APPENDIX #3

Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

October 23, 2023

GWD File: PN.92.242.00

The Corporation of the City of Brampton
2 Wellington Street West
Brampton, Ontario
L6Y 4R2

Attention: **Steve Ganesh, Commissioner, Planning, Building and Growth Management**
Henrik Zbogar, Director, City Planning & Design
Shannon Brooks-Gupta, Principal Planner, City Planning & Design

Subject: **Public Input – Letter of Concern**
Final Draft – Proposed 'Brampton Plan'
10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road, and 24 Bramalea Road
Lark Investments Inc.

Gagnon Walker Domes Ltd. ("GWD") and Delta Urban Inc. ("Delta Urban") acts as Planning Consultant to Lark Investments Inc. ("Lark"); the registered owner of the properties municipally known as 10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road and 24 Bramalea Road, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located within the Bramalea GO Station 'Primary' Major Transit Station Area ("MTSA").

Lark has put forward a vision to transform the subject site from existing low-order industrial uses towards a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/supportive and pedestrian friendly. In this regard, Council passed a resolution in support of a Minister's Zoning Order (MZO) on October 20, 2021, and again on December 8, 2021. The MZO was submitted to the Ministry of Municipal Affairs and Housing (MMAH) to support the proposed intensification and higher-order development of the subject site within the Bramalea GO 'Primary' MTSA. The MZO is currently at the Province for review.

In addition, Lark has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, Lark's participation in the Bramalea GO MTSA Focus Group Session that was hosted by City Staff on April 13, 2023, and through formal written correspondence prepared by Delta Urban and GWD on behalf of Lark to the City's Planning and Development Committee dated June 3, 2022, February 13, 2023, April 24, 2023, July 18, 2023, and August 28, 2023 (see **Appendix 1**).

Lark is also an Appellant of City of Brampton Official Plan Amendment OP2006-247.

We write to express Lark's continued concerns regarding the potential implications of the final draft of the new proposed City of Brampton Official Plan ("Draft Brampton Plan") policies on the subject site.

OVERVIEW of DRAFT BRAMPTON PLAN LAND USE DESIGNATIONS

The following are key designations and overlays of the Draft Brampton Plan that are proposed to apply to the subject site:

- Schedule 1 - City Structure:
  - *'Primary Major Transit Station Areas';*
  - *'Primary Urban Boulevards'* (Steeles Avenue East);
  - *'Secondary Urban Boulevards'* (*Bramalea Road);*
  - *'Town Centres'* Overlay
  - *'Employment Areas'.*

- Schedule 2 - Designations:
  - *'Mixed Use Employment'.*

- Schedule 13a– Brampton Major Transit Station Areas KIT-2 – Bramalea GO Land Use Plan:
  - *'Mixed Use (High-Rise Mixed-Use)';*
  - *'Mixed Use (Mid-Rise Mixed-Use)';*
  - *'Mixed Use Employment (Office Mixed-Use)';*
  - *'Proposed Public or Private Street Network';*
  - *'Special Policy Area';*
  - *'Neighbourhood Park'.*

ADDITIONAL CONCERNS REGARDING FINAL DRAFT BRAMPTON PLAN

GWD has reviewed the final Draft Brampton Plan on behalf of Lark. The concerns raised in previous correspondence (**Appendix 1**), continue to be raised through this submission to the City of Brampton. In addition, Lark has the following additional concerns as highlighted below:

- General overall comment – in many instances throughout the policy document, references to the Region of Peel have been deleted to reflect the upcoming dissolution of the Region of Peel. However, there are also instances where the reference to the Region of Peel has been left in, including in some cases requirements to seek a Regional Official Plan Amendment. We recommend that the Official Plan be revised to be consistent in referring to the Region of Peel.

- General overall comment – similar to the note above, in many policies through the Final Brampton Plan, references to the Natural Heritage System have been amended to remove the word 'Heritage'; however, there are many instances throughout the Final Brampton Plan, including on the Schedules thereto, where reference is made to the 'Natural Heritage System'. We recommend that the Official Plan be revised to be consistent in referring to the Natural Heritage System.

- General overall comment – in various policies (such as 2.2.3.11 j)), the policy language summarizes various performance standards that are to be regulated through a Zoning By-Law, including among others, materials. A Zoning By-Law is not permitted to regulate things like materials and colours. Recommend that the Official Plan be revised to remove reference to materials.

- Beginning on page 4-12 (Site and Area Specific Policies) as well as Policy 5.7, contain the Major Transit Station Area policies. Where comments in previous correspondence

have not been addressed in the Final Brampton Plan, our previous written comments (**Appendix 1**) continue to apply.

- Policy 2.1.2.7 refers to all development in conformity with the City-Wide Growth Management Framework, however, there is no section in the Final Brampton Plan under this heading, and no schedule includes this as a designation. It is not clear what this is referring to. We recommend that Staff clarify the intent of this policy.

- Previous comments on Policies 2.1.2.13 and 2.1.2.14 (previously 2.1.16 in earlier drafts of Brampton Plan) with regard to amending the word 'minimum' to 'target' have been made. However, Table 1 still refers to the growth forecasts as "minimum". We recommend that the title of Table 1 be amended to conform with the language of the policies.

- The wording of Policy 2.1.2.84 is not clear on how the limits of a Precinct Plan will be determined in the instances noted therein (i.e. where a Secondary Plan does not yet identify the location of Precincts).

- Policy 2.2.6.3 identifies permitted uses within the mixed-use designation, and more specifically, 2.2.6.3 d) speaks to missing middle housing options to support the transition between mixed-use and adjacent designations. The term 'missing middle' is not a defined term in the Brampton Plan, and as such it is not clear what this means. Recommend to delete, and keep the permitted uses that are referenced to the building typologies established in the Plan.

- Within Policy 3.1.2 – Complete Communities is the heading 'Community Hubs'. The policy describes Community Hubs as being, among others, "future-proof" public spaces. What is "future-proof"? In addition, "Community Hubs" are not identified on any Official Plan Schedule – where are they located, and when would these policies apply. We request that staff provide clarification to this policy.

- Policy 3.2.6.2 speaks to requiring 'Adaptation Checklist' for all planning and development activities to expected regional climate impacts. It is not clear what 'Adaptation Checklist' means and how does each planning and development activity supposed to understand or know the expected regional climate impacts. This policy is too vague and not clear in what is intended. We recommend that the policy either be revised to clarify what is intended or to delete the policy.

- Part 3.3 and more specifically, Policy 3.3.1.2 speaks to housing targets. While it is recognized that affordable housing, housing mix and rental housing are targets, to state that the City working with other levels of government will 'work to achieve' these targets is very onerous and not reflective of changing market conditions. We recommend that the policy be amended to provide flexibility in how these targets are achieved.

  Furthermore, it is our opinion that the housing targets are very optimistic and untenable. It is very difficult to achieve these targets given the current and anticipated future market conditions. We strongly recommend that these targets be reconsidered to reflect the reality of the market conditions and effective implementation. Without financial support and affordable housing development initiatives/investments from all levels of government, these targets, if maintained as is, are not achievable.

- Schedule 13a designates a portion of the subject site as Office Mixed-Use in the Bramalea GO Primary Major Transit Station Area. As noted in the prior correspondence contained in **Appendix 1**, we recommend that the portion of the subject site designated Office Mixed-Use be re-designated Mixed-Use (High-Rise Mixed-Use).

Closing Remarks

We understand that the Final Draft of Brampton Plan was released the week of September 18, 2023 for public review and comment. We note that while our office has been actively monitoring the Brampton Plan process and previously provided public input into this exercise, neither GWD nor our Client were immediately informed by the City that the Final Draft had been released at that time.

Further, we understand that certain critical Draft Brampton Plan Schedules which are intended to form part of Brampton Plan have not yet been released or included for public consultation. Notwithstanding, the City had requested that all public input on the Draft (as partially released) be received by October 2, 2023 in order to be considered as part of an upcoming final Staff Recommendation Report.

Respectfully, this commenting period of a mere two (2) weeks is inadequate given the magnitude and broadness of the scope of the planning exercise as it pertains not only to our Client, but also all other landowners and other stakeholders in the City of Brampton.

As noted above, we understand that the City's Planning Department intends to table a final Recommendation Report to Planning and Development Committee on October 23, 2023, that recommends that City Council adopt the Draft Brampton Plan at the November 1, 2023 Council Meeting. The aforementioned Recommendation Report, which was made available on October 16, 2023, provides the schedules omitted as noted above, which provides only one (1) week to comment; this too is an inadequate commenting period.

In the spirit of meaningful and appropriate consultation, we believe that City Planning Staff should extend the commenting period until November 2023 and defer the consideration of a final Recommendation Report thereto.

Thank you for the opportunity to provide public input. While our Client wishes to express its general support, they do have reservations and may provide further comments as necessary during the process.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner, Principal Planner

cc: Lark Investments Inc.
M. Ghassan, Delta Urban Inc.
S. D'Agostino, Thomson Rogers Barristers and Solicitors
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.

APPENDIX #1

June 3, 2022
Sent via email cityclerksoffice@brampton.ca

The Corporation of the City of Brampton
c/o City Clerk's Department
2 Wellington Street West
Brampton, ON
L6Y 4R2

Attention: **Mayor and Members of Council**

Re: **Lark Investments Inc.**
Review and Comment on the draft "Brampton Plan, the new Official Plan"
City of Brampton (the "City"), Region of Peel (the "Region")

Dear Mayor Patrick Brown and Members of Council,

We are writing to you on behalf of our Client Lark Investments Inc. (the "Client") with respect to lands located at the northwest corner of Bramalea Road and Steeles Avenue (the "Subject Lands"), as identified in the attached Ownership Plan (Schedule A). The Subject Lands are approximately 15 hectares in size and are known municipally as 10 and 26 Victoria Crescent; 376, 387 and 391 Orenda Road; and 24 Bramalea Road in the City of Brampton. The Subject Lands are located within the Bramalea GO Major Transit Station Area ("MTSA") boundary, and within the Bramalea Mobility Hub Secondary Plan Area. The objective of this letter is to provide our comments regarding the Draft Brampton Plan, the new City of Brampton Official Plan, which was released on April 26th, 2022, and is envisioned to be recommended for adoption at the July 6th, 2022 Council Meeting.

As Council is aware, our client put forward a vision (the "vision") to transform the Subject Lands from existing low-order industrial uses towards a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/supportive and pedestrian friendly. To advance the implementation of our client's vision, council passed a resolution in support of a Minister's Zoning Order (MZO) on October 20th, 2021 and again on December 8th, 2021. The MZO was submitted to the Ministry of Municipal Affairs and Housing (MMAH) to support the proposed intensification and higher-order development of the Client's lands being located within the Bramalea GO MTSA. The MZO is currently at the province for review and we look forward to its implementation in the near future.

Council endorsed the transformation of these lands from an existing low-density industrial space which is significantly under serving the community, into a vibrant high-density mixed-use complete community which is supported by transit. The Peel Regional Official Plan, as approved by Regional Council on April 28th, 2022, acknowledges the vision of Council and provides a policy framework to implement *flexible policies* for the Bramalea GO MTSA, to support residential and non-residential uses.

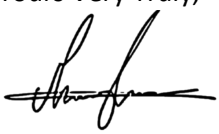
City of Brampton Draft Official Plan (the "Brampton OP")

Firstly, we would like to acknowledge the extensive work put in by staff to deliver the draft Brampton OP and commend staff in preparing such an extensive document promptly after the Regional Official Plan was approved by Regional Council. We are particularly gratified to see the draft Brampton OP reflect the residential mixed-use land use designations our client had envisioned for the Bramalea GO MTSA. However, we do have several concerns regarding the built form policies within the plan. We offer the following letter and supporting memo which underline our major concerns regarding the restrictiveness of the policy. This Brampton OP should reflect the vision which Council has already endorsed, which is one of a vibrant, transit-oriented, high-density mixed-use complete community.

Transforming the lands in the currently under-utilized Bramalea GO MTSA would assist in creating additional housing to assist in the growing housing crisis. While the current draft Brampton OP supports greater mixed-use/residential densities, it heavily restricts the level of density that can be accommodated within the Bramalea GO MTSA and it is currently not in-keeping with the Regional Official Plan and the vision that Council has endorsed. For instance, the Regional Official Plan does not restrict heights or densities but adds that Municipalities may include maximum building heights within a Secondary Plan. In our opinion, the current Draft Brampton Plan is far too restrictive and provides too much authority to guidelines, which are meant to establish design intent vs. prescriptive development criteria. We strongly believe that by restricting heights and densities in an area well-supported by Municipal, Regional, and provincial transit, the current draft Brampton OP will disservice and limit growth in the City of Brampton, as this site has significant potential for substantial residential and employment growth. Attached herein is a memo prepared by Bousfields Inc. which highlights key concerns regarding the urban design and built form policies.

We would like to again acknowledge the work the City of Brampton staff have done to develop the Draft Brampton Official Plan. We would welcome the opportunity to meet and discuss our concerns. Thank you for your time and consideration of our comments and proposed changes. Should you have any questions, please do not hesitate to contact the undersigned.

Yours Very Truly,



Mustafa Ghassan, BES, M.Eng
Delta Urban Inc.

cc. Andrew McNeill, Strategic Leader, Planning And Development Services Department, City of Brampton
Sajjad Ebrahim, Lark Investments Inc.
Michael Gagnon, Gagnon Walker Domes Ltd.
Liam England, Delta Urban Inc.
David Falletta, Bousfields Inc.

Enclosed. Schedule A - *Ownership Map*
Bousfileds Inc. Memo – Urban Design and Built Form Review of the Draft Brampton Plan

Appendix 1:
Ownership Map

Bramalea and Steeles Ownership Map

#	Ownership Legal Name	Area (ha)	Municipal Address
1	EBRAHIM INVESTMENTS INC.	1.076	10 Victoria Cres
2	LARK HOLDINGS #2 INC.	1.741	376 Orenda Rd
3	CP REIT ONTARIO PROPERTIES LIMITED	2.244	379 Orenda Rd
4	REICHHOLD INDUSTRIES LIMITED	2.200	383 Orenda Rd
5	2708110 ONTARIO INC.	0.811	380 Orenda Rd
6	2650549 ONTARIO INC.	0.484	15 Victoria Cres
7	1997243 ONTARIO INC.	0.589	19 Victoria Cres
8	EP 390 ORENDA INC.	3.156	390 Orenda Rd
9	EBRAHIM PROPERTIES INCORPORATED	6.069	387 & 391 Orenda Rd
10	2695214 ONTARIO INC	0.406	24 Bramalea Rd
11	THE REGIONAL MUNICIPALITY OF PEEL	0.210	40 Victoria Cres
12	2221472 ONTARIO INC.	1.007	394 Orenda Rd
13	1271929 ONTARIO INC.	0.500	30 Victoria Cres
14	AARK NOMINEE INC.	2.582	26 Victoria Cres
15	ONTARIO AND CENTRAL PROPERTIES INC.	0.405	60 Bramalea Rd
16	MITHU & SONS LTD.	0.318	58 Bramalea Rd
17	T-K PILON HOLDINGS CORPORATION	0.401	56 Bramalea Rd
18	THE CORPORATION OF THE TOWNSHIP OF CHINGUACOUSY	0.312	N/A
19	ALECTRA REAL ESTATE HOLDINGS INC.	0.145	398 Orenda Rd
20	GLOBE REALTY HOLDINGS LTD.	0.386	50 Bramalea Rd
21	ADMNS BRAMPTON INVESTMENT CORPORATION	7.999	15 Bramalea Rd,
22	B. KHAN INVESTMENTS INC.	0.534	41 Bramalea Rd
23	HENTOB INVESTMENTS LIMITED	0.564	45 Bramalea Rd,
24	BRAMPTON HARDWOOD FLOORS LTD.	1.014	59 Bramalea Rd,
25	ALPHA GROUP OF COMPANIES LTD	0.913	109 East Dr
26	69 BRAMALEA HOLDINGS LIMITED	0.771	69 Bramalea Rd
27	MAC MOR OF CANADA LTD.	1.499	75 Bramalea Rd
28	SANTOS HOLDCO INC.	0.570	106 East Dr
29	DEBROB INVESTMENTS LIMITED;	3.043	110 East Dr
30	2707193 ONTARIO INC.	3.549	109 East Dr
31	N/A	2.419	114 East Dr
32	TARO PHARMACEUTICALS INC.	1.622	126 East Dr
33	2538821 ONTARIO INC.	2.029	115 East Dr
34	PACCAR LEASING COMPANY, LTD.	0.943	119 East Dr
35	B. & C. PACKAGINGS LIMITED	1.291	125 East Dr
36	1534738 ONTARIO INC.	1.268	129 East Dr
37	7602928 CANADA INC.	1.238	131 East Dr
38	QBD INTERNATIONAL INC.	1.840	1810 Steeles Ave E
39	2153461 ONTARIO INC.	2.028	1940 Steeles Ave E,
40	TWO O SEVEN O LTD.	2.025	2070 Steeles Ave E
41	STEELTON BUSINESS CENTRE INC.	4.124	2084 Steeles Ave E
42	CANADIAN TIRE CORPORATION	0.108	2021 Steeles Ave E
43	CANADIAN TIRE CORPORATION	33.135	2111 Steeles Ave E
Approx. Total		99.570	
Lark Investment Inc.		**15.030**	

Lark Invesments Inc. Properties

Public Lands

Bramalea GO Preliminary MTSA Boundary

Parcel Boundary

DELTA URBAN

Date: June 22, 2021

Appendix 2:
Memo - Urban Design and Built Form
Review of the Draft Brampton Plan

BOUSFIELDS INC.

MEMORANDUM

To: Mustafa Ghassan, Delta Urban Project No.: 20125

From: David Falletta Date: May 31, 2022

Re: Urban Design and Built form Review of the Draft Brampton Official Plan, Dated April 2022

As requested, we have completed a detailed review of the recently released Draft Brampton Official Plan (the "**Draft OP**"). The following will outline some key policies related to the Lark Investments Inc.'s land holdings, generally at 376-391 Orenda Road and 26 Victoria Crescent in Brampton (the **"subject site**") and our recommendations. Our review is specifically related to the draft built form and urban design policies.

Key Draft Policies and our Response

Land Use

The subject site is located within a *Provincially Significant Employment Zone* (the "**PSEZ**") as defined by the Growth Plan. However, Policy 2.2.5.9 states that the conversion of lands within *employment areas* to non-employment uses may be permitted through a municipal comprehensive review, subject to certain criteria. In this regard, the Region of Peel (the "**Region**") has added a flexible policy (Policy 5.8.36) to the subject site (and entire Bramlea GO Major Transit Station Area) retail, residential, commercial, and non-ancillary uses within the Bramlea GO MTSA, which is designated as an *employment area*. The Draft OP designates the subject site *Employment, Town Centres, Primary MTSA,* and *PSEZ.*

Response: In our opinion, the Draft OP should implement the Draft Regional Official Plan (the "**Draft ROP**") and provide a similar policy framework for the Bramlea GO MTSA that specifically recognizes its ability to accommodate non-employment uses. This will ensure conformity with the Growth Plan and ensure the policy goal of providing a mix of uses on the subject site and entire Bramlea GO MTSA. More specifically, the policies in sections 2.2.126-2.2.130 should apply to the subject site and Bramlea GO MTSA.

MTSA Policies

Policy 3.1.66 of the Draft OP states that the City will undertake a detailed comprehensive planning study for each of the designated *Primary MTSA*'s, which will result in a secondary plan policy framework and address certain criteria identified in the policy.

Response: In general, we are supportive of these MTSA policies, subject to inclusion of additional policies as identified above specifically for the Bramlea GO MTSA. More specifically, we are supportive of the wording in criteria 3.1.66.d which states that the secondary plan will establish the minimum **and if required,** maximum heights and FSI for each block within the MTSA. In our opinion, given the policy framework that seeks to optimize density within strategic growth areas, including MTSA's, it is our opinion that the ultimate secondary plan should provide flexibility in maximum height and density. In our opinion, Policy 3.1.66 should create a timeline for when the secondary plan must be complete in order to avoid a delay in the development of City's MTSA or alternatively allow for owners or groups of owners to complete a secondary plan process for some or all of the MTSA, subject to an approved terms of reference by the City.

Framework for Building Typologies

Table 4 of the Draft OP summarizes the range of built form typologies permitted within each designation and overlay. In this regard, the subject site falls within a Mixed-Use District (MTSA) and Town Centre, which are identified as a "Low-Rise" typology for the Mixed-Use District and "Low-Rise Plus, Mid-Rise" for the Town Centre. Additional permissions are also identified and the Draft OP states that MTSA studies may identify appropriate locations for Low-Rise Plus, Mid-Rise and Tall Buildings. Town Centres include additional permissions for Tall Buildings subject to a precinct plan and being located within an MTSA. Furthermore, Tall Plus buildings are only permitted in Urban Centres through additional permissions.

Response: In our opinion, Table 4 is overly restrictive and does not fully implement the Growth Plan and the growth management policies of the Draft ROP and Draft OP, which seek to optimize density in *strategic growth areas* and MTSA's, which are well served by public infrastructure and especially public transit. Furthermore, the Draft ROP does not include any building height or density maximums, instead it states that municipalities **may** include maximum building heights as part of Secondary Plans. Overall, in a provincial and regional planning policy framework that requires the optimization of land and development in *strategic growth areas* and MTSA's, which is the case for the subject site, it is our opinion that prescribing maximum building heights does not conform to the PPS, Growth Plan and Draft ROP. We recommend a request to revise Table 4 to permit all forms of building

typologies subject to detailed study and compatibility with existing and planned surrounding uses. If there is a desire to direct the tallest buildings to designated "Urban Centres", the policy framework should state this. It is our opinion that the Draft OP is overly prescriptive and should provide more flexibility. In this regard, the Draft OP should not provide a rigid maximum building height of 25 storeys in Mixed-Use Districts and Town Centres.

Primary & Secondary Boulevards

In our opinion, Policy 2.2.29 is concerning since it identifies considerations related to the evaluation to height and built form. Specifically, identifying "visual impacts on the Natural Heritage System" is concerning, since it does not identify how or what criteria would be used to address it.

In our opinion, Policy 2.2.32 is overly prescriptive and gives additional authority to the City-Wide Urban Design Guidelines. In this regard, conformity with the guidelines should not be a requirement, since it is overly restrictive and does not provide flexibility, which is what guidelines are intended to do. In our opinion, a strict interpretation of the policy would require conformity with the guidelines and any variation would require an official plan amendment. In our opinion, this is overly prescriptive and does not allow for the intent of the guidelines to be maintained, which includes, in some circumstances, variations from the guidelines.

Urban Design

In our opinion, Policy 2.3.18 provides additional authority to the City-Wide Urban Design Guidelines, which can be altered at any time and not subject to Planning Act requirements for public consultation, approval or appeal. In our opinion, if there is a desire to preserve key landmarks, views and vistas in the City, they should specifically be identified in the Official Plan, where they can be vetted by the public through a formal Planning Act process.

In our opinion, Policies 2.3.34 and 2.3.36 are overly prescriptive and should not establish rigid measures for sunlight and built form placement, since not conformity to this policy will require an amendment, even in circumstances where the intent of the policy is being maintained. In our opinion, these requirements are more appropriately provided in urban design guidelines, since these criteria cannot capture every circumstance, nor do they provide the specific detail required to be perfectly measured. For example, Policy 2.3.34 is unclear as to when the 5 hours is measured (during the equinoxes and does it include the winter). Also, Policy 2.3.36 does not indicate if balconies can project into the minimum 25 metre tower separation and office towers tend to have floor plate sizes larger than 800 square metres. In our opinion, these policies should be removed from the Draft OP and included in the

City's Urban Design Guidelines, which provide additional detail regarding the intent of each guideline and criteria.

Net-Zero Greenhouse Gas Emissions

Policies 2.3.30 (Mid-rise Buildings) and 2.3.31 (Tall and Tall Plus Buildings) include policies that require these building typologies to be designed to attain near net-zero greenhouse gas emissions. In our opinion, this policy is overly restrictive and may create challenges in implementation. In this regard, we would suggest that you contact a building sciences consultant to confirm the City's current requirements in this regard and how far these proposed policies would push the net-zero requirements. In our opinion, these policies should provide additional flexibility and specify what the minimum requirements are.

Gagnon Walker Domes
PROFESSIONAL PLANNERS

Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

February 13, 2023

GWD File PN 01.242.00
MTSA

The Corporation of the City of Brampton
2 Wellington Street West
Brampton, Ontario
L6Y 4R2

Attention: **Mayor and Members of Council**
Peter Fay, City Clerk
Steve Ganesh, Commissioner, Planning, Building and Growth Management
Michelle Gervais, Policy Planner, City Planning and Design
Claudia LaRota, Supervisor/Principal Planner, City Planning and Design

Subject: **Public Input – Statutory Public Meeting**
City-Initiated Official Plan Amendment
Major Transit Station Areas
Lark Investments Inc.

Gagnon Walker Domes Ltd. (GWD) and Delta Urban Inc. (Delta Urban) acts as Planning Consultant to Lark Investments Inc. (Client); the Registered Owner of 10 and 26 Victoria Crescent, 376, 383, 387 and 391 Orenda Road and 24 Bramalea Road, in the City of Brampton (hereinafter referred to as the "subject site" – see attached ownership map). We have been asked to review and provide the City of Brampton with our comments, observations and recommendations in connection with the Information Report and Statutory Public Meeting regarding City-Initiated Official Plan Amendment – Major Transit Station Areas (MTSA).

The subject site is located in the Bramalea GO 'Primary' MTSA. Our Client has been actively participating in the Brampton Plan (City of Brampton New Official Plan) process, including correspondence dated June 3, 2022 prepared by Delta Urban. A copy of this correspondence is attached.

In addition, as Council and Committee is aware, our Client has put forward a vision to transform the subject site from existing low-order industrial uses towards a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/supportive. To advance the implementation of our Client's vision, Brampton Council passed a resolution in support of a Minister's Zoning Order (MZO) on October 20, 2021, and again on December 8, 2021. The MZO was submitted to the Ministry of Municipal Affairs and Housing (MMAH) and is currently under review by the Province.

City-Initiated Official Plan Amendment - MTSA

According to the City of Brampton Staff Report, the purpose of the City-Initiated Official Plan Amendment – Major Transit Station Areas is to propose the addition of interim Official Plan policies to better guide development and land use decisions in MTSA's, while the detailed planning and technical studies for Primary MTSA's are completed and until Brampton Plan (the 'New' Brampton Official Plan) is in effect. The OPA includes: a new schedule showing the boundaries of Primary MTSA's and the locations of Planned MTSA's; interim set of policies to support intensification and to guide development; and deletes the Mobility Hub policies, schedules and references.

The City of Brampton has scheduled the Statutory Public Meeting to receive public comments on the draft City-Initiated Interim MTSA Policies Official Plan Amendment on Monday, February 13, 2023.

On behalf of Lark Investments Inc., we have reviewed the City of Brampton Staff Report dated January 10, 2023, along with the accompanying Draft Official Plan Amendment, and offer the following comments, observations and recommendations.

1. ***Section 3.1 (6)*** of the draft OPA includes the proposed text for the new ***Section 3.2.4 – Major Transit Station Areas.*** More specifically, the third introductory paragraph under proposed Official Plan ***Section 3.2.4*** directs that "…a variety of housing option that include a mix of affordable rental and ownership housing types and unit sizes shall be provided" in terms of addressing affordable housing objectives. We recommend that the policy be revised to use progressive language such as 'encourage' and 'strive to provide', as opposed to being prescriptive. Without financial support and affordable housing development initiative/investment from all levels of government, these targets, may not be economically feasible and achievable.

2. Continuing with ***Section 3.1(6)***, and the fourth introductory paragraph under proposed Official Plan ***Section 3.2.4,*** the last sentence appears to contradict the rest of the paragraph. In this regard, the paragraph notes that the transportation network for MTSA's will be designed to support and integrate active transportation, local transit services and inter-municipal/inter-regional higher order transit services. These transit services are motorized modes of transportation. The last sentence is contradictory as it notes that non-motorized travel will be the preferred option within MTSA's. We recommend that this sentence be re-worded to reflect the objective of walkable communities, that are transit-supportive.

3. ***Section 3.1 (6)*** of the draft Official Plan Amendment, and more specifically proposed Official Plan ***Section 3.2.5.1,*** it is not clear if the objectives of this policy are meant to be met across the whole of the MTSA, or within each development application within an identified MTSA. The introductory statement notes "All development within an MTSA…" In particular, subsection f) speaks to providing a diverse, equitable and inclusive set of public service facilities and community services. It may not be feasible for each application, depending on the size of the

property, location, or existing neighbourhood characteristics (i.e. industrial/employment areas, predominantly urban built forms, etc.) to provide this. We recommend that the policy be amended to reflect that these objectives are to be achieved across the whole of the MTSA, and that the should take into consideration existing public service and community facilities (i.e. provide and contribute to).

4. General Comment – ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically proposed Official Plan ***Section 3.2.5.2*** – is the study referenced here the current MTSA Study that is ongoing by the City of Brampton, or is this a separate development application-based study to be completed by development proponents when applications are submitted?

5. ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically proposed Official Plan ***Section 3.2.5.2 b)*** speaks to building heights and FSI. The policy makes a reference to maximum heights if required. We recommend that the policy be amended to only reference the minimum heights. The subject site, along with other MTSA locations, are located in an area of the City that is subject to the recently adopted Council resolution on unlimited height and density.

6. General Comment – ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically proposed Official Plan ***Section 3.2.6*** – is the MTSA Block Concept Plan referenced in this proposed policy the same as a Tertiary Plan?

7. ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically, proposed Official Plan ***Section 3.2.6.4***, we applaud the policy "encouraging" owners within an area to work together to produce the Block Concept Plan. However, the policy then goes on to note an individual owner may complete the Plan for the entire area if others decide not to participate. The policy does not reflect situations where other owners may not necessarily "decide not to participate", but rather the owner proceeding to prepare the plan may not be aware of other owners who are in the process of preparing an application. The Policy also does not reflect whether this plan is one that gets revised from time-to-time as successive applications are brought forward. We recommend that this policy be deleted in its entirety.

8. General Comment – ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically proposed Official Plan ***Section 3.2.6.5 g)*** – is the phasing of development referred to in this policy within each site-specific development, or across the whole of the MTSA? There are instances, depending on the size and extent of the development proposed where phasing could occur in both instances. We recommend that phasing should be eliminated in general, whether within the block or the MTSA. If all lands can proceed, phasing should not be forced.

9. ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically, proposed Official Plan ***Section 3.2.7.1***, speaks to the preparation of a Growth Management Strategy. It would appear, but is not clear in the policy, that this is similar to the Growth Management Staging and Sequencing Reports prepared in

the Block Plan process. Confirmation and clarification is required, and should be worked into the proposed policy. It is not clear in the proposed policy who prepares this report (the first application in the MTSA, each application (i.e. updating the original report)), or the mechanism to ensure coordination where applicants may not be aware that others are planning/proceeding to file site-specific applications.

10. ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically, proposed Official Plan ***Section 3.2.7.3***, should include less prescriptive language such as "encourage" or "explore". In some cases, there may be constraints to consolidation of parcels (owners not prepared to sell, varying lengths of commercial leases, etc.) that would preclude this from occurring. Official Plan policy should not mandate the requirement of a property owner to purchase other properties, and conversely, to sell properties. There are policies in place to require applicants to demonstrate conformity with various policy objectives, along with demonstrating that proposed developments do not preclude the overall objectives of the MTSA. These are sufficient, and we recommend that this policy be deleted in its entirety.

11. ***Section 3.1(6)*** of the draft Official Plan Amendment, and more specifically, proposed Official Plan ***Section 3.2.8***, is a policy section specifically related to Planned MTSA's, and speaks to the nature of these areas requiring further study to determine appropriate land use considerations before they are delineated. Proposed Official Plan ***Sections 3.2.4 through 3.2.7*** provide interim policies for MTSA locations, that appear to refer to the Primary or Secondary MTSA's; those that are delineated, however, those policies are not under a specific section heading that identifies those policies as being specific to the delineated MTSA's. In addition, they include generic references to "development in a MTSA", which would include Planned MTSA's; this would appear to conflict with the Planned MTSA section (Section 3.2.8). We recommend that the previously noted proposed sections be placed under an appropriate heading to reflect the MTSA's that the policies apply to.

12. The draft Official Plan Amendment to introduce Interim MTSA Policies is premature, given that the MTSA study is ongoing, and a number of the Focus Group Sessions for the Primary MTSA's are either occurring after the Public Meeting (Mount Pleasant MTSA on February 16, 2023), or have yet to be scheduled (Bramalea GO, Brampton GO, Centre, Kennedy and Rutherford). These reflect a large number of Primary MTSA locations where the greatest heights and densities are expected to be accommodated, including the MTSA within which the subject site is located (Bramalea GO MTSA). Specifically for the Bramalea GO MTSA, the policies should reflect the pending MZO and vision which was endorsed by Council, and special provisions for this MTSA should be provided. We recommend any decision on this draft City-Initiated OPA be deferred until after input is received from all of the Focus Group Meetings for all of the MTSA locations.

Closing Remarks

Thank you for the opportunity to provide comments on the Draft City-Initiated Official Plan Amendment – Major Transit Station Areas. Our Client reserves the right to provide further comments as necessary prior to Council approval of the Official Plan Amendment.

Kindly accept this letter as our formal request to be notified of all future Open Houses, Public Meetings, Planning Committee and Council meetings to be held in connection with the City-Initiated Official Plan Amendment – Major Transit Station Areas. Lasty, we request notification of the passage of any and all By-laws and/or Notices on this matter. Should you have any questions, please contact the undersigned.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner and Principal Planner

Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Partner and Managing Principal Planner

cc: **Lark Investments Inc.**
Mustafa Ghassan, Delta Urban Inc.
Liam England, Delta Urban Inc.
Anthony Sirianni, Gagnon Walker Domes Ltd.
Harjap Singh, Gagnon Walker Domes Ltd.

Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

April 24, 2023

GWD File PN 01.242.00
MTSA

The Corporation of the City of Brampton
2 Wellington Street West
Brampton, Ontario
L6Y 4R2

Attention: **Mayor and Members of Council**
Peter Fay, City Clerk
Steve Ganesh, Commissioner, Planning, Building and Growth Management
Michelle Gervais, Policy Planner, City Planning and Design
Claudia LaRota, Supervisor/Principal Planner, City Planning and Design

Subject: **Public Input – April 24, 2023 Planning & Development Committee**
Item 7.2 - City-Initiated Official Plan Amendment
Major Transit Station Areas (City-Wide)
Lark Investments Inc.

Gagnon Walker Domes Ltd. (GWD) and Delta Urban Inc. (Delta Urban) acts as Planning Consultant to Lark Investments Inc. (Client); the Registered Owner of 10 and 26 Victoria Crescent, 376, 383, 387 and 391 Orenda Road and 24 Bramalea Road, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located in the Bramalea GO 'Primary' MTSA.

We have been monitoring and actively engaged in the City's MTSA Planning Study process, and we previously provided comments on the draft City-Initiated Official Plan Amendment – Major Transit Station Areas (MTSA) on February 13, 2023.

Our Client has also been actively participating in the Brampton Plan (City of Brampton New Official Plan) process, including correspondence dated June 3, 2022 prepared by Delta Urban.

City-Initiated Official Plan Amendment - MTSA

On behalf of Lark Investments Inc., we have reviewed the City of Brampton Staff Recommendation Report dated March 8, 2023, along with the accompanying revised Draft Official Plan Amendment (OPA). We note that revisions to the Draft Official Plan Amendment have incorporated most of our previous comments. Following our detailed review of the revised Draft Official Plan Amendment, we offer the following additional comments, observations and recommendations.

1. ***Policy 3.2.4.1*** of the draft revised OPA includes directs that "*…a minimum number of residents and jobs will be applied.*" The next sentence then references "*The minimum number of residents and jobs combined per hectare…outlined in Table 1…*' In the first sentence, this would represent a total number of residents and jobs, while the second sentence and Table 1 are density targets that are calculated across the whole of the MTSA. We recommend that the first sentence be amended to read: '*… a minimum density target of residents and jobs per hectare will be applied.*'

2. ***Policy 3.2.5.1*** – While the revisions to policy to indicate lands within "Primary" MTSA's and the reference to being developed in accordance with the applicable Secondary Plan designation to generally meet the listed objectives partially addresses our earlier comments, it is still not clear if the objectives of this policy are meant to be met across the whole of the MTSA, or within each development application within a "Primary" MTSA. We recommend that language be added to the policy lead-in paragraph that the objectives are to be achieved across the whole of the MTSA.

3. ***Policy 3.2.5.1 b)*** – The objective for transitioning to lower density established neighbourhoods is supportable, however, the reference to '*properties that do not have frontage along existing or planned higher order transit corridors*' should be removed. There are areas in the "Primary" MTSA's, including the subject site, where there are properties that do not have frontage along existing or planned higher transit corridors that do not necessarily require transition to lower heights. The policy should simply remove this part, and simply direct transitioning from the location of the highest built form to the existing lower density areas to achieve the appropriate transitions.

4. ***Policy 3.2.5.2 b) and c), and Policies 3.2.5.4 and 3.2.5.5*** – While the revised Draft OPA replaced "if required" to "and if appropriate" with regard to maximum building heights and maximum FSI, we continue to recommend that the policy be amended to only reference the minimum heights. The letter dated February 9, 2023 to the Region of Peel which clarifies that through the modifications and approval of the Region of Peel Official Plan in November 2022, the local municipalities are not permitted to assign maximum building heights in MTSA's.

5. ***Policy 3.2.5.3*** – Is a new policy that has been added to this version of the draft OPA. The policy is vague and not clear when Inclusionary Zoning may apply, as it states that it may apply to 'specific "Primary" MTSA's', but does not specify which ones. Further, it does not include criteria to decide when, if and where it would apply. Inclusionary Zoning is one (1) of many tools available to be utilized to address housing concerns, which is already being addressed through the housing compatibility component of the Planning Justification Report. We recommend that this policy be deleted in its entirety.

6. ***Policies 3.2.6, 3.2.6.1 and 3.2.6.2*** – In the opening paragraph of Policy 3.2.6, it notes that Tertiary Plans be prepared if the site is adjacent to a new higher order

transit station that is proposed or that the site is adjacent to an existing higher order transit station, but then appears to expand this requirement to all areas of a "Primary" MTSA in Policy 3.2.6.1. These statements appear to contradict themselves. Further, given the language of Policy 3.2.6.1, is Policy 3.2.6.2 necessary; we recommend deletion of Policy 3.2.6.2 given the wording of Policy 3.2.6.1.

7. ***Policy 3.2.6.3*** – While the revised Draft OPA partially addresses our previous comments, we remain concerned as this policy still assumes that all applications are proceeding at the same time. The requirement for the submission of one joint Tertiary Plan does not recognize that different landowners may be at different stages of the development application process for their sites. We are concerned with this policy language as it has the potential to hold up applications that otherwise might be able to proceed. We recommend that the last sentence be deleted in its entirety. This is further supported by the inclusion of Policy 3.2.6.4 which speaks to the process whereby an already approved Tertiary Plan may be modified in the instance where different landowners are on different development timelines.

8. ***Policies 3.2.7.1 and 3.2.7.2*** – These policies speak to the responsibility of the applicant to prepare a Growth Management Strategy to assess the timing and delivery of servicing infrastructure. The policy does not reflect that in most cases this requires assessing or recommending/implementing servicing upgrades across lands that are not in the applicants control, or timing of improvements that are not in the applicants control (i.e. City and Regional Capital Works Program changes, etc.).

   Further, the policy requires that the Growth Management Study be included as a section in the Planning Justification Report, meet the established terms of reference, and be to the satisfaction of the City and Region, prior to deeming the application complete. It is inappropriate to require the strategy to be to the satisfaction of the municipalities prior to deeming the application complete. The policy should only require that the strategy be deemed to have met the requirements of the terms of reference prior to deeming it complete, and thereafter, through the processing of the application and the technical review will the strategy ultimately be approved to the satisfaction of the municipalities.

Closing Remarks

Thank you for the opportunity to provide comments on the Draft City-Initiated Official Plan Amendment – Major Transit Station Areas. Our Client reserves the right to provide further comments as necessary prior to Council approval of the Official Plan Amendment.

Kindly accept this letter as our formal request to be notified of all future Open Houses, Public Meetings, Planning Committee and Council meetings to be held in connection with the City-Initiated Official Plan Amendment – Major Transit Station Areas. Lasty, we request notification of the passage of any and all By-laws and/or Notices on this matter.

Should you have any questions, please contact the undersigned.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner, Principal Planner

Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Partner, Managing Principal Planner

cc: Lark Investments Inc.
Mustafa Ghassan, Delta Urban Inc.
Anthony Sirianni, Gagnon Walker Domes Ltd.
Harjap Singh, Gagnon Walker Domes Ltd.

Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

August 28, 2023

GWD File: PN.92.242.00

The Corporation of the City of Brampton
2 Wellington Street West
Brampton, Ontario
L6Y 4R2

Attention: **Steve Ganesh, Commissioner, Planning, Building and Growth Management**
Michelle Gervais, Policy Planner
Claudia LaRota, Supervisor/Principal Planner

Subject: **Public Input – Letter of Concern**
Brampton Major Transit Station Areas
Draft Bramalea GO Station MTSA Land Use Plan
10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road, and 24 Bramalea Road – Lark Investments Inc.

Gagnon Walker Domes Ltd. ("GWD") and Delta Urban Inc. ("Delta Urban") acts as Planning Consultant to Lark Investments Inc. ("Lark"); the registered owner of the properties municipally known as 10 and 26 Victoria Crescent, 376, 383, 387, 390 and 391 Orenda Road and 24 Bramalea Road, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located within the Bramalea GO Station 'Primary' Major Transit Station Area ("MTSA").

Lark has put forward a vision to transform the subject site from existing low-order industrial uses towards a dynamic mixed-use complete community, with an emphasis on higher density and a broader range of residential and employment uses which are transit-oriented/supportive and pedestrian friendly. In this regard, Council passed a resolution in support of a Minister's Zoning Order (MZO) on October 20, 2021, and again on December 8, 2021. The MZO was submitted to the Ministry of Municipal Affairs and Housing (MMAH) to support the proposed intensification and higher-order development of the subject site within the Bramalea GO 'Primary' MTSA. The MZO is currently at the Province for review.

In addition, Lark has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, Lark's participation in the Bramalea GO MTSA Focus Group Session that was hosted by City Staff on April 13, 2023, and through formal written correspondence prepared by GWD on behalf of Lark to the City's Planning and Development Committee dated February 13, 2023, April 24, 2023 and July 18, 2023.

Lark is also an Appellant of City of Brampton Official Plan Amendment OP2006-247.

City of Brampton Information Report

We understand that the City of Brampton Planning Department is tabling an Information Report to the August 28, 2023 Planning and Development Committee Meeting, including the holding of a Statutory Public Meeting in connection with the proposed MTSA policies and schedules as part of the future Official Plan Amendment recommending adoption of Brampton Plan. Public input on the proposed policies is being sought at the Statutory Public Meeting.

Lark continues to have significant concerns with the proposed Bramalea GO MTSA Land Use Plan as it is not consistent with the Council endorsed MZO Resolution.

Bramalea GO Station MTSA Draft Land Use Plan and Proposed Policies

GWD has reviewed the August 28, 2023 Information Report, including the proposed MTSA Policies and the revised Draft Bramalea GO Station MTSA Land Use Plan. Based on our review, we offer the following comments, observations and recommendations.

1. ***Proposed Land Use Designation*** – The subject site is proposed to be designated 'Mid-Rise Residential', 'Mid-Rise Mixed-Use', 'High-Rise Mixed-Use', 'Office Mixed-Use' and 'Office' pursuant to the Draft Bramalea GO Station MTSA Land Use Plan. Lark has serious concern with these proposed land use designations as they are not consistent with the Council endorsed MZO Resolution.

   It is Lark's position, based on the limited information provided at this time, that the subject site should be designated a combination of 'High-Rise Mixed-Use' and 'Mid-Rise Mixed-Use', consistent with the Council endorsed MZO Resolution.

   City Staff in the response to comments Matrix in Appendix 5 of the August 28, 2023 Information Report suggest that there is "no reference int the Council Resolution about a Council "endorsed" Concept Plan, and that the "Council Resolution does not endorse any land use designations for lands subject to the MZO". This is simply not true. Council Resolution notes, among other clauses:

   - "Whereas City Council has received a request to support a Minister's Zoning Order, referred to as an MZO, through a letter dated October 5, 2023 from Mustafa Ghassan of Delta Urban Inc., to facilitate the development of lands known municipally as 10 and 26 Victoria Crescent; 376, 387 and 391 Orenda Road, and 24 Bramalea Road, as well as the lands located within the area generally bounded, as noted below, and as identified on the attached Schedule A – Location and Land Use Map"; and,

   - "Now Therefore be it Resolved That Council supports the request for an MZO and asks that the Minister of Municipal Affairs and Housing consider this request".

The Schedule referred to in the Council Resolution, clearly notes the lands as a combination of 'Medium High Density' and 'Mixed-Use High Density'.

The following additional comments are provided on the designations located on the subject site pursuant to the Draft Bramalea GO Station MTSA Land Use Plan:

a. High-Rise Mixed Use/Mid-Rise Mixed Use Designations

As noted above we believe the subject site should be designated with the land use designation that permits high density/high-rise, and mid-rise built forms and a broad range of residential and non-residential land uses. However, in the absence of policies associated with the proposed land uses the identification of the appropriate land use designation and development polices associated thereto is not possible.

Prior to any consideration of potential land use designations with the Bramalea GO Station MTSA associated draft planning policies must be provided for review and comment.

b. Office Mixed-Use Designation

While the Office Mixed-Use Designation includes the ability to include mid-rise and high-rise residential, it does so with the condition that a specified number of jobs be provided given a ratio of MOE jobs to population for the various MTSA's. For the Bramalea GO, it is 2.2:1.

The area set aside for office / office mixed-use in the Bramalea GO MTSA is quite large, and is isolated from any other office areas/nodes. The proposed Draft Land Use Plan may have the unintended consequence of setting aside lands that the market will not support and will have the opposite effect – they will remain vacant. The materials do not seem to provide background on how the GFA numbers were arrived at, nor how the ratios were developed.

In addition, subsection c) of the proposed policies permits hotels, motels and conference/convention centres, along with offices as being uses that are primarily intended to for the Office Mixed-Use designation. These uses are neither office generators, nor will they generate the same number of jobs as an office.

c. *Proposed Public or Private Street Network* – The Draft Bramalea GO Station MTSA Land Use Plan identifies a 'Proposed Public or Private Street Network' on the subject site. The westerly extension of East Drive to Victoria Crescent is consistent with the Lark Vision/Council endorsed MZO Resolution, however the north-south connection from Victoria Crescent in the north to the Bramalea GO Station (crossing both Orenda Road and Steeles Avenue East) is not consistent with the Lark Vision/Council

endorsed MZO Resolution, and should be amended to reflect that alignment.

d. *Proposed Neighbourhood Park* – Given the subject site's proximity to the Victoria Park complex and open space lands, as well as the nearby open space/trail system, along with the opportunity for amenity space within the proposed redevelopments, we continue to request that the 'Neighbourhood Park' be deleted.

2. ***Proposed MTSA Policies*** – It is unclear how the Interim Policies of OPA2006-247 are being integrated with these proposed policies. There are various criteria from the Interim policies on guiding development applications that are not part of these proposed policies. It would appear that the proposed MTSA policies for inclusion in the future Brampton Plan as outlined in Appendix 1 to the August 28, 2023 Information Report is incomplete. The full set of proposed policies should be brought forward, as opposed to a piecemeal fashion.

Closing Remarks

In consideration of the above noted concerns, Lark does not support the Draft Bramalea GO Station MTSA Land Use Plan or proposed policies for the Planning and Development Committee/City Council's consideration at this time.

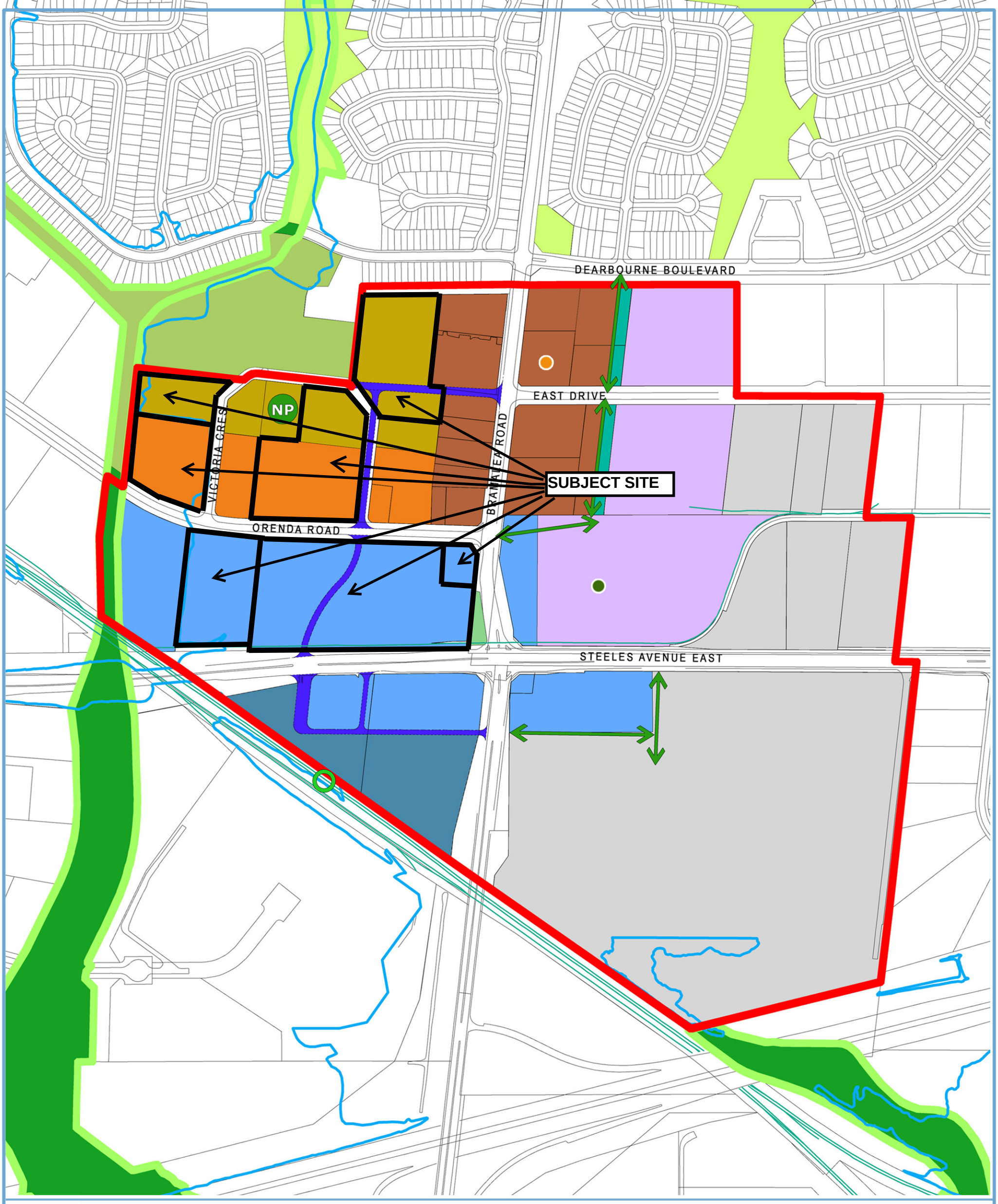
Lark would welcome opportunity to meet with City Staff to further discuss its concerns. We reserve the right to provide further comments.

Should you have any questions, please contact the undersigned.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner and Principal Planner

cc: Lark Investments Inc.
M. Ghassan, Delta Urban Inc.
S. D'Agostino, Thomson Rogers
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.
M. Gagnon, Gagnon Walker Domes Ltd.



LEGEND

- NEIGHBOURHOOD (MID-RISE RESIDENTIAL)
- MIXED-USE (MID-RISE MIXED-USE)
- MIXED-USE (HIGH-RISE MIXED-USE)
- OFFICE MIXED-USE
- EMPLOYMENT (PRESTIGE INDUSTRIAL)
- EMPLOYMENT (INDUSTRIAL)
- TRANSIT STATION
- NATURAL HERITAGE SYSTEM (NHS)
- NHS BOUNDARY IN PARK
- PARKS AND OPEN SPACE (COMMUNITY PARK)
- PARKS AND OPEN SPACE (NEIGHBOURHOOD PARK)
- TRCA FLOODLINE
- NP PROPOSED NEIGHBOURHOOD PARK
- MTSA BOUNDARY
- MTSA STATION
- PROPOSED PUBLIC OR PRIVATE STREET NETWORK
- MID-BLOCK CONNECTION
- PROPOSED LANDSCAPE BUFFER
- DESIGNATED HERITAGE PROPERTY
- LISTED HERITAGE PROPERTY
- RAIL LINE

N W E S

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Metres

POLICY PLANNING | PLANNING, BUILDING AND ECONOMIC DEVELOPMENT | CITY OF BRAMPTON

BRAMPTON MAJOR TRANSIT STATION AREAS

BRAMALEA GO STATION DRAFT LAND USE PLAN

DRAFT FOR REVIEW ONLY

AUGUST 2023