

October 11, 2024

**Via Electronic Submission**

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

ATTN: Mayor Patrick Brown and Members of Council

RE: Downtown Brampton Transit Hub (Bus Terminal) Preliminary Design, and Business Case Study – Comments on Transit Project Assessment Process (“TPAP”)

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Tribute (Railroad Street) Limited (“Tribute”) is the registered owner of the properties municipally known as 17-35 Railroad Street, 48-50 Mill Street North and 55-59 Elizabeth Street North (the “Lands”) in the City of Brampton (the “City”). Tribute recently acquired the Lands on June 21, 2024, but the Lands’ development potential has been subject to extensive pre-application consultation with the City and a rezoning application was filed by the prior owner on April 30, 2024 (the “Application”). The City deemed Tribute’s application complete as of August 14, 2024.

We are writing to provide comments on the City’s Downtown Transit Hub (Bus Terminal) Preliminary Design (the “Preliminary Design”) that is being considered under a TPAP in accordance with O. Reg 231/08. We are of the view that the proposed Transit Hub, inclusive of the relocation of Railroad Street, will result in significant adverse impacts to the Lands by hindering its development potential as a site that can accommodate development in a three point-tower form. These impacts have not been accurately reported and considered in the City’s Preliminary Design and Business Case Study, and request that City staff continue to consult with Tribute to identify an appropriate option.

**The Lands**

The Lands are immediately across Railroad Street from the Brampton Innovation District GO Station (the “GO Station”) and are included within the boundary of the Brampton GO Major Transit Station Area. Mill Street abuts the Lands to the west & Elizabeth Street abuts the Lands to the east.

The Lands currently consist of an assembly of vacant parcels and 1 to 2-storey detached dwellings. The City’s in-force Official Plan designates the Lands as Mixed Use and the Downtown Brampton Secondary Plan designates the Lands as Central Area Mixed Use. Both designations prioritize transit-supportive development in a compact form. The Lands are accordingly underutilized and appropriate for redevelopment in tower form.



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## **The TPAP**

Through the TPAP, the City is proposing to construct additional bus bays, layovers, charging stations, and bus loops near the GO Station. In November 2023, City staff presented a long-list of options divided into three conceptual alternatives: (1) on-street bus exchanges south of the Railway Street corridor; (2) off-street exchanges south of the Railway Street corridor; and (3) a split exchange on the north and south side of the Railway Street corridor. At the time, staff identified benefits and impacts arising from each option, but did not select a preferred design. Instead, staff stated that they would carry out additional studies and present short-listed design alternatives in a second Public Information Centre in the Spring of 2024, with a third Public Information Centre scheduled in the future to select a preferred alternative design and complete the environmental project report as required by O. Reg 231/08. It is our understanding that short-listed design alternatives have yet to be presented to the public.

As the formal TPAP is subject to stringent timelines, the TPAP Manual strongly recommends pre-planning activities with property owners within 30-metres of the transit project location. The TPAP Manual recommends that pre-consultation should canvass preferred options, complete studies, and consider objections from these property owners to minimize objections during the TPAP process. This has not occurred.

At a meeting held between Tribute and the City on July 15, 2024, staff identified that they had refined Option 2, Configuration “D” (“Option 2D”), which requires acquisition of property along the Railroad Street frontage of the Lands to protect for the continuation of Railroad Street, west of Elizabeth Street with additional bus stops. The City labelled this refined option as Option 2D – Alternative 1 and referred to it as their preferred option at the meeting. The City’s meeting minutes and Option 2D – Alternative 1 are enclosed with this letter for reference. Some redactions have been applied to protect commercially sensitive information.

A further meeting with staff was held on October 10, 2024, where staff clarified that Option 2D – Alternative 1 is an emerging option to be considered together with the other long-list options.

## **The Preliminary Design Will Result in Significant Adverse Impacts**

While Tribute understands that Option 2D – Alternative 1 is one of several long-list options, Tribute remains concerned that this option has not been adequately evaluated together with the other options to properly identify all potential adverse impacts.

Through the evaluation of the long-list options, Metrolinx’ proposed corridor expansion project to accommodate two-way all-day rail service was taken into consideration and is anticipated to encroach on Railroad Street and the 8 Nelson site (existing bus terminal). The long-list options were developed with either the full realignment, partial realignment/closure, or full closure of Railroad Street in mind. From reviewing the long-list options, closure means closure to public traffic but open to transit. The assumption that Railroad Street can remain west of Elizabeth Street, east of Mill Street makes the review of these long-list options inherently flawed.





City staff identified evaluation methodology & criteria where a key measurement of impact is whether the design option would minimize capital costs.

As shown in the development options enclosed with this letter, specifically Option 1, the Lands, with the closure of Railroad Street between Mill Street and Elizabeth Street, can accommodate three towers with standard 750m<sup>2</sup> floor plates and appropriate tower separation.

Maintaining Railroad Street as a through street, north of the Lands between Mill Street and Elizabeth Street, would require an acquisition of 17.5% of the Lands. Please see Option 2 enclosed with this letter. Option 2D – Alternative 1, with Railroad Street as a through street, north of the Lands between Mill Street and Elizabeth Street, including the bus stops, would require an acquisition of 22.8% of the Lands. Please see Option 3 enclosed with this letter.

The overlay of the proposed land takings due to maintaining Railroad Street as a through street, between Mill Street and Elizabeth Street, and Option 2D – Alternative 1 significantly constrains the Lands and results in the loss of development potential of a third tower, the reduction of approximately 28,500m<sup>2</sup> (307,200ft<sup>2</sup>) of Gross Floor Area (GFA) and the loss of 361 units. Please note that Option 2 and 3 include tower floor plates that are approximately 850m<sup>2</sup>. The towers were expanded from 750m<sup>2</sup> in Option 1 to approximately 850m<sup>2</sup> in Option 2 and 3 to try and recoup the significant loss the proposed land taking would have on the Lands. If Option 2 and 3 were designed with two 750m<sup>2</sup> towers, the loss in GFA would be approximately 36,700m<sup>2</sup> (395,000ft<sup>2</sup>), and the unit loss would be 489.

Tribute believes that Option 1 represents an appropriate development for the Lands, meeting all statutory tests under the *Planning Act* and representing good planning. While the Application attempted to mitigate this potential loss by proposing only two towers, the Application should not be understood as any acquiescence or consent to the proposed taking shown in Option 2D – Alternative 1. The impacts of these constraints cannot be overstated and must be considered in the evaluation of options.

Through our application, City staff expressly advised that additional consultation with the City, Metrolinx, and CN Rail should occur to evaluate the closure or re-alignment of Railroad Street. To date, that consultation has not occurred. Accordingly, Tribute requests that such consultation occur as part of the City's evaluation of long-list options.

### **City to Re-evaluate Long-List Options**

We propose the City evaluate the long-list options with consideration of closing Railway Street north of the Lands between Mill Street and Elizabeth Street due to the loss of the development potential of a third tower on the Lands and capital costs for the City associated with required land acquisitions.



Our Transportation consultant, Arcadis, has reviewed the potential closure of Railroad Street to the north of the Lands. Preliminary Analysis confirms the closure of Railroad Street can be achieved with improvements such as turn lanes and signalization at the intersection of Mill Street North and Nelson Street West and Elizabeth Street North and Nelson Street West. There is sufficient width at these intersections to accommodate signalization without widening.

A benefit to the closure of Railroad Street north of the Lands is the development of a pedestrian mews between our future development and the GO Station.

**Closing**

We ask the City to consider our comments on the City's Downtown Transit Hub (Bus Terminal) Preliminary Design that is being considered under a TPAP in accordance with O. Reg 231/08 and request that City staff continue to consult with Tribute to identify an appropriate option.

Regards,

**TRIBUTE (RAILROAD STREET) LIMITED**



Peter Jakovcic  
Vice President of Land Development

Cc:



DESIGN OPTIONS	OPTION 1			OPTION 2		OPTION 3	
	3 TOWERS			2 TOWERS		2 TOWERS	
	0% LAND TAKING			17.5% LAND TAKING (RAILROAD ST MAINTAINED)		22.8% LAND TAKING (TPAP OPTION 2D-Alt.1)	
	sq.m.	sq.ft.	sq.m.	sq.ft.	sq.m.	sq.ft.	
<b>NET SITE AREA</b>	<b>6,049</b>	<b>65,107</b>	<b>4,992</b>	<b>53,736</b>	<b>4,670</b>	<b>50,263</b>	
Gross Site Area	6,049	65,107	6,049	65,107	6,049	65,107	
Reductions (%)	0	0	1,056	17.5%	1,379	22.8%	
<b>TOTAL FLOOR AREA (TFA)</b>	<b>153,460</b>	<b>1,651,825</b>	<b>116,297</b>	<b>1,251,806</b>	<b>114,213</b>	<b>1,229,378</b>	
Residential	140,231	1,509,435	106,505	1,146,411	104,826	1,128,340	
Non-Residential (Retail)	620	6,674	419	4,510	350	3,767	
Parking (Above Ground)	12,608	135,716	9,372	100,884	9,037	97,271	
<b>GROSS FLOOR AREA (GFA)</b>	<b>120,388</b>	<b>1,295,845</b>	<b>93,367</b>	<b>1,004,994</b>	<b>91,848</b>	<b>988,640</b>	
Above Ground	119,893	1,290,517	92,945	1,000,452	91,426	984,097	
Underground	495	5,328	422	4,542	422	4,542	
<b>NET FSI</b>	<b>19.90</b>		<b>18.70</b>		<b>19.67</b>		
Gross FSI	19.90		15.44		15.18		
<b>NO. OF FLOORS</b>	<b>53</b>	<b>55</b>	<b>58</b>	<b>55</b>	<b>58</b>	<b>58</b>	
Tower Plate Size sq.m. (TFA)	<b>750</b>	<b>750</b>	<b>750</b>	<b>850</b>	<b>850</b>	<b>850</b>	
Buildings A - B - C	A	B	C	A	B	B	
<b>NO. OF UNITS</b>	<b>1,955</b>		<b>1,628</b>		<b>1,594</b>		
units per typical plate	11	12	11	14	14	14	
<b>PARKING PROVIDED</b>	<b>575</b>		<b>454</b>		<b>409</b>		
	Ratio	0.29	per unit	Ratio	0.28	per unit	
Provided number of floors	*3.5 levels above ground and 3 level below ground		*3.5 levels above ground and 3 level below ground		*3.5 levels above ground and 3 level below ground		

**Note 1:** "Total Floor Area" Calculated from building massing

**Note 2:** GFA By-Law Definition: "Gross Floor Area" shall mean the aggregate of the area of all floors in a building, above or below established grade, measured from the exterior of the outside walls, but excluding any parts of the building used for mechanical equipment, stairwells, elevators, or any part of the building below grade used for storage purposes. "Residential Gross Floor Area" shall mean the aggregate of the area of all the floors in a building, above or below established grade, measured between the exterior walls of the building, but excluding any porch, verandah, unfinished attic, basement or any floor area used for building maintenance or service equipment, loading area, common laundry facilities, common washroom, common children's play area, recreation area, parking of motor vehicles, or storage.

**Note 3:** Gross floor areas does not include amenity spaces

**Note 4:** Gross floor areas for options 3 are estimated with similar GFA/TFA ratio as option 2

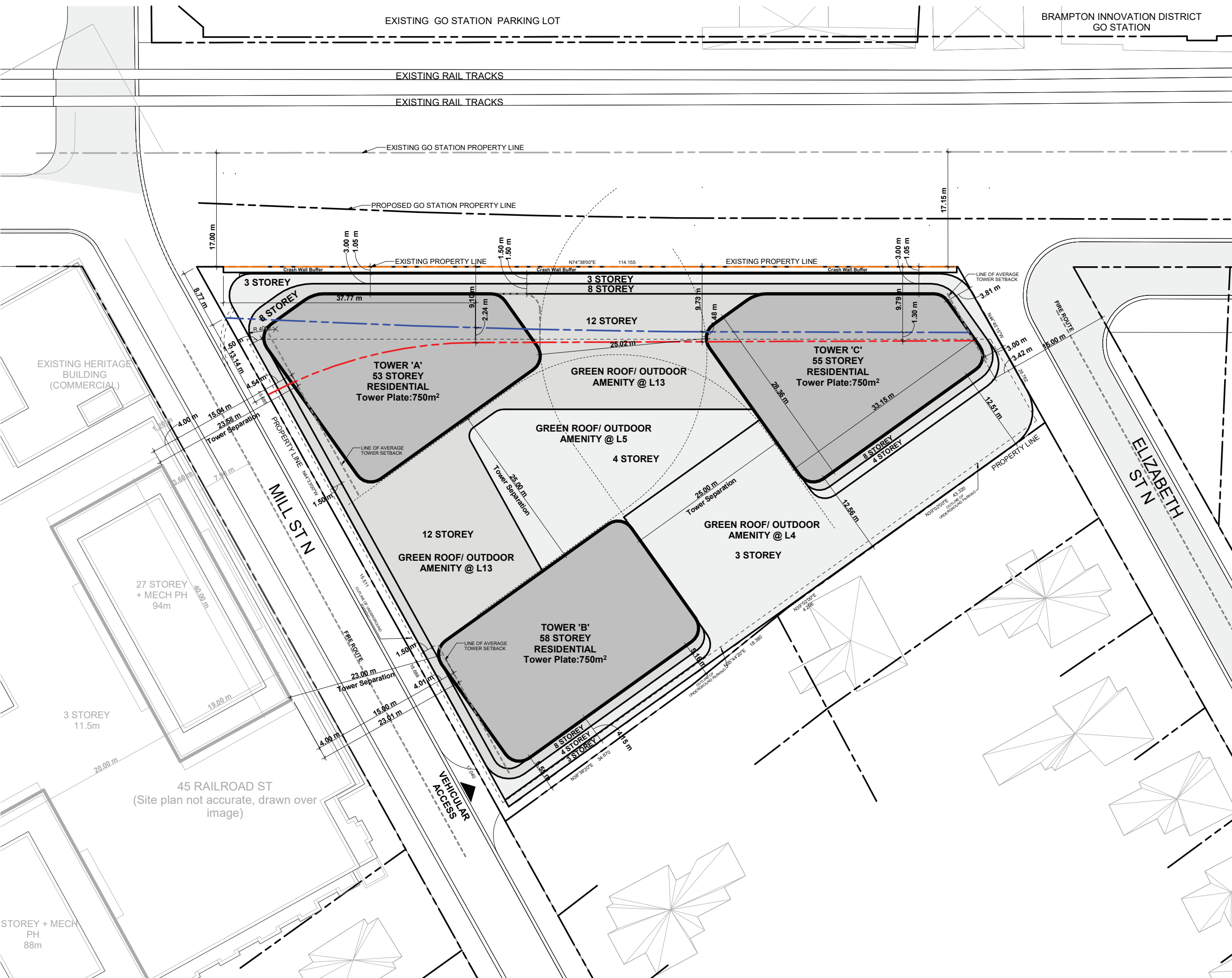
**Note 5:** Gross floor areas for options 1 are estimated from massing & high level concept plan sketches

## ALL OPTIONS STATISTICS

35 RAILROAD ST  
BRAMPTON ON.

23-007  
OCT 15, 2024





OPTION 1			
3 TOWERS			
0% LAND TAKING			
	sq.m.	sq.ft.	
NET SITE	6,049	65,107	
GROSS SITE	6,049	65,107	
REDUCTIONS	0	0	
TFA	153,460	1,651,825	
RES.	140,231	1,509,435	
NON-RES.	620	6,674	
PARKING	12,608	135,716	
GFA	120,388	1,295,845	
ABOVE	119,893	1,290,517	
U/GROUND	495	5,328	
NET FSI	19.90		
GROSS FSI	19.90		
FLOORS	53	55	58
PLATE TFA	750	750	750
	A	B	C
UNITS	1,955		
PER PLATE	11	12	11
PARKING	575		
	Ratio	0.29	per unit
	*3.5 levels above ground and 3 level below ground		

**OPTION 1 MASSING BRAKDOWN:**

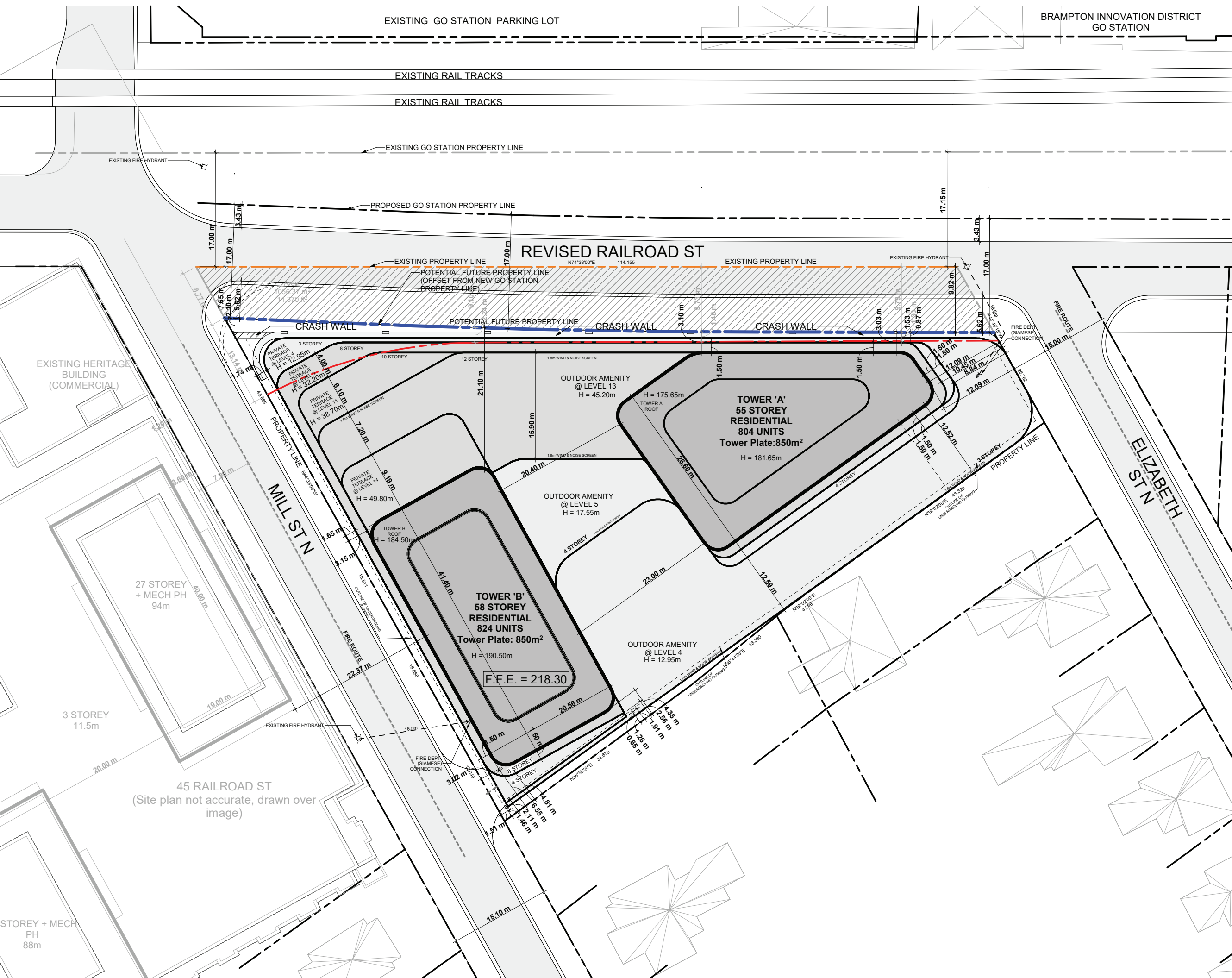
Levels P1-P3: Underground Parking  
 Level 1: Lobbies, Retail along Mill St, Parking  
 Level Mezz: Parking  
 Levels 2&3: Parking, 16 Res. Units facing Mill & Elizabeth St  
 Level 4: 42 Res. Units + Indoor & Outdoor Amenity  
 Level 5: 42 Res. Units + Indoor & Outdoor Amenity  
 Level 6-8: 3x56 Res. Units  
 Level 9-12: 4x54 Res Units  
 Levels 13: 16 Res. Units + Indoor & Outdoor Amenity  
 Levels 14 up(Typical Tower): 11+11+12 Units per Floor

**LEGEND (North Property Line)**

- 0% LAND TAKING
- 17.5% LAND TAKING (Railroad St Maintained)
- 22.8% LAND TAKING (TPAP Option 2D)

# SITE PLAN 3 TOWERS 0% LAND TAKING OPTION 1

35 RAILROAD ST  
BRAMPTON ON.



OPTION 2 2 TOWERS 17.5% LAND TAKING (RAILROAD ST MAINTAINED)			
	sq. m.		sq. ft.
NET SITE	4,992		53,736
GROSS SITE	6,049		65,107
REDUCTIONS	1,056	17.5%	11,371
TFA	116,297		1,251,806
RES.	106,505		1,146,411
NON-RES.	419		4,510
PARKING	9,372		100,884
GFA	93,367		1,004,994
ABOVE	92,945		1,000,452
U/GROUND	422		4,542
NET FSI		18.70	
GROSS FSI		15.44	
FLOORS	55		58
PLATE TFA	850		850
	A		B
UNITS PER PLATE PARKING	14	1,628	14
		454	
	Ratio	0.28	per unit
	*3.5 levels above ground and 3 level below ground		

**OPTION 2 MASSING BRAKDOWN:**

Levels P1-P3: Underground Parking  
 Level 1: Lobbies, Retail along Mill St, Parking  
 Level Mezz: Parking  
 Levels 2&3: Parking, 12 Res. Units facing Mill & Indoor Amenity facing Elizabeth St  
 Level 4: 42 Res. Units + Indoor & Outdoor Amenity  
 Level 5: 42 Res. Units + Indoor & Outdoor Amenity  
 Level 6-8: 3x45 Res. Units  
 Level 9-10: 2x43 Res Units  
 Level 11-12: 2x42 Res Units  
 Levels 13: 20 Res. Units + Indoor & Outdoor Amenity  
 Levels 14 up(Typical Tower): 14+14 Units per Floor

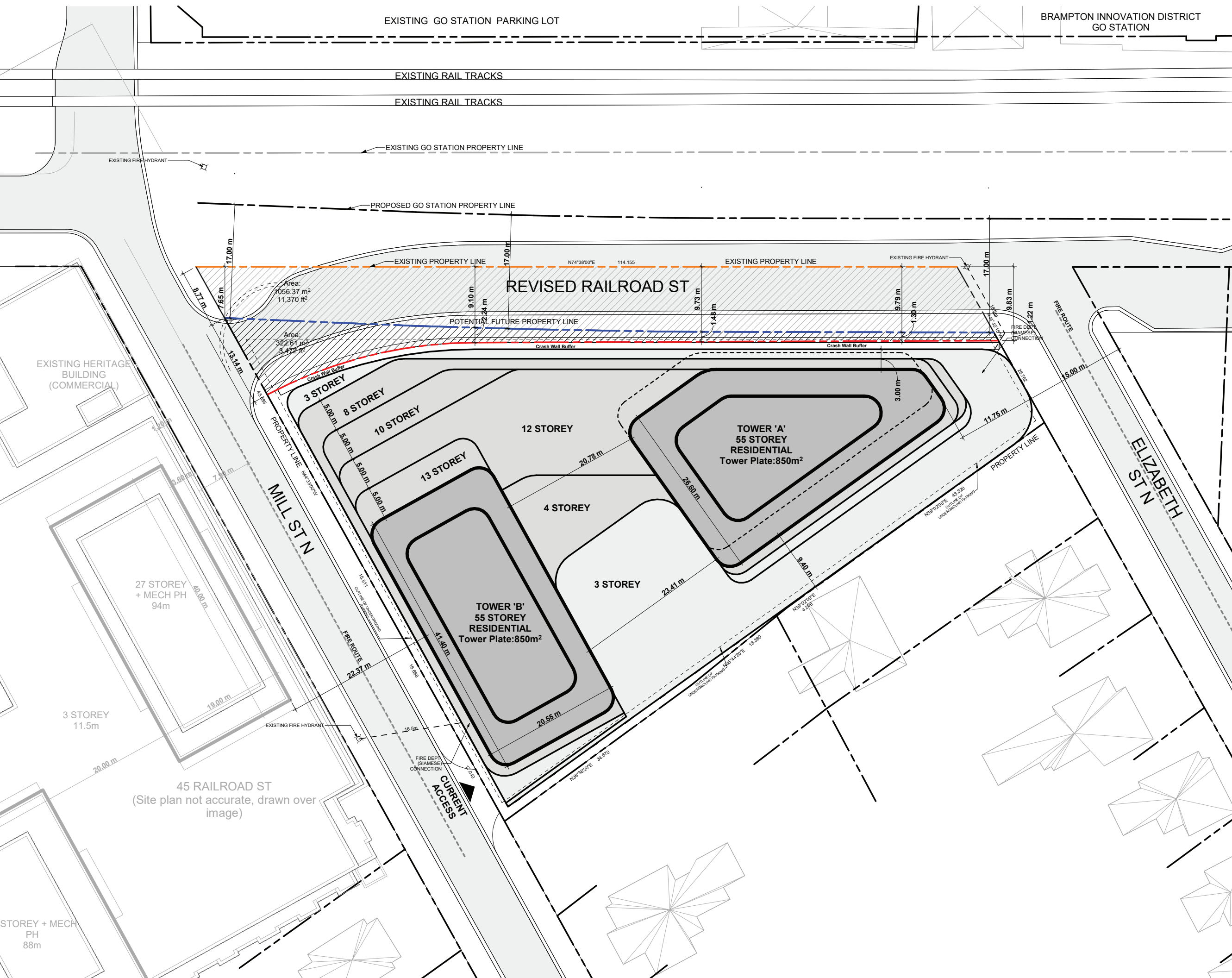
**LEGEND (North Property Line)**

- 0% LAND TAKING
- 17.5% LAND TAKING (Railroad St Maintained)
- 22.8% LAND TAKING (TPAP Option 2D)

## SITE PLAN RAILROAD ST MAINTAINED 17.5% LAND TAKING OPTION 2

35 RAILROAD ST  
BRAMPTON ON.





OPTION 3			
2 TOWERS			
22.8% LAND TAKING (TPAP OPTION 2D-Alt 1)			
	sq. m.		sq. ft.
NET SITE	4,670		50,263
GROSS SITE	6,049		65,107
REDUCTIONS	1,379	22.8%	14,843
TFA	114,213		1,229,378
RES.	104,826		1,128,340
NON-RES.	350		3,767
PARKING	9,037		97,271
GFA	91,848		988,640
ABOVE	91,426		984,097
U/GROUND	422		4,542
NET FSI	19.67		
GROSS FSI	15.18		
FLOORS	55		58
PLATE TFA	850		850
	A		B
UNITS	1,594		
PER PLATE	14		14
PARKING	409		
	Ratio	0.26	per unit
	*3.5 levels above ground and 3 level below ground		

**OPTION 3 MASSING BRAKDOWN:**

Levels P1-P3: Underground Parking  
 Level 1: Lobbies, Retail along Mill St, Parking  
 Level Mezz: Parking  
 Levels 2&3: Parking, 11 Res. Units facing Mill & Indoor Amenity facing Elizabeth St  
 Level 4: 20 Res. Units + Indoor & Outdoor Amenity  
 Level 5: 37 Res. Units + Indoor & Outdoor Amenity  
 Level 6-8: 3x41 Res. Units  
 Level 9-10: 2x39 Res Units  
 Level 11-12: 2x38 Res Units  
 Levels 13: 20 Res. Units + Indoor & Outdoor Amenity  
 Levels 14 up(Typical Tower): 14+14 Units per Floor

**LEGEND (North Property Line)**

- 0% LAND TAKING
- 17.5% LAND TAKING (Railroad St Maintained)
- 22.8% LAND TAKING (TPAP Option 2D)

**SITE PLAN  
 TPAP OPTION 2D - ALT1  
 22.8% LAND TAKING  
 OPTION 3**

**35 RAILROAD ST  
 BRAMPTON ON.**





# Meeting Minutes

Project: Downtown Brampton Transit Hub (Bus Terminal), Transit Project Assessment Process (TPAP) and Supporting Studies (DBTH)

Subject: 35 Railroad Street Developer Meeting

Date: Monday, July 15, 2024

Location: Microsoft Teams

Attendees: **City of Brampton (CoB):**  
Compton Bobb – City Project Manager (acting)  
Doug Rieger  
Arjun Singh  
Angelo Ambrico

**DBTH Consultant Team:**  
Andrew Shea (HDR) – Project Manager  
Adrian Sin (HDR) – Deputy Project Manager

**Developer:**  
Anish Panday  
Arash Ershad  
Adrienne Lee  
Andrae Griffith  
Peter Jakovcic  
Thomas Kilpatrick  
Ezra Rosenzweig  
Josh Rosenzweig  
Andrew Walker  
Michael Gagnon  
Clifford Korman

The presentation slides shared at the meeting are included as **Attachment 1**.

No.	Item
1	<p><b>Discussion</b></p> <p>Clifford Korman inquired about the additional distance south of the existing Railroad Street ROW required.</p> <ul style="list-style-type: none"> <li>HDR responded that it would be approximately 11 m, but exact dimensions are to be confirmed.</li> </ul> <p>Clifford Korman inquired about the crash wall with passengers loading and unloading from the buses.</p> <ul style="list-style-type: none"> <li>HDR responded that based on precedents at GO stations, a crash wall is not required for bus platforms.</li> </ul> <p>Adrienne Lee inquired about the requirement for the proposed Railroad/Mill Street crossing 30 m offset from the existing CN / Mill Street crossing.</p> <ul style="list-style-type: none"> <li>HDR responded that it is a Transport Canada/CN requirement.</li> </ul> <p>Clifford Korman inquired about how buses would turn left from Mill Street onto Railroad Street given the short distance.</p> <ul style="list-style-type: none"> <li>CoB confirmed that current plans only have one route that continues west of Railroad Street.</li> <li>Michael Gagnon stated that this intersection would not be ideal for general traffic needing to turn onto Railroad Street either.</li> </ul> <p>[Redacted]</p> <ul style="list-style-type: none"> <li>[Redacted]</li> </ul>



No.	Item
	<p>CoB inquired about the offset from the existing proposed crash wall.</p> <ul style="list-style-type: none"><li>HDR responds that it is about 1.5 m except for the approach to Mill Street. HDR cautioned that this will be going through preliminary design in the coming months to flesh out utility relocation space requirements and that it is subject to change.</li></ul> <p>Peter Jakovcic inquired about the Downtown Brampton Transit Hub project inception.</p> <ul style="list-style-type: none"><li>CoB responded that the hub had been in the works since 2019 on a staff level.</li></ul> <p>Peter Jakovcic inquired about whether this number of bays and laybys are necessary, if two-way flow on Railroad Street was required and if it could become a pedestrian mews.</p> <ul style="list-style-type: none"><li>CoB stated that a long development process has already reduced bus bay requirements and the City has determined that the remaining bays are needed for the long term, including protection for bays on Railroad Street.</li></ul> <p>Peter Jakovcic inquired about whether Denison Street extension would be intended as a public ROW.</p> <ul style="list-style-type: none"><li>CoB stated that the City is protecting for it, but the focus of transit hub team is the transit hub.</li></ul> <p>Peter Jakovcic urged dialogue with MX to determine the future status of the Mill Street crossing.</p> <ul style="list-style-type: none"><li>CoB confirmed there is an open communication channel with MX.</li></ul> <p>Peter Jakovcic inquired about the possibility of specific design standards for this segment of railroad street (Elizabeth to Mill).</p> <ul style="list-style-type: none"><li>CoB responded that they would be open to discussing with other internal city departments (planning and public works) the need for specific design standards for this section of railroad street.</li></ul> <p>Thomas Kilpatrick inquired about the dashed line through the proposed property.</p> <ul style="list-style-type: none"><li>HDR responded that it represents the 30 m setback from the new track.</li></ul> <p>Adrienne Lee inquired about the specifications at the Mill Street intersection and potential daylight triangle requirements.</p> <ul style="list-style-type: none"><li>HDR responded that detailed traffic and lighting analysis have not been completed yet.</li></ul> <p>Michael Gagnon inquired about parcel 2 on the key plan.</p> <ul style="list-style-type: none"><li>HDR responded that it is currently the MX park and ride lot with a vision for proposed development.</li></ul> <p>Michael Gagnon inquired about any discussion of bringing Denison Street extension through parcel 2 to avoid a staggered intersection at Elizabeth Street.</p> <ul style="list-style-type: none"><li>HDR responded that no specific link between Elizabeth Street and George Street was considered.</li></ul>





No.	Item
	<p>Josh Rosenzweig inquired about the timeline for comprehensive drawings from MX with all information compiled.</p> <ul style="list-style-type: none"><li>• CoB responded that there are currently no timelines, but are continuing to push for it as a priority item.</li></ul> <p>Ezra Rosenzweig stated that this is the first time they are seeing this preferred option and asked when this option became the preferred option.</p> <ul style="list-style-type: none"><li>• CoB responded that the project is a work in progress and the long-list options were shared publicly in November 2023. Over the past 7 months, the option has been narrowed down as the preferred alternative.</li></ul> <p>Peter Jakovcic and Clifford Korman expressed a desire to have the preferred option looked at holistically over the broader transportation network in the area.</p> <p>Clifford Korman requested CAD drawings with an approximate scale recognizing that the project design is a work in progress.</p> <ul style="list-style-type: none"><li>• CoB agreed to share CAD files for the preferred transit hub option shared recognizing that the material is work in progress and subject to change.</li></ul>

Please contact Andrew Shea at [andrew.shea@hdrinc.com](mailto:andrew.shea@hdrinc.com) if you have any questions or comments.

If there are any errors or omissions, please advise Adrian Sin at [adrian.sin@hdrinc.com](mailto:adrian.sin@hdrinc.com) within ten business days of the issuance of these minutes. Minutes prepared by Adrian Sin.

Downtown Brampton Transit Hub  
(Bus Terminal)

# TPAP, Preliminary Design, and Business Case Study

35 Railroad Street

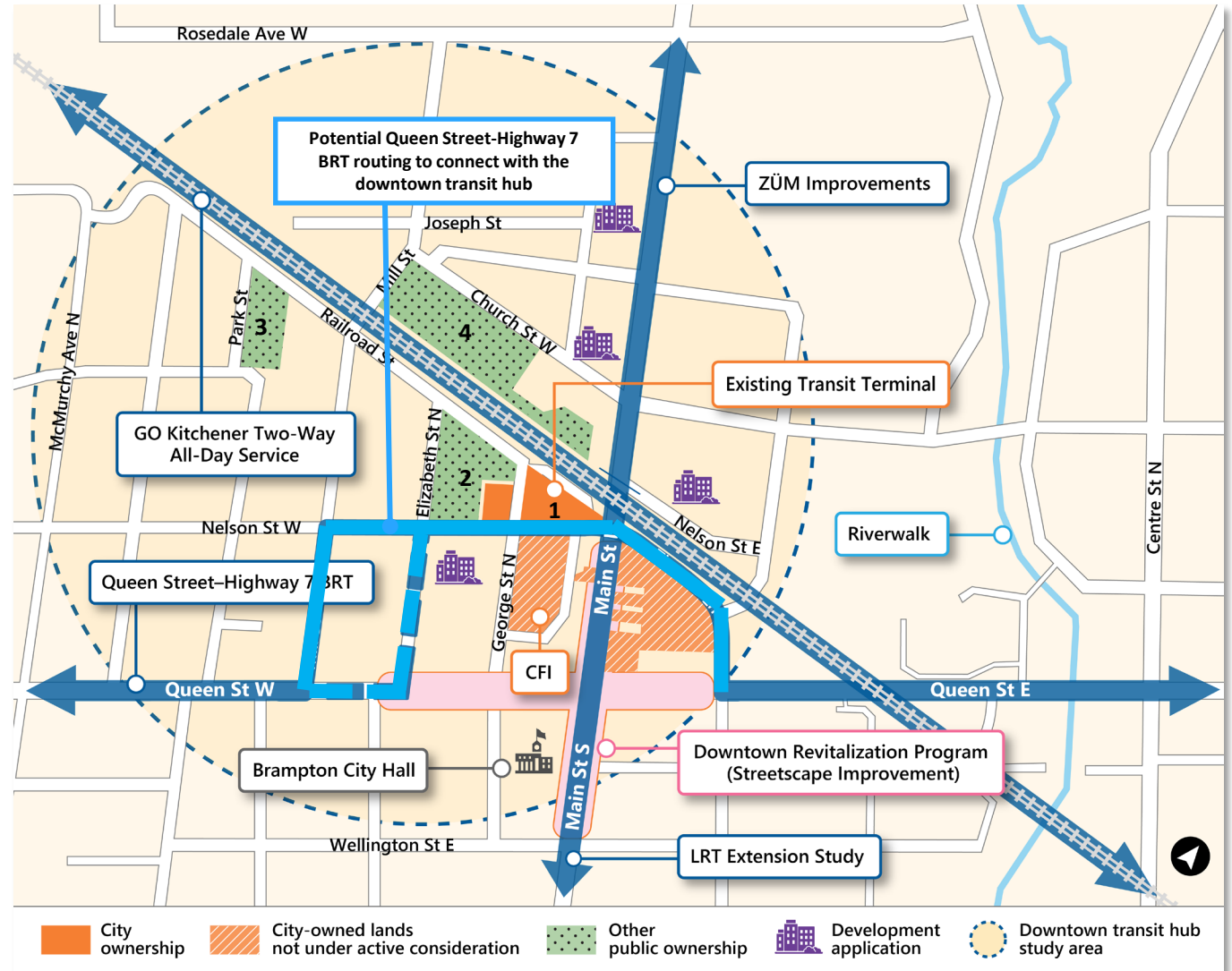
July 15<sup>th</sup>, 2024





# Study Area

- ❖ Potential Sites for Transit Hub
  1. 8 Nelson Street
  2. Elizabeth / George Block
  3. Park Street
  4. Brampton GO Station
- ❖ Preliminary screening of sites indicated that Sites 1, 2, and 4 offer sufficient size to accommodate the transit hub.
- ❖ Site 3 is too small to accommodate program requirements, is disconnected from the GO Rail and proposed LRT station, and has fewer access/egress routes
- ❖ As such, the long-list of transit hub options was developed focusing on Sites 1, 2, and 4 as they are most feasible



# Option 2D – Alternative 1

- ❖ 2 on-street bus stops eliminated
- ❖ 3-bay bus loop on 8 Nelson Street
- ❖ 8 bays along Railroad Street alignment
- ❖ 3 layover/charging bays
- ❖ Multiple accesses on Nelson Street; fractured frontage and pedestrian realm
- ❖ Accommodates Innovation Corridor

