



PLANNING AND URBAN DESIGN

3 September 2024

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

Dear Committee Members,

**RE: 9 September 2024 Planning and Development Committee
Meeting – Item 5.1 –Information Report: Primary Major Transit
Station Areas – City initiated Official Plan Amendments: Queen
Street Corridor Secondary Plan Area 36, Bram West Secondary
Plan Area 40, The Gore Secondary Plan Area 41, Mount
Pleasant Secondary Plan Area 51, and Hurontario-Main
Corridor Secondary Plan Area 55
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.

Furthermore, we have reviewed the materials related to Item 5.1, specifically Attachment 1 and Attachment 8 (City-initiated Draft Official Plan Amendment). In line with Attachment 1 and our comments within our submitted letter on the 8 July 2024 agenda (*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*), we continue to 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 1.6.7.4 – 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 is 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.

As per Attachment 1, City Staff have responded to this comment that “the existing townhouse development to the south is being shown with a maximum height of 4 storeys, because although within the MTSA boundary, it is in a condominium tenure, and the likelihood of redevelopment over the horizon of this plan is fairly low.” We strongly disagree with this rationale as we have experienced on multiple occasions within the Greater Toronto Area, condominium developments redevelop with more denser built forms to support public investment in transit. In addition, if the planning policies affecting these lands were to be amended to permit more dense built forms (ex.

mid-rise or tall building forms), the likelihood of redevelopment would greatly increase, in our opinion. Redesignating these lands to permit higher-density development would allow for a gradual transition in height and density as distance from the transit station (Ray Lawson Hurontario LRT stop) increases, in line with the Building Height and Density Section (5.2) of the Draft Official Plan Amendment for the new Hurontario LRT Secondary Plan Area 11.

In addition to the above comments that were featured in our 3 July 2024 Letter, we offer the below comments on Attachment 8 (Draft Official Plan Amendment for the new Hurontario LRT Secondary Plan Area 11):

1. Policy 4.2 c) – If the market for employment uses is unfavourable, requiring employment uses to be developed in advance of non-employment uses could delay the delivery of dwelling units, and further, the City of Brampton fulfilling their commitment to building 1.5 million new housing units by 2031 (“Municipal Housing Pledge”).
2. General Comment – In order to create flexibility and protect for a potential increased demand, we recommend adding a policy to Section 6.1 that supports or considers the creation of new parks through on-site parkland dedications (Section 42 of *Planning Act*) on lands that are not currently identified to accommodate a park or open space on Brampton Plan’s Schedules 13l and 13m or on the MTSA Potential Demonstration – Appendix B1 and B2.
3. Policy 7.1 d) i) – It is unnecessary to require a minimum width for private streets of 7.0 metres. A width of 6.0 metres has been established in other municipalities within the Greater Toronto Area, and a wider private street width could increase automobile speeds and decrease pedestrian safety, while the increased width reduces the area available for an enhanced pedestrian realm.
4. Policy 7.2 a) – Please clarify the intended minimum width of mid-block connections as “15 metres” is highlighted.

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 prior to bringing forward the Draft Official Plan Amendment for the new Hurontario LRT Secondary Plan Area 11 for Council adoption in November 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

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

Andrew Ferancik, MCIP, RPP
Principal