



Barristers & Solicitors

Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, Ontario M5H 2S7

Telephone: 416.979.2211
Facsimile: 416.979.1234
goodmans.ca

Direct Line: 416.597.4299
dbronskill@goodmans.ca

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Delivered

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

Attention: Peter Fay, City Clerk

Dear Sirs/Mesdames:

Re: Item 7.1 – Proposed Amendments to Brampton Plan – Major Transit Station Area Policies

We are solicitors for Brampton Mill Nelson Limited Partnership and Amdev (Brampton) Limited Partnership in respect of various properties in Downtown Brampton. Our client owns properties throughout the MTSA in Downtown Brampton, including a prominent corner site (23-29 Mill Street North and 53 Nelson Street) proposed for a 48-storey residential building. We are writing on behalf of our client to provide comments in respect of the above-noted matter.

In 2023, our client became active in Downtown Brampton, which is identified as one of the City's three designated Major Growth Areas. Currently, Downtown Brampton is notably underutilized with low-intensity uses initially developed years ago. As noted previously, our client supports the City's efforts to transform Downtown Brampton into a vibrant mixed-use, transit-supportive and complete community. While making its investments, our client has recently examined key emerging elements and influences shaping Downtown Brampton and is excited to work with the City to unlock its potential and help shape it into a complete community.

The existing Downtown Secondary Plan dates back twenty-five years (1997) and our client is on the public record supporting a policy update for the area. However, our client is concerned with the proposed amendments to the Brampton Plan that would enable maximum building height and density policies for Primary Major Transit Station Areas through future Precinct Plans and/or Secondary Plan amendments, including within Downtown Brampton.

The vision for Downtown Brampton should focus on promoting growth and optimizing land and infrastructure in the area, including through the transformation of the existing transit station into a transit hub with investments from all levels of government. There is also a mix of existing health, technology and innovation uses and good access to parks and open spaces, meaning Downtown is

primed to be a vibrant, intense and active core for the City. Recent development approvals in Downtown Brampton recognize this potential with heights ranging from 25-storeys to 48-storeys.

Our client previously expressed concern with the policy context for certain areas within Downtown Brampton, including an emerging land use plan that limited high-density land use opportunities in Downtown Brampton focused adjacent to the GO station with considerable areas envisioned to be medium-density/mid-rise even though they fall within a 500 metre radius of the transit station and are well-separated from existing low-rise uses outside the PMTSA boundary. As a result, our client previously noted that consistency with the Provincial Policy Statement (2020), conformity with the Growth Plan for the Greater Golden Horseshoe (2019), and conformity with the Region of Peel Official Plan required the removal of any limit on building heights and/or densities.

The policy direction recommended in the above-noted matter would exacerbate this flawed approach. Building heights should not be limited by policy in Downtown Brampton, let alone through proposed maximums. Such an approach appears to be based more on a reaction to recent and current development interests than good planning and would not optimize the use of land within the PMTSA for future high-density development opportunities.

We would appreciate receiving notice of any decision in this matter.

Yours truly,

Goodmans LLP



David Bronskill
DJB/