



PLANNING OPINION REPORT

Zoning By-law Amendment
18-28 Elizabeth Street North and 31-33 George Street North
City of Brampton, ON

Prepared For:
Greenwin Corp. and Sweeny Holdings Inc.



October 2021



Zoning By-law Amendment

Planning Opinion Report

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City of Brampton, ON**

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1.0

Background

1.1 Overview

Greenwin Corp. and Sweeny Holdings Inc. (“Greenwin and Sweeny”) are the owners of five parcels of land in the City of Brampton, municipally known as 18-28 Elizabeth Street North and 31-33 George Street (“Subject Lands”).

They are proposing to redevelop the Subject Lands for a mixed-use building comprised of a 42-storey and a 34-storey tower. The proposed development will contain 771 rental dwelling units, including a minimum of 40 affordable rental units, 205 hotel suites, and 694 m² of retail space. Podiums ranging from 4- to 11-storeys will transition to the adjacent neighbourhood area consisting of lower density development. A detailed description of the proposed development is provided in Section 2.0 of this report.

Greenwin and Sweeny have retained Malone Given Parsons Ltd. to assist in obtaining approvals for the proposed development. This Planning Opinion Report is submitted to accompany a Zoning By-law Amendment (“ZBA”) application to amend Zoning By-law 270-2004 to rezone the Subject Lands and allow for site-specific provisions for increased site density, building height and other site-specific provisions.

Per City staff’s request, a Site Plan Review application will be submitted later in the planning process, following the public meeting associated with ZBA application.

1.2 Location & Context

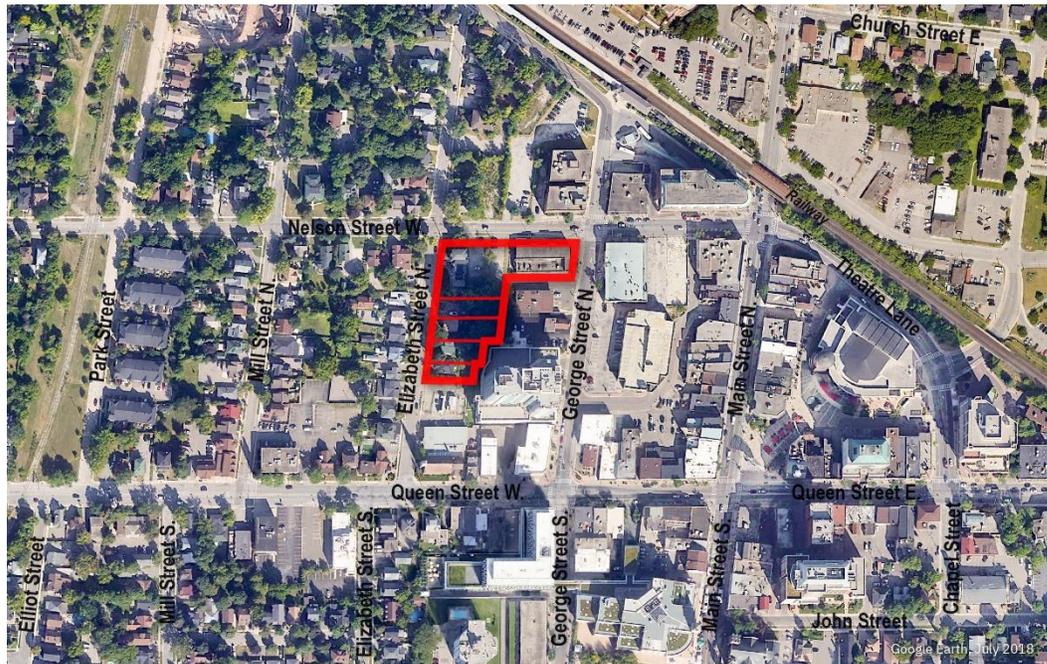
The Subject Lands are located south of Nelson Street West, between Elizabeth Street North and George Street North within the Downtown Core precinct of the City’s Central Area. The Subject Lands have a total area of approximately 0.60 hectares (1.49 acres) and are currently occupied by a residential dwelling designated under the *Ontario Heritage Act*, four single detached residential dwellings and a commercial building. The heritage dwelling is planned to be incorporated into the redevelopment concept and the remaining buildings are proposed to be demolished.

The Subject Lands and surrounding context are shown in Figure 1.1. Table 1.1 provides a legal description of the properties.

Table 1.1: Legal Description

#	Party To	Municipal Address	Legal Description	Area (ha)
1	Elizabeth/George Holdings Inc.	28 Elizabeth Street North 31-33 George Street North	LT 10 BLK 2 PL BR-4 BRAMPTON S OF NELSON ST; LT 11 BLK 2 PL BR-4 BRAMPTON S OF NELSON ST; PT LT 7 BLK 2 PL BR-4 BRAMPTON S OF NELSON ST; PT LT 8 BLK 2 PL BR-4 BRAMPTON S OF NELSON ST; PT LT 9 BLK 2 PL BR-4 BRAMPTON S OF NELSON ST; PT LT 12 BLK 2 PL BR-4 BRAMPTON E OF ELIZABETH ST AS IN VS296767; S/T VS171756 ; S/T RO794348 CITY OF BRAMPTON	0.34
2	Elizabeth/George Holdings Inc.	24 Elizabeth Street North	PART LOT 12 BLOCK 2 PLAN BR-4 BRAMPTON, BEING PART 1 PLAN 43R11278 CITY OF BRAMPTON	0.07
3	Elizabeth/George Holdings Inc.	22 Elizabeth Street North	LOT 13 BLOCK 2 PLAN BR-4 BRAMPTON, BEING PART 2 PLAN 43R11278 CITY OF BRAMPTON	0.083
4	Elizabeth/George Holdings Inc.	20 Elizabeth Street North	PT LT 14 BLK 2 PL BR-4 BRAMPTON E OF ELIZABETH ST AS IN RO736034 ; BRAMPTON	0.07
5	Elizabeth/George Holdings Inc.	18 Elizabeth Street North	PT LT 15 BLK 2 PL BR-4 BRAMPTON E OF ELIZABETH ST AS IN RO912833 ; BRAMPTON. S/T EASEMENT OVER PT 6, PLAN 43R32143, IN FAVOUR OF LOTS 23, 24, 25, AND PT LOTS 14, 15, 16, 17 AND 26, BLOCK 2, BR 4, AS IN RO1127508, AS IN PR1491526	0.04
Total:				0.60

Figure 1.1: Subject Lands



SITE LOCATION AND CONTEXT
31 - 33 George Street North and
18 - 28 Elizabeth Street North, Brampton

 Subject Lands



Source: Google Earth (2018), Malone Given Parsons (2021)

1.2.1 Surrounding Land Uses

The Subject Lands are within the Downtown Core precinct of the City's Central Area, as well as the Downtown Brampton GO Major Transit Station Area, and the City's Anchor Mobility Hub. The Subject Lands are also identified within a provincially designated Urban Growth Centre (which is reflected in City and Regional policy as well). All of these areas where redevelopment and intensification are expected over the short- and long-terms to achieve pedestrian-friendly, transit-oriented development (see Figure 1.2).

The Subject Lands are adjacent to the City's Innovation District (see Figure 1.2). Of particular interest is the future Centre for Innovation that will be located at 21 George Street North, across the street from the proposed development. The Centre for Innovation will include a new central library, collaborative space for post-secondary institutions, and office space. Investments are clearly being made in the City's Central Area, particularly near the Subject Lands, and redevelopment is anticipated in the coming years.

The following summarizes the existing surrounding uses:

To the North:

- Office building
- Vacant property
- Brampton GO Station

To the West:

- Single detached dwellings

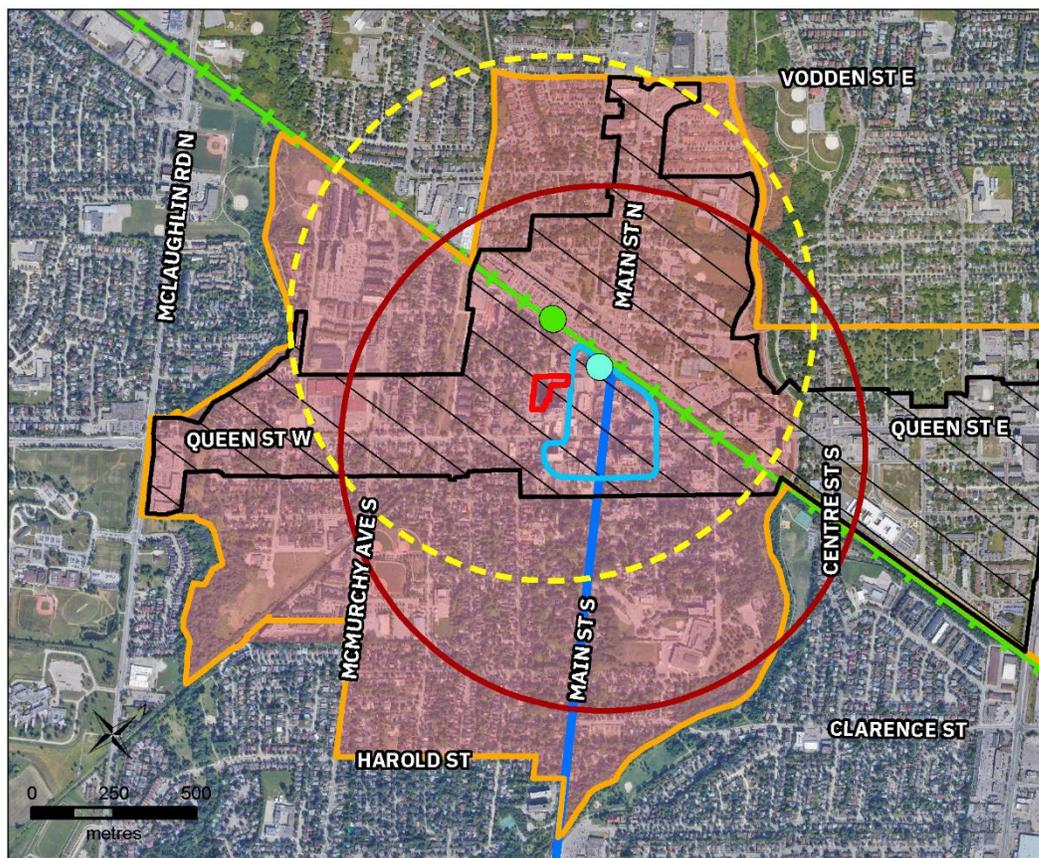
To the East:

- Commercial buildings
- LCBO
- Innovation District

To the South:

- High rise mixed-use building
- Commercial/office building
- Rowntree Montessori School
- Christ Church Brampton

Figure 1.2: Surrounding Context



- | | |
|------------------------------------|--------------------------------------------------------|
| Subject Lands | MTSA 800m Buffer |
| GO Station | Innovation District |
| Kitchener GO Train Line | Anchor Mobility Hub |
| Brampton Transit Downtown Terminal | Central Area - Schedule A General Land Use Designation |
| Future Hurontario LRT Line | Urban Growth Centre - Schedule 1A |
| | Downtown Secondary Plan Area |

Source: Google Earth (2018), Malone Given Parsons (2021)

1.2.2 Central Area, Urban Growth Centre, MTSA & Mobility Hub

The Subject Lands are located northwest of the Queen Street and Main Street intersection in the Downtown Core precinct of Brampton's Central Area. Brampton's Central Area encompasses an Urban Growth Centre as identified in the Provincial Growth Plan and Peel Region's Official Plan. It is planned to provide development of the greatest mass and highest densities in the City. The vision for the Urban Growth Centre and the entire Central Area is to reinforce its role as a focal area for investment in institutional and region-wide public services and residential, commercial, recreation, cultural, and entertainment uses.

The Urban Growth Centre contains connections for multiple rail and bus transit services and has been identified as an Anchor Mobility Hub in the Metrolinx Regional Transportation Plan and the City of Brampton Official Plan. Due to their proximity to the Brampton GO Station, the Subject Lands are also within a Major Transit Station Area, as per the Provincial Growth Plan and Peel Region's *The Major Transit Station Area Study – MTSA Profiles Part 1*. As such, transit-supportive densities, land uses, and built form designed to foster a pedestrian-friendly environment are the priority for development within the Urban Growth Centre (Brampton Official Plan Section 3.2.3).

As mentioned, the policy context expects substantial redevelopment in the Central Area and Urban Growth Centre, with a diverse mix of uses, and the greatest heights and densities. Evidence of redevelopment is beginning for this area, with a 27-storey building at 9 George Street North, a 27-storey mixed-use building under construction at 45 Railroad Street, a proposed 11-storey building at 117 Queen Street West, and the forthcoming Centre for Innovation at 21 George Street North. The City has also undertaken several studies and are pursuing investment opportunities to revitalize the downtown area, including investments in public transportation, streetscaping, expansion of post-secondary institutions among others.

The proposed mixed-use development will locate market and affordable rental housing, hotel, retail space, and restaurant/café uses in a compact, transit-supportive built form consistent with the planned high-density mixed use urban context envisioned for the area. Furthermore, the scale of development being planned for within the Urban Growth Centre positions the Subject Lands ideally to serve as a transition between the high-density downtown centre to the east and the established low-density neighbourhoods to the west. The proposed development will incorporate stepbacks/terracing and conserve the low-rise heritage house at 28 Elizabeth Street, to provide an appropriate transition to the low-rise buildings to the west.

The type of development planned for in the Urban Growth Centre provides ample opportunity for residents in the surrounding neighbourhood, including the Subject Lands, to have convenient access to a range of community amenities, human services and mobility options.

It is anticipated that this development will serve as a landmark building to the City of Brampton providing a further catalyst to the on-going redevelopment of the City's

Downtown Core.

1.3 Transit and Active Transportation Infrastructure

The Subject Lands are currently well serviced by existing train and bus transit and are well within the 500 m walking distance to transit. The Subject Lands are located within 100 metres of bus stops on George Street North, serviced by Brampton Transit Routes #1 and #1A. They are 250-300m south of the GO Station and are southwest of the Downtown Brampton Bus Terminal. The Subject Lands are northwest of the Queen Street and Main Street intersection which is serviced by a variety of bus routes. The Queen Street and Main Street intersection has also been identified as a stop on the future Hurontario Light Rail Transit (“LRT”) line by the Region of Peel’s Major Transit Station Area Study. Queen Street and Main Street are Bus Rapid Transit (“BRT”) Corridors as per Schedule C – Transit Network of the Brampton Official Plan. These corridors are key north-south and east-west spines linking destinations within and beyond the City and provide a high frequency of transit service with peak headways targeted at 5 minutes or less (Policy 4.5.4.2). This segment of both Queen Street and Main Street is part of the Brampton Transit network and is served by the following local and regional transit routes:

- **Brampton Transit Route #1/#1A** – A local route that operates east-west, generally along Main Street, from the Mount Pleasant GO Station to the Highway 50 Zum Queen Station Stop. Bus Route #1 operates daily, while Bus Route #1A only operates on weekdays, with frequency between approximately 15 and 30 minutes, dependent on the day.
- **Brampton Transit Route #2** – A local route that operates north-south, along Main Street, from the Highway 407 Park and Ride to Heart Lake Terminal. Bus Route #2 operates daily with a scheduled departure from the terminus stations every half hour.
- **Zum Route #501** – A regional Bus Rapid Transit route that operates along east-west, along Queen Street, from the Downtown Terminal Queen Stop in Brampton to the Smart VMC Terminal in Vaughan. Zum Route #501 operates daily with frequency between 15 and 30 minutes, dependent on the day.
- **Zum Route #502** – A regional Bus Rapid Transit route that operates north-south, along Main Street, from the Sandalwood Loop Stop in Brampton to the Mississauga City Centre Terminal in Mississauga. Zum Route #502 operates daily with frequency between approximately 10 and 25 minutes, dependent on the day.
- **Downtown Brampton Bus Terminal** - Brampton Transit Routes #1, #1A, #2, #24, #25, and #52 and Zum Routes #501, #501A, #502, and #561 stop at the Downtown Brampton Bus Terminal and/or the Main Street Zum Stations. The Downtown Brampton Bus Terminal is located less than 100 m from the Subject Lands and the Main Street Zum Stations are located less than 200 m from the Subject Lands.
- **Brampton GO Station** – The Brampton GO Station is serviced by the Kitchener Train Line and also provides VIA Rail service. The Subject Lands are within approximately 100 m of the Brampton GO Station.

Due to the ongoing Covid-19 pandemic, Brampton Transit is operating at reduced services levels. Zum Routes #501A, and #561 along Queen Street are cancelled until further notice.

Cycling facilities are proposed along Main Street and Queen Street, including designated bike lanes in proximity to the Subject Lands. The proposed facilities in proximity to the Subject Lands are identified as being provided in the short term on the Cycling Network Phasing Map of the City's Active Transportation Master Plan. Bike parking is currently provided at the Downtown Brampton Terminal.

1.4 Housing Crisis

It is useful to understand the City's housing situation to fully appreciate the need for rental and affordable housing at the proposed intensity.

According to Housing Brampton (2021) – the City's Housing Strategy and Action Plan – the City of Brampton is expected to increase by 156,900 households, reaching a total of approximately 324,800 households by 2051. Similar to most suburbs, Brampton's housing market supply has historically been low-density residential development, with the most common housing tenure being ownership. In 2020, Brampton had a rental vacancy rate of 1.3%, which is considered low. Canadian Mortgage and Housing Corporation defines a healthy vacancy rate as within 3%-5%, therefore demonstrating a need for rental housing in the City.

In 2020, the affordable rental threshold for households in the low- and medium-income groups was \$1,503, while the average rent for a bachelor unit according to Toronto Real Estate Board's 2019 Q4 Average Market Rents was \$1,600. The average rent for a three-bedroom unit or greater was \$2,324. Renter households in Brampton tend to disproportionately have low incomes compared to homeowners, demonstrating how unaffordable the average rent in Brampton is.

The 2018 Brampton Housing Needs Assessment recommended diversifying the City's housing stock by supporting a full spectrum of housing forms and unit types. Housing Brampton prioritizes increasing the supply of purpose-built rental housing for low- and moderate-income households and facilitating a wide range of rental housing near transit.

To accommodate the forecasted growth in Brampton, a significant amount of new housing will need to be built, and the low rental housing vacancy rate demonstrates that a portion of that new housing should be of a rental tenure.

The proposed development will provide 771 rental units, including a minimum of 40 affordable housing units (6 one-bedroom units, 20 two-bedroom units, and 14 three-bedroom units) to support both existing and future residents. The proposed development will provide units ranging in size from one- to three-bedrooms to attract a range of households. Affordable rental units in this case are defined as units where the maximum rental rate is 134% or lower of the median market rent within the municipality as reported annually by the Canada Mortgage and Housing Corporation (CMHC). In the case of the

Region of Peel, the affordable rental rates for 2021 are:

- \$1,742 for 1-bedroom units;
- \$1,956 for 2-bedroom units; and
- \$2,124 for 3-bedroom units.

The proposed development contributes to diversifying the housing forms, unit types, and housing tenures available in the City. The Subject Lands are located within walking distance of a range of transit options and will provide residents with access to a variety of amenities, employment and recreation opportunities. This will contribute to achieving the vision and implementing the recommendations of Housing Brampton. As mentioned, the development is proposing a minimum of 40 affordable rental units. The applicant is continuing to explore opportunities to provide an additional 30-40 affordable rental units within the project.

2.0

Proposed Development

2.1 Proposed Development

The proposed development (as shown in **Error! Reference source not found.**) is a mixed-use building consisting of two towers, 42-storeys and 34-storeys. It includes 771 residential rental units of various sizes, 205 hotel suites, and 694 m² of retail space. The proposed residential units range in size from one-bedroom to three-bedroom units, 40 of which will be affordable. A diverse indoor and outdoor amenity program is proposed to service future residents and hotel guests. The hotel will provide a mix of suite types with a portion tailored to the younger demographic and another portion tailored to longer-term stays.

Overall, the proposed development is designed with elevated design principles to match its status as a landmark development and to establish a strong street wall along George Street, Nelson Street, and Elizabeth Street North. It includes terracing on the south and east sides to provide a transition to the surrounding neighbourhood. Tower 1 is 42-storeys along Nelson Street to the north and begins to step back at the 11th storey. Tower 2 is 34-storeys and begins to terrace at the 4th storey. An 8-storey podium connects Towers 1 and 2. Landscaping along Elizabeth Street North will reinforce the residential character and pedestrian-scale along the street.

The existing house at 28 Elizabeth is designated under Part IV of the *Ontario Heritage Act* and will be preserved in-situ. Non-sympathetic extensions to the building will be removed and the exterior heritage fabric of the remaining building will be repaired and restored. Opportunities for restoration of lost heritage features will be explored where possible, including the recreation of the original tower and verandah. The interior spaces will be rehabilitated to provide additional uses on the property, though discussions with City staff are ongoing to determine the best uses for the building. The landscape plan proposes a formal flower garden to reference the history and heritage of Brampton as the Flower City and continuing the landscaping along the rest of Elizabeth to provide an enhanced streetscape. Additionally, a courtyard-type plaza will be provided to integrate Haggertlea into the proposed development.

Driveway access is proposed off of Elizabeth Street North. Garage access, service/loading spaces, parking and drop off areas are provided internal to the site away from public view. A total of 477 vehicular parking spaces are provided, which include 12 barrier-free parking spaces. The majority of the proposed parking is provided within six-levels of

structured parking, one of which is underground. Of the proposed parking spaces, 326 spaces are allocated for resident parking, and 151 spaces are for visitors. It should be noted that a flexible approach is being taken to the structured parking on Levels 1 and 2 (the first two levels of above-grade parking in Tower 1). This level has been designed to be able to convert into office space should additional demand for office space arise. Storage lockers are provided on the 12th storey of Tower 1. Five loading spaces are provided on Level 1. A total of 530 bicycle parking spaces are proposed, of which 492 spaces are for long-term and 38 are for short-term bicycle parking.

Parking for non-residential uses will be accommodated off-site in the public parking facilities located downtown. In particular, non-residential parking will be accommodated in the Nelson Square public parking garage that is within a 100 metre walk of the proposed development. Parking in the Nelson Square garage is free for the first hour and on evenings and weekends and costs \$1.00/ 30 minutes with a daily maximum of \$9.00. Monthly and annual parking permits are also available at \$44.00 and \$308.00, respectively. The fee structure is compatible with the hotel and retail uses, given that retail demands are typically highest during the evening and weekend periods, many people choose to use private shared transportation modes, and the proximity to both local and regional transit routes.

A range of private amenity spaces are proposed within the development to serve future residents, totalling approximately 2,114 m² (22,759 ft²). These amenity spaces will be contained on the 5th floor of Towers 1 and 2 and will include both indoor and outdoor amenity space. The outdoor amenity space is proposed to include an artificial turf dog run, a vegetable garden, a barbecue and dining area, and various furnishings and privacy measures. In addition to the outdoor amenity space and terraces, a green roof will be provided on Level 12 of Tower 1. A fitness centre and flex space are contemplated as part of the hotel amenity space.

The proposed development has a total Gross Floor Area of 56,268 m² (605,663 ft²) and achieves a density of 9.30 floor space index.

In addition to the above, office, arts, culture and entertainment uses are being contemplated on the site subject to on-going coordination and confirmation with City staff. The applicant is also in the process of reviewing sustainable features that are to be incorporated into the proposed development

Table 2.1 summarizes the statistics of the proposed development. Table 2.2 provides a density calculation for the proposed development. However, the density calculation is a conservative estimate as density has not been attributed to the heritage space as Greenwin and Sweeny are working with staff to determine how to best use that space.

The proposed site plan is shown in Figure 2.1. Further detailed architectural drawings, including floor plans and elevations, are submitted as part of the application package.

Table 2.1: Proposed Lot Statistics

Specifications	
Subject Lot Statistics	
Total Site Area	6,049 m ²
Site Frontage along George Street North	257 m
Development Statistics	
Gross Floor Area	56,268 m ²
Maximum Storeys	42 storeys
Building Height	155.05 metres
Density	FSI 9.30
Total Residential Units	771 units
Total Hotel Units	205 units
Total Amenity Space	2,114 m ²
Total Retail Space	694 m ²
Total Vehicular Parking	477 spaces
Total Accessible Vehicular Parking	12 spaces
Total Bicycle Parking	530 spaces
Total Loading Spaces	5 loading spaces
Setbacks	
North Yard Setback (Nelson Street Exterior Side Yard)	2.0 m
South Yard Setback (Interior Side Yard)	3.6 m
East Yard Setback (George Street North Front Yard)	0.0 m
West Yard Setback (Elizabeth Street North Rear Yard)	3.0 m

Table 2.2 Proposed Density Calculation

Residents	
Units	771 Units
Residents @ 1.94 PPU (Apartments) (1)	1,496 Residents
Jobs	
Retail Space	694.4 m ²
Hotel Space	9,638.2 m ²
Jobs @ 50 m ² per Employee (2)	207 Jobs
Density (3)	
Total Residents and Jobs	1,702 Residents and Jobs
Residents and Jobs per Hectare @ 0.60 Ha	2,837 Residents and Jobs per Hectare

(1) Townhouse PPU from City of Brampton Development Charges Background Study, dated August 1, 2019

(2) Population-related Employment factor from City of Brampton Development Charges Background Study, dated August 1, 2019

(3) Density calculation is a conservative estimate as the heritage space has not been included due to ongoing discussions with City staff regarding the best use of that space

Figure 2.1: Proposed Site Plan



Source: Sweeny & Co Architects (2021)

2.2 Summary of Required Planning Applications

An amendment to Zoning By-law 270-2004 is required to permit the proposed development. A Site Plan Review application is required to provide detailed design of the proposed development. A Draft Plan of Condominium will also be required.

2.3 Public Consultation Strategy

As part of the proposed development, we understand that public consultation will be a key component of the application process. Greenwin and Sweeny will participate in public consultation associated with the applications for the Subject Lands.

Based on our experience in the City of Brampton, we understand that the City typically hosts an Open House session prior to the Statutory Public Meeting. Greenwin and Sweeny will attend the Open House as well as attend and present at the Statutory Public Meeting.

Considering the ongoing COVID-19 Pandemic, we will work with City staff to determine the most appropriate format for the Open House, which could be held in a virtual setting.

3.0

Supporting Studies

This section provides a summary of the technical studies completed for the proposed development. For the full break down and analysis on each subject matter, please refer to the appropriate study, which has been submitted as part of this application process. Please note that all information in this section has been quoted or paraphrased from the source reports and is intended to only provide a brief synopsis of each study.

3.1 Urban Design Brief

An Urban Design Brief was prepared by Sweeny & Co Architects Inc. (dated October 2021). The purpose of this brief is to examine the design of the public and private realms, the built form, and the sustainability aspects the proposed development.

The overall development vision is to create a significant mixed-use community with retail, hotel, and residential rental uses. Active transportation is encouraged through the provision of 0.7 bicycle parking spaces per unit and various pedestrian connections within the site and to locations off of the site.

The design of the public realm follows the lead of the street-level uses and the existing residential character of Elizabeth Street. The built form proposal consists of two towers on a podium, reflecting a bold, contemporary architectural style, with the restored Haggertlea as focal point at the Elizabeth St and Nelson St intersection. Active frontages are provided on George Street, Nelson Street, and Elizabeth Street through the inclusion of retail uses on George Street and Nelson Street and townhouse style units on Elizabeth Street. The development's sustainability principles of density, urban amenity, design, parking, and servicing are detailed in the brief.

3.2 Functional Servicing and Stormwater Management Report

A Functional Servicing and Stormwater Management Report (FSSR) was prepared by Counterpoint Engineering Inc. (dated October 2021). The purpose of the FSSR is to provide a site servicing strategy that addresses the requirements of the applicable regulatory agencies and provides the basis for detailed servicing design.

The FSSR concluded that the proposed development will be serviced by a new 150 mm \varnothing fire protection and domestic connection and a new sanitary connection to the existing facilities on Elizabeth Street North. The water demand requirement for the proposed development for maximum day demand plus fire flow is 129.11 L/s. Stormwater quantity

control will be provided on-site by approximately 184.0 m³ of underground storage. The subject site will also be required to retain/reuse 5mm of stormwater, as such a water balance volume of 21.9 m³ is required. The installation of an oil/grit separator will provide 80% total suspended solids removal. Finally, it is expected that all controls will be contained within the building structure, although the exact details will be determined during the building permit process.

3.3 Tree Inventory and Preservation Plan Report

A Tree Inventory and Preservation Plan Report (TIPP) was prepared by Kuntz Forestry Consulting Inc. (dated October 2021). The purpose of the TIPP is to provide information regarding trees within and adjacent to the Subject Lands.

A total of 66 trees with a diameter at breast height (DBH) of greater than 15 cm were inventoried and assessed on and within 6 metres of the Subject Lands. A total of 64 trees are proposed for removal including 16 trees that are recommended for removal due to poor condition. The remaining 2 trees can be saved provided appropriate tree protection measures are installed prior to development. Recommendations to minimize impacts the tree identified for preservation are included in the report. A total of 87 replacement trees are necessary to compensate for the removal of 64 trees between 15cm and 81.5 cm DBH.

3.4 Environmental Site Assessment (Phase I and Phase II)

A Phase I and a Phase II Environmental Site Assessment were prepared by MTE Consultants Inc. (dated August 2019 and October 2019, respectively). The purpose of the assessments is to identify potential sources of contamination and assess soil and groundwater quality on the Subject Lands.

The Phase II Environmental Site Assessment concluded that there is no visual or olfactory evidence of environmental impacts or groundwater contamination on the Subject Lands. Lead or salt were found above the 2011 Table 3 SCSs in three samples; however, the impacts seem to be limited to the shallow fill material. The sampled groundwater tested below the 2011 Table 3 SCSs for the analyzed parameters.

3.5 Archaeological Resource Assessment

A Stage 1 Archaeological Resource Assessment was prepared by Archaeological Services Inc. (dated March 2021). The purpose of the assessment is to evaluate the possibility for the survival of any archaeological resources of potential cultural heritage value.

Due to its proximity to West Etobicoke Creek, the property is within an area of potential for the presence of precontact or early contact period Indigenous archaeological resources; however, the potential for the survival of any Indigenous archaeological remains in primary contexts within the subject property is essentially nil due to the historic development activities that have altered the original topography. The majority of

the property has been thoroughly altered and therefore, these portions of the property do not retain archaeological potential. The surviving areas of lawn around the Haggertlea building may be similarly affected but warrant a Stage 2 Archaeological Resource Assessment due to their Euro-Canadian archaeological potential in relation to John Haggert's house built in 1870 and the associated uses.

3.6 Heritage Impact Assessment

A Heritage Impact Assessment (HIA) was prepared by GBCA (dated October 2021). The purpose of this assessment is to assess the impact of the proposed development on the heritage building and to provide mitigation strategies.

The HIA concluded that the integrity of the heritage resource will be maintained, as the existing building will be conserved in situ, adaptively re-used, and restored to preserve its heritage attributes. Non-sympathetic extensions will be removed, and exterior elements that have since been lost will be restored to allow the building's original architectural style to be fully appreciated. Identified impacts have been mitigated by landscape strategies, restoration and preservation strategies, and opportunities for future public programming. A recommended conservation approach and a heritage building protection plan are included in the HIA.

3.7 Traffic Impact Study

A Traffic Impact Study (TIS) was prepared by WSP (dated October 2021). The purpose of this study is to evaluate if there are any adverse impacts on the local transportation network related to the proposed development and to evaluate the proposed parking and loading arrangements.

The conservative approach forecasts that the proposed development will generate a total of 280 and 366 auto trips during the a.m. and p.m. peak hours, respectively. Virtually all of the study intersections are expected to continue to operate at an acceptable level of service and with all movements within capacity even by 2041. The TIS also concluded that the traffic generated by the proposed development can be readily accommodated by the existing road network without the need for geometric improvements. Only minor signal timing optimization is recommended which is to be expected given the horizon years being evaluated. Given the downtown setting, the availability of transit, and the proposed transportation demand management package, the proposed supply of auto and bike parking will adequately serve the needs of residents and residential visitors.

3.8 Pedestrian Wind Comfort Opinion Letter

A Pedestrian Wind Comfort Opinion Letter was prepared by Gradient Wind Engineering Inc. (dated October 2021). The purpose of the letter is to provide a professional opinion regarding anticipated pedestrian wind conditions for the site in advance of the forthcoming detailed wind tunnel study.

The height of the proposed buildings will rise significantly above the low-rise surroundings, which will tend to capture and redirect higher-level wind flows towards grade. However, the podium setbacks will tend to reduce downwash flows at grade for prominent westerly and northerly wind directions. Wind conditions along the Nelson Street and Elizabeth Street elevations are expected to be moderately windy at the base of the building during the colder months and mitigation may be required at primary building entrances. Portions of the terrace amenity space will likely require taller perimeter guards and/or canopies/pergolas due to anticipated windy conditions.

4.0

Planning Policy Analysis & Regulatory Framework

This section of the report provides an analysis of the proposed development in the context of the following Provincial, Regional and Municipal documents:

- Provincial Policy Statement (2020);
- A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019);
- Region of Peel Official Plan (December 2018 Consolidation);
- City of Brampton Official Plan (September 2020 Consolidation);
- Downtown Brampton Secondary Plan (February 2019 Consolidation); and,
- City of Brampton Zoning Bylaw 270-2004.

4.1 Provincial Policy Statement, 2020

The Provincial Policy Statement, 2020 (“PPS”) came into effect on May 1, 2020. It replaces the Provincial Policy Statement issued on April 30, 2014. The PPS provides policy direction on matters of provincial interest related to land use planning and development. In particular, the PPS provides long-term guidance for the development of healthy, liveable, and safe communities, a clean and healthy environment, and a strong economy. To achieve this, the PPS provides direction for focusing development in existing settlement areas and away from sensitive environments and natural or human-made hazards. All planning decisions “shall be consistent with” the policies of the PPS.

4.1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns

Section 1 of the PPS provides policy direction on building strong healthy communities. The objective of this section of the PPS is to manage and direct land uses to achieve efficient and resilient development and land use patterns. The PPS states that healthy, liveable, and safe communities are sustained by:

- *promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term (1.1.1.a);*
- *accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit 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; (1.1.1.b);

- *avoiding development and land use patterns which may cause environmental or public health and safety concerns (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 (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 (1.1.1.e); and,*
- *ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs (1.1.1.g).*

Development of the Subject Lands will make cost- and land-efficient use of underutilized land in an area where roads, sanitary and municipal infrastructure and services are already in place.

The proposed development accommodates growth within the built boundary of the settlement area, at a transit-supportive density, in a location where existing and planned transit are located. Further, the proposed development will diversify the housing stock in the City and Region, providing rental housing and affordable housing options to meet the needs of current and future populations. The proposed development offers an opportunity to intensify an underutilized site in the Urban Growth Centre which is an appropriate location for growth.

4.1.2 Focusing Growth in Settlement Areas

The Subject Lands are located within a “Settlement Area” as defined by the PPS. The PPS states that settlement areas shall be the focus of growth and development. Land use patterns within settlement areas shall be based on densities and a range of land uses which:

- *Efficiently use land and resources (1.1.3.2.a);*
- *Are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion (1.1.3.2.b);*
- *Support active transportation (1.1.3.2.e); and,*
- *Are transit-supportive, where transit is planned, exists or may be developed (1.1.3.2.f).*

Furthermore, Section 1.1.3.3 provides that planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a range and mix of housing through intensification and redevelopment. New development taking place in designated growth areas should occur in the built-up

area and shall have a compact form and mix of uses and densities to efficiently use land, infrastructure, and public service facilities (Section 1.1.3.6).

The Subject Lands are located within a Settlement Area where growth and development are to be focused. The intensification of the Subject Lands at a transit-supportive density better utilizes the existing and planned services and infrastructure.

The proposed development is supportive of existing and planned public transit by significantly increasing the ridership base in a location within walking distance to regional and local transit. The Subject Lands are also in close proximity to a range of existing or planned public service facilities including Brampton City Hall, Garden Square, Gage Park, the Brampton Library – Four Corners Branch, Employment Ontario Peel and the planned Centre of Innovation.

4.1.3 Employment

Section 1.3 of the PPS promotes economic development and competitiveness by:

- *providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs; (1.3.1.a)*
- *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; (1.3.1.b)*
- *encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4; and, (1.3.1.d)*
- *ensuring the necessary infrastructure is provided to support current and projected needs. (1.3.1.e)*

As mentioned, the proposed hotel and retail uses will employ approximately 207 persons in a compact development at an employment density of approximately 345 jobs per hectare. The proposed development is located outside of the City's employment areas and will not impact the range of suitable sites or opportunities for other employment uses to locate within the municipality. The proposed development is also being designed in a flexible manner to allow for two levels of the structured parking to be converted into office space, should the demand arise.

The proposed compact, mixed-use development provides employment uses that are compatible with the residential uses and will support a liveable community. As the proposed development is located within the Urban Growth Centre, the necessary public services facilities and transit infrastructure to support current and projected needs is or will be available.

4.1.4 Providing a Range and Mix of Housing

Regarding housing, Section 1.4 requires planning authorities to provide an appropriate

range and mix of housing options and densities required to meet the projected market-based and affordable housing needs of current and future residents (Section 1.4.3). The policies direct the development of new housing to areas where appropriate levels of infrastructure and public service facilities are available (Section 1.4.1). Section 1.4.3 further requires transit-supportive development and prioritizes intensification in proximity to transit including corridors and stations.

Consistent with the policies in Section 1.4, the proposed development of the Subject Lands is compatible with the surrounding existing and planned context, efficiently uses land, infrastructure, and public service facilities, as well as supports the use of existing and planned active transportation and public transit infrastructure (Section 1.4.3). The proposed mixed-use development responds to the housing crisis in Peel Region, providing a range of unit sizes (including Bachelor to 3-Bedrooms) with rental and affordable housing tenures. The proposed development offers a range of indoor and outdoor amenities and provides rental and affordable housing options in an urban context proximal to services and infrastructure that will meet the needs of current and future residents.

4.1.5 Heritage

Regarding heritage resources, the PPS states that economic prosperity should be supported by encouraging a sense of place by conserving features that help define character, including built heritage resources and cultural heritage landscapes (Policy 1.7.1.e). Significant built heritage resources and significant cultural heritage landscapes are to be conserved and development and site alteration on adjacent land to protected heritage property is only permitted where the proposed development and site alteration has been evaluated and demonstrates that the heritage attributes of the protected heritage property will be conserved (Policies 2.6.1 and 2.6.3).

28 Elizabeth Street North is a designated heritage property under the *Ontario Heritage Act* and is proposed to be conserved and restored in situ. The Heritage Impact Assessment prepared by GBCA, determined that the cultural heritage value of Haggertlea will be maintained through landscape strategies and restoration and preservation strategies.

For the reasons discussed throughout Section 4.1, it is our opinion the proposed development is consistent with the policies of the PPS.

4.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020

The Growth Plan for the Greater Golden Horseshoe (2020 Consolidation) (“Growth Plan”) came into effect on May 16, 2019 and Amendment 1 to the Growth Plan subsequently came into effect on August 28, 2020. It provides a framework for implementing the Province’s vision for building strong, prosperous communities within the Greater Golden Horseshoe to 2051. The Growth Plan provides direction related to land use and infrastructure planning, transportation, housing, and natural heritage and resource

protection. The Growth Plan emphasizes the need to build complete communities; support a range of housing options; prioritize intensification to make efficient use of land and infrastructure and support transit viability; provide for different approaches to managing growth that recognizes the diversity of communities in the Greater Golden Horseshoe; and conserve and promote cultural heritage resources (Section 1.2.1). All planning decisions “shall conform with” the policies of the Growth Plan.

4.2.1 Managing Growth and Delineated Built-Up Areas

The policies of the Growth Plan direct the vast majority of growth to settlement areas that have a delineated built boundary, existing or planned municipal water and wastewater infrastructure, and can support the achievement of complete communities (Section 2.2.1.2.a).

Complete communities feature a diverse mix of land uses; improve social equity; provide a diverse range of housing options, including second units and affordable housing, to accommodate people at all stages of life and the needs of all household sizes and incomes; expand convenient access to a range of transportation options, public service facilities and parks and open space; provide for a more compact built form and vibrant public realm; and, integrate green infrastructure and low impact development where appropriate (Section 2.2.1.4).

Schedule 3 of the Growth Plan assigns population and employment forecasts for all upper- and single-tier municipalities. Peel Region is forecast to accommodate 2,280,000 people and 1,070,000 jobs by 2051. The Growth Plan establishes a minimum intensification target for the Built-up Area and a minimum density target for the Designated Greenfield Area to accommodate this growth. Within the Built-up Area, intensification is expected to account for a minimum of 50% of growth and development by the time the next municipal comprehensive review is approved and in effect (Section 2.2.2). Transition policies of the Growth Plan allow this intensification value to gradually be implemented, with a minimum of 40% intensification (contained within the Region of Peel Official Plan as of July 1, 2017) permitted until the time of the next municipal comprehensive review. It is noted that Peel Region is currently undertaking a municipal comprehensive review; a draft Official Plan is expected to be brought to the Planning & Growth Management Committee in Fall 2021.

Section 2.2.2.3 of the Growth Plan requires municipalities to develop an intensification strategy to achieve the minimum targets through identifying strategic growth areas and the type and scale of development appropriate for these areas, generally encouraging intensification throughout the entire Built-Up Area while ensuring development supports the achievement of complete communities and the efficient use of infrastructure and public service facilities.

Section 2.2.3 of the Growth Plan defines Urban Growth Centres as focal areas for investment in regional public service facilities and commercial, recreational, cultural, and entertainment uses that accommodate and support the transit network and

accommodate significant population and employment growth. The Downtown Brampton Urban Growth Centre is planned to achieve a minimum density target of 200 residents and jobs combined per hectare (Policy 2.2.3.2.b).

The Subject Lands are located within the delineated built-up area and Urban Growth Centre of the City of Brampton, as shown on Schedule 4 of the Growth Plan. The proposed development is consistent with the objectives of the Growth Plan as it provides a transit-supportive intensification opportunity within an existing urban area, utilizes existing infrastructure, diversifies the housing stock, and proposes development in a compact built form proximal to a range and mix of land uses with access to a range of transportation options. Further, the proposed development is planned to achieve a density of approximately 2,837 people and jobs combined per hectare and contributes to achieving the Downtown Brampton Urban Growth Centre minimum density target.

4.2.2 Housing

The housing policies of the Growth Plan promote a diverse range and mix of housing options and densities, including second units and affordable housing to meet the projected needs of current and future residents and establishing targets for affordable ownership housing and rental housing (Section 2.2.6.1). Municipalities will plan to achieve minimum intensification and density targets, consider the range and mix of housing options and densities of the existing housing stock and plan to diversify their overall housing stock to support the achievement of complete communities (Section 2.2.6.2). Further, 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).

The proposed development provides a transit-supportive intensification opportunity which contributes to diversifying the housing stock offering rental housing and affordable housing units with units ranging in size from bachelor to three-bedrooms.

4.2.3 Employment

The employment policies of the Growth Plan direct retail and office uses to locations that support active transportation and have existing or planned transit (Policy 2.2.5.3). Similarly, surface parking is to be minimized and active transportation networks and a transit-supportive built form will be facilitated when planning for employment (Policy 2.2.5.4). The Growth Plan promotes the compact built form and intensification of retail and service uses and encourages the integration of those uses with other land uses to support the achievement of complete communities (Policy 2.2.5.15).

The proposed development includes hotel, retail, and restaurant uses estimated to accommodate approximately 207 jobs. The proposed development has also been designed to transition a portion of the parking structure to accommodate office uses if there is demand for additional office space in the future. The proposal minimizes surface

parking accommodating parking for the site within structured parking. Furthermore, the Subject Lands are located within walking distance to a variety of transit routes which will support existing and planned transit. The proposed development provides a compact built form and a variety of uses and amenities that will support the achievement of complete communities.

4.2.4 Major Transit Station Area

The Subject Lands are within ~500m of both the Brampton GO Station and the future Hurontario Line LRT stop at Queen and Wellington. As such, the Subject Lands are considered a Major Transit Station Area (“MTSA”). An MTSA is:

“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit stations areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk”

The Growth Plan states that development occurring in MTSAs should be transit supportive, encourage active transportation, and have access to major stations (Policy 2.2.4.8). Within all MTSAs, development will be encouraged to include a diverse mix of uses, including additional residential units and affordable housing, that supports existing and planned transit infrastructure and promote transit-supportive densities. Where appropriate, development will also be supported by providing alternative development standards such as reduced parking requirements (Policy 2.2.4.9).

Development of the Subject Lands will provide a compact mixed-use development containing rental and affordable housing proximal to existing and planned transit infrastructure. The proposed development provides an intensified mix of uses at an appropriate density within the MTSA. Active uses are proposed at-grade to animate the street frontage. Recognizing the Subject Land’s proximity to a range of transit services the proposed development provides a sufficient rate of vehicular parking, including carpool/hybrid-efficient vehicle spaces and focuses on providing an increased rate of bicycle parking to encourage active transportation.

The Subject Lands are located within the built-up area and the proposed development will efficiently use existing infrastructure, community facilities and transportation services. The proposed development will locate residents within walking distance to existing and future transit stops in addition to a number of institutional, civic and open space uses.

For the reasons discussed throughout Section 4.2, it is our opinion the proposed development conforms with the policies of the Growth Plan.

4.3 Peel Region Official Plan, 2018 Consolidation

The Region of Peel Official Plan was originally approved on July 6, 1998 and has been amended over time. Most recently, the Region of Peel Official Plan was consolidated in

December 2018 (“Peel OP”). The Peel OP, as amended, provides Regional Council with a long-term policy framework for decision-making and planning by protecting the environment, managing resources, directing growth, and providing Regional services in an efficient and effective manner. While there are policies under appeal, this report relies on in-force policies for its review. It should be noted that the Region is currently undertaking a review of the Peel OP as part of a broader municipal comprehensive review (“MCR”) to plan for growth to 2051, as per the Growth Plan

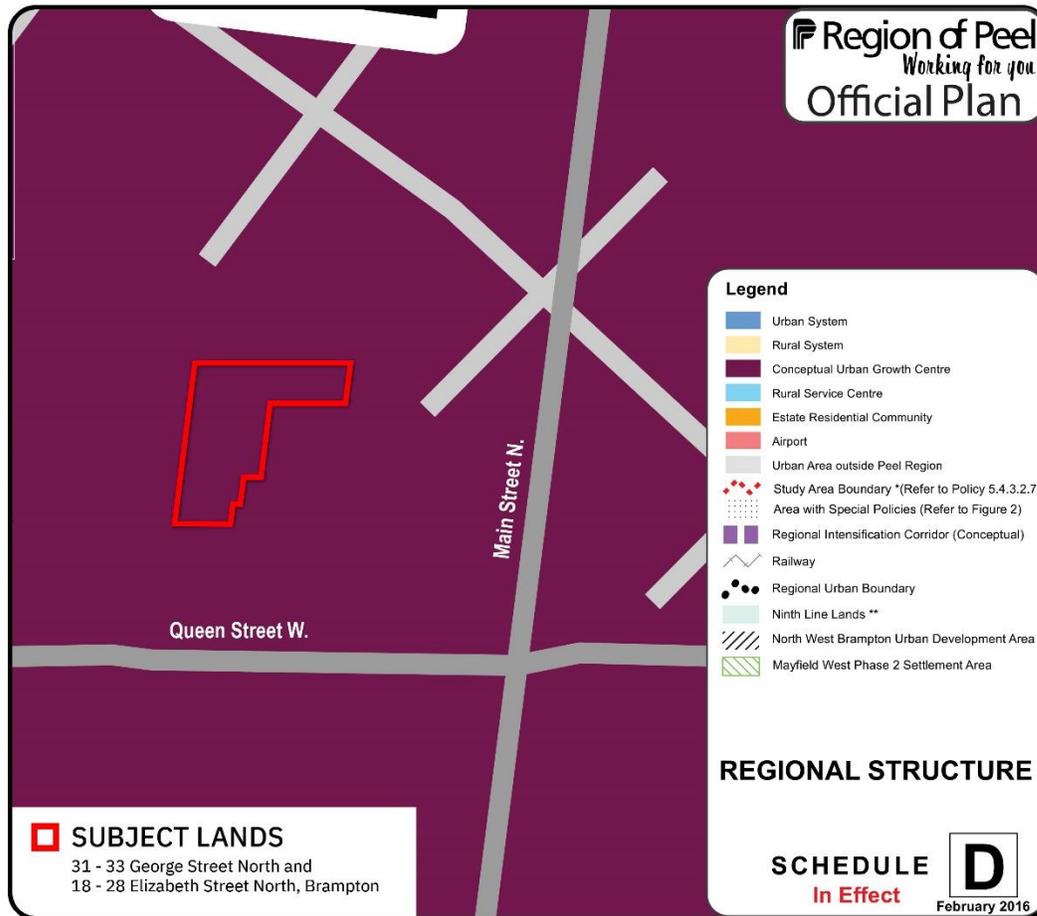
Goals of the Regional Official Plan include the creation of healthy and sustainable regional communities, recognizing, respecting, preserving and enhancing ecosystem features and function, recognizing the importance of a vital, competitive and diverse economy and managing and staging growth in a fiscally, environmentally and socially sustainable manner (Section 1.3.6).

4.3.1 Regional Structure

The Subject Lands are designated as “Conceptual Urban Growth Centre” on Schedule D: Regional Structure (Figure 4.1). The Urban Growth Centre is a location for major intensification that includes compact forms of urban development and redevelopment providing a range and mix of housing, employment, recreation, entertainment, civic, cultural, and other activities. Urban Growth Centres are focal areas for investment in region-wide public services and infrastructure including major transit infrastructure. (Section 5.3.3)

The general objectives of the Urban Growth Centre include achieving development nodes that are linked by public transit, include a range and mix of high intensity compact forms and activities, account for the characteristics of existing communities and services, support safe and secure communities, public transit, walking, and cycling, and incorporate a range and mix of residential and employment opportunities. Urban Growth Centres should achieve a minimum gross density target of 200 residents and jobs combined per hectare by 2031 or earlier. (Section 5.3.3.1)

Figure 4.1: Peel Region Official Plan Schedule D - Regional Structure



Source: Region of Peel (2016)

The proposed development provides a range and mix of uses, including residential, hotel, retail, and restaurant uses, in a compact built form at a high intensity. Greenwin and Sweeny are also exploring options for the inclusion of artistic and cultural uses in the conserved heritage building. The Subject Lands are proximal to a variety of public transit infrastructure and will support walking and cycling through the provision of sidewalks and bicycle parking. The proposed development provides for stepbacks and terracing to the west to account for the low-density nature and character of the existing community. The proposed development has a density of 2,837 residents and jobs combined per hectare which contributes to achieving the density target of 200 residents and jobs per hectare.

4.3.2 Growth Management

According to Table 3 of the Peel OP, Peel Region is forecast to grow to 1,640,000 persons, 518,000 households and 870,000 jobs by 2031. It is the objective of Regional Council:

“To optimize the use of the existing land supply of the Region by directing a significant portion of growth to the built-up areas through intensification, particularly the urban growth centres, intensification corridors and major transit service areas.” (Section 5.5.1.1)

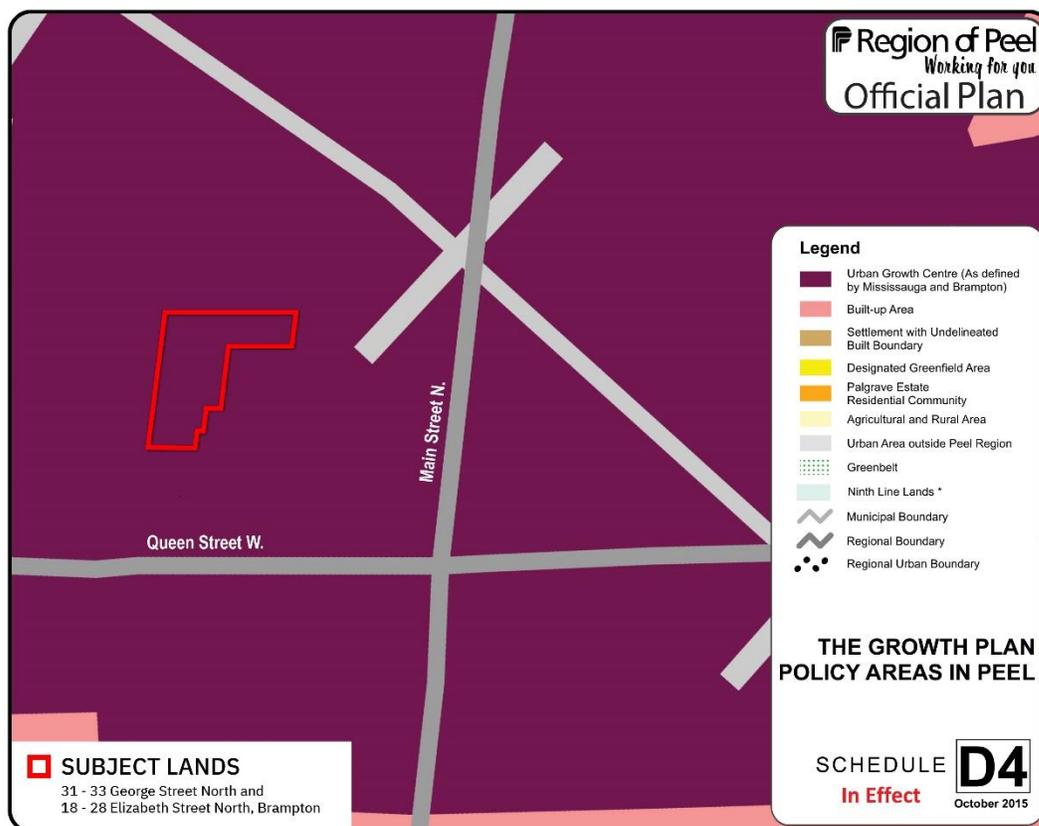
With respect to growth management, it is the policy of Regional Council to:

“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).

“Direct a significant portion of new growth to the built-up areas of the community through intensification” (Section 5.5.2.2)

The Subject Lands are within the *Urban Growth Centre* on Schedule D4: The Growth Plan Policy Areas in Peel, as shown in Figure 4.2, and within a Major Transit Station Area (“MTSA”) as defined by the Peel OP.

Figure 4.2: Peel Region Official Plan Schedule D4 - The Growth Plan Policy Areas in Peel



Source: Region of Peel (2016)

As per the Growth Management policies of the Peel OP, it is the objective of Regional Council to develop compact, transit-supportive communities and achieve a compatible and diverse mix of land uses that optimize existing infrastructure and services through intensification (Policies 5.5.3.1.1, 5.5.3.1.2, 5.5.3.1.4, 5.5.3.1.5, 5.5.3.1.6, and 5.5.3.1.8). Intensification is to be accommodated within urban growth centres and MTSA's

within the built-up area (Policy 5.5.3.2.3). In addition, 40% of all residential development in the Region of Peel is to be within the built-up area (Policy 5.5.3.2.4).

The proposed development will redevelop an underutilized site to provide a compact development comprised of a compatible mix of land uses within an Urban Growth Centre and an MTSA. This intensification within the built-up area will support the existing and planned transit infrastructure in the area and will contribute to the achievement of the intensification target.

4.3.3 Housing

The housing policies of the Peel OP emphasize the need to provide for an appropriate range and mix of housing types, densities, and sizes and to use land efficiently (Policies 5.8.1.1 and 5.8.1.3). The Peel OP also prioritizes housing for all income groups and the provision of affordable housing (Policies 5.8.1.2, 5.8.1.4, 5.8.3.1.1, and 5.8.3.2.11). Policy 5.8.1.4 also encourages the achievement of annual minimum new housing unit targets for the Region by tenure. These targets are currently 16% social housing, 3% affordable rental, 37% market rental and affordable ownership, and 44% market ownership in Brampton (Figure 17 – Annual Minimum New Housing Unit Target by Area Municipality).

The proposed development provides units with market rental and affordable rental tenures and contributes to achieving the Region's housing targets. Furthermore, the proposed development offers a range of unit sizes ranging from bachelor to three-bedroom suites.

4.3.4 Transit Area

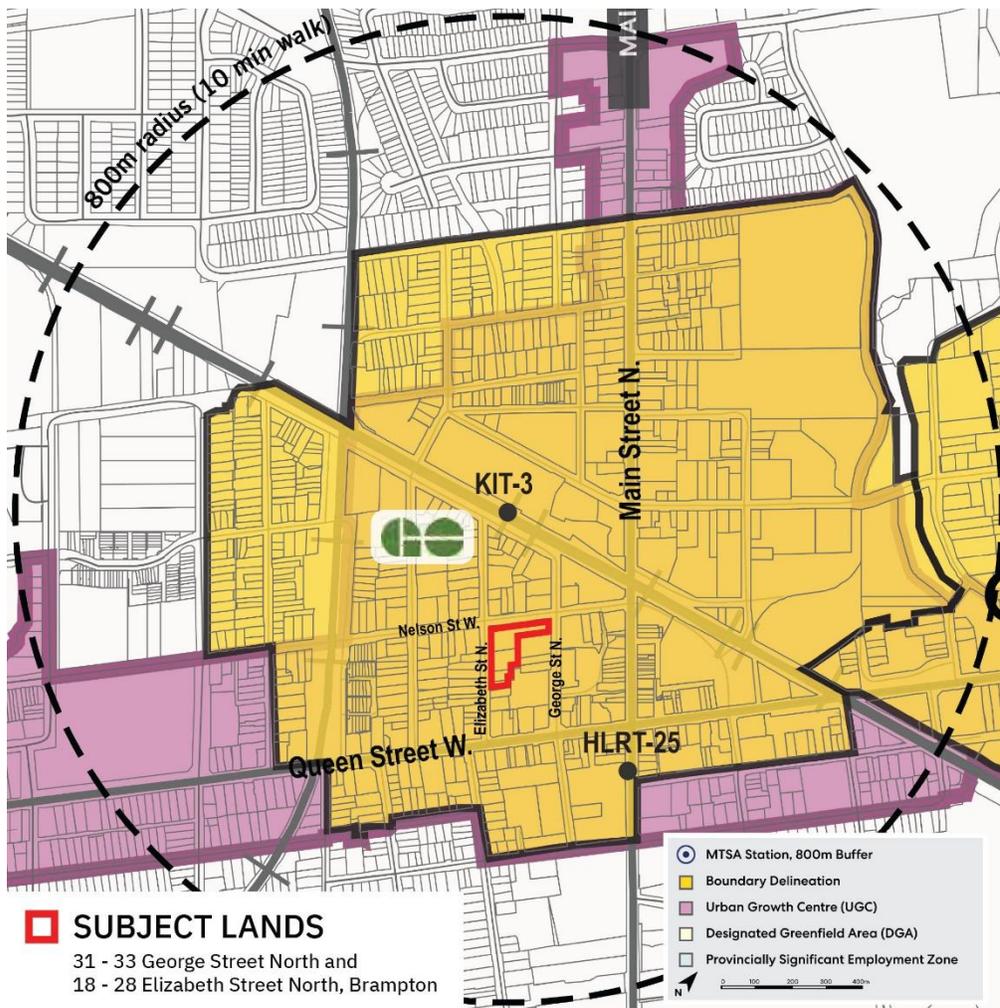
The Peel OP currently directs intensification to Major Transit Station Areas; however, it defers to the area municipality to identify and establish minimum density targets for Major Transit Station Areas ("MTSA") (Policies 5.5.3.2.3 and 5.5.3.2.8).

The Region of Peel is currently reviewing their Official Plan to bring its MTSA policies into conformity with the current Growth Plan. The Major Transit Station Area Study – MTSA Profiles Part 1, dated December 2020 ("MTSA Profiles"), includes a map of MTSA's, including an MTSA around the Brampton GO Station. It also identified the Main Street North and Queen Street West intersection as a potential station along the Hurontario Light Rail Transit ("LRT") line. The Subject Lands are within the boundary for the Brampton GO MTSA.

The MTSA Profiles provides an existing density calculation of 87 persons and jobs per hectare ("ppj/ha") for Brampton GO, which is well below the draft Peel OP minimum density of 200 ppj/ha. In order to achieve this minimum density target, significant intensification will be necessary. Specifically, the report identifies that an additional 10,366 persons and jobs are required to achieve the minimum density target of 200 ppj/ha. We note that the analysis sources 2016 Census data and other developments have been approved since 2016 which will contribute to the achievement of 200 ppj/ha.

As such, it is our opinion that the proposed high density development on the Subject Lands will contribute significantly to the achievement of the proposed 200 ppj/ha minimum density for the Brampton GO MTSA.

Figure 4.3: Boundary Delineation - Brampton GO MTSA



Source: Region of Peel (2020)

4.3.5 Heritage

As per Policy 3.6.2.8, development and site alteration is only permitted on adjacent lands to protected heritage properties where the proposed property has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.

As detailed in the Heritage Impact Assessment prepared by GBCA, the heritage property at 28 Elizabeth Street North will be conserved and restored in-situ. Haggertlea’s cultural heritage value will be maintained, and the proposed plaza will highlight the original entrance to the building.

4.4 City of Brampton Official Plan (September 2020 Office Consolidation)

The City of Brampton Official Plan (“Brampton OP”) was adopted by City Council in October 2006 and approved by the Ontario Municipal Board (“OMB”) in October 2008. The updated September 2020 Office Consolidation includes OMB decisions and LPAT decisions that have resolved several of the appeals to the 2006 Official Plan as well as amendments made to reflect Council decisions.

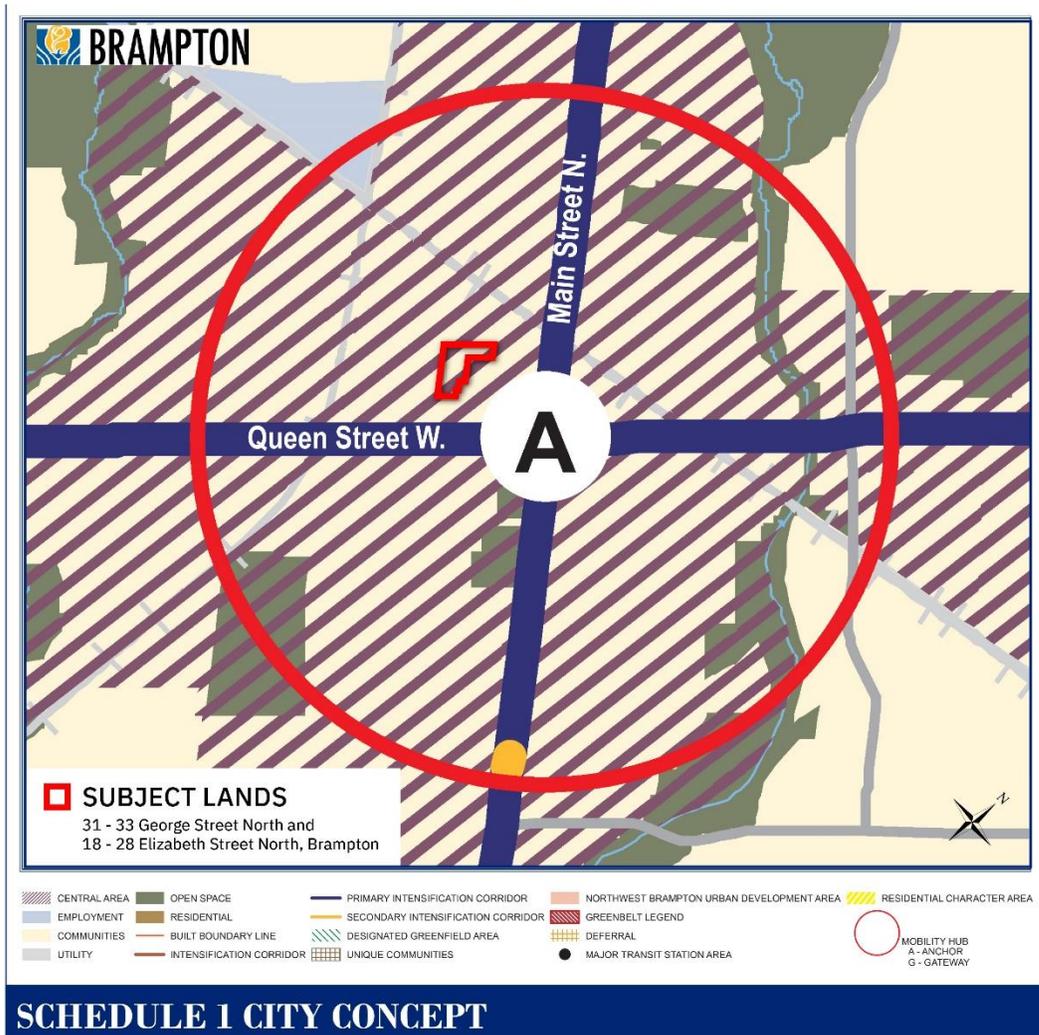
The Brampton OP sets out land use policy to guide development and infrastructure and to manage growth. It provides a policy framework for Council decisions regarding the use of land, the provision of the municipal services required to support growth, and the phasing of development. All planning decisions within the City of Brampton “shall conform with” the policies of the Brampton OP.

The pillars of the Brampton OP include developing modern transportation systems, managing growth, protecting the environment, sustaining a dynamic and prosperous economy, providing a community lifestyle, and providing excellence in local government (Section 2.4). These pillars will be implemented through Brampton OP’s sustainable city concept which promotes a holistic approach to planning (Section 3.0).

The Subject Lands are designated as “Central Area” and are within the “Anchor Mobility Hub” as per Schedule 1 – City Concept (see Figure 4.4), and Schedule A – General Land Use Designations. The Subject Lands are further identified as within the “Urban Growth Centre” as per Schedule 1A – Urban Growth Centre and are considered as within a “Major Transit Station Area” due to their proximity to the Downtown Brampton GO Station.

In general, the greatest mass and highest densities must be developed within the Urban Growth Centre and Central Area and within Mobility Hubs and Major Transit Station Areas (Policy 3.2.1.1). These areas shall accommodate a significant portion of population and employment growth, provide a diverse and compatible mix of land uses, support transit, walking and cycling for everyday activities, develop in a compact form that will efficiently uses land and resources, optimize the use of existing and new infrastructure and services, and achieve an appropriate transition of built form to adjacent areas (Policy 3.2.1.1 i), ii), iv), v), vi), and viii)). The highest intensity of new dwelling units should be focused in the Central Area, the Urban Growth Centre, Intensification Corridors, Mobility Hubs, and Major Transit Station Areas (Section 3.1). The Subject Lands are within an area that has a multi-layered policy context that the City of Brampton anticipates having the tallest and densest development.

Figure 4.4: Brampton Official Plan Schedule 1 - City Concept



Source: City of Brampton (2021), Malone Given Parsons (2021)

4.4.1 Central Area and Urban Growth Centre

The Central Area comprises the historic Downtown core and the area adjoining Queen Street Corridor, stretching from McLaughlin Road to Bramalea Road. Within Brampton, the Central Area is the major location for a number of important civic, institutional, cultural and entertainment facilities as well as major commercial, retail and employment activities and is home to a number of established neighbourhoods. (Section 3.2.3)

The Province has defined a significant portion of the Central Area as an Urban Growth Centre (“UGC”). UGCs are regionally significant and able to accommodate new population and employment growth; will function as vibrant meeting places; and will be home to cultural, public and institutional uses and major transit infrastructure. (Section 3.2.3)

The vision for the Central Area and Urban Growth Centre is to continue reinforcing its role as a focal area for investment in institutional and region-wide public services, as well as

commercial, recreation, cultural and entertainment uses. (Section 3.2.3) It is intended to be the primary location for a significant amount of housing and employment growth, including business, shopping, dining, entertainment, recreation and cultural uses, and significant transportation infrastructure (Policy 2.4.2(d) and Section 3.1). The Central Area, including the Urban Growth Centre functions as the heart of the City and embodies a broad range of high density uses (Section 3.2).

The Central Area, including the Urban Growth Centre, serves as the major location for free-standing or mixed-use development including a full range of office, retail, and service activities, a variety of residential uses, entertainment and cultural uses, institutional facilities and uses, a high density employment centre, and major transit infrastructure (Policy 4.1.2). Major offices, hotels, convention centres, and institutional uses are encouraged within the Central Area (Policy 4.1.3). The Urban Growth Centre is planned to achieve a minimum gross density target of 200 residents and jobs combined per hectare by 2031 or before (Policies 3.2.3.2 and 4.1.1). Development within the Urban Growth Centre shall generally be designed to achieve 4 storeys and greater (Policy 3.2.3.3). Opportunities to exceed the maximum height and/or density permitted within the Secondary Plan or Zoning By-law within the Central Area and Urban Growth Centre shall be considered subject to the provisions of Section 5.12 of the Brampton OP (Policy 3.2.3.4).

The proposed mixed-use development provides a range of high density uses, including residential, hotel, retail, and restaurant uses within walking distance to significant transportation infrastructure and public service facilities. The proposed development achieves a density of approximately 2,837 residents and jobs per hectare contributing to the Urban Growth Centre density target. The proposed development has a maximum height of 42 storeys (155.05 metres). While the proposed development is consistent with the height provisions in Policy 3.2.3.3, it exceeds the maximum height provisions of the Secondary Plan and Zoning By-law. That said, Section 5.12 of the Brampton OP outlines height and density bonusing provisions that would permit the increased height, as detailed in Section 4.4.7 of this report.

4.4.2 Major Transit Station Area

The intersection of Queen Street West and Main Street North is identified as a Major Transit Station Area (“MTSA”) on Schedule 1 of the Official Plan. MTSAs are areas around existing or planned higher order transit and are planned to accommodate a concentration of higher density residential and/or commercial, institutional or employment development around an existing or future higher order transit station. They will be planned to accommodate an appropriate mix of uses that support the role of the area as a transit station area and have a built form that is pedestrian-friendly and easily accessible by all modes of travel. (Section 3.2.4)

Development within MTSAs are intended to generally achieve 1.5 FSI over the entire MTSA within buildings 3 to 10 stories in height that result in a maximum density of approximately 100 units per net residential hectare (Policy 3.2.4.1). However,

development within MTSA's that are also located within the Central Area are not subject to the height and density policies of Policy 3.2.4.1. In essence, the greater height and density permissions afforded to the Central Area supersedes the height and density policies of the MTSA.

The proposed development provides a high-density mixed use development concept that achieves approximately 9.30 FSI and will contribute to an appropriate mix of uses to support the higher order transit intended for this area. As mentioned, in Section 4.4.1, the proposed development contributes to achieving the height and density provisions applicable to the area.

4.4.3 Anchor Mobility Hub

Mobility Hubs are generally places of connectivity where different modes of movement from walking, cycling, and higher-order transit intersect seamlessly (Section 3.2.5). The Metrolinx Regional Transportation Plan has designated the area around the Downtown GO station within Brampton's Urban Growth Centre as an Anchor Mobility Hub (Section 3.2.5.2).

The Anchor Mobility Hub is identified by Section 3.2.5.2 as a special mobility hub having strategic regional and interregional importance in its ability to anchor the regional transportation system providing interregional, regional and local transit connections to the City's UGC and other UGCs across the GTHA. The Anchor Hubs is prioritized for transit-supportive densities, uses and built form designed to foster a pedestrian-friendly environment (Section 3.2.5.2).

Queen Street West and Main Street North are Primary Intensification Corridors, which are higher-order transit corridors linking major destinations within and beyond the City. Primary Intensification Corridors are planned to accommodate intense mixed-use development at higher densities supported by the City's highest level of transit service.

Queen Street West and Main Street North are further identified as a Bus Rapid Transit ("BRT") Corridors, intended to provide high-frequency services (5 minutes or less at peak headways). The projected timeframe for BRT implementation is 5 to 10 years, according to the City of Brampton.

Within the Urban Growth Centre, the lands in the immediate vicinity of the Anchor Hub should be planned to accommodate the highest combined people and jobs per hectare (Policy 3.2.5.2.1). The current Anchor Hub policies plan for a floor space index of 4.0 over the entire Anchor Hub Area within buildings 4 to 25 storeys in height (Policy 3.2.5.2.2). Opportunities to exceed the maximum height and/or density within the Secondary Plan or Zoning By-law within the Anchor Hub shall be considered subject to the provisions of Section 5.12 of the Brampton OP (Policy 3.2.5.2.3).

The proposed development meets the intent of the Anchor Mobility Hub policies of the Brampton OP by providing a significant amount of people and jobs per hectare (2,837 ppj/ha) in the immediate vicinity of the Anchor Hub which contributes to the overall

density target for the area. While the proposed development is generally consistent with Section 3.2.5.2, it does exceed the maximum permitted height. As mentioned previously, Section 5.12 of the Brampton OP permits height and density bonusing, as detailed in Section 4.4.7 of this report.

4.4.4 Residential

The residential policies of the Brampton OP promote a range of housing types and densities (Policies 4.2.1.1 and 4.2.1.2). To accommodate this range of housing types and densities, the residential component of a mixed-use building may exceed 200 units per net hectare within the Urban Growth Centre, Central Area, Mobility Hubs, and Intensification Corridors provided that the City Structure objectives of Section 3.0 of the Brampton OP are met (Policy 4.2.1.8).

Section 4.2 of the Brampton OP also encourages the provision of rental housing and affordable housing. The City aims to maintain a minimum rental vacancy rate of 2% and as such, encourages the provision of rental housing in appropriate forms and locations by practical and realistic means (Policy 4.2.1.12). The City also encourages a balanced distribution of affordable housing and may prioritize applications for affordable housing in areas where little or no such housing exists (Policy 4.2.5.2). In addition, the City will give consideration to alternative development standards to facilitate housing affordability objectives in accordance with the principles of sustainability (Policy 4.2.5.5).

The Brampton OP defines affordable housing as adequate housing which is affordable to households of low, moderate, and middle incomes, defined as households within the lowest 60% of the income distribution for the housing market area and affordable housing includes all social housing (Section 5.2). This definition also references the Provincial Housing Policy Statement which defines affordable as:

- Annual housing costs, in either annual accommodation costs or rent, which do not exceed 30 percent of gross annual household income for low and moderate income households, or
- The purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area, or
- The rent is at or below the average market rent of a unit in the regional market area

The proposed development complies with the Section 3.0 City Structure objectives by providing mixed-use, transit-supportive intensification within the Central Area, an MTSA, and a Mobility Hub and contributing to the development of complete communities. The proposed development contributes to the diversity of the City's housing stock, contributes to achieving the City's target for new dwelling units, and responds to the low rental vacancy rate and lack of affordable housing in Brampton. The City of Brampton's rental vacancy rate was 1.3% in 2019 (City of Brampton, 2021) and Peel Region's rental condominium apartment vacancy rate in 2020 was 0.8% (Peel Region, 2021). The proposed development will provide 771 rental units, including a minimum of 40

affordable units (6 one-bedroom units, 20 two-bedroom units, and 14 three-bedroom units). The affordable units will have a maximum rental rate of 134% or lower of the median market rent (\$1,742 for 1-bedroom units, \$1,956 for 2-bedroom units, and \$2,124 for 3-bedroom units). It provides a mix of unit sizes ranging from bachelor to three-bedroom suites. Furthermore, the proposed development locates rental and affordable housing within walking distance to transit and within a major activity centre (Downtown Brampton Urban Growth Centre), where a range of human, civic, and entertainment services exist.

4.4.5 Commercial

Section 4.3 of the Brampton OP provides objectives and policies relating to commercial uses and identifies the Central Area and Urban Growth Centre as essential components of the City's commercial fabric and the primary location for a diverse range of commercial activity. Commercial uses are encouraged to locate in a manner that supports the principles of complete communities, contributes to place making, and is accessible by all modes of transportation, particularly by active transportation (Policies 4.3.b and 4.3.d). The City encourages human-scaled commercial development and a high standard of design in accordance with the design policies of Sections 4.6 and 4.11 of the Official Plan (Policies 4.3.1.2 and 4.3.1.5).

Mixed commercial-residential uses adjacent to residential areas shall give due regard to the minimization of environmental, noise, pollution, and visual impacts in accordance with Section 4.6 and 4.11 (Policy 4.3.1.3). In addition, the maximum density of mixed-use projects may be specified in the relevant Secondary Plan (Policy 4.3.1.6).

The proposed development provides various commercial uses, including retail, hotel, and restaurant uses in the Central Area and Urban Growth Centre. The mixed-use nature of the proposed development will contribute to the provision of a complete community by locating both residential and commercial uses in an area with significant transit infrastructure and a variety of public service facilities within walking distance. The proposed development will be designed as a landmark building in accordance with the design policies of Sections 4.6 and 4.11 of the Official Plan. In particular, the proposed development will provide active frontages, pedestrian connections, and bike parking to create an animated, well-used street and active transportation-supportive public and private realm.

The proposed development has been designed with stepbacks and podiums to provide an appropriate transition to the adjacent residential areas and to minimize the visual impacts. More detailed information regarding mitigation of environmental, noise, pollution, and visual impacts will be provided at the Site Plan approval stage. The Downtown Brampton Secondary Plan does not provide a maximum density specific to mixed use projects; however it does specify a floor space index of 3.5 for lands within the 'Four Corners' and the Office Node. As mentioned, a zoning by-law amendment will be required to permit the increased FSI being proposed in accordance with Section 5.12 of the Brampton OP.

4.4.6 Heritage

Section 4.10 of the Brampton OP prioritizes the retention, integration, and adaptive reuse of heritage resources. Significant heritage resources are to be designated as being of cultural heritage value or interest in accordance with the *Ontario Heritage Act* to ensure their effective protection (Policy 4.10.1.3). Heritage resources will be protected and conserved in accordance with the Standards and Guidelines for the Conservation of Historic Places in Canada, the Appleton Charter for the Protection and Enhancement of the Built Environment and other recognized heritage protocols and standards (Policy 4.10.1.8). As protection, maintenance, stabilization of existing cultural heritage attributes and features is prioritized, alteration, removal, or demolition of heritage attributes on designated heritage properties is to be avoided (Policies 4.10.1.8 and 4.10.1.9). A Heritage Impact Assessment is required for any proposed alteration, construction, or development involving or adjacent to a designated heritage resource (Policies 4.10.1.10 and 4.10.1.11). The City identifies on-site retention in the original use and integration with the new development and on-site retention in an adaptive re-use as its preferred methods of conservation (Policy 4.10.1.12). Policy 4.10.9.2(vi) allows the City to use density bonuses or the transfer of surplus density rights in exchange for conservation and heritage designation to assist heritage preservation.

28 Elizabeth Street is designated under Part IV of the *Ontario Heritage Act* for its design or physical value as a unique late 19th century Second Empire style structure. The historic mansion is also known as Haggertlea and was built around 1870 for John Haggert, Brampton's first mayor. In the 19th century, the property had extensively landscaped grounds.

The proposed development will retain Haggertlea in situ. Non-sympathetic extensions to the building will be removed and the exterior heritage fabric of the remaining building will be repaired and restored. Opportunities for restoration of lost heritage features will be explored where possible, including the recreation of the original tower and verandah. The landscape plan proposes a formal flower garden in reference to Brampton's history as the Flower City as well as the original extensively landscaped grounds. Additionally, a courtyard-type plaza will be provided between the proposed building and the heritage building to highlight the original entrance to the building. A Heritage Impact Assessment has been prepared by GBCA Architects to demonstrate how the heritage resource will be conserved and to recommend mitigation measures, as required.

4.4.7 Height and Density Bonusing

Section 5.12 of the Brampton OP allows for height and density bonusing under Section 37 of the *Planning Act*. Height and density bonusing may be exchanged for the following facilities, services and other matters:

- (i) *Road network, traffic or transit improvements;*
- (ii) *Superior architectural design;*
- (iii) *Streetscape improvements and gateway enhancements;*

- (iv) *Daycare facilities;*
- (v) *Recreation and other community service or open space facilities;*
- (vi) *Preservation of environmental features; and,*
- (vii) *Heritage conservation (Policy 5.12.3).*

Increased height and density cannot result in a scale or intensity of development that is inappropriate for the surrounding neighbourhood or exceed the capacity of available community and physical services within the area (Policy 5.12.2).

The proposed development will have superior architectural design and will conserve and restore Haggertlea (a designated heritage resource). The proposed plaza will highlight the grandeur of Haggertlea's original entrance. The proposed design which includes many stepbacks and podiums, ensures that the proposed development is appropriate in scale for the surrounding community. The design of the proposed development will create a landmark building within Brampton's Downtown Core.

From a planning policy standpoint, the intensity of development is appropriate as it is located within the Central Area, a provincially designated Urban Growth Centre, an Anchor Mobility Hub, and an MTSA which are the areas where the greatest heights and densities intended to be located according to the Peel OP and the Brampton OP. From a living experience standpoint, the Subject Lands are an ideal location for intensified uses due to its proximity to public transportation and the variety of entertainment, shopping, and employment uses within walking distance. As such, the proposed development qualifies for height and density bonusing under the Brampton OP and Section 37 of the *Planning Act*.

4.5 Downtown Brampton Secondary Plan (February 2019 Office Consolidation)

The Downtown Brampton Secondary Plan (Chapter 7 of the 1993 Official Plan) (the "Secondary Plan") was adopted by Council in 1997 and was most recently consolidated in February 2019. The Secondary Plan sets out the policy framework for the western anchor of the Brampton Central Area which functions as the major location for higher order uses in Brampton. The policies of the Secondary Plan are designed to supplement and refine those of the Official Plan, not to replace or repeat them (Section 3.0).

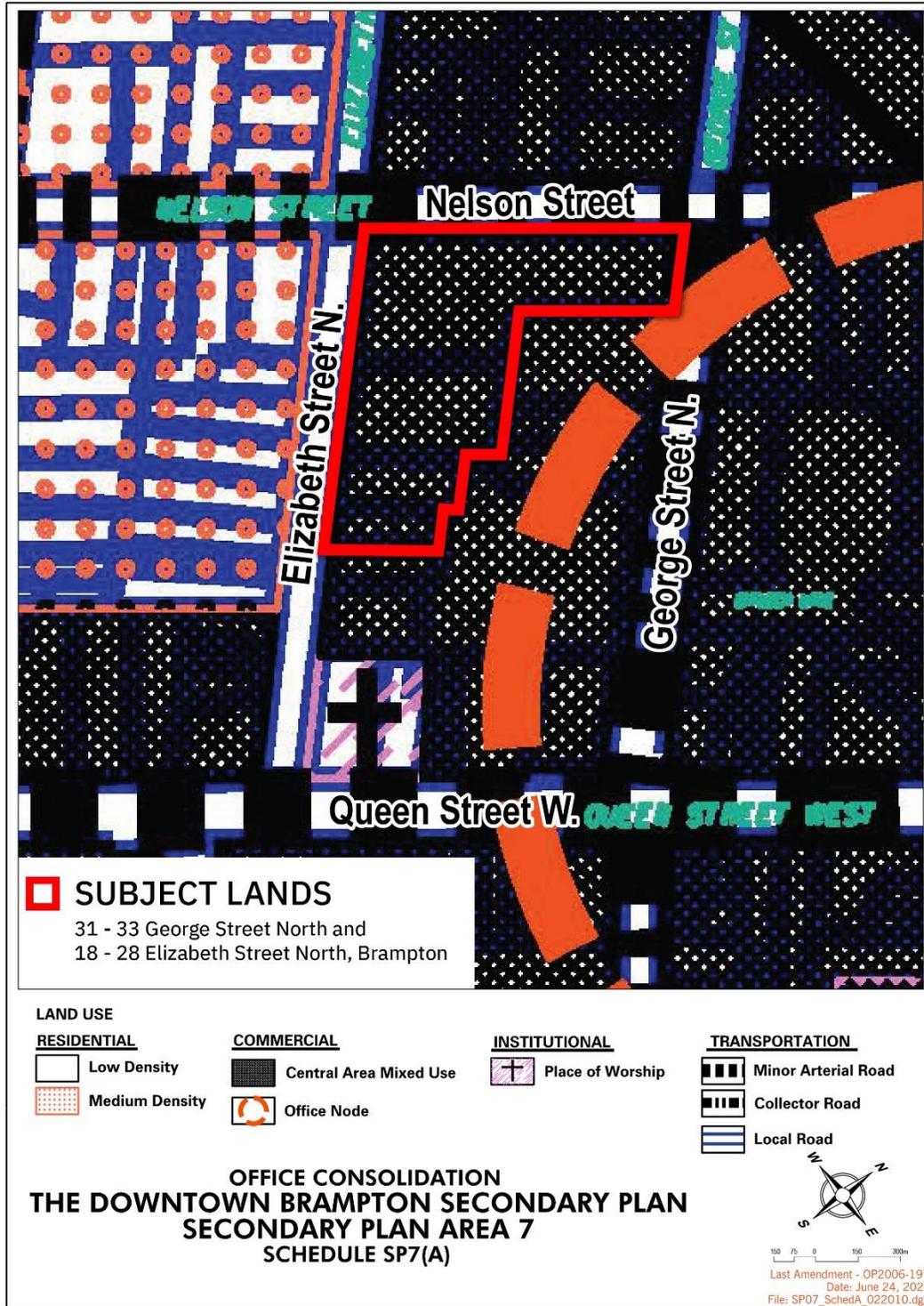
The Downtown Brampton Secondary Plan is envisioned as a mixed-use area that will function as an urban district where housing, shopping, community facilities and public spaces are mixed with work places, and office retail and residential uses are supported by public transit and improvements to the local road network (Section 1.0).

The general objectives of the Secondary Plan include promoting the intensification and improvement of the Central Area, promote an increase in the resident population within the downtown, provide for the identification, preservation and protection of heritage resources, ensure building height and massing of new development is compatible with adjacent residential and commercial areas, and promote land assembly to encourage

comprehensive redevelopment, among other things (Section 4.0).

The Subject Lands are designated “Central Area Mixed Use” and are partially within the Office Node, as shown on Schedule SP7(A) in Figure 4.5. The Subject Lands are also identified as “Special Policy Area No. 3” on Schedule SP7(C).

Figure 4.5: Downtown Brampton Secondary Plan – Schedule SP7(A)



Source: City of Brampton (2021), Malone Given Parsons (2021)

4.5.1 Central Area Mixed Use

Lands designated Central Area Mixed Use are intended to accommodate mixed-use developments incorporating any combination of commercial, retail, office, residential, hotel, open space, recreational, institutional, and a full range of entertainment and cultural uses (Policy 5.1.2.1). The highest overall densities in the Central Area Mixed Use designation are permitted in the area referred to as “The Four Corners”. This area is generally defined as extending from Elizabeth Street to the west, Union Street in the east, Wellington Street to the south and Church Street to the north. (Policy 5.1.2.3)

The Subject Lands are within “The Four Corners” area. As such the overall maximum Floor Space Index (“FSI”) permitted is 3.5, with a corresponding maximum of 3.5 FSI for residential uses. An increase beyond the maximum coverages require a site specific rezoning application as specified in Policy 5.1.1.5 of the Secondary Plan. (Policy 5.1.2.2)

The proposed development includes retail, residential, and hotel uses in accordance with the Central Area Mixed-Use designation. Further office and arts and culture uses are also being contemplated as components of the development concept. In accordance with Policy 5.1.2.2, a rezoning application is required to facilitate the proposed density, as detailed in Section 5.0 of this report.

4.5.2 Office Node

The Subject Lands are partially within the Office Node centered on the intersection of Main Street and Queen Street per Schedule SP7(A). The Office Node is intended to contain office development that is compatible with the local historic character of the area. Lands designated Central Mixed Use within the Office Node are to be developed to a maximum density of 3.5 FSI (Policy 5.1.3.1). Hotels and motels are also permitted within the Office Node (Policy 5.1.3.2).

The proposed development provides a hotel use on the portion of the Subject Lands within the Office Node. In addition, the structured parking on Level 1 is being designed to transition to office space should the demand arise. The hotel use and potential office use accommodated in the proposed development meet the intent of the Office Node policies of the Secondary Plan. While the proposed FSI is greater than the permitted 3.5 FSI, the Subject Lands are within an MTSA, a Mobility Hub, and the Urban Growth Centre which permit greater densities.

4.5.3 Special Policy Area Number 3

The Subject Lands are identified as Special Policy Area Number 3 on Schedule SP7(C) and more specifically Special Policy Area 3A on Schedule SP7(C2).

Special Policy Area 3 has been determined to be subject to flooding in a major storm event including the Regulatory Flood event (Section 5.6.3.1). As such, any new buildings or structures cannot be susceptible to flooding under the Regulatory Flood event and an analysis must be undertaken to determine the maximum feasible level of floodproofing

that can be achieved, while achieving the City's urban design objectives (Policy 5.6.3.2(ii)). New buildings or structures must be floodproofed to the highest level technically feasible, with the minimum floodproofing level being the 1:350 year storm event (Policy 5.6.3.2(iii)). Developments that would result in an unacceptable flood risk, as determined by the City and/or the Toronto and Region Conservation Authority, are not permitted (Policy 5.6.3.2(iv)).

Where new residential uses or hotels providing overnight accommodation are proposed, no residential habitable living space or suites for such uses shall be permitted below the Regulatory Flood level (Policy 5.6.3.2(v)). Proposed residential and hotel uses must provide emergency access/egress to and from the building to flood-free lands by way of a permanent right-of-way, not through more than two independent buildings (Policies 5.6.3.2(vi) and 5.6.3.2(vii)). Underground parking is generally discouraged and must be floodproofed where proposed (Policy 5.6.3.2 (xiii)).

Special Policy Area 3A is located at the edge of Special Policy Area 3, offering a prime location for direct access to flood-free lands in proximity to the Anchor Mobility Hub (Policy 5.6.3.3(a)). A mix of uses, including high-density residential are permitted (5.6.3.3(a)(i)). However, a maximum of 900 new residential units and a maximum gross floor area of 41,000 m² of non-residential uses over the entire Special Policy Area 3A are permitted; these limits cannot be exceeded (Policies 5.6.3.3(a)(ii), 5.6.3.3(a)(iii), and 5.6.3.3(a)(v)). Special Policy Area 3A also has specific urban design principles, as per Policy 5.6.3.3(a)(vi). These principles generally encourage a mix of uses at high densities and intensities and an active streetscape.

The proposed development will be floodproofed according to the policies of the Secondary Plan. The proposed residential units and hotel suites within Special Policy 3A are above the Regulatory Flood level as they are on Level 5 or higher as demonstrated in the Architectural Package, prepared by Sweeny & Co. Emergency access/egress to and from the building to flood-free lands is proposed through the building to Elizabeth Street. As the Subject Lands are not completely within Special Policy Area 3, there is direct access to flood-free lands within the proposed development. One level of underground parking is provided and will be appropriately floodproofed. All other parking will be provided aboveground.

The proposed development offers a more intensive development with a mix of uses and employs setbacks to ensure an appropriate transition to surrounding stable residential neighbourhoods. While more details about the building design will be determined at the Site Plan approval stage, the hotel lobby and retail uses will ensure an active streetscape and the lower level podiums will establish a continuous building wall along the public streets, with the towers creating an interesting skyline.

Based on our assessment of the buildings within Special Policy Area 3A, and as illustrated in Table 4.1, less than 20 residential units (if any) have been built since May 7, 2014 and only 595 units have been proposed. As such, the proposed 298 residential units proposed within Special Policy Area 3A do not exceed the maximum of 900 new residential units

within Special Policy Area 3A, as confirmed by City staff by email on August 8, 2019. Similarly, a total of 10,548 m² of non-residential uses is being proposed which is less than the maximum permitted by the Special Policy Area No. 3 policies.

Table 4.1: Residential Units Built After May 7, 2014

Address	Use	Year Built	Number of Units
9 George St	Residential	2011	N/A
80 Queen St	Commercial/Residential	Unknown	< 10
11 Church St	Residential	1992	N/A
24 Nelson St	Commercial/Residential	Unknown	< 10
25 Union St	Residential	Pre-2014	N/A
Northeast Corner Nelson St and Main St	Residential/Commercial	Proposed	595

Source: Google Maps (2021) and Malone Given Parsons (2021)

4.5.4 Heritage Resource Management

Heritage resources includes structures, sites, environments, and artifacts which are of historical, architectural and/or archaeological value, significance, or interest (Policy 8.5.2). The Secondary Plan encourages retaining and conserving buildings of architectural and/or historic merit on their original sites and integrating these resources into development plans (Policy 8.5.3). A cultural heritage resource assessment may be required when a development proposal could impact a heritage resource (Policy 8.5.4).

As mentioned, Haggertlea has been identified as a structure with architectural value and is designated under Part IV of the *Ontario Heritage Act*. The proposed development will retain and conserve Haggertlea by integrating it into the proposed development concept through a plaza that will highlight Haggertlea’s original entrance. A Heritage Impact Assessment has been prepared by GBCA Architects to demonstrate how the heritage resource will be conserved and to recommend mitigation measures, as required.

4.5.5 Housing

The Secondary Plan encourages a broad mix and range of residential unit sizes and built form suitable for moderate and lower income households (Policy 5.2.5.1). The proposed development provides units ranging from bachelor to three-bedrooms and includes a minimum of 40 affordable units. The unit mix for the affordable rental units will be a combination of:

- 6 one-bedroom units;
- 20 two-bedroom units; and
- 14 three-bedroom units.

Affordable rental units in this case are defined as units where the maximum rental rate is 134% or lower of the median market rent within the municipality as reported annually by the Canada Mortgage and Housing Corporation (CMHC). In the case of the Region of Peel, the affordable rental rates for 2021 are:

- \$1,742 for 1-bedroom units;
- \$1,956 for 2-bedroom units; and
- \$2,124 for 3-bedroom units.

As mentioned, the development is proposing a minimum of 40 affordable rental units. The applicant is continuing to explore opportunities to provide an additional 30-40 affordable rental units within the project.

4.5.6 Parking

The City encourages less stringent parking standards in the Downtown Area to facilitate commercial, residential, and mixed-use development and redevelopment, based on the current supply of parking spaces, the existence of non-auto facilities, and the proposed improvements to those facilities as detailed in the Secondary Plan (Policy 6.6.1).

The Subject Lands are located within walking distance of the Brampton GO Station, the Downtown Brampton Bus Terminal, several bus stops and the future Hurontario LRT stop at Queen and Wellington. The location also provides access to human services and amenities within walking distance. In addition, 530 bicycle parking spaces are provided as part of the development concept. The proximity to transit, walkability of the area and facilitation for active transportation will supplement the proposed parking to ensure that a variety of modes of transportation are accommodated.

4.6 Zoning By-law 270-2004

The Subject Lands are zoned Downtown Commercial One (DC1) and Residential Extended One Zone (R2B(1)) under Zoning By-law 270-2004, as shown in Figure 4.6.

The DC1 zone permits a range of commercial uses including retail, office, and hotel uses. The DC1 zone also permits an apartment dwelling, provided that the portion of the floor area within the first storey within 6.0 metres of the streetline is used for commercial purposes and provided that no more than 30% of the wall facing the street line is occupied by entrances or lobbies. A place of worship and uses accessory to the other permitted purposes are also permitted in the DC1 zone. The R2B(1) zone permits a range of low-density residential uses, a place of worship, and purposes accessory to the other permitted purposes.

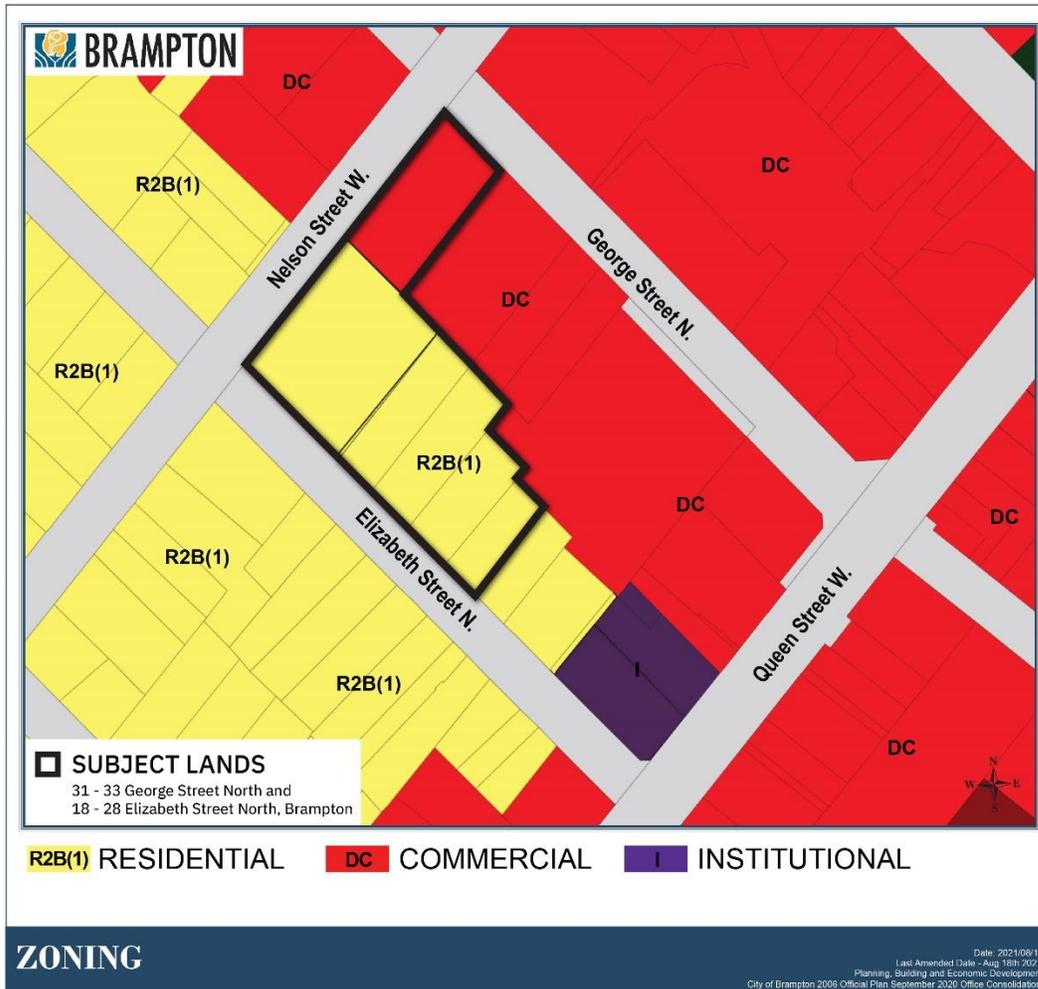
As per By-law 45-2021 which amended Zoning By-law 270-2004, no minimum parking standards are required in the Central Area for the proposed uses, save for visitor parking (0.20 visitor spaces per apartment dwelling unit) and bike parking (0.50 spaces and 0.1

visitor spaces per apartment dwelling unit). The proposed development is consistent with the visitor and bike parking standards by providing 151 visitor parking spaces and 530 bike parking spaces.

The applicable site standards are summarized in Table 4.2 and

Table 4.3.

Figure 4.6: City of Brampton Zoning By-law 270-2004



Source: City of Brampton (2021), Malone Given Parsons (2021)

Table 4.2: Applicable DC1 Site Standards Zoning By-law 270-2004

	Specifications	DC1
A	Minimum Street Line Setback	0 metres, except as shown on Schedule B-2 to this By-law, plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade 4.0 metre streetline setback from George St
B	Maximum Streetline Setbacks	As shown on Schedule B-1 to this By-law.

		A wall that has a length that is equal to or greater than 80% of the length of the lot line it faces is required on any lot adjacent to a streetline shown as being subject to Condition 'A'. Such a wall shall be located no further than 1.0 metre from the streetline or the minimum setback required from the centre-line of a street as shown on Schedule 'B-2' to this By-law. This provision - shall only apply to that portion of the wall that has a height of 15 metres or less above grade.
C	Minimum Interior Side Yard Width	<p>(i) Where the interior side lot line abuts a Commercial Zone – 0.0 metres plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade.</p> <p>(ii) Where the interior side lot line abuts a zone other than a Commercial Zone – 1.5 metres plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade or except as shown on Schedule B-4 to this By-law.</p>
D	Minimum Rear Yard Depth	6.0 metres, except as shown on Schedule B-4 of this By-law.
E	Windows and Doors at Grade	(i) On any wall adjacent to a streetline that is subject to Condition A on Schedule B-1, no less than 70% of the gross area of the portion of the wall that is less than 4.6 metres above grade shall have windows and/or doors.
F	Minimum and Maximum Building Height	<p>As shown on Schedule B-3 to this By-law. Minimum building height requirements shall only apply to that portion of the building that is within 12.0 metres of any streetline.</p> <p>From Schedule B-3: Minimum: 15.5 metres Maximum: 68.0 metres</p>
G	Articulated Roofs	The highest point of the roof on a building shall be a minimum of 2.0 metres higher than where a roof meets any exterior wall.

H	Rooftop Mechanical Equipment	Mechanical equipment on the roof of any building shall be located no less than 5 metres from any exterior wall on the building and occupy no more than 35% of the total area of the roof
I	Motor Vehicle Parking Provisions	The parking of motor vehicles on a lot is subject to the following provisions: (i) All motor vehicle parking on a lot shall be located within a parking garage. (ii) No portion of a parking garage that is above grade shall be located within an area that is above grade shall be located within an area that within 6.0 metres of any exterior wall adjacent to a streetline. (iii) Notwithstanding Section 28.2.3(i)(ii) above, no setback from any lot line is required for any portion of the parking garage that is below grade. (iv) No portion of a parking garage is permitted to be located any closer to an interior side or rear lot than any other building on a lot.
J	Special Setbacks for Residential Living Areas from Interior Side or Rear Lot Lines	Notwithstanding any other provision in the By-law, any portion of a building that is 15.0 metres or greater above grade having windows for a dwelling unit shall be located no less than 6.0 metres from an interior side or rear lot line.
K	Outdoor Display and Sales	The outdoor display and sale of goods is permitted as an accessory use provided the display area is accessible to the public and occupies no more than 25% of the gross floor area of the use it is accessory to.
L	Loading, Unloading and Waste Disposal	Loading, unloading and waste disposal facilities shall not be located on the wall facing a Residential Zone or a public road, nor shall be located in the yard adjacent to a Residential Zone or a public road
M	Garbage, Refuse and Waste	All garbage, refuse and waste containers for any use shall be located within a climate controlled area within the same building containing the use.

Table 4.3: Applicable R2B(1) Site Standards Zoning By-law 270-2004

	Specifications	R2B(1)
A	Minimum Lot Area	<p>Single detached Dwelling: interior lot: 450 square metres; corner lot: 550 square metres;</p> <p>Semi-detached Dwelling: interior lot: 540 square metres per lot and 270 square metres per dwelling unit; corner lot: 630 square metres per lot and 360 square metres for the dwelling unit closest to the flankage lot line;</p> <p>Duplex Dwelling: interior lot: 450 square metres; corner lot: 550 square metres;</p> <p>Triplex Dwelling: interior lot: 660 square metres; corner lot: 750 square metres;</p> <p>Double Duplex or Multiple residential Dwelling: interior lot: 925 square metres; corner lot: 1040 square metres;</p>
B	Minimum Lot Width	<p>Single detached Dwelling: interior lot: 15 metres; corner lot: 18 metres;</p> <p>Semi-detached Dwelling: interior lot: 18 metres per lot and 9 metres per dwelling unit; corner lot: 21 metres and 12 metres for the dwelling unit closest to the flankage lot line;</p> <p>Duplex Dwelling: interior lot: 15 metres; corner lot: 18 metres;</p> <p>Triplex Dwelling: interior lot: 18 metres; corner lot: 21 metres;</p> <p>Double Duplex or Multiple residential Dwelling: interior lot: 20 metres; corner lot: 22 metres;</p>
C	Minimum Lot Depth	30 metres
D	Minimum Front Yard Depth	6 metres
E	Minimum Interior Side Yard Width	1.2 metres for the first storey or part thereof, plus 0.6 metres for each additional storey or part thereof

F	Minimum Exterior Side Yard Width	3 metres
G	Minimum Rear Yard Depth	7.5 metres
H	Maximum Building Height	10.6 metres
I	Maximum Lot Coverage	No requirement
J	Minimum Landscaped Open Space	<ul style="list-style-type: none"> • Single Detached Dwelling: 60% of the minimum front yard area of an interior lot and 70% of the minimum front yard area of a corner lot, and 50% of the minimum front yard area of a lot where the side lot lines converge towards the front lot line • Other Dwelling: 50% of the minimum front yard area of an interior lot and 60% of the Page 3 of 3 minimum front yard area of a corner lot, and 40% of the minimum front yard area of a lot where the side lot lines converge towards the front lot line

An amendment to the Zoning By-law will be required to rezone all the Subject Lands as Downtown Commercial One (DC1) zone with site-specific provisions. The details of the Zoning By-law Amendment are provided in Section 5.0 of this report.

5.0

Proposed Zoning Bylaw Amendment

The Subject Lands are zoned Downtown Commercial One (DC1) and Residential Extended One Zone (R2B(1)) under Zoning By-law 270-2004. A Zoning By-law Amendment (“ZBA”) is required to permit the development as proposed.

Specifically, an amendment is required to rezone the Subject Lands to Downtown Commercial One (DC1) with site-specific exceptions.

The proposed site-specific amendment to Zoning By-law 270-2004 are outlined in Table 5.1. A draft of the ZBA is submitted as part of the application package.

Table 5.1: Proposed Site-Specific Zoning By-law Amendment

Zoning By-law 270-2004	Requested Amendment
Definitions	
<p><i>Section 5.0</i></p> <p>FLOOR AREA, GROSS RESIDENTIAL shall mean the aggregate of the area of all floors in a building, whether at, above, or below established grade, measured from the exterior of the outside walls, but excluding any porch, verandah, unfinished attic, basement or any floor area used for building maintenance or service equipment, loading area, common laundry facilities, common washroom, common children’s play area, recreation area, parking of motor vehicles, or storage.</p> <p>GRADE, ESTABLISHED shall mean the average finished surface elevation at the outside walls of any building or structure, which is determined by taking the arithmetic mean of the levels of the finished ground surface at the midpoint of each of</p>	<p>Notwithstanding the provisions of Section 5.0, the following definitions shall apply:</p> <p>FLOOR AREA, GROSS RESIDENTIAL shall mean the aggregate of the area of all floors in a building, whether at, above, or below established grade, measured from the exterior of the outside walls, but excluding any porch, verandah, unfinished attic, basement or any floor area used for building maintenance or service equipment, stairwells or elevators, loading areas, common laundry facilities, common washrooms, common children’s play area, recreation area, parking of motor vehicles, or storage.</p> <p>GRADE, ESTABLISHED shall be 211.75 metres.</p>

Zoning By-law 270-2004	Requested Amendment
<p>those outside walls.</p> <p>LOT LINE, FRONT shall mean the line that divides a lot from the street, provided that in a case of a corner lot, the shorter lot line that abuts a street shall be deemed to be the front lot line and the longer lot line that abuts a street shall be deemed to be the flankage lot line.</p> <p>RESTAURANT, DINING ROOM shall mean a building or place having eleven (11) seats or more where food and drink are prepared and offered for sale to the public for consumption either on or off the premises, and does not include a drive-through facility or window.</p> <p>COMMUNITY CENTRE shall mean a building or place used for community activities of a social, cultural or recreational character and operated on a non-profit basis.</p>	<p>LOT LINE, FRONT shall be the lot line abutting George Street North.</p> <p>RESTAURANT, DINING ROOM shall mean a building or place where food and drink are prepared and offered for sale to the public for consumption either on or off the premises, and does not include a drive-through facility or window.</p> <p>COMMUNITY CENTRE shall mean a building or place used for community activities of a social, cultural or recreational character and may be operated on a non-profit basis.</p>
General Provisions	
<p><i>Section 6.13</i></p> <p>Every part of any yard required by this by-law shall be open and unobstructed by any building or structure from the ground to the sky except by:</p> <ul style="list-style-type: none"> a) an accessory building or structure permitted by the provisions of this by-law; b) the structures listed in Table 6.13.A which may project into the minimum yards indicated for the distances specified; c) drop awnings, clothes poles, flag poles, garden trellises, fences, retaining walls, signs, landscaped decks or similar accessory uses. 	<p>Notwithstanding the provisions of Section 6.13, balconies, architectural features, parapets, signage, canopies, antennas, and railings are permitted to project 1.5 metres into any minimum yard.</p>
Uses	

Zoning By-law 270-2004	Requested Amendment
<p><i>Section 28.2.1.(b)</i></p> <p>Residential Use:</p> <p>an apartment dwelling, provided that the portion of the floor area within the first storey within 6.0 metres of the streetline is used for commercial purposes.</p> <p>Notwithstanding the above, entrances and lobbies associated in the area provided that no more than 30% of the wall facing the street line is occupied by entrances or lobbies.</p>	<p>Shall only be used for the following purposes:</p> <ul style="list-style-type: none"> i) The commercial uses permitted under 28.2.1(a), including a retail establishment, a grocery store or supermarket, a service shop, a personal service shop, a bank, trust company, or financial company, an office, a dry cleaning and laundry distribution station, a laundromat, a parking lot, a dining room restaurant, a convenience restaurant, or a takeout restaurant, a printing or copying establishment, a commercial school, a temporary open air market, a place of commercial recreation, a community club, a health or fitness centre, a theatre, an art gallery or studio, a hotel or motel, an animal hospital, or an administrative office of any public authority. ii) A community centre iii) An apartment dwelling iv) The other uses permitted under 28.2.1(c), including a place of worship and purposes accessory to the other permitted purposes
Requirements and Restrictions	
<p><i>Section 28.2.3</i></p>	<p>Notwithstanding the provisions of Section 28.2.3, the lands subject to this by-law shall only be subject to the following requirements and restrictions:</p>
<p>Minimum Streetline Setback</p> <p>0 metres, except as shown on Schedule B-2 to this By-law, plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade</p>	<p>Minimum Front Yard (George St N) Setback: 0.0m</p> <p>Minimum Exterior Side Yard (Nelson St) Setback: 0.3m</p> <p>Minimum Flankage Yard (Elizabeth St N) Setback: 3.0m</p>

Zoning By-law 270-2004	Requested Amendment
<p>Minimum Interior Side Yard Width</p> <p>(i) Where the interior side lot line abuts a Commercial Zone – 0.0 metres plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade.</p> <p>(ii) Where the interior side lot line abuts a zone other than a Commercial Zone – 1.5 metres plus an additional 3.0 metres from where the building is located at grade for that portion of the building that is 15.0 metres or greater above grade or except as shown on Schedule B-4 to this By-law.</p>	<p>Minimum Interior Side Yard:</p> <p>i) Where the interior side lot line abuts a Commercial Zone – 0.0 m</p> <p>ii) Where the interior side lot line abuts a zone other than a Commercial Zone – 1.5 m</p>
<p>Minimum and Maximum Building Height</p> <p>As shown on Schedule B-3 to this By-law. Minimum building height requirements shall only apply to that portion of the building that is within 12.0 metres of any streetline.</p>	<p>Maximum Building Height: 146.1 metres, excluding mechanical penthouses, architectural features, parapets, signage, canopies, antennas, and railings.</p>
<p>Rooftop Mechanical Equipment</p> <p>Mechanical equipment on the roof of any building shall be located no less than 5 metres from any exterior wall on the building and occupy no more than 35% of the total area of the roof</p>	<p>Rooftop Mechanical Equipment</p> <p>If mechanical equipment is not located within a screen or enclosed penthouse, then mechanical equipment shall be located no less than 5 metres from any exterior wall on the building and occupy no more than 35% of the total area of the roof</p>
<p>Motor Vehicle Parking Provisions</p> <p>The parking of motor vehicles on a lot is subject to the following provisions:</p> <p>a) All motor vehicle parking on a lot shall be located within a parking garage.</p> <p>b) (ii) No portion of a parking garage that is above grade shall be located within an area that is above grade shall be located within an area that within 6.0 metres of any exterior wall adjacent to a streetline.</p> <p>c) Notwithstanding Section 28.2.3(i)(ii)</p>	<p>Motor Vehicle Parking Provisions</p> <p>The parking of motor vehicles on a lot is subject to the following provisions:</p> <p>i) All motor vehicle parking on a lot shall be located within a parking garage.</p> <p>ii) No setback from any lot line is required for any portion of a parking garage that is below grade.</p> <p>iii) No portion of a parking garage is permitted to be located any closer to an interior side or rear lot than any</p>

Zoning By-law 270-2004	Requested Amendment
<p>above, no setback from any lot line is required for any portion of the parking garage that is below grade.</p> <p>d) No portion of a parking garage is permitted to be located any closer to an interior side or rear lot than any other building on a lot.</p>	<p>other building on a lot.</p>
<p>Outdoor Display and Sales</p> <p>The outdoor display and sale of goods is permitted as an accessory use provided the display area is accessible to the public and occupies no more than 25% of the gross floor area of the use it is accessory to.</p>	<p>Outdoor Display and Sales</p> <p>The outdoor display and sale of goods is permitted as an accessory use provided the display area is accessible to the public and occupies no more than 25% of the gross floor area of the use it is accessory to.</p>
<p>Loading, Unloading and Waste Disposal</p> <p>Loading, unloading and waste disposal facilities shall not be located on the wall facing a Residential Zone or a public road, nor shall be located in the yard adjacent to a Residential Zone or a public road.</p>	<p>Loading, Unloading and Waste Disposal</p> <p>Loading, unloading and waste disposal facilities shall not be located on the wall facing a Residential Zone or a public road, nor shall be located in the yard adjacent to a Residential Zone or a public road.</p>
<p>Garbage, Refuse and Waste</p> <p>All garbage, refuse and waste containers for any use shall be located within a climate controlled area within the same building containing the use.</p>	<p>Garbage, Refuse and Waste</p> <p>All garbage, refuse and waste containers for any use shall be located within a climate controlled area within the same building containing the use.</p>
	<p>There shall be no habitable space below the Regional Storm flood elevation.</p>
	<p>A designated emergency access (for residential and hotel uses) to the outside of the building shall be established at a minimum of the Regional storm flood elevation unless an emergency access is provided outside of the Regulatory Floodplain Limit.</p>
	<p>All buildings and structures shall be dry passively floodproofed to a minimum of the 1:350 year storm flood elevation, as of the date of enactment of this by-law, and as provided by the TRCA.</p>

The requested ZBA will allow for the development of the proposed mixed-use building with two towers, 42-storeys and 34-storeys, respectively. As demonstrated throughout this report, the proposed development is compatible with the surrounding community, consistent with the vision for the Central Area and Urban Growth Centre, and diversifies the housing stock available within the community to meet the needs of the population, including both market rental and affordable rental tenures. For the reasons stated above, it is our opinion that the requested ZBA is warranted and represents good planning.

6.0

Conclusion

This report is submitted to accompany the Zoning By-law Amendment request to permit the proposed uses, with site-specific exceptions on the Subject Lands.

The report has reviewed relevant Provincial, Regional, and local policies. It is our opinion that the proposed development is consistent with the PPS and conforms with the Growth Plan, Peel Region OP, and Brampton OP. It is our opinion that:

- The proposed development is consistent with the policies of the PPS. The proposed development accommodates growth within the built boundary of the settlement area, at a transit-supportive density, in a location where existing and planned transit and active transportation facilities are located. Further, the proposed development will diversify the housing stock in the City and Region, providing market rental and affordable housing options to meet the needs of current and future populations, provides a private sector employment opportunity and conserves built heritage resources.
- The proposed development conforms with the policies of the Provincial Growth Plan. The proposed development provides a transit-supportive intensification opportunity within an Urban Growth Centre and MTSA. It utilizes existing infrastructure, diversifies the housing stock, offering a rental housing type with market rental and affordable rental options, proposes development in a compact built form proximal to a range and mix of land uses with access to a range of transportation options. Further, the proposed development contributes to creating sense of place through the conservation of Haggertlea, a property designated under the *Ontario Heritage Act*.
- The proposed development conforms with the Peel Region OP policies. It provides a compact mixed-use development which contributes to the current minimum density requirement of 100 residents and jobs per hectare within Major Transit Station Areas, as well as the contemplated 200 residents and jobs per hectare density for the Brampton GO MTSA as part of the Region of Peel MTSA Study. It provides intensification on an underutilized site in the MTSA and Urban Growth Centre which are intended to contain higher intensity, transit-supportive developments with a mix of land uses.

- The proposed development also aids the Region of Peel in meeting its population growth forecast (727,000 residents in Brampton by 2031) by providing 771 units (approximately 1,496 residents). In addition, the proposed development will provide a minimum of 40 affordable rental units with potential to provide an additional 30-40 affordable rental units, which will contribute to achieving the Region's new housing targets.
- The proposed development conforms with the policies of the Brampton OP by proposing a compact and dense mixed-use building at a transit-supportive density in the Central Area, the Urban Growth Centre, the Anchor Mobility Hub, and an MTSA, all of which are locations where growth and intensification are to be focused and the greatest heights, densities and mix of uses are to occur. The proposed development supports the achievement of complete communities as it is accessible to a range and mix of land uses, including convenient access to community amenities, human services and mobility options.
- The proposed development contributes to the diversity of the City's housing stock and responds to demographic trend changes indicating an increased average household size and a lack of rental and affordable housing. The proposed development provides 771 rental units, of which a minimum of 40 are affordable rental housing and the remainder are market rentals. Consistent with the priorities of Housing Brampton, these units are located proximal to a range of existing and planned public transit options.
- Consistent with the policies of the Brampton OP, the proposed development provides market rental and affordable housing options which contribute to the City's housing targets, offers a range and mix of unit sizes and adds residential uses to the Central Area, the Urban Growth Centre, the Anchor Mobility Hub, and an MTSA proximal to transit and a major activity centre which offers a range of human services.
- The proposed development will locate residential, retail, restaurant, and hotel uses in the Central Area, the Urban Growth Centre, the Anchor Mobility Hub, and an MTSA which are all areas that encourage a mix of uses and are intended to accommodate a significant portion of both population and employment growth. Further, the proposed development has been planned to transition a portion of the parking structure for office space should the demand for additional office space in the Central Area arise.
- The designated heritage property at 28 Elizabeth Street North is proposed to be conserved and fully restored in-situ. Haggertlea will be incorporated into the proposed development through an outdoor plaza and will be a focal point of the Elizabeth Street North and Nelson Street intersection.

- The increased height and density of the proposed development will aid the City in achieving its vision for the Central Area, the Urban Growth Centre, the Anchor Mobility Hub, and the Brampton GO MTSA by focusing the intensification of population and employment in close proximity to transit and other services in the heart of the City.

For these reasons, it is our opinion that the mixed-use rental apartment building is consistent with or conforms to, as the case may be, relevant policy, represents good planning and should be approved.



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