



September 6, 2024

MGP File: 15-2415 21-3064

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

via email: Steve.Ganesh@brampton.ca

Attention: Mr. Steve Ganesh

Commissioner, Planning, Building and Growth Management

Dear Mr. Ganesh:

RE: Comments on the Primary Major Transit Station Areas – City-initiated Official Plan

**Amendments** 

Bram East Secondary Plan Area 41 (The Gore MTSA)

TACC Holborn (Block 140) Inc.

Malone Given Parsons Ltd. is the Planning Consultant for TACC Holborn (Block 140) Inc. ("TACC Holborn"), who own the property located on the northeast corner of The Gore Road and Queen Street East in the City of Brampton, legally described as Block 140 on Registered Plan 43M-2092 (the "Subject Lands").

On behalf of TACC Holborn, we have reviewed the proposed Official Plan Amendment ("OPA") for the Bram East Secondary Plan Area 41 / The Gore Major Transit Station ("MTSA"). We request that revisions be made to Appendix B - The Gore MTSA Height Distribution Plan to provide clarity on the maximum building height range.

## Appendix B - The Gore MTSA Height Distribution Plan

We have compared the legend on Appendix B with previous Proposed Height Distribution graphic shown at the MTSA Open House, dated May 23, 2024. There appears to be a formatting issue with the legend, which results in the height ranges being shown out of sync from the coloured boxes. For example, the darkest red shade should correspond to the "50+ st 'unlimited height'" category but is currently shown as "Future BRT Stop".

Assuming the legend will be updated to match the previous Proposed Height Distribution, we note that there are various building footprints shown on the Subject Lands with heights ranging from 5-8 storeys to 50+ storeys (unlimited height). While the building footprints appear reflective of the ongoing applications for Official Plan and Zoning By-law Amendment for Block 140 (City File OZS-2024-0037), we note

that the proposal may change as we continue through the application process with Staff.

Policy 8.4.a) of the proposed OPA references a potential range and distribution of building heights and densities illustrated on Appendices B and C, and the maximum heights and densities within the illustrated range will be implemented through the Zoning By-law. However, it is unclear whether illustrated range applies specifically to the particular building and is also limited to the current location of towers and podiums. In our opinion, applying the range and distribution of height to the proposed building footprints and massing does not provide sufficient flexibility for the current applications to continue to evolve. As it is recognized that each individual building on this property has the potential to reach 50+ storeys (unlimited height), in our opinion, it would be preferable to show heights on a block basis, similar to how density is shown across blocks on Appendix C – The Gore MTSA Proposed Density Distribution.

## **Special Policy Area 19 (Office Node)**

We ask staff to clarify whether Special Policy Area 19 (Policy 3.2.39 of the existing Secondary Plan) will be amended to remove reference to Block 140. Based on Section 8.0 of the proposed OPA, this Special Policy Area would no longer apply to Block 140 as it is part of Sections 1.0 to 7.0 of the Secondary Plan.

## Conclusion

TACC Holborn recognizes the efforts that City staff have put into the preparation of the proposed MTSA OPAs and we welcome the opportunity to meet with City staff to discuss our comments.

Should you have any questions or wish to discuss our comments in greater detail, please contact me at (905) 513-0170 ext. 112.

Yours very truly, Malone Given Parsons Ltd.

Lauren Capilongo, MCIP, RPP

cc: TACC Holborn (Block 140) Inc.
Michelle Gervais, City of Brampton