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February 3, 2022

REGION OF PEEL

OFFICE OF THE REGIONAL CLERK

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED ☒ _____

Clerk's Office
Region of Peel
10 Peel Centre Drive, Suite A and B
Brampton, ON L6T 4B9

February 2, 2022
File 10596

Attn: Members of the Planning and Growth Management Committee

**RE: Agenda Item 5.1: Official Plan Review and Municipal Comprehensive Review
Employment Conversion Request Submission (B35)
110 East Drive, City of Brampton**

Weston Consulting is the Planner for the owner of the lands located at 110 East Drive in the City of Brampton (herein referred to as the "subject property"). On November 30, 2021, we submitted an Employment Conversion Request letter for the subject property to be considered as part of the Region's ongoing Municipal Comprehensive Review (MCR) process (Attachment 1). The purpose of the conversion request is to permit non-employment uses on the subject property, including residential uses, to support future mixed-use development. According to the Employment Conversion Analysis Report dated January 2022 (the "Analysis Report") prepared by Staff, the subject property is not being recommended for conversion and removal from the Regional employment area.

We have reviewed Staff's analysis of the Employment Conversion Request. In our opinion, the Employment Conversion Request for the subject property meets the tests of the Growth Plan and is appropriate given the site's location within a Major Transit Station Area (MTSA) and adjacent to an existing residential neighbourhood to the north. The purpose of this letter is to request that the Planning and Growth Management Committee review Staff's decision and consider providing support for the requested employment conversion.

The subject property is located within the Bramalea GO MTSA, which has a minimum density target of 150 residents and jobs combined per hectare according to Policy 2.2.4.3(c) of the Growth Plan. The Growth Plan policy regarding MTSA density targets is reinforced in the Brampton Official Plan which identifies the subject property within a Gateway Mobility Hub and establishes a density target of 100 to 150 people and jobs combined per hectare. The requested employment conversion of the subject property will support the achievement of the Provincial, Regional and local density targets.

Introducing residential land use permissions on the subject property to facilitate a future mixed-use development will provide for an appropriate transition from the low-rise residential neighbourhood to the north and the surrounding employment uses. Staff's analysis raises land use compatibility issues as a concern for introducing residential uses on the subject property. It is important to recognize that the subject property is located at the edge of the employment area.

Furthermore, an existing residential neighbourhood abuts the property to the north and high-rise residential towers are located to the west of the site on Bramalea Road. These existing residential uses have not been impacted by the employment uses in the surrounding area, demonstrating how both uses are compatible and are able to co-exist. It is our opinion that the subject property is located in a transition area between the adjacent residential uses and employment uses, positioning it as an appropriate location for a mixed-use development providing for both employment and non-employment uses including residential uses.

According to the Analysis Report, the subject property is located within an MTSA flexible policy area *“which may permit a range of mixed uses, to be considered post-MCR through local municipal comprehensive planning and implementation of the larger MTSA.”* The MTSA is intended to support the development of a complete community which includes allowing for a mix of uses and transit-supportive densities. In our opinion, a mixed-use development on the subject property including both employment and residential uses supports the intent of transforming the Bramalea GO MTSA into a complete community and will not impact the viability of the surrounding lands. The subject property’s location at the edge of the employment area and adjacent to residential uses positions the site in an optimal location to introduce residential uses into the MTSA, which will be required to provide for mixed and sensitive uses to meet the Growth Plan density target. It is our opinion that the requested employment conversion for the subject property is appropriate and should be supported.

Finally, it should be noted that the City of Brampton’s Council has provided support for a Minister Zoning Order (MZO) for the Emerald Heights Community, a 15 hectare area located within the boundaries of the Bramalea GO MTSA. The proposed Emerald Heights Community area includes the subject property. On October 20, 2021, Brampton Council passed a resolution supporting the MZO request. This demonstrates local support for residential land use permissions on the subject property. It is our understanding that the implementing MZO By-law has been forwarded to the Minister of Municipal Affairs and Housing for approval.

Thank you for the opportunity to provide comments on the Employment Conversion Request Analysis Report. We reserve the right to provide additional comments throughout this process. Should you have any questions, please contact the undersigned.

Yours truly,

Weston Consulting

Per:

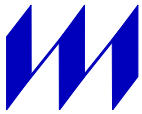


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Ryan Guetter Weston Consulting
Tara Buonpensiero, Region of Peel
Joy Simms, Region of Peel
Duran Wedderburn, Region of Peel

Attachment 1: Employment Conversion Request Letter dated November 30, 2021.



WESTON CONSULTING

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Regional Planning and Growth Management
10 Peel Centre Drive, Suite A and B
Brampton, ON L6T 4B9

November 30, 2021
File 10596

Attn: Tara Buonpensiero, Manager, Policy Development

Dear Madame,

**RE: Regional Municipal Comprehensive Review (MCR)
Employment Conversion Request Submission
110 East Drive, City of Brampton**

Weston Consulting is the Planner for the owner of lands located at 110 East Drive in the City of Brampton (herein referred to as the “subject property”). This letter is being submitted as part of the Municipal Comprehensive Review (MCR) process to request an employment land conversion to permit non-employment uses on the subject property in order to support future mixed use development on the site, which would include residential uses.

This letter addresses the Peel Region Employment Area Conversion policies outlined in the Peel 2051+ Preliminary Employment Conversion Analysis, dated May 2021, the Draft Region of Peel 2051 Land Needs Assessment Report, draft Regional Official Plan Amendment (ROPA) policies, and the criteria established in A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) for evaluating employment land conversions. This letter also addresses the Emerald Heights Community proposal, submitted by Lark Investments Inc. as part of a Minister’s Zoning Order (MZO) request, for the lands within the Bramalea GO Major Transit Station Area (MTSA), which includes the subject property. The Emerald Heights proposal was endorsed by City of Brampton Planning and Development Committee for a Minister’s Zoning Order (MZO) at the meeting dated October 18, 2021, and endorsed by Council at the City Council meeting dated October 20, 2021.

Weston Consulting has also conducted meetings with Staff at the Region of Peel and Staff at the City of Brampton to discuss the proposed employment conversion request. The outcome of these meetings is summarized in this letter.

Description of the Subject Property and Policy Context

The subject property is located east of the Bramalea Road and East Drive intersection, south of Dearbourne Boulevard and is approximately 3.04 hectares (7.51 acres) in size with approximately 191.45 metres of frontage along East Drive. The site is currently occupied by

a low-rise office and warehouse building and is surrounded by commercial and warehousing/distribution uses to the east, west and south. Two residential high-rise buildings are located approximately 300 metres from the subject property on the west side of Bramalea Road. There is a low-rise residential neighbourhood comprised of single detached dwellings located directly north of the subject property.



Figure 1 – Aerial Photo

The subject property is located at the edge of a Provincially Significant Employment Zone (PSEZ) according to the province's online mapping tool (Figure 2). The in-force Region of Peel Official Plan (ROP) does not provide mapping for employment designations, however the Region has released draft Official Plan Amendment Policies and Mapping that identifies draft *Employment Areas* across the region. Draft Schedule Y6 (Employment Areas) of the proposed Regional Official Plan Amendment identifies the subject property at the edge of a proposed *Employment Area* (Figure 3).

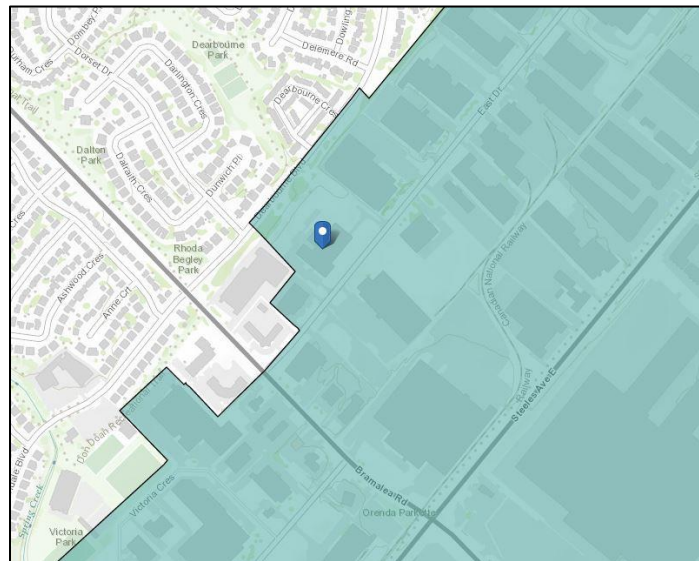


Figure 2: Provincially Significant Employment Zone 14

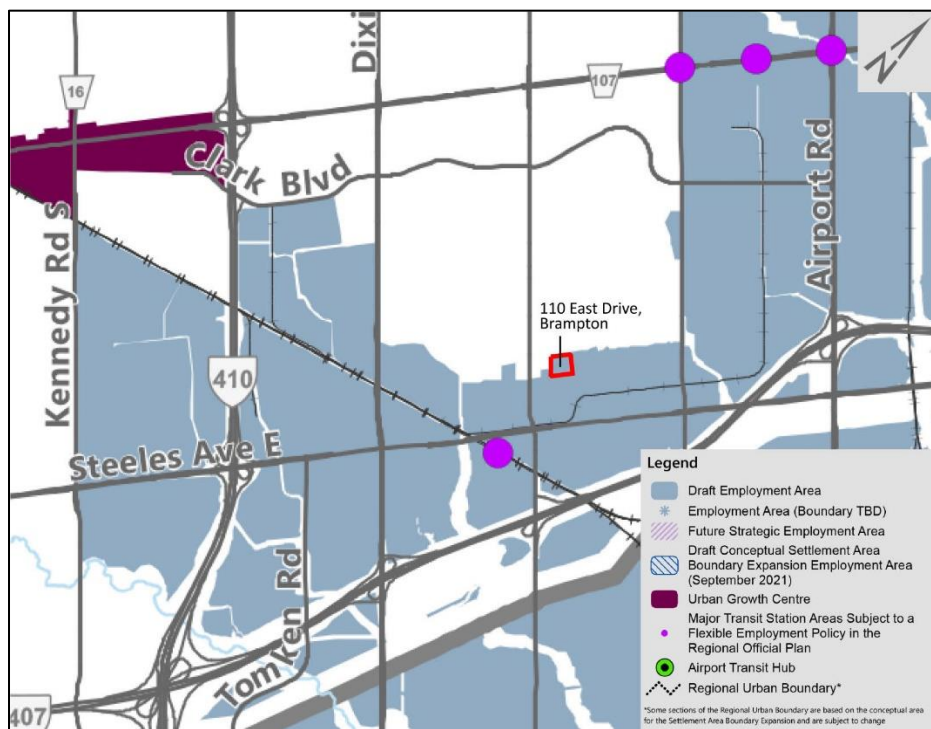


Figure 3: Draft Schedule Y6 (Employment Areas)

The Region has also released mapping with proposed Major Transit Station Areas (MTSA) across the Region. Draft Schedule Y7 (Major Transit Station Areas) identifies the subject property as being within close proximity of a proposed Priority Major Transit Station Area (MTSA) (Figure 4). However, the Region of Peel's *MTSA Profiles Report Part 1* dated December 2020 identifies the subject property as being within the Bramalea GO Draft MTSA

(Figure 5) and recommends a minimum density target of 150 residents and jobs combined per hectare. According to the *Phase 1B Report* dated December 2020, the minimum density target of the Bramalea GO MTSA may not be met unless the land use designations are updated through an MCR. The report states that additional residential uses may be required to meet the target.

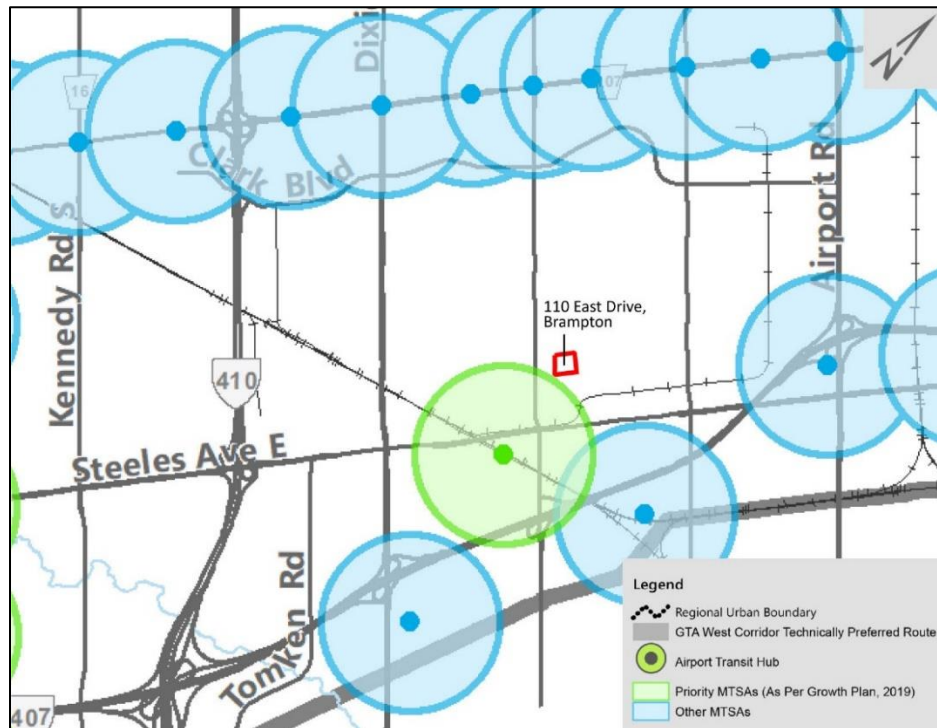


Figure 4: Draft Schedule Y7 (Major Transit Station Areas)

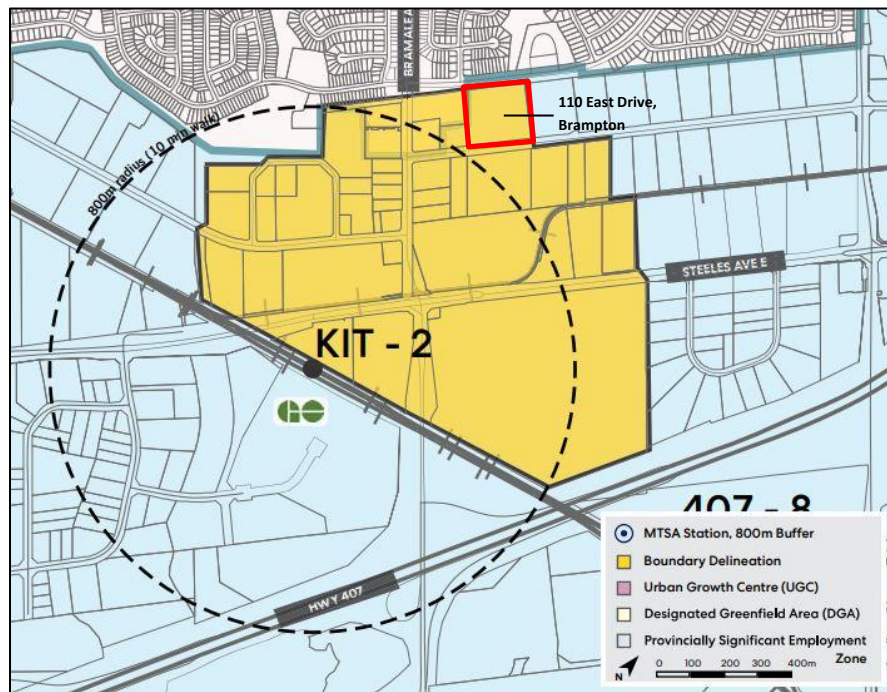


Figure 5: Bramalea GO draft MTSA from the MTSA Profiles Report

Within the Brampton Official Plan, (BOP), the subject property is located within an *Employment* area and a *Gateway Mobility Hub* according to Schedule 1 (City Concept) (Figure 6). The BOP defines *Gateway Mobility Hubs* as areas that are planned to “*accommodate a concentration of higher density residential and/or commercial, institutional and employment development and share all other characteristics except that they have regional significance due to their connection to centres outside the region, and are therefore planned to accommodate more growth than Major Transit Station Areas (Section 3.2.5.1 of the BOP).*”

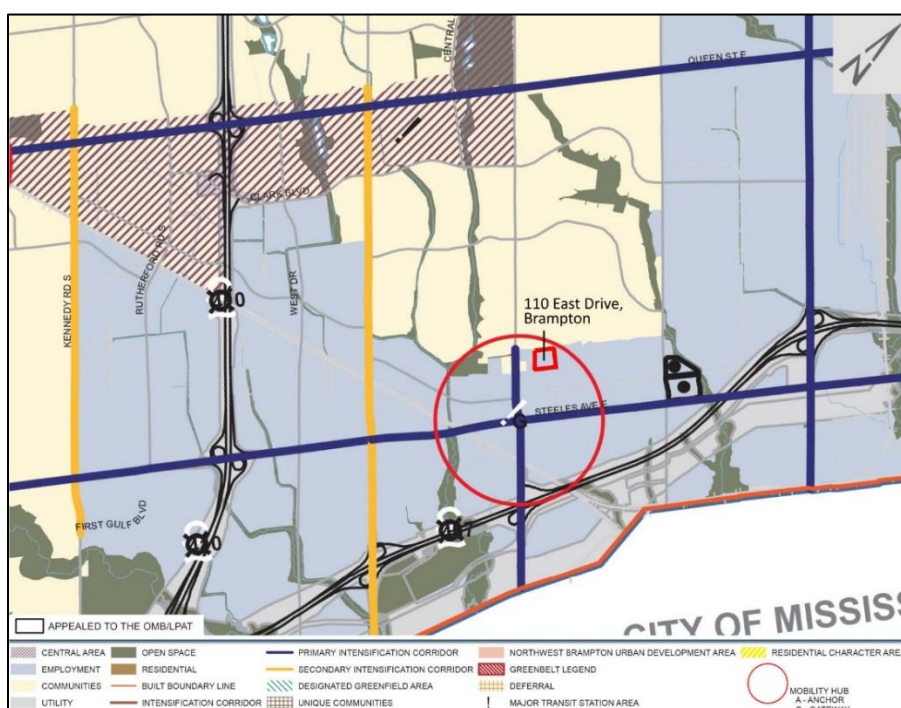


Figure 6: Schedule 1 (City Concept) of the Brampton Official Plan

In accordance with Policy 3.2.5.1.1, lands within a *Gateway Mobility Hub* should be planned to accommodate 100 to 150 people and jobs combined per hectare, which is consistent with the proposed density target of the Bramalea GO draft MTSA provided in the *MTSA Profiles Report*. In addition, Policy 4.5.4.31 directs the City to promote “*transit supportive land uses at existing and future GO stations identified as Gateway Mobility Hubs by planning for higher density residential and employment development within walking distance from the station*” suggesting that both residential and employment uses can exist within the same area. The *Gateway Mobility Hub* policies in the BOP reflect the proposed MTSA policies in the draft ROPA discussed in greater detail below and support the addition of residential uses on the subject property.

The subject property is designated *Industrial* according to Schedule A (General Land Use Designations) of the BOP (Figure 7). Residential uses are not permitted within the *Industrial* designation, however, the BOP provides policy direction to ensure that existing residential uses within an employment area will be compatible with the surrounding employment uses. According to Policy 4.4.2.16, “*the City may, where existing residential uses are located in an area designated for employment uses, refuse to permit lands abutting and adjacent to these residential uses to be developed for industrial uses until those lands can be developed in conjunction with the residential lands for such business or industrial purposes.*” The intent of Policy 4.4.2.16 is to allow for residential uses to exist with employment uses and ensure appropriate consideration is given to support the long-term viability of both uses. BOP Policy

4.4.2.17 directs the city to consider development within *Industrial* designations abutting residential or other sensitive uses to have regard for the following criteria:

- i) *No outside storage;*
- ii) *Not likely to generate air pollution, odour or excessive noise; and,*
- iii) *Will meet a high standard of building design and landscaping.*

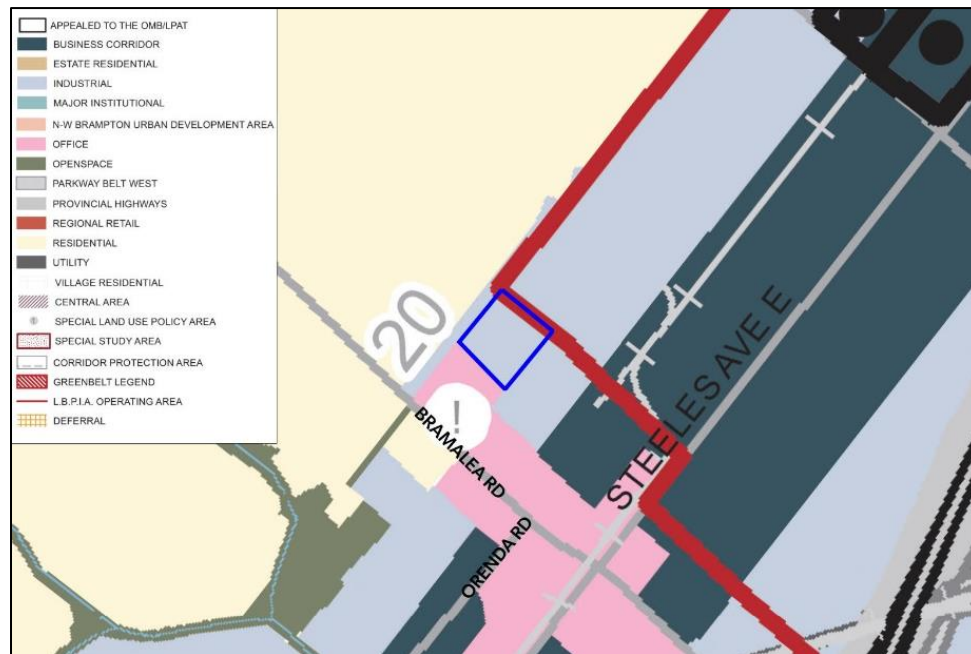


Figure 7: Schedule A (General Land Use) of the Brampton Official Plan

Taken together, Policies 4.4.2.16 and 4.4.2.17 highlight the way in which the BOP contemplates residential uses in conjunction with and adjacent to employment uses, specifically those in areas designated *Industrial*. Policy 4.4.2.17 ensures that industrial development is compatible with residential development by limiting the exposure of any nuisances or adverse impacts from an industrial property onto a residential property. The subject property is located in an area that has residential uses in close proximity to industrial uses as shown in Figure 1 above. This existing condition demonstrates that residential uses are compatible with the surrounding industrial uses and that this request for an employment conversion to permit residential uses on the subject property will not create a new condition.

According to Policy 4.4.2.18 of the BOP, an Official Plan Amendment to permit a non-employment use on lands designated *Industrial* shall only be considered based on a municipal comprehensive review which shall demonstrate that:

- i) *There is a need for the conversion;*
- ii) *The City will meet the employment forecasts as set out in Section 2 of this Plan;*

- iii) *The conversion will not adversely affect the overall viability of the employment area and achievement of the intensification target density targets and other policies of this Plan;*
- iv) *There is existing or planned infrastructure to accommodate the proposed conversion;*
- v) *The lands are not required over the long term for the employment purposes for which they are designated; and,*
- vi) *Cross-jurisdictional issues have been considered.*

With respect to Policy 4.4.2.18 (i) and 4.4.2.18(v), the Region has prepared a Draft Land Needs Assessment (LNA) report to determine the amount of land required to accommodate future population and employment growth to the year 2051 in accordance with Growth Plan requirements. The LNA, which is discussed in greater detail below, demonstrates that there is a need for an employment conversion to meet population density targets and that there is sufficient land in other areas of the Region available to accommodate the employment target. Policy 4.4.2.18(ii) is satisfied as the proposed employment conversion does not seek to remove the employment use permission associated with the subject property, rather it seeks to add *Residential* as a permitted use. The proposed mixed use composition will not destabilize the surrounding employment area given there are existing residential uses in the area. Further, the long-term vision for the area to transition to a higher density mixed use as established in the Bramalea Mobility Hub Secondary Plan and the proposed Bramalea GO draft MTSA. This is discussed in greater detail below. BOP Policy 4.4.2.17 ensures that any proposed industrial use adjacent to residential uses will be compatible to ensure the long-term viability of the employment area and the residential neighbourhood. Policy 4.4.2.18(iv) is satisfied as the subject property is located within a proposed MTSA and adjacent to existing residential dwellings. The December 2020 *Phase 1B Report* analysis the Infrastructure Capacity Costs related to current water, wastewater and stormwater infrastructure to determine the costs of undertaking utility upgrades to meet the minimum density target. Infrastructure Capacity Costs are categorized into low, medium and high. The Bramalea GO MTSA Infrastructure Capacity Costs is determined to be “medium”. According to the report, *“where MTSA did not meet density targets and existing water and wastewater systems are present, costs were assessed as medium”*. Servicing capacity for a proposed mixed use building will be confirmed through the formal development review process. Finally, there are no cross jurisdictional issues with this employment conversion request in accordance with Policy 4.4.2.18(vi).

Policy 4.4.2.21 permits the City to deny applications for the development of residential and other sensitive land uses within and adjacent to designated industrial areas if such approval would result in these industrial uses ceasing to be in compliance with all pertinent standards or would inhibit development of designated industrial lands for the purposes permitted by the BOP. This policy pertains to heavy industrial uses and there are no heavy industrial uses located near the subject property. As such, there are no compatibility issues with the employment area conversion request.

The subject property is designated *Mixed Industrial Commercial* within the Bramalea Mobility Hub Secondary Plan (BMHSP) (Figure 8). The *Mixed Industrial Commercial* designation provides for activities that may combine industrial processes with commercial uses. A limited range and amount of retail, service and office uses are permitted. There is one area within the BMHSP designated *High Density Residential*, which pertains to the existing residential development on the west side of Bramalea Road discussed above. This demonstrates that residential uses are already co-existing within the BMHSP with the adjacent employment uses and there are no known compatibility issues.

The BMHSP is intended to be a transit-supportive hub that will be redeveloped over time with higher density mixed-uses and will represent a gateway into the City of Brampton. Over the medium and long-term, existing older, industrial/commercial uses in the area are intended to transition to higher order mixed uses in accordance with provincial policy. The objective and vision of the BMHSP is reflected in the Bramalea GO draft MTSA and the *Gateway Mobility Hub* classifications. In addition, the BMHSP states that the potential introduction of additional high density residential uses in the secondary plan area will be evaluated as part of the next MCR and restricts such uses that would be incompatible with the existing industries. The BMHSP protects the future redevelopment of the area by restricting incompatible uses such as heavy industrial operations. Finally, non-traditional and/or non-employment uses are already considered within the land use designation through Policy 4.4.2.5 of the BOP, which states that through Secondary Planning, the *Industrial* designation will be further refined into various sub-designations and that specific policies will be set out with respect to office, retail and service uses, and restaurant uses.

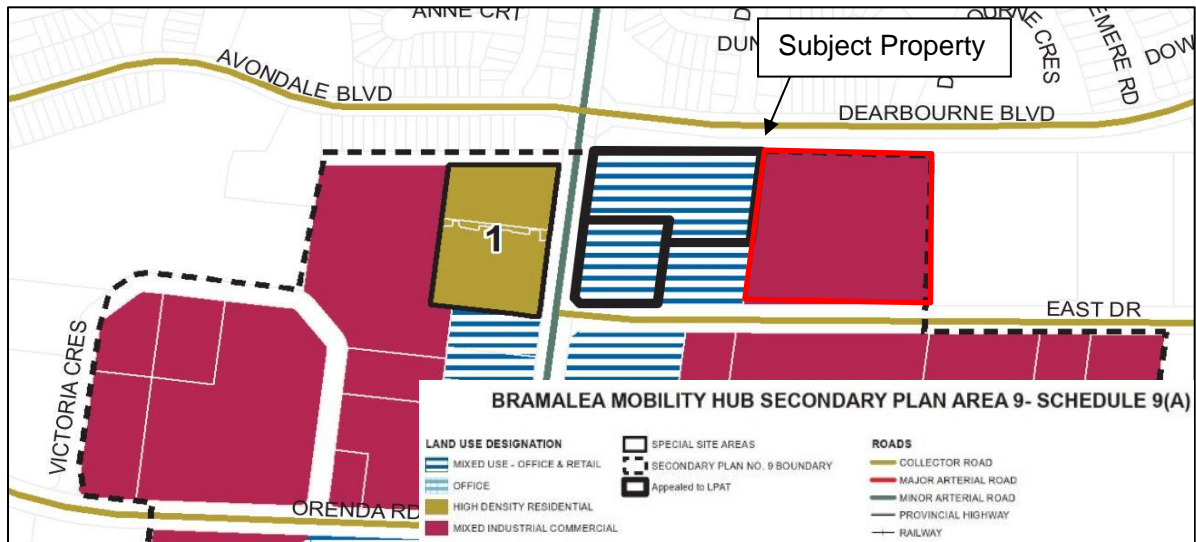


Figure 8: Schedule 9A (Land Use Designation) Bramalea Mobility Hub Secondary Plan

The subject property is zoned *Industrial Two (M2)* under Zoning By-law 204-2010. Residential uses are not permitted within the M2 zone.

Emerald Heights Community Minister's Zoning Order

At the City of Brampton Planning and Development Committee Meeting dated October 18, 2021, Council considered an application for the Emerald Heights Community, a 15 hectare area located within the proposed Bramalea GO MTSA boundary and the BMHSP. The proposed Emerald Heights Community area includes the subject property.

The objective of the Emerald Height's Community is to transform the area *"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 (Delta Urban Cover Letter dated October 18, 2021)"*. The proposed Emerald Heights Community will support intensification within the Bramalea GO draft MTSA and contribute to the shortfall in density targets projected by the Region of Peel, which is targeted for 150 people and jobs per hectare. Redevelopment will accommodate a higher-density built form that will serve as an urban gateway into the City of Brampton, which is consistent with BOP policy related to the Gateway Mobility Hub.

The applicant of the Emerald Height's Community' requested Council's consideration for a resolution endorsing and supporting a Minister's Zoning Order (MZO) for the implementation of the proposal. Council endorsed the MZO but it is our understanding that the endorsement has not yet been forwarded to the Minister of Municipal Affairs and Housing for approval as the implementing Zoning By-law has not been finalized.

The employment conversion request for the subject property is consistent with the intent of the proposed MZO for the Emerald Height's Community. It is our understanding that the MZO, if approved by the Minister, will achieve the objective of this employment conversion request and the requirement to proceed via the Region's MCR process would not be required. In addition, if this MZO is approved, it will dictate how the Bramalea GO MTSA is to be developed.

Policy Context

Provincial Policy Statement 2020

The Provincial Policy Statement (PPS) came into effect on May 1, 2020, and provides policy direction on matters of provincial interest related to land use planning and development across the province. One of the primary objectives of the PPS is to plan for and protect employment areas to secure jobs, promote economic development and competitiveness, and achieve long-term prosperity and social well-being. All planning decisions in Ontario must be consistent with the PPS.

The PPS defines employment areas as *"those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities."* The purpose of this employment conversion request is to maintain employment uses including limited commercial and office uses on the subject property, which supports the economic development policies outlined in the PPS, and to introduce a residential use component as part of the mixed use composition of the development for the site.

The subject property is located in an area of the city characterized by commercial and warehouse uses. Policy 1.3.2.2 of the PPS directs planning authorities to:

"...assess employment areas identified in local official plans to ensure that this designation is appropriate to the planned function of the employment area."

Employment areas planned for industrial and manufacturing uses shall provide for separation or mitigation from sensitive land uses to maintain the long-term operational and economic viability of the planned uses and function of these areas."

The intent of Policy 1.3.2.2 is to ensure separation of industrial and manufacturing facilities from sensitive uses to maintain the long-term viability of employment uses. The subject property is located within proximity to existing residential uses, including high-rise towers to the west and a low-rise neighbourhood to the north. These residential uses have not been impacted by the employment uses in the area, demonstrating how both uses are compatible and are able to co-exist. The existing condition of this area is consistent with the long term

vision and objective of the BMHSP, which is to transition to a mixed use area. In addition, the Gateway Mobility Hub classification contemplates residential uses, further supporting the objective of allowing for residential uses on the subject property. As such, Policy 1.3.2.2 is satisfied.

The PPS permits the conversion of lands within employment areas to non-employment uses through a comprehensive review subject to specific criteria. In accordance with Policy 1.3.2.4, planning authorities must demonstrate that the land is not required for employment purposes over the long term and there is a need for the conversion. This request intends to maintain the subject property's employment use permissions and expand the permissions for the subject property to allow for residential uses as a component of a mixed use development for the site.

Policy 1.3.2.5 of the PPS permits lands within employment areas to be converted to a designation that permits non-employment uses outside of an MCR process provided the area has not been identified as a PSEZ. This policy must be considered in the context that this conversion request is being made through the Peel Region MCR process.

The Region of Peel 2051 Draft Land Needs Assessment Report, which was presented to the Peel Region Planning and Growth Management Committee on September 2, 2021, finds that employment in Peel over the next 30 years is expected to be supported by more urban forms of job growth, with Mississauga and Brampton continuing to intensify existing employment areas and shift focus to jobs that *"can be accommodated in more compact mixed use contexts such as Major Office and Population-Related Employment jobs."*¹ The introduction of residential uses on the subject property will support this type of development and contributes to the existing residential component of the area. This is identified as a policy priority of the PPS and supports the way in which employment is changing across the Region and within the City of Brampton.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019

The Growth Plan provides direction related to the development and growth of communities within the Greater Golden Horseshoe (GGH). Section 2.2.5 of the Growth Plan identifies policies related to employment and specifies that employment land conversions can only be considered at the time of an MCR (Section 2.2.5.9), though Section 2.2.5.10 does allow for conversions to be considered outside of an MCR, subject to specific criteria. The request to develop the subject property to include non-employment uses is provided as part of the ongoing Regional MCR and is considered appropriate within the context of Section 2.2.5 of the Growth Plan.

¹ Region of Peel 2051 Land Needs Assessment Report, Page 70

Section 2.2.5.9 provides the minimum criteria for assessing requests for the conversion of employment lands. This Section directs that:

The conversion of lands within employment areas or prime employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- a) there is a need for the conversion;*
- b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;*
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;*
- d) the proposed uses would not adversely affect the overall viability of the employment area or prime employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and*
- e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.*

The Land Needs Assessment Report states that an additional 272,000 dwelling units will be required in the Region to meet the population growth target. The proposed employment conversion, if granted, would provide residential density on the subject property and maintain the existing employment use permissions as part of any future mixed use development thereby demonstrating a need for the conversion in accordance with Policy 2.2.5.9(a). Furthermore, Policy 2.2.5.9(b) and (c) are satisfied as a future mixed use development will ensure that forecasted employment growth can still be met as existing employment permissions and uses are not being removed from the subject property.

The subject property is located within the Bramalea GO draft MTSA boundary and at the edge of a Provincially Significant Employment Zone (PSEZ). According to Policy 2.2.4.3(c) of the Growth Plan, MTSA's are to be planned for "150 residents and jobs combined per hectare for those that are served by the GO Transit rail network." Amendment 1 to the Growth Plan introduced 31 Provincially Significant Employment Zones (PSEZ) that identify areas of high economic output and are strategically located to provide stable, reliable employment across the region. The subject property is located at the edge of PSEZ Zone 14 according to Provincial mapping (Figure 2 above). The Growth Plan defines a PSEZ as,

areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. Provincially significant employment zones can consist of employment areas as well as mixed-use areas that contain a significant number of jobs.

The employment area conversion request will not adversely affect the viability of the employment area. The subject property is located at the edge of a PSEZ and adjacent to a residential neighbourhood and within proximity to residential buildings, which demonstrates compatibility between uses. In addition, the introduction of residential use on the subject property will contribute to the Growth Plans residential density targets for MTSA's and investment in transit infrastructure. The location of the subject property within a PSEZ does not preclude residential density. The intent of PSEZs is to protect existing employment areas, which can be achieved with the inclusion of residential uses. Provincial policies indicate that MTSA's must achieve a minimum density target of people and jobs and the proposed employment conversion request, which does not seek permission for a stand-alone residential building, considers the unique characteristics of the subject property.

Summary

Provincial policy contained in the PPS and the Growth Plan provide direction to protect and enhance employment areas in Ontario to promote job growth, protect industrial and manufacturing facilities, and encourage long-term economic prosperity across the province. The intent of these policies is to ensure the province has enough land available to meet projected employment growth. At the same time, the PPS and Growth Plan allow for the conversion of employment areas to permit non-employment uses provided certain criteria are met. This includes protecting major facilities and ensuring that municipalities can still meet their employment growth projections.

Taken together, the policies represent a balance of consideration with respect to economic job growth and population growth. The request for an employment conversion further represents this balance of consideration by maintaining the site's existing employment use permissions and allowing for a future mixed use composition. The addition of residential uses on the site will support the existing employment uses. Based on this analysis, it is our opinion that the request for an employment conversion appropriately considers the PPS and Growth Plan policies in the context of the Region's MCR process.

Regional Policy

The in-force ROP does not currently map employment designations, however Policy 5.6.2.6 outlines the employment areas that are to be protected and supported across the Region. In Brampton, this includes Office, certain Business Corridor lands, and Industrial, which captures the location of the subject property. In accordance with Policy 5.6.2.8, the conversion of lands within these employment areas to non-employment uses is only permitted through an MCR and must demonstrate:

- i. There is a need for conversion;*

- ii. *The Region and area municipality will continue to meet the employment forecasts of this Plan;*
- iii. *The conversion does not affect the overall viability of the employment area and the achievement of intensification and density targets;*
- iv. *There is existing or planned infrastructure to accommodate the proposed conversion;*
- v. *The lands are not required over the long-term for employment purposes;*
- vi. *The lands do not fulfill the criteria for provincially significant employment lands;*
- vii. *The lands do not affect the operations or viability of existing or permitted employment uses on nearby lands; and*
- viii. *Cross jurisdiction issues have been considered.*

The criteria for an employment conversion outlined in Policy 5.6.2.8 of the ROP builds on the criteria outlined in Section 2.2.5.9 of the Growth Plan and expands the list of criteria. Policy 5.6.2.8(i) to (iii) have been discussed in the above section related to the Growth Plan and are satisfied as the conversion request seeks to maintain employment uses including limited commercial and office use permissions.

With respect to Policy 5.6.2.8(vi), the subject property is located at the edge of a PSEZ and within proximity to existing residential uses. The employment conversion request seeks to add a residential component to the subject property and maintain limited employment uses such as office and commercial within a designated *Gateway Mobility Hub* and a proposed MTSA. These designations contemplate future mixed use development, including residential. The addition of residential uses will not affect the operations or viability of existing employment uses on nearby lands in accordance with Policy 5.6.2.8(vii), as demonstrated by the existing residential uses in the area, and there are no cross jurisdictional issues with this employment request in accordance with Policy 5.6.2.8(viii). The request for employment conversion satisfies the criteria of the ROP.

The draft Regional Official Plan Amendment identifies MTSA as areas that will create a compact urban form with a diverse mix of land use, housing types, employment, and amenities to support existing and planned transit. It is recognized that each station will be unique and influenced by its local context, growth potential and limitations. It is also recognized that the 800 metre radius around station or stops *“is used as the initial area to be assessed when Major Transit Station Areas are identified and to guide delineation (Section 5.6.19).”* According to draft Schedule Y7, the subject property is identified as being outside the 800 metre radius of a Priority MTSA that is subject to flexible employment policies in the ROPA, however the *2020 MTSA Profile Report* dated December 2020 identifies the subject property as within the Bramalea GO MTSA (Figure 5 above). Policy 5.8.32 of the draft ROPA states that Employment Areas within delineated Major Transit Station Areas on Schedule Y7 (Employment Areas) *“have the potential to support the integration of Employment Areas with non-employment uses to develop vibrant, mixed use areas, and innovation hubs”*. This includes such uses as retail, residential, commercial, and non-ancillary uses subject to specific criteria set out in the draft ROPA.

In accordance with Policy 3.2.5.1.1 of the BOP, lands within a *Gateway Mobility Hub* should be planned to accommodate 100 to 150 people and jobs combined per hectare, which is consistent with the density target of the Bramalea GO draft MTSA. In addition, Policy 4.5.4.31 directs the City to promote “*transit supportive land uses at existing and future GO stations identified as Gateway Mobility Hubs by planning for higher density residential and employment development within walking distance from the station.*” The *Gateway Mobility Hub* policies in the BOP reflect the proposed MTSA policies in the draft ROPA and support the addition of residential uses on the subject property. The subject property is located within a proposed MTSA area and is within the *Gateway Mobility Hub*. As such, an employment conversion request to permit non-employment uses on the subject property is appropriate.

Peel Region 2051+ Municipal Comprehensive Review

Peel 2051+ is being undertaken as a Municipal Comprehensive Review (MCR) exercise to ensure conformity to provincial plans, policies and legislation, and to address emerging planning issues affecting the Region of Peel. The Region has prepared a Draft Land Needs Assessment (LNA) report to determine the amount of land required to accommodate future population and employment growth to the year 2051 in accordance with Growth Plan requirements.

On August 28, 2020, the Minister of Municipal Affairs approved an updated LNA Methodology to ensure there is sufficient land available within municipalities to meet forecasted growth in Schedule 3 of the Growth Plan 2019, including population growth and employment. According to Schedule 3 of the Growth Plan, the Region of Peel is forecasted to accommodate an additional 700,000 people and 335,000 jobs between 2021 and 2051. Approximately 272,000 new dwelling units will be required to support forecasted growth in Peel².

The LNA Report finds the Region of Peel is approaching build-out of its remaining designated greenfield area (DGA) lands and growth within the existing settlement areas will require the build out of the remaining DGA lands in the City of Mississauga and the City of Brampton to accommodate forecasted growth. According to the Report, “*the communities of Brampton and Mississauga will not have the supply of land available in previous decades to accommodate low density units*”³ suggesting that high density development within the built boundary will play an important role in accommodating future growth.

The historical pattern of housing growth in the Region has been single- and semi-detached units that has been driven by market preference and availability of land supply. According to the Report, the municipalities of Mississauga and Brampton, which represent 95% of the total population of Peel, have begun to move towards a development framework that is centred on

² Region of Peel 2051 Draft Land Needs Assessment Report, Page 46

³ Region of Peel 2051 Draft Land Needs Assessment Report, Page 41

*“compact, transit supportive patterns of growth.”*⁴ This pattern of high-density growth supports the objectives of the PPS and the Growth Plan. The number of dwellings required to support forecasted growth, coupled with the lack of available DGA, results in a situation where high-density development will be required to support future job and population growth. This request for a conversion of the subject property presents an opportunity to meet this objective and contribute to the future demand for high-density development by supporting non-employment uses on the site, including residential uses, while still supporting future employment growth that is shifting towards urban forms of job growth.

The LNA Report describes a shift in employment opportunities across the Greater Toronto and Hamilton Area (GTHA) in terms of how people choose to work and the location of job opportunities. A greater proportion of jobs in Peel *“will be captured in the service-knowledge based sectors and the demand for industrial space to accommodate warehousing will continue in areas with locational advantages to transportation infrastructure.”*⁵ Employment in Peel over the next 30 years is expected to be supported by urban forms of job growth, with Mississauga and Brampton continuing to intensify existing employment areas and shift focus to jobs that *“can be accommodated in more compact mixed use contexts such as Major Office and Population-Related Employment jobs.”*⁶ Furthermore, the Peel economy is shifting from “goods production” to “goods movement” that is characterized by greater warehouses and distribution centres and fewer manufacturing plants. While employment land employment uses are still expected to play a major role in Peel, its share of the total employment growth is expected to be lower than historical levels⁷. The Town of Caledon is the only municipality in Peel that will be able to accommodate growth in employment uses that are restricted to employment areas on newly designated greenfield lands.

As employment in Peel Region and the City of Brampton shifts towards more urban forms of employment and services, the need for compact, mixed use communities will become more pertinent to support this type of growth. The location of the subject property within a *Gateway Mobility Hub* and adjacent to existing residential uses will support this shift. Employment area land can be accommodated in the Town of Caledon which is currently seeking to expand its urban boundary to add additional employment land.

Peel Region Employment Area Conversion Policies/Draft ROPA Policies

The Region has proposed draft ROPA policies and mapping to permit non-employment uses in *Employment Areas*. According to Draft Schedule Y6 (Employment Areas) (Figure 3 above), the subject property is located within a proposed *Employment Area*. Draft ROPA policies permit additional non-employment uses in select areas, particularly in areas facing transition

⁴ Region of Peel 2051 Draft Land Needs Assessment Report, Page 42

⁵ Region of Peel 2051 Draft Land Needs Assessment Report, Page 42

⁶ Region of Peel 2051 Draft Land Needs Assessment Report, Page 70

⁷ Region of Peel 2051 Draft Land Needs Assessment Report, Page 71

and development in the future. In these areas, the underlying employment designation will be maintained in the ROPA and policies to permit additional non-employment uses are added. In accordance with Draft Policy 5.8.31, local municipalities can accommodate new retail and commercial uses in *Employment Areas* by designating lands *Business Corridor* in Brampton. The subject property is designated *Industrial* and limited office, retail and service commercial uses are permitted. This request for an employment conversion seeks to maintain the subject property's existing employment use permissions and simply add a residential use permission to the property to support the development of the site for a mix of employment and residential uses.

Meetings with Staff

On November 22, 2021, Weston Consulting conducted a meeting with Staff at the Region of Peel, including Tara Buonpensiero, Manager, Policy and Development, Joy Simms, Principal Planner, Policy and Development, and Duran Wedderburn, Principal Planner, Policy and Development. The purpose of the meeting was to introduce Staff to the subject property and provide an overview of the employment conversion request. Staff provided a summary of the Region's work completed with respect to the LNA and Employment Strategy and confirmed that conversion requests are being considered through the MCR process. Regional Staff also confirmed that the subject property's location within an MTSA and strategic growth area provides flexibility to consider non-employment uses and that the local municipality will be required to determine the long-term vision for the subject property and MTSA area.

On November 23, Weston Consulting conducted a meeting with City of Brampton Staff, including Claudia LaRota Principal Planner/Supervisor, Policy, Programs and Implementation and Bindu Shah, Principal Planner/Supervisor, Growth Management & Housing, City Planning and Design. At this meeting, Staff advised that Council endorsed the MZO for the Emerald Height's Community area but that an implementing Zoning By-law has not been released to the public and the MZO has not yet been forwarded to the Minister for approval. Residential permissions are being considered throughout the MZO area and it is our understanding that, should the MZO be approved, there is no need for Staff to undertake a detailed design of the MTSA.

Conclusion

This correspondence is being submitted to request that the subject property be considered for an employment area conversion to allow a mixed use development on the subject property, specifically to permit residential uses on the site. It is our opinion that this letter demonstrates that the proposed request considers the policies of the PPS and Growth Plan and draft ROPA policies.

We kindly request to be notified of any future reports and meetings and will continue to monitor the MCR process as well. Thank you for the opportunity to provide this letter and we would

be open to future discussions regarding the development of the subject property should there be any opportunities for this.

We reserve the right to provide additional comments throughout this process. Should you have any questions, please contact the undersigned (ext. 241) or Jenna Thibault (ext. 309).

Yours truly,

Weston Consulting

Per:



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