

July 5, 2024

GSAI File: 446-006

To: City Clerk's Office, Legislative Services Department
The Corporation of the City of Brampton
2 Wellington Street West
Brampton, ON L6Y 4R2

**Re: Community Open House – Primary Major Transit Station Areas
Bram South Precinct – Laurelcrest PMTSA
CPVC 100 WEST NOMINEE INC. (Crestpoint Real Estate Investments Ltd.)
100 West Drive (Laurelcrest MTSA), City of Brampton**

Glen Schnarr & Associates Inc. ("GSAI") are the planning consultants to Crestpoint Real Estate Investments Ltd., owners of 100 West Drive (herein referred to as the "Subject Property"). The Subject Property is located on the west side of West Drive, north of Clark Boulevard and is currently being used for industrial purposes. The Subject Property is within the Laurelcrest Major Transit Station Areas ("MTSA"), a "Primary" MTSA, which was delineated by the Region of Peel in their updated Official Plan (approved with modifications on November 4, 2022).

GSAI has been following the MTSA review and has been engaged in many discussions with City staff on the matter. GSAI made a submission in July of 2023 on the MTSA land use plans put forward at the July 31, 2023, Planning and Development Committee (Planning, Bldg & Growth Mgt-2023-315). Most recently, GSAI attended the Community Open House on May 14, 2024, which presented preliminary land use concepts, heights and densities as well as park and road network connections, amongst other details.

GSAI is pleased to see the City's efforts to advance MTSA's. This is a positive step forward in strategic planning for the evolving City of Brampton. We recognize that at this time, the information provided at the Open House is in a preliminary stage and subject to change. We thank staff for the opportunity to provide comment on the MTSA work. We have provided our comments on the current MTSA work and with respect to Land Uses, Building Heights and Density, Park Blocks and Road Network, as described below.

Land Uses (Proposed)

As an interim policy solution, while the existing industrial uses continue to exist and operate, we recommend including policies in the draft MTSA policy framework to explicitly permit continued/expanded industrial uses on the entirety of the Subject Property, while still protecting for future mixed use/residential redevelopment in the future.

As presented on the materials at the Community Open House on May 14, 2024, the City has identified the Subject Property as either High Rise Mixed Use, Mid Rise Mixed Use or Prestige Employment/Industrial.

For the future land use scenario, we recommend to staff that our Client's lands be considered in their entirety for High Rise Mixed Use. This presents a logical land use pattern by concentrating greater densities and heights in the westerly portion of the MTSA where there is interface with uses that would not be negatively affected by greater heights/densities (such as Highway 410 and existing Industrial uses). The Clark Avenue right-of-way is a distinct and logical boundary dividing industrial/employment uses on the south side of Clark Avenue and future residential uses on the north side of Clark Avenue. This effectively puts to better use what could be considered otherwise underutilized lands within the MTSA under the City's current vision for the lands. We remind staff that mixed use development offers jobs and employment opportunities (such as, but not limited to, retail, commercial and office elements, typically located in podium elements).

The area/lands bound by Queen Street to the north, West Drive to the east, Clark Avenue to the south and Highway 410 to the west (which include our Client's lands) have the opportunity to develop into an urbanized area without limitation of established neighbourhoods or environmental/natural feature constraints. We see these existing limitations in other areas within this MTSA. These existing conditions directly impact the opportunity to have higher density mixed uses located within the limits of the MTSA. We encourage staff to more carefully consider the opportunity that this specific area of the Laurelcresc MTSA presents when evaluated against the vision and planned intent at the Provincial, Regional and local level for MTSA's, and given the Subject Property's proximity to the future Queen Street BRT.

In conclusion, it seems contrary to policy directives to limit development potential for high-density mixed-use sites where it can be supported. It is our opinion that there is a missed opportunity by maintaining our Client's lands as either Prestige Employment/Industrial and Mid-rise Mixed Use. By pursuing a high density mixed use designations on our clients lands, the vision for PMTSA's as areas where compact, mixed-use, transit-supportive development is to be directed is most effectively realized. To limit the development potential on these lands would have significant implications on the achievement of a number of Provincial objectives such as directing growth to certain areas and the provision of housing in those areas.

Building Heights and Density (Proposed)

While we acknowledge that the City has the authority to implement height and density caps in MTSA's, it is our opinion that these caps will not optimize intensification opportunities and accommodate for specific, higher density and compact built forms within areas targeted for growth. The implementation of maximum heights in MTSA's typically do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed.

We note for staff, Policy 5.4.18.6 of the Region's Official Plan which provides that the Region's objective is:

"[t]o optimize all intensification opportunities across the Region and maximize development within Strategic Growth Areas."

Maximum heights often will become a barrier to accommodating development in appropriate locations, such as those in close proximity to higher order transit where higher density, transit-supportive development ought to be, and will be a barrier to supporting greater housing choice and the delivery of new housing units, challenging the implementation of Provincial policy objectives.

That said, we acknowledge the City's strategy of focusing height along Queen Street and prescribing unlimited heights on certain sites with frontage along Queen Street. Nonetheless, height and density caps

throughout the balance of the MTSA will inherently limit the redevelopment potential of lands where transit-oriented, higher density, mixed-use development ought to occur.

In this respect, we are requesting that our Client's lands, in their entirety, be afforded greater as-of-right heights and densities (in addition to the amended High Density Mixed Use land use designation discussed above). We believe that there is logic in permitting for heights beyond 40 storeys and extending those height permissions south along the Highway 410, all the way to the northerly limit of Clark Boulevard. This would include revised permission for heights on sites located along West Drive, as well. We anticipate that there will be urban design policies related to the provisions of podiums, step backs, etc., to help guide the appropriate massing and scale of development within the MTSA. We feel it is contrary to the planned function of MTSA's to limit heights and densities as they are currently contemplated.

Notwithstanding the above, we do anticipate seeing new policies to address the rights of landowners and/or applicants to apply for exceedances of the prescribed height and densities within MTSA's through privately initiated Official Plan amendments. We remind staff that through the Planning process, reviewers are afforded the opportunity to assess the appropriateness of heights (and by extension, density) on a case-by-case, site specific basis through the review of technical reports and plans such as sun/shadow studies and angular plane analysis' when development concept plans are prepared.

We are of the opinion that the area/lands bound by Queen Street to the north, West Drive to the east, Clark Avenue to the south and Highway 410 are unique as they have the opportunity to provide for a transit-supportive development in an urban setting as there are no environmental or natural area constraints, nor are there existing, established neighbourhoods, such as those found on the north side of Queen Street. These existing conditions directly impact the performance and planned function of the MTSA. These lands could compensate for the lost density on the north of Queen Street which are not planned for redevelopment nor significantly contribute to the function of a MTSA.

In this respect, we would request that the City reassess the prescribed heights and densities proposed on our Client's lands, within the MTSA at this time. The City should also consider including a policy that enables a proponent to provide rationale/justification for greater heights and densities, to the satisfaction of staff, on a site-by-site basis through the Planning application process, without triggering the need for a site specific Official Plan Amendment.

Park Blocks (Proposed)

We note the "proposed park" shown on our clients' lands on the latest iteration of the land use concept. We are looking for confirmation that at this time, the park location and size are largely conceptual and that the final location and size will be confirmed through future development application(s).

We note for staff that with this area evolving into a more urban area, while we recognize the benefit and need for parkland, the ~3 acres being requested could be better suited to be broken up into two separate park blocks of a smaller size, with the second site being located elsewhere in the MTSA.

We also are requesting clarification on the City's process to determine parkland size and location in this instance.

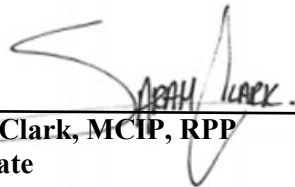
Road Network (Proposed)

We acknowledge that the City has located potential road networks. While we recognize there is more work to be done with respect to determining the location and size of the future roads and rights-of-way (“ROW”), we are of the opinion that consideration should be given to more urban ROW widths and characteristics. This would include less focus on accommodating private automobile travel and effectively narrowing ROW widths to take a ‘pedestrian first’ approach to spatial planning. Prioritizing urban elements such as reduced ROW’s and smaller setbacks to the streets, will create a richer and more desirable public realm at the human scale.

We commend staff for their work on the MTSA process and as always, appreciate the opportunity to provide comments. At the convenience of staff, we would be happy to meet to discuss our requests and comments provided herein.

Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Sarah Clark, MCIP, RPP
Associate

cc. **Michelle Gervais, MCIP, RPP, Policy Planner, City Planning & Design**
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