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April 26, 2022

Chair and Members of Council  
Region of Peel  
10 Peel Centre Drive, Suite A & B  
Brampton, ON  
L6T 4B9

REFERRAL TO \_\_\_\_\_  
RECOMMENDED \_\_\_\_\_  
DIRECTION REQUIRED \_\_\_\_\_  
RECEIPT RECOMMENDED  \_\_\_\_\_

Via email: [council@peelregion.ca](mailto:council@peelregion.ca)

Dear Chair and Members of Council

**RE: PEEL REGION OFFICIAL PLAN AND MUNICIPAL COMPREHENSIVE REVIEW  
REGION OF PEEL COUNCIL AGENDA ITEMS 8.1 AND 11.1  
MHBC FILE: 9519Y**

MacNaughton Hermsen Britton Clarkson Planning Limited (“**MHBC**”) are retained by Morguard Corporation (“**Morguard**”) with respect to the Bramalea City Centre (“**BCC**”) located at 25 Peel Centre Drive, Brampton and a group of commercial / employment properties also in Brampton (“**410 / Steeles Lands**”) that are generally bound by Kennedy Road, Steeles Avenue East, Rutherford Road South and existing employment lands as shown below.



Bramalea City Centre



410 / Steeles Lands

In addition to the letter submitted by Wood Bull LLP on April 12, 2022, MHBC has reviewed the Draft Region of Peel Official Plan, April 2022 (the “**Draft ROP**”) and have the following concerns that we request be addressed on behalf of Morguard prior to adoption of the Draft ROP:

- 1) Policy 5.6.19.14 reads as follows:

*“Ensure existing surface parking lots and other land uses within Major Transit Station Areas that do not meet the objectives of this Plan will be encouraged to redevelop and expansions to existing uses shall be managed in accordance with transition policies incorporated in the local official plan”*

We appreciate the incorporation of transition language into this policy. However, the transition language should be strengthened with respect to existing major commercial land uses like the BCC to ensure that the shopping centre is able to evolve over time to respond to market demands, including through the introduction of new commercial buildings. Therefore, the policy should acknowledge that existing shopping centres shall be allowed to continue to develop and expand for commercial purposes.

Physical commercial and retail stores are increasingly becoming more vulnerable to changes in the retail ecosystem and thus it is important to ensure that flexible policies are applied to this type of land use to ensure that physical locations can remain operational as the market changes.

- 2) Policy 5.6.19.18 reads as follows:

*“Until such time as the local municipality has established Major Transit Station Area policies in accordance with Section 16(16) of the Planning Act and Policy 5.6.19.9, proposed developments within a Major Transit Station Area identified on Schedule E-5 shall be reviewed with consideration to the objectives of this Plan to ensure the proposed development:*

*c) Addresses Regional and local municipal housing policies to provide a range and mix of housing options and densities, including affordable housing.”*

This policy appears to read and may be construed as requiring all development within Major Transit Station Areas (**MTSAs**) to provide a range of housing options including affordable housing. Although it is important to ensure an adequate supply of different housing options, the expectation to provide *affordable housing*, as defined, in every new development ahead of the implementation of a local MTSA policy framework may pose a significant constraint to development. It should be noted that Policies 5.6.19.9 and 5.6.19.10 do not reflect this requirement and leave it up to local municipalities to implement this requirement through a comprehensive planning process for each MTSA. Additionally, it is unclear how this policy would be interpreted for new commercial development without a residential component which may occur at BCC as the shopping centre evolves over time. We request that this policy be amended to clarify that the objectives noted with respect to housing options and affordable housing are only a consideration for residential or mixed use development prior to the implementation of a local MTSA policy framework as opposed to an expectation for any development.

3) Policy 5.9.39 reads as follows:

*“Direct the local municipalities to establish an official plan policy framework to implement inclusionary zoning where deemed appropriate by the local municipality through zoning by-laws in primary Major Transit Station Area and secondary Major Transit Station Areas delineated on Schedule E-5 as per Policy 5.6.19.6, and in community planning permit system areas, as ordered by the Minister;*

*i) consider transitioning and phasing when implementing inclusionary zoning as appropriate based on market and other local conditions.”*

The transition and phasing policy is critically important for the introduction of any major policy shift, including introduction of inclusionary zoning. Therefore, we suggest that this policy be strengthened to require a transition and phasing policy for the implementation of inclusionary zoning as opposed to just a consideration for it.

4) The Draft ROP contains a number of policies addressing retail and Major Retail land uses within employment areas that generally discourage these uses or prohibit them outright in the case of Major Retail. However, it is important that the policy framework explicitly acknowledge that there are existing Major Retail uses within employment areas that consist of large shopping centres. The 410 / Steeles Lands contain a shopping centre with approximately 30,000 square metres of commercial space including yet to be developed building sites for smaller commercial buildings. These lands have been approved for commercial / retail land uses in the local official plan and have developed as a planned shopping centre over time. As such, policies in the Draft ROP need to explicitly acknowledge the existence of such shopping centres and support their continued operations by permitting on-going modifications, alterations and expansion as well as the build out of future commercial / retail buildings that may be over 1,000 square metres.

We appreciate your consideration of these comments. If you require any additional information, please do not hesitate to contact us.

Yours Truly,  
**MHBC**



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Partner



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Associate