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RE: 141-153 PLAINS ROAD WEST TRANSPORTATION IMPACT STUDY AND PARKING STUDY, AND ACCESS AND CIRCULATION REVIEW, RESPONSE TO CITY OF BURLINGTON TRANSPORTATION PLANNING COMMENTS

In February 2024, Paradigm Transportation Solutions Limited (Paradigm) prepared a Traffic Response Letter for the planned development of 141-153 Plains Road West in the City of Burlington.

The purpose of this letter is to respond to City of Burlington comments on the February 2024 Traffic Response Letter, received on 2024-04-29. The City's comments are identified in ***bold italics***, with responses summarized below in roman.

This letter should be read in conjunction with the February 2024 Traffic Response Letter and the updated Transportation Impact Study, Parking Study and Access and Circulation Review dated September 2024.

City Comment #1: Site Context

The Burlington Official Plan 2020:

a. Schedule B, Urban Structure, shows the subject property within Mixed Use Nodes and Intensification Corridors,

b. Schedule B-1, Growth Framework, shows the subject property within a Primary Growth Area,

c. Schedule B-2, Growth Framework and Long-Term Frequent Transit Corridors, shows Plains Road West as an MTSA Primary Connector with Frequent Transit Corridor,

d. Schedule C, Land Use - Urban Area, shows the subject property within the Urban Corridor- Employment,

e. Schedule G, Aldershot GO MTSA Special Planning Area, shows the subject property within the MTSA Special Planning Area,

f. Schedule O-1, Classification of Transportation Facilities – Urban Area, classifies Plains Road West as a Multi-Purpose Arterial,

g. Schedule P, Long Term Cycling Master Plan, shows Plains Road West has a Bike Lane.

Acknowledged.

City Comment #2:
The Integrated Mobility Plan (IMP) identifies the Preferred Network Solution:
a. Shows the subject property within an Enhanced Pedestrian Realm,
b. Shows Plains Road West as part of the Bicycle On-Road Spine Network,
c. Shows Plains Road West as an existing Protected Bikeway,
d. Shows Plains Road West on the Truck Priority Network.

Acknowledged.

City Comment #3:
Plains Road West has a four-lane basic cross-section with a two-way left-turn lane (center turn lane) as well as protected on-street bicycle lanes on both sides of the road. It has a posted speed limit of 60 km/h.

Acknowledged.

City Comment #4: Deemed Right-of-Way Width – No Additional Lands Required
The deemed Right-of-Way width per the Zoning By-Law for Plains Road West is 36 meters. The existing Right-of-Way adjacent to the subject site is approximately 36 metres and no additional lands are required.

Acknowledged.

City Comment #5: Daylight Triangles

Acknowledged. The subject site has frontage to only one municipal roadway. No daylight triangle can be formed.

City Comment #6: Visibility Triangles

The driveway access to Plains Road West shall be designed to provide 5 m x 5 m visibility triangles on either side of the driveway, behind the property line, and fully within the subject site. The visibility triangles shall be illustrated and identified on the site plans, noting "nothing shall exceed 1.0-meter height within visibility triangles."

The site architect has incorporated 3 m x 3 m visibility triangles into the site plan. The visibility triangles include a note indicating *Elements within triangle shall not exceed a height of 1 m above the elevation of the street pavement or the level of the travelled portion of the street.*

A visibility triangle measuring approximately 6 m x 6 m can be achieved when the vertices of the visibility triangle are placed at the near edge of the municipal sidewalk. The proposed built

form and landscaping between the building and sidewalk are not expected to impede driver-pedestrian sightlines.

The site driveway will be designed with continuous sidewalks through the driveway to prioritize pedestrians overturning vehicles. Continuous sidewalks communicate to people walking that they have an uninterrupted travel path, while also communicating to drivers that they are crossing a space for walking. On the site driveway approach, a stop sign and stop bar are proposed.

City Comment #7: Automobile Parking Supply

The parking supply is calculated based on the Zoning By-Law Table 1.2.6: Off-Street Parking Standards.

a. Apartment buildings within a Primary Growth Area, as identified on Schedule B-1 of the City Official Plan, require 1.25 spaces per unit inclusive of visitor parking.

b. Residential units: 131

c. Parking space required: 164

The site is located within the Aldershot GO Major Transit Station Area (MTSA) and is subject to the Community Planning Permit (CPP) By-law.[1] CPP rates are not yet in effect, the OPA/ZBA application is being filed due to timing constraints to maintain funding commitments for the purpose-built rental building.

Under the Planning Act[2] vehicle parking, other than bicycle parking, can not be regulated inside a MTSA. Planning Act Part V Land Use Controls and Related Administration, Zoning By-Laws Section 3.4 (1.1) Restriction, Parking Facilities notes the following:

> *(1.1) Despite paragraph 6 of subsection (1), a zoning by-law may not require an owner or occupant of a building or structure to provide and maintain parking facilities, other than parking facilities for bicycles, on land that is not part of a highway and that is located within,*
>
> *(b) an area delineated in the official plan of the municipality surrounding and including an existing or planned higher order transit station or stop, within which area the official plan policies identify the minimum number of residents and jobs, collectively, per hectare that are planned to be accommodated, but only if those policies are required to be included in the official plan to conform with a provincial plan or be consistent with a policy statement issued under subsection 3 (1);*

Table 1 summarizes the vehicular parking requirements for the site based on the CPP in comparison to the proposed parking supply. The proposed parking supply is in line with the parking requirements outlined in the CPP.

[1] City of Burlington, *Community Planning Permit By-law*, (Burlington: City of Burlington, 2024).
[2] Government of Ontario, *Planning Act, RSO 1990 c P.13*, (Ontario: Government of Ontario, 2024) Section 34, 1.1

TABLE 1: REQUIRED VEHICULAR PARKING SUPPLY

Land Use	Parking Type	Minimum Parking Rate	Maximum Parking Rate	Parking Spaces Required	Parking Spaces Provided
Residential (150 units)	Residential	No minimum	1.20 parking spaces per dwelling unit	Zero to 180	103
	Visitor	No minimum	0.15 parking spaces per dwelling unit	Zero to 22	5
	Accessible Parking	1+3% (If odd + 1 Type B)	-	2 Type 'A' 3 Type 'B'	2 Type 'A' 3 Type 'B'
	Electric Vehicle	20% of parking spaces	-	22	22
	'Designed' Electric Vehicle	80% of parking spaces	-	90	90
Non-Residential (173 m^2)	Retail	No minimum	4.4 spaces per 100 m^2 GFA	Zero to 7	4
	'Designed' Electric Vehicle	10% of parking spaces	-	1	1
Total				**2 to 209**	**112**

City Comment #8:

The architectural plans demonstrate that the proposed development will provide 110 parking spaces (incl. 6 BF spaces).

a. Underground: 102 parking spaces

b. Surface: 8 parking spaces

A total of 112 parking spaces are proposed. The supply consists of 100 underground parking spaces and 12 surface parking spaces, including five Barrier Free (BF) parking spaces.

City Comment #9:

Since the mezzanine level above the ground floor was removed from the Pre-Con second submission, the parking numbers were reduced from 167 to 110. Any proposed reduction in parking supply will require a parking justification study.



Refer to the response to City Comment #7 and City Comment #8.

City Comment #10:

The notes in the Site Plan drawing state that parking is provided at the rates outlined in the Burlington Draft Community Planning Permit By-law dated October 2023, 5.19.1 (a). Transportation Planning cannot support a parking reduction based on the draft CPP bylaw.

Refer to the response to **City Comment #7**.

City Comment #11:

The Accessibility Coordinator will provide comments on accessible parking space size, supply, and signage.

Acknowledged. Five accessible parking spaces are provided (2 Type 'A', 3 Type 'B'). All accessible parking spaces are located at grade.

City Comment #12: Bicycle Parking Supply

The bicycle parking supply shall meet the requirements recommended by the July 2017 Burlington City-Wide Parking Standards Review:

a. Residential - Apartment Land Use: 0.5 long-term plus 0.05 short-term bicycle parking spaces per unit.

b. Retail - 3 short-term spaces + 1 space/1000 m2 GFA and 2 long-term spaces plus 1 space/1000 m2 GFA

The site is located within the Aldershot GO Major Transit Station Area (MTSA) and is subject to the Community Planning Permit (CPP) By-law.[3] CPP rates are not yet in effect, the OPA/ZBA application is being filed due to timing constraints to maintain funding commitments for the purpose-built rental building.

Table 2 summarizes the vehicular parking requirements for the site based on the CPP in comparison to the proposed parking supply. The proposed parking supply of 23 short-term, 105 long-term, and 7 large bicycle parking spaces is in line with the parking requirements outlined in the CPP.

[3] City of Burlington, *Community Planning Permit By-law*, (Burlington: City of Burlington, 2024).

TABLE 2: REQUIRED BICYCLE PARKING SUPPLY

Land Use	Parking Type	Minimum Parking Rate	Parking Spaces Required	Parking Spaces Provided
Residential mixed-use building (150 units)	Short Term	0.1 spaces per dwelling unit	15	23
	Long Term	0.5 spaces per dwelling unit	75	105
Retail (173 m^2)	Short Term	0.2 spaces per 100m^2 GFA (min. 3)	3	23
	Long Term	0.1 spaces per 100m^2 GFA (min. 2)	2	105
Total	**Short Term**	**-**	**18**	**23**
	Long Term	**-**	**77**	**105**
	Large Bicycles	**5% of total**	**7**	**7**

City Comment #13:

Bicycle parking shall be shown and labeled on the site plan. The Applicant proposes 131 apartment units, which requires:

• Residential use:

a. 66 long-term bicycle parking spaces in an indoor and secure location.

b. 7 short-term bicycle parking spaces, preferably in a sheltered location close to the front door of the building.

• Retail use:

a. 2 long-term bicycle parking spaces in an indoor and secure location.

b. 1 short-term bicycle parking space, preferably in a sheltered location close to the front door of the building.

Each bicycle parking space shall be 60 cm x 1.8 meters in size.

Bicycle parking is shown and labelled on the site plan. Covered short-term parking is provided on the east side of the site near the main and secondary entrances. Long term and large bike parking is located at the north end of the site on the ground floor and is located on the south and northeast corner of the underground parking levels.

City Comment #14:

The architectural plans demonstrate a total of 118 long-term bicycle parking spaces and 20 short-term bicycle parking spaces which meet the requirements.

a. Short-term bicycle parking spaces are shown in the ground floor plan drawing in appropriate locations.

b. Long-term bicycle parking spaces are shown on the ground floor - 16 spaces and underground parking - 102 spaces, which are in secure locations.

Refer to the response to **City Comment #13**.

City Comment #15: Transportation Impact Study

Transportation Planning provided their acceptance of the Transportation Impact Study submitted with the Pre-Con, second submission application, which was prepared by Paradigm Transportation Solution Limited dated April 2023.

Acknowledged.

City Comment #16: Transportation Planning Position

Transportation Planning cannot support the OPA / ZBA application unless the Applicant / Owner / Developer submits a Parking Justification Study and Transportation Demand Management and Implementation Strategy, and we provide our approval.

Refer to **Section 4 Transportation Demand Management** and **Section 5 Parking Review** within the Transportation Impact Study, Parking Study, and Access and Circulation Review (September 2024 TIS) for the Transportation Demand Management and Implementation Strategy and the Parking Justification Study.

Under the Planning Act[4] vehicle parking, other than bicycle parking, can not be regulated inside a MTSA. The proposed parking supply is in line with the parking requirements outlined in the CPP. Refer to the response to **City Comment #7**.

TDM measures proposed include:

- Walking
  - Safe, attractive, and direct walkways for pedestrians linking building entrances with public sidewalks are provided;
  - All on-site sidewalks conform to City of Burlington and Accessibility for Ontarians with Disabilities Act (AODA) design standards;
  - A continuous sidewalk along the subject site's frontage on Plains Road West is provided; and

[4] Government of Ontario, *Planning Act, RSO 1990 c P.13*, (Ontario: Government of Ontario, 2024) Section 34, 1.1

- The outdoor space has amenities such as benches, seating areas and pedestrian scale lighting.

- Cycling
  - Short-term bicycle parking – refer to **Table 2** above.
  - Lont-term bicycle parking – refer to **Table 2** above.
  - Short-term bicycle parking is provided on ground floor, adjacent to the main building entrance.
  - Long-term bicycle parking is provided in secure indoor rooms/areas; and
  - Short-term bicycle parking is located at grade near primary and secondary building entrances.
- Transit Infrastructure
  - A one-time subsidized transit pass will be provided to occupants who do not purchase or need parking; and
  - Sidewalks connect directly to the adjacent sidewalk network and Burlington Transit stops at Howard Road, and west of Daryl Drive.
- Parking
  - Parking is unbundled from the cost of the units;
  - The parking supply is managed to limit the sale of spaces to a maximum of 2 spaces per unit;
  - Parking costs reflect the full cost of building and operating the parking facility; and
  - Visitor parking will be monitored and enforced to avoid disruption to the local community.
- Wayfinding, Travel Planning, Education/Promotion
  - Travel planning resources will be provided to residents (individualized marketing, active transportation maps, community resources, transit schedules);
  - Wayfinding signage is provided in the lobby or near the main entrance; and
  - Marketing material promotes a strong TDM brand.

City Comment #17: Site Access

Transportation Planning support the proposed access location and dimensions. Access width and curb radius dimensions are as per the City of Burlington Site Plan Guidelines.

Acknowledged.

City Comment #18: Underground Parking Layout

Transportation Planning support the proposed underground parking layout. All dimensions are per the City of Burlington Site Plan Guidelines.

a) Parking stall sizes are depicted with 2.75m width and 6.0m length.

b) Where parking space is limited on one or both sides by a wall or column, stall width was increased by 30 cm for each obstructed side.

c) Structural columns are set back 0.5m on both sides of the driving aisle to provide 7.0m clear (face of column to face of column)

Dimensions are included on the site plan. The site plan includes 18 small vehicle parking spaces.

City Comment #19: Pedestrian Facilities

The site design has proposed pedestrian access and continuity with an enhanced pedestrian realm implemented along the building frontage on Plains Road West, providing a connection between the residential entrances and the sidewalk, which is supportable.

Direct connections to the municipal sidewalk are proposed. Refer to the Landscaping Plan for more detail.

City Comment #20: Internal Traffic Signage and Pavement Marking

Any internal traffic signage such as "stop sign", "one way", "no parking", "fire route", accessible parking, and pavement markings shall be indicated and depicted on the site plan.

Refer to **Appendix E** of the September 2024 TIS for the proposed signage and pavement marking plan.

City Comment #21:

The Stop Sign "Ra-1" and Stop bar shown in the Site Plan drawing cannot be located in the public right of way. All traffic signage must be on private property.

Refer to **Appendix E** of the September 2024 TIS for the proposed signage and pavement marking plan. The stop sign and stop bar on the driveway approach are located in private property.

City Comment #22: Vehicle Manoeuvring Diagram

The Stop Sign "Ra-1" and Stop bar shown in the Site Plan drawing cannot be located in the public right of way. All traffic signage must be on private property.

Refer to **Appendix D** of the September 2024 TIS for the updated AutoTURN analysis.

The end parking spaces may require drivers to perform a multipoint turn to exit the space. Note the design vehicle used is a TAC P, which is comparative in size to a large SUV. Furthermore, these parking spaces will be assigned to occupants who will be familiar with the spaces and how to access them.



City Comment #23: Construction and Mobility Management Plan (CMMP)

The applicant shall submit a Construction Mobility Management Plan (CMMP) as a part of the site plan application which shall be to the satisfaction and approval of the Director of Transportation Services or Designate.

Acknowledged. A CMMP will be completed prior to the start of construction to the satisfaction and approval of the Director of Transportation Services or Designate.

City Comment #24: Transportation Demand Management (TDM) and Implementation Strategy

The applicant shall submit a Transportation Demand Management (TDM) and Implementation Strategy as a part of the site plan application which shall be to the satisfaction and approval of the Director of Transportation Services or Designate.

Refer to **Section 4 Transportation Demand Management** within the September 2024 TIS for the Transportation Demand Management and Implementation Strategy. Refer to the response to **City Comment #16** for a list of the proposed TDM measures.

City Comment #25: Street Lighting

Street Lighting Photometric Drawings, Temporary Photometric and Electrical Drawings and final Electrical Drawings, for the public rights-of-way abutting this development will be required.

Electrical consultant to provide required drawings.

We trust that this letter adequately addresses the comments from the City of Burlington.

Yours very truly,

PARADIGM TRANSPORTATION SOLUTIONS LIMITED



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