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City of Brampton
2 Wellington Street West
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Via email: mtsa@brampton.ca

Dear Ms. Gervais

**RE: SUBMISSION LETTER - MAJOR TRANSIT STATION AREA DRAFT POLICIES
BOVAIRD DRIVE WEST AND CREDITVIEW ROAD
OUR FILE Y378CF**

MacNaughton Hermesen Britton Clarkson Planning Limited (MHBC) is retained by Bovaird West Holdings Inc. with respect to the lands located on the northeast corner of Bovaird Drive West and Creditview Road in the City of Brampton more particularly described as Parts 1,2,3,4,5 and 8 on reference plan 43R-40331 (the 'Subject Lands').

The purpose of this letter is to provide our review and comments regarding the proposed land use and minimum density policies and schedules pertaining to Brampton's "Primary" MTSAs, as released on August 18, 2023. To facilitate a better understanding of the basis for our policy review comments and recommendations, we provide background context of the past decade of land use planning applications for the Subject Lands.

BACKGROUND CONTEXT

Subject Lands

The Subject Lands are currently designated 'Mixed Use Node' in the Fletcher's Meadow Secondary Plan and 'Residential' in the current City of Brampton Official Plan. The Subject Lands are zoned 'Commercial Three' in the City of Brampton Zoning By-law 270-2004, which contemplates residential and mixed-use development at a maximum height of 25-storeys. The Subject Lands are within the Mount Pleasant GO Primary Major Transit Station Area.

Zoning By-law Amendments

Between 2012 and 2016, Bovaird West Holdings Inc. made submissions to rezone the Subject Lands from the agriculture zone to permit mixed use, commercial and residential uses. As a result of the

City Council's failure to make a decision regarding a Zoning By-law Amendment application, it was appealed. During the case management hearings, Bovaird West Holdings Inc. and the City of Brampton agreed to mediation which resulted in the two parties reaching a settlement.

On July 10, 2017 the Ontario Municipal Board (OMB) issued a notice of decision regarding the zoning by-law amendment application submitted by Bovaird West Holdings Inc. for the properties located at the intersection of Creditview Road and Bovaird Drive West. Those properties were identified as Block 1 and Blocks 2, 3 and 4. The OMB's decision was to approve the zoning by-law amendment as follows:

Block 1: rezoned from Agricultural (A) to:

- Residential Apartments (R4A-3522; R4A-3523; R4A-3524(H))
- Commercial (C3-3525); and

Blocks 2, 3 and 4: rezoned from Agricultural (A) to:

- Residential Apartments (R4A-3527); and
- Commercial (C3-3526).

The Commercial Three (C3-3526) zone, applicable to Block 2 permits four types of uses:

- 1) Non-residential;
- 2) Residential;
- 3) Institutional; and,
- 4) Mixed Use Development.

As part of the settlement, a concept plan was submitted that represented the approved development of Blocks 1 to 4, which included the Subject Lands (Block 2). The development concept was to provide a variety of residential typologies and densities with evolving commercial amenities connected through safe and attractive streets to enhance the livability of the immediate area. The general structure of the Zoning By-law approval was based on a market-based progression that allows the development to evolve from vacant lands to a high-rise mixed-use hub.

In its decision, the OMB also noted the following:

[15] *The zoning by-law amendments are structured to facilitate phased development with residential and commercial uses. The development is to begin on the west in Block 1 first. The residential permissions envision the possibility of higher densities, including the redevelopment of lower-rise commercial areas, as the GO transit service is increased. Both the ROP and OP identify a Gateway Mobility Hub at this location which would be supported through the increased densities and redevelopment.*

The OMB's decision also stated that the zoning by-law amendment conformed with the Region's Official Plan, the City of Brampton's Official Plan, as well as the Province's 'in effect' Growth Plan 2017 policies.

Current Proposal

Our team has already submitted a pre-consultation application and held a pre-consultation meeting with City staff on March 1st, 2023 where we presented our initial development concept. Our target submission date for first submission is September 2023.

The proposed development for the Subject Lands will entail a total of 7 towers with a combination of high-rise residential and mixed-use, with heights ranging from 28 to 47 storeys, and an overall gross FSI of 6.24. The Subject Lands represent an opportunity to intensify the Mount Pleasant GO Major Transit Station Area and provide much needed housing in Brampton. In addition, the proposed provision of privately-owned public space (POPS) and ground floor retail will contribute to a complete community and enhance the public realm.

REVIEW

The policies released are high-level to guide overall development in the Primary MTSA. It is understood that comprehensive land use planning policies are intended to be brought forward in Q2 2024 through Precinct Plans or OPAs to the applicable Secondary Plans. The comprehensive plans will include policies pertaining to urban design, built form, transportation, active transportation, community services, parks and open space, infrastructure, phasing and implementation.

The proposed draft MTSA policies and schedules have been reviewed as they affect the Subject Lands. As a preliminary overview, the Mt. Pleasant Station Draft Land Use Plan indicates that the Subject Lands are designated:

- High-Rise Mixed-Use
- Proposed public or private street
- Mid-block connection

It is understood and appreciated that the proposed MTSA land use policies do not include any maximum density or maximum building height policies for lands within "Primary" MTSA. This is aligned with the direction provided by the Minister of Municipal Affairs and Housing. Rather, the draft policies have put focus on the provision of minimum density requirements within MTSA. We have no issue with regard to the proposed minimum density requirement of 2.5 (Floor Space Index) for the high-rise mixed-use designation.

It is understood and appreciated that changes to the location or alignment of the 'Proposed Public or Private Street Network' or 'Mid-Block Connections' will not require an amendment, provided that the general intent and purpose of the plan is maintained. The proposed development of the Subject Lands will include an additional mid-block east-west connection.

CONCLUSION

It is understood that a statutory public meeting will be held on August 28, 2023, to present the proposed land use and minimum density policies; representatives from our office will be in attendance.

On behalf of our client, we appreciate the opportunity to provide comments to the City of Brampton with respect to the proposed land use and minimum density policies and schedules pertaining to Brampton's "Primary" MTSA. We will continue to monitor the OPA and MTSA Study processes and may provide further comments. If there is anything further you may require in relation to this letter, please do not hesitate to contact us.

Thank you.

Yours truly,
MHBC

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

Oz Kemal, BES, MCIP, RPP
Partner

cc. S.Bishop, B.Sanderson, P.Abhari, S.James, K.Martin - Bovaird West Holdings Inc.