



Principals

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September 9, 2024

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The Corporation of the City of Brampton
2 Wellington Street West
Brampton, Ontario
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Attention: Mayor and Members of City of Brampton Planning and Development Committee/City Council

- and -

Genevieve Scharback, City Clerk

**Subject: PUBLIC INPUT – LETTER OF CONCERN
285 and 295 Queen Street East
Starbank Developments 285 Corp.
Item 5.1: September 9, 2024 Planning and Development Committee Meeting; Information Report: Primary Major Transit Station Areas – City-Initiated Official Plan Amendments**

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Starbank Developments 285 Corp. ("Starbank"); the Registered Owner of the properties known municipally as 285 and 295 Queen Street East in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located at the southwest corner of Queen Street East and Highway 410, and is located within the QUE-3 Rutherford 'Primary' Major Transit Station Area ("MTSA"). An Aerial Photo illustrating the location of the subject site is in **Appendix 1**.

We would like to take this opportunity to express Starbank's concerns regarding the City Staff Report entitled "Information Report: Primary Major Transit Station Areas – City-Initiated Official Plan Amendments; Queen Street Corridor Secondary Plan Area 36, Bram West Secondary Plan Area 40, The Gore Secondary Plan Area 41, Mount Pleasant Secondary Plan Area 51", along with its various attachments including:

- The Draft Official Plan Amendment ("OPA");
- New Draft Queen Street Transit Corridor Secondary Plan Area 10 ("Queen Street Secondary Plan");
- New Queen East Precinct Plan ("Precinct Plan"); and
- New Draft Queen East Precinct Plan Guidelines ("Precinct Plan Guidelines" or the "Guidelines").

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The Information Report is scheduled to be considered at the September 9, 2024 City of Brampton Planning and Development Committee Meeting.

We request the opportunity for City staff to meet with Starbank and its core consulting team at the earliest opportunity to discuss the concerns as outlined herein; including, but not limited to: the proposed OPA's, the Queen Street Secondary Plan policies, Precinct Plan elements, and the Guidelines' inconsistency with City Council's previous approval of the MTSA Land Use Schedule in the new Brampton Official Plan, and with the plans prepared and shared to-date with City Staff through Pre-Consultation Application PRE-2024-0012 for the comprehensive redevelopment of the subject site.

BACKGROUND

Starbank's Engagement in City of Brampton Official Plan Review Process

Starbank has been actively engaged in the City of Brampton's Official Plan Review process and associated MTSA Planning Study. This has included, but is not limited to, Starbank's participation in the Rutherford MTSA Focus Group Session that was hosted by City Staff on March 23, 2023, and the recent MTSA Open House on May 14, 2024, and through formal written correspondence prepared by GWD on behalf of Starbank to the City's Planning and Development Committee dated February 10, 2023, April 24, 2023, July 17, 2023, August 28, 2023, October 20, 2023, April 8, 2024 and July 8, 2024.

Starbank Re-Development Application Process

Starbank has put forward a vision for redeveloping the subject site for a transit-oriented mixed use high-density Master Plan development. The proposal and concept plan layout will be refined as we work through the Development Application process.

Starbank participated in a Pre-Application Consultation with City of Brampton Planning Staff on February 27, 2024 (City File No. PRE-2024-0012). Starbank currently plans to redevelop the subject site with a transit-oriented, mixed-use Master Plan with multiple tall buildings. A formal Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are scheduled to be submitted to the City before the end of 2024.

Starbank's Appeal of Brampton Plan

On June 4, 2024, Starbank appealed the City's/Regional Council's adoption/approval of the new Brampton Plan to the Ontario Land Tribunal ("OLT") in light of Starbank's concerns with the Brampton Plan having not been sufficiently addressed prior to its adoption (OLT-000688). Starbank's concerns with the Brampton Plan include, but are not limited to, compatibility and transition requirements that render appropriate intensification unduly difficult, including policies that would limit densities and heights alongside major investments in transit infrastructure.



Starbank's Appeal of City of Brampton Official Plan Amendment OP2006-247

Starbank has also appealed the City of Brampton's decision to adopt Official Plan Amendment OP2006-247, being the Interim MTSA policies to the 2006 Brampton Official Plan, to the OLT (OLT-23-00609).

CITY of BRAMPTON INFORMATION REPORT and STATUTORY PUBLIC MEETING

The City of Brampton Planning Department is holding a Statutory Public Meeting and is tabling the Information Report to the September 9, 2024 Planning and Development Committee Meeting. The purpose of the Statutory Public Meeting is for City Staff to present proposed City-Initiated OPA's to the Queen Street Corridor Secondary Plan, Hurontario-Main Corridor Secondary Plan and other Secondary Plans to include a new proposed policy framework for twelve (12) of the City's MTSA's.

Public input on the proposed OPA's is being sought by the City at the Statutory Public Meeting in advance of their consideration for final adoption by City Council, which is currently targeted in November 2024.

OVERVIEW of STARBANK'S COMMENTS and CONCERNS

The following provides an overview of Starbank's preliminary concerns with respect to the City Planning Department's Information Report; including: the proposed OPA pertaining to the Draft Queen Street Secondary Plan, Draft Precinct Plan and Draft Precinct Plan Guidelines.

The Strategic Transportation and Master Stormwater Study for the City of Brampton Major Transit Station Area (MTSA) Policy Framework, completed by Arup Canada Inc. is contained in Attachment 2 of the Information Report ("Transportation/SWM Study"). Given the technical nature of the Transportation/SWM Study, Starbank reserves the right to make additional submissions to the City on this document at a later date.

General Comments and Concerns

- OPA is Premature – As a result of the various appeals to the Brampton Plan, including that filed by Starbank, the Brampton Plan is not in full force and effect. We understand that the City's Planning Department anticipates tabling a Final Recommendation Report to seek City Council endorsement of the proposed OPA, Draft Queen Street Secondary Plan, Draft Precinct Plan and Draft Precinct Plan Guidelines in November 2024.

Starbank has a fundamental concern about the prematurity of any City Council endorsement or adoption of the OPA and related planning documents noted above in the absence of Starbank's resolution of its OLT Appeals to the Brampton Plan and Official Plan Amendment OP2006-247.

- Disregard for Starbank Proposed Master Plan – the Draft OPA, Secondary Plan policies, Precinct Plan and Guidelines disregard and are inconsistent with the



Starbank Master Plan which was reviewed and assessed through a formal Pre-Application Consultation with City of Brampton Planning Staff on February 27, 2024 (City File No. PRE-2024-0012). A formal Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are scheduled to be submitted to the City of Brampton in 2024.

- *Fails to Recognize Previous Starbank Concerns* – The Draft OPA, Secondary Plan policies, Precinct Plan and Guidelines fail to address Starbank's previous concerns, as identified through the Brampton Plan and MTSA/Precinct Planning Study.

Comments and Concerns with Information Report

- *Inaccurate Summary of the Extent of the OPAs* – We note that the title of the Information Report, Staff Recommendation 1, and Pages 2 and 6 are inaccurate, as they fail to properly make reference to the full range of existing Secondary Plans that are impacted by City Staff Recommendations and the associated OPAs.
- *Status of Brampton Plan MTSA Land Use Plan/OLT Appeal* – Bullet 1 of the Overview Section on Page 1 and the Background Section of the Information Report notes that sixteen (16) OLT Appeals were filed in connection with City Council's adoption of the Brampton Plan; however, the Information Report suggests that only the Bramalea GO MTSA and Gateway Terminal MTSA land use schedules of the Brampton Plan are subject to these OLT Appeals. This statement is incorrect, as the scope of Starbank's OLT Appeal of the Brampton Plan also includes the Rutherford MTSA Land Use Plan (Schedule 13f).
- *Maximum Height and Density Permissions/Restrictions* – We acknowledge the statements on Pages 2 and 6 of the City's Information Report, which clarifies that maximum building height and density policies and schedules will not be included in the Draft Secondary Plans/OPAs, and only contain general guiding policies on built form and density. The Information Report further clarifies that the conceptual diagrams/figures and design guidelines identified within the Precinct Plan Guidelines are provided for illustrative purposes only, and are not to be considered determinative or policy during the review of formal development proposals. Specific maximum building height and density is intended to be determined through the future Zoning By-law/Zoning By-law Amendments only.

Notwithstanding, based on our review of the Draft Secondary Plan, it is our position that the OPAs and Draft Secondary Plans do not effectively or clearly make this distinction between the non-policy intent of the Precinct Plan and Guidelines. It is our opinion that if the Precinct Plan Guidelines are intended to be treated as guidelines only, and not policy, they should not form any part of the Secondary Plan Policy other than through reference as a standalone Guideline that is to be considered during the review of development applications.



Comments and Concerns with the Draft Queen Street Transit Corridor Secondary Plan Area 10

OPA

- Typographic Error – Sections 2.2 a) and 2.4 a) of the OPA contain typographic errors. Specifically, these Sections reference the wrong Schedules of the OPA.
 - **Requested Modification: Revise Section 2.2 a) to reference Schedule E to the OPA, and revise Section 2.4 a) to reference to Schedule C of the OPA.**
- Absence of Land Use Plan – Section 2.6 of the OPA proposes the deletion of the Queen Street Corridor Secondary Plan in its entirety and its replacement with the new proposed Queen Street Transit Corridor Secondary Plan. However, the OPA and Secondary Plan fail to include a Land Use Plan for the new proposed Secondary Plan. In the absence of a Land Use Plan, conformity between the Brampton Plan, the Secondary Plan and Precinct Plan Guidelines cannot be determined.
 - **Requested Modification: Include Secondary Plan Land Use Plan Schedule to the OPA and Draft Queen Street Transit Corridor Secondary Plan.**
- Precinct Plan Policy and Precinct Plan Guidelines – It is our understanding that Section 12.0 and the policies of the 'Queen East Precinct Plan – Area 10-1', and Schedule 10(a): Queen East Precinct Plan are intended to form Secondary Plan policy, whereas Appendix A, being the Precinct Plan Guidelines are intended to be utilized as development guidelines that conceptually illustrate the City's general intent of the aforementioned proposed Secondary Plan policies. However, the title of Appendix A does not include a specific reference to it being a guideline document, which is confusing.
 - **Requested Modification: Revise the title of Appendix A to read as follows: "Queen East Precinct Plan Guidelines".**

Section 1.0 – Introduction

- Policy 1.2 iii) states that the Secondary Plan will include Precinct Plans that provide explanatory goals and illustrative graphics. As no illustrative graphics are provided on Schedule 10(a), being the actual Queen East Precinct Plan, we assume this Policy is referencing the illustrative graphics contained within the Precinct Plan Guidelines. As the Guidelines are not to be considered policy, they should form a separate document to the Secondary Plan.
 - **Requested Modification: Revise Policy 1.2 iii) to refer to the Precinct Plan Guidelines, rather than the Precinct Plans, and clarify that the Guidelines do not form part of the Secondary Plan.**



Section 2.0 – Vision and Guiding Principles

- Policy 2.0 a) refers to a portion of the Downtown Brampton Urban Centre and the entirety of the Bramalea Urban Centre as being located within the Queen Street Transit Corridor Secondary Plan. However, this Policy fails to recognize that a portion of the City of Brampton Urban Growth Centre is also located within the Secondary Plan area. The Brampton Urban Growth Centre is identified by the Province as being a Provincially significant Strategic Growth Area that shall accommodate the tallest buildings and highest densities in the City.
 - **Requested Modification: Revise Policy 2.0 a) by including the words “including the Brampton Urban Growth Centre” after the words “Urban Centres” in the 3rd and 4th sentence of the Policy.**

Section 3.0 – Population and Jobs

- Table 1 of the Draft Secondary Plan identifies the minimum combined population and jobs target of 160 people and jobs combined per hectare for the Secondary Plan’s seven (7) MTSA’s. However, Table 1 fails to recognize that the City of Brampton’s Urban Growth Centre, as a whole, is required by the Growth Plan to achieve the minimum density target of 200 people and jobs per hectare prior to the year 2031.
 - **Requested Modification: Revise Table 1 by including a new column identifying the additional combined population and jobs required by 2031 to meet the minimum density target for the City of Brampton’s Urban Growth Centre.**

Section 4.0 – Land Use

- Policy 4.0 a) states that “The use of land within the Secondary Plan area shall be in accordance with the Brampton Plan MTSA Land Use Schedules 13d-13j.” Further, the Draft Secondary Plan repeatedly states that the Secondary Plan is intended to be in accordance with the MTSA Land Use Schedules of the Brampton Plan (see Section 1.0 and the Explanatory Note of the OPA, and Section 1.0, Policy 12.0 a), and Policy 12.1 a) of the Secondary Plan). We note that Schedule 10(a), being the Draft Queen East Precinct Plan, is inconsistent with the Rutherford MTSA Land Use Plan (Schedule 13f of the Brampton Plan).
 - **Requested Modification: Revise the Precinct Plan and Precinct Plan Guidelines to include the entire subject site within the Queen Transit Corridor Character Area.**
- Policy 4.0 c) states that “The Zoning By-law, in conjunction with the Urban Design Guidelines will establish the minimum criteria for assessing the suitability of an individual site for each land use designation.” The proposed policy language indicates that the suitability of a land use designations will be determined by the Zoning By-law and Urban Design Guidelines. However, a Zoning By-law is



required to conform to and implement the land use designations already identified within the applicable Official Plan/Secondary Plan.

- **Requested Modification: Delete the last sentence of Policy 4.0 c).**

Section 5.0 – Built Form, Height and Density

- Policy 5.1 d) i) outlines certain built form and environmental impact considerations pertaining to tall buildings.
 - **Requested Modification: Revise Policy 5.1 d) i) by including the word “adverse” between the words “mitigate” and “environmental impacts”.**
- Policy 5.1 e) ii) stipulates that service and parking facilities shall be integrated into proposed buildings, which prohibits the ability for developments to provide limited surface parking where deemed appropriate through the detailed design process.
 - **Requested Modification: Revise Policy 5.1 e) ii) to permit limited off-street surface parking, as determined to be appropriate at the detailed design stage.**
- Policy 5.2 c) stipulates that the maximum building height and density permissions that are to be included within the Zoning By-law will be restricted to the range of heights and density distribution as illustrated in the Precinct Plan Guidelines. This Policy should be deleted as it is inconsistent with City Staff’s previously stated intention that: i) maximum building heights and densities will not be established within the Secondary Plan, and ii) that the Precinct Plan Guidelines are illustrative only and are not intended to form planning policy. As worded, Policy 5.2 c) provides very rigid policy restrictions on potential building heights and density distribution that are inconsistent with Starbank’s Master Plan proposal.
 - **Requested Modification: Delete Policy 5.2 c).**
- Policy 5.2 d) identifies criteria that must be met in order to consider building heights and densities beyond those prescribed by the Zoning By-law for only those lands designated ‘Neighbourhood (High-Rise Residential)’ or ‘Mixed-Use (High-Rise Mixed-Use)’. This Policy suggests that any Zoning By-law Amendment Application that proposes an increase in height or density on lands that are not designated either ‘Neighbourhood (High-Rise Residential)’ or ‘Mixed-Use (High-Rise Mixed-Use)’ may not be considered. This is inconsistent with the *Planning Act*, which provides proponents with the legal right to make applications for Council’s consideration pertaining to a proposed change in land use and/or an increase in height or density for all designations.

Additionally, the criterion identified in this draft Policy is overly prescriptive as it requires proposals to meet all stipulated policies rigidly. Flexibility should also be included within the policy language to allow for the general and overall intent of the



criterion to be achieved rather than the strict adherence to each and every listed development criteria.

Further, the City-initiated Zoning By-law that is intended to implement the Brampton Plan and Secondary Plans is not scheduled to be released by City Staff for initial public review and comment until 2025. Therefore it is not possible for Starbank to assess the appropriateness of this Policy and provide meaningful comment in the absence of understanding what Zoning prescriptions are proposed from a height and density perspective.

➤ **Requested Modification: Delete Policy 5.2 d).**

Section 6.0 – Public Realm

- Policy 6.0 d) is incomplete.

Section 7.0 – Mobility and Transportation

- Policy 7.1 b) speaks to the creation of a public street network as “generally illustrated” on Precinct Plan Schedule 10(a). Flexibility should be included into the policy language to confirm that deviations to the illustrated public street network will not require an amendment to the Precinct Plan Schedule/Secondary Plan.

➤ **Requested Modification: Revise Policy 7.1 b) to include the following wording at the end of the Policy: “changes to the location or alignment of the street network will not require an amendment to this Plan provided that its general intent and purpose is maintained”.**

- Policy 7.1 e) directs that new public streets within the subject site shall be 20 metres in width and that the cross-section for these public rights-of-way are contained within the Precinct Plan Guidelines.

➤ **Requested Modification: Revise Policy 7.1 e) to replace the words “is found in Appendix A to this Plan” with “is conceptually illustrated in the Precinct Plan Guidelines. The ultimate cross-section shall be determined at the detailed design stage”.**

- Policy 7.1 g) stipulates that private streets shall provide a minimum pavement width of 7.0 metres plus sidewalks on both sides of the private street, plus active transportation elements, plus landscaped boulevards. This requirement for private streets is excessive and goes well beyond the function of a private street/laneway, which typically range between 6.0 to 7.0 metres in width. Private streets and laneways, and their functional requirements, should be determined at the detailed design stage.

➤ **Requested Modification: Delete Policy 7.1 g).**



- Policy 7.1 h) requires that Mid-Block Connections shall have a minimum width of 15.0 metres. The typical function of a Mid-Block Connection is to provide passive active transportation linkages between streets and places of destination. On this basis, the minimum 15.0 metre requirement to provide pedestrian linkages throughout the Precinct Plan is excessive and unnecessary. Further, we question why Figure 5.3.3 S3 of the Precinct Plan Guidelines pertaining to Mid-Block Connections includes automobile lanes.

➤ **Requested Modification: Delete Policy 7.1 h).**

- Policy 7.3 b) prohibits at-grade parking fronting a street. The location of parking should be flexible and determined at the detailed design stage on a case-by-case basis.
 - **Requested Modification: Revise Policy 7.3 b) to replace the words “shall not be” with “are discouraged to be”, and the following words added to the end of the Policy: “limited at-grade parking fronting a street may be considered on a case-by-case basis, to be determined at the detailed design stage”.**

Section 10.0 – Sustainability

- Policy 10.0 a) requires Draft Plan of Subdivision and Site Plan Applications to achieve a minimum Sustainability Score Threshold of ‘Silver’. Insufficient justification has been provided to require that sites within MTSAs need to meet a higher Sustainability Score Threshold than all other areas of the City. Additionally, transition policies should be incorporated into the policy language to exempt active applications and allow upcoming planning applications to be reviewed and processed based on the current ‘Bronze’ Sustainability Score Threshold requirement.
 - **Requested Modification: Delete Policy 10.0 a) and replace with the following: “New Draft Plan of Subdivision and Site Plan Applications submitted after January 2027 must achieve a minimum Sustainability Score that falls within the Silver Sustainability Score Threshold”.**
- Policy 10.0 b) requires that development advance the implementation and achievement of low/zero carbon energy, district energy systems, renewable and alternative, and other sustainable development measures. This requirement should be aspirational and the policy language should be revised to reflect this.
 - **Requested Modification: Revise Policy 10.0 b) to replace the words “Development will” with “Development is encouraged to”.**
- Policy 10.0 c) requires that new development facilitate transit electrification in the design of buildings. This Policy is inappropriate as it is not the responsibility of private development proposals or development proponents to facilitate transit electrification through building development.



- **Requested Modification: Delete Policy 10.0 c) and replace with the following: “Development is encouraged to facilitate the provision of vehicle charging infrastructure”.**

Section 12.0 – Precinct Plans

In accordance with Schedule B to the OPA, the subject site is located within the ‘Queen East Precinct Plan Area 10-1’.

Schedule 10(a), being the ‘Queen East Precinct Plan’ (following the Precinct Plan Area 10-1 policies) does not include a title or legend to explain the various overlays provided on the Schedule. In order to be able to provide comment on the Precinct Plan, a legend must be included.

Notwithstanding the above, we have made the following assumptions, based on a review of the Precinct Plan Guidelines contained within Appendix A to the Draft Secondary Plan:

- The subject site is located within the ‘Community Node’;
- A ‘Neighbourhood Park’ is identified as being required within the subject site; and
- A ‘Linear Connection’ and a ‘Mid-Block Connection’ is identified at the west limits of the subject site, connecting with a future internal public road.

Starbank has serious concerns with the Queen East Precinct Plan, as it relates to the subject site, as follows:

- *Disregard of Previous Starbank Pre-Consultation Application and Submission Letters* – The Precinct Plan and related policies disregard and are inconsistent with the Starbank Pre-Consultation Application recently reviewed and assessed with City Staff on February 27, 2024 (City File No. PRE-2024-0012), upon which a formal Official Plan, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are being prepared and soon to be filed with the City. The Draft Precinct Plan (Schedule and Policies) must be revised to recognize and implement the specific land use and development policies pursuant to Starbank’s redevelopment plans for the subject site.

A review of the various plans contained within the Draft Queen East Precinct Plan Guidelines in Appendix A, along with proposed revisions to the various plans, are discussed in the next section of this letter.

- Policy 12.1 references “the policies of Chapters 12-1 and 12-2 of this Plan”. Chapters 12-1 and 12-2 are not specifically labelled in the Secondary Plan. We assume Chapter 12-1 refers to the policies of the Queen East Precinct Plan – Area 10-1. This should be clarified in the Secondary Plan and labelled accordingly.

- **Requested Modification: Revise Policy 12.1 to clearly identify Chapters 12-1 and 12-2.**



Comments and Concerns with the Draft Queen East Precinct Plan Guidelines (Appendix A)

- Precinct Plan Policy and Precinct Plan Guidelines – As noted above, it is our understanding that Appendix A, being the Precinct Plan Guidelines, are intended to be utilized as development guidelines that conceptually illustrate the City's general intent of the proposed Secondary Plan policies. However, the title of Appendix A does not include a specific reference to "Guidelines".
 - **Requested Modification: Revise the title of Appendix A to read as follows: "Queen East Precinct Plan Guidelines".**
- Disclaimer – We acknowledge the disclaimer within the Precinct Plan Guidelines, which confirms that "The images, illustrative renderings and the potential development scenarios contained in the Queen East Precinct Plan are meant to show examples and are one of many potential development approaches to achieve transit-oriented development. The images do not imply that development will occur or can be approved exactly as shown".
 - **Requested Modification: Revise the last sentence of the Disclaimer to read as follows: "The images, illustrative renderings, potential development scenarios, building heights, density distribution, street network and open space network contained herein do not imply that development will occur exactly as shown. The Queen East Precinct Plan Guidelines are intended to inform, but are not formally part of, the Queen Street Transit Corridor Secondary Plan".**
- MTSA Land Use Schedule – Section 1.0 of the Guidelines includes the MTSA Land Use Schedule. Generally, Starbank is supportive of the 'Neighbourhood (High-Rise Residential)' designation across the whole of the subject site. The Neighbourhood Park and Community Hub locations have been proposed to be revised (as described below) to reflect proposed revisions to the Precinct and Demonstration Plans (as described in separate sections below). Community uses are not best placed in locations that are better suited for buildings with greater height and density, and the proposed revision with respect to their location places them in closer proximity to other civic/institutional uses, are more central to this area of the Precinct Plan, and allows for greater utilization and density along the Queen Street Corridor.

The following revisions are requested (see **Detail A** in **Appendix 2** of this letter):

- **Requested Modification: Replace "Potential Mid-Block Connection" interior to the subject site with "Proposed Public or Private Street Network" from the Land Use Schedule contained within Figure 1.2.**
- **Requested Modification: Delete "Neighbourhood Park" within subject site and move to the west from the Land Use Schedule contained within Figure 1.2.**



- **Requested Modification: Revise Figure 1.2 to move the “Community Hub” notation further south to the northeast corner of Clark Boulevard and Rutherford Road South.**
- Precinct Plan – Section 3.2 of the Guidelines includes the Precinct Plan. Starbank's concerns with the Precinct Plan are outlined above. In addition, the Secondary Plan and the Guidelines do not describe what a “Linear Connection” is. There needs to be a distinction between linear connections between active transportation (walking/cycling/paths) with roads for vehicular traffic.

The following revisions are requested (see **Detail B** in **Appendix 2** of this letter):

- **Requested Modification: Adjust the “Linear Connection” south of Queen Street within the subject site and to the west on the Precinct Plan contained within Figure 3.2.1 consistent with the road connections proposed within the Starbank Master Plan and other proposed applications to the west.**
- **Requested Modification: Replace the “Community Node” designation on the subject site and along the south side of Queen Street East from Rutherford Road South to the Subject Site with “Queen Transit Corridor” from the Precinct Plan contained within Figure 3.2.1.**
- **Requested Modification: Revise Figure 3.2.1 to relocate the “Neighbourhood Park” and “Community Hub” located within the subject site and at the southeast corner of Queen Street East and Rutherford Road South (respectively) further south and west to the northeast intersection of Clark Boulevard and Rutherford Road South from the Precinct Plan contained within Figure 3.2.1.**
- **Requested Modification: Revise Figure 3.2.1 to reflect the road network within the subject site as shown in Detail B in Attachment 2 in this letter on the Precinct Plan contained within Figure 3.2.1.**
- Demonstration Plan – Page 24 of the Guidelines includes the Demonstration Plan (Figure 3.4.2). Starbank has concerns with the Demonstration Plan, insofar as the location of the Community Hub and Neighbourhood Park are inconsistent with the MTSA Land Use Schedule, and the proposed Starbank Master Plan included with the Pre-Consultation Application.

The following revisions are requested (see **Detail C** in **Appendix 2** of this letter):

- **Requested Modification: Adjust the location and orientation of the “Community Hub” and “Neighbourhood Park” to the northeast corner of Clark Boulevard and Rutherford Road South from the Demonstration Plan within Figure 3.4.2.**



- **Requested Modification: Replace the conceptual building layout with the subject site to reflect the proposed Starbank Master Plan as included on the plans submitted with the Pre-Consultation Application and future Formal Amendment Application on the Demonstration Plan contained within Figure 3.4.2.**
- Character Areas – Pages 30 and 31 of the Guidelines provide a brief overview of the desired objectives for each Character Area within the Precinct Plan. As it relates to the subject site, it is more appropriately within the Queen Transit Corridor to reflect its location both along the transit spine, as well as the gateway to the Precinct Plan area.

The following revisions are requested (see **Detail D** in **Appendix 2** of this letter):

- **Requested Modification: Revise the Character Area designation of the subject site from “Community Node” to “Queen Transit Corridor”, as well as modify the “Community Node” designation further south along Rutherford Road South on the Character Areas Plan contained within Figure 3.5.3.**
- Proposed Street Pattern – Figure 4.1.1 of the Guidelines provide a conceptual Proposed Street Pattern, including a ‘Proposed Public Streets 25.2 m’. The Proposed and Potential Streets identified in Figure 4.1.1 do not reflect the road type and configuration of the Starbank Master Plan, notably the connection from Queen Street East to Clark Boulevard.

The following revisions are requested (see **Detail E** in **Appendix 2** of this letter):

- **Requested Modification: Replace the reference to the north-south street that connects Queen Street East with Clark Boulevard from “Proposed Public Streets 25.2 m” to “Proposed Public Streets 23.0m” as well as the alignment of the street connecting Clark Boulevard with Queen Street East.**
- **Requested Modification: Replace the reference to the internal road network on the east side of the north-south road from “Proposed Public Streets 25.2m” to “Proposed Public Streets 18.0 m”**
- **Requested Modification: Replace the reference to “Potential Private Streets” on the west side of the north-south road to “Proposed Public Streets 18.0m”.**
- Potential Redevelopment Configuration – Section 4.2 of the Guidelines states that the development scenarios within the Guidelines “demonstrate the maximum built-out utilizing the densities and heights prescribed by the Secondary Plan”. This is inconsistent with the Information Report and Secondary Plan, which specifically have been advanced by City Staff to not include maximum heights and densities.



- **Requested Modification: Delete the following sentence from Section 4.2: “The scenarios demonstrate the maximum built-out utilizing the densities and heights prescribed by the Secondary Plan”.**
- *Proposed Building and Podium Heights* – Figure 4.4.2 of the Guidelines provide a conceptual Building and Podium Heights plan. Unlike the Density Distribution Plan in Figure 4.5.1 of the Guidelines, it is not clear on Figure 4.4.2 as to the extent of the area subject to any of the proposed height ranges. In addition, the Schedule does not provide heights for all parcels, including lands with approved applications, which is misleading.

The following revisions are requested (see **Detail F** in **Appendix 2** of this letter):

- **Requested Modification: Replace the building outlines and heights to reflect the Starbank proposed Master Plan.**
- **Requested Modification: Amend the location and orientation of the “Community Hub” and “Neighbourhood Park” consistent with proposed revisions on the Precinct Plan and other schedules within the Guidelines as requested through this submission.**
- *Proposed Density Distribution* – Figure 4.5.1 of the Guidelines provide a conceptual Density Distribution plan. In addition, the Schedule does not provide densities for all parcels, including lands with approved applications, which is misleading.

The following revisions are requested (see **Detail G** in **Appendix 2** of this letter):

- **Requested Modification: Replace the proposed density of the subject site from “7 FSI” to “8 FSI”, to reflect the Starbank proposed Master Plan.**
- **Requested Modification: Amend the location and orientation of the “Community Hub” and “Neighbourhood Park” consistent with proposed revisions on the Precinct Plan and other schedules within the Guidelines as requested through this submission.**
- *Proposed Open Space Framework* – Figure 5.1.2 of the Guidelines provide a proposed Open Space Framework plan.

The following revisions are requested (see **Detail H** in **Appendix 2** of this letter):

- **Requested Modification: Amend the location and orientation of the “Community Hub” and “Neighbourhood Park” consistent with proposed revisions on the Precinct Plan and other schedules within the Guidelines as requested through this submission.**



- Street Hierarchy and Typologies – Section 5.3 of the Guidelines identifies a series of illustrative cross-sections of potential streets within the Precinct Plan. It is understood that these cross-sections are conceptual and that the final cross-section applicable to development applications will be confirmed at the detailed design stage.

Closing Remarks

As summarized above, Starbank has concerns with the proposed OPA and associated Queen Street Transit Corridor Secondary Plan, Queen East Precinct Plan, and Queen East Precinct Plan Guidelines. We request that City Staff meet with Starbank and its core consulting team to discuss the concerns as outlined herein prior to City Staff bring forward a final Recommendation Report for City Council approval.

We reserve the right to provide additional comments to the City of Brampton in connection with this matter prior City Council's consideration of the final Recommendation Report.

By way of this correspondence, we also respectfully request to be notified in writing of all future formal/information public meetings and open houses, as well as the tabling of any future Information and/or Recommendation Report(s) to Planning and Development Committee and/or City Council in connection with this matter; including all Notices of Decision.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
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cc: Starbank Developments 285 Corp.
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