

PLANNING AND URBAN DESIGN

3 July 2024

Planning and Development Committee City of Brampton City Hall, 3rd Floor 2 Wellington Street West Brampton, ON L6Y 4R2

Dear Committee Members,

RE: 8 July 2024 Planning and Development Committee Meeting –

Item 7.1 – Staff Report re: Brampton's Major Transit Station Areas Project Update – May 2024 Open Houses and Next Steps

200 County Court Boulevard, Brampton, ON

WND File: 22.532

WND Associates has been retained by County Court Centre Ltd. as its planning consultant with respect to the submission of concurrent Official Plan Amendment, Zoning By-law Amendment, and Plan of Subdivision applications for the lands municipally known as 200 County Court Boulevard ("Subject Site"). The Subject Site is a generally rectangular-shaped lot with approximately 95 metres of frontage on Hurontario Street, 105 metres on Havelock Drive, 194 metres on County Court Boulevard, and a total area of 2.149 hectares. The Subject Site is currently designated *Mixed-Use Two* within the Hurontario-Main Corridor Secondary Plan ("HMCSP") and is zoned Service Commercial (SC) Special Section – 2651 under the City of Brampton Zoning By-law 270-2004.

After two very productive Pre-Consultation meetings with City Staff on 13 January 2023 and 8 March 2023, concurrent Zoning By-law Amendment and Plan of Subdivision applications were submitted on 16 August 2023 to facilitate the construction of five residential towers ranging in height from 22 to 44 storeys, atop podium elements which include retail and service-commercial uses at-grade (the "Proposed Development"). Formal application comments were received by City staff in January 2024, and the applicant team is currently working to address key issues and formulate a resubmission within the near future.

In addition, we have reviewed the materials related to Item 7.1, specifically Attachment C and the Proposed Density Distribution, Proposed Height Distribution, and Demonstration Plan documents related to the Ray Lawson MTSA (pages 17-21 of Attachment C). We have concerns that the proposed height and density regulations do not reflect feedback received through the application process (City File No: OZS-

2023-0028) thus far, while they inappropriately limit opportunities for transit-oriented growth. More specifically our concerns relate to the following:

- 1. Formal application comments received from Development Services & Design and Urban Design divisions request that a 45-degree angular plane analysis be provided as part of the review process. Accordingly, that analysis demonstrated that a building height up to 46-storeys safely fits within this plane. Accordingly, the 25-storey limit in the draft mapping is in our opinion arbitrary, and should be revised to facilitate up to at least 46-storeys.
- 2. The proposed height and density regulations are too modest and do not align with Provincial policies, particularly for strategic growth areas [MTSAs], that; direct municipalities to maximize the number of potential transit users that are within walking distance of the station [Policy 2.2.4.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Office Consolidation 2020)]; and promote the efficient use of existing and planned infrastructure (Policy 1.6.7.2 Provincial Policy Statement, 2020); direct municipalities to promote a land use pattern, density and mix of uses that minimize the length and number of vehicle trips and support current and future use of transit (Policy 1.6.74 Provincial Policy Statement, 2020), among others.
- 3. Formal application comments received to date, including those from the Integrated City Planning (MTSA Policy), Development Services & Design, and Urban Design divisions do not object to the proposed heights of Buildings A and E of the Proposed Development that propose heights of 34-and 39-storeys, respectively, and therefore exceed the proposed maximum height of 25-storeys for these same areas of the Subject Site.
- 4. Although the property to the south is currently occupied by 3.5-storey condominium townhouses, we strongly believe it inappropriate to limit lands within a strategic growth area (MTSA) to a maximum height of 0-4-storeys and a maximum density of 0.2 FSI. This property is approximately 120 metres from the future location of the Ray Lawson LRT stop.

Conclusion

The Subject Site is a large, underutilized property, providing a great opportunity to accommodate future transit-oriented growth. As the Subject Site is one parcel, the entirety of its area should be considered to be "at the corner" — where unlimited maximum heights and densities apply, while we hope for the City staff to honour the positive discussions made throughout the application process at the Subject Site.

We trust that you will consider our requests during the detailed policy writing and plan development stage that will comprise the future City-initiated amendments to the Secondary Plans for September 2024. Should you have any questions, please do not hesitate to contact the undersigned or Erik Retz of our office.

Yours very truly,

WND associates

planning + urban design

Andrew Ferancik, MCIP, RPP Principal