

October 20, 2023

GSAI File: 446-006

To: 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: October 23rd Planning and Development Committee
Recommendation Report: Proposed Adoption of the City of
Brampton 2023 Official Plan (Brampton Plan)
Report Number: Planning, Bld & Growth Mgt-2023-876
Comments on Behalf of CPVC 100 WEST NOMINEE INC.
(Crestpoint Real Estate Investments Ltd.)
100 West Drive (Laurelcrest MTSA)
City of Brampton**

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 been following the Official Plan review, as well as the MTSA review and has been engaged in many discussions with City staff on same. Please see previous correspondence dated October 2, 2023 and correspondence dated July 27, 2023 attached which summarizes all of our correspondence and discussions with staff to date, with respect to 100 West Drive.

We note that previous drafts of the Official Plan included a site-specific policy for the Subject Property to protect for the continuation and expansion of the current industrial operations on the property. In the updated Official Plan (September 2023 version) the proposed site-specific policy has been removed and we understand the current industrial land uses (and expansion, alteration and/or redevelopment thereof) are protected under the “MTSA Transition” policies:

“4.1.1.17 Transition Policies

The transformation of MTSA’s into vibrant mixed-use areas will have regard for existing industrial uses in the vicinity. The introduction of sensitive land uses is to be mitigated and/or phased accordingly to ensure land use compatibility. Uses existing in the zoning by-law are permitted to continue, however, they are ultimately intended to be redeveloped in conformity with the land use designations shown on Schedules 13a - 13n.

a) The redevelopment of existing low-rise uses in accordance with the land use designations shown on Schedules 13a - 13n may occur gradually over the long-term. Notwithstanding the land use designations and the minimum floor space index in Table 11, new buildings, building additions, and/or alterations may be permitted, where it can be demonstrated that it does not preclude the desirable planned redevelopment of the MTSA, including the consideration to improve multi-modal access and connectivity through-out the MTSA.

...”

Whereas the previous draft transition policies capped industrial expansion to 10%, we note that this cap has since been deleted, **which we are in support of**. Our previous comments noted concerns with the arbitrary 10% cap, as it could severely limit industrial operations, employment opportunities and tenant possibilities. As such, we would encourage this flexibility to be maintained at the time that Secondary Plan policies are drafted.

Furthermore, we believe the second half of the above-noted policy should be deleted: “*where it can be demonstrated that it does not preclude the desirable planned redevelopment of the MTSA, including the consideration to improve multi-modal access and connectivity through-out the MTSA.*” We believe this part of the policy is ambiguous. The intent seems to be regarding land use compatibility and interface between industrial uses and future mixed-uses, however land use compatibility and interface seem well addressed within other policies in the MTSA chapter.

We commend staff for their many years of hard work on the Official Plan review and MTSA review and thank you for the opportunity to provide comments.



Sincerely,

GLEN SCHNARR & ASSOCIATES INC.

Jennifer Staden, MCIP, RPP
Associate

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

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 28th 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**

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.

Jennifer Staden, MCIP, RPP
Associate

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

July 27, 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: July 31st Planning and Development Committee Meeting
Recommendation Report – “Primary” Major Transit Station Areas –
Preliminary Land Use Plans, City-wide
Report: Planning, Bld & Growth Mgt-2023-315
100 West Drive (Laurelcrest MTSA)
Owner: CPVC 100 WEST NOMINEE INC. (Crestpoint Real Estate
Investments Ltd.)
City of Brampton**

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.

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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). The Subject Property has been overlaid on the latest Land Use Concept for the Laurelcrest MTSA released in June 2023 (see *Attachment 1*).

Summary of Correspondence/Discussions

GSAI has made several letter submissions and has had several discussions with staff regarding the Official Plan review process and MTSA review process with respect to our clients' lands. We have summarized our correspondence and meetings with staff to date:

- On January 19, 2023, GSAI participated in the Laurelcrest MTSA focus group discussion regarding the draft, preliminary land use concepts. The preliminary land use plan showed our clients' lands as "Medium Density Mixed-Use", "Light Industrial Mixed-Use" at the south end of the property, "Proposed Open Space" along the Highway 410 and between residential and industrial land uses, with proposed conceptual streets and mid-block connections.
- Letter correspondence from GSAI to staff dated February 28, 2023 highlighted that the December 2022 version of the draft (parent) Official Plan, proposes to redesignate the Subject Property in its entirety to "Mixed Use" designation, however industrial uses are not permitted in Mixed Use designations. This was therefore inconsistent with the MTSA review/land use plans which illustrated industrial land uses on the southern portion of the property. We recommended adding policies in the draft Official Plan under the "Mixed Use" land use permissions to explicitly permit continued/expanded industrial uses on the entirety of the Subject Property, while still protecting for future residential redevelopment in the future. We also recommended to staff that should industrial uses cease to exist on the Subject Property in the future, the southern portion of the lands should also allow mixed use permissions for redevelopment, given the Subject Property's proximity to the future Queen Street BRT.

Our February correspondence also noted that any lands designated as future open space on our clients' lands, should count towards parkland dedication in future development applications. We noted our support for buffers and policies to reduce and/or mitigate interface land use compatibility between industrial uses and future residential uses/mixed uses. We also commended staff's position that in accordance with Minister Clark's correspondence to Peel Regional Chair Nando Iannicca, building height maximums would be removed from MTSA policies.

- On April 3, 2023, GSAI, the client team and staff participated in a virtual meeting to discuss the benefits and planning merits in carrying the "High Density Mixed-Use" designation southerly on our clients' lands, along the Highway 410 corridor. Staff also confirmed their "Medium Density Mixed-Use" designation was envisioned for redevelopment around 12 storeys (not historical medium density developments such as 3 storey townhouses). Staff also stated that a site-specific policy for the Subject Property in the draft Official Plan was intended to protect for continued industrial uses and future residential/mixed-use redevelopment.

As per our discussion, staff agreed to take back our request to extend the “High Density Mixed-Use” designation southerly across our clients’ lands, and noted they would be internally discussing the buffers/proposed open spaces and as to whether these buffers/open spaces were envisioned as private or public spaces. This has since been addressed (see below).

- On April 24, 2023 a second letter correspondence was submitted from GSAI to staff summarizing the April 3rd call and providing comments on the draft MTSA Official Plan Amendment. GSAI commended staff for the flexibility incorporated into many draft policies. We encouraged staff to review their policies regarding Tertiary Plans and whether they should be required for all as-of-right-development and site plan, minor variance applications.

With respect to staff’s site-specific policy for the Subject Property in the draft parent Official Plan, we requested revisions to the policy text (see below for details).

- On May 26, 2023 staff responded to our email correspondence regarding the proposed wording for the site-specific policy in the draft Official Plan, stating that comments would be responded to in a matrix at the time the next draft Official Plan is released (expected Q3 of 2023).

As per our April discussion with staff, they advised they would review our proposed revisions to the draft Official Plan policy for consideration. GSAI continues to await feedback on our proposed revised wording for the site-specific policy (see below).

- On June 16, 2023, revised land use concepts were released for the MTSAs. On July 13, 2023 GSAI and the client team participated in a follow-up call with staff to discuss the updated Laurelcrest land use concept. The revised land use concept extended the “High Density Mixed-Use” designation southerly along the Highway 410 corridor, which we are in support of (and as discussed during our April 3rd call) (see *Attachment 1*). GSAI discussed with staff whether all lands designated as High or Medium Mixed-Use would require commercial at-grade for apartment buildings (which seems excessive and could potentially lead to market saturation). Staff acknowledged that was not the intent, and that retail at-grade would not be a requirement as per forthcoming policies, but would be looked at on a site-by-site basis.

We discussed the conceptual “open space”/buffers shown on the land use concept and staff stated they don’t anticipate any policies to comment on the exact amount or width of buffers, but rather these details would be explored through future private development applications.

We also discussed with staff the new “proposed park” shown on our clients’ lands on the latest iteration of the land use concept. We confirmed with staff that the exact location is conceptual. The final location will be confirmed through, and at the time of future private

development application for mixed use and/or residential redevelopment and may be influenced by the alignment of future roads. Staff confirmed that redevelopment of the Subject Property for continued industrial uses would not warrant the need for the proposed park.

Staff also confirmed that the conceptual roads shown on the land use concept are conceptual in nature and that a Traffic Impact Study (as part of a private development application) will inform final need and location, especially with respect to the north/south conceptual road which dissects the industrial block at the south end and could limit redevelopment potential. GSAI reiterated that we encourage policies to be flexible with respect to urban parks, and that the park hierarchy as per the parent Official Plan should consider smaller urban parks, less than 2 hectares.

GSAI also noted in this discussion with staff, the introduction of a “proposed pedestrian bridge” crossing Highway 410 from the west onto our clients’ lands. Staff confirmed the pedestrian bridge is not a requirement, however only a “wish list” item which depends on future infrastructure planning/feasibility and would be subject to Ministry of Transportation approval. Staff confirmed this would not be at the land owner’s expense, and if it was to be part of a future private development application, it would contribute as Development Charge exemption. GSAI encouraged staff to consider incorporating future policies into the Secondary Plan which recognize that pedestrian connectivity could potentially also be achieved via the Clark Boulevard widening over the 410. This could potentially reduce costs/process (including MTO approvals) and reduce redundancy.

As per our discussion, staff noted they would consider our feedback on reducing size requirements for urban parks in the park hierarchy in the parent Official Plan, and at the time Secondary Plan policies are drafted, would consider building in flexibility to account for options for pedestrian connectivity across Highway 410 (and that the proposed pedestrian bridge shown on our clients’ lands is desired, not required). Staff advised their Secondary Plan policies would not require retail at-grade for all apartment buildings in this area, and that Secondary Plan policies will highlight that park and road locations on the land use plans are conceptual only, to be refined through private development applications. GSAI looks forward to reviewing the draft policies when prepared.

- In July 2023 GSAI have submitted to staff proposed revised wording for the site-specific policy in the draft (parent) Official Plan:

“2. Special Land Use Policy Area 2: Clark Boulevard / West Drive

*The Special Land Use Policy Area in the vicinity of Clark Boulevard and West Drive identifies an area with long term potential for high density residential development. a) Notwithstanding the Neighbourhood designation of those lands within the Special Land Use Policy Area designation on Schedule 12 of this Plan, within the vicinity of Clark Boulevard and West Drive, ~~only~~ **the continuation and expansion of industrial uses will be permitted until such time which the owner of the lands choose to redevelop for residential/mixed use purposes** ~~predominant existing uses have been relocated or are proposed to be relocated or~~*

~~to cease operations.~~ b) ~~At such time as the predominant existing industrial users have indicated their intention to relocate or cease operations,~~ the City will consider **development of the Neighbourhood designation** ~~an amendment to this Plan,~~ subject to appropriate studies, to provide for the transition of this site to an appropriate mix of higher order uses.”

Special Land Use Policy Area 2 text is written in that the continuation of industrial uses is contingent upon the continuation of current tenants. The land uses for the Subject Property should not be influenced by tenancy. This could limit the opportunity of a new tenant moving in, utilizing the existing building, or furthermore preclude opportunities for a new tenant. If a new tenant moves into the existing building, or there is demand for a larger industrial building on the Subject Property, the Official Plan policies should not preclude these opportunities.

Furthermore, we do not think that an Official Plan Amendment should be required to fulfil the MTSA vision of mixed-use and/or residential land uses on our clients’ lands, when an OPA is not required for the balance of the MTSA lands. We therefore request the MTSA land use designation of “High/Medium Density Mixed-Use” for the Subject Lands with the Special Land Use Policy Area (as per our revised wording above) as an overlay.

We understand the aforementioned Recommendation Report is before Planning and Development Committee for approval, which includes the revised land use concepts for the MTSA. Further to the endorsement of the land use concepts, detailed policies for the MTSA are expected to be released for review in September 2023, which we look forward to reviewing. GSAI is in support of the Laurelcrest MTSA land use concept and commends staff for their efforts to date. We look forward to continuing to work with staff on the MTSA review and the broader Official Plan review, particularly on the outstanding items noted above. Thank you for the opportunity to provide these comments.

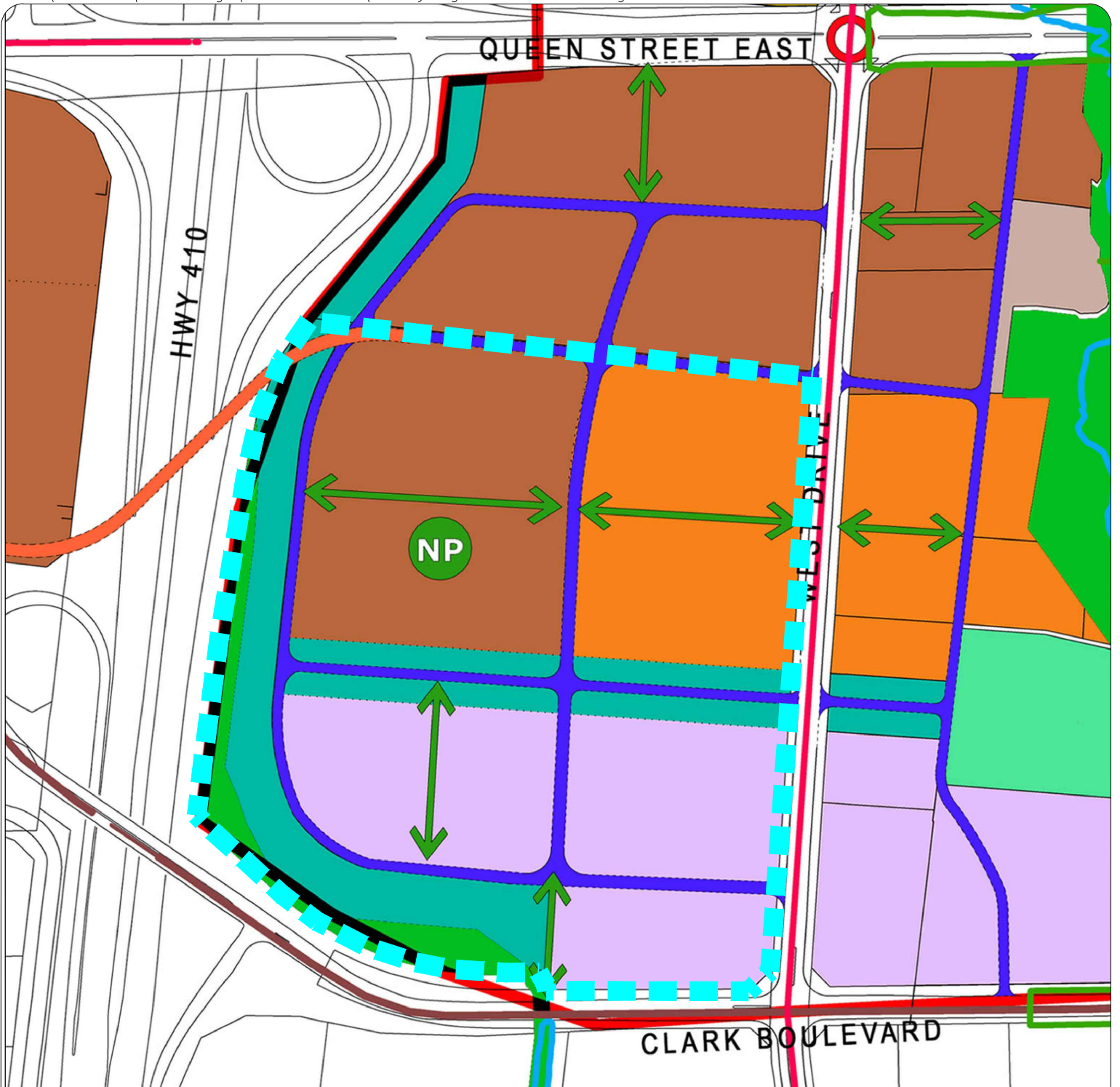
Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Jennifer Staden, MCIP, RPP
Associate

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



LOW-RISE RESIDENTIAL	PROPOSED PUBLIC OR PRIVATE STREET NETWORK	EXISTING ACTIVE TRANSPORTATION NETWORK LINK
MID-RISE RESIDENTIAL	MID-BLOCK CONNECTION	PROPOSED MULTI-USE PATH / BOULEVARD PATH
MID-RISE MIXED-USE	PROPOSED PEDESTRIAN BRIDGE	PROPOSED PROTECTED BIKE LANE OR CYCLE TRACK
HIGH-RISE RESIDENTIAL	PROPOSED LANDSCAPE BUFFER	TRCA FLOODLINE
HIGH-RISE MIXED-USE	NATURAL HERITAGE SYSTEM	HEIGHT TRANSITION AREA
INSTITUTIONAL	EXISTING OPEN SPACE	
PRESTIGE INDUSTRIAL	MTSA BOUNDARY	
PROPOSED PARK	MTSA STATION	

FIGURE 1 CITY OF BRAMPTON MTSA LAURELCREST STREET STATION DRAFT LAND USE PLAN

100 WEST DRIVE,
BLOCK B, PLAN 895 CHINGUACOUSY
CITY OF BRAMPTON,
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS
JUNE 30, 2023

LEGEND

Subject Lands