

December 9<sup>th</sup>, 2020Sent via email <[regional.clerk@peelregion.ca](mailto:regional.clerk@peelregion.ca)>

Regional Municipality of Peel  
10 Peel Centre Drive, Suite A and B  
Brampton, ON L6T 4B9

Attention: Regional Municipality of Peel  
Chairman and Members of Council

**Re: Region of Peel Council December 10, 2020**  
**Lark Investments Inc.**  
**Bramalea GO Station**  
**City of Brampton, Region of Peel**

**RECEIVED****December 9, 2020**REGION OF PEEL  
OFFICE OF THE REGIONAL CLERK

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

Delta Urban Inc. is the consultant representing Lark Investments Inc. (the "Client") with respect to lands they own at the northwest corner of Bramalea Road and Steeles Avenue East ("Subject Lands"). Our Client is a major stakeholder in the northwest quadrant of Bramalea Road and Steeles Avenue East. The Subject Lands are approximately 11.5 hectares in size and are known municipally as 10 Victoria Crescent; 376 Orenda Road; 387 and 391 Orenda Road; and 26 Victoria Crescent in the City of Brampton. The Client has assembled a consulting team to assist with the process of planning and redeveloping the Subject Lands; including:

- Delta Urban Inc. – Project Manager
- Gagnon Walker Domes Ltd. – Land Use Planning
- Altus Group – Land Economist
- SCS Consulting Group Ltd. – Civil Engineering

Our Client is working to expand the consulting team to include transportation/transit expertise.

On behalf of our Client, we have had the opportunity to review the material presented by Regional Staff at the Peel 2041+ Regional Official Plan Review meetings as part of the Municipal Comprehensive Review. We have also reviewed the 'Key Policies Draft Regional Official Plan Amendment and Council Report which is scheduled to be presented to Regional Council on December 10<sup>th</sup>, 2020.

In advance of the aforementioned meeting, we are pleased to provide comments for your consideration. Our Client is preparing to submit a formal request to the Region of Peel to re-designate the Subject Lands

to permit the development of residential/mixed uses. Our Client did not pursue this request earlier in order to avoid circumventing the Municipal Comprehensive Review process, although our Client's intent has been shared with Regional Staff. Regrettably, based on our review, it is evident that Regional Staff have not included residential/mixed uses on and within the vicinity of our Client's Lands. We are of the opinion that our Client's lands should be re-designated residential/mixed-use; on the basis that:

- The Subject Lands are within the Bramalea GO Station Major Transit Station Area ("MTSA") on Steeles Avenue East, as described in the preliminary MTSA Boundary Delineation that is identified in the Regional Staff Report from April 2020. Please refer to Map "A" for reference to the Subject Lands location and their proximity to the Bramalea GO Station.
- The Subject Lands are currently permitted to be developed for office and industrial uses.
- The proposed redevelopment would accommodate a mix of uses and it is projected that there is an opportunity to accommodate significantly more jobs on the Subject Lands. The redevelopment would not only provide more employment opportunities but would also provide a greater diversification of jobs.
- On a go-forward basis, in the area south of the railway tracks, west of Spring Creek more traditional office/industrial uses are most appropriate.
- The proposed conversion will increase on-site employment from 470 existing jobs to approximately 1,300 projected jobs (an increase in the order of almost 177%).
- Residential growth will provide for increased transit ridership and the utilization of the already existing Bus Rapid Transit service along the Steeles Avenue East corridor and the existing Bramalea GO Station through the provision of a mixed-use, transit-oriented, and complete community.
- Considering the geography of the Subject Lands and surrounding land uses; including existing residential to the north, Spring Creek to the west (which acts as a natural barrier from existing industrial uses), and retail/office and high-rise residential development to the east, the proposed conversion would allow for a seamless and gradual transition with the existing residential community.
- The proposed conversion will facilitate additional growth and a greater range of uses on the Subject Lands forming the basis of a complete community consisting of amenities for the surrounding community (both employment, commercial and residential), as well as multiple walkway connections to the Bramalea GO Station; which at present can only be accessed from Bramalea Road.
- Our opinion on the Bramalea GO Mobility Hub Study and those contained therein represent an opportunity to maximize and optimize the ability of the lands owned by our Client and their neighbours immediately north of the CNR to contribute to the implementation of the intent and purpose of the City of Brampton 2040 Vision.

In the Regional Staff Report and presentation from April 2020, the Bramalea GO Station is referred to as a 'priority' station with 'limited potential/low priority'. We recognize that the Region has conducted their analysis based on existing station conditions. We note that the Region is not recommending a conversion of the Subject Lands to support non-employment uses, but rather that the Subject Lands be designated

as Employment in the Regional Official Plan, as per draft Schedule Y-6 which designates the Subject Lands as 'Employment Area' (see Map "B"). However, we believe that this approach will be detrimental to the future of the Bramalea GO Station and the promising opportunity that our Client's vision represents for the Subject Lands and surrounding properties. While 'Appendix III – MTSA Draft Policies' to the December 10, 2020 Report designates the Bramalea GO Station as a 'Primary Station', we respectfully request confirmation on the 'priority level' being assigned to the Station at this time, and the types of land uses that would be accommodated.

The conversion request on the Subject Lands is supported by a multi-disciplinary consulting team and conforms with the criteria of the Growth Plan. Our Client has engaged the services of a professional land use planner, and land economist to review the impacts of the proposed employment land conversion. Their review concluded that the proposed employment land conversion conforms with the criteria of the Provincial Growth Plan and the Region of Peel as it facilitates: the development of a complete community; would not impact the supply of employment lands located south of the railway tracks beyond where the transition is taking place; would encourage greater job growth; support investments in public transit and; would not impact surrounding employment uses.

The consulting team engaged by our Client concluded that the expansion of permitted uses to include residential, along with retail/office on the Subject Lands, will fuel the critical mass needed to implement the Region of Peel and City of Brampton vision for this important District.

As noted in the MTSA Report, the Subject Lands are situated within a Major Transit Station Area ("MTSA"), which is required by Provincial Policy to achieve a minimum density target of 150 persons and jobs per hectare. The MTSA currently has a density of approximately 14 persons and jobs per hectare. In our opinion, increased density, along with a provision of residential and employment uses around a proposed MTSA and existing higher-order transit which exists at the intersection of Steeles Avenue East and Bramalea Road will lend support for the major financial contribution made by the government to the Steeles Avenue BRT, including the new multi-level parking structure located at the Bramalea GO Station.

Finally, a conversion will support the development of a robust, multi-faceted complete community, delivering additional services and facilities to the existing residents living in the vicinity of the Bramalea GO Mobility Hub. Increasing the scope and breadth of office and retail uses will expand goods, services, and employment opportunities for existing and proposed residents.

We appreciate your consideration and look forward to working with Regional Staff on the conversion issue and ultimately the re-designation and re-development of the Subject Lands through the MCR process.



Should you have any questions, please do not hesitate to contact the undersigned.

Yours Very Truly,

Delta Urban Inc.

Mustafa Ghassan

C.c.      Adrian Smith, Region of Peel  
            Duran Wedderburn, Region of Peel  
            Claudia LaRota, City of Brampton  
            Sajjad Ebrahim, Lark Investment Inc.  
            Michael Gagnon, Gagnon Walker Domes Ltd.

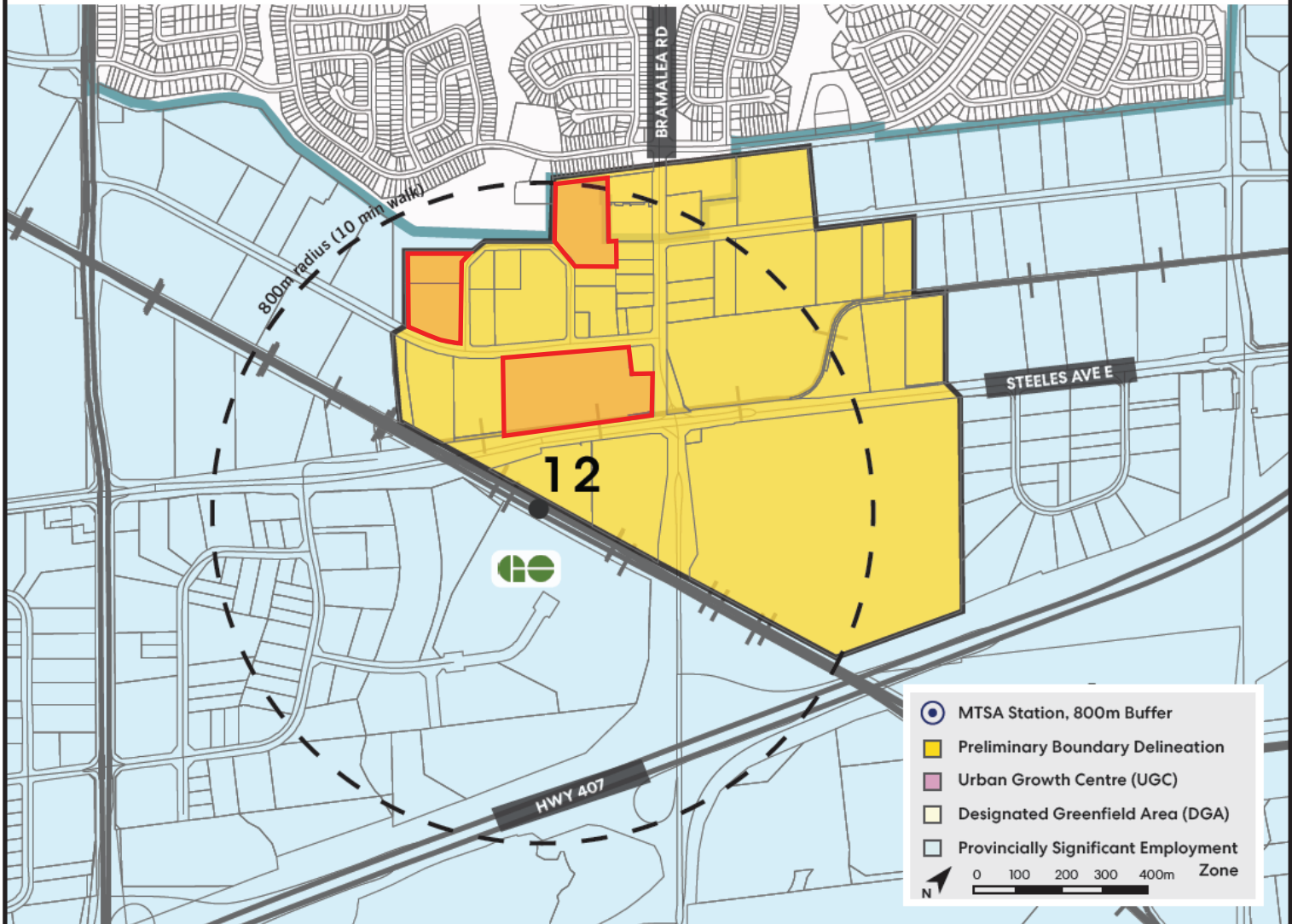
Attached:

- Map A – Subject Properties in reference to Bramalea GO
- Map B – Draft Schedule Y-6

## 12 / BRAMALEA GO

APRIL 16, 2020

 **Region of Peel**  
working with you



### MTSA Preliminary Boundary Delineation

Area (ha)	113
Population	89
Employment	1,488
Total Density (ppj/ha)	13.9

Additional People and Jobs to Achieve Target Density (ppj) 15,400

### MTSA 800m Radius

Area (ha)	201
Population	192
Employment	3,368
Total Density (ppj/ha)	17.7

Station:	Bramalea GO	Corridor Type:	Priority Transit Corridor
Municipality:	City of Brampton	Combined Station:	n/a
Corridor:	Kitchener GO	Target Density:	150 ppj/ha

### ANALYTICAL LENS

- Limited Potential

### MOBILITY

- ZUM BRT service along Steeles Ave
- Planned RER service to Bramalea GO Station

### MARKET AND GROWTH POTENTIAL

- Low current development activity
- Limited vacant land, small parcel size

### LAND USE AND BUILT FORM

- Moderate flood risk
- GP Built Up Urban Area, Pearson Airport Operating Area, Provincially Significant Employment Zone
- Studies: Brampton Gateway Mobility Hubs and Intensification Corridor, Bramalea GO SP Study

### COMMUNITY CONSIDERATIONS

- Lack of community amenities
- Benefit from public realm improvements

\*Data source: Scenario 16, prepared by Hemson Consulting for the Region of Peel (2016 Census Data)



