

October 19, 2023

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

via email: cityclerksoffice@brampton.ca

Attention: Mr. Steve Ganesh
Commissioner, Planning, Building and Growth Management

Dear Mr. Ganesh:

RE: Recommendation Report: Proposed Adoption of the City of Brampton 2023 Official Plan (Brampton Plan)
TACC Holborn (Block 140) Inc.

Malone Given Parsons Ltd. is the Planning Consultant for TACC Holborn (Block 140) Inc. ("TACC Holborn"), who own the property located on the northeast corner of The Gore Road and Queen Street East in the City of Brampton, legally described as Block 140 on Registered Plan 43M-2092 (the "Subject Lands").

On behalf of TACC Holborn, we have reviewed the new 2023 Brampton Official Plan being Attachment 1 to the Recommendation Staff Report dated October 23, 2023 (the "Final Brampton OP"). We previously submitted a letter outlining our comments on the draft Official Plan dated October 6, 2023 and a letter dated August 25, 2023 commenting on the draft Major Transit Station Policies ("MTSA").

We note that significant changes have been made to the MTSA policies (part of Section 4 of the Final Brampton OP) including the removal of the target employment to residential ratios and allowing for all types of employment uses, including population serving employment to be considered employment generating jobs.

With the changes made to the MTSA Mixed Use Employment (Office Mixed-Use) designation policies, a new policy has been introduced which allows the introduction of residential uses within the Mixed-Use Employment designation subject to achieving a series of criteria. One such criteria that we are concerned with is (c)(vi) which states:

(c) Lands designated Mixed-Use Employment (Office Mixed-Use) may also permit sensitive land uses, including mid-rise and high-rise residential uses and a day nursery without an amendment to this Plan, subject to satisfying the following criteria:

vi) Maintains the primary employment function of the Mixed-use Employment (Office Mixed-Use) designation.

Read together with Policy (a) of this section which permits primarily major office uses (among other uses), it is our concern that Policy (c)vi) will require Block 140 to provide a substantial number of jobs that far exceeds the 860 jobs required under Special Land Use Policy Area 3. It is our opinion that the 860 job requirement under Special Land Use Policy Area 3 continues to be the appropriate employment target for Block 140.

TACC Holborn is working towards the submission of development applications for the Subject Lands and is currently awaiting staff comments in response to our Stage 2 Pre-Consultation meeting. The Concept Plan shared with staff as part of this process proposes 2,545 residential units. Based on the City's Development Charges Background Study PPU rates, a mix of large and small apartment units would result in approximately 4,657 residents.

Based on the Mixed-Use Employment designation policies, TACC Holborn would be required to provide substantially more jobs than the planned residential population of 4,657 people despite Special Land Use Policy Area 3 containing a pre-determined employment target of 860 jobs.

Proposed Policy Modification to the Special Land Use Policy Area 3

To address our concerns, we are proposing that Special Land Use Policy Area 3 policy be modified to clarify that the required 860 jobs is notwithstanding the Mixed-Use Employment (Office Mixed-Use) designation policies. Our proposed modifications are shown in underline as follows:

*"To ensure that employment targets are achieved for the subject lands, provisions will be included in the implementing **Secondary Plan** Amendment and Zoning By-law for Special Land Use Policy Area 3 to ensure that higher order, higher **density** employment uses will be located within the Mixed-Use Employment designation. Notwithstanding the Mixed-Use Employment (Office Mixed use) policy (c)vi) designation, the subject lands will have a minimum area of three hectares (7.5 acres) and will be developed to accommodate a minimum of 860 jobs."*

Conclusion

TACC Holborn recognizes the efforts that City staff have put into the preparation of the Final Brampton OP. We welcome the opportunity to meet with City staff in advance of Council's consideration of the Final Brampton OP to discuss our 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 read 'LC' or similar initials, with a stylized flourish.

Lauren Capilongo, MCIP, RPP

cc:TACC Holborn (Block 140) Inc.