



December 23, 2022

335-19

Via Email

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

Provincial Land Use Plans Branch
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
growthplanning@ontario.ca
c/o minister.mah@ontario.ca

**RE: MTSA Designation - Request for Changes to the Growth Plan
ERO No. 019-6177**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) provides expert land use planning advice and assists proponents secure the required municipal approvals for a variety of development projects throughout southern Ontario and would like to thank you for the opportunity to comment on the proposed amendment to A Place to Grow; Growth Plan for the Greater Golden Horseshow (Growth Plan) via ERO No. 019-6177. We represent the landowner of the property municipally known as 122-130 Main Street North, 6 & 7 Nelson Street East and 7 & 11 Church Street East, Brampton, which is located approximately 200.0 metres from the Brampton GO Station at 27 Church Street West.

As the Province works to address the housing crisis currently facing Ontario, it will become even more critical for Major Transit Station Areas (MTSAs) to achieve their role as strategic growth areas to be the focus of higher densities and intensification across the various regions of the Greater Golden Horseshoe. Given their connectivity within and across municipalities, MTSAs are strong candidates for the high density mixed use development to facilitate the creation of complete, transit-oriented communities.

The above-noted Main Street North property is currently within the 'Urban Growth Centre' and 'Primary Major Transit Station Area' in the Region of Peel Official Plan. Further, it is designated as 'Central Area' in the City of Brampton Official Plan and 'Central Area Mixed Use' in the Downtown Brampton Secondary Plan. The purpose of this submission is to provide comment and recommendations with regards to the Major Transit Station Area (MTSA) population target policies within the Growth Plan as they relate to the City of Brampton and Greater Golden Horseshoe.

Section 5.6.19.6 of the Region of Peel Official Plan prescribes density targets for specific MTSAs in the region, with 200 units per hectare set as the minimum density target for the Brampton GO MTSA. The City of Brampton Official plan establishes a minimum density of approximately 100 units per net residential hectare for MTSAs as per Policy 3.2.4.1. While Section 5.6.3.3.(a) of the Downtown Brampton Secondary

Plan notes that lands within Special Policy Area 3A shall only be developed to a maximum of 900 additional residential units.

Major Transit Station Areas

As stated in Section 2.1 of the Growth Plan, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas including urban growth centres and MTSAs. Development in these areas provide a focus on investment in transit as well as other infrastructure to support forecasted growth and a diverse range and mix of housing options. In Section 2.2.4.3 of the Growth Plan, MTSAs are prescribed to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. This intensification target is insufficient given the anticipated scale of development in MTSAs.

Development concepts which surround a major regional transit station typically result in much higher densities than what is currently considered by the Growth Plan and the corresponding Official Plans discussed above. The maximum permitted densities proposed for MTSAs within the Region of Peel and Brampton Official Plans are inadequate in order to achieve the objectives of the Province for complete, high density, transit-oriented communities. The densities prescribed by the Growth Plan need to exemplify the high-density development that is directed to those strategic growth areas of the Greater Golden Horseshoe like MTSAs. As an example, the Main Street North property discussed previously obtained approval from Brampton City Council for a site specific Zoning By-law Amendment in December of 2019. This site specific zoning permitted up to 590 residential units and a maximum building height of 29-storeys; equating to a residential density of approximately 678 units per hectare as-of-right. This density is more than triple the density targets established for the MTSA by the Growth Plan, the Region and the City. Increasing the prescribed densities for these areas in the Growth Plan would in turn improve the proposed densities for MTSAs in the Regional and Municipal Official Plans as they must conform with and implement the objectives of the Growth Plan. As such, it can be concluded that the Growth Plan's prescribed MTSA density of 150 residents and jobs per hectare should be increased to better align with the anticipated scale and density of development within a strategic growth area like an MTSA.

Given that a majority of regional and municipal growth will need to be directed to strategic growth areas like MTSAs, the prescribed rate of 150 residents and jobs per hectare established by Section 2.2.4.3 is in need of an increase to better represent the intensification needed to facilitate the targeted growth. As it is anticipated that many other sites will be developed and a majority of those sites located within the MTSA areas will contain high density development, it is clear that there is a disconnect between the provincial growth targets and those which will be constructed in reality.

Recommended Change to the Growth Plan

MTSAs require a consistent, suitable policy framework for the vital role they play in realizing the Province's intensification targets. Growth targets need to establish accurate unit predictions and regulations which align with true build-out scenarios. UrbanSolutions recommends the following change to the Growth Plan to achieve the vision for transit-oriented communities that MTSAs emphasize:

1. Modify Policy 2.2.4.3 to increase the proposed density target from 150 to 500 residents and jobs per hectare for Major Transit Station Areas served by the Go Transit rail network to accurately reflect the planned built form envisioned by the MTSA.

As proposed, the aforementioned change will strengthen the policy framework to provide clarity of implementation, ensure the goals and objectives of the MTSAs are realized and align with realistic growth and development outcomes. The balance of the Growth Plan contains the appropriate range of policies to protect the matters of provincial interest while also ensuring sufficient transportation and infrastructure requirements of any residential intensification development are secured.

Kind Regards,
UrbanSolutions



Matt Johnston, MCIP, RPP
Principal



Scott Beedie, MCIP, RPP
Planner

cc. Rose Garden Investments