

APPENDIX 8

DETAILED PLANNING ANALYSIS CITY FILE NUMBERS: OZS-2021-0012

The Planning Act, Provincial Policy Statement (PPS), The Growth Plan for the Greater Golden Horseshoe (Growth Plan), the Regional Official Plan, the City's Official Plan and the Mount Pleasant Secondary Plan (Area 51) provide direction and policies that encourage the development of a transit-oriented community that promotes environmental sustainability, superior community design, and the protection of the natural heritage system. These documents support land use planning in a logical, well-designed manner that supports sustainable long term economic viability.

Planning Act

The application is in compliance with matters of provincial interest as identified in the Planning Act R.S.O 1990 in terms of the following:

- the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems (section 2 f);
- the orderly development of safe and healthy communities (section 2 h);
- the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies (section 2 h.1);
- the adequate provision of a full range of housing, including affordable housing (section 2 j);
- the protection of public health and safety (section 2 o);
- the appropriate location of growth and development (section 2 p);
- the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians (section 2 q); and,
- the promotion of built-form that is well-designed, encourages a sense of place and provides for high quality public spaces (section 2 r).

These sections of the Planning Act are guiding principles included in the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe. These will be described in the relevant sections below.

Provincial Policy Statement (2020)

The Provincial Policy Statement sets out fundamental planning principles and provides policy direction on matters of provincial interest related to land use planning and development. This application is consistent with matters of Provincial Interest as identified in the Provincial Policy Statement:

- promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term (section 1.1.1 a);
- accommodating an appropriate affordable and market-based range and mix of residential types (including single detached, additional residential units, multi-housing housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs (section 1.1.1 b);
- avoiding development and land use patterns which may cause environmental or public health and safety concerns (section 1.1.1 c);
- avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas (section 1.1.1 d);
- promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (section 1.1.1 e);
- improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society (section 1.1.1 f);
- ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs (section 1.1.1 g);
- preparing for the regional and local impacts of a changing climate (section 1.1.1 i);
- *Settlement areas* shall be the focus of growth (section 1.1.3.1);
- land use patterns within settlement areas shall be based on densities and a mix of land uses which (section 1.1.3.2 a to f):
 - efficiently use land and resources;

- are appropriate for, and effectively use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
- minimize negative impacts to air quality and climate change, and promote energy efficiency;
- prepare for the impacts of a changing climate;
- support active transportation;
- are transit-supportive, where transit is planned, exists or may be developed;
- new development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities (section 1.1.3.6);
- planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by (section 1.4.3 b, c, d):
 - permitting and facilitating:
 - all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and,
 - all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;
 - directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;
 - promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;
- healthy, active communities should be promoted by (section 1.5.1 a, b):
 - planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;

- planning and providing for a full range and equitable distribution of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;
- A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation (section 1.6.7.4);

The subject lands are located within a settlement area that is defined in provincial and municipal planning documents. The subject site is designated “Low/Medium Density Residential” and “Medium Density Residential” in the Mount Pleasant Secondary Plan which permits a range of residential uses including single and semi-detached, townhouses and apartments. The proposed development will utilize the existing infrastructure capacity that will service this development. This development will occur in an orderly manner as the lands to the north of this development are already developed as low density residential uses and there is an active application for the lands to south to be developed for high density development. As such, this development will provide appropriate transition from high density to low density uses. This development will have a compact built form which will allow for the efficient use of land, infrastructure and public service facilities. As well, it will utilize the existing transit infrastructure on Veterans Drive as well as support active transportation by connecting to the existing sidewalk network.

Based on the foregoing, the proposed development satisfies Sections 1.1.1 a), d), e), f) g), 1.1.3.1, 1.1.3.2 a), b), e), f), 1.1.3.6, 1.4.3 c), d), and 1.6.7.4 of the Provincial Policy Statement.

There are no expected environmental or public health concerns associated with this proposal. The proposed development has been designed to ensure that there are no risks to public health and safety through the architectural and landscape design elements as approved in the form of an Urban Design Guidelines document specific to this site. Through the detailed design stage, the design of the site will be further refined, and staff will ensure that Crime Prevention through Environmental Design (CEPTD) principles are incorporated into the site design. This satisfies 1.1.1 c), and 1.5.1 a), b) of the Provincial Policy Statement.

The applicant submitted a Sustainability Score and Summary with the application that meets the City’s minimum “Bronze” threshold. The various proposed materials and features will contribute towards reducing the impact of new development on a local level. This satisfies Section 1.1.1 i) and 1.1.3.2 c), d) of the Provincial Policy Statement.

The proposed housing types include a range of townhouses such as standard townhouses, back-to-back townhouses and dual-frontage townhouses. The proposed unit mix contributes to the provision of a range of housing types to offer diverse housing options to future residents. As well, the proposed range of dwelling types can

accommodate a range of household sizes, ages and incomes. This satisfies sections 1.1.1 b) and 1.4.3 b) of the Provincial Policy Statement.

Based on the above, staff is satisfied that the proposed development is consistent with the policies of the Provincial Policy Statement.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)

The Growth Plan for the Greater Golden Horseshoe provides a framework for building stronger, prosperous communities by managing growth over the long term. Guiding principles include supporting complete communities, providing a mix of housing, and prioritizing intensification. This application demonstrates conformity to the following sections of the Growth Plan:

- the vast majority of growth will be directed to *settlement areas* that (section 2.2.1.2 a ii to iii):
 - have existing or planned *municipal water and waste water systems*; and
 - can support the achievement of *complete communities*;
- Applying the policies of this Plan to support the achievement of *complete communities* that (section 2.2.1.4 a to g):
 - Feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services and *public service facilities*;
 - Improve social equity and overall quality of life, including human health, for people of all ages, abilities, incomes;
 - Provide a diverse range and mix of housing options, including additional residential units and *affordable* housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;
 - Expand convenient access to:
 - A range of transportation options, including options for the safe, comfortable and convenient use of *active transportation*;
 - *Public service facilities*, co-located and integrated in community hubs;
 - an appropriate supply of safe, publicly-accessible open spaces, parks, trails, and other recreational facilities; and,

- healthy, local, and affordable food options, including through urban agriculture;
 - provide for a more *compact built form* and a vibrant *public realm*, including public open spaces;
 - mitigate and adapt to the *impacts of a changing climate*, improve resilience and reduce greenhouse gas emissions, and contribute to environmental sustainability; and,
 - integrate *green infrastructure* and appropriate *low impact development*.
- To support the achievement of *complete communities*, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes (section 2.2.6.3);
- New *development* taking place in *designated greenfield areas* will be planned, designated, zoned and designed in a manner that (section 2.2.7.1 a to c):
 - Supports the achievement of *complete communities*;
 - Supports *active transportation*; and,
 - Encourages the integration and sustained viability of transit services;
- The minimum density target applicable to the designated greenfield area of each upper- and single-tier municipality is as follows (section 2.2.7.2 a):
 - The Cities of Barrie, Brantford, Guelph, Hamilton, Orillia and Peterborough and the Regions of Durham, Halton, Niagara, Peel, Waterloo and York will plan to achieve within the horizon of this Plan a minimum density target that is not less than 50 residents and jobs combined per hectare.

This property is located within a settlement area that is defined in provincial and municipal planning documents. The development is taking place within a designated greenfield area that has access to existing transit network as well as municipal water and wastewater systems. This satisfies Section 2.2.1.2 (a ii) of the Growth Plan.

The proposed development will add to the diverse mix of residential land uses by providing a range of standard, back-to-back and dual-frontage townhouse units. These townhouses will accommodate a diverse range of household sizes, ages, and incomes. There will be access to existing transit network via Veterans Drive as well as access to the pedestrian sidewalk network. Additionally, pedestrian connections to the amenities will be provided. Existing public parks in the area will provide amenity area for this development. This satisfies Sections 2.2.1.2 (a iii), 2.2.1.4 (a) to (e), and 2.2.7.1 (a) to (c) of the Growth Plan.

The proposed density exceeds the minimum target by providing a density of approximately 277 residents per gross hectare, as calculated using the 3.6 persons per unit assumptions for townhouses in Brampton from Peel's 2015 Development Charges Background Study. This satisfies Section 2.2.7.2 (a) of the Growth Plan.

Based on the above, staff is satisfied that the proposed development conforms to the Growth Plan for the Greater Golden Horseshoe.

Region of Peel Official Plan

The Region of Peel Official Plan provides a policy framework that facilitates decisions with respect to land use matters. It is intended to guide how the Region will grow and develop while protecting the environment, managing resources and provides a basis for efficiently managing growth.

The subject application is within the "Urban System" and "North West Brampton Urban Development Area" designation on Schedule D, and "Designated Greenfield Area" on Schedule D4 as established in the Regional official Plan. This application conforms to the following policies of the Region of Peel Official Plan:

- direct urban development and redevelopment to the Urban System within the 2031 Regional Urban Boundary, as shown on Schedule D, consistent with the policies in this Plan and the area municipal official plans (Section 5.3.2.2);
- plan for the provision and financing of Regional facilities and services so as to efficiently use existing services and infrastructure, and encourage a pattern of compact forms of urban development and redevelopment (section 5.3.2.3);
- Require development and redevelopment in the Urban System to proceed according to the growth management and phasing policies of this plan, and the planned provision of necessary services (section 5.3.2.4);
- direct the area municipalities, while taking into account the characteristics of existing communities, to include policies in their official plans that (section 5.3.2.6 a, b, d):
 - support the Urban System objectives and policies in this Plan;
 - support pedestrian-friendly and transit-supportive urban development;
 - support the design of communities to minimize crime by the use of such approaches as Crime Prevention Through Environmental Design (CPTED) principles;
- The policies of the Growth Plan apply to the Northwest Brampton Urban Development Area subject to O.Reg. 311/07 as amended by O.Reg. 324/06. It is the policy of Regional Council to ensure that the applicable requirements of the

Growth Plan are met in the planning and development of Northwest Brampton (section 5.3.4.2.1);

- In addition to the policies in this Plan that govern the Region's Urban System, it is the policy of Regional Council to require the City of Brampton to ensure that its Official Plan, including all amendments and secondary plans, adhere to the following policies (section 5.3.4.2.2 e):
 - Maximize the opportunity afforded by the Mount Pleasant GO station to provide significant transit service and the development of transit-supportive land uses and densities;
- Direct the area municipalities to incorporate official plan policies to develop complete communities that are compact, well-designed, transit-oriented, offer transportation choices, include a diverse mix of land uses, accommodate people at all stages of life and have an appropriate mix of housing, a good range of jobs, high quality public open space and easy access to retail and services (section 5.5.2.1);
- Develop compact, transit supportive communities in designated greenfield areas (section 5.5.2.2);
- Plan to achieve a minimum greenfield density target of 50 people and jobs combined per hectare by 2031, to be measured over Peel's designated greenfield area excluding major environmental features as defined by the Growth Plan (section 5.5.4.2.1);
- Development within the designated greenfield areas shall be designed to meet or exceed the following minimum densities (section 5.5.4.2.2):
 - City of Brampton: 51 residents and jobs combined per hectare;
- encourage and support the efforts by the area municipalities to plan for a range of densities and forms of housing affordable to all households, including low and moderate income households, enabling all Peel residents to remain in their communities (section 5.8.2.3);
- encourage the area municipalities to promote land uses which foster and support the use of active transportation (section 5.9.10.2.4).

The proposed development is located within the Regional Urban Boundary. The proposal will efficiently utilize the existing services and infrastructure for servicing, waste water and transit systems. Staff is satisfied that the site design will have a compact built form while providing access to transit and opportunities for active transportation through the existing sidewalk network. Existing public parks in the neighbourhood will provide the amenity space for future residents. The site design will be further refined at the

detailed design stage. Principles of Crime Prevention through Environmental Design will be incorporated to ensure a safe and comfortable public realm. As such, the proposed Zoning By-law conforms to Sections 5.3.2.2, 5.3.2.3, 5.3.2.4, 5.3.2.6, 5.5.2.1, and 5.5.2.2 of the Region of Peel Official Plan.

As per the Regional Official Plan policies pertaining to the North West Brampton Urban Development area, the site conforms to the policies of the Growth Plan as well as provides a transit-supportive development. The proposed townhouses will offer and accommodate a diverse range of households, age groups and incomes. The development will provide a density of approximately 277 residents per gross hectare, as calculated using the 3.6 persons per unit assumptions for townhouses in Brampton from Peel's 2015 Development Charges Background Study. The proposed development conforms to Sections 5.3.4.2.1, 5.3.4.2.2, 5.5.4.2.1, 5.5.4.2.2, and 5.8.2.3 of the Region of Peel Official Plan.

Based on the above, staff is satisfied that the proposed development conforms to the Region of Peel Official Plan.

City of Brampton Official Plan

The City of Brampton Official Plan provides comprehensive policies that facilitate land use decision making. The purpose of the plan is to guide development and infrastructure decisions and set the basis for addressing the challenges of growth in Brampton. The Plan incorporates upper level planning policies of the PPS, the Growth Plan and the Region of Peel Official Plan.

The property is designated "Residential" on Schedule A – General Land Use Designations; "Designated Greenfield Area" on Schedule 1 – City Concept; and "Private Commercial Recreation" on Schedule E – Major Recreational Open Space of the City of Brampton Official Plan.

The "Residential" designation permits a broad range of housing, ranging from assisted housing to upscale executive housing types. The "Designated Greenfield Areas" are lands that will contribute to the creation of complete communities by providing a diverse mix of land uses and creating an urban form that supports walking, cycling and transit.

The following Official Plan policies are applicable to this application:

- Sustainable Planning Framework (section 3.1)
 - Complete communities that are compact, transit-oriented and pedestrian-friendly with a mix of uses and a variety of housing choices, employment and supporting services and facilities;
 - Fostering vibrant residential neighbourhoods that provide a variety of housing options for people at various stages of their life cycle;

- Residential

Direct at least 26,500 new dwelling units, between 2006 and 2031, to the built up area, with a focus on higher intensity in the Central Area, the Urban Growth Centre, intensification corridors, mobility hubs and major transit station areas;

Provide for a range of housing opportunities in terms of dwelling types, densities, tenure and cost to meet the diverse needs of people from various social, cultural and economic background including persons with disabilities;

Develop healthy, sustainable complete communities that are compact, transit-oriented and pedestrian-friendly with a mix of uses and a variety of housing choices, employment, and supporting services and facilities;

- Natural Heritage and Environmental Management

Identify, protect, and restore or where possible, enhance natural ecosystem features, functions and linkages;

- Recreational Open Spaces

Provide sufficient open space to meet the needs of residents of all ages and abilities and from different social, economic and cultural backgrounds;

Provide an integrated recreational open space and natural heritage system for active and passive recreational and leisure pursuits as well as functional uses including walking, cycling and access to public transit;

- Urban Design

Achieve and sustain a physical environment that is attractive, safe, functional efficient, sensitive to the City's evolving character, environmentally responsible and that instills a sense of civic pride.

- Brampton's Designated Greenfield Area forms part of the Region of Peel's Designated Greenfield Area which is planned to achieve a density of 50 residents and jobs combined per hectare by 2031. Brampton shall contribute to this target by planning to achieve a density of 51 persons and jobs per hectare over its Designated Greenfield Area by 2031, in accordance with the Growth Plan policies for measuring density (section 3.2.2.2);
- Residential development in areas outside of the Central Area, including the Urban Growth Centre, Mobility Hubs; Major Transit Station Areas or intensification corridors shall generally be limited to 50 units per net hectare. Furthermore, residential and non-

residential development outside of these areas shall generally be limited to 4 stories in height (section 3.2.8.3);

- Where the City has deemed that the City Structure would not be compromised, as required by Section 3.2.4, development outside of the Central Area, including the Urban Growth Centres; Mobility Hubs; Major Transit Station Areas or intensification corridors which is seeking to exceed the limits established in Section 3.2.8.3 and 3.2.8.4 may only be considered subject to the submission of an amendment to this Plan. This amendment is required to demonstrate the following (section 3.2.8.5 i to viii, xi to xii):
 - The development is consistent with the general intent and vision of the applicable Secondary Plan;
 - The development contributes to the City's desired housing mix;
 - There is a need for the development to meet the population and employment forecasts set out in Section 2 of this Plan;
 - The development forms part of an existing or planned Complete Community with convenient access to uses which serve the day to-day needs of residents such as commercial, recreational and institutional uses;
 - There is sufficient existing or planned infrastructure to accommodate the development;
 - The development has vehicular access to an Arterial, Minor Arterial, or Collector Road;
 - The development is in close proximity to existing or planned higher order transit and maintains or improves pedestrian, bicycle and vehicular access;
 - The form of development is compatible and integrates with adjacent land use and planned land use, including lot size, configuration, frontages, height, massing, architecture, streetscapes, heritage features, setbacks, privacy, shadowing, the pedestrian environment and parking;
 - The development maintains transition in built form through appropriate height, massing, character, architectural design, siting, setbacks, parking and open and amenity space;
 - Where possible, the development incorporates sustainable technologies and concepts of low impact development, including measures to mitigate the impacts of the development. This should include the submission of a storm water management plan acceptable to the City and Conservation Authority, which identifies the required storm drainage system and potential impacts on downstream watercourses;

- The policies of this Plan shall prescribe a range of housing accommodation in terms of dwelling type, through appropriate housing mix and density policies. Such housing mix and density policies in Secondary Plans shall reference the Residential Density Categories set out in the tables below and also set out in the “Residential Areas and Density Categories” definitions contained in Section 5 of this Plan (section 4.2.1.2);
- The City shall, in approving new residential developments, take into consideration an appropriate mixture of housing for a range of household incomes, according to substantiated need and demand for the City, as appropriate (section 4.2.1.3);
- In accordance with the Development Design Guidelines, the City recognizes that the key elements of design for residential areas are (section 4.2.1.14 i to vii):
 - Variety of housing types and architectural styles;
 - Siting and building setbacks;
 - Garage placement and driveway design including attached garages, lot widths related to attached garages, rear yard garage locations and driveways;
 - Street façade development and allowable projections, including the street address, entrance architecture, grade relationship, windows, projecting elements and roof forms;
 - Upgraded elevations at focal locations including corner lots, housing abutting open space and pedestrian links, housing at “T” intersections, and housing at parkettes;
 - Incorporation of multiple unit dwellings and apartments; and,
 - Landscaping and fencing on private property;
- Brampton shall contribute to the achievement of the Region’s intensification targets as set out in Section 3.2.2.1 by planning to accommodate at least 26,500 residential units between 2006 and 2031 within the built-up area (section 4.2.1.6);
- Residential development proposals and complementary uses, including schools, shall be evaluated in accordance with the Development Design Guidelines and Urban Design section of this Plan (section 4.2.7.1);
- The City shall encourage the use of the City of Brampton Accessibility Technical Standards in the design of public and private residential development to promote universal accessibility (section 4.2.7.3);
- Development proposals shall conform to the City of Brampton’s standard requirements for right-of-way design. Operational and maintenance implications and costs must be identified and mitigated as part of a comprehensive block plan process. The City may accept reduced right-of-way proposals that will be reviewed on a site-specific basis provided that it is demonstrated that the proposed design standards are desirable and in keeping with the City’s overall design objectives for the relevant community and mitigate any impact resulting from the reduced right-of-way. The City will be responsible for the

development of standard road cross-sections that it will review, from time to time or as necessary, to ensure responsiveness to development trends (section 4.5.2.9);

- From a streetscape perspective, the City may require additional road right-of-way to accommodate improvements like medians, double-row planted street trees and civic design considerations (section 4.5.2.10);
- The City shall, in planning and providing access to roads, endeavour to achieve a safe and quiet atmosphere in residential areas by (section 4.5.2.23 i to ii):
 - Using street designs, which discourage excessive speeds such as the use of narrower local streets;
 - Requiring the provision of adequate off-street private parking; and,
- Reverse frontage shall be discouraged and used on a limited basis when no other mitigation measures are deemed to be feasible. Window streets are encouraged. Where reverse frontage is permitted, developers shall be required to contribute to a perpetual maintenance fund for the upkeep of associated attenuation features (section 4.5.2.27);
- The City shall ensure that all public road design and construction are consistent with the City of Brampton Accessibility Technical Standards (section 4.5.2.28);
- New development shall have regard for all current policies and guidelines of the Ministry of the Environment, Ministry of Municipal Affairs and Housing, the Region of Peel, the City of Brampton and railway operators relating to noise or vibration (section 4.6.15.1.1);
- Components of streetscape shall consist of street trees, lighting, street furniture, signage, built form, landscape features, road infrastructure and sustainable management practices. The design of these streetscape elements shall be coordinate to achieve the following objectives (section 4.11.2.1.2):
 - Communicate the image and character of the community;
 - Reinforce the street network and enhance special community roads (primary streets);
 - Promote an urban relationship between built form and public spaces;
 - Enhance the daily experience of the residents and visitors;
 - Achieve a pedestrian-scaled environment for the public domain that is safe and comfortable;
 - De-emphasize the importance of the car/garage on the streetscapes;
 - Promote sustainable management practices to address water quality, including minimizing impervious cover; using “at source controls”, and infrastructure that is environmentally friendly; and,

- Establish a level of landscaping and paving appropriate to their role in the street network hierarchy and in line with the “Crime Prevention through Environmental Design” principles to reduce the incidence and fear of crime;
- Roofscape shall be designed to provide visual interest for the public streetscape (section 4.11.2.1.3);
- Electrical utilities are required to be placed underground in residential communities. The same standard shall apply to other parts of the City, particularly along arterial roads and in employment areas. Above ground utilities shall be visually screened by the use of “unique” utility box designs, street furniture, light standards and other streetscape elements (section 4.11.2.1.5);
- Unless otherwise specified, the overriding design consideration shall be to ensure harmonious integration with the surrounding area. This refers to compatibility in use, scale, form and character. Due consideration shall be given to a number of aspects including height, massing, disposition, setback from the street, distance between buildings, architectural form, colour, materials and cultural heritage conservation (section 4.11.3.2.3);
- Proposed development shall adhere to the existing prevalent road and lotting pattern in the area. Creation of public streets is preferred over private ones (section 4.11.3.2.4);
- There should be sufficient capacity in the existing transportation network, municipal infrastructure and community services to cope with the proposed development (section 4.11.3.2.5);
- Gradation of height should be used such that the lower building or portions of the building are placed nearest the neighbouring structures. To minimize potential effects on streets, stepping height should be used such that the portion fronting the street should be the lowest (section 4.11.3.2.6);
- The proposed development should not cause adverse effects on the adjacent areas especially in respect of grading, drainage, access and circulation, privacy, views, enjoyment of outdoor amenities, and microclimatic conditions (such that there would be minimum shadows and uncomfortable wind conditions) (section 4.11.3.2.7);
- Urban design objectives and principles shall form an integral part of the City’s land use planning and decision-making processes to ensure that the goal of achieving an attractive and sustainable physical environment is met. All forms of development shall be subject to the policies of this section (section 4.11.4.1);
- The City shall take a leading role in proactively promoting superior physical development design including the creation of a high quality public realm (section 4.11.4.2).

The Official Plan encourages a range of housing accommodation in terms of dwelling type, through appropriate mix and density policies. As per Section 4.2.1.2 – New Housing Mix and Density Categories Table, a maximum density of 50 units/net hectare and housing types of single detached, semi-detached and townhouses are permitted.

The proposed development will include a range of townhouse housing types with a density of 77 units per net hectare. The proposed townhouse typologies will accommodate a range of housing incomes and add to the existing housing mix offered in Brampton. This satisfies Sections 3.1 – Sustainable Planning Framework, Residential, 3.2.2.2, 4.2.1.2, 4.2.1.3 and 4.2.1.6 of the Official Plan.

This application proposes greater density than permitted by the Official Plan. As such, the Official Plan requires that criteria under Section 3.2.8.5 be satisfied. Staff have evaluated the proposed development according to this criteria and note that the application demonstrates that it satisfies the criteria as noted below. The development:

- is consistent with the general intent and vision of the Mount Pleasant Secondary Plan as it proposes the townhouse typologies already permitted by the “Medium Density” designation.
- contributes to the City’s desired housing mix by proposing a variety of townhouse typologies.
- contributes towards the targets set out in the Growth Plan;
- is located in an area envisioned as a Complete Community with convenient access to commercial, recreational and institutional uses;
- has existing infrastructure to service the development;
- has vehicular access to a local and a collector road;
- is in close proximity to Mount Pleasant GO Station as well Brampton Zum network with direct access from local transit as well as pedestrian, bicycle and vehicular access;
- is compatible with the adjacent residential uses as it proposes residential uses in the form of townhouses which are existing to the south and north-east of the development;
- maintains transition in built form through height, massing, character, architectural design, siting and setbacks from the low density uses to the north and the future high density uses to the south;
- meets the City’s minimum Bronze threshold for Sustainability Score.

Based on the foregoing, the proposed development satisfies Section 3.2.8.5 of the Official Plan. The Official Plan Amendment attached as Appendix 11 proposes a site-specific policy for an increased density at this site.

The proposed development aligns directly with City’s policies concerning site design. The proposal provides a variety of housing types and architectural styles that takes into consideration the character of the adjacent neighbourhood. The dwellings will be appropriately setback from the existing residential uses to the north and south. A decorative fence will be installed along the southern property boundary to provide privacy and separation between existing and proposed uses while ensuring a pleasant realm at the ground level. An Urban Design Guideline document specific to this development has been reviewed and approved by staff. This document identifies principles that will guide the design of key elements such as unit widths and depths, façade design, amenity areas, and landscape design, and will be implemented during the detailed design stage. This satisfies Sections 3.1 – Urban Design, 4.2.1.14 I to vii,

4.2.7.1, 4.2.7.3, 4.5.2.9, 4.5.2.10, 4.5.2.23 I to ii, 4.5.2.27, 4.5.2.28, 4.11.2.1.2, 4.11.2.1.3, 4.11.2.1.5, 4.11.3.2.3, 4.11.3.2.4, 4.11.4.1 and 4.11.4.2 of the Official Plan.

Staff have reviewed technical studies including functional servicing report, storm water management report, noise impact study, traffic impact study, planning justification report, Stage 1 and 2 archaeological assessments and have no further concerns. The recommendations of these studies will be implemented at the detailed design stage. This satisfies Section 4.6.15.1.1, 4.11.3.2.5, 4.11.3.2.6, and 4.11.3.2.7 of the Official Plan.

The proposed development is located in proximity to recreational open spaces and commercial uses. The Creditview Sandalwood Park which offers active and passive recreational uses is located approximately 1 km away (15 minutes walk) from the proposed development. Also, a commercial plaza at the corner of Sandalwood Parkway and Mississauga Road which includes a grocery store, café, banks and other service commercial uses is located approximately 650 metres away (8 minutes walk). This satisfies Section 3.1 – Sustainable Planning Framework, and Recreational Open Spaces of the Official Plan.

Based on the above, staff is satisfied that the proposed development conforms to the general intent and vision of the City of Brampton Official Plan.

Mount Pleasant Secondary Plan (Area 51)

The property is designated “Low/Medium Density”, “Medium Density” and “Peel Regional Police Association Special Policy Area” in the Mount Pleasant Secondary Plan (Area 51).

The following Secondary Plan policies are applicable to this application:

- The various residential designations shown on Schedule SP51 (a) are categories in which the predominant land use is for Low/Medium Density and Medium Density forms of housing. Proposals for residential development shall be considered in accordance with the policies of the Official Plan and this Chapter. Complementary uses as set out in Part I of the Official Plan, or as specifically identified by other designations or policies in this Chapter, shall also be permitted in the various Residential designations, provided that they are integrated in an appropriate manner with adjacent residential uses (section 5.1.1.1);
- Where residential use is proposed adjacent to arterial roads, railway lines, or other noise sources, studies to determine the need for noise attenuation measures shall be completed to the satisfaction of the City of Brampton and the appropriate agencies (section 5.1.1.2);
- Any proposals for residential development will have regard for the transition and physical integration with adjacent forms of development and effective separation and buffering from major roads and other noise sources (section 5.1.1.3);

- In areas designated Low and Medium Density Residential on Schedule SP51 (a), the following shall apply, subject to Section 5.1.1 of this Chapter: (section 5.1.2.1 i to iii);
 - Permitted uses shall include single-detached, semi-detached, townhouses and lane-based townhouse structural types, stormwater management facilities and other infrastructure, places of worship, schools and parks;
 - A maximum density of 36 units per net residential hectare (15 units per net residential acre) shall be permitted);
 - Minimum lot widths and the percentage of single detached structural units shall be determined at the Block Plan Stage;

- In areas designated Medium Density Residential on Schedule SP51 (a), the following shall apply, subject to Section 5.1.1 of this Chapter: (section 5.1.3.1 i to vii);
 - Permitted uses shall include single-detached, semi- detached, apartments, duplexes, maisonettes, triplexes, and townhouse structural types, as well as live/work units, seniors' residences, retail/office/restaurant commercial, stormwater management facilities and other infrastructure, places of worship, schools and parks;
 - Permitted building heights shall range between 2 to 6 storeys. The ultimate height of all buildings and the provision of taller buildings greater than 6 storeys will be subject to suitable justification being provided at the Block Plan Stage through the required Community Design Guidelines, without the need for an amendment to the Secondary Plan;
 - A maximum density of 60 units per net residential hectare (24 units per net residential acre) shall be permitted;
 - Minimum lot widths and the percentage of single detached structural units shall be determined at the Block Plan Stage;
 - The boundary of the Medium Density Residential designations shall be interpreted as being approximate and shall be further refined at the Block Plan Stage;
 - The physical integration of the Medium Density Residential designations with the Mixed-Use designations shall be further refined at the Block Plan Stage, including, but not limited to, determining the range of uses, density and built form;
 - All proposals for apartments, duplexes, maisonettes, and triplexes will have regard for the achievement of acceptable transition and physical integration

with lower density forms of development and minimize shadowing and the overlooking of lower density residential forms;

- The Peel Regional Police Association lands on Schedule SP 51(a) comprise a longstanding use associated with agriculture and private recreation (section 5.1.3.3):
 - These lands are intended to be redeveloped consistent with the vision for the balance of the Mount Pleasant Secondary Plan community. More specifically, permitted uses shall include Low and Medium Density Residential, and Medium Density Residential, in accordance with Sections 5.1.2. and 5.1.3, as well as a Place of Worship, park, a segment of the transit spine collector road and a portion of the Huttonville Creek Natural Heritage System as depicted on Schedule SP 51(a);
 - Re-development of this Special Policy Area will require the submission of an application to amend the Zoning By-law, and be based on various supporting studies to be determined by the City. Nothing in this policy section or Chapter prevents the existing permitted private recreation and agricultural use from continuing, in accordance with the applicable policies of the Official Plan and current zoning for the subject lands;
- Roads in the Mount Pleasant Secondary Plan are intended to develop and function in accordance with the guidelines and classifications outlined under Section 4.4 of the Official Plan, the policies of this Chapter and the supporting Mount Pleasant Secondary Plan Area Transportation Master Plan (section 6.2.1);
- Collector and Local Roads will be designed in such a manner as to support transit to the greatest extent practicable, including the potential use of exclusive transit links and pedestrian walkways where required to reduce pedestrian backtracking to access transit (section 6.2.3);
- To protect the function of Arterial Roads, it is the policy of the City to restrict access to them from individual properties. To that end, 0.3 metre reserves or other measures, as appropriate, shall be a condition of development approval for lands abutting Arterial Roads, except at approved access locations. However, access from a Concession Road shall be allowed to have continued access until such time as access from an alternative road becomes available (section 6.2.5);
- The Local Road network will be subject to the policies of this Chapter and will require approval as part of the Block Plan and the Subdivision Approval processes (section 6.2.6);
- The road network for the Mount Pleasant Secondary Plan shall be developed in the general location indicated on Schedule SP51 (a), and on Schedule B and B1 to the 2006 City of Brampton Official Plan, and in accordance with the applicable policies of this Chapter and other relevant policies of the Official Plan. Provided

that the general intent of this Chapter is not compromised, adjustments may be made to the location, alignment and right-of-way widths of the road network including the provision of additional road crossings of the Natural Heritage System as may be appropriate and supportable through the Block Planning and Subdivision Approval processes. Potential Collector Road crossings between Sandalwood Parkway and Wanless Drive are shown as “Potential Connection” on Schedule SP 51(a) and are conceptual road crossings subject to further analysis at the Block Planning Stages in the context of the Mount Pleasant Secondary Plan Landscape Scale Analysis and Subwatershed Study. The “Collector Road” and “Transit Spine Collector Road” on Schedule SP 51(a) may have right-of-way widths ranging from 21.5 metres to 26 metres with the final right-of-way widths to be determined through the Block Planning and Subdivision Approval processes (section 6.2.7);

- In order to encourage greater use of public transit within the community, the following guidelines shall be considered at the Subdivision and/or Site Plan Approval Stage (section 6.3.5 i to ii):
 - Local Road patterns should provide direct pedestrian/cyclist access to transit stops; and,
 - Along Arterial Roads, lots shall be separated from such roads by service roads (window roads). The provision of Window Roads along Arterial Roads shall be as deemed appropriate by the City of Brampton through the Block Plan Stage;
- Sidewalks along Arterial and Collector Roads that are expected to accommodate transit routes shall incorporate bus pad widenings in appropriate locations in accordance with City of Brampton standards (section 6.3.6);
- The City shall encourage a range of options for the development of the Mount Pleasant Secondary Plan as a transit oriented community through the Block Plan and Subdivision Approvals Stages, including, but not limited to the encouragement of transit supportive land uses, densities and the implementation of unique transit oriented development and community features in accordance with the policies included in Section 12.4 (section 6.3.7);
- Pedestrian and cyclist links, facilities and infrastructure shall be provided, where appropriate, to integrate the elements of the Residential and Commercial Land Uses, Transportation, Recreational Open Space and Natural Heritage System s, to provide comprehensive access to those systems and to serve as a recreational and aesthetic amenity to the community (section 6.4.1);
- Development within the Secondary Plan Area shall be on full municipal sanitary and water services in the general locations identified on Schedule F to the 2006 City of Brampton Official Plan and accordance with Section 4.7 and other relevant policies of the Official Plan (section 7.1.1);

- A Stormwater Management Plan shall be undertaken for any development within the Secondary Plan Area, in general accordance with the approved North West Brampton Landscape Scale Analysis and Subwatershed Study. This plan shall be prepared and included with the related Environmental Implementation Report. The Stormwater Management Plan shall address such concerns as flow attenuation (quantity) water detention (quantity and quality), groundwater quantity/quality issues and erosion/siltation control design requirements, as appropriate (section 7.2.4);
- Individual subdivision based noise analysis reports in accordance with Section 4.4 and other relevant policies of the Official Plan and this Chapter shall be submitted, as necessary, at Draft Plan of Subdivision Stage so that adequate noise attenuation measures can be specified and guaranteed at the time of Draft Plan of Subdivision Approval. Site-specific noise analysis reports at the Block Plan Stage will be required only if it is determined that circumstances warrant such a report (section 7.3.1).

The proposed uses for this development include a range of standard, rear-lane and back-to-back townhouse units with a density of 77 units/net hectare. The unit width, depth and height as well as the design elements that will form the principle of site design have been finalized in the approved urban design brief and the implementing Zoning By-law. The proposed development will provide an appropriate transition from the existing development to the north to the future planned (current application) apartment development to the south. In addition, the proposed development is consistent with the Peel Regional Association Special Policy Area as it is consistent with the permitted uses in this area. The redevelopment of this area is being implemented by an amending Zoning By-law and through the approval of various supporting studies. This satisfies Sections 5.1.1.1, 5.1.1.3, 5.1.3.1 (i), (ii) and (iv) to (vii) and 5.1.3.3 of the Mount Pleasant Secondary Plan.

A noise impact study was submitted with the application. The recommendations proposed in the noise study were found capable of supporting this development. The mitigation measures will be implemented at the detailed design stage. This satisfies Sections 5.1.1.2 and 7.3.1 of the Secondary Plan.

The proposed development modifies the road network as initially approved in the Block Plan. A traffic impact study was submitted with the application to ensure that the modified road network will not have any adverse impacts to the surrounding road network. The study also takes into account the existing transit network on Veterans Drive. Staff are satisfied with the results of this study. As such, this satisfies Section 6.2.1, 6.2.3, 6.2.5, 6.2.7, 6.3.5 and 6.3.6 of the Secondary Plan.

A functional servicing report and stormwater management report was submitted with the application to ensure that the proposed increase in density will be adequately served by the existing servicing capacity. Staff has reviewed the studies and have no concerns with the results of the studies. This satisfies Section 7.2.4 of the Secondary Plan.

The proposed development is in proximity to the Mount Pleasant GO Station as well as the Brampton Zoo network. The existing local transit network provides direct access from Veterans Drive to the higher order transit options along with pedestrian and vehicular access. Further, this development will be well-served by existing public parks and recreation facilities in the surrounding area. As such, this satisfies Section 6.4.1 of the Secondary Plan.

The applicant has submitted a Secondary Plan Amendment attached as Appendix 11 to this report which proposes a site-specific “Medium Density” designation for the entire site that proposes an increase in density from 60 units per net hectare to 77 units per net hectare. This amendment will also re-designate the portion of the subject lands designated “Low/Medium” Density.

Based on the above, staff is satisfied that the proposed development is consistent with the general intent and vision of the Mount Pleasant Secondary Plan.

Mount Pleasant Block Plan (Area 51-1)

The property is designated “Medium Density” and “Low Medium Density” in the Mount Pleasant Block Plan (Area 51-1).

This Block Plan provides design direction for the implementation of the vision and intent identified within the Mount Pleasant Secondary Plan (Area 51). This Block Plan serves as a supplement to the City’s Development Design Guidelines (DDG), and represents a detailed refinement of the adopted Secondary Plan.

This application proposes a range of townhouse units including standard, back-to-back and rear-lane townhouses. All units will include vehicular access to a public street. Standard townhouses with a width of 7.0 m each will be located at the northern property boundary to provide adequate transition from the existing units to the north. The back-to-back townhouses will be located in the middle of the development to minimize any visual impact to the existing uses to the north and south. The rear-lane townhouses to the south will provide an adequate transition to the existing stacked townhouses to the south-east. The design of the garages will be designed to provide an attractive visual environment. The rear-lane townhouse block fronting on to Veterans Drive will have a setback of 3.0 metres in order to provide a comfortable and attractive streetscape. Veterans Drive is considered a Spine Road and as such, the townhouses will have articulated elevations to add visual interest to the streetscape. There will be direct access to transit from the development. The above discussed design principles have been finalized in the approved Urban Design Brief and will be implemented during the detailed design stage.

Based on the above, staff is satisfied that the proposed development is consistent with the general intent and vision of the Mount Pleasant Block Plan (Area 51-1).

Zoning By-law Amendment

The subject property is zoned “Agricultural - Section 249 (A - 249)” by By-law 270-2004, as amended. This zoning designation does not permit the proposed townhouse uses.

The following is an overview and rationale for the key requirements and restrictions contained in the Zoning By-law amendment recommended for approval in Appendix 11 of this report that is required to implement the proposed residential uses.

Residential Zoning Permissions

This Zoning By-law amendment proposes to rezone the property to four site-specific “Residential Townhouse (RE3)” Zones as well as rezone landscape buffers as “Open Space” (OS). The Zoning By-law Amendment includes site-specific zoning provisions, including but not limited to, lot area, lot width, yard depths and setbacks, building height and amenity area for the various types of proposed townhouse units. The detailed planning analysis (Appendix 8) includes a detailed overview of the Zoning By-law Amendment. Other development standards are also included in the proposed by-law amendment as shown in Appendix 12 – Draft Zoning By-law Amendment.

It should be noted that for the townhouse units the existing parking requirements contained in the City’s Comprehensive Area Zoning By-law 270-2004, as amended, will apply, namely, two parking spaces per dwelling unit.

Technical Requirements

The following technical requirements have been satisfied.

Planning Justification Report

The Planning Justification Report was submitted to the City to provide the rationale for the development, and to outline how the proposal aligns with provincial and municipal policy. The report and its addendums conclude that the objectives of the PPS, the Growth Plan, the Region of Peel Official Plan, and the general intent and vision of the City of Brampton Official Plan and the Mount Pleasant Secondary Plan (Area 51) are satisfied and the development represents good planning. Planning staff have evaluated this study and have found it satisfactory.

Transportation Impact Statement

A transportation memo was submitted by the applicant to assess the transportation related aspects of the proposed development. The memo includes a review and assessment of the existing road network, traffic volumes, vehicle manoeuvring and circulation. The assessment found that traffic generated by the proposal is not expected to have significant impact on the existing roadway operations. The residential parking will be provided according to City Zoning requirements, 2 parking spaces per unit. Traffic staff have reviewed this study and have found it satisfactory.

Urban Design Brief

An addendum to the Community Design Guidelines Document was prepared in compliance with the City of Brampton's Development Design Guidelines. This document is required instead of an Urban Design Brief for areas with an existing Block Plan and design guidelines. Taking cues from the Block Plan design guidelines, this document develops a vision for the site that will be used as a guideline during the detailed design stage to create a visually attractive, transit-supportive and pedestrian friendly development with a well-designed public realm. Urban design staff have reviewed the design guidelines and have found the document to be satisfactory.

Functional Servicing and Stormwater Management Report

The applicant prepared a Functional Servicing and Stormwater Management Report in support of this application. The Functional Servicing Report provides background information regarding the subject property, summarizes the existing site conditions, provides information regarding the proposed development conditions, outlines the existing and preliminary proposed grading and outlines the existing and preliminary proposed servicing.

The Functional Servicing and Stormwater Management Report conclude that the proposed development can be serviced utilizing the existing and proposed infrastructure and that the subject property can be adequately serviced with water, sanitary drainage, stormwater drainage, and stormwater management.

Stormwater Servicing

The stormwater servicing for the subject lands will be implemented by two collector systems, minor and major. The minor system connects to the existing 1200 mm collector storm sewer on Veterans Drive via a proposed 1050 mm stub. This collector storm sewer services the subject site and discharges to SWM Pond HE-4 (which is the stormwater management pond for this block plan area).

The major system proposes a combination of local rights-of-ways within the draft plan to convey overland flows from major storm events to Veterans Drive via Keppel Circle with ultimate discharge to SEM Pond HE-4. It is expected that the capacity will be more than sufficient as no external storm drainage is to be conveyed through subject site, which falls within an upstream portion of the SWM Pond HE-4 contributing drainage area.

Sanitary Servicing

Sanitary servicing infrastructure has been designed to accommodate the subject lands. A 250 mm sanitary sewer stub is proposed on a revised alignment extending from the 450 mm trunk sanitary sewer on Veterans Drive to service the subject lands and replace the existing 250 mm sanitary stub. Sanitary flows from the subject lands will be conveyed via the existing infrastructure on Veterans Drive and Sandalwood Parkway which outlets to the existing 1200 mm sanitary trunk on Mississauga Road for treatment via the Lakeview Wastewater Treatment Plan. There are no constraints or concerns

with sanitary conveyance as the proposed sanitary sewer stub and existing trunk sewer has sufficient depth and capacity to service the subject lands.

Water Servicing

A proposed 200 mm watermain stub will extend along a new alignment from the existing 400 mm diameter watermain as located on the west side of Veterans Drive and will replace the existing 200 mm watermain stub originally provided to service the subject lands. The southern proposed access from Keppel Circle to Veterans Drive includes a proposed 200 mm watermain stub to tap into the existing 400 mm diameter watermain on the west of Veterans Drive. Lastly, a proposed 200 mm watermain stub will connect with the existing 200 mm watermain stub extended from the existing development to the north on Hoxton Road for a total of 3 external watermain connections. The results of the hydrant flow test determine that the existing municipal system should provide a sufficient level of service to meet the estimated water demand of the proposed development without the need for external upgrades or retrofits.

Engineering staff have evaluated these reports and have found them to be satisfactory.

Phase 1 and 2 Environmental Site Assessment

The Phase 1 Environmental Site Assessment conducted on the subject lands identified several potentially contaminating activities on and in the vicinity of the site, contributing to areas of potential concern on the site. Subsequently, a Phase 2 ESA was conducted on the subject lands, to investigate the areas of potential concern on the site.

The Phase 2 Environmental Site Assessment concluded that no exceedances of the applicable standards were found. As such, engineering staff have evaluated the study and have no further concerns with respect to the Environmental Site Assessment.

Noise Impact Study

The Noise Impact Study was prepared in order to outline the noise control measures needed to satisfy the noise requirements of the Region of Peel, City of Brampton and the Ontario Ministry of the Environment, Conservation and Parks. This report finds that the development will satisfy MECP's noise guidelines, Region of Peel and City of Brampton noise guideline limits to determine the need for noise mitigation. A future car wash proposed to the south of the site is identified as a noise emitting source. The noise mitigation measures will include grading transition between the subject lands and the lands to the south as well as mitigation measures at the car wash facility. These mitigation measures would be implemented at the detailed design stage. Acoustics staff have evaluated the study and have found this study to be satisfactory.

Archaeological Assessment Stage 1 and 2

The Archaeological Assessment Stage 1 filed with the application contains background research to determine whether there are any sites of heritage significance on the subject lands. The results of Stage 1 study determined that a Stage 2 assessment was required.

The Stage 2 assessment was conducted by means of a test pit survey at five-metre intervals, increased to ten-metre intervals when disturbance was encountered. The results of the Stage 2 assessment determined that no archaeological resources were encountered during the course of this survey.

Heritage staff have reviewed the assessments and have no further concerns.

Tree Inventory and Tree Preservation Plan

The applicant prepared a Tree Inventory and Tree Preservation Plan which contains an inventory of all tree resources over 15 cm diameter at breast height (DBH) on or within 10 metres of the proposed development on private lands, and which evaluates potential tree saving opportunities. The study found a total of 168 trees meeting this definition and 157 trees will be removed to accommodate the proposed development. The City will require tree compensation at no cost to the City in the form of restoration-planting in accordance with the City's planting standards. Any remaining trees not compensated will require a tree compensation payment to the City as per the City's Tableland Tree Assessment Guidelines. The remaining 11 trees can be preserved providing appropriate tree protection measures are implemented prior to construction.

Open Space staff have evaluated the Tree Inventory and Tree Preservation Plans and have found it satisfactory.

Waste Collection Strategy

A Waste Collection Strategy was submitted with the application. The aim of this strategy was to demonstrate that the proposed draft plan will accommodate curbside waste collection in accordance with the Region of Peel waste collection requirements. The strategy notes that curbside collection is proposed for all townhouse types with collection area locations at the end of driveways for all units. Collection areas of at least 5 square metres will be accommodated. The site layout has been designed to provide maneuvering opportunities for the Region's waste collection vehicles. A minimum centreline turning radius of 13 metres has been included. The Regional staff have no concerns with this strategy.

Sustainability Score and Summary

The applicant has completed a Sustainability Assessment for the proposal and has provided a summary to measure the sustainability of the development proposal. The proposal achieves an overall sustainability score of 29 points that satisfies the City's minimum Bronze Threshold. Planning staff have evaluated the score and summary sheets, and have found it satisfactory.