

October 20, 2023

By E-mail to cityclerksoffice@brampton.ca

Shannon Brooks-Gupta
Manager, Official Plan & Growth Management
Integrated City Planning - Planning, Building & Growth Management Department
Corporation of the City of Brampton
2 Wellington Street West
Brampton, ON L6Y 4R2

Attention: Mr. Peter Fay, City Clerk

Ms. Brooks-Gupta,

**Re: Draft Brampton MTSA Land Use Schedules and Policies
Comments of QuadReal Property Group**

We ("Urban Strategies Inc.") are urban planning and urban design consultants retained by QuadReal Property Group ("QuadReal"), owner of 8 Silver Maple Court within the Dixie "Primary" MTSA. We write to provide further comment on the draft MTSA land use schedules and development policies proposed to be presented to the Planning and Development Committee of Council on October 23, 2023.

We recognize that the draft MTSA policies within Official Plan Chapter 4 Site and Area Specific Policies have been amended since their tentative incorporation into the September 2023 version of the Final Draft Brampton Plan, now out for public comment. Further to the comments provided by email on October 6, 2023 (and enclosed), the following comments relate to the amended draft MTSA policies available as of October 16, 2023 on the City's MTSA webpage: <http://www.brampton.ca/mtsa>.

Non-Residential Frontage Requirement

While generally supportive of the policies directing intensification and transit-supportive development in the Dixie MTSA as well as the proposed High-Rise Mixed-Use land use designation for 8 Silver Maple Court, we encourage the City to reconsider the approach to Mixed-Use Areas policies 4.1.1.2 (b), (c), and (d) regarding commercial, institutional and retail uses at grade along all Primary Urban Boulevards and Secondary Urban Boulevards.

In our opinion the forthcoming updates to the Queen Street Corridor Secondary Plan present a more appropriate opportunity to study and specify the extent of mandatory commercial, institutional and retail frontages along Boulevards in a context-specific manner such that site-specific conditions are considered and other block-level approaches to public realm activation are not precluded. Rather than applying a uniform approach and requirement along all boulevards through Brampton Plan, this would

allow for a more nuanced consideration of opportunities and challenges for commercial, institutional and retail activation along the Queen Street corridor.

We are supportive of policy approaches that would facilitate the activation of Primary and Secondary Urban Boulevard frontages through grade-related active uses that encourage pedestrian activity and greater interaction between the public realm and adjacent privately owned development. Active frontages at grade may be achieved, in our opinion, by both non-residential and residential uses, or by a mix of the two. To this end we ask that the use of “active frontages” terminology be considered in these City-wide policies, as well as the focus placed on encouraging or discouraging certain uses, rather than requiring or prohibiting them.

The following revisions are requested to Policy 4.1.1.2 Mixed-Use (Low-Rise, Low-Rise Plus, Mid-Rise and High-Rise):

- (b) *For lands designated ‘Mixed-Use’ (High-Rise) on Schedules 13a - 13n, ~~commercial, institutional and retail~~ active frontages uses shall be provided on the ground floor of buildings facing along ‘Primary Urban Boulevards’ and ‘Secondary Urban Boulevards’ identified on Schedule 1 ~~to activate the frontage~~. Commercial, institutional and retail These uses are also encouraged along these frontages and throughout the ‘Mixed-Use’ designation.*

The “active frontages” terminology is consistent with the policy direction related to the form and function of Boulevards and Major Transit Station Areas (Chapter 2) and to gateways and edges (Chapter 3) in the September 2023 Final Draft Brampton Plan.

- (c) *Notwithstanding 4.1.1.2 b), changes to the location of non-residential ground floor area will not require an amendment to this Plan, provided that appropriate justification is provided to demonstrate that ~~the~~ ground floor non-residential uses ~~area requirement~~ can be sufficiently provided elsewhere on the site and that the general intent and purpose of the Plan is maintained.*

It is unclear what is meant by “ground floor area requirement” in the language as drafted. The above suggestion is offered for clarity.

- (d) *Except for active uses, ~~R~~residential uses on the ground floor are ~~only permitted~~ discouraged within the portion of a building that ~~does not have~~ frontage along a ‘Primary Urban Boulevards’ and ‘Secondary Urban Boulevards’.*

Motor Vehicle Related Uses

While we understand the policy direction aimed at reducing the dominance of certain auto-oriented uses within Brampton’s MTSAs, we would suggest that the uses listed in Policy 4.1.1.2 (e)(i) in and of themselves would not directly and adversely impact the ability to meet the minimum densities prescribed on Table 3, unless such uses are proposed in stand-alone buildings rather than incorporated into the non-residential portions of mixed-use buildings. To this end, the following revisions are suggested for consideration:

(i) *The following uses are not permitted on lands designated 'Mixed-Use' on Schedules 13a – 13n as they would adversely impact the ability to meet the minimum density prescribed on Table 3, and the achievement of the City's MTSA objectives:*

- i. Stand-alone motor vehicle related uses, such as repair, body shop, service station or gas bars, washing, sales and leasing establishments;*
- ii. Outdoor storage; and truck trailer parking;*
- iii. Any use permitted within either a Class II or III in accordance with the D6-1 Industrial Categorization Criteria of the Provincial D-6 Guideline; and,*
- iv. Drive-through facilities.*

Design of New and Retrofitted Streets

We are generally in support of draft policies in section 4.1.1.10 Transportation Network and request a minor modification to part (e) of this policy, as follows:

(e) *All proposed new and retrofitted streets will be developed ~~in accordance~~ with regard to Brampton's Complete Street Guidelines.*

As the Complete Street Guidelines evolve and are refined, flexibility in their application to private and public streets may be important.

We thank you in advance for consideration of the above revisions. Should you have any questions, please contact the undersigned directly.

We continue to ask for notice of further revisions to the draft MTSA policies, including notice of any additional meetings and Council's decision. We also wish to be added to the formal circulation for all matters regarding the City of Brampton Official Plan.

Yours very truly,

URBAN STRATEGIES INC.



Tatjana Trebic, RPP, MCIP
Senior Associate

Encl.: As above.

c.c. Claudia LaRota, City of Brampton
Michelle Gervais, City of Brampton
Edwin Li, City of Brampton
Leah Forte, QuadReal Property Group
Christine Fang-Denissov, Urban Strategies Inc.

Subject: Brampton Plan - Comments on Final Draft Official Plan

Date: Friday, October 6, 2023 at 5:14:18 PM Eastern Daylight Time

From: Tatjana Trebic

To: shannon.brooks@brampton.ca, claudia.larota@brampton.ca, OP Review, MTSA

CC: Christine Fang-Denissov

Good afternoon,

I would like to submit the following comment on the draft MTSA policies being incorporated into Chapter 4 of the Final Draft Official Plan.

Organization	Commenter	MTSA	Section or Policy Reference	Nature of Comment	Comment
Urban Strategies c/o QuadReal Property Group 8 Silver Maple Court	Tatjana Trebic	Dixie	Special Land Use Policy Areas - Major Transit Station Area Policies – Land Uses	Revision Requested	While generally supportive of the policies directing intensification and transit-supportive development in the Dixie MTSA as well as the proposed High-Rise Mixed-Use land use designation for 8 Silver Maple Court, we encourage the City to reconsider the approach to Mixed-Use Areas policy (b) regarding commercial and retail uses at grade along all Primary Urban Boulevards and Secondary Urban Boulevards. In our opinion the forthcoming updates to the Queen Street Corridor Secondary Plan would present a more appropriate opportunity to study and specify the extent of mandatory commercial and retail frontages along Boulevards in a context-specific manner such that site-specific conditions are considered and other block-level approaches to public

				<p>realm activation are not precluded. Rather than applying a uniform approach and requirement along all boulevards through Brampton Plan, this would allow for a more nuanced consideration of opportunities and challenges for commercial and retail activation along the Queen Street corridor. To this end the following revisions are requested:</p> <p><i>Commercial and retail uses are required encouraged 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 encouraged to be located 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.</i></p>
--	--	--	--	--

Please let me know if you have any questions or would like to discuss the request further.

Thank you,
Tatjana

Tatjana Trebic MCIP, RPP, MCP, B.Eng. (she/her)
Senior Associate

URBAN STRATEGIES INC.

197 Spadina Ave. Suite 600, Toronto ON Canada M5T 2C8
ttrebic@urbanstrategies.com Tel: 416 340 9004 x 357
www.urbanstrategies.com

Written with gratitude from the traditional territory of the Anishinaabe, including the Mississaugas of the Credit, Haudenosaunee, and Huron-Wendat (Wyandot), who have stewarded these lands with care since time out of mind.
The content of this email is the confidential property of Urban Strategies Inc. and should not be copied, modified, retransmitted, or used for any purpose except with written authorization of Urban Strategies. If you are not the intended recipient, please delete.