

August 25, 2023

GSAI File: 446-006

**Peter Fay, City Clerk**

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

**Re: August 28<sup>th</sup> Planning and Development Committee Meeting  
Information Report – Major Transit Station Areas (MTSAs), Draft  
Brampton Plan Policies, City-wide  
Report: Planning, Bld & Growth Mgt-2023-708  
100 West Drive (Laurelcrest MTSA)  
Owner: CPVC 100 WEST NOMINEE INC. (Crestpoint Real Estate  
Investments Ltd.)  
City of Brampton**

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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. The Subject Property is currently being used for industrial purposes.

In the current City of Brampton Official Plan (September 2020), the Subject Property is designated as “Central Area”. In the Queen Street Corridor Secondary Plan, the Subject Property is designated as “Industrial” and “Special Study Area 2”. Furthermore, on the Queen Street Corridor Secondary Plan Land Use Schedule there is a conceptual Arterial Road shown across the Subject Property, with the “Central Area Mixed Use” designation over the same area. The Subject Property is adjacent to Provincially Significant Employment Zone 14, on the south side of Clark Boulevard.

The Subject Property is within the Laurelcrest Major Transit Station Area (“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 submitted several comment letters on the MTSA review, as well as the Official Plan review, and has participated in several meetings with staff to further discuss. Our last comment letter, dated July 27, 2023 provided a summary of all correspondence submitted to date.

We have reviewed staff's Information Report -Major Transit Station Areas (MTSAs), Draft Brampton Plan Policies, City-wide, as well as the corresponding attachments and offer the following comments and questions:

- We note that the Laurelcrest land use plan remains unchanged from previous versions, and as such we have no new comments at this time.

- We acknowledge that the proposed minimum Floor Space Index (FSI) for Mixed Use (High Rise) is 2.5 and Mixed Use (Mid Rise) is 0.5. We acknowledge that these are minimums, and we are in support of these minimum densities.
- Draft policies state that proposed parks on schedules are conceptual with size, configuration and function, location to be determined through future Precinct Planning and will be based on future needs identified by either the City or in conjunction with the processing of a development application. This seems aligned with our previous discussions with staff and we are in support of the policy as currently drafted.
- Draft policies for Mixed-Use Areas (Low-Rise, Mid-Rise and High-Rise) note that commercial and retail uses are required to be provided at grade to activate the frontage along all Primary Urban Boulevards, Secondary Urban Boulevards and Corridors. Residential uses on the ground floor are permitted along all other streets and along any rear/side property lines that do not have frontage on Primary Urban Boulevards, Secondary Urban Boulevards and Corridors. In the draft Official Plan, Queen Street is designated as a Primary Urban Boulevard. West Drive and Clark Boulevard (which the Subject Property has frontage) are neither Urban Boulevards nor Corridors. We support the policy as drafted, in that ground floor retail should only be required along Primary and Secondary Urban Boulevards and Corridors, such as Queen Street.
- The draft policies define a landscape buffer as: “a continuous area of land having a minimum depth of 15 metres provided between a lot line and the wall of a building. It shall function as a "transitional space" that physically separates and visually screens adjacent land uses. The ‘Landscape Buffer’ may function as a dual-purpose area and may include hard and soft landscaping elements such as, but not limited to, private passive outdoor amenity area, public art, landscaping (plants, berms, fences or walls) and for low impact development stormwater management purposes. Parking areas, active outdoor amenity areas and buildings are not permitted within the ‘Landscape Buffer’.”

As per one of our last discussions with staff, we were under the impression that policies speaking to landscape buffers were going to be flexible and not specify a minimum width. Flexibility in landscape buffer policies ensures that future site-specific applications can account for the local context. We encourage this draft policy to be revised to delete the minimum width.

- Draft policies on the transportation network state that the proposed street network is conceptual only, appropriate right-of-ways to be determined through development application process and sufficiently sized to accommodate LIDS. Changes to the location or alignment will not require an amendment provided the general intent and purpose is maintained. A TIS is required with development applications and for private roads, the applicant shall be responsible for providing the necessary easements and making other arrangements as may be necessary, to the satisfaction of the City. This seems aligned with our previous discussions with staff and we are in support of the policy as currently drafted.
- Draft policies on mid-block connections state that the proposed locations are conceptual only and to be established through the development application process. Changes to location will not require an Official Plan Amendment, provided general intent and purpose of this Plan is maintained. Again, this seems aligned with our previous discussions with staff and we are in support of the policy as currently drafted.

- With respect to the draft Transition policies:

*(d) Notwithstanding Section x.x.x above, existing industrial uses located on lands that are designated for non-employment uses on Schedules 13a through 13c shall be recognized as permitted uses, but shall not be permitted to expand, except where it is demonstrated that:*

*e) The proposed expansion will not adversely affect other adjacent uses due to noise, vibration, odour, lighting, dust, smoke or other impacts and that appropriate buffers, setbacks and location of the expansion will be used to mitigate impacts.*

*f) The proposed expansion will not adversely impact the ability of adjacent lands to be developed or redeveloped for the permitted uses shown on Schedules 13a through 13n, including sensitive uses (residential), due to increased noise or other impacts which would normally necessitate greater separation; and,*

*g) The proposed expansion is minor in scale and size, generally not exceeding an increase of 10% of the total gross floor area.*

It is not clear to us if points (e) through (g) are sub-policies to (d) and are therefore applicable to industrial expansions. **Furthermore, we are curious why expansions are capped at 10%? How did staff determine 10% as the acceptable threshold? If this does apply to industrial expansions, we have concerns, as this could be incredibly limiting to industrial operations and employment opportunities. We believe sub-policy (g) noted above should be deleted.**

- With are in receipt of staff's response to our previous correspondence:

*"The proposed "Employment (Prestige Industrial)" land use designation will remain on the southern portion of the site as this area is intended to act as a transition between any future sensitive land uses on the northern portion of the property (Mixed Use Areas), and the M2 industrial zoned lands located on the south side of Clark Boulevard. The proposed MTSA land use and development policies for the future redevelopment of this site can be found in Appendix 1. Staff does not believe that a site-specific policy is required to allow the continued operation of the industrial use. On the northern portion of the site that is intended to be redeveloped for nonemployment uses, expansion of any existing industrial use on these lands will be subject to meeting a set of criteria. The proposed transition policies can be found in Appendix 1." (criteria noted above)"*

As noted above, we have concerns with transition sub-policy (g) and believe it should be deleted.

We understand that following the statutory public meeting and further analysis and consideration of comments received, the proposed land use policies and schedules included in Attachment 1 will form part of Brampton Plan, which is targeting presentation to Council for adoption on November 1, 2023. We look forward to continuing to work with staff on the MTSA review and the broader Official Plan review. Thank you for the opportunity to provide these comments.



Sincerely,

**GLEN SCHNARR & ASSOCIATES INC.**

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**Jennifer Staden, MCIP, RPP**  
Associate

cc. **Michelle Gervais, MCIP, RPP**, Policy Planner, City Planning & Design  
**Claudia LaRota, MCIP, RPP**, Principal Planner/Supervisor, Policy