



August 30, 2024

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

**Attention: Members of Planning and Development C/O
Office of the City Clerk**

RE: Public Meeting Comments:
**Proposed Major Transit Station Area (MTSA) Official Plan Amendment
(OPA) & Precinct Plans, Hurontario LRT Secondary Plan Area 11
(Formerly Hurontario-Main Corridor Secondary Plan, Area 55)**
Agenda Items 5.1 & 7.1 Proposed Amendments to Brampton Plan,
137 Steeles Avenue West
City of Brampton, Region of Peel

Dear Madams and Sirs,

We write on behalf of our client, Avalon Developments Inc. being the Registered Owner of lands municipally addressed as 137 Steeles Avenue West ("*Subject lands*"), to provide Comments pertaining to the proposed MTSA OPA, Precinct Plans and associated Strategic Transportation and Master Stormwater Study.

The Subject Lands are located on the south side of Steeles Avenue West, west of Lancashire Lane, east of Malta Avenue, within Ward 4 and are approximately 1.91 Hectares (*4.71 Acres*) in gross Site Area.

In addition to the following Comments, our prior correspondence, received by Committee and dated April 2nd, 2024, is enclosed with this submission as **Attachment 1**.

We appreciate and welcome the opportunity to continue to participate in the process of developing appropriate and supportive Policies for MTSA's.

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Our Comments are specific to the proposed *Hurontario-Main Corridor Secondary Plan, Area 55*, and proposed Precinct Plan.

Notably, our Client **does not** support the proposed Amendment and Precinct Plan including the proposed designations, height distributions, density distributions, and various Policies, as they pertain to the Subject Lands.

We respectfully request the City to reconsider the proposed building height range and densities, recommended, revising the proposed Amendment to implement appropriate Policies, building heights and densities, to be confirmed through implementing Zoning By-laws, while revising the conceptual neighbourhood Precinct Plan to include high density buildings in stead of mid-rise buildings on the Subject Lands.

As outlined in our correspondence, the Subject Lands are planned for a Mixed-Use Development consisting of two Phases, generally consisting of four Apartment Buildings, with Podiums, ranging in heights of 45 to 50 Storeys, together with a vitally important Infrastructure, within the MTSA, including a portion of a Public Road and new Public Park.

The fist Phase of development is permissible in accordance with *Zoning By-law No. 205-2023*.

A proposed Zoning By-law Amendment application, capturing both phases of development, is currently in process, and deemed complete June 1st, 2024, per City File No. OZS-2024-0040. As agreed, upon with the City, the proposed Zoning By-law Amendment application is transitioned from *Brampton Plan*.

Despite our Client's long-standing commitment to implementing the applicable Tertiary Plan and vitally important Infrastructure within the MTSA, the proposed Amendment and Precinct Plan does not reflect the proposed development's building forms, heights, and densities. Instead, the proposed Amendment seeks to reduce building heights and density, as it would pertain to the south section or second phase of the proposed development by means of recommending building heights of 4 to 12 storeys and a maximum Floor Space Index (*FSI*) of 3.0.

The proposed Amendment and Precinct Plan undermines the ability of the Subject Lands to provide meaningful housing and associated transit ridership including Community Infrastructure to support the MTSA.

Further, as demonstrated in Figure 1 below, the proposed mid-rise buildings and massing are not compatible, in-built form, with the approved building heights in the first Phase of development, creating overlook impacts and inconsistent arrangement of building types. Similar to the north side

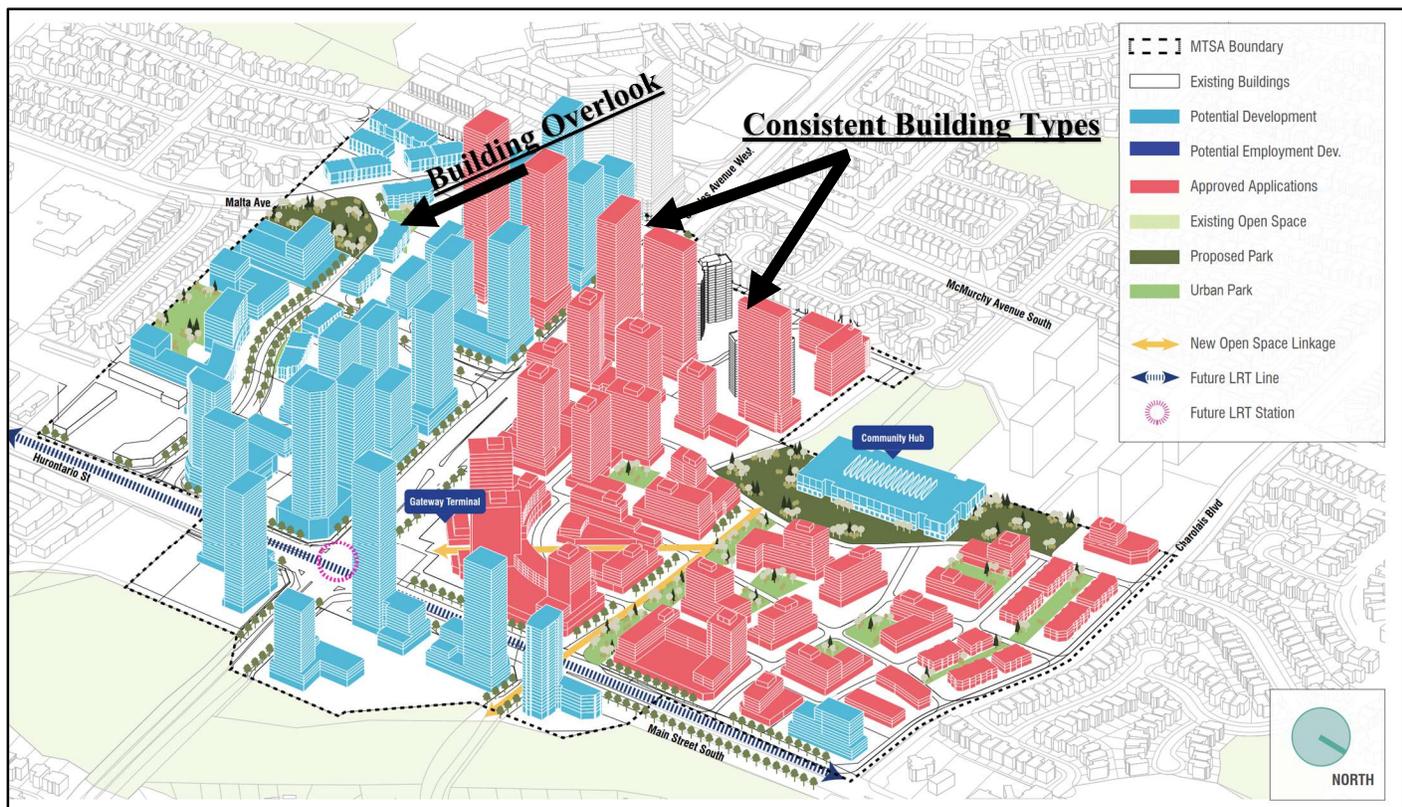
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of Steeles Avenue West, which includes High Rise-Buildings, directly across the Subject Lands, the proposed Demonstration Plan should reflect a consistent building typology for the Subject Lands being High-Rise Buildings.

The Subject Lands are one of the last remaining parcels, which are vacant and capable of accommodating intensification and vitally important road connections including a significant portion of a Public Park, within the MTSA. The Subject Lands are within immediate walking distance to a rapid transit corridor and the future Hurontario LRT meriting the highest densities within the MTSA.

Further, various proposed Policies pertaining to transportation and servicing would impede the implementation of Infrastructure. Notably, a recommended 25.2 metre Street Cross Section for Mixed-Use Neighbourhoods, recommends excessive sidewalk widths, impractical vegetated swales (*which cannot infiltrate stormwater during the winter months*) and are of insufficient width, potentially impeding the installation of as required driveway culverts.

Figure 1: Demonstration Plan



Source: City of Brampton Proposed Demonstration Plan

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The following specific Policies should be reviewed and revised to permit greater flexibility and clarity:

- i. Policy 4.2 (d): Requires a ‘minimum percentage’ of at-grade non-residential uses to be provided in ‘each building.’ While a mixed-use approach building within the MTSA should be encouraged, the noted Policy mandates the requirement within ‘each building,’ providing no flexibility or consideration of market conditions. Consideration should be given to revising the Policy to remove the word ‘shall’ and replace the same with ‘encourage.’ Alternatively, the Policy should be revised to ensure no Amendment is required to permit buildings without non-residential uses, continuing to defer specific requirements to implementing Zoning By-laws.
- ii. Policy 4.2 (f): This Policy is not appropriate nor required within the Amendment. The Policy references an unevaluated Wetland within the ‘vicinity of the Malta Avenue Extension,’ for which our Client’s lands are located. The requirement for studies prior to development is already assured through the City’s regular planning process and CVC Permit process.
- iii. Policy 5.0 (b): This Policy should be revised to make clear that already Zoned and/or Approved Buildings are not subject to the criteria listed.
- iv. Policy 5.2 (c): This Policy outlines several criteria pertaining to potential increase in building height. The Policy requires ‘all criteria’ be met which is stringent. Consideration should be given to implementing flexible language which would require Applicants to meet ‘all criteria’ as ‘appropriate or reasonable.’
- v. Policy 7.0 (c) and (d): These Policies are stringent. For example, having a minimum Right of Way of 25.2 metres within the Amendment with sidewalks on both sides is not appropriate, as its excessive and a ‘blanket’ approach, for all public local streets. Instead, the Policy should reference the noted Guidelines making it clear reduced Rights of Way, as deemed appropriate through the development application process is permissible.
- vi. Policy 7.2: The minimum width for mid-block connections should be determined through the development application process and 15 metres is not considered as ‘small scale’ or ‘pedestrian-oriented’.

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- vii. Policy 7.5 (b): This Policy prohibits above grade parking or at grade parking to front a street which may impede Accessibility or appropriate urban design to integrate parking structures. This Policy should be removed, deferring location of parking as part of the development application process and design stage.

In general, several Policies related to site design and infrastructure requirements are stringent and will impact the ability to implement appropriate design and built forms within the MTSAs. Flexible language which permits site-specific considerations should be implemented within the Amendment.

Thank you, again, for the opportunity to provide comments on the proposed Amendment and Precinct Plan.

Our office would welcome the opportunity to meet with the City to discuss our Comments and concerns.

Please notify the undersigned of any Notice of Decision.

Should you have any questions or comments, please do not hesitate to contact the undersigned.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,

BLACKTHORN DEVELOPMENT CORP.

Maurizio Rogato, B.U.R.Pl., M.C.I.P., R.P.P.

Principal

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Mr. Steve Ganesh, MCIP, RPP, Commissioner, Planning, Building, and Growth Management

Mr. Angelo Ambrico M. Pl, MCIP, RPP, Manager, Development Services