

April 20, 2023

GSAI File: 571-002

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

Dear Mayor Brown and Members of Council:

**RE: Item 7.2 – Planning and Development Committee Meeting (April 24, 2023) Recommendation Report – City-Initiated Official Plan Amendment – Major Transit Station Areas – City-wide (“Recommendation Report”)  
Staff Report: Planning, Bld & Growth Mgt – 2023-239  
City of Brampton**

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Glen Schnarr & Associates Inc. (GSAI) is the planning consultant for 69 Bramalea Holdings Limited, the registered owner of 69 Bramalea Road in the City of Brampton (the ‘Subject Property’), which is subject to the Bramalea GO MTSA.

On behalf of our client, GSAI has been actively monitoring and participating in the City’s ongoing review of the Brampton Plan, Bramalea GO MTSA, and the ‘Interim’ MTSA policies, as outlined in the Staff Report (2023-239). We understand that the MTSA policies are to be adopted to guide development and land use decisions in MTSAs as the detailed planning and technical studies for “Primary” MTSAs are being completed and until Brampton Plan is in effect. We further understand the policies are being advanced as an interim measure to ensure that Brampton has the relevant planning framework to guide the ongoing transformation of lands along Brampton’s rapid transit corridors.

On behalf of 69 Bramalea Holdings Limited, we have reviewed the City of Brampton Staff Report dated March 8, 2023, along with the accompanying Official Plan Amendment and offer the following comments:

- **Policy 3.2.5.5** of the Amendment provides that Bramalea GO (KIT-2), as shown on *Schedule 1b* shall generally achieve a floor space index of 3.0 over the entire MTSA within building 3-25 storeys in height. This policy was added to the draft Amendment following the February 2023 Statutory Public Meeting. We understand

this policy was added to recognize that some of the Primary MTSA's, such as Bramalea GO, are currently designated in the 2006 Official Plan as "Gateway Hubs". Gateway Hubs in the 2006 Official Plan establish a floor space index that is to be achieved over the entire hub area and a range of building heights.

Until such time as the City's MTSA Study is completed and the final MTSA OPA is adopted by Council in November 2023, Staff note in the Recommendation Report, that it is necessary to recognize existing permissions regarding floor space index (FSI) and building height ranges for the Brampton GO, Bramalea GO, Mount Pleasant GO, and Gateway Terminal MTSA's. Policy 3.2.4.1.2 of the 2006 Official Plan established the floor space index and building height provisions in a Gateway Hub; however, through Policy 3.2.5.1.4, the 2006 Official Plan allows for opportunities to exceed maximum height and density permissions. We recognize opportunities to exceed these permissions were rooted in Density Bonusing/Section 37, which is no longer applicable and has been replaced by the City's Community Benefit Charges By-law; however, it is our opinion the policy direction to exceed height and density permission should be carried forward in the City's 'Interim' MTSA policies. We recommend the policy be amended to read as "The Bramalea GO (KIT-2), Gateway Terminal (HLRT-22) and Mount Pleasant GO (KIT-4) MTSA's as shown on **Schedule 1b** shall generally achieve a floor space index of 3.0 over the entire MTSA within buildings 3-25 storeys in height. Variation to the applicable floor space index and building heights, which do not alter the intent of this Plan, shall be considered without an Official Plan Amendment".

In the context of 69 Bramalea Road, through OPA2006-133, the Subject Property has policy permission for a mixed-use apartment building with no height maximum. More specifically, the Bramalea Mobility Hub (SPA9) Secondary Plan states, "...the implementation of the mixed-use apartment building that is permitted by OPA 133 may occur prior to any further master planning process, including the MTSA process, or municipal comprehensive review for this area." The Secondary Plan continues ... "the property municipally known as 69 Bramalea Road are already permitted by OPA 133, which is now in effect. The mixed-use apartment building that is permitted by OPA 133 will be implemented through further amendments to this Secondary Plan, which may include amendments to the text, policy and/or schedules of this Plan. The implementation of the mixed-use apartment building that is permitted by OPA 133 may occur prior to any further master planning process, including the MTSA process, or municipal comprehensive review for this area."

It is unclear how the Interim MTSA policies will be read and implemented in conjunction with the site-specific permissions for 69 Bramalea Road; recognizing that the policy framework allows amendments and applications to be advanced prior to an MTSA study.

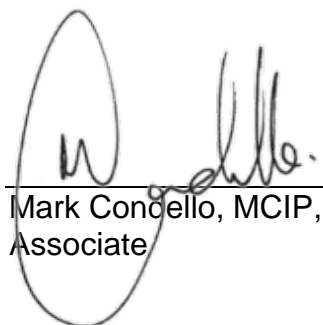
In the context of the existing policies, 69 Bramalea Holdings Limited is in the process of preparing *Planning Act* applications to facilitate the redevelopment of

the Subject Property for a mixed-use development, which heights that exceed 25 storeys. The applications follow years of processing, whereby the Subject Property was removed from the employment area and the Secondary Plan was amended to reflect the new planning direction for the site. A Pre-Application Consultation Meeting for the proposed redevelopment of the Subject Property was held in December 2022 and the Project Team is currently completing the necessary studies and reports to facilitate a 'complete application'. We anticipate filing the application with the City in May 2023. The proposed amendment should not derail that process.

- **Policy 3.2.7.4** of the Amendment speaks to the “planned scale and configuration” of development on an individual property. It is unclear how staff would interpret the policy in the context of the “configuration” of development not meeting the MTSA objectives. It is our opinion the objectives are generally appropriate to guide how development should occur in an MTSA. However, the Amendment should be amended to recognize that each property is unique and will have different opportunities and constraints for development. Accordingly, we recommend removing the word “configuration” and revising the policy to read as... “Where the planned scale ~~or configuration~~ of development on an individual property does not meet the MTSA objectives of this plan, property consolidation should be explored to facilitate integrated development. Where property consolidation is not feasible, development permissions may be limited.” This change provides clarification and focuses the policy on the planned scale and built form of a property.

Thank you for the opportunity to provide comments. We request notification of the passage of any By-laws and/or Notices on this matter. Should you have any questions, please contact the undersigned at [markc@gsai.ca](mailto:markc@gsai.ca) or 905-568-8888 ext. 265.

Yours very truly,  
**GLEN SCHNARR & ASSOCIATES INC.**



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