

REPORT

Planning, Design & Development Committee

Standing Committee of the Council
of the Corporation of the City of Brampton

Date: June 27, 2005

File: P25 OF

Subject: **INFORMATION REPORT**

Brampton Official Plan Review, Office Strategy Discussion Paper

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OVERVIEW:

- This report presents the Brampton Official Plan Review Office Strategy Discussion Paper for the review of Planning, Design and Development Committee.
- The Discussion Paper is intended to invite input and comments from the public and stakeholders on the issues presented therein before proceeding to revise the Official Plan.
- The current office policies of the Official Plan are still largely relevant given significant lower historical office absorption rates for Brampton, the recent employment forecasts prepared by Hemson Consulting, and the fact that Brampton is part of a very competitive office marketplace.
- However, most of the Official Plan's office nodes have not been realized due to a very competitive office market.
- A re-evaluation of the current office strategy in the Official Plan to reflect more realistic business development opportunities is considered necessary. This will enable the Official Plan to designate areas for office use that are better matched to the locational requirements of Greater Toronto Area office users.
- Bram West will likely develop as the City's most successful greenfield area for offices and should be redesignated as a Primary Office Node.
- Using a policy driven approach, it is necessary to establish the significance of the Central Area Corridor as a major focus for office development.
- On the basis of the review, the following adjustments should be considered for public consultation:
 - Reconsider the number of designated office nodes in the Official Plan based on the Hemson Consulting employment forecasts;
 - Identify underperforming office node designations and consider alternative land use permissions;
 - Redesignate Bram West as a Primary Office Node; and,
 - Refine policies to establish the significance of the Central Area as a major focus for office development.

RECOMMENDATIONS:

1. **THAT** the Staff Report dated June 27, 2005 entitled “Information Report, Brampton Official Plan Review, Office Strategy Discussion Paper” and attachments (File P25 OF) be received;
2. **THAT** staff be authorized to release the “Brampton Official Plan Review Office Strategy Discussion Paper” for public consultation and that the City consult with relevant stakeholder groups through a workshop session to receive comments on the Discussion Paper before proceeding to revise the Official Plan;
3. **THAT** staff be directed to report back to Planning, Design and Development Committee with results of public consultation, and final recommendations on changes to the office strategy of the Brampton Official Plan; and,
4. **THAT** the City Clerk be directed to forward a copy of this report and Council resolution to the Region of Peel, York and Halton, the City of Toronto, and to the area municipalities of Mississauga, Caledon, and Vaughan for their information.

BACKGROUND:

The purpose of this staff report is to advise the Planning, Design and Development Committee of the results of the office strategy policy review (which forms part of the City’s ongoing Official Plan Review). The attached Discussion Paper prepared by City Staff proposes policy options that best respond to the potential for office development within Brampton, considering historic and current trends in the office space market in the Greater Toronto Area. The Discussion Paper is recommended for release for public consultation before staff proceed to revise the Official Plan.

Staff recognize that the current Official Plan was adopted by City Council in 1993 and approved by the Ministry of Municipal Affairs in 1997 and the office strategy policies do not sufficiently reflect current market trends. Given significant lower historical office absorption rates experienced by Brampton since the completion of the previous Official Plan review, the recent employment forecasts prepared by Hemson Consulting and the competitive office marketplace, staff are of the view that most of the Official Plan’s office nodes will have to continue to compete with office nodes in other municipalities that are better matched to the marketplace in order to attract major office development within the timeframe of the Official Plan.

CURRENT SITUATION:

Office Strategy Policy Review

The Office Strategy Policy Review comprises four main components:

- A review of the policies respecting office strategy in the Provincial, regional and local context;
- An overview of office space trends, office space inventory, existing office nodes, industrial and Central Area policies relating to office uses and the latest forecasts for office space;
- A review of the office strategy policies of other municipalities in the Greater Toronto Area including Toronto, Mississauga, Markham and Vaughan to identify “best practices”; and,
- Recommendations on possible directions with respect to amending the office strategy policies of Brampton’s Official Plan on the basis of the foregoing analysis.

Policy Context

The existing office strategy policies of Brampton’s Official Plan are intended to fit within the context of enabling Provincial legislation and policies, notably the *Planning Act* and the new *Provincial Policy Statement*.

The *Planning Act* is the principle piece of legislation governing the development of land in Ontario. Municipalities must have regard for the following areas of Provincial interest under the *Planning Act*:

- the orderly development of safe and healthy communities;
- the adequate provision of employment opportunities;
- the protection of the financial and economic well-being of the Province and its municipalities;
- the appropriate location of growth and development.

The Provincial Policy Statement sets the policy foundation for regulating the development and use of land, and the *Planning Act* requires that decisions affecting planning matters “shall be consistent with” policy statements issued under the Act. The policies that relate to economic development are set out in are Section 1.1 – Managing and Directing Land Use to Achieve Efficient Development and Land Use Patterns, and 1.3 – Employment Areas.

Specifically, the new Provincial Policy Statement states that healthy, liveable and safe communities are sustained by accommodating an appropriate range and mix of residential, employment (including industrial, commercial and institutional uses), recreational and open space uses to meet long-term needs.

As well, the document states that sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas, to accommodate an appropriate range and mix of employment opportunities, housing and other land uses to meet projected needs for a time horizon of up to 20 years.

The section on Employment Areas states that planning authorities shall promote economic development and competitiveness by providing for an appropriate mix and range of employment to meet long-term needs; providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses; and planning for, protecting and preserving employment areas for current and future uses. The new Provincial Policy Statement as well as the recently released Draft Growth Plan for the Greater Golden Horseshoe prepared under the *Places to Grow Act* (Bill 136) will further strengthen the role of the economy in municipal land use planning. *Places to Grow* recognizes that Ontario and the Greater Golden Horseshoe have been and will continue to be the economic engine of Canada.

Guiding principles applicable to office development are:

- Plan and manage growth to support a strong and competitive economy; and,
- Co-ordinate and integrate the economy, community and the environment through efficient infrastructure, and urban structure that links the region;

The *Planning Act* also requires that a local area Official Plan must conform to the policies of an upper-tier municipality's Official Plan. The elements of the Region of Peel's Strategic Plan and Official Plan have been largely addressed by the current Brampton Official Plan.

The office strategy policies of Brampton's Official Plan should also take direction from the City's Strategic Plan. In 1990, the City of Brampton became one of the first municipalities in Canada to create a comprehensive Strategic Plan, the foundation upon which all City plans and initiatives are based. The Strategic Plan entitled "Vision Brampton: Six Pillars Supporting Our Great City" identifies six pillars of strategic importance, based on extensive public consultation, in order to achieve the community vision.

The community vision for Brampton, as identified in Brampton's Strategic Plan 2003, is "to be a vibrant, safe and attractive city of opportunity where efficient services make it possible for families, individuals and the business community to grow, prosper and enjoy a high quality of life."

The City of Brampton has great potential, and the opportunity presented in the Strategic Plan is that growth will be effectively managed, shaped, and focused to suit the needs and wants of Brampton. As noted in "Vision Brampton: Six Pillars Supporting Our Great City", the City of Brampton prefers to be a city that pro-actively guides growth, rather than a city that reacts to growth.

The Official Plan review represents an opportunity to refocus the office strategy for the City of Brampton. The goals and objectives of the “Pillars” that are directly related to the office strategy mainly deal with managing growth and having a prosperous and dynamic economy.

The section on managing growth (Pillar 2) states that the City of Brampton must manage a program that co-ordinates and stages the level and distribution of development growth in Brampton in order to achieve a balanced land use pattern, reposition Brampton’s Central Area and preserve employment lands.

The section on a dynamic and prosperous economy (Pillar 4) states a goal of continuing to foster the emergence of Brampton, as one of Canada’s vigorous and prosperous local economies by attracting and retaining targeted employment growth in strategic locations including Downtown Brampton, supporting a competitive business infrastructure and celebrating Brampton as a City of outstanding quality.

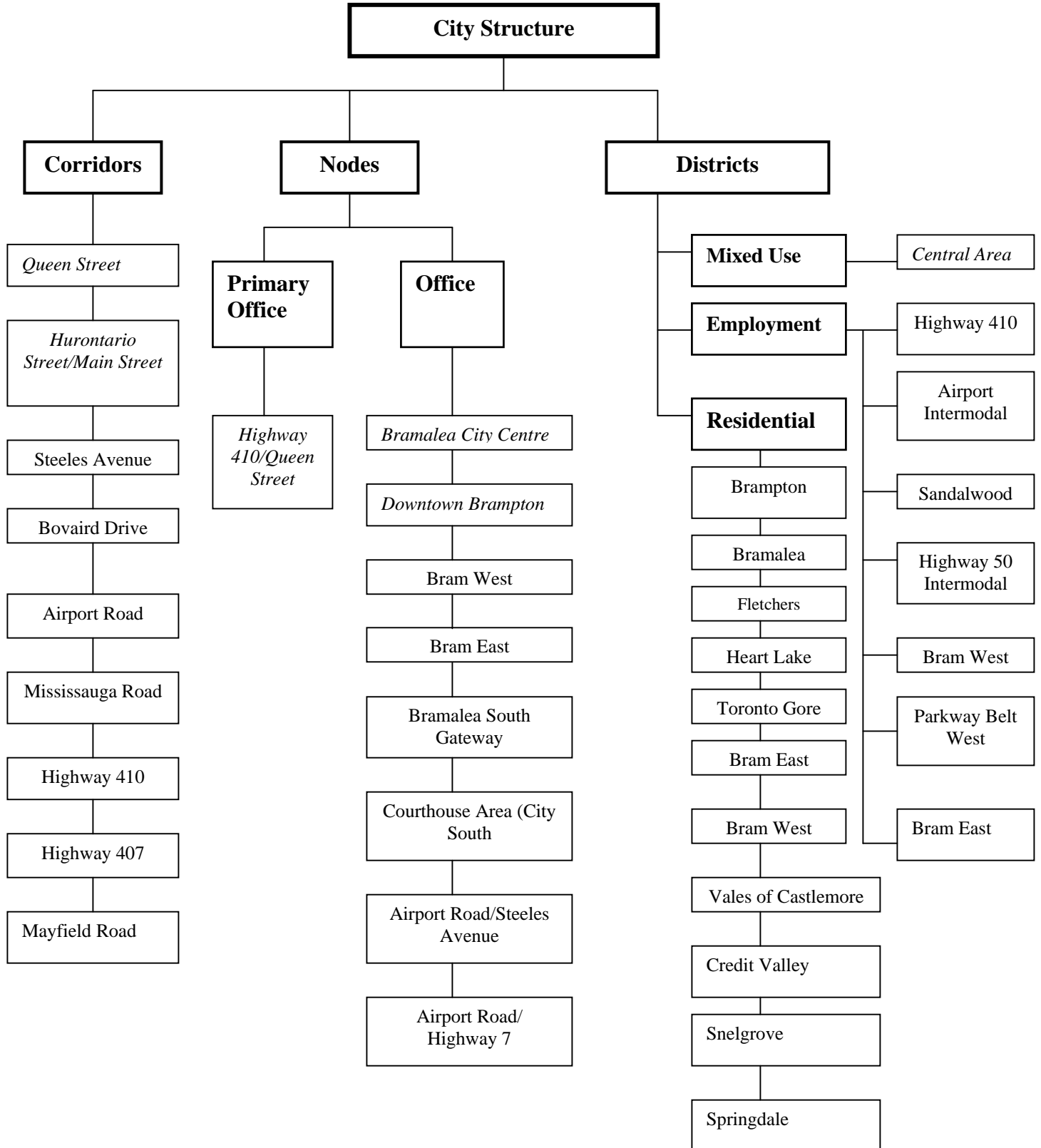
City Structure

The Economic Base Section of the Plan is intended to provide a general outline for commercial and industrial development in the City. The policies applicable to key areas of the City for commercial and industrial development are based on the city structure concept established in Section 3 of the Official Plan entitled City Concept. These policies are subject to all other policies of the Plan, as well as the detailed policies of the relevant Secondary Plans.

The fundamental nature of Brampton’s structure as an urban place is an inter-related pattern of activities and land uses concentrated in terms of variety, scale or specialization at a number of key nodes and areas. The City’s Official Plan describes the Central Area as the major location for commercial, cultural, civic and entertainment activity in the municipality. Based on the City concept established in Section 3 of the Official Plan, the City structure is provided in Figure 1.

The Central Area and other elements, such as corridors, nodes and districts, are illustrated on Map 1.

Figure 1 Brampton City Structure



Notes:

- Italicised text refers to the Central Area and includes the corridors and nodes that constitute the Central Area.
- The areas referred to within each District type are examples and not a complete list.

Relevant Market Forecasts

It is important that the Official Plan policies reflect current market trends. The 1997 Official Plan's office strategy was prepared on the basis of growth forecasts prepared by Stamm Economic Research as part of the Economic Base Study. However, based on Hemson Consulting's October 2004 forecasts, they are no longer representative of the current and projected market demand for office development in the City of Brampton.

Table 1 Comparison of Projections

Year	Employment Projections by Space Type (office) Stamm (May 1994)	Total Employment by Type (Major Office) Hemson (October 2004)
1991	43,141	5,900
1996	54,951	5,800
2001	69,287	7,600
2006	83,932	10,500
2011	99,219	18,700
2016	111,396	25,600
2021	120,870	32,200

Source: Economic Base Study, Table 3, (Stamm Economic Research), Population, Housing and Employment Forecast Update (Hemson Consulting Ltd.).

Hemson Consulting Ltd. provided a detailed year-by-year breakdown of employment growth for six geographic areas in Brampton. At the root of Hemson's forecast is an employment survey conducted by the Economic Development Office for the City of Brampton. The survey is conducted every two years to assess what the existing employment base is for the City of Brampton. Hemson Consulting incorporated the latest survey as a base for estimating employment growth to 2031.

Hemson also classified employment growth by three fundamental employment types: Major Office Employment, Population Related Employment (retail, commercial , institutional or anything directly related to population growth) and Employment Lands.

Table 1 shows the office projections by Stamm and by Hemson. When Stamm uses the term "office space", it is used to describe both a low density campus style building arrangement or a high density urban core building within three categories: central business district/core complex, campus/colony and business parks. When Hemson refers to "Major Office" it is defined as employment in free-standing office buildings of 20,000 sq. ft. or greater. The main difference between the forecasts are that Stamm is much more inclusive in its definition of "office space" and does not include a size limitation. This means that the office space forecasts prepared by Hemson are much lower.

Review of Other Municipal Official Plans

A benchmark comparison of Official Plan policies for the City of Brampton was done to examine other areas in the GTA, including the City of Mississauga, City of Toronto, Town of Markham and the City of Vaughan. This was completed in order to determine if other municipal Official Plans contained policies which are relevant to the City of Brampton. The benchmark exercise is summarized in Appendix A of the Discussion Paper.

The review has complemented the general policy analysis in confirming policy gaps that need to be addressed and possible directions to be considered in amending the office strategy of the Brampton Official Plan.

Recommended Directions for Policy Changes

On the basis of the review, some broad directions to improve and update the office strategy of the Brampton Official Plan are proposed as follows:

- provide policies that set urban design standards in the Official Plan for business industrial areas that contain office nodes which may develop as a business park district with corporate head offices and research and development uses;
- examine the office nodes that are under performing in the City of Brampton and which have limited potential for office development and consider alternative land use permissions;
- Update the Official Plan to reflect the recent employment forecasts by Hemson Consulting;
- Incorporate new policies based on staff's benchmarking review of other municipal Official Plans;
- Reconsider the number of designated office nodes in the Official Plan based on the Hemson Consulting employment forecasts;
- Redesignate Bram West as a Primary Office Node given the excellent locational attributes of the Mississauga Road corridor north of Highway 407; and,
- Refine policies to establish the significance of the Central Area as a major focus for office development.

Specific amendments to be pursued under these directions are summarized in the table attached as Appendix A to this report.

Internal Comments Received

Internal staff from Planning Policy & Growth Management and the Economic Development Department have participated in the review and preparation of the Office Strategy Discussion Paper and their comments are generally in support of it.

Proposed Consultation Process

Upon authorization of the Planning Design & Development Committee, the Discussion Paper will be released for circulation to the public and relevant stakeholder groups, including the Brampton Board of Trade, Brampton Downtown Business Association, major real estate brokers and office developers. Various opportunities will be provided to promote public participation including individual meetings/discussions with City staff and the scheduling of a workshop to receive comments and input from the public and stakeholders on the Discussion Paper.

Staff will report back to the Planning, Design and Development Committee with results of the consultation and final recommendations on changes to be made to the office strategy of the Official Plan.

CONCLUSIONS

The current office policies of the Official Plan are still largely relevant given significant lower historical office absorption rates for Brampton, the recent employment forecasts prepared by Hemson Consulting, and the fact that Brampton is part of a very competitive office marketplace. However, most of the Official Plan's office nodes have not been realized due to a very competitive office market and more attractive locations in other parts of the GTA.

A re-evaluation of the current office strategy in the Official Plan to reflect more realistic business development opportunities is considered necessary. This will enable the Official Plan to designate areas for office use that are better matched to the locational requirements of Greater Toronto Area office users.

Staff are proposing that the Bram West Office Node be redesignated as a Primary Office Node and policies be put in place to refine the significance of the Central Area as a major focus for office development.

Staff are also recommending that the office policies provide more direction within the Official Plan for business industrial areas that contain office nodes that may develop as a business park corporate head offices, research and development uses. In this respect, policies need to be added to the Official Plan that provide clearer guidelines regarding the range of relevant uses and associated urban design criteria.

Respectfully submitted,

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Central Area Planner

David Waters, MCIP, RPP, PLE
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AGREED,

John B. Corbett, MCIP, RPP
Commissioner, Planning, Design &
Development Department

Dennis Cutajar,
Commissioner, Economic Development &
Public Relations

Attachments:

- Appendix A: Summary Table of Proposed Changes to Office Strategy of the Brampton
Official Plan
- Appendix B: Brampton Official Plan Review Office Strategy Discussion Paper

Appendix A
Summary Table of Proposed Changes to
Office Strategy of the Brampton Official Plan

Appendix B
City of Brampton Official Plan Review
Office Strategy Discussion Paper

Summary of Proposed Changes to Office Strategy of the Brampton Official Plan

Section	Current Policy	Proposed Changes for Discussion Purposes
<p>4.2.1 Role and Function of Key Areas</p>	<p>Central Area</p> <p>4.2.1.1 The Central Area designation identifies an area which shall collectively serve as the location for:</p> <ul style="list-style-type: none"> • a full range and concentration of commercial uses, including office, retail, and service activities; • the major location for entertainment and cultural uses. In this regard, the Central shall serve as the major location for movie theatres, museums, art galleries and live theatre; • governmental, institutional and community facilities and uses; and • compatible residential uses, both free-standing and in mixed use forms. 	<p>Add wording referring to the “Central Area Transit Corridor ” as a higher order transit area that represents one of the city’s prime locations for office development.</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
<p>4.2.1 Role and Function of Key Areas</p>	<p>Bram East</p> <p>4.2.1.2</p> <p>The Bram East Secondary Plan area has significant locational and infrastructure attributes, including proximity to Highways 7, 50 and 427, Lester B. Pearson International Airport, and environmental and outdoor recreation lands, such as the Claireville and Ebenezer conservation lands, and several nearby golf courses. These attributes provide the basis to attract the following uses:</p> <ul style="list-style-type: none"> • Prestige industrial uses along the Highway 7/Ebenezer Road corridor; • Personal and business service uses along the Highway 7 and Highway 50 corridors; • Regional and local scale retail and service uses; and, • Office development at the Highway 7 and Highway 50 node, and along Highway 7; 	<p>Delete this node but add policies to establish minimum office space requirements and specific urban design policies to maintain the planned “gateway”, and add policies to protect this area from shorter term lower order and incompatible uses.</p>
	<p>Bram West</p> <p>4.2.1.3</p> <p>The Bram West Secondary Plan area, with access and visibility to Highway 407, has the potential and infrastructure attributes to attract the following uses:</p> <ul style="list-style-type: none"> • Prestige and general industrial uses; • Office and research uses; and, • Regional and local scale retail and service uses along Mississauga Road and Steeles Avenue. 	<p>Redesignate this area as a Primary Office Node.</p> <p>Implement policies to prevent the intrusion of residential uses or other non-complimentary lower order employment uses, and provide more direction within the Official Plan for business industrial areas that contain office nodes that may develop as a business park district developing with corporate head offices, research and development uses. In this respect, policies need to be added to the Official Plan that provide clearer guidelines regarding the range of relevant uses and associated urban design criteria.</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.3 Office Dominant Sector	<p>The office dominant hierarchy includes Primary Office Node and Office Node designations as indicated on Schedule "A" of this Plan. These designations identify areas that have the unique attributes required to attract higher order office development and that should be protected for that purpose. Although other smaller scale offices will locate in retail centres, Business Industrial designations, or Industrial designations, such uses are inherently more flexible and do not require the same critical mass of office space to maintain their attractiveness for such uses.</p>	<p>Reword to remove reference to a hierarchy that includes a Primary Office Node and Office Node designations. Add wording to state that the Mississauga and Steeles area of Bram West is designated as a Primary Office Node and the Central Area will be a "Central Area Transit Corridor".</p>
	<p>4.2.3.1 The City shall interpret the Primary Office Node and Office Node land use designations as identified on Schedule "A" to provide for the development of major office uses at appropriate locations along with business uses, accessory and personal service, retail, hotels and business support services.</p>	<p>Remove reference to the Office Nodes.</p>
	<p>4.2.3.3 The City shall require proposals to expand or add to the Primary Office Node or Office Node designations to be subject to an Official Plan Amendment.</p>	<p>Remove reference to the Office Node, add "Central Area Transit Corridor."</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.4 Primary Office Node	<p>Policies</p> <p>4.2.4.1 The Primary Office Node designation is located within the Central Area, bounded by Queen Street, Highway Number 410, the CNR rail corridor and the rear property line of the properties fronting the west side of Rutherford Road. This area shall be developed and reinforced as the major office activity area for the City of Brampton and will contain the highest density and greatest concentration of office development. The uses permitted in the Primary Office Node designation shall include offices, services, retailing, entertainment, hotels, business support activities, community services, and all uses consistent with the Central Area designation.</p>	<p>Reword this section to refer to Bram West node as the “Primary Office Node”.</p>
	<p>4.2.4.2 The City shall encourage major offices, hotels, convention centres, government buildings, entertainment uses and cultural facilities which have a City-wide or larger service area to locate within the Primary Office Node designation.</p>	<p>Remove reference to the Primary Office Node, reword to state that “The City shall encourage major offices, hotels, convention centres, government buildings, entertainment uses and cultural facilities which have a City-wide or larger service area to locate within the Central Area Transit Corridor”, and put this under Section 4.2.2 Central Area.</p>
	<p>4.2.4.3 The development of the Queen Street/ Highway 410 Primary Office Node as a major office area is predicated on the provision of enhanced access from the abutting Highway Number 410 and the provision of higher order transit services including a new GO Train Commuter Station and a transit terminal to be operated as part of a planned North-South Transit Corridor along Highway 410 in accordance with the Transportation section of this Plan.</p>	<p>Remove this section.</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.4 Primary Office Node	<p>4.2.4.4</p> <p>The ultimate development form of the Queen Street/ Highway 410 Primary Office Node area including the type, location, and interrelationship of land uses, including multiple density residential uses, shall be determined as part of a Secondary Plan study for the area.</p>	<p>Remove “Queen Street/Highway 410 Primary Office Node” and replace with “Central Area Transit Corridor”. Ultimate development will be determined as part of the Central Area Plan Review process and shall form part of the Secondary Plan.</p>
	<p>4.2.4.5</p> <p>The Primary Office Node designation on Schedule “A” of this Plan is intended to recognize the long term potential of this area for redevelopment for a full range of higher order uses. Notwithstanding this designation, existing industrial uses both within and adjacent to the Primary Office Node designation will continue to be permitted by this Plan and the relevant Secondary Plan, and the potential impact of such development and redevelopment on the viability of existing industrial uses will be considered as part of the comprehensive land use and transportation studies that are required to provide for the transition of this area to an appropriate mix of higher order uses, in particular, the impact of the type and volume of vehicular traffic on the use, activities and operation of nearby industrial uses.</p>	<p>Remove reference to the Primary Office Node, refer to the area as the “Central Area Transit Corridor”.</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.5 Office Node	<p>4.2.5.3 The Office Node designations identified on Schedule "A" of this Plan are:</p> <ul style="list-style-type: none"> (i) Downtown Brampton; (ii) Bramalea Centre; (iii) Courthouse Area; (iv) Airport Road/Highway 7; (v) Steeles Avenue/Airport Road; (vi) Bramalea South Gateway; (vii) Bram East; and, (viii) Bram West. 	Remove this section.
	<p>4.2.5.4 The Downtown Brampton Office Node area is located in the general vicinity of the intersection of Queen and Main Streets. This area will be developed to permit significant office development that is compatible with the local historic character of the area.</p>	Revise to re-designate the node as part of the “Central Area Transit Corridor”, and also add policies to protect this area from shorter term lower order or incompatible uses.
	<p>4.2.5.5 The Bramalea Centre Office Node is generally bounded by Highway Number 7, Dixie Road, Clark Boulevard and Central Park Drive. This area will be developed as a focus of higher density development which is based on the provision of higher order transit services to accommodate future population and employment growth.</p>	Re-designate the node as part of the “Central Area Transit Corridor”, and also add policies to protect this area from shorter term lower order or incompatible uses. The Bramalea City Centre will be identified as a Regional Center in the Official Plan.

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.5 Office Node	<p>4.2.5.6</p> <p>The Courthouse Area Office Node is located in the general vicinity of Highway Number 10 between Steeles Avenue and Highway 407, focused on the County Court Boulevard and Highway Number 10 intersections. This area will be developed as an office node incorporating retail, a significant amount of institutional space, and residential uses, where appropriate.</p>	<p>Remove this node since there are no vacant sites available for new office development and potential office growth would therefore be limited to infill and small redevelopment/retrofit of existing buildings.</p>
	<p>4.2.5.7</p> <p>The Airport Road/Highway 7 Office Node area is located at the intersection of Highway Number 7 and Airport Road. This area will be developed as a small scale office employment area that also contains complementary business support services, generally serving the surrounding industrial designations.</p>	<p>Remove this node, add policies to allow additional employment uses which would still be compatible with the surrounding area.</p>
	<p>4.2.5.8</p> <p>The Steeles Avenue/Airport Road Office Node area is focussed on the area north of the planned Highway Number 407 alignment at Airport Road. This area will be developed as a specialized industrial/commercial employment node containing a moderate amount of office space and related retail and service uses generally serving the surrounding industrial designations.</p>	<p>Remove this node, add policies to allow additional employment uses which would still be compatible with the surrounding area.</p>

Section	Current Policy	Proposed Changes for Discussion Purposes
4.2.5 Office Node	<p>4.2.5.9 The Bramalea South Gateway Office Node area is located at the intersection of Bramalea Road and Steeles Avenue East. This area is recognized as an urban gateway to the City of Brampton. The development of this area as a mixed use Office Node is based on the planned expansion of the Bramalea GO Station to include all day, two way train service; the construction of Highway Number 407 and its interchange at Bramalea Road and the functional integration of public transit facilities as detailed in the Transportation section of this Plan.</p>	<p>Remove this node, permitted uses in this node should be reviewed to allow additional employment uses which would still be compatible with the surrounding area.</p>
	<p>4.2.5.10 The Bram East Office Node area is located along Highway Number 7, west of Highway Number 50, and shall form the gateway to the City of Brampton from the east. The designation will permit both office uses and complementary retail and service uses.</p>	<p>Remove this node, establish minimum office space requirements and specific urban design policies to maintain the planned “gateway” function.</p>
	<p>4.2.5.11 The Bram West Office Node area is located in the area of Steeles Avenue/Highway Number 407 and Mississauga Road, and shall form the gateway to the City of Brampton from the southwest. The designation will permit both office uses and complementary retail and service uses.</p>	<p>Establish this area as a “Primary Office Node”.</p>