

Attachment D: May 2024 MTSA Open House Comment and Response Table

- May 22, 2024 Letter from Ambria (Church) Limited
- June 10, 2024 Letter from MHBC (Morguard) re: Bramalea City Centre
- June 11, 2024 Letter from TACC HOLBORN (BLOCK 140) INC.

**May 2024 MTSA Open House
Comment and Response Table**

Comment	Staff response
1. Ambria (Church) Limited. Letter dated May 22, 2024	
<ul style="list-style-type: none"> Clarify the height and future zoning permissions that will apply to their properties, which were recently subject to a rezoning approval. 	<ul style="list-style-type: none"> Properties that have been recently rezoned (within the past 5 years) are not currently being considered as part of the pre-zoning process in Phase 3. Landowners have the option to submit a specific written request to the MTSA team, if they wish to have the zoning standards amended that apply to their parcel(s) through Phase 3 of the MTSA study.
2. The Bramalea City Centre (“BCC”) located at 25 Peel Centre Drive - Morguard Corporation (“Morguard”) represented by MHBC. Letter dated June 10, 2024	
<ul style="list-style-type: none"> The height mapping should be reflective in-principle planning approvals for greater heights than what is currently being permitted in this study. A cap on FSI is already controlled through building height restrictions. Park adjacent to Bramalea Terminal should be located at the south end of the site to integrate into the existing trail system. Is additional open space warranted given the amount of parkland existing in the surrounding area? 	<ul style="list-style-type: none"> Properties that have been recently rezoned (within the past 5 years) are not currently being considered as part of the pre-zoning process in Phase 3. FSI is necessary to address different performance standards, additional to height. The proposed park location is conceptual. The need and exact location will be determined through future development approvals.
TACC HOLBORN (BLOCK 140) INC. Letter dated June 11, 2024	
<ul style="list-style-type: none"> It is not appropriate for the City to suggest where the various heights should be located within it. It is not appropriate for the City to suggest the building massing 	<ul style="list-style-type: none"> it is a “demonstration” plan to show a potential or conceptual distribution of heights/built form, but not intended to be part of the approved documents. This is just for illustration purposes



May 22, 2024

City of Brampton
Planning, Building and Growth Management
2 Wellington Street West
Brampton, Ontario L6Y 4R2

via email: mtsa@brampton.ca

Attention: Michelle Gervais, MCIP, RPP
Policy Planner, Integrated City Planning

**RE: Ambria (Church) Limited
1, 1A, 3 Sophia Street and 120, 122, 126, 128 Church Street E., City of
Brampton
MTSA Study Phase 2b Official Plan Amendments**

Ambria (Church) Limited (“Ambria”) is the registered owner of 120, 122, 126, 128 Church Street East and future owners of 1, 1A, 3 Sophia Street (collectively known as the “Subject Lands”), located on the northeast corner of Church Street East and Sophia Street, generally north of Queen Street East and west of Kennedy Road in the City of Brampton. The Subject Lands are located within the Centre Street Major Transit Station Area (“MTSA”).

We appreciate the City’s continued efforts with the MTSA Study review as well as ongoing public and stakeholder engagement. We also appreciate the opportunity to provide comments on the City’s recent release of the proposed modifications to the Brampton Plan Major Transit Station Area policies (MTSA Study Phase 2b). Further to our recent conversations with development services, we offer the following comments and suggestions regarding the proposed modifications summarized below.

Flexible Policy Framework

The City is proposing modifications to the Brampton Plan MTSA to implement building height and density policies in accordance with the provincial mandated Bill 150. The proposed modifications will allow staff to propose maximum building heights and densities and locations for unlimited height and density for MTSA’s where city council deems appropriate. We appreciate staff’s consideration to deliver on Brampton’s MTSA policy objectives in accordance with Bill 150 however we would appreciate additional clarification if the proposed policy framework would allow for flexibility to permit privately initiated OPAs to amend MTSA policies and schedules 13a-13n.

The Brampton Plan MTSA does not provide clear policy language that states where appropriate, amendments to the land schedules would be permitted or not permitted in the Official Plan. In accordance with Bill 23, through the future implementing Zoning By-law MTSA's are protected within the first year of being approved which may be an issue for lands that are suitable for higher density uses. We ask the City to consider policy language in the MTSA Study that includes permitting Official Plan Amendments to amend Schedules 13a – 13n for the purposes of re-designating lands located in the MTSA's boundaries suitable for higher density development.

Centre Street MTSA – Schedule 13d Centre Street Land Use Plan

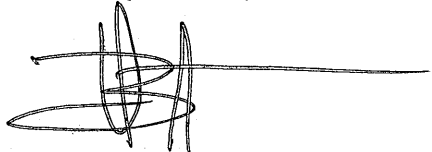
The City's recently adopted OP designates the Subject Lands as "Neighbourhood (Mid-Rise Residential)" per Schedule 13d – Centre Street Land Use Plan. The Mid-Rise Residential designation permits residential dwelling units contained within a mid-rise building ranging between 5 to 12 storeys. Currently, land uses in the MTSA do not have a maximum density restriction rather have a minimum density requirement to which the Mid-Rise Residential designation permits a minimum density of 0.50 Floor Space Index ("FSI"). The OP also designates the northern portion of the Subject Lands (abutting the designated Low-Rise Residential parcels) as a "Height Transition Area" which requires consideration for appropriate transition between higher density uses to low density uses.

Discussions between Ambria and Development Services are currently ongoing regarding precinct planning exercises for the area which includes discussions on a joint-venture development plan between Ambria and the owners to the east (55, 59, 61 Beech Street and 132, 136, 140, 142 Church Street East). Collectively, the Subject Lands along with lands to the east presents a development opportunity for a cohesive plan which will incorporate a mix of unit types.

In order to maximize the development potential with respect to the Subject Lands, we are requesting the City reconsider the Subject Land's designation from Mid-Rise Residential to High-rise Residential, similar to the designation of the adjacent lands to the east. The redesignation of the Subject Lands to High-Rise will allow for a coordinated development plan with our joint venture partners to the east to permit higher density residential uses along Church Street while providing for appropriate transitioning to the low-density residential uses to the north. Although the Subject Lands will be designated for High-Rise density, the rear portion will be limited to Mid-Rise uses (6-8 storeys) due to the provision of the Height Transition Area designation in the OP. Therefore, the opportunity for providing a mix of unit types is available for the Subject Lands.

We appreciate your consideration of the matters outlined above and look forward to working with Town staff to address our concerns. Should you have any questions or require additional information, please contact the undersigned or Marcus Martins at mmartins@ambria.ca or 416-682-5209.

Yours truly,
Ambria (Church) Limited

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal line extending to the right.

Vincent Baffa, MCIP, RPP, PLE
Vice President, Development

cc. Mayor Patrick Brown, City of Brampton
Henrik Zbogar, Director – Integrated City Planning, City of Brampton
Claudia LaRota, Principal Planner – Integrated City Planning, City of Brampton
Steve Ganesh, Commissioner – Development Services, City of Brampton
Angelo Ambrico, Manager – Development Services, City of Brampton



June 10, 2024

Michelle Gervais, MCIP, RPP
Policy Planner, City Planning & Design
City of Brampton
2 Wellington Street West
Brampton, ON
L6Y 4R2

Via email: mtsa@brampton.ca

Dear Ms. Gervais;

**RE: Major Transit Station Area Plans for Dixie and Central Park
OUR FILE 9519Y-1**

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 (outlined on the location map below). BCC is a successful regional shopping centre containing approximately 1.5M square feet of retail and office space on 33 hectares of land. It is a major activity centre, drawing people from around the city and region to shop, work and play. Over the years, the ownership has made substantial investments into the property to maintain the regionally significant class A shopping centre status that it enjoys today.



Bramalea City Centre

BCC is located within the Dixie and Central Park MTSAs which are themselves identified as being within the Queen Street East Precinct. MHBC attended the City's Major Transit Station Areas ("MTSA") open house on May 14, 2024 and has reviewed the draft precinct plans. MHBC is continuing to review and assess the implications of the draft precinct plans with Morguard and awaits the distribution of the formal plans online. However, upon our review of the draft precinct plans, we have identified significant concerns and offer the following comments:

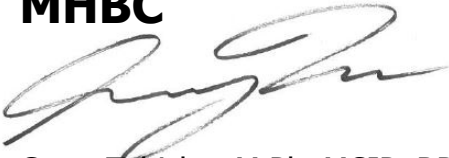
1. Maximum Building Heights and Densities – Maximum building height and density permissions should be increased throughout the BCC site, particularly closer to the Queen Street corridor and the Bramalea Bus Terminal where such density can support transit use. The permitted heights for the BCC site should be aligned with the other properties along the Dixie/Queen intersection, which are permitted heights of 40+ storeys (including numerous properties with unlimited heights). 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, and as such, additional height and density is appropriate for the site to support both the existing transit and the future transit planned for this immediate area. Further to this, please note that the existing SPA for the BCC lands (SPA-2021-0268) has received approval in principle for the development of four apartment buildings with heights ranging from 12-33 storeys. At a minimum, the height mapping should be reflective of this in-principle approval, as one of the towers is taller than what is currently being permitted in this study.
2. Density Limits – Although the City has the authority under the Planning Act to implement density restrictions within MTSAs, is an FSI cap a necessary tool if density can already be adequately controlled through building height restrictions? Inclusion of this metric adds another constraint to building and site design that could limit design creativity, which is of utmost importance in an urban intensification context. BCC is uniquely positioned as a single large landholding adjacent to two proposed major transit stations and an existing transit terminal, which have capacity to accommodate a considerable amount of height and density while being able to control and mitigate impacts internally. 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. As such, the inclusion of numerous FSI caps to control the density of the singular site is not necessary; if staff wish to proceed with FSI caps as a tool to control density, an overall density for the entire BCC property should be applied.
3. Park Location – There appears to be a large suburban-style park shown next to the Bramalea Bus Terminal. Should this park be located at the south end of the site where it can be integrated into the existing trail system? This would allow greater density to be concentrated closer to transit infrastructure where parks an open space can be provided in a more urban format through methods like privately owned publicly accessible spaces ("POPS").
4. Additional Open Space – Specific areas of parks and open spaces have been designated on the precinct plans. Is this additional park and open space area warranted given the amount of parkland existing in the surrounding area?

5. Mixed Uses – We concur with the language used in the character area descriptions which “encourages” a mix of uses and commercial uses at grade as opposed to requires them. This is an important acknowledgement of the significant existing supply of commercial uses in the area which is the context within which most of this area will develop.

We appreciate the opportunity to review the draft MTSA plans at the May open house session and we look forward to reviewing copies of the presentation materials in detail once they become publicly available. We intend to provide a more detailed comments upon such detailed review.

Yours truly,

MHBC



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

June 11, 2024

Sent via Email

Corporation of the City of Brampton
2 Wellington Street West, Brampton
ON L6Y 4R2

Attention: Michelle Gervais
Policy Planner, Integrated City Planning

**RE: May 23, 2024 Open House
MTSA Study Phase 2B
The Gore MTSA**

We are the owners of the property located at the north-east corner of Queen Street East and The Gore Road.

We attended the above-referenced Open House hosted by the City and were pleased to see “unlimited density” proposed for our property; however, we do have concerns with respect to the Proposed Height Distribution and Demonstration Plan that was presented.

Although we appreciate the City suggesting “unlimited height” within our property, we believe it is not appropriate for the City to suggest where the various heights should be located within it as is shown on the attached Proposed Height Distribution exhibit. Similarly, we believe that is not appropriate for the City to suggest the building massing as illustrated on the attached Demonstration Plan exhibit.

The building heights/massing will be determined through our zoning amendment application OZS-2024-0037.

We appreciate the City’s efforts in this process and look forward to seeing updated exhibits that are in line with our proposal.

Sincerely,

TACC HOLBORN (BLOCK 140) INC

James Stevenson
Vice-President of Planning & Development

cc. Steve Ganesh, Commissioner of Planning, Building and Growth
Lauren Capilongo
Natalie Lam
Nick Sestito