



APPENDIX #3



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

October 23, 2023

GWD File: PN.22.3124.00

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 Zbogor, Director, City Planning & Design
 Shannon Brooks-Gupta, Principal Planner, City Planning & Design

Subject: **Public Input – Letter of Concern**
 Final Draft – Proposed ‘Brampton Plan’
 249 Queen Street East – Manga (Queen) Inc.

Gagnon Walker Domes Ltd. (“GWD”) acts as Planning Consultant to Manga (Queen) Inc. (“Manga”); the Registered Owner of the property known municipally as 249 Queen Street East in the City of Brampton (hereinafter referred to as the “subject site”). The subject site is located at the southeast corner of Queen Street East and Hansen Road, and is located within the Rutherford ‘Primary’ Major Transit Station Area (“MTSA”).

Manga has submitted an Application to Amend the City of Brampton Zoning By-law in April 2023 – City File No. PRE-2022-0023 (“Amendment Application”). The Amendment Application is currently undergoing the required Completeness Review stage of the Application process, and is expected to be deemed complete by the City of Brampton shortly. The Statutory Public Meeting will be scheduled thereafter. The Manga Amendment Application proposes the redevelopment of the subject site for a 38-storey, 394-unit mixed use residential/retail building.

The Amendment Application, as submitted, have been advanced in the context of the current, in-force City of Brampton Official Plan/Secondary Plan policies pertaining to the subject site and MTSAs.

Manga has been actively engaged in the City of Brampton’s Official Plan and associated MTSA Planning Study process. This has included, but is not limited to, Manga’s participation in the Rutherford MTSA Focus Group Session that was hosted by City Staff on March 23, 2023, and through formal written correspondence prepared by GWD on behalf of Manga to the City’s Planning and Development Committee dated June 3, 2022, April 24, 2023, July 18, 2023 and August 28, 2023 (a copy of prior written correspondence to the City of Brampton is attached to this letter in **Appendix 1**).

We write to express Manga’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.

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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' (Queen Street East);
 - 'Community Areas'.
- Schedule 2 - Designations:
 - 'Mixed Use'.
- Schedule 13f – Brampton Major Transit Station Areas QUE-3 – Rutherford Land Use Plan:
 - 'Mixed Use (High-Rise Mixed-Use)';
 - 'Potential Mid-Block Connection'.

ADDITIONAL CONCERNS REGARDING FINAL DRAFT BRAMPTON PLAN

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

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: Manga (Queen) Inc.
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.



APPENDIX #1



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

June 3, 2022

GWD File PN 22.3124.00
'New' BOP 2022

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
Jason Schmidt-Shoukri, Commissioner, Planning, Building and
Economic Development

Subject: Public Input
Manga (Queen) Inc.
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Manga (Queen) Inc. the Registered Owner of 249 Queen Street East, in the City of Brampton (hereinafter referred to as the "subject site"). We have been asked to review and provide the City of Brampton with our comments, observations and recommendations on the 'new' Draft Brampton Plan (Official Plan).

A formal Development Pre-Application Consultation Meeting (PRE-2022-0023) was held on March 11, 2022 regarding the proposal to develop the subject site for mixed-use Residential and Commercial purposes.

Draft Brampton Plan (Official Plan)

The purpose of the City of Brampton Official Plan conformity review exercise is to achieve Official Plan conformity with the 'new' Region of Peel Official Plan (ROP). The ROP was adopted by Regional Council on April 28, 2022 (it is pending final approval by the Ministry of Municipal Affairs and Housing).

On April 26, 2022, the City of Brampton released the draft 'new' Official Plan for public review and comment. It is understood that the 'new' Official Plan is targeted for final consideration and adoption by City Council on July 6, 2022.

The City of Brampton has requested that public comments on the draft 'new' Official Plan be provided by June 3, 2022. The aforementioned date is not a legislative deadline. Comments can be filed on the draft 'new' Official Plan up until the moment that Council approves the document.

On behalf of Manga (Queen) Inc., we offer the following comments, observations and recommendations dealing with the draft 'new' Official Plan:

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1. **Sections 2.1.3 and 2.1.4** directs that the tallest buildings will be directed to Urban Centres, and that within Boulevards and Major Transit Station Areas. The policy also states that taller buildings may be permitted subject to the implementation of other policies of the Official Plan. The subject site is located along a Primary Urban Boulevard and within a Planned Major Transit Station Area. **Table 4** identifies that within Primary Urban Boulevard Areas that the building typology should be Low-Rise Plus and Mid-Rise. It is recommended that the policy include flexibility to allow for greater building heights where appropriate. The policy as currently drafted will not likely achieve the Municipality's intended housing and residential objectives.
2. **Section 2.1.16** speaks to providing for 'minimum' growth forecasts on **Table 1**, as noted in the ROP. It is noted that the ROP does not use the word 'minimum', but rather 'target'. We recommend that the word 'minimum' be replaced with 'target' so that the reference to forecasts is consistent with the ROP.
3. **Section 2.1.33.c)** identifies that: *"Where a City-initiated study of a Major Transit Station Area has not been initiated or approved by way of an amendment to Brampton Plan, the City may require the coordination of development applications between applicants, by way of a Secondary Plan and/or Precinct Plan at the cost of the applicant. The Secondary Plan and/or Precinct Plan will be subject to the applicable policies of the overlapping Centre or Boulevard, or other similar approaches to ensure an orderly, coordinated, and phased approach to the provision of Civic Infrastructure prior to or coincident with development."*

Secondary Plans, Block Plans and/or MTSA Plans, where required by the City of Brampton, should not necessarily be a cost which is to be shouldered by individual or groups of development proponents. The size and scope of the aforementioned planning exercises, within the Urban Built-up Area can involve a great many individual landowners and as such the cost should be borne by the City of Brampton.

It may be appropriate, subject to further consideration, to require individual proponents to absorb the costs when pre-existing plans are being amended on a site-specific basis. The majority of the lands located within the City's Primary and Planned MTSA's, Centres and the Urban Growth Centre do not currently have Precinct Plans in place and as such it could be an onerous financial responsibility to require individual stakeholders to fund their preparation; assuming that they are actually required (something which is debateable).

We recommend that **Section 2.1.33.c)** be modified to delete the reference to the cost of 'new' Secondary Plans, Block Plans, Precinct Plans and/or MTSA Plans, as being something, which needs to be borne by individual and/or a group of development proponents.

4. General Comment – On Page 2-20, under the heading 'Secondary Plans', we note that the introductory paragraph is identical to the paragraph in the 'blue box' printed immediately to the right thereof. Is there any significance to the 'blue box' versus the regular text?
5. The wording of the policy in **Section 2.1.49** does not clearly indicate how the limits of a Precinct Plan are to be determined in specific instances; including, where the Secondary Plan does not include/identify the location of Precincts). The policy directs that Precinct Plans will be required with the submission of, among others, a 'significant' Zoning By-Law Amendment, but does not specify what the threshold is for determining if a Zoning By-Law Amendment is 'significant'. It is recommended that the policy be revised to include criteria



as to what the threshold of 'significant' is; the objective is to ensure that the policy is objective as opposed to subjective.

6. The policy at the bottom of Page 2-33 as well as **Section 2.2.64** are not complete policies. It seems that both are missing the list of designations/overlays and criteria for development in 'new' Neighborhoods. Both policies need to be corrected and reissued to the public for review and comment before they can be advanced to Council for approval.
7. **Section 2.2.2 a)** speaks to higher density development within Mixed-Use Districts that are identified as Primary Major Transit Station Areas. **Table 5** limits building types in the aforementioned areas to Mid-Rise only; with the opportunity to pursue a Tall or Tall Plus building only through a site-specific assessment. We recommend that the policy be revised to facilitate greater flexibility, without the need to undertake a site-specific assessment; especially in situations where as in the case of the subject site, the property in question is located on a BRT Line.
8. **Sections 2.2.26 e)** and **2.2.36** restrict all surface parking in Boulevards (including within Primary Urban Boulevards). This is a restrictive policy and we believe that it may be difficult to implement, since there are instances where surface parking is/may be required (i.e., serving retail/commercial developments with parking, lay-by parking and delivery/service parking). We recommend that this section be revised to state that parking will 'mainly' be located underground.
9. **Housing and Social Matters Chapter** (Pages 2-195), **Sections 2.3.226** and **2.3.244** reference the implementation of annual minimum 'new' housing unit targets. In particular, it notes that 25% of all 'new' housing units are to be rental in tenure. It is not clear whether the implications of this from a market demand and cost perspective was considered. In addition, it can be interpreted that from an implementation perspective, 25% of every Secondary Plan Area, Precinct Plan Area or individual Draft Plan is required to provide rental units. In regards to rental units, we note for the record that many condominium units are purchased as investments which are rented out; thereby adding to the inventory of available rental units. The very prescriptive policies as currently drafted may result in unintended consequences or reactions within the housing market. We recommend that the policy be revised to use more progressive language, such as 'encourage' and 'strive to provide'.
10. Similarly, **Housing and Social Matters Chapter** (Pages 2-195), **Sections 2.3.226** and **2.3.244** contain minimum housing targets in terms of affordability and density. With regard to density, it is not clear if the requirement that 50% of all affordable housing is to be provided for/available for low-income residents. Toward this end, are these units considered to be a component of the requirement that 30% of all new housing units are to be affordable housing. If the targets are too high, it can create a false expectation associated with addressing the problem of insufficient affordable housing. This may create other unintended problems.

With regard to density, the policies indicate that 50% of all 'new' housing units are to be in forms other than single-detached and semi-detached. These targets seem high. The targets do not appear to take into account market demand which play a significant role in dictating unit types and densities. The prescriptive nature of the policy, combined with the targets, make this policy far too ambitious. Care and caution should be exercised so as to avoid unintended consequences within the housing market. We recommend that these targets be reconsidered to better reflect the reality of the market place and realities



associated with implementation. Without financial support and affordable housing development initiatives, and investment by all levels of government, these targets, (if maintained) are not achievable.


Closing Remarks

Thank you for the opportunity to provide comments on the Draft Brampton Plan (Official Plan). Our Client reserves the right to provide further comments as necessary prior to Council approval of the 'new' Official Plan.


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 Draft Brampton Plan (Official Plan). Lastly, we request notification of the passage of any and all By-laws and/or Notices in connection with the Draft Brampton Plan (Official Plan).

Should you have any questions, please contact the undersigned.

Yours truly,



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



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

cc: Adrian Smith, Region of Peel
Andrew McNeill, City of Brampton
Manga (Queen) Inc.
Marc De Nardis, Gagnon Walker Domes Ltd.
Richard Domes, Gagnon Walker Domes Ltd.



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

April 24, 2023

GWD File PN 22.3124.00
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)
Manga Hotels

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Manga Hotels (Client); the Registered Owner of 249 Queen Street East, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located in the Rutherford 'Primary' MTSA.

Our client is currently preparing redevelopment plans for the subject site, and the formal submission was recently made to BramPlanOnline. In addition, we have been monitoring and actively engaged in the City's MTSA Planning Study process.

City-Initiated Official Plan Amendment - MTSA

On behalf of Manga Hotels, we have reviewed the City of Brampton Staff Recommendation Report dated March 8, 2023, along with the accompanying revised Draft Official Plan Amendment (OPA), and offer the following 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

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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 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, in addition to 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. Lastly, 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: **Manga Hotels**
Anthony Sirianni, Gagnon Walker Domes Ltd.
Harjap Singh, Gagnon Walker Domes Ltd.



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July 18, 2023

GWD File: PN.22.3124.00

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2 Wellington Street West
Brampton, Ontario
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Attention: 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 – Letter of Concern
Brampton Major Transit Station Areas
Draft Rutherford Road Station MTSA Land Use Plan
Manga (Queen) Inc.

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Manga (Queen) Inc. ("Manga"); the Registered Owner of the property municipally known as 249 Queen Street East in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located at the southeast corner of Queen Street East and Hansen Road, and is located within the Rutherford 'Primary' Major Transit Station Area ("MTSA").

Manga has submitted an Application to Amend the City of Brampton Zoning By-law in April 2023 – City File No. PRE-2022-0023 ("Amendment Application"). The Amendment Application is currently undergoing the required Completeness Review stage of the Application process, and is expected to be deemed complete by the City of Brampton shortly. The Statutory Public Meeting will be scheduled thereafter. The Manga Amendment Application proposes the redevelopment of the subject site for a 38-storey, 394-unit mixed use residential/retail building.

The Amendment Application, as submitted, have been advanced in the context of the current, in-force City of Brampton Official Plan/Secondary Plan policies pertaining to the subject site and MTSA's.

Manga has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, Manga's participation in the Rutherford MTSA Focus Group Session that was hosted by City Planning Staff on March 23, 2023, and through formal written correspondence prepared by GWD on behalf of Manga to the City's Planning and Development Committee dated April 24, 2023.

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Proposed City of Brampton Recommendation Report

We understand that the City of Brampton Planning Department is anticipating the tabling of a Recommendation Report to the July 31, 2023 Planning and Development Committee Meeting to seek Council endorsement of numerous Draft MTSA Land Use Plans, including the Draft Rutherford Road Station MTSA Land Use Plan, prior to the preparation of detailed policy associated with these draft Land Use Plans.

Manga has significant concerns with the advancement of an MTSA Land Use Plan for Council endorsement or adoption, as it is premature in the absence of any associated policy/development framework related thereto.

Rutherford Road Station Draft Land Use Plan

Notwithstanding the concerns noted above, GWD has reviewed the Draft Rutherford Road Station MTSA Land Use Plan that was recently made available on the City of Brampton website (enclosed). Based on our review of this Draft MTSA Land Use Plan, we offer the following comments, observations and recommendations.

- 1. Proposed Land Use Designation and Absence of Associated Land Use and Development Policies*** – The subject site is proposed to be designated ‘High-Rise Mixed-Use’ pursuant to the Draft Rutherford Road Station MTSA Land Use Plan. Generally, we are supportive of this designation as it would appear to be consistent with the Manga Amendment Application.

However, Manga has significant concerns that no detailed land use planning policy has been advanced in concert with the Draft Rutherford Road Station MTSA Land Use Plan. In the absence of any land use and development planning policy direction, it is not possible for Manga to appropriately review, assess and provide meaningful input on the Draft Rutherford Road Station MTSA Land Use Plan in the context of the Manga Amendment Application, or opine on the MTSA Land Use Plan’s consistency with/conformity to Provincial, Regional and City policies/plans.

In the absence of any detailed draft land use and development policy associated with the various land use designations and overlays identified on the Draft Rutherford Road Station MTSA Land Use Plan, it is our opinion that any consideration of the Draft Rutherford Road Station MTSA Land Use Plan by Planning and Development Committee or City Council is premature.

Closing Remarks

In consideration of the above noted concerns, Manga does not support the Planning Department’s intent to table the Draft Rutherford Road Station MTSA Land Use Plan for Planning and Development Committee/City Council’s consideration at this time.

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

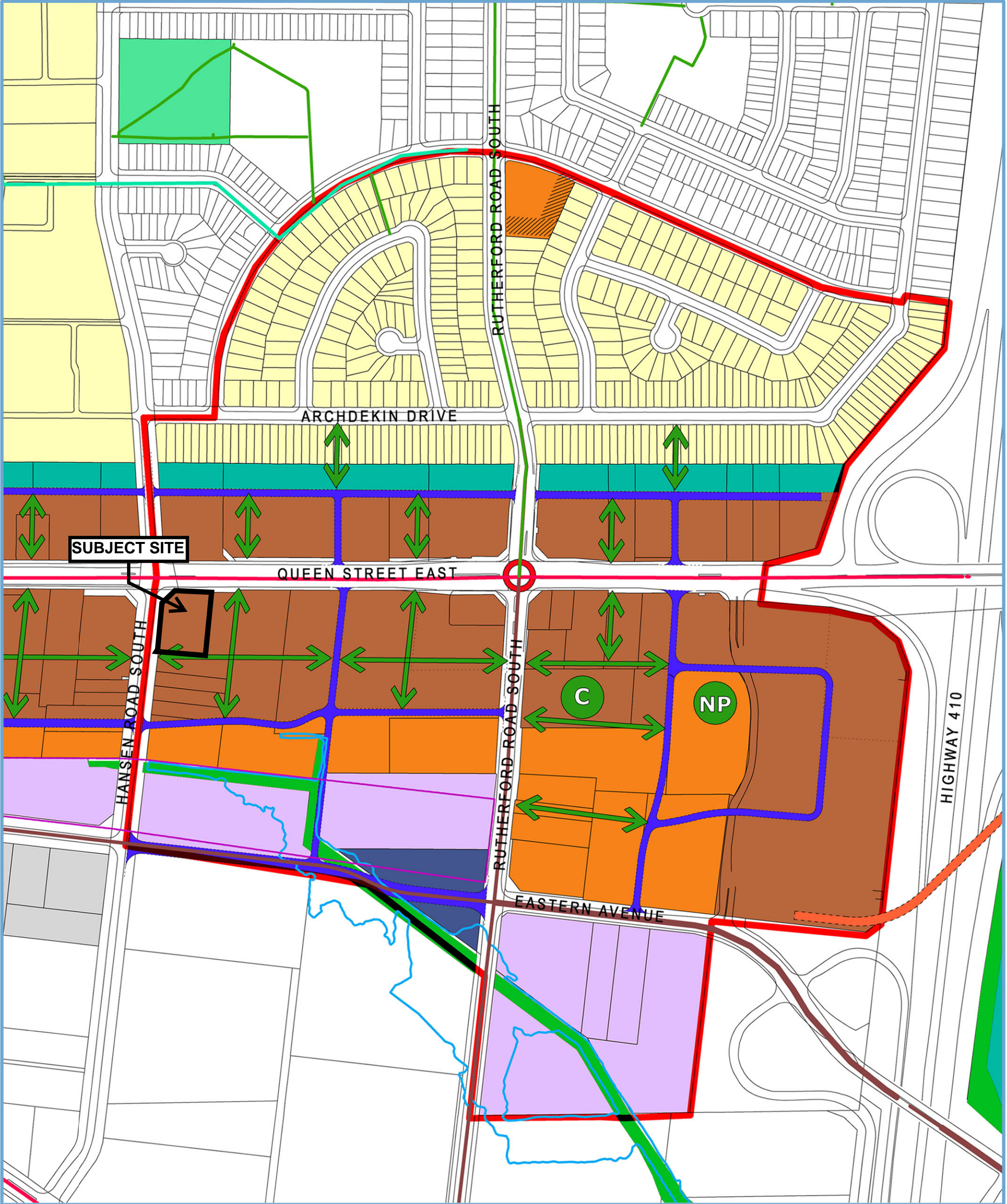


Should you have any questions, please contact the undersigned.

Yours truly,

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

cc: **Manga (Queen) Inc.**
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.
M. Gagnon, Gagnon Walker Domes Ltd.



LEGEND

- LOW-RISE RESIDENTIAL

MID-RISE MIXED-USE

HIGH RISE MIXED-USE

INSTITUTIONAL

PRESTIGE INDUSTRIAL

FIRE STATION

NP PROPOSED PARK

C POTENTIAL COMMUNITY HUB

PROPOSED PUBLIC OR PRIVATE STREET NETWORK

MID-BLOCK CONNECTION

PROPOSED PEDESTRIAN BRIDGE

PROPOSED LANDSCAPE BUFFER

NATURAL HERITAGE SYSTEM

EXISTING OPEN SPACE

MTSA BOUNDARY

MTSA STATION

EXISTING ACTIVE TRANSPORTATION NETWORK LINK

PROPOSED MULTI-USE PATH / BOULEVARD PATH

PROPOSED PROTECTED BIKE LANE OR CYCLE TRACK

PROPOSED SHARED ROADWAY

TRCA FLOODLINE

SPECIAL POLICY AREA

HEIGHT TRANSITION AREA
-
- POLICY PLANNING | PLANNING, BUILDING AND ECONOMIC DEVELOPMENT | CITY OF BRAMPTON
- BRAMPTON MAJOR TRANSIT STATION AREAS

RUTHERFROD ROAD STATION DRAFT LAND USE PLAN

DRAFT FOR DISCUSSIONS ONLY

MAY 2023



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

August 28, 2023

GWD File: PN.22.3124.00

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 – August 28, 2023 Planning Committee
Statutory Public Meeting – Major Transit Station Areas
Draft Brampton Plan Policies and
Draft Rutherford Road Station MTSA Land Use Plan
Manga (Queen) Inc.

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Manga (Queen) Inc. ("Manga"); the Registered Owner of the property municipally known as 249 Queen Street East in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located at the southeast corner of Queen Street East and Hansen Road, and is located within the Rutherford 'Primary' Major Transit Station Area ("MTSA").

Manga has submitted an Application to Amend the City of Brampton Zoning By-law in April 2023 – City File No. PRE-2022-0023 ("Amendment Application"). The Amendment Application is currently undergoing the required Completeness Review stage of the Application process, and is expected to be deemed complete by the City of Brampton shortly. The Statutory Public Meeting will be scheduled thereafter. The Manga Amendment Application proposes the redevelopment of the subject site for a 38-storey, 394-unit mixed use residential/retail building.

The Amendment Application, as submitted, have been advanced in the context of the current, in-force City of Brampton Official Plan/Secondary Plan policies pertaining to the subject site and MTSA's.

Manga has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, Manga's participation in the Rutherford

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MTSA Focus Group Session that was hosted by City Planning Staff on March 23, 2023, and through formal written correspondence prepared by GWD on behalf of Manga to the City's Planning and Development Committee dated April 24, 2023 and July 18, 2023.

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.

Rutherford Road Station 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 Rutherford Road 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 'Mixed-Use (High-Rise Residential)' pursuant to the revised Draft Rutherford Road Station MTSA Land Use Plan. Generally, we are supportive of this designation as it would appear to be consistent with the Manga Amendment Application.

We are also generally supportive of the Mixed-Use Areas policies. Similar to the comments above, the policies appear to be consistent with the Manga Amendment Application. In this regard, we recommend that in subsection b), that the word "required" be replaced with the words "shall be encouraged." We support the removal of references to maximum density and heights.

- 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

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

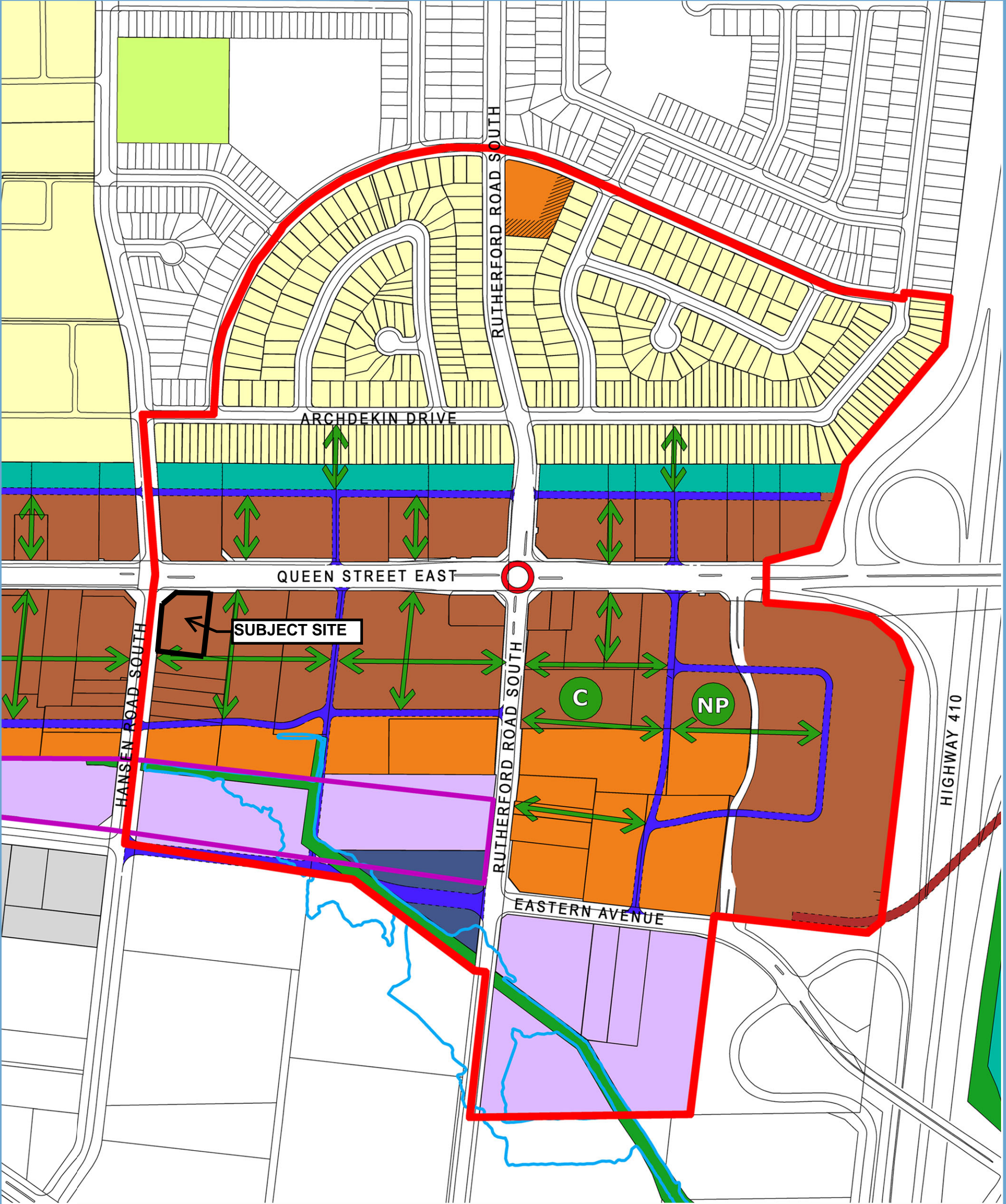


Should you have any questions, please contact the undersigned.

Yours truly,

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

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LEGEND

- NEIGHBOURHOOD (LOW-RISE RESIDENTIAL)

MIXED-USE (MID-RISE MIXED-USE)

MIXED-USE (HIGH-RISE MIXED-USE)

EMPLOYMENT (PRESTIGE INDUSTRIAL)

EMPLOYMENT (INDUSTRIAL)

EMPLOYMENT (FIRE STATION)

PROPOSED PEDESTRIAN BRIDGE
- NATURAL HERITAGE SYSTEM

PARKS AND OPEN SPACE (NEIGHBOURHOOD PARK)

PROPOSED LANDSCAPE BUFFER

SPECIAL POLICY AREA

TRCA FLOODLINE

NP
PROPOSED NEIGHBOURHOOD PARK

C
POTENTIAL COMMUNITY HUB
- PROPOSED PUBLIC OR PRIVATE STREET NETWORK

MID-BLOCK CONNECTION

HEIGHT TRANSITION AREA

MTSA BOUNDARY

MTSA STATION
- 0

100

200

Metres
- N

E

S

W

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

BRAMPTON MAJOR TRANSIT STATION AREAS
RUTHERFROD ROAD STATION DRAFT LAND USE PLAN