



APPENDIX #3



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

October 23, 2023

GWD File: PN.22.3238.00

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'
17-35 Railroad Street, 48-50 Mill Street North, and
55-59 Elizabeth Street North
23 Railroad Inc., 17595031 Railroad ME Inc. and
5519273548 Railroad ME Inc.

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to 23 Railroad Inc., 17595031 Railroad ME Inc. and 5519273548 Railroad ME Inc. ("Client"); the Registered Owner of the properties municipally known as 17-35 Railroad Street, 48-50 Mill Street North, and 55-59 Elizabeth Street North in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located on the south side of Railroad Street, between Mill Street North and Elizabeth Street North, and is located within the Brampton GO Station 'Primary' Major Transit Station Area ("MTSA").

Our Client is currently preparing redevelopment plans for the subject site, and a Pre-Application Consultation with City of Brampton Planning Staff was recently held on August 16, 2023 – City File PRE-2023-0089. Our Client is desirous of redeveloping the subject site for a transit-supportive, high density high-rise mixed-use residential/retail development. The proposal and concept plan layout will be refined as we work through the Development Application process.

Our Client has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, our Client's participation in the Brampton GO Station MTSA Focus Group Session that was hosted by City Staff on May 11, 2023, and through formal written correspondence prepared by GWD on behalf of our Client to the City's Planning and Development Committee dated February 13, 2023, April 24, 2023, July 17, 2023 and August 28, 2023 (a copy of prior written correspondence to the City of Brampton is attached to this letter in **Appendix 1**).

Our Client is an Appellant of City of Brampton Official Plan Amendment OP2006-247.

We write to express our Client'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';
 - 'Urban Centres' Overlay;
 - 'Community Areas';
 - Adjacent to 'Transit Station'.
- Schedule 2 - Designations:
 - 'Mixed Use'.
- Schedule 13b – Brampton Major Transit Station Areas KIT-3 – Brampton GO 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 our Client. The concerns raised in previous correspondence (**Appendix 1**), continue to be raised through this submission to the City of Brampton. In addition, our Client 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 and concerns (**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.

- 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.
- Policy 3.1.1.57 d) speaks to tower floorplates for primarily residential towers should be no larger than 800 square metres. We recommend that this policy be revised to include a provision to allow for larger footplates in extenuating circumstances caused by the actions of public bodies (i.e. ROW taking).
- 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,

A handwritten signature in black ink, appearing to read 'A. Walker', with a long horizontal flourish extending to the right.

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

cc: 23 Railroad Inc.
17595031 Railroad ME Inc.
5519273548 Railroad ME Inc.
M. Foderick, McCarthy Tetrault LLP
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

February 13, 2023

GWD File PN 23.3238.00
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

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to our Client who is representing the owners of 17, 19, 23, 27, 31 and 35 Railroad Street, 48 and 50 Mill Street North and 55 and 59 Elizabeth Street North, 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 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 Brampton GO 'Primary' MTSA.

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.

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On behalf of our Client 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 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.
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.
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 (Brampton GO MTSA). 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. 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: **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 23.3238.00
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)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to our Client who is representing the owners of 17, 19, 23, 27, 31 and 35 Railroad Street, 48 and 50 Mill Street North and 55 and 59 Elizabeth Street North, in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located in the Brampton 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.

City-Initiated Official Plan Amendment - MTSA

On behalf of our Client, 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

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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. Lastly, we request notification of the passage of any and all By-laws and/or Notices on this matter.

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: Anthony Sirianni, Gagnon Walker Domes Ltd.
Harjap Singh, Gagnon Walker Domes Ltd.**



Principals

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July 17, 2023

GWD File: PN.22.3238.00

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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 Brampton GO Station MTSA Land Use Plan
17-35 Railroad Street, 48-50 Mill Street North, and
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Our Client is currently preparing redevelopment plans for the subject site, and a Pre-Application Consultation with City of Brampton Planning Staff was recently filed with the City of Brampton on July 5, 2023 – City File PRE-2023-0089. Our Client is desirous of redeveloping the subject site for a transit-supportive, high density high-rise mixed-use residential/retail development. The proposal and concept plan layout will be refined as we work through the Development Application process.

Our Client has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to, our Client's participation in the Brampton GO Station MTSA Focus Group Session that was hosted by City Staff on May 11, 2023, and through formal written correspondence prepared by GWD on behalf of our Client to

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the City's Planning and Development Committee dated February 13, 2023 and April 24, 2023.

Our Client is an Appellant of City of Brampton Official Plan Amendment OP2006-247.

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 Brampton GO Station MTSA Land Use Plan, prior to the preparation of detailed policy associated with these draft Land Use Plans.

Our Client 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.

Brampton GO Station Draft Land Use Plan

Notwithstanding the concerns noted above, GWD has reviewed the Draft Brampton GO 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 'Downtown Mixed-Use – 2 (High Rise)' pursuant to the Draft Brampton GO Station MTSA Land Use Plan. Generally, we are supportive of this designation as it would appear to be consistent with our Client's redevelopment proposal.

However, our Client has significant concerns that no detailed land use planning policy has been advanced in concert with the Draft Brampton GO Station MTSA Land Use Plan. In the absence of any land use and development planning policy direction, it is not possible for our Client to appropriately review, assess and provide meaningful input on the Draft Brampton GO Station MTSA Land Use Plan in the context of our Client's redevelopment proposal, 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 Brampton GO Station MTSA Land Use Plan, it is our opinion that any consideration of the Draft Brampton GO Station MTSA Land Use Plan by Planning and Development Committee or City Council is premature.



Closing Remarks

In consideration of the above noted concerns, our Client does not support the Planning Department's intent to table the Draft Brampton GO Station MTSA Land Use Plan for Planning and Development Committee/City Council's consideration at this time.

Our Client 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.

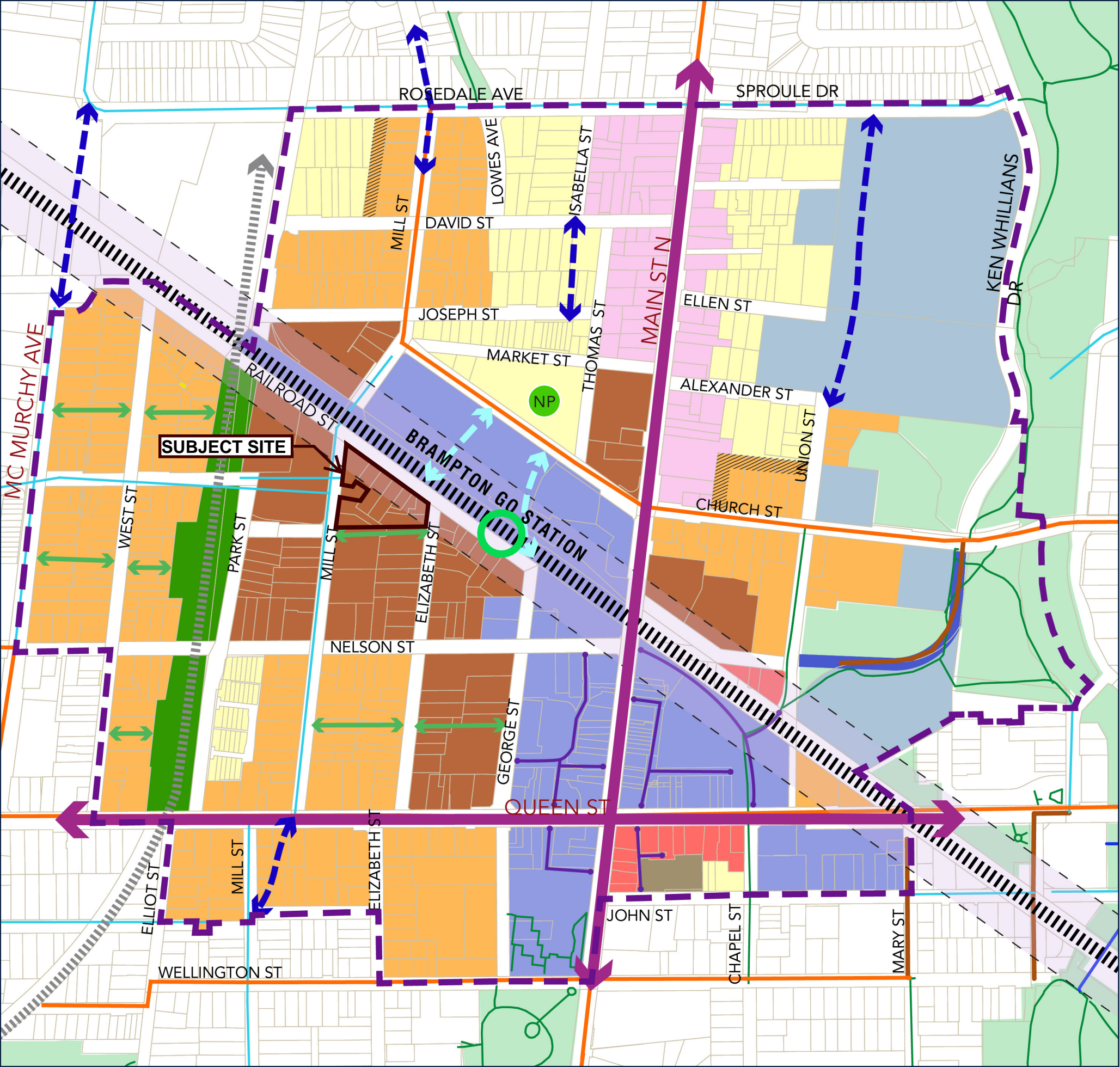
Yours truly,

A handwritten signature in black ink, appearing to read 'Andrew Walker'.










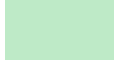


















Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner and Principal Planner

cc: 23 Railroad Inc.
17595031 Railroad ME Inc.
5519273548 Railroad ME Inc.
M. Foderick, McCarthy Tetrault LLP
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.

PROPOSED LAND USE PLAN

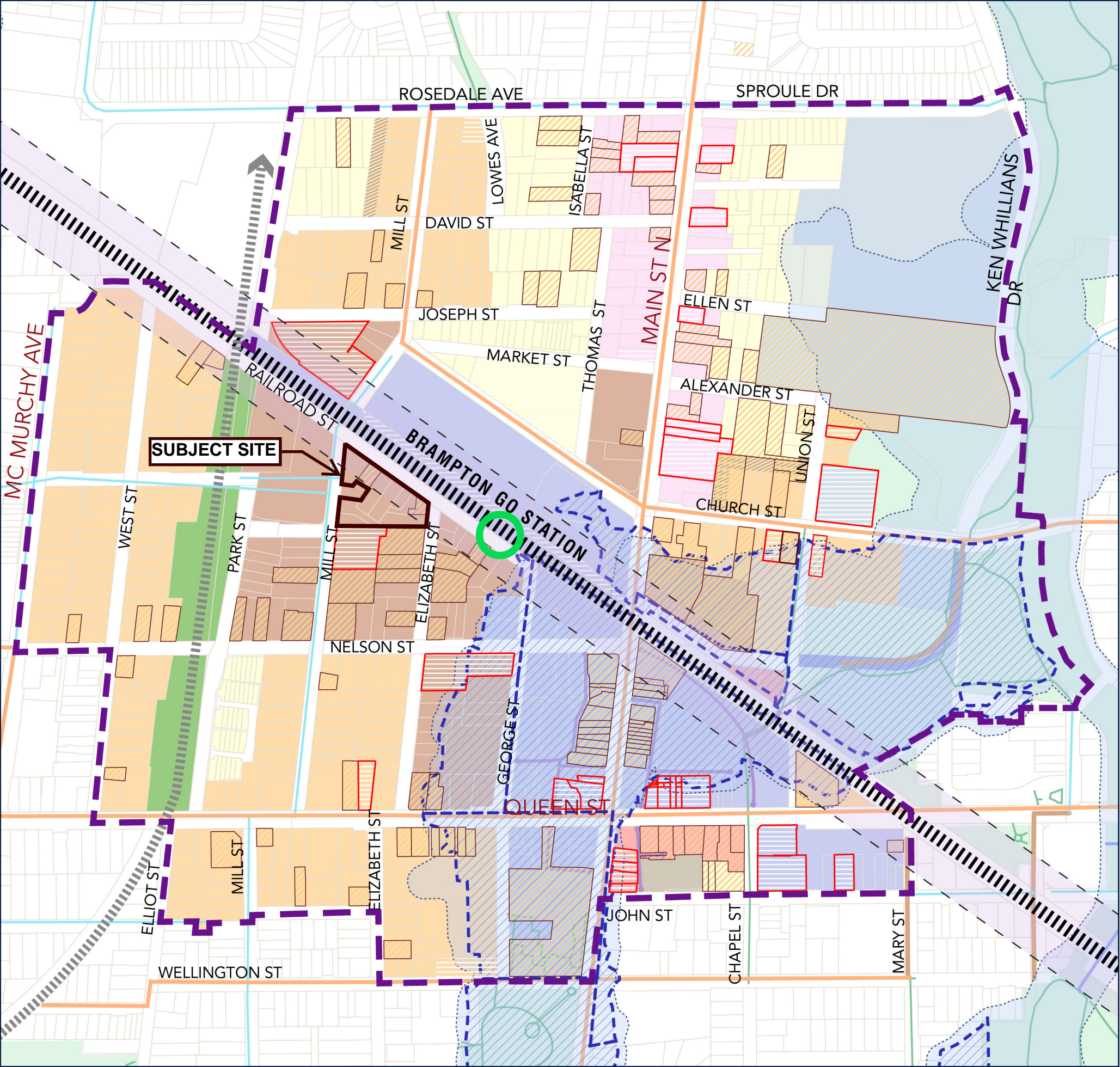


LEGEND

 DOWNTOWN MIXED USE 1	 RAILWAY 30M BUFFER	 MTSA BOUNDARY	 SHARED ROADWAY
 DOWNTOWN MIXED USE -2 (HIGH RISE)	 INSTITUTIONAL	 MTSA STATION	 RECREATIONAL TRAIL
 HIGH RISE	 EXISTING PARKS	 MID BLOCK CONNECTIONS	 EXISTING NETWORK LINK
 DOWNTOWN MIXED USE-3 (MIDRISE)	 DPS AREA	 HEIGHT TRANSITION AREA	 BIKE LANE BUFFERED/ DESIGNATED
 LOW RISE MIXED USE	 RAILWAY TRACK	 POSSIBLE CONNECTIONS	 CITY LANEWAYS
 LOW RISE RESIDENTIAL	 NEIGHBORHOOD PARK	 PEDESTRIAN UNDER PASS	
 PROPOSED ROAD EXTENSIONS	 PROPOSED TO BE DECOMMISSIONED OBRY LINE	 HIGHER ORDER TRANSIT CORRIDOR	
 PROPOSED OPEN SPACE		 POSSIBLE BLOCK CONFIGURATION	



PROPOSED LAND USE PLAN WITH HERITAGE OVERLAY



LEGEND

-  LISTED HERITAGE OVERLAY
-  DESIGNATED HERITAGE OVERLAY
-  FLOOD PLAIN
-  SPECIAL POLICY AREA





Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

August 28, 2023

GWD File: PN.22.3238.00

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 Brampton GO Station MTSA Land Use Plan
17-35 Railroad Street, 48-50 Mill Street North, and
55-59 Elizabeth Street North
23 Railroad Inc., 17595031 Railroad ME Inc. and
5519273548 Railroad ME Inc.

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to 23 Railroad Inc., 17595031 Railroad ME Inc. and 5519273548 Railroad ME Inc. ("Client"); the Registered Owner of the properties municipally known as 17-35 Railroad Street, 48-50 Mill Street North, and 55-59 Elizabeth Street North in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located on the south side of Railroad Street, between Mill Street North and Elizabeth Street North, and is located within the Brampton GO Station 'Primary' Major Transit Station Area ("MTSA").

Our Client is currently preparing redevelopment plans for the subject site, and a Pre-Application Consultation with City of Brampton Planning Staff was recently held on August 16, 2023 – City File PRE-2023-0089. Our Client is desirous of redeveloping the subject site for a transit-supportive, high density high-rise mixed-use residential/retail development. The proposal and concept plan layout will be refined as we work through the Development Application process.

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

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**CONFIDENTIALITY
CAUTION**

This document is Consultant-Client privileged and contains confidential information intended only for person(s) named above. Any distribution, copying or disclosure is strictly prohibited. If you have received this document in error, please notify us immediately by telephone and return the original to us by mail without making a copy.



GO Station MTSA Focus Group Session that was hosted by City Staff on May 11, 2023, and through formal written correspondence prepared by GWD on behalf of our Client to the City's Planning and Development Committee dated February 13, 2023, April 24, 2023 and July 17, 2023.

Our Client is 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.

Brampton GO Station Draft Land Use Plan

GWD has reviewed the August 28, 2023 Information Report, including the proposed MTSA Policies and the revised Draft Brampton 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 'Mixed-Use Areas (High Rise)' 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 our Clients redevelopment proposal.

We are also generally supportive of the Mixed-Use Areas policies. Similar to the comments above, the policies appear to be consistent with our Client's redevelopment proposal. 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

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



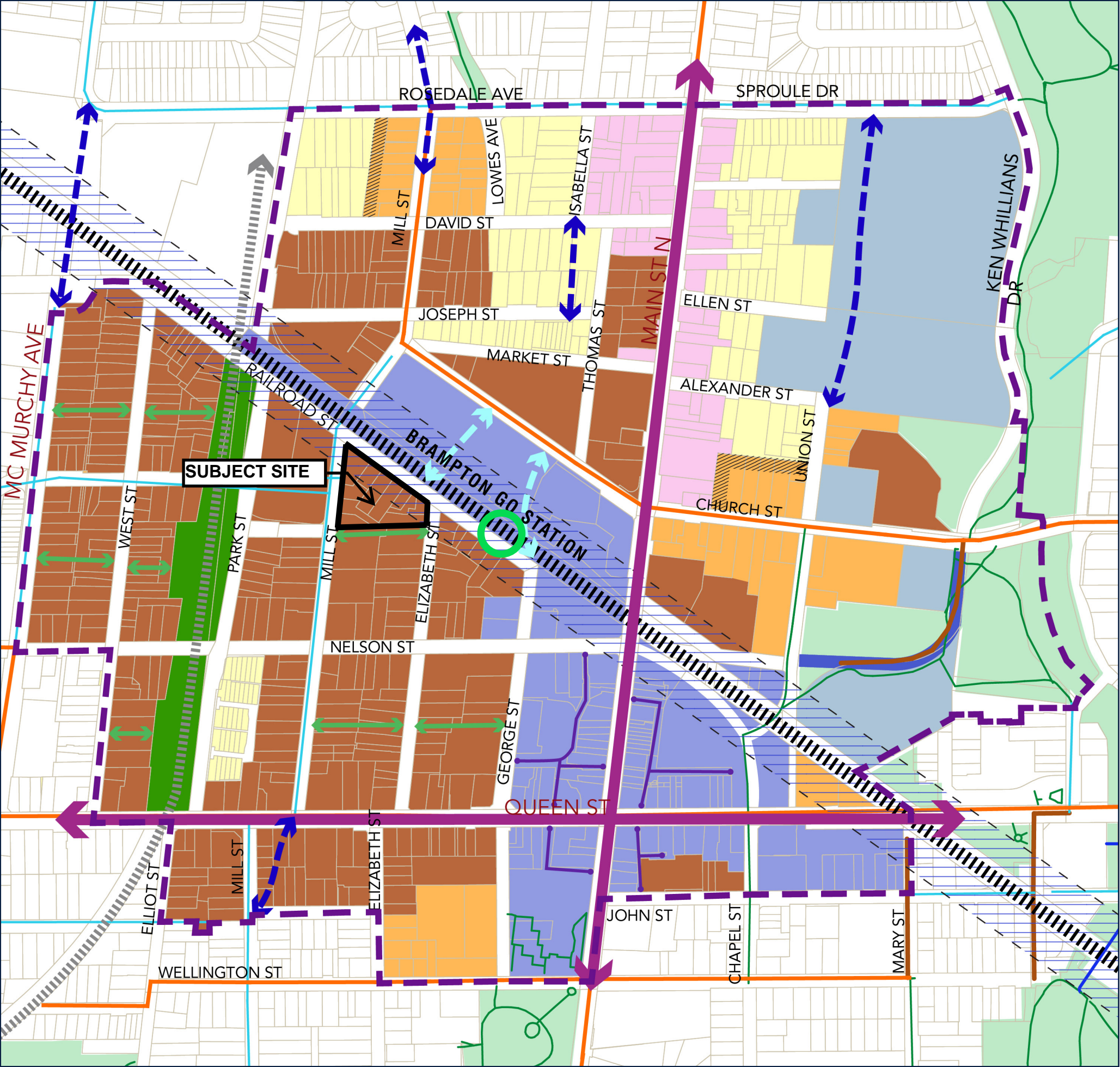
Should you have any questions, please contact the undersigned.

Yours truly,








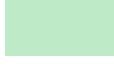













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PROPOSED LAND USE PLAN



LEGEND

- | | | |
|---|---|---|
|  MIXED USE AREAS (DOWNTOWN MIXED USE) |  RAILWAY 30M BUFFER |  MTSA BOUNDARY |
|  MIXED USE AREAS (HIGH RISE) |  NEIGHBORHOODS (INSTITUTIONAL) |  MTSA STATION |
|  MIXED USE AREAS (MIDRISE) |  PARKS AND OPEN SPACE (CITY PARK) |  MID BLOCK CONNECTIONS |
|  MIXED USE AREAS (LOW RISE) |  DPS AREA |  HEIGHT TRANSITION AREA |
|  NEIGHBORHOODS (LOW RISE) |  RAILWAY TRACK |  PROPOSED STREET NETWORK |
|  EXISTING ROAD EXTENSION |  PROPOSED TO BE DECOMMISSIONED OBYR LINE |  PEDESTRIAN UNDER PASS |
|  PROPOSED/EXISTING OPEN SPACE |  CITY LANEWAYS |  HIGHER ORDER TRANSIT CORRIDOR |



BRAMPTON MAJOR TRANSIT STATION AREAS

BRAMPTON GO DRAFT LAND USE PLAN

DRAFT FOR DISCUSSION ONLY | JUNE 2023