

January 15, 2024

Dorothy Yeung, Planner/Development Coordinator  
Urban in Mind, Professional Urban Planning, Land Development & CPTED Consultants  
3390 South Service Road, Unit 204, Burlington

Dear Dorothy,

**Re: 245 Commercial Street Site Modifications  
Town of Milton, The Regional Municipality of Halton  
Traffic Opinion Letter**

CGE Consulting is pleased to submit this Traffic Opinion Letter in support of the site modifications located at 245 Commercial Street, in the Town of Milton, The Regional Municipality of Halton.

Urban in Mind is submitting an application to change the internal use of the existing building from office space to medical clinic and office space. No structural changes are proposed on site. However, there will be a slight modification to the parking spaces configuration to meet the Town's parking space dimensions. Urban in Mind retained CGE Consulting to prove a traffic opinion letter as part of the site plan application.

The Town specifically requested a traffic opinion letter to address the following comments:

1. "Traffic and Planning Staff request that a Traffic Opinion Letter be provided, stamped by a P.Eng., that confirms the proposed change in use isn't exceeding or unduly aggravating existing traffic generation. A one-to-two-page letter is sufficient.
2. Planning Staff cannot support the introduction of a new use or added gross floor area associated with a high-generating traffic source without justification; this is an item that Town Council is likely to raise questions in regard and will seek confirmation that justification has been provided."

Pre-consultation comments were received from the Town of Milton, which have informed the general work program for the traffic opinion letter, and have been included in **Appendix A**.

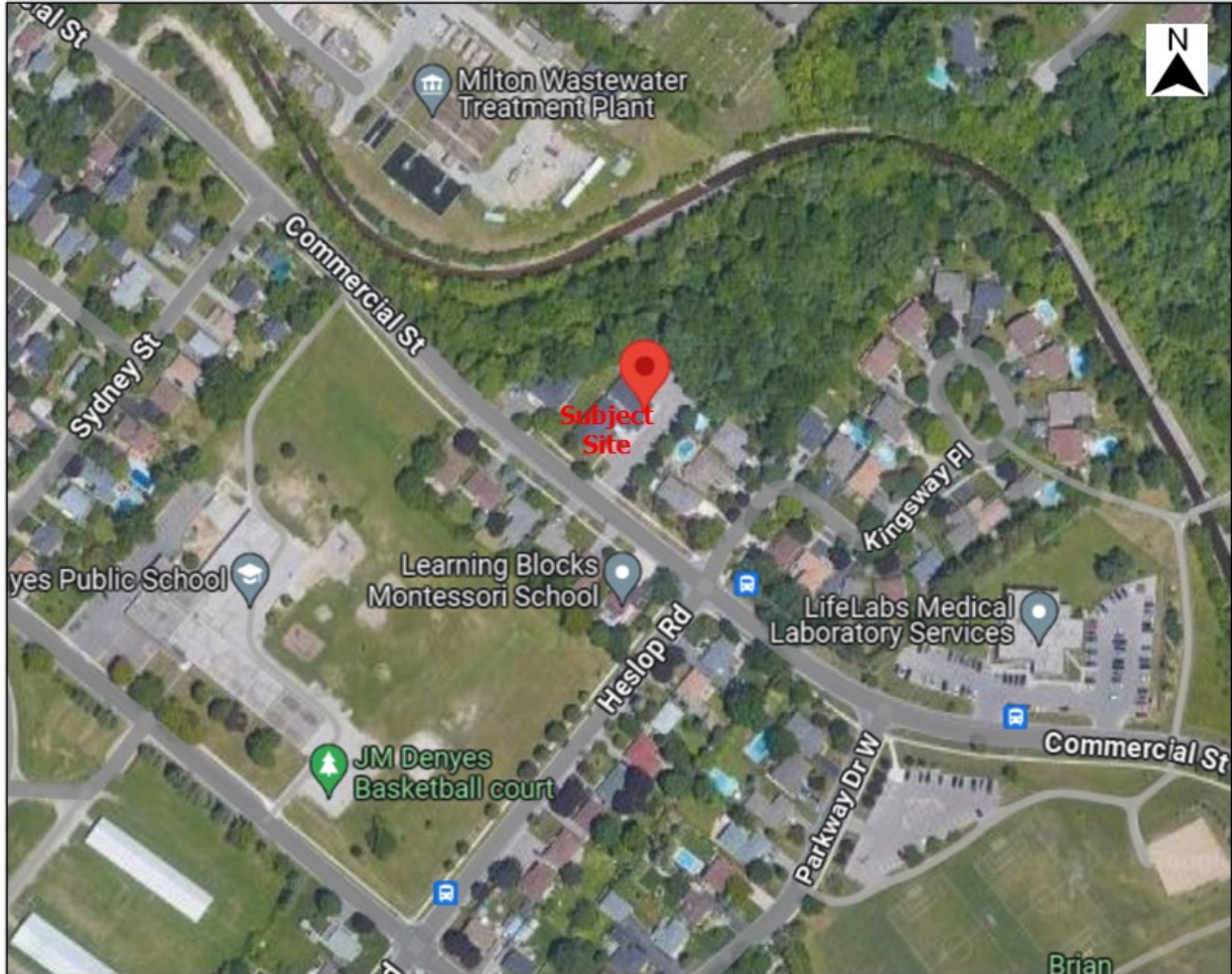
## **1.0 EXISTING CONDITIONS**

The site is located within a residential area and is surrounded by residential homes to the south and west, a natural wood lot area and water body to the north and east. The

property is located on the east side of Commercial Street. Access to the site is provided by a private driveway to Commercial Street.

The location of the proposed site is illustrated in **Figure 1**.

**Figure 1 Subject Site Location**



Source: Google Maps

Transit service is available within walking distance of the bus stop located at the southeast corner of Commercial Street and Heslop Road/Kingsway Place intersection. Sidewalks and shared cycling facilities are provided on both sides of Commercial Street. Therefore, there is ample transportation demand management measure available to provide alternative modes of transportation.

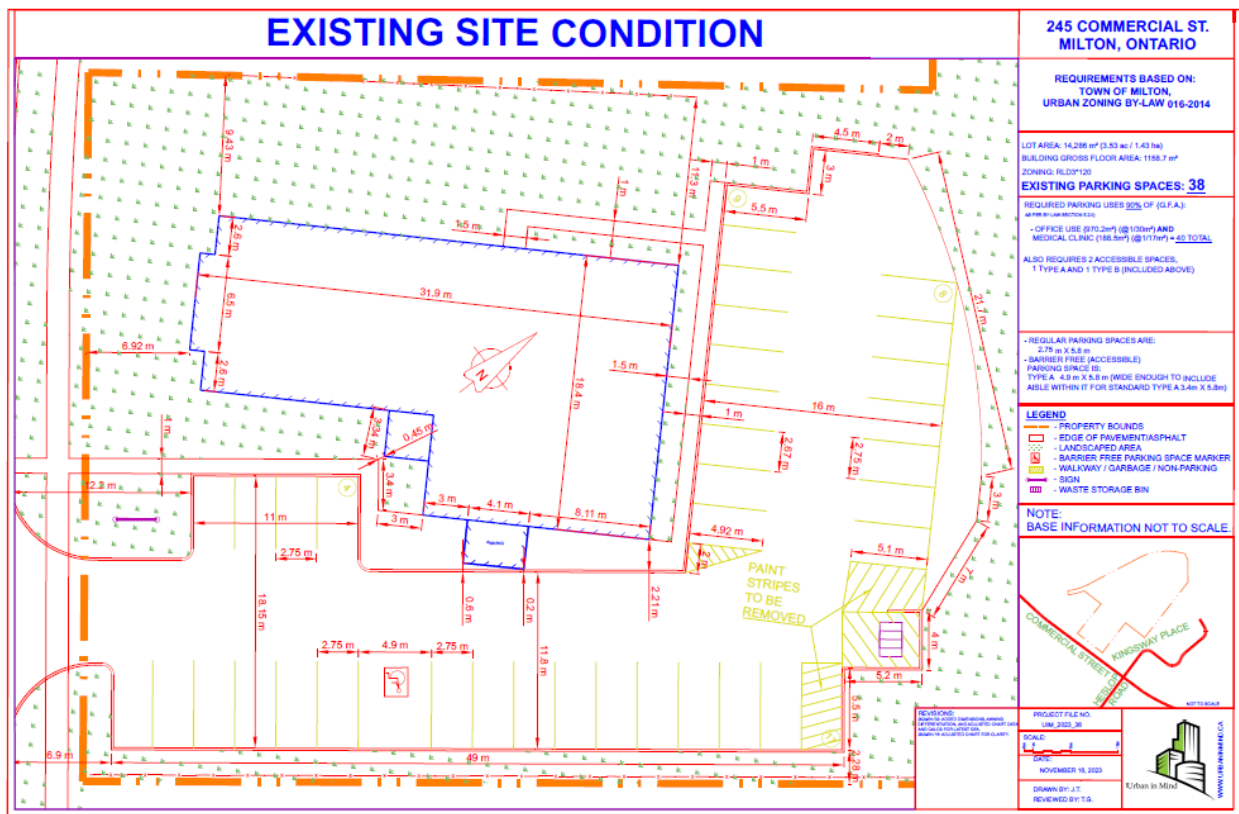
Images of Commercial Street and the general area were taken during the site visit on Saturday January 6, 2024, and are provided in **Appendix B**.

## 2.0 PROPOSED CHANGES

This traffic opinion letter is based on the subject site having proposed changes to existing internal use from office space to medical clinic and office space. There will be no structural changes within or outside of the building.

The proposed site plan prepared by Urban in Mind, dated November 16, 2023, is shown in **Figure 2**.

**Figure 2 Proposed Site Plan**



## 3.0 TRIP GENERATION

As mentioned above, it is our understanding that there will be no structural changes within or outside of the building, therefore the GFA of the building will remain the same. Thus, the subject site will not generate any additional traffic and the existing traffic volume is expected to remain the same.

## 4.0 PARKING ASSESSMENT

The Town’s Comprehensive Zoning By-law 016-2014 (Consolidation March 2023), the minimum required parking standards for office and medical clinic are as follow:

### Section 5.2 Calculation of Parking Requirements

*ii) For the purposes of calculating required parking, the Gross Floor Area shall not include any area intended, designed or used exclusively for the parking of a motor vehicle and minus 10%.*

#### Medical Clinic

- 1 parking spaces per 17m<sup>2</sup> gross floor area

#### Offices

- 1 parking space per 30 m<sup>2</sup> of gross floor area

**Table 1** summarizes the minimum parking requirement calculations for the subject site under The Town’s Comprehensive Zoning By-Law.

**Table 1 The Town’s Zoning Parking Requirement Summary**

Land Use	Required Number of Parking Spaces			Provided Number of Parking Spaces
	By-law 016-2014			
	GFA (m <sup>2</sup> )	Rate (spaces/m <sup>2</sup> )	Total	
Medical Clinic	188.5	1/17 m <sup>2</sup>	11	38
Office	970.2	1/30 m <sup>2</sup>	33	
<b>Total Vehicle Parking Spaces</b>			<b>44</b>	<b>38</b>
<b>Applying the 10% (As per By-law Section 5.2.ii)</b>			<b>40</b>	

Based on the Town of Milton Comprehensive Zoning By-law, the vehicle parking supply of 38 parking spaces (including two barrier free spaces one Type A and one Type B) doesn’t meet the Town’s Zoning By-law requirements and is short by two parking space.

Due to the type of businesses on site and the option of remote work availability, it is not anticipated to have a peak parking demand of all parking spaces all at once. The probability of this happening is very slim. Additionally, the available alternative modes of

travel such as public transit and cycling facilities in close proximity of the site would potentially further reduce the need for parking spaces.

## **5.0 SUMMARY AND CONCLUSION**

It is our opinion that the proposed changes to the site will not impact the existing site generated traffic and the overall traffic operations on the road area network.

The parking supply doesn't meet the Town's Zoning By-law requirements; however, the type of businesses on site have different time parking demands and the available alternative travel modes in proximity of the site will further reduce the need for parking spaces. Therefore, the parking supply of 38 parking spaces should be sufficient to meet the site parking needs.

Should you have any questions regarding this study, please do not hesitate to contact the undersigned.

Yours truly,

CGE TRANSPORTATION CONSULTING



Casey Ge, P.Eng.  
President

**APPENDIX A – Pre-Consultation Comments**  
**APPENDIX B – Photos of the Area**

***Appendix A***  
***Pre-computation Comments***



Town of Milton  
 150 Mary Street  
 Milton, ON L9T 6Z5  
 905-878-7252  
 www.milton.ca

December 20, 2023

Dorothy Yeung  
 Urban In Mind Planning

Dear: Dorothy,

**Re: Record of Comment Letter - Proposed Planning Act Application**

Proposal: Zoning By-law Amendment application to permit additional 'Medical Clinic' gross floor area  
 Applicant: Urban in Mind Planning  
 Owner: 10033795 Ontario Inc.  
 Location: 245 Commercial Street

CIRCULATION		
Town Departments	Status	Pending
Development Services - Development Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Development Services - Building	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Development Services - Development Engineering	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Development Services - Infrastructure/Traffic	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Development Services - Zoning	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community Services - Parks and Facility Planning	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Corporate Services - Development Finance	<input checked="" type="checkbox"/>	<input type="checkbox"/>
External Commenting Agencies		
Region of Halton Legislative Planning	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Conservation Halton	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Halton District School Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Bell Canada	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBMISSION REVIEW		
Documents	Prepared by:	Date
Record of Pre-Consultation	Rachel Suffern	November 08, 2022
Cover Letter	Urban in Mind	n/a
Application Form	Urban in Mind	n/a
Planning Justification Brief	Urban in Mind	November 10, 2023
Draft Zoning By-law Amendment	Urban in Mind	November 30, 2023
Floor Plans (L1 and L2)	Fine Lines Design	n/a
Site Plan	Urban in Mind	November 16, 2023

**General Comments on Submission:**

**Development Services - Development Review**

1. General Comments on the Formal Application Submission:

- a) The next submission will be the formal Zoning By-law Amendment application under the Planning Act and will be processed in accordance with the prescribed timelines under the Planning Act.

Should the applicant wish to re-submit a revised pre-submission comments to address Town comments, Planning Staff will facilitate this at no added review cost.

- b) For a complete submission, please submit the Zoning By-law Amendment application form, required fees and all materials identified in the Record of Pre-Consultation, this Record of Comment and any additional materials required to address comments in this Record of Comment.
- c) The remaining fee required for the Zoning By-law Amendment Application will be confirmed upon finalizing the gross floor area. The fee can be paid via a cheque made payable to the Town of Milton and can be submitted either by mail or in person (Drop Box or at Cashiers in the Main Lobby) to the attention of Tammy Howe, Planning Administrator at Town Hall at 150 Mary Street, Milton. Please provide the following information with all cheque payments: Applicant/Owner Name, Site Address and File Number (if known).

## 2. Draft Zoning By-law Amendment

- a) The draft by-law should be updated to include a maximum gross floor area associated with the 'Medical Clinic' permissions.

## 3. Traffic Analysis

- a) Traffic and Planning Staff request that a Traffic Opinion Letter be provided, stamped by a P.Eng., that confirms the proposed change in use isn't exceeding or unduly aggravating existing traffic generation. A one to two page letter is sufficient.
- b) Planning Staff cannot support the introduction of a new use or added gross floor area associated with a high-generating traffic source without justification; this is an item that Town Council is likely to raise questions in regard and will seek confirmation that justification has been provided.

## 4. General Comments

- a) Please provide fully dimensioned floor plans to confirm gross floor area of the building.

Additional comments may follow during subsequent submissions. Please reach out directly with any questions relating to the Record of Comment.

Rachel Suffern, MPA, M.Sc., MCIP, RPP  
Planner, Development Review  
[rachel.suffern@milton.ca](mailto:rachel.suffern@milton.ca)

Development Services - Building

These comments are provided to assist with the future building permit application:



- Provide design/working drawings (including a complete OBC data matrix) relevant to the scope of work for all disciplines (architectural, structural, mechanical, etc.) prepared and certified by a design professional (architect, professional engineer)
- The firefighting provisions shall conform to OBC Div.B-3.2.5.
- The barrier-free requirements shall conform to OBC Div.B-3.8.
- Analysis of compliance to OBC Div.B-3.2.3. Spatial Separation may affect the exterior wall construction
- Provide soil bearing tests for underlying soil conditions as part of the structural review at time of Building Permit application
- Energy efficiency design of the building shall conform to OBC Div.B-12.2.1.2.
- Municipal address must be indicated on all drawings, documents, and forms

Ereny Yousef  
Plans Examiner III  
Ereny.Yousef@milton.ca

#### Development Services - Development Engineering

Please see attached comments, dated December 15, 2023, prepared by Greg Schicht.

Greg Schicht  
Development Engineering Technologist  
[rihanna.johnston@milton.ca](mailto:rihanna.johnston@milton.ca)

#### Development Services - Infrastructure & Traffic

Traffic Staff request that a Traffic Opinion Letter be provided, stamped by a P.Eng., that confirms the proposed change in use isn't exceeding or unduly aggravating existing traffic generation. A one to two page letter is sufficient.

Chris Toews  
Transportation Engineering Technologist  
[chris.toews@milton.ca](mailto:chris.toews@milton.ca)

#### Development Services - Zoning

Current Zoning: Future Development (FD) under Urban Zoning By-law 016-2014

Proposed Zoning: RLD3\*120 (Residential Low Density 3) \*120 (Site specific) and NHS (Natural Heritage System)

1. Please confirm the total gross floor area of the building? At the original pre-consultation meeting held on June 13, 2023 the gfa of the building was noted as 11,978 sq ft (1112.79 m<sup>2</sup>), and this submission notes a gfa of the building to be 939.4m<sup>2</sup>. Please explain why this is? What has changed or been removed?
2. Confirm, the parking area changes? Are you just proposing to re-stripe the existing parking spaces or are curb changes proposed as well?
3. Re-striping the parking area will result in a loss of 3 existing parking spaces on site. We don't generally want to remove existing parking spaces when proposing to add a new use to the site which has a higher parking rate (requiring more parking).
4. Any new proposed parking areas or changes to the existing parking areas and parking spaces shall comply with the minimum setbacks and size requirements set out in Section 5 of the Zoning By-law.

- a. Parking areas shall be setback at minimum 3.0m from a lot line (Section 5.12 Table 5L)
  - b. Parking areas shall be setback at minimum 2.2m from a building (Section 5.12 Table 5L)
  - c. Minimum length of a perpendicular parking space shall be 5.8m long (Section 5.8 Table 5D)
  - d. Minimum drive aisle accessing parking spaces is 6.0m (Section 5.7 Table C)
5. Required parking based on the 939.6m<sup>2</sup> GFA Building, as indicated in this proposal
- |                         |  |                            |
|-------------------------|--|----------------------------|
| Office use area         | 751.1m <sup>2</sup> - 10% / 30 = 23        |                            |
| Medical Clinic use area | 188.5m <sup>2</sup> - 10% / 17 = <u>10</u> |                            |
|                         |  | 33 required parking spaces |
| (2 accessible)          |  | 35 provided (2 accessible) |
6. Parking requirements may change upon confirmation of GFA of the building.
  7. GFA means the total area of all floors measured between the exterior face of the exterior walls of the building or structure at the level of each floor, excluding of any basements used for storage purposes and /or for the parking of a motor vehicle.
  8. Provide fully dimensioned floor plan drawing.

Sherri Jamieson  
Zoning Officer  
[Sherri.Jamieson@milton.ca](mailto:Sherri.Jamieson@milton.ca)

Community Services - Parks and Facility Planning

Similar to our June 2023 pre-consultation comments, Parks and Facility Planning, Community Services has no concerns with or specific comments re: the proposed medical clinic use within the existing multi-unit commercial/office building at 245 Commercial St as it is our understanding no physical development is associated with this application at this time. The Applicant is advised however, that if any exterior expansions are requested in the future which increase the existing gross floor area, staff reserve the right of re-examine the proposal and reassess comments issued to-date.

**SUBMITTALS**

Review and approval of the pre-submission materials circulated are deferred to other Town departments/external agencies at this time.

Renata Tracey, MCIP, RPP  
Parks Planner  
[renata.tracey@milton.ca](mailto:renata.tracey@milton.ca)

Corporate Services - Development Finance

1. Regional development charges and educational development charges are applicable in accordance with the appropriate agency's policies and by-laws. Town development

charges and other charges are applicable on any future development in accordance with Town policies and by-laws and other applicable legislation. All development charge inquiries should be directed to [DevelopmentFinance@milton.ca](mailto:DevelopmentFinance@milton.ca) or by calling 905-878-7252, extension 2402.

2. Municipal property taxes must be current prior to approval. Inquiries with respect to property taxation should be directed to 905-864-4142 or [taxes@milton.ca](mailto:taxes@milton.ca).

Dee Dee Fitzpatrick  
Supervisor, Development Finance  
[MB-DevelopmentFinance@milton.ca](mailto:MB-DevelopmentFinance@milton.ca)

Halton Region - Legislative Planning

Please see attached comments, dated December 15, 2023, prepared by Velimir Lazarevic.

Velimir Lazarevic  
Intermediate Planner  
[velimir.lazarevic@halton.ca](mailto:velimir.lazarevic@halton.ca)

Conservation Halton

Please see attached comments, dated December 18, 2023, prepared by Heather Dearlove.

Heather Dearlove  
Environmental Planner  
[hdearlove@hrca.on.ca](mailto:hdearlove@hrca.on.ca)

Halton District School Board

Since this Pre-Submission application does not add any housing units or impact schools, HDSB will not have comments.

Michelle D'Aguiar  
Senior Analyst - Planning  
[daguiarm@hdsb.ca](mailto:daguiarm@hdsb.ca)

Bell Canada

Upon receipt of this comment letter, the Owner / Applicant is to provide Bell Canada with servicing plans / Composite Utility Plan (CUP) at their earliest convenience to [planninganddevelopment@bell.ca](mailto:planninganddevelopment@bell.ca) to confirm the provision of communication/telecommunication infrastructure needed to service the development.

The following paragraphs are to be included as a condition of approval for any Draft of Plan of Subdivision, Draft Plan of Condominium and/or Site Plan application(s):

*"The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further agrees and acknowledges to convey such easements at no cost to Bell Canada.*

*The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost."*

The above-noted conditions will remain in effect until said conditions are officially cleared by Bell Canada as part of the formal approval process.

To ensure that we can provide detailed provisioning comments, and to subsequently clear conditions, please ensure that all servicing plans / CUP, including updates to such plans, are sent to [planninganddevelopment@bell.ca](mailto:planninganddevelopment@bell.ca).

Concluding Remarks:

Thank you for the opportunity to actively participate in this process. To ensure that we can continue to monitor and actively participate in the planning process, please continue to circulate all planning applications, including formal circulations, pre-circulations and re-circulations to [circulations@wsp.com](mailto:circulations@wsp.com).

We note that WSP operates Bell Canada's development tracking system, which includes the intake and processing of municipal circulations. However, all responses to circulations and requests for information, such as requests for clearance, will come directly from Bell Canada, and not from WSP. WSP is not responsible for the provision of comments or other responses.

**Next Steps - Submission Requirements**

This Record of Comment Letter concludes the Pre-Submission Review stage of the Town's mandatory Pre-Application Process. All comments contained within this Record of Comment are to be addressed in the submission of a Planning Act Application. The circulation comments must be addressed in a letter or comment matrix, noting how each item has been addressed.

Upon submission of a Planning Act Application, Town Staff will review the submission for completeness and issue a Notice of Complete Application within 30 days of the Application being received.

Sincerely,

Rachel Suffern, MPA, M.Sc., MCIP, RPP  
Planner, Development Review  
✉ [rachel.suffern@milton.ca](mailto:rachel.suffern@milton.ca)

Attach:

Development Engineering Comments

Halton Region Comments

Conservation Halton Comments

***Appendix B***  
***Photos of the Area***

# 245 Commercial Street



Various types of business, shared in old church building.



**Private property signs on site property**



**Sightline from site entrance  
East Side of Commercial Street – Facing North**



**Sightline from site entrance  
East Side of Commercial Street – Facing South**



**No parking permitted East side of Commercial Street**





**Facing South**

**Parking permitted West side of Commercial Street (urban shoulders)  
Shared car/bike lanes in both directions**



**East side, facing North.**

**Shared car/bike lanes in both directions**



**Children playing sign (hearing impaired child(s) in area)**

**School zone signs**

**Unposted 50km/h except when lights flashing (40km/h)**

# GENERAL PICTURES OF SITE

