

February 10, 2023

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21-3064

Mayor and Members of Council
City of Brampton
2 Wellington Street West
Brampton, ON L6Y 4R2

via email: cityclerksoffice@brampton.ca

Dear Mayor Brown and Members of Council:

**RE: Draft Major Transit Station Area Official Plan Amendment
North East Corner of The Gore Road and Queen Street East
Comments from TACC Holborn**

Malone Given Parsons Ltd. is the Planning Consultant for TACC Holborn Corporation and TACC Holborn (Block 139) Inc. (collectively “TACC Holborn”), who own the property located on the east side of The Gore Road, between Fogal Road and Queen Street East in the City of Brampton (the “Subject Lands”). The Subject Lands are subject to Plan 43M-2092, a subdivision plan registered in November 2020, and are within The Gore Major Transit Station Area (“MTSA”).

On behalf of TACC Holborn, we have reviewed the Draft Major Transit Station Area Official Plan Amendment dated January 2023 (the “MTSA OPA”). We respectfully request that areas with advanced MTSA studies, including the Subject Lands, be exempt from the Block Concept Plan requirement proposed under Section 3.2.6 of the MTSA OPA. In our opinion, the ongoing MTSA studies, such as for The Gore MTSA, achieve a similar outcome and, in the interest of advancing the province's objectives for the timely delivery of housing, the work should not be duplicated.

Context of the Subject Lands

Most blocks within the Subject Lands have received development approvals and are now constructed or under construction; this includes the low-rise residential neighbourhood to the north, a neighbourhood park, and a high-density mixed-use block along The Gore Road. Only Block 140 remains vacant at the direct intersection of The Gore Road and Queen Street East.

Figure 1: Site Location



Source: Google Earth (2021), MGP (2023)

TACC Holborn currently envisions a node of high-density mixed-use buildings within Block 140, with heights ranging up to 45 storeys. Adjacent to Block 140, Block 139 has an approved 25 to 35-storey mixed-use development, which serves as a transition between Block 140 to the south and low-rise residential uses to the north. The proposed height therefore complies with the policy direction to provide an appropriate transition to lower density residential areas and to direct the highest intensity uses within proximity to the transit stop. Block 140 is envisioned as a true mixed-use development that will complement the entire MTSA and support the City’s vision for the area. We note that TACC Holborn’s vision for the remaining Block 140 is generally consistent with The Gore MTSA Study and the Draft Brampton Official Plan’s vision for the area.

The Gore MTSA Study

We understand the MTSA Block Concept Plan is intended to provide a necessary comprehensive framework for “the distribution of development, provide design direction on streets and blocks, land use, including uses at street level, parks and open space, building massing, setbacks and frontage, public realm and streetscapes, parking and access, pedestrian connections and any natural or cultural heritage integration” within each MTSA (Policy 3.2.6). However, similar work is already being completed for The Gore MTSA through the City’s The Gore MTSA Study.

Staff have currently advanced studies of MTSA areas for the purpose of developing land use plans and long-term development policies for individual MTSA areas as part of the broader MTSA framework. On February 1, 2023, a focus group session was held for The Gore MTSA. Based on our review of the materials, we note that this Study provides many of the required components of the Block Concept Plan and associated Planning Justification Report. In particular, the Area Plan and Demonstration Plan provides land uses, including identifying parks and open space and a mobility network and demonstrates a general built-form vision within the MTSA.

The City is clearly leading a comprehensive effort to plan for The Gore MTSA area, and TACC Holborn will be providing comments regarding the Preliminary Area Plan and Demonstration Plan in a separate letter to Staff. We believe that the open engagement will result in a collaborative plan that achieves a compact, pedestrian-oriented and transit-supportive urban form that supports the delivery of the City's future transportation network. Logically, the Area Plan and Demonstration Plan will become the basis for long-term planning policies for The Gore MTSA.

A development proposal generally consistent with the future land use plan and long-term policies for The Gore MTSA would therefore support the MTSA framework that the MTSA Block Concept Plans are intended to demonstrate. Therefore, the development proposal would satisfy the requirements noted in Policy 3.2.6.2 of the draft MTSA OPA, which notes that “[a] Plan may not be required, provided it can be demonstrated to the satisfaction of the Director, Development Services that the proposed development does not preclude the achievement of a compact, pedestrian-oriented and transit-supportive urban form nor impact the delivery of the City's future transportation network”.

We note that the MTSA OPA is intended as an interim measure. However, the proposed policies and staff report do not clarify whether the Block Concept Plan will be a permanent requirement carried forward into the long-term policies for Primary MTSA's or the new Brampton Official Plan.

Based on the above, it is our opinion that a separate Block Concept Plan is not required for The Gore MTSA and other similarly advanced MTSA's, due to the advancement of The Gore MTSA Study. The requirement for a Block Concept Plan is more appropriately applied to Planned MTSA's that have not been studied.

Development Process Timing

The Province of Ontario (“Province”) has been clear that the road to supporting economic recovery includes building more housing in the face of a historic housing shortage and continuing to leverage the Province's investments in transit. Moreover, the Province recently passed the *More Homes Built Faster Act, 2022* (Bill 23) as part of a long-term strategy to increase the housing supply, with a target of building 1.5

million new homes in the next ten years to tackle the housing crisis. In the face of this provincial objective, it is critical that the development application process is not unnecessarily lengthened. While a Block Concept Plan may be appropriate in MTSA's that do not have associated planning work, the requirement in the MTSA OPA serves to create an unnecessary and duplicative approval layer in Primary MTSA's with advanced studies, such as The Gore MTSA.

We further note that the Subject Lands are physically separated from the rest of the MTSA by Fogal Road to the north, The Gore Road to the west, and Queen Street East to the south. This physical separation of the Subject Lands from other development blocks provides a logical boundary for potential block planning. However, the Subject Lands are already part of an approved subdivision and Block 140 is the last remaining vacant block. In this portion of The Gore MTSA, there are no other opportunities or potential development applications that would logically form a "block" with Block 140 for analysis. In our opinion, the Subject Lands have already undergone extensive block-wide analysis through the history of the previous development applications; the land uses and built form to the north, directly abutting Block 140, are approved and under construction.

In the context of The Gore MTSA, the requirement for a Block Concept Plan that includes the Subject Lands contributes to creating an inefficient development process, contrary to the Province's direction.

Conclusion

We respectfully request that areas with advanced MTSA studies, such as the Subject Lands, be exempt from the Block Concept Plan requirement proposed under Section 3.2.6 of the MTSA OPA. TACC Holborn is committed to working with Staff through The Gore MTSA Study to create a gateway MTSA development on the remaining undeveloped lands that provides a compact, pedestrian-oriented and transit-supportive urban form which supports the delivery of the City's future transportation network and therefore achieves a similar outcome as a Block Concept Plan.

We recognize the effort that City staff have put into the preparation of the MTSA OPA and thank Council for the opportunity to provide comments. We look forward to working with Staff to address our comments and finalize the MTSA OPA for Council's consideration in the coming months. As we advance further discussions with Staff on the MTSA OPA, The Gore MTSA Study, and the Draft Official Plan, we reserve the right to provide further comments.

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

Yours very truly,
Malone Given Parsons Ltd.

A handwritten signature in blue ink, appearing to be 'LC' or similar initials, written in a cursive style.

Lauren Capilongo, MCIP, RPP

cc: TACC Holborn Corporation
TACC Holborn (Block 139) Inc.
Henrik Zbogar, City of Brampton
Claudia LaRota, City of Brampton
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