

(Via Email)

August 25, 2023

GSAI File: 1386-001

City of Brampton
Planning & Development Department
2 Wellington Street
Brampton, ON
L5B 3C1

Attention: Peter Fay, City Clerk
Michelle Gervais, Policy Planner, Integrated City Planning
Claudia LaRota, Principal Planner/Supervisor, Integrated City Planning

RE: City of Brampton Major Transit Station Area Official Plan Amendments
1493951 Ontario Inc.
1,11, 23, Main Street, and 21 Queen Street
City of Brampton, Region of Peel

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants for 1493951 Ontario Inc. (c/o Mr. Rehan Chaudary, Delta Mortgages), owners of the property municipally addressed as 1,11, 23, Main Street, and 21 Queen (herein referred to as the “subject lands”). The subject lands are located at the southwest corner of Main Street South and Queen Street West in the heart of Brampton Downtown. The subject lands are identified within the Brampton GO “Primary” Major Transit Station Area (PMTSA) and are proposed to be designated *Downtown Mixed Use 1*.

On behalf of our client, GSAI has been monitoring the ongoing City of Brampton Official Plan Review. GSAI submitted a letter (dated July 27, 2023) in response to the City-wide Major Transit Station Area review, specifically in reference to *Recommendation Report – “Primary” Major Transit Station Areas – Preliminary Land Use Plans, City-wide* (Report: Planning, Bld & Growth Mgt-2023-315).

We appreciate that our letter was received and responded to by staff through the subsequent *Information Report - Major Transit Station Areas (MTSAs), Draft Brampton Plan Policies, City-wide* (Planning, Bld & Growth Mgt-2023-708), dated July 31, 2023. In full, the City response stated:

It is the intent that the 'Downtown Mixed Use' designation will permit primarily institutional uses that are supported by residential, office, retail and commercial uses. Infill development will be permitted as long as it is sympathetic to the established residential areas and cultural heritage resources.

As per the Province's direction, no maximum building heights or maximum densities will be implemented in Brampton's Primary MTSAs.

In reviewing this response, while we appreciate confirmation that no maximum heights or densities will be implemented in Brampton's PMTSAs (per Provincial direction), we have concerns regarding the land use permissions or intent/vision for the "Downtown Mixed Use" designation.

Staff have confirmed in their response to GSAI that the intent of the "Downtown Mixed Use" designation is to permit "primarily institutional uses". This is shown in the Draft Brampton Plan MTSA policies:

The 'Downtown Mixed-Use' designation represents a portion of the City's downtown urban centre (Four Corners) and includes a significant concentration of the City's cultural heritage resources. This designation permits primarily institutional uses that are supported by residential, office, retail and commercial uses. Infill development shall be sympathetic to the established residential areas and cultural heritage resources. The retention of existing dwellings and building facades are encouraged. [emphasis added]

We are of the opinion that PMTSA lands should not be reserved for "primarily" institutional uses as suggested by this policy. MTSAs are generally areas where compact, mixed-use, transit-supportive development is to be directed. The language found in this Official Plan policy seems to be restrictive to support the intent of MTSAs. According to the City *Information Report* (Planning, Bld & Growth Mgt-2023-708):

Major Transit Station Areas (MTSAs) are being planned to create a compact urban form with a diverse mix of land uses, varied housing types, tenures, and affordability, and with employment and amenities in close proximity to support existing and planned transit and active transportation infrastructure

We also request clarification regarding at-grade uses along Primary Urban Boulevards in Mixed-Use Areas. Draft policies for Mixed-Use Areas (Low-Rise, Mid-Rise, and High-Rise) state:

- a) *The 'Mixed-Use Areas (Low Rise, Mid-Rise and High-Rise)' land use designations on Schedules 13a through 13n shall be developed in accordance with the Mixed-Use Area policies of this Plan.*
- b) *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. [emphasis added]*

In the Draft Official Plan, Queen Street and Main Street (south of Queen Street) are both designated as Primary Urban Boulevards. However, the “*Downtown Mixed-Use*” designation is not specified in the above draft policy, and thus the intended streetscape of the “*Downtown Mixed-Use*” designation remains unclear – especially considering the language permitting “primarily institutional uses”.

The language in the “*Downtown Mixed Use*” designation suggests that most land uses will be institutional with supporting uses. As we do not believe this meets with the spirit and intent of MTSAs, we suggest that the language describing the land use permissions in the “*Downtown Mixed Use*” designation be revised:

The ‘Downtown Mixed-Use’ designation represents a portion of the City’s downtown urban centre (Four Corners) and includes a significant concentration of the City’s cultural heritage resources. This designation permits ~~primarily~~ institutional uses that are supported by residential, office, retail and commercial uses. The designation also permits Mixed Use High-Rise uses (as described in the Mixed-Use Area policies of this plan). Infill development shall be sympathetic to the established residential areas and cultural heritage resources. The retention of existing dwellings and building facades are encouraged.

This revision would allow for greater flexibility in land use permissions that better support the Provincial direction for PMTSAs, while still requiring infill applications to have regard for residential areas and cultural heritage resources. This revision would also further clarify the requirement for commercial and retail uses at grade along Primary Urban Boulevards through the permission of Mixed Use High-Rise uses.

The general vision for MTSAs is to accommodate future growth with a diverse mix of land uses (including housing options), which support investments in existing and planned transit and active transportation infrastructure. This area of Brampton provides a unique opportunity to develop as a vibrant, pedestrian-oriented community that offers a range and mix of housing types and is well served by transit options. We feel this modification to the policy is both desirable and appropriate and still affords staff the opportunity to evaluate the appropriateness of height, built form and land use through the development application approvals process.

Conclusively, we believe that added flexibility in OP policies is appropriate to assist in achieving broader growth targets and appropriate development patterns throughout the City. Keeping a certain level of flexibility and providing clarity with the intent of OP policies will promote (re)development, while still affording staff the discretion to evaluate proposals through the development application process and technical supporting studies.

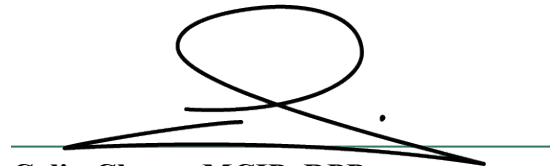
Alternatively, we would respectfully request that the subject lands be considered as a “Mixed-Use High Rise” designation.

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 of the *City Information Report* [Planning, Bld & Growth Mgt-2023-708]) will form part of Brampton Plan, which is targeting presentation to Council for adoption on November 1, 2023. Any revisions can be provided prior to the adoption of these proposed policies at the November 1, 2023 Council meeting. We are optimistic that our suggestions are logical and helpful and 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. Please do not hesitate to contact the undersigned if there are any questions.

Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Colin Chung, MCIP, RPP
Managing Partner

cc. Rehan Chaudary, Delta Mortgages