

April 5, 2024

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

Via email: [cityclerksoffice@brampton.ca](mailto:cityclerksoffice@brampton.ca)

Dear Mr. Mayor and Members of Planning and Development Committee;

**RE: COMMENT LETTER – PROPOSED AMENDMENTS TO BRAMPTON PLAN  
MAJOR TRANSIT STATION AREA POLICIES  
BRAMALEA CITY CENTRE  
OUR FILE 9519Y**

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MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) is retained by Morguard Corporation (“Morguard”) with respect to the Bramalea City Centre (“BCC”) located at 25 Peel Centre Drive. BCC is a successful regional shopping centre containing approximately 1.5M square feet of retail and office space on 33 hectares of land. The BCC property is split between both the Dixie Road and Central Park Drive Major Transit Station Areas (“MTSA”).



Bramalea City Centre

MHBC has previously submitted comment letters on behalf of Morguard pertaining to the MTSA process on May 16, 2023, and October 19, 2023.

We understand that the Committee will be considering an amendment to the MTSA policies in the recently adopted "Brampton Plan", the new official plan for the City. The amendment will, among other things, permit the implementation of maximum building heights and densities within Primary MTSA through the secondary plan / precinct plan process. The amendment also includes policies for unlimited height and density for properties that are directly abutting a higher order transit station or stop and in the Queen Street and Highway 410 area.

Restrictions to height and density can pose significant challenges to redevelopment and intensification and should only be applied when absolutely necessary and when there are clear and substantial objectives to be achieved. The City's urban growth centre and MTSA are the City's primary intensification areas and therefore it is imperative that redevelopment in these areas be encouraged through a supportive policy and regulatory framework that ensures these areas can develop to their full potential.

We understand that part of the reason for the recommendation to implement maximum heights and densities is to encourage a variety of building typologies and densities, acknowledging that there have recently been proposals for 60+ storey towers which, in the opinion of staff, do not provide an appropriate range of housing types.

It should be considered whether there is really a perceptible or meaningful difference between a 60+ storey tower (which would be permitted adjacent to a higher order transit stop) and a 25 – 40 storey tower (which would be permitted elsewhere along a Primary Transit Corridor) as it relates to enforcing a variation in building typology or density. Additionally, taller towers may actually provide an opportunity to increase the supply of larger units given scale economies that can be reached with taller buildings. The concept of a variety in building typology and density should also be considered within the context of the entire City. There are many opportunities throughout the built up area of the City to intensify lands outside of MTSA in accordance with specifically defined maximum building heights and density which will contribute achieving such variety. Instead of inserting maximum building heights as part of official plan policy, development within MTSA should be guided by urban design guidelines that take into account the surrounding development context.

Should Council proceed with supporting the implementation of height and density limits within MTSA we request that the BCC lands be included in the unlimited height and density policy that is proposed for the Queen Street / Highway 410 area. BCC currently contains one of the City's largest transit terminals based on the number of transit routes accommodated, includes GO transit access and is on the future Queen Street Bus Rapid Transit route. BCC is unique in that it is a single 33 hectare parcel of land located directly on the Queen Street corridor. This sheer size and consolidated nature of ownership allows land use conflicts, servicing issues and other such development-related matters to be resolved largely without reliance on or impacts to abutting land owners. Additionally, both Morguard and the City of Brampton have committed to making significant investments to alleviate the flood plain constraints in the area of the BCC lands. Allowing for the BCC lands be included in the unlimited height and density policy would support this planned investment. These conditions make the BCC lands an ideal candidate for unlimited height and density permissions.

We appreciate your consideration of these comments.

Yours truly,  
**MHBC**

A handwritten signature in black ink, appearing to read 'Gerry Tchisler', written in a cursive style.

Gerry Tchisler, M.Pl., MCIP, RPP  
Partner

cc. [mtsa@brampton.ca](mailto:mtsa@brampton.ca)