

August 28th, 2023

Project: CB2.BR

MTSA@brampton.ca

City of Brampton
2 Wellington Street West
Brampton, ON
L6Y 4R2

Re: Major Transit Station Study Area Study – Preliminary Land Use Plans - Bramalea GO

We represent Mac Mor of Canada Ltd., the owner of 75 Bramalea Road (the “subject site”), located within the Bramalea GO Station Primary MTSA. We have reviewed the staff report for the August 28th Statutory Public Meeting on Major Transit Station Areas (MTSA), Draft Brampton Plan Policies and offer the following comments and recommendations.

On behalf of the owner, we actively participated in the Region’s Municipal Comprehensive Review process, the City’s ongoing Official Plan Review, and the Major Transit Station Areas Study process. The Bramalea GO Preliminary Land Use Plan dated August 2023, designates the subject site as “Mixed-Use (High-Rise Mixed Use)”, as shown on **Figure 1** (Red Star identifies the subject site). The Land Use Plan also identifies a “Mid-Block Connection” across the subject site connecting East Drive to Dearbourne Boulevard and a “Proposed Landscape Buffer”.

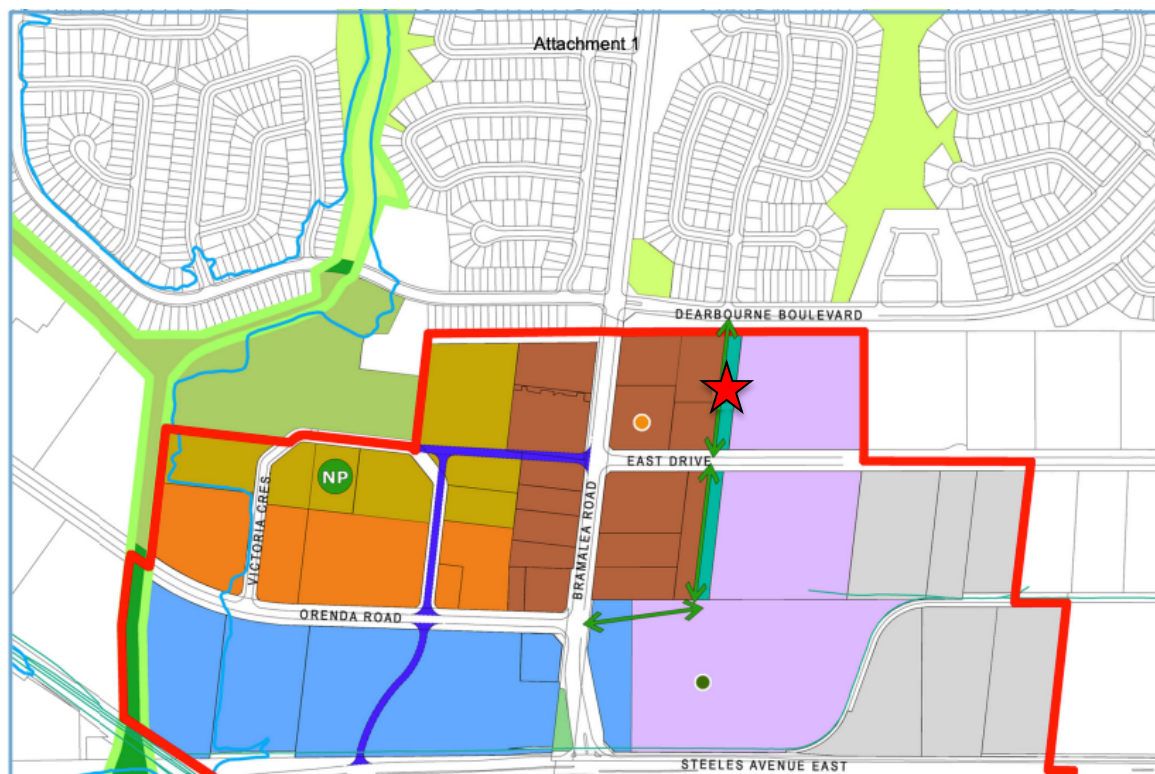




Figure 1: Bramalea GO Preliminary Land Use Plan Extract - dated August 2023

As noted in our letter, dated May 17th, 2023, we support the “Mixed-Use (High-Rise Mixed-Use)” land use designation along Bramalea Road, and are pleased to see the rear of the property is also designated “Mixed-Use (High-Rise Mixed-Use)”. This will facilitate the realization of a diverse housing mix within the MTSA.

However, we do not support the inclusion of landscape buffers on the land use plan and the “Landscape Buffer” section contained in the draft Special Policy Areas policies requiring a minimum landscape buffer depth of 15 metres and restricting parking and active outdoor amenity areas within the landscape buffer. We are not aware of any studies that have been undertaken to substantiate a landscape buffer nor the rationale for it. If the rationale is to address compatibility issues between new residential uses and adjacent employment uses, we don’t understand why parking is excluded when the proposed landscape buffer will abut parking in the employment area. From our experience, there may be other appropriate mitigation measures to ensure compatibility between new residential uses and the employment lands to the east. In our opinion, appropriate mitigation, including but not limited to a landscape buffer, should be determined through a detailed compatibility study undertaken during the development approvals process. As such, we recommend that the City incorporate a new policy as follows:

Proposed sensitive land uses on properties abutting employment lands will undertake a compatibility study during the approval process to determine the appropriate mitigation measures, if required.”

We acknowledge and support the removal of the proposed north-south street along the rear of the subject site. It has been replaced by a “Mid-Block Connection”. We recommend that it be referred to as a “**Potential** Mid-Block Connection” to recognize that the need, appropriateness and/or location of such connection still needs to be determined through more detailed analyses, including future site-specific development applications. We also note that in the comment response matrix, staff note in response to our May 2023 comments that the north south street should be replaced with a mid block connection “to denote a potential pedestrian or cycling connection”. However, the revised policy does not speak to just a potential pedestrian or cycling connection but also refers to a vehicle connection which we do not support.

We recommend the following changes to this policy:

~~In order to achieve the desired transportation network, t~~The 'Potential Mid-Block Connections' shown conceptually on Schedules 13a through 13n, shall:

- a) ~~Be established~~ assessed through the development application process to determine the need, form and location of such connection. Changes to the location of the 'Mid-Block Connections' as shown on Schedules 13a through 13n will not require an amendment to this Plan provided that the general intent and purpose of this Plan is maintained;
- b) The detailed analysis of policy a) will consider:
 - I. The Improvement and consolidation of accesses to development;
 - II. The Enhancement of vehicular and/or pedestrian connections and mobility within and through the area;
 - III. The Provision of safe and accessible corridors for vehicles, pedestrians and or cyclists; and
 - IV. The provision of ~~May be subject to providing~~ public easements to the satisfaction of the City."

Further, we note that on page 4-8 under Transition Policies, a) states that, "the uses and buildings that legally existed prior to the adoption of this amendment shall be permitted to continue", and d) states that, "Notwithstanding Section x.x.x above, existing industrial uses located on lands that are designated for none-employment uses shall be recognized as permitted uses but shall not e permitted to expand except where it is demonstrated that...."

We are concerned that these transitional policies refer only to "existing industrial uses". This policy would not allow for a tenant to change that conforms to existing zoning. We recommend that d) be revised to say "existing industrial uses and permissions".

Should you have any additional questions or clarification, we would be happy to discuss them.

Yours very truly,
SGL PLANNING & DESIGN INC.



Paul, MES, MCIP, RPP
Principal

cc: Michelle Gervais, City of Brampton
Claudia LaRota, City of Brampton
Harry Glicksman, Mac Mor of Canada Ltd
Maggie Bassani, Aird & Berlis
Raymond Ziemba, SGL Planning & Design Inc.