

February 28<sup>th</sup>, 2019

Mr. Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
17<sup>th</sup> floor, 777 Bay Street  
Toronto, Ontario M5G 2E5

Dear Mr O'Hara:

**RE: PROPOSED AMENDMENT 1 TO GROWTH PLAN  
COMMENT SUBMISSION ON BEHLAF OF SSLI1 DEVELOPMENT LP  
166 LYNDEN ROAD, BRANTFORD  
OUR FILE: 1814C**

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On behalf of our client, SSLI1 Development LP, we have reviewed the mapping for the proposed Provincially Significant Employment Zones. Our client owns lands on the south side on Lynden Road at Dalkeith Drive in the City of Brantford, municipally addressed as 166 Lynden Road (hereinafter the "subject lands") (**Figure 1**). It is our understanding that the subject lands have been included in proposed Provincially Significant Employment Zone 29 (Brantford).

The subject lands are currently designated as General Commercial (GC) within the City of Brantford Official Plan (**Figure 2**). This designation permits the use of retail, restaurant, entertainment, hotel, motel, recreational and office uses. Further, Council passed Modified Policy Area 99 on March 26, 2008, which permits the use of a retirement home on the subject lands (**Figure 3**). See the attached excerpts from the Official Plan.

Although the subject lands are currently vacant, we are actively guiding our client through planning approvals to permit the use of a retirement home and long-term care facility on the subject lands.

**On the basis of the above, we request that the subject lands be removed from the limit of Provincially Significant Employment Zone 29 (Brantford) as it is within a General Commercial designation and within Modified Policy Area 99, permitting the use of a retirement home among other uses. Therefore, the subject lands does not meet the definition of an Employment Area as set out in the 2014 Provincial Policy Statement or the 2017 Growth Plan for the Greater Golden Horseshoe.**

We further request that should the mapping be modified that additional consultation is undertaking to ensure the mapping is accurate.

We appreciate your attention to this matter and hope that our request to correct this mapping is undertaken.

Thank you.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'D. McKay', written over a large, stylized circular scribble.

David A. McKay, MSc, MLAI, MCIP, RPP  
Vice President & Partner


cc. Tom Heaton



Data Source: First Base Solutions Aerial Flown 2018

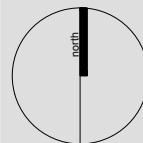
Figure 1  
Location Map

**LEGEND**

 Subject Lands

DATE: January 11, 2019

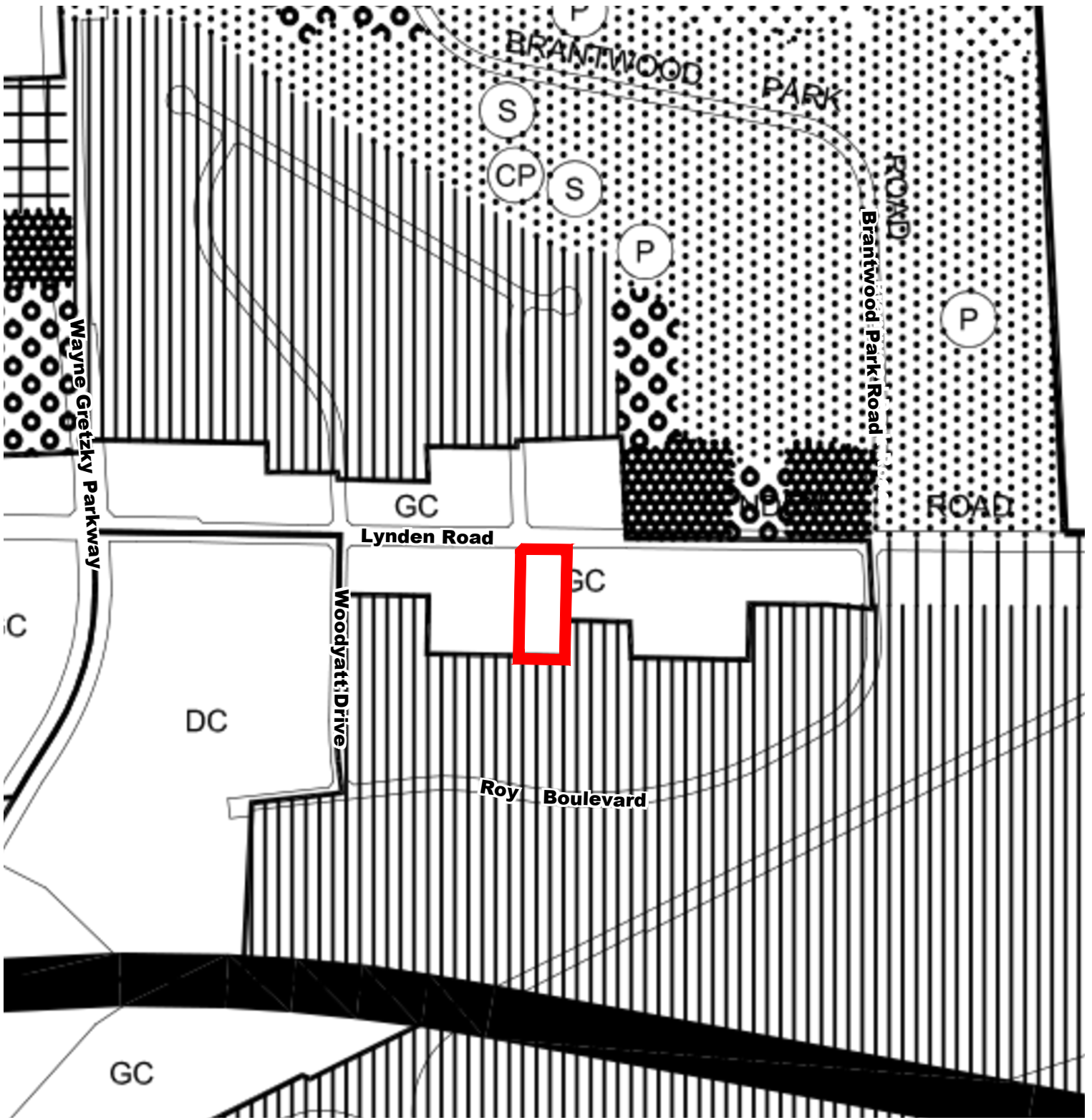
SCALE 1:7500



**166 Lynden Road,  
Brantford, Ontario**

N:\1814\C - Lynden Rd, Brantford\2019\PIRFigures\CAD\1814C Figure Mapping 11 January 2018.dwg

**MHBC** PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE  
230-7050 WESTON ROAD WOODBRIDGE, ON, L4L 8G7  
P: 905 761 5588 F: 905 761 5589 | WWW.MHBCPLAN.COM



Data Source: City of Brantford Official Plan- Schedule 1-1 Land Use Plan (2014)

Figure 2

**City of Brantford  
Official Plan**

Schedule 1-1  
Land Use Plan

166 Lynden Road,  
Brantford, Ontario

**LEGEND**

Subject Lands

General Commercial

District Centre Commercial

General

Mixed Industrial Commercial

Low Density

Medium Density

High Density

Major Institutional

Neighbourhood Park and Open Space

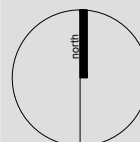
Community Park and Open Space

Elementary School

Provincial Highway

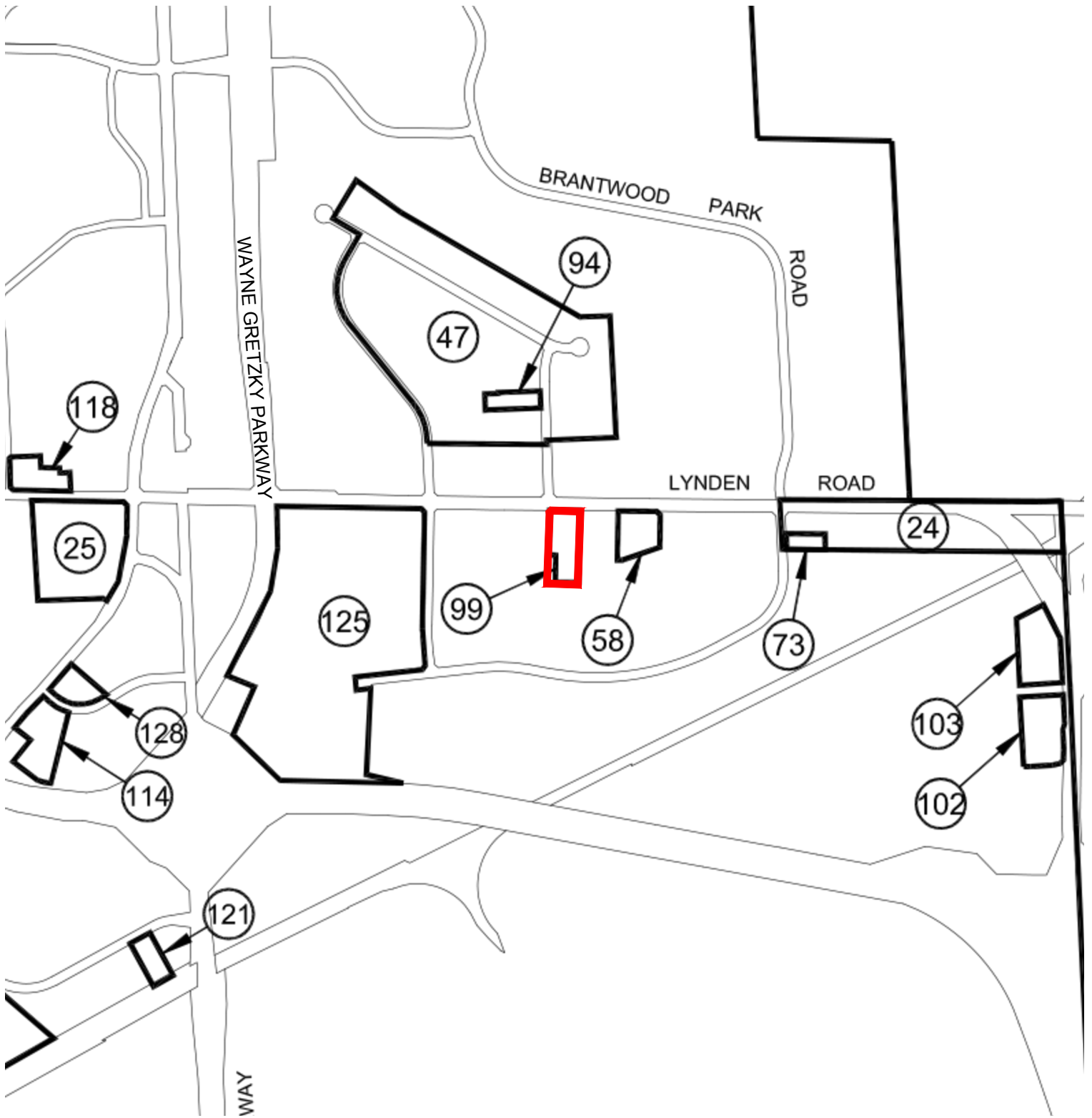
DATE: January 11, 2019

SCALE 1:10000



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Data Source: City of Brantford Official Plan- Schedule 2: Modified Policy Areas (2018)

Figure 3

**City of Brantford  
Official Plan**

Schedule 2:  
Modified Policy Areas

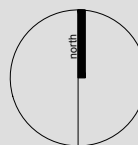
**166 Lynden Road,  
Brantford, Ontario**

**LEGEND**

- Subject Lands
- Modified Policy Area
- 99 Number

DATE: February 14, 2019

SCALE 1:15000



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**7.3.6 General Commercial Areas**

- 7.3.6.1 The General Commercial Area designations as shown on **Schedule 1-1 - Land Use Plan** shall include retail and service commercial uses that, by the nature of their function, benefit from accessibility to and visibility from Major Collector, Minor Arterial or Major Arterial Roads and thereby provide a service to pedestrian and automobile-borne trade. These uses will include a broad range of retail uses; restaurants and entertainment uses; hotel and motel uses; personal and business services; recreational uses; business and professional offices and accessory uses. In addition, multiple unit residential dwellings shall be permitted. All uses may be permitted in either mixed use or single use buildings in accordance with the City's Urban Design Guidelines.
- OPA #49  
June 1/95
- OPA #59  
Nov. 19/97
- OPA #84  
July 14/00
- OPA #125  
Dec. 3/08
- OPA #184  
Dec. 20/13
- 7.3.6.2 Deleted
- OPA #49  
June 1/95  
OPA #84  
July 14/00
- 7.3.6.3 Uses which shall be prohibited in a General Commercial Area designation include:
- .1 major and junior department stores;
- .2 supermarkets, other than those existing at the date of adoption of this Official Plan.
- 7.3.6.4 Outside storage or display of merchandise shall be permitted only in locations where their exposure would be visually acceptable, or could be screened from view, and would not impact on the character of the area.
- 7.3.6.5 Comprehensive block development of General Commercial Area lands in separate ownerships will be encouraged in order to achieve well-designed and integrated development. To enhance the streetscape quality and pedestrian environment along major retail streets, and to achieve well-designed and integrated developments in General Commercial areas, the City will develop urban design and site planning guidelines, to be implemented during site plan review, for new development which will address the following issues:
- OPA #49  
June 1/95
- OPA #84  
July 14/00
- .1 integrated internal circulation systems;
- .2 co-ordinated access points, in order to minimize the total number of access points to abutting roads;
- .3 compatible building design and location, in order to achieve a consistent streetscape;
- .4 appropriate landscaping to enhance the pedestrian environment and streetscape quality both within the site and along the street frontage of the property;
- OPA #84  
July 14/00

- .5 integrated parking areas; and
- .6 consistent signage and lighting facilities.

However, development within an existing building or on a lot of record may be permitted subject to site plan approval and/or appropriate amendments to the zoning bylaw.

7.3.6.6 The applicant will indicate how development on an individual property may be co-ordinated and integrated with other properties within the surrounding General Commercial Area designation, in accordance with the provisions of Section 7.3.6.5.

7.3.6.7 Comprehensive block development will be encouraged through the provisions of the implementing Zoning Bylaw and site plan approval.

7.3.6.8 Development in General Commercial Area designations shall occur as infilling within the areas designated on **Schedule 1-1 - Land Use Plan** and extensions of these areas shall only be permitted by amendment to the Official Plan.

OPA #125  
Dec. 3/08

**7.3.7 Deleted**

OPA #49  
June 1/95

**7.3.8 Mixed Commercial-Residential Area**

7.3.8.1 The Mixed Commercial-Residential Area designation as shown on **Schedule 1-1 - Land Use Plan** shall include a restricted range of retail and service commercial uses and residential uses, located in a specific portion of the City.

OPA #125  
Dec. 3/08

7.3.8.2 The main permitted uses shall include:

OPA #49  
June 1/95

- .1 single-detached, semi-detached, duplex, triplex, and fourplex residential dwellings;
- .2 business and professional offices;
- .3 townhouse, rowhouse, fourplex, low-rise apartments, and other forms of low rise multiple unit dwelling units, including lodging houses, located within a building originally constructed as a single detached residential dwelling;
- .4 limited specialty retail stores;
- .5 personal service stores, such as hair stylists, dry cleaning depots, and tailors;
- .6 restaurants, excluding drive-in and take-out restaurants;

OPA #125  
Dec. 3/08

**7.8.97 Area 97 - 68 – 70 Fairview Drive**

OPA #136  
OMB Order  
1003  
Apr. 13/07

Notwithstanding the "Residential Area – Low Density" designation on the lands in Area 97 – 68 – 70 Fairview Drive, as indicated on **Schedule 2 – Modified Policy Areas**, development shall be permitted only in accordance with the following policy:

- .1 The maximum number of single detached cluster dwelling units permitted shall be restricted to 11 units.

**7.8.98 Area 98 – 115 – 119 Market Street**

OPA #137  
Jan. 10/08

Notwithstanding the "General Commercial" designation on the lands in Area 98 – 115 – 119 Market Street, as indicated on **Schedule 2 – Modified Policy Areas**, development shall be permitted in accordance with the General Commercial policies together with the following:

- .1 Ground floor residential dwelling units are permitted provided that there are one or more permitted non-residential uses also located on the ground floor.

**7.8.99 Area 99 – 166 Lynden Road**

OPA #138  
Mar. 26/08

Notwithstanding the "General Commercial" designation on the lands in Area 99 – 166 Lynden Road, as indicated on **Schedule 2 – Modified Policy Areas**, the uses permitted shall also include a retirement home having a maximum gross floor area of 17,500m<sup>2</sup>, maximum building height of 24 metres and a minimum off-street parking of 1 space/3 beds, as well as General Commercial uses.

**7.8.100 Area 100 – WITHDRAWN****7.8.101 Area 101 – Northeast Corner of Blackburn Drive & Diana Avenue**

OPA #145  
Apr. 30/08

(Deleted by Amendment).

OPA #199  
June 27/17