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August 25, 2023

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City of Brampton
2 Wellington Street West
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Via email: mtsa@brampton.ca

Dear Ms. Gervais

**RE: COMMENT LETTER - MAJOR TRANSIT STATION AREA DRAFT POLICIES
25 PEEL CENTRE DRIVE
OUR FILE 9519Y**

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

The purpose of this letter is to provide our review and comments regarding the proposed land use and minimum density policies pertaining to Brampton's "Primary" MTSAs, as released on August 18, 2023. The policies released are high-level to guide overall development in the Primary MTSAs.

It is understood that comprehensive land use planning policies are intended to be brought forward in Q2 2024 through Precinct Plans or OPAs to the applicable Secondary Plans. The comprehensive plans will include policies pertaining to urban design, built form, transportation, active transportation, community services, parks and open space, infrastructure, phasing and implementation. As such, please take these as our preliminary comments. Once additional information and draft text policy is available, we will be able to better assess the proposed policies and area plans, and provide more comprehensive comments.

Mixed-Use Areas

The draft policies for Mixed-Use Areas require commercial and retail uses to be provided at grade to activate the frontage along all Primary Urban Boulevards, Secondary Urban Boulevards and Corridors. BCC has frontage along Queen Street and Dixie Road, which are identified as Primary and Secondary Urban Boulevards respectively.

We recommend the policy language include flexibility in locations where it is deemed not appropriate to provide ground floor retail along a Primary Urban Boulevard, Secondary Urban Boulevard, or Corridor. In a location such as BCC, where the Primary Urban Boulevard and Secondary Urban Boulevard are both 6 lanes with heavy vehicular traffic, it would be difficult to provide ground floor retail units and expect high foot traffic.

As noted, BCC is a 33 ha contiguous property with numerous internal streets, presenting an opportunity for ground floor retail to be provided internal to the site where the streets are walkable. BCC has a number of existing single use out-parcel buildings along Queen Street and Dixie Road in addition to the uses in the mall. These uses serve as important commercial function and are expected to operate for the foreseeable future. Providing additional ground floor retail along the Queen Street and Dixie Road frontages may impact the long term viability of existing stores that are set to remain for the foreseeable future.

A policy should be added to recognize that changes to the location of ground floor retail should not require an amendment to the plan, provided that the ground retail requirement can be sufficiently provided elsewhere on the site and that the general intent and purpose of the plan is maintained.

Transition and Phasing

It is important to recognize that BCC currently operates as a regional shopping centre with over 1.5 million square feet of commercial and office space. Morguard intends to operate BCC as a Class A shopping centre for the foreseeable future. As noted in our submissions on the draft new Official Plan and on the interim MTSA policies for the in-effect Official Plan, transition policies are of critical importance to BCC.

We appreciate that the draft policies recognize that the redevelopment of MTSA areas are to occur gradually over the long-term. The redevelopment of BCC will endure over the long term into the high density mixed use centre envisioned by the MTSA land use plans and Vision 2040.

The future policy framework, via Precinct Plans or OPAs to the applicable Secondary Plans, will need to consider that elements of the BCC site, such as surface parking, single use buildings, and one or two storey buildings, will need to be permitted over the long term to ensure that mall operations are not interrupted and tenant leasehold interests are protected. We understand these policies may get detailed at the secondary plan stage, and we will provide additional comments that specifically relate to the BCC site at this stage.

Landscape Buffer

Landscape buffer is defined as "a continuous area of land having a minimum depth of 15 metres provided between a lot line and the wall of a building." The buffers shall function as a transitional space that physically separates and visually screens adjacent land uses.

The provision of a 15 metre landscape buffer is significant; the rationale regarding how this value was determined is requested. We believe a reduction in this requirement should be contemplated, as a reduced buffer would still provide adequate physical separation and visual screening from adjacent land uses. In addition, clarification regarding the location of the landscape buffers is requested.

Dixie Road Station Draft Land Use Plan

The Dixie Road Station Draft Land Use Plan proposes a neighbourhood park on the north-east corner of Dixie Road and Clark Boulevard. It should be clarified on the land use plan because this area is an existing drainage channel.

Conclusion

It is understood that a statutory public meeting will be held on August 28, 2023, to present the proposed land use and minimum density policies; representatives from our office will be in attendance.

On behalf of our client, we appreciate the opportunity to provide comments to the City of Brampton and hope that our recommendation is taken into consideration. We will continue to monitor the OPA and MTSA Study processes and may provide further comments. If there is anything further you may require in relation to this letter, please do not hesitate to contact us.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read 'Gerry Tchisler', written over a light blue horizontal line.

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