes”, and Policy 2.2.1.2.d) states “Within the Planned Major Transit Station Area overlay, development will be limited until a Precinct Plan is in place to guide development and to protect the area for transit-supportive densities, uses and active transportation connections. **We request clarification as to whether the City’s MTSA Project for MTSAs including Bramalea GO represents the Secondary Plan process referenced in the policy or if further studies are contemplated. In addition, in the context of Policy 2.1.2.45 that states “Where a Secondary Plan does not yet identify the location of Precincts, Precinct boundaries will be determined in collaboration with the City and Region. The City may require the submission of Precinct Plans, as part of any Draft Plans and/or Official Plan Amendment and Zoning By-law Amendment application within Centres, Boulevards, Major Transit Station Areas, and Corridors in accordance with the policies of Part 2.2 and Chapter 5”, we request clarification that a Precinct Plan will not be required in all circumstances,**

- and accordingly the policy language should be revised to include “where appropriate” before “development will be limited until a Precinct Plan”;
- Table 5 Summary of Building Typologies by Designation and Overlay indicates that for various designations “additional planning studies” may be required to “identify appropriate locations for Low-Rise Plus, Mid-Rise, and High-Rise buildings”. **We request clarification as to whether the City’s MTSA Project for MTSA’s including Bramalea GO represents the “additional planning studies” referenced in the policy or if further studies are contemplated. In addition, we request clarification for the “Support Corridor” designation and what is intended for the “Up to Low-Rise Plus”, since there is no lower category than “Low-Rise” and there are no “additional permissions” indicated;**
  - Policy 2.2.3 for the Centres states “Bramalea GO will build upon the Bramalea GO Station, and its location along the Kitchener-Toronto Innovation Corridor to attract residents and offices, to support the thriving employment area.” **In our submission, “residents and offices” should be revised to “residents and employment uses, including offices”;**
  - Policy 2.2.3.1 states “Each Urban Centre and Town Centre will be subject to a Secondary Plan or Major Transit Station Area study, which will establish a vision for each Centre.” **Similar to our comments above, we request clarification as to whether the City’s ongoing MTSA Project for MTSA’s including Bramalea GO represents the “additional planning studies” referenced in the policy or if further studies are contemplated. In addition, we request clarification as to there are circumstances where there will be both a Secondary Plan and Major Transit Station Area study;**
  - Policy 2.2.3.3.b states “Prioritize Sustainable Mobility. Centres will encourage comfortable and enjoyable active transportation facilities, especially with direct connections to Rapid Transit stations, while discouraging uses, site design and building forms that create reliance on private automobiles.” **For Centres that are overlaid upon Employment Areas, we request clarification that employment uses such as warehousing will not be discouraged;**
  - Policy 2.2.3.5 (formerly 2.2.7) states “The following uses may be permitted within Urban Centres and Town Centres as shown on Schedule 1: a. A broad range of uses in keeping with the Mixed-Use designation, including but not limited to residential, commercial, office, cultural, major and local institutional, hospitality, entertainment, recreational and other related uses may be permitted. Other uses may be permitted, as determined through the respective Secondary Plan ... d. New parking facilities within Centres will be integrated within buildings and structures. Parking may also be facilitated on street. Where the land use of an existing mall site is transitioning, surface parking may be permitted on a case-by-case basis.” **In the Response to our comments for the First Draft Official Plan, Staff note “Comment Addressed - existing permissions will continue. However, if they are within an overlay, redevelopment will require conformity with Brampton Plan. If lands are within an MTSA in an employment area, the Mixed use Employment designation will prevail and continue to permit employment uses. The Mixed Use Employment have been updated as part of the second draft release, please review and provide comments if further clarity is required.” For the Canadian Tire Lands that are shown on Schedule 1 as Employment Areas and shown on Schedule 2 as split designated Mixed-Use**

- Employment (at the southwest quadrant of Steeles and Bramalea) and Employment, we request clarification as to the Town Centre designation is only applicable to the lands designated Mixed-Use Employment and suggest that clarity be added to the Official Plan;**
- Policy 2.2.3.11 states Growth and development within Urban and Town Centres will primarily occur through redevelopment and intensification, comprised of compact, high-quality buildings. Growth and development will contribute to vibrancy, and high quality urban living within Centres by: ...” and Policy 2.2.3.13 States “For development proposed on large lots, a grid-pattern of public streets and publicly accessible mid-block pedestrian connections or in special circumstances private streets, will create smaller human-scaled blocks to facilitate development and/or redevelopment over time.” **In the context of the policies, for the Canadian Tire Lands that are shown on Schedule 1 as Employment Areas and shown on Schedule 2 as split designated Mixed-Use Employment (at the southwest quadrant of Steeles and Bramalea) and Employment, we request clarification as to whether the Town Centre designation is only applicable to the lands designated Mixed-Use Employment. In addition, in our submission for Policy 2.2.3.13 “will create” should be changed to “should create” to provide for flexibility to account for context and operational aspects;**
  - Policy 2.2.3.16 states “Each Urban Centre and Town Centre will be subject to a Secondary Plan, in accordance with the Region of Peel Official Plan, that will: ...” **Similar to our comments above, we request clarification as to whether the City’s ongoing MTSA Project for MTSA’s including Bramalea GO represents the “additional planning studies” referenced in the policy or if further studies are contemplated;**
  - Policy 2.2.4 for Boulevards states “The framework for new development on each Boulevard will be established by Secondary-Level Plans and City-Wide Urban Design Guidelines created in consultation with the local community.” **Similar to our comments above, we request clarification as to whether the City’s ongoing MTSA Project for MTSA’s including Bramalea GO represents the “additional planning studies” referenced in the policy or the scope of additional studies that are contemplated;**
  - Policy 2.2.4.3 states “The following policies apply to Primary and Secondary Urban Boulevards shown on Schedule 1: a. A broad range of residential, retail, office, cultural, institutional, hospitality, entertainment, recreational and other related uses may be permitted. Residential uses may only be permitted on lands designated Mixed-Use Employment in accordance with the policies for the Mixed-Use Employment designation within certain Major Transit Station Areas, subject to the outcomes of the respective Major Transit Station Area study. ... g. The design of new development will consolidate and where achievable, relocate parking and service areas underground or to where they are not visible from streets and pedestrian areas. New accessory surface parking lots along Primary Urban Boulevards will be discouraged and will not be permitted to front along a Primary Urban Boulevard. h. Single use buildings are permitted on portions of the Secondary Urban Boulevard that are not within delineated Centres.” **We request clarification as to the applicability of Secondary Urban Boulevard overlay where there is an underlying designation is Employment Areas and the permitted uses would include single-use warehouse uses and associated**



- parking, such as those proposed for the Canadian Tire Lands under the Phase 1 application for Site Plan approval;**
- Policy 2.2.4.4 states “Primary and Secondary Urban Boulevards will redevelop as higher density mixed-use areas, focusing on residential and employment intensification for the existing Community and Employment Areas respectively, that they overlay.” **With the Draft Official Plan intended to be implemented over the long term, we suggest that “over the long term” be added before “will”;**
  - Policy 2.2.4.9 states “Development along either side of Primary and Secondary Urban Boulevards will achieve a high level of design excellence in conformity with the Urban Design policies of this Plan, including relevant Secondary-Level Plans, and in accordance with the City-Wide Urban Design Guidelines and area specific Urban Design Guidelines, to: ... i) Offer a variety of formal and informal gathering spaces through the provision of recreation open spaces, city parks, urban plazas, and community-led services ... p) On large lots, establish a grid-pattern of public streets and publicly accessible mid-block pedestrian connections, or in special circumstances private streets, to create smaller human-scaled blocks to facilitate development and/or redevelopment over time..” **In our submission, for i) “where appropriate” should be added before “offer a variety”, since the formal and informal gathering spaces may not be appropriate under all circumstances, including for Employment Areas and for p) “where appropriate” should be added before “On large lots” since a grid-pattern of public streets and publicly accessible mid-block pedestrian connections may not be appropriate under all circumstances, including for Employment Areas;**
  - Policy 2.2.4.10 states “The Zoning By-law, together with Site Plan Control, and other regulatory tools as appropriate, will include requirements for maximum lot coverage, minimum landscaped area, minimum lot size, building setbacks, height, front and side yard setbacks, massing, floor area, roofline, materials, as appropriate, having regard for: ...” **In our submission, “materials” should be deleted;**
  - Policy 2.2.4.15 states “Lands within Primary Major Transit Station Areas will be developed in accordance with the applicable Secondary-Level Plan designation to generally meet the following objectives: ...” **We request confirmation as to whether the policies are intended to be updated to reflect the MTSA Project, for which we provided comments dated August 22, 2023 on behalf of Canadian Tire (see Appendix A);**
  - Policy 2.2.4.19 states “Where new development includes parking as an accessory use, such parking will be located mainly underground or, if within the principal building, not fronting a public street.” **In our submission “will” should be changed to “should” in order to provide for flexibility to account for site context and operational aspects, including for employment uses;**
  - Policy 3.1.1.6 states “All new development will facilitate environmental sustainability and climate change mitigation and adaption by incorporating innovative, adapted and resilient design features into the design of the built environment, including: ...” **In our submission “through measures such as” should replace “including” in order to clarify that the measures are not required in all circumstances;**

- Policy 3.1.1.59 states “Recognizing the role that commercial, institutional and employment lands can provide in contributing to a sense of place, the design of non-residential development will conform with all of the applicable and relevant policies of this Plan, with particular focus on all of the Urban Design and Land Use Compatibility policies of this Plan, and will: a. Minimize surface parking in Employment Areas;”. **In our submission, “Where appropriate” should be added before “minimize” in order to provide for flexibility to account for context and operational aspects, including for warehouse uses where underground parking is not feasible;**
- Policy 3.4.2.48 states “Minimum parking requirements will be eliminated, and maximum parking limits and shared parking requirements may be established by the Zoning By-law, in Centres, Boulevards, and Major Transit Station Areas and other areas determined by the City.” **In our submission, the establishment of any maximum parking limits should include consideration as to operational requirements for uses, including commercial uses as well as employment uses such as warehouses;**
- The Major Transit Station Areas policies state on page 4-12 “Note to Final Draft: The draft policies contained within this Section are subject to change and further refinement prior to Council adoption as part of the City’s ongoing Major Transit Station Area Study. Schedule 13A-N is to be included as part of the Final Brampton Plan”. **We request that the draft policies be released for review and comment prior to their concurrent adoption with the Draft Official Plan planned for November 4, 2023. We note that on behalf of Canadian Tire, we provided the enclosed comments dated August 22, 2023 for the City-initiated MTSA Project (see Appendix A); and**
- **As a general comment, in our submission, all defined terms under the Glossary should be italicized for ease of review.**

**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.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Jonathan Rodger, MScPI, MCIP, RPP  
Senior Associate

cc. Canadian Tire Corporation, Limited (via email)  
Davis Webb LLP (via email)

**APPENDIX A**

**Comments dated August 22, 2023 for the City-Initiated MTSA Project**



**VIA EMAIL**

August 22, 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: Planning & Development Committee Meeting  
August 28, 2023 Agenda, Item 5.1  
Information Report - Major Transit Station Areas (MTSAs), Draft Brampton  
Plan Policies, City-wide (Report No.: Planning, Bld & Growth Mgt-2023-708)  
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 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. For the Major Transit Station Areas Draft Official Plan Amendment (OPA), we provided comments dated February 10, 2023 and April 19, 2023. For the City-initiated Major Transit Station Study Area Study specific to the Bramalea GO MTSA, we met with Staff on April 14, 2023 and provided comments dated April 19, 2023 for the Preliminary Area Plan for the Bramalea GO MTSA. Lastly, on July 26, 2023 we provided comments for the Preliminary Land Use Plans, City-wide.

It is our understanding that at the August 28, 2023 Planning and Development Committee Meeting, a Staff Report dated July 31, 2023 will be considered, which recommends that Staff be directed to include the proposed MTSA policies and schedules as part of the future OPA recommending adoption of Brampton Plan. Based upon our review of the Staff Report, the Draft “Chapter 4 Site and Area Specific Policies” (the “Draft Area Specific Policies”), Bramalea GO MTSA Preliminary Land Use Plan, and the Staff responses to our comments dated July 26, 2023, on behalf of Canadian Tire we have preliminary comments as outlined below and we will continue to review the Staff

Report, Draft Area Specific Policies and Bramalea GO MTSA Preliminary Land Use Plan in more detail and may provide further comments as required.

## **BACKGROUND**

### **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 (the “First Phase Redevelopment”). 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 (the “Second Phase Redevelopment”).

### **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 MTSA BRAMPTON PLAN POLICIES**

At this time, our preliminary comments for the Bramalea GO MTSA Preliminary Land Use Plan are as follows:

- The Canadian Tire Lands within the MTSA form part of the lands subject to the MZO Request. Under our comments dated July 26, 2023 we noted that the Recommendation Staff Report dated May 19, 2023 stated that “A significant portion of the Bramalea GO MTSA is presently being reviewed under a Minister’s Zoning Order (MZO). The MZO request was initiated by some landowners within the MTSA boundaries to permit residential uses. This MZO request was endorsed by a Council in December 2021. A MZO decision would supersede any potential conflicts in the proposed land use designations as the City no longer has jurisdiction to make a decision”. The Staff Response to our comments dated July 26, 2023 states “Agree” with “No action required”;
- “Mid-Block Connections” are shown within the Canadian Tire Lands, including from Bramalea Road and from Steeles Avenue East in general proximity to the “Office Mixed-Use” portion of the Canadian Tire Lands. Under our comments dated July 26, 2023, we submitted that the mid-block connections within the Canadian Tire Lands should be removed as it will not be appropriate to have publicly-accessible connections through or adjacent to the warehouse uses under the First Phase Redevelopment. The Staff Response to our comments states “The intent of the “Mid-Block Connections’ is to enhance vehicular, pedestrian connections and mobility within and through the area. It may be determined through the development approval process that the mid-block connection is only appropriate for pedestrian connections, in this instance, for the employees in the surrounding employment uses” with “No action required”.

Based upon the Staff Response, we have the comments noted below for the draft Mid-Block Connections policies;

- While Canadian Tire supports having no proposed public or private street network, a signalized intersection on Steeles Avenue East between the “Office Mixed-Use” land use and the “Industrial” land use is proposed under the Site Plan Approval application, in order to provide sufficient access to support the proposed First Phase Redevelopment and Second Phase Redevelopment. Accordingly, under our comments dated July 26, 2023, we submitted that the Bramalea GO MTSA Preliminary Land Use Plan should carry through the “All Moves Intersection” on Steeles Avenue East currently shown on the Transportation Elements Schedule 9(B) of the Bramalea Mobility Hub Secondary Plan Area 9, with a shift westwards to align with the proposed signalized intersection between the “Office Mixed-Use” and “Industrial” land uses. The Staff Response to our comments states “Due to the recent construction of the warehouse building on the north – east corner of Bramalea Road and Steeles Avenue Road there is no longer any land available to construct a collector road on the north side of Steeles Avenue between Bramalea Road and the rail spur line. Therefore, the “All Moves Intersection” on this section of Steeles Avenue East is no longer being contemplated and will be removed from Schedule 9(B).” with “No action required”. We continue to submit that a signalized intersection on Steeles Avenue East between the “Office Mixed-Use” land use and the “Industrial” land use as proposed under the Site Plan Approval application be reflected under Bramalea Mobility Hub Secondary Plan Area 9. The signalized intersection would line up with the existing driveway into the new warehouse building to the north and would provide access for the Phase 1 and 2 Redevelopment of the Canadian Tire Lands as well as for the industrial uses to the north. Accordingly, the signalized intersection should be subject to further review and discussion with Staff; and
- Under our comments dated July 26, 2023, we noted that a small portion of the Canadian Tire Lands is shown as “Natural Heritage System” with a note that that “this boundary is currently being updated for this MTSA”. The Staff Response to our comments states “The Bramalea GO MTSA land use schedule reflects the current Natural Heritage System boundaries. NHS boundaries will be refined through subsequent development applications if necessary” with “No action required”. Accordingly, it is our understanding that the NHS boundary, as may be necessary, will be confirmed under the existing application for Site Plan Approval (City File no. SPA-2022-0185).

At this time, our preliminary comments for the Draft Area Specific Policies are as follows:

- For the “Office Mixed-Use” designation that is shown for the Second Phase Redevelopment of the Canadian Tire Lands:
  - We request that the Office Market Review of Major Transit Station Areas prepared by Watson & Associates Economists Ltd. be released for public review;
  - Draft Policy a) states “The ratio of MOE jobs to be provided in Table 1 shall not include population serving jobs (employment that primarily serves a resident population), such as retail, education, health care, local

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government and work-at home employment” and Table 1 indicates a Minimum Office Gross Floor Area (2021 to 2051) for Bramalea GO of 83,470 sq. m. The introduction to Table 1 states “In order to achieve the City’s target for MOE within 4 of its “Primary” MTSAs, a minimum ratio of MOE jobs shall be provided in accordance with Table 1 on all properties designated ‘Office Mixed-Use’”. We request clarification that the Minimum Office GFA is intended to be calculated to include all of the properties designated Office Mixed-Use in the Bramalea GO MTSA with no minimum attributed to any particular lands. In addition, we suggest that clarity be provided as to the calculation of MOE ratio as to what is included; and

- Draft Policy c) states “Lands designated ‘Office Mixed-Use’ are intended primarily for office uses, including hotels, motels, conference/ convention centres and may also contain mid-rise or high-rise residential uses subject to providing the MOE ratio (per site) listed in Table 1. Permitted office uses are not required to be contained within a mixed-use building. Accessory street-related retail, commercial and institutional uses are permitted as long as they are integrated with the office or residential building.” For the MOE ratio (per site) listed in Table 1, we request confirmation that the MOE ratio (per site) will not be applicable where no residential uses are proposed. As to the permissions for “Accessory street-related retail, commercial and institutional uses”, in our submission clarification should be provided that individual uses do not need to be accessory to office uses (including hotels, motels, conference/ convention centres) with the removal of the “Accessory” before “street-related”. Lastly, we note that under the draft MZO, the draft “Mixed-Use Commercial” zone that relates to the Second Phase Redevelopment of the Canadian Tire Lands would permit a range of non-residential service and commercial uses including restaurants and health and fitness centres. We request clarification that the intent of the “commercial” uses permissions would include a broad range of uses including restaurants, service uses and health and fitness centres;
- For the “Employment (Industrial)” designation that is shown for the First Phase Redevelopment of the Canadian Tire Lands, we note that there are no Draft Area Specific Policies proposed and accordingly, we request that the draft policies be released for public review. In our comments dated July 26, 2023 we stated that the anticipated associated Secondary Plan Policies should ensure that the “Industrial” land use would permit the First Phase Redevelopment of the Canadian Tire Lands for warehousing uses in order to reflect the MZO Request. The Staff Response to our comments states “The proposed MTSA Official Plan land use policies include some transition policies to provide some flexibility for infill development prior to comprehensive redevelopment. Refer to Appendix 1” with “No action required”. We reserve the opportunity to comment further once the draft policies for the “Employment (Industrial)” designation are provided;
- For the Transportation Network policies, Draft Policy f) states “Vehicular access to parking, service facilities and loading areas shall be achieved from local roads. Temporary or interim vehicular access from an existing road may be permitted as a condition of the development application process, or through an agreement

- with the City, until such time that a new local road and access are constructed.” In our submission, “generally” should be added after “shall” in order to provide flexibility to ensure that existing and new accesses to non-local roads, including Steeles Avenue East and Bramalea Road adjacent to the Canadian Tire Lands, would continue to be permitted;
- For the Mid-Block Connections that would be established through the development application process, Draft Policy c) states “Enhance vehicular and/or pedestrian connections and mobility within and through the area” and Draft Policy d) states “Provide safe and accessible corridors for vehicles, pedestrians and cyclists”. In the context of our comments above related to a signalized entrance to the Canadian Tire Lands on Steeles Avenue East, we request clarification that a signalized entrance would meet the intent of Draft Policies c) and d) through the provision of vehicular and pedestrian connections into the Canadian Tire Lands; and
  - For the Minimum Density policies, Draft Policy a) states “Individual development proposals (per site) shall meet the minimum FSI target” where under Table 2 the Employment (Industrial) minimum FSI target is 0.25 and the Office Mixed-use minimum FSI target is 2.5 and Draft Policy b) states “The minimum floor space index in Table 2 does not apply to: i. lands required for public parks, natural heritage system and open spaces; ii. institutional uses; iii. transit station facilities; and iv. community and recreation uses operated by a public authority”:
    - Under the Phase 1 Redevelopment for the Canadian Tire Lands, Building 2 straddles the boundary of the MTSA. We request clarification as to how the minimum density would be calculated to ensure conformance with the Draft Policy. We note that the Phase 1 Redevelopment provides for approx. 119,150.33 sq. m over the entire 33.5 ha, including the parcels at 10 and 12 Melanie Drive, resulting in an FSI of approximately 0.35 percent, which would exceed the minimum of 0.25;
    - For the Phase 2 Redevelopment for the Canadian Tire Lands of approximately 3.2 ha (8.0 ac), at a minimum density of 2.5 FSI, approximately 80,052 sq. m (861,668 sq. ft.) of Office Mixed Use development would be required, which would nearly exceed the entire 83,470 sq. m Minimum Office Gross Floor Area (2021 to 2051) for the Bramalea GO MTSA. In addition, we note that due to the airport height limitations, the development of the Office Mixed Use uses will be limited on the Phase 2 Redevelopment Canadian Tire Lands. Accordingly, in our submission the minimum FSI that would be applicable to the Phase 2 Redevelopment for the Canadian Tire Lands should be subject to further review; and
    - In our submission, lands utilized for Stormwater Management ponds, such as that proposed for the Canadian Tire Lands under the Phase 1 Redevelopment, should be excluded as well under Draft Policy b).

Lastly, for the Brampton MTSA Bramalea GO Station Development Activities mapping and the Canadian Tire Lands, we note that the small parcel immediately adjacent to the Steeles Avenue East and Bramalea Road intersection known as 2021 Steeles Avenue East forms part of the existing application for Site Plan Approval (City File no. SPA-



2022-0185). In addition, as noted above, the application for SPA includes the Canadian Tire Lands known municipally as 10 and 12 Melanie Drive. Accordingly, the mapping should be updated.

We would welcome the opportunity to meet with Staff to discuss our comments.

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 associated Official Plan Amendment (Secondary Plan) and passing of the Zoning By-law Amendment, as may be applicable.

Yours very truly,

**ZELINKA PRIAMO LTD.**



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