



PLANNING  
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ARCHITECTURE

October 19, 2023

Mayor and Members of Planning and Development Committee  
City of Brampton  
2 Wellington Street West  
Brampton, ON  
L6Y 4R2

Via email: [cityclerksoffice@brampton.ca](mailto:cityclerksoffice@brampton.ca)

Dear Mr. Mayor and Members of Planning and Development Committee

**RE: COMMENTS ON 4<sup>th</sup> DRAFT OF BRAMPTON OFFICIAL PLAN  
BRAMALEA CITY CENTRE & 410 / STEELES LANDS  
OUR FILE 9519Y**

MacNaughton Hermsen 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 and a group of commercial / employment properties ("410 / Steeles Lands") that are generally bound by Kennedy Road, Steeles Avenue East, Rutherford Road South and existing employment lands as shown below.



Bramalea City Centre



410 / Steeles Lands

MHBC has previously submitted comment letters on behalf of Morguard on June 3, 2022, April 17, 2023 and October 2, 2023 on the the various drafts of the Brampton Official Plan.

We appreciate staff's attention to Morguard's concerns and the on-going diligent work in refining the Official Plan. We have reviewed the fourth draft of this document released on October 17, 2023. The updated draft incorporates the recently released Major Transit Station Area ("MTSA") policies and appears to address most of Morguard's concerns. However, we have the following comments and outstanding concerns with respect to the updated Official Plan:

- 1) The draft MTSA policy chapter which was issued ahead of the fourth draft of the Official Plan included reference numbers for each policy whereas the fourth draft of the Official Plan excludes policy reference numbers. We suggest that policy reference numbers be added back to facilitate ease of navigation and administration of the document.
- 2) The MTSA section in the Official Plan includes policies dealing with permitted uses on the ground floor (referenced as Policies 4.1.1.2 b), c) and d)). These are important policies that deal with the relationship of built form and the pedestrian realm. We agree with the general intent of the policies in that non-residential uses should be provided at-grade facing Primary and Secondary Boulevards unless it is justified that they can more appropriately be located elsewhere. We recommend that the following modifications be made to the policy in order to more accurately reflect the intent of the permissions being proposed and avoid confusion:

*~~ed)~~ Notwithstanding 4.1.1.2 b) and c), ~~changes to the location of non-residential uses on the ground floor~~ area will not require may be permitted without an amendment to this Plan, provided that appropriate justification is provided to demonstrate that the non-residential ground floor area requirement can be sufficiently provided elsewhere ~~on the site in the MTSA~~ and that the general intent and purpose of the Plan is maintained.*

*~~ed)~~ Residential uses on the ground floor (except for lobby areas) are only permitted within the portion of a building that does not have frontage along a 'Primary Urban Boulevards' and 'Secondary Urban Boulevards'.*

- 3) Given that the proposed MTSA policy framework represents a fundamental shift in the planned form and function of areas identified as MTSA's, we appreciate staff's careful attention to transition policies which recognize that such fundamental changes will occur gradually over the long term. Such recognition is of utmost importance to Morguard to ensure that BCC can continue functioning as an important bricks-and-mortar retail location and adapting to the ever-changing retail market conditions. To that end, we would like confirmation that the transition policies (particularly Policy 4.1.1.17 a)) allows BCC and its out-parcel buildings to be modified and expanded and new single-storey commercial buildings to be constructed without an amendment to the plan. Such flexibility is necessary in order for BCC to continue thriving as a successful and cohesive shopping centre as it gradually intensifies with residential and other uses over time.

We appreciate your consideration of these comments. If you require any additional information, please do not hesitate to contact us.

Yours truly,  
**MHBC**

A handwritten signature in black ink, appearing to read 'Gerry Tchisler', written in a cursive style.

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

*cc: Official Plan Review Team, [opreview@brampton.ca](mailto:opreview@brampton.ca)*