

Posted Online (to Environmental Registry Ontario)

28 February 2019

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
c/o Business Management Division, 17th floor
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**Re: Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017*
(ERO # 013-4504)
Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans)
(ERO # 013-4505)
Proposed Framework for Provincially Significant Employment Zones
(ERO # 013-4506)**

Submissions by 69 Bramalea Holdings Ltd.

We represent 69 Bramalea Holdings Ltd. ("Medallion"), the owner of the property municipally known as 69 Bramalea Road in the City of Brampton (the "Medallion Site"). On behalf of Medallion, we have reviewed the Province's proposals noted above as they apply to the Medallion Site and submit the following comments for the Minister's consideration.

Medallion would welcome an opportunity to discuss these comments with the Minister's office, and would be pleased to provide additional information related to the Medallion Site if it would assist in considering the requests made in this submission.

Summary

The Medallion Site should be removed from the proposed *Provincially Significant Employment Zone #14 - Pearson Airport Hub (Airport)*. Notwithstanding that the Medallion Site is designated *Employment Area* in the Brampton Official Plan, in June 2017, following a municipal comprehensive review ("MCR"), the City adopted an official plan amendment to convert the site from employment to a mix of residential and retail uses ("OPA 133"). OPA 133 is not in force due to third party appeals to the Local Planning Appeal Tribunal ("LPAT").

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Even absent OPA 133, it would not be appropriate to include the Medallion Site within the *Provincially Significant Employment Zone* (“PSEZ”) boundary because it is located within a major transit station area (“MTSA”) surrounding the Bramalea GO Station, which is designated in the Brampton Official Plan as a *Mobility Hub*. Mobility Hubs are intended to accommodate a concentration of higher density mixed-uses that support higher order public transit. This planned function is clearly at odds with including the area within the PSEZ boundary, to the extent that the PSEZ designation could hinder the delivery of transit supportive development.

In the event that the PSEZ boundary is not amended to exclude the Medallion Site (which we submit would not be appropriate as it would be contrary to the City’s approval of OPA 133 and the Mobility Hub planned function), it would be appropriate to exempt OPA 133 from Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* in light of the LPAT appeals.

The Medallion Site

The Medallion Site is a relatively small (0.8 ha) property located on the east side of Bramalea Road north of Steeles Avenue in the City of Brampton (see attached maps). The site is improved with two buildings which are tenanted with retail and service commercial uses.

Within the Brampton Official Plan, the Medallion Site is located within an *Employment Area* and has a general land use designation of *Office*. Notwithstanding that the Medallion Site is designated *Employment Area*, the site is located within an area that is intended to accommodate a concentration of higher density mixed uses. In particular, the Medallion Site is located less than 800 metres from the Bramalea GO Station, which is planned as a Major Transit Station Area / Mobility Hub as follows:

- in the Peel Region Official Plan, the area surrounding the Bramalea GO Station is designated as a *Mobility Hub Gateway* and the plan requires local area municipalities to identify major intensification opportunities (such as Major Transit Station Areas); and
- in its Official Plan, Brampton has identified the area surrounding the Bramalea GO Station as a *Gateway Mobility Hub*, in which the Medallion Site is included.

As the Ministry will know, Mobility Hubs are significant Major Transit Station Areas (“MTSA”) that are planned to have a concentration of higher density mixed uses, to best support public transit infrastructure. There are a total of nine (9) MTSAs in Brampton, of which only four (4) are Mobility Hubs, including the Bramalea GO Mobility Hub. In addition to being within a Mobility Hub, the Medallion Site fronts onto a *Primary Intensification Corridor* (Bramalea Road) in the Brampton Official Plan. As such, the Medallion Site is in a prime location for a higher density mix of uses.

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The Medallion Site is also subject to the Bramalea South Gateway Redevelopment Area Secondary Plan, which envisions the secondary plan area as a mixed-use centre that functions as an urban gateway into the City - distinct from the larger employment area that abuts the secondary plan area to the west, south and east.

On 21 June 2017, City Council approved OPA 133 to convert the Medallion Site from employment uses to residential and retail uses. This was done as part of the City's MCR process, which culminated in the conversion of several other employment sites as well. OPA 133 changes the designation of the Medallion Site from *Office* to *Residential / Special Land Use Policy Area 20*. OPA 133 includes policies which, amongst other matters, require that:

- the implementing official plan amendment and zoning by-law include a minimum gross floor area of retail uses be provided in the building, to ensure that employment targets are achieved for the site;
- the building be sited and oriented to provide an appropriate interface with adjacent industrial areas, and that the proposal provide the necessary mitigation measures both on and off site to ensure that existing adjacent industrial uses are able to continue and/or expand their existing operations; and
- the applicant demonstrate that the proposal meets noise and air quality standards for the residential portion of the development.

OPA 133 is subject to third party appeals to the LPAT, and therefore is not yet in force and effect.

In May 2018, City Council endorsed a planning document called the Brampton 2040 Vision, which is intended to guide development in Brampton to the year 2040. The Brampton 2040 Vision document identifies the area surrounding the Bramalea GO Station as a "Town Centre". Each Town Centre is directed to have a mix of commercial and residential uses, and the Bramalea GO Town Centre is envisioned to have a population growth of 5,000 residents and 5,000 jobs over the planning horizon of 2040. OPA 133 is consistent with this visioning exercise.

Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* and Proposed Framework for Provincially Significant Employment Zones

As noted above, the Medallion Site is located within the proposed *Provincially Significant Employment Zone #14 - Pearson Airport Hub (Airport)*.

Medallion supports the Minister's intention to create "a modernized employment area designation system that ensures lands used for employment are appropriately protected while unlocking land for

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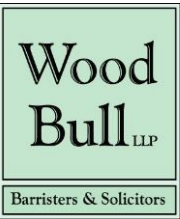
residential development". In that regard, where a PSEZ site is also located within an MTSA, as with the Medallion Site, it is important to carefully consider whether the future redevelopment of the site should be restricted by including it within the PSEZ boundary. We appreciate the Ministry's specific request for feedback on sites that are the subject of such overlap.

In this case, it is clear that the Medallion Site should be removed from the proposed PSEZ boundary given:

- a) Brampton Council's recent approval of OPA 133 to convert the Medallion Site for a mix of residential and retail uses;
- b) the Medallion Site is located within a significant MTSA (a Mobility Hub) within the Brampton Official Plan, which are generally intended to have a concentration of higher density mixed uses; and
- c) the City's emerging vision document that identifies the area surrounding the Bramalea GO Station as a "Town Centre".

In respect of the criteria the Province used to identify PSEZ and the Proposed Growth Plan Amendment, we also note the following:

- the Medallion Site is not supportive of industrial uses - the site is designated *Office* (subject to OPA 133 coming into effect), there are no official plan permissions for industrial uses on the site, and zoning permissions for industrial uses are frozen (through an ICBL) until the City's area planning study is completed;
- the Medallion Site is not part of a large contiguous developable area - the site is relatively small, and is surrounded by lands designated *Office* to the east and south, a very narrow strip of *Industrial* to the north (beyond which is *Residential*) and *Residential* to the west on the other side of Bramalea Road;
- OPA 133 specifically requires that jobs are preserved on the site (proposed policy 2.2.5(14)) and addresses any potential concerns of land use compatibility (proposed policy 2.2.5(8)); and
- given its proximity to Highway 407, the Medallion Site would appear to have good highway access, but in reality there is no access to Highway 407 westbound from the Bramalea Road interchange, nor is there access to Bramalea Road from Highway 407 for vehicles coming from the west. The indirect highway access to/from the Medallion Site could prove problematic for suppliers to a prospective industrial user, or customers/employees of tenants of an office building.



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Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans)

It is Medallion's position that the Province should administer Growth Plan transition such that municipal approvals made within one policy regime are not frustrated by a policy regime that comes into effect after that approval was made. In this case, in the event that the PSEZ boundary is not amended to exclude the Medallion Site (which we submit would not be appropriate as it would be contrary to the City's approval of OPA 133 and the Mobility Hub planned function), it would be appropriate to address the conversion of the Medallion Site through the proposed transition regulation, and exempt OPA 133 from Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* to allow the LPAT process to complete.

We thank you in advance for your consideration of these matters, and reiterate our client's interest in meeting with the Minister's office to discuss these matters further.

Yours very truly,

Wood Bull LLP

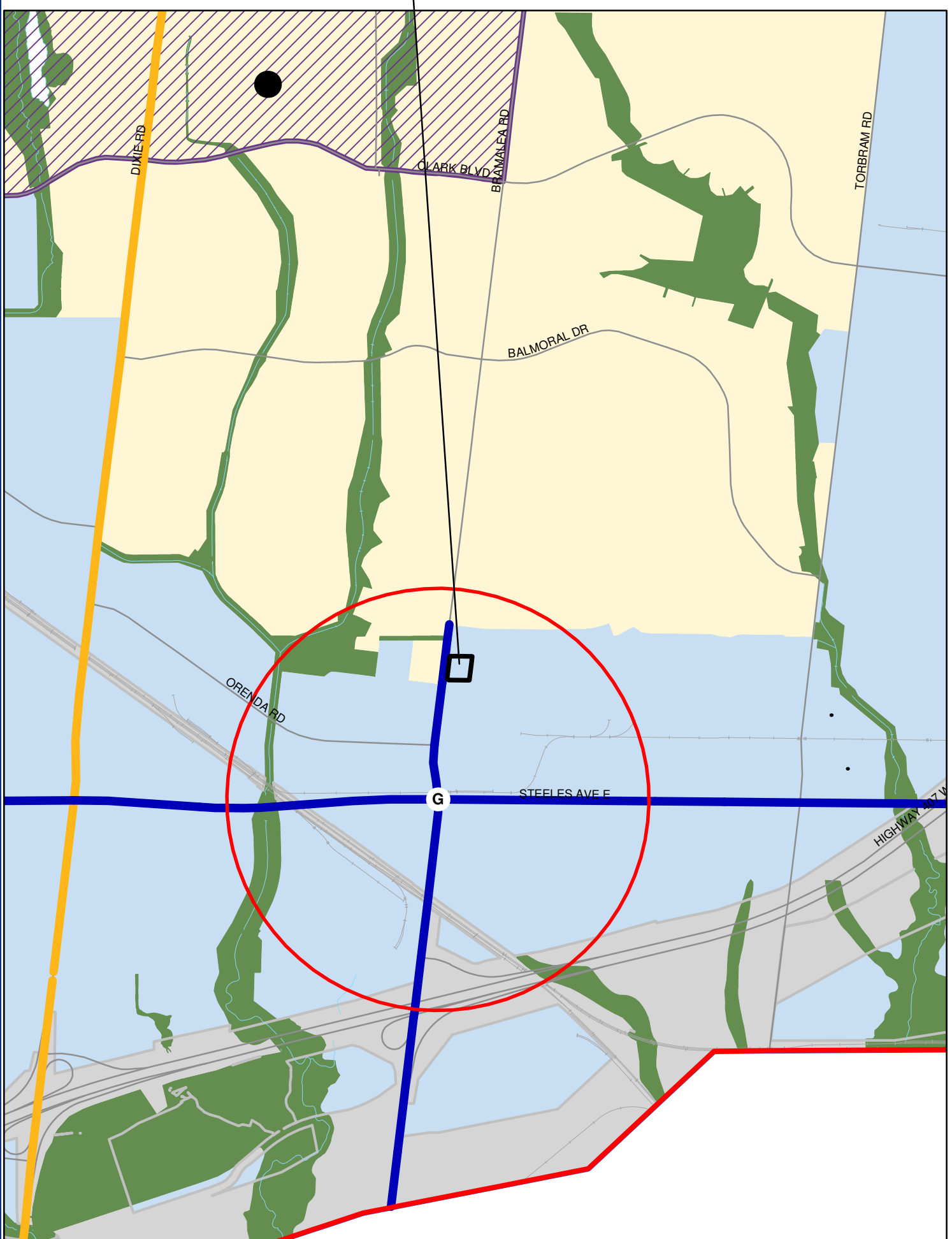
A handwritten signature in blue ink, appearing to read "Jshapira", is written over the typed name.

















Johanna R. Shapira

JRS

c. Client

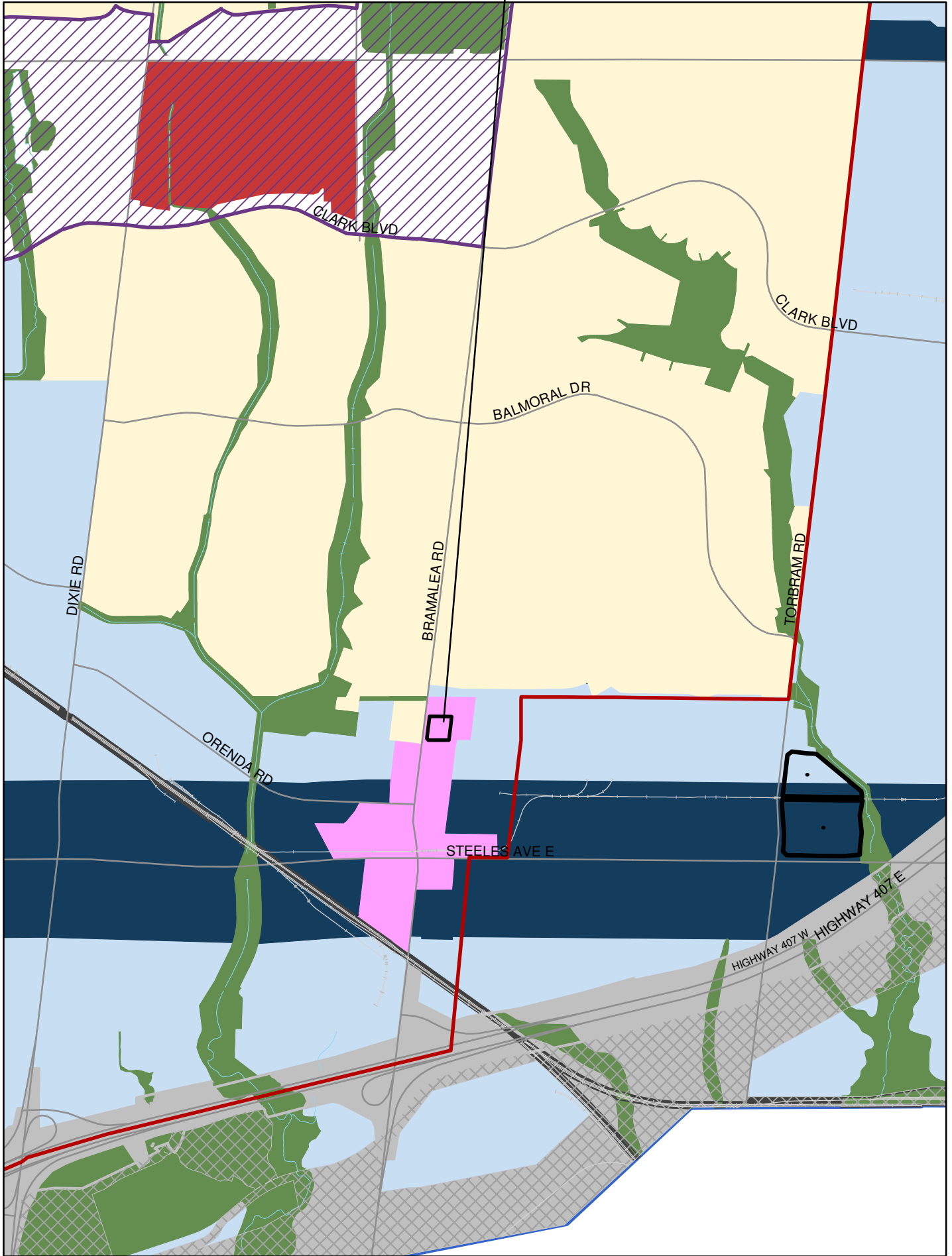
LANDS TO BE REDESIGNATED FROM "EMPLOYMENT AREAS"
TO "COMMUNITIES"























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|---|------------------|---|--|---|------------------------------------|---|---|
|  | CENTRAL AREA |  | NORTH WEST BRAMPTON URBAN DEVELOPMENT AREA |  | BUILT BOUNDARY |  | DESIGNATED GREENFIELD AREA |
|  | EMPLOYMENT AREAS |  | UNIQUE COMMUNITIES |  | INTENSIFICATION CORRIDOR |  | MAJOR TRANSIT STATION AREA |
|  | DEFERRAL |  | OPEN SPACE SYSTEM |  | SECONDARY INTENSIFICATION CORRIDOR |  | SUBJECT PROPERTY |
|  | COMMUNITIES |  | PROVINCIAL GREENBELT / PROTECTED COUNTRYSIDE |  | PRIMARY INTENSIFICATION CORRIDOR |  | MOBILITY HUB
A - ANCHOR
G - GATEWAY |



LANDS TO BE REDESIGNATED FROM "OFFICE"
TO "RESIDENTIAL" & "SPECIAL LAND USE POLICY AREA: 69 BRAMALEA RD"



	RESIDENTIAL		BUSINESS CORRIDOR		CENTRAL AREA		CORRIDOR PROTECTION AREA
	ESTATE RESIDENTIAL		INDUSTRIAL		N-W BRAMPTON URBAN DEVELOPMENT AREA		PARKWAY BELT WEST
	VILLAGE RESIDENTIAL		MAJOR INSTITUTIONAL		SPECIAL LAND USE POLICY AREA <i>See Section 4.14.3</i>		PROVINCIAL HIGHWAYS
	REGIONAL RETAIL		OPEN SPACE		SPECIAL STUDY AREA <i>See Section 4.14.1</i>		L.B.P.I.A. OPERATING AREA
	OFFICE		PROVINCIAL GREENBELT AREA/PROTECTED COUNTRYSIDE		SUBJECT PROPERTY		DEFERRAL

