

July 3, 2024

Chair and Members of Planning Committee  
City of Brampton  
2 Wellington Street West  
Brampton, ON  
L6Y 4R2

Via email: [cityclerksoffice@brampton.ca](mailto:cityclerksoffice@brampton.ca)

Dear Chair and Members of Planning Committee;

**RE: Major Transit Station Area Plans for Dixie and Central Park  
OUR FILE 9519Y-1**

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MacNaughton Hermesen Britton Clarkson Planning Limited ("**MHBC**") is retained by Morguard Corporation ("**Morguard**") with respect to the Bramalea City Centre ("**BCC**") located at 25 Peel Centre Drive (outlined on the location map below). BCC is a successful regional shopping centre containing approximately 1.5M square feet of retail and office space on 33 hectares of land. It is a major activity centre, drawing people from around the city and region to shop, work and play. Over the years, the ownership has made substantial investments into the property to maintain the regionally significant class A shopping centre status that it enjoys today.



Bramalea City Centre

Further to our correspondence dated June 10, 2024, we would like to thank staff and Council for the opportunity to review the preliminary MTSA plans and provide feedback on the May open houses. Over the past several years, the City has made consistent and commendable progress on implementing its vision for intensification and MTSA.

As the MTSA project approaches the more detailed stage of plan-making and policy development, we are providing the following detailed comments on the plans released by the City to date. The potential of BCC to accommodate a significant amount of transit-oriented, mixed-use intensification over the long term cannot be overstated given its 33 hectare size and its location abutting two future BRT stops and the existing Bramalea Transit Terminal. The BCC site is a significant asset to the City's goal of accommodating growth through intensification and reducing reliance on greenfield development. Therefore, the need to get this stage of the MTSA project done right is of utmost importance to ensure that the long-term redevelopment and intensification of this site is not compromised. We would like to work with staff to ensure that appropriate policies and regulations are applied to the site and offer the following comments based on what has been released to date:

1. **Maximum Building Heights and Densities** – We understand that the City is cautiously approaching the implementation of heights and densities within MTSA. However, given the potential redevelopment opportunity at BCC, we feel that the proposed heights and densities are too low and do not optimize the potential of the site to accommodate transit-oriented intensification. The site is unique in being a 33-hectare, contiguous land holding in the heart of City and along one of the most significant pieces of planned transit infrastructure. In addition, the location has many existing development inducing benefits including one of the City's largest existing transit terminals, an abundance of parks and schools in the immediate vicinity, and other major community infrastructure like the Bramalea Civic Centre and Chinguacousy Park.

Attachment 1 to this letter outlines revised heights and densities that are more appropriate for the site and optimize its intensification potential. These revised heights and densities take into account the Queen Street corridor with its planned BRT stations at Dixie Road and Central Park Drive as the focal point of intensification with intensity decreasing southward towards existing lower density areas. It also considers the fact that BCC can become a true Urban Centre as identified in the new Brampton Official Plan with its proposed new road networks and park space. This is in contrast to other areas of the MTSA. For example, the area on the west side of Dixie Road, along Lisa Street, is predominantly built out, does not contain any mixed uses and is served by a single road yet the current City drafts show this area as having taller height permissions than most of the BCC site. Furthermore, other areas of the plan (the corner of Queen Street and Central Park Drive) are identified as "No Maximum Height" yet are almost fully built out and across the street from detached homes.

We also note that the portion of the Dixie Tributary running through the western portion of BCC has not been reflected on the plans. This is a piece of existing (and soon to be upgraded) stormwater infrastructure that renders some of the land as non-developable and therefore cannot be considered as part of the total intensification potential of the site.

## 2. Mapping Clarifications

- a. There is a portion of land identified as “Prestige Employment”, immediately west of the Bramalea Transit Terminal, where Morguard currently operates a small parkette. We understand that this may be a typo but are seeking clarification as to the nature of this redesignation and note that employment uses may introduce land use conflicts for future residential intensification.
- b. The height and density mapping does not identify the proposed permissions for lands on the north-east corner of the Queen Street East and Dixie Road intersection. What is intended for this corner?
- c. The MTSA Land Use Plan shows a dotted line extending from the Queen Street East and Dixie Road intersection into the BCC site. This arrow is not defined in the legend.
- d. The Dixie Tributary is not reflected on the mapping and should be identified to ensure it is not counted as developable area.

**3. Size and Location of Park** – In the response to our comment letter found in Appendix D of the staff report, staff note that the size and location of the Proposed Park is not fixed and will be determined through future development applications. This is a prudent approach but requires the current location of the Proposed Park be assigned height and density permissions should the Proposed Park be located elsewhere. We have provided proposed heights and densities for that location in Attachment 1 to this letter. As per our original comment letter, locating the park further south would allow greater density to be concentrated closer to transit infrastructure where parks and open space could be provided in a more urban format through methods like privately owned publicly accessible spaces (“POPS”) as opposed to a suburban-style park.

**4. Existing Development Application** - The Precinct Plan Aerial View shows a label that states “25 Peel Centre Drive Application 33, 30, 26 and 12 Storeys Rezoning Approved”. Additionally, staff reference rezoning in their response to our initial comment letter (Appendix D of the staff report) indicating that recent rezonings are not being considered for pre-zoning as part of Phase 3 of the MTSA project. We would like to clarify that this area of BCC has never been the subject of a site-specific rezoning. It carries the same zoning as the rest of the BCC shopping centre, though Morguard is currently in the process of finalizing a site plan application to facilitate residential intensification in that area. Furthermore, our initial letter provided comments on the entire BCC site and was not restricted to the area which is being reviewed through the site plan process.

**5. Density Transfer Policy** – In preparing text policies for the upcoming Secondary Plan amendments, we recommend that staff consider including policies that allow transfers of height and density permissions on contiguous sites which would allow such sites to address context specific issues without compromising the overall intensification potential of the MTSA.

**6. Transition Policies** – Over the course of the MTSA project and the preparation of the City’s new official plan, MHBC has submitted numerous comment letters stressing the importance of having appropriate transition policies for BCC. The site has tremendous intensification and redevelopment potential which will be realized thoughtfully and gradually, over the long term. However, during this time, the existing commercial function of the shopping centre needs to

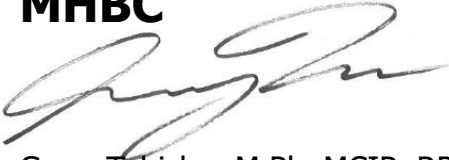
be recognized and protected. BCC has served and continues to serve an important commercial, employment and recreation function for the broader Brampton area and therefore must have flexible policies to ensure that the mall can continue to evolve over time and respond to changes in the local market; this includes things such as, but not limited to, being able to operate and modify the surface parking lots, construct new commercial buildings and make various other modifications to the site. The existing transition policy in the Queen Street Corridor Secondary Plan should therefore be preserved and enhanced where necessary to ensure that the shopping centre can continue to operate and evolve.

7. **Mixed Uses** – We concur with the language used in the character area descriptions which “encourages” a mix of uses and commercial uses at grade as opposed to requires them. This is an important acknowledgement of the significant existing supply of commercial uses in the area which is the context within which most of this area will develop.

We appreciate the opportunity to provide comments on the City’s MTSA plans and would be pleased to work with staff on a context-appropriate policy and zoning framework for the BCC lands.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'Gerry Tchisler', written over a light grey circular stamp.

Gerry Tchisler, M.Pl., MCIP, RPP  
Partner

cc: MTSA Project Team [mtsa@brampton.ca](mailto:mtsa@brampton.ca)



Proposed Max. Heights (Dixie & Central Park MTSA)



PROPOSED DENSITY DISTRIBUTION

Draft for Discussion Purposes

3 Km of rapid transit served corridor covering 40 million sq.ft of opportunities for creating urban, sustainable and wakable neighbourhoods, including approximately 36,000 Residential Units and 100,000 new residents

