

From: Sylvia Menezes Roberts <>
Sent: 2022/05/30 2:06 PM
To: McNeill, Andrew <Andrew.McNeill@brampton.ca>
Subject: [EXTERNAL]Draft OP Review

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Hi Andrew,

Attached is my draft OP review, sorry it took so long.

Sincerely,

Sylvia

Preface, the headers in section 1 need to be text, not images, in compliance with AODA regulations.

1-2

Rapid Growth: change “to 1 million by 2051” to “to 1 million or more by 2051”, to include that the plan also considers that possibility.

Getting Around: Growth Plan section 3 specifies transit as the first priority, section listing the modes ought to clearly specify that. Setting aside the Growth Plan, on a practical level, to achieve the transformational redevelopment enabling a modal shift to pedestrians and cyclists, the City has to focus on transit first so that redevelopment makes sense without being auto oriented.

1-3

Celebrating Our Diversity: Brampton is not home to one of the largest South Asian communities in Canada, it is home to the largest one, period, and I believe internationally, it is second only to London UK for concentration of South Asians outside of South Asia,

Health Wellness and Safety: The diabetes statistic is for OVER 20, the paragraph references under 20 <https://www.peelregion.ca/strategicplan/20-year-outcomes/diabetes-prevalence.asp>

1-6 How do you measure the success of 15 minute neighbourhoods? Goals need metrics. Also, keep in mind how grocery stores work in urban areas, they require a significant amount of population, which means 15 minutes may not include grocery without major upzoning.

1-7

Brampton Tomorrow: It again mentions pedestrians, cyclists, and transit users in that order, this works for safety, but not mobility planning. In practice prioritizing transit users also benefits pedestrians, but prioritizing pedestrians does not mean that it necessarily benefits transit users.

2-4 Schedules 3A-3C, looks like the last “s” is not in bold

2.1.4 What does along Corridors mean? Does it mean parcels fronting onto it, or is this including walksheds.

Table 1: Is the City seriously suggesting household size is going to increase? Brampton’s current large household size is the result of a housing shortage fueling overcrowding

2.1.21 Intensification also needs to be supported within the walkshed of frequent transit, otherwise you won’t have the population to get the services you want for 15 minute neighbourhoods

2.1.27: 71 people and jobs per hectare for neighbourhoods seems low, how much land area are you planning to dedicate to single detached? Townhouses can easily exceed 71 people per hectare.

2-11 Yes, actually the City can grow in a ton of places at once, and if we are to address the housing crisis, not only can we, we must. The City is short tens of thousands of units because it tried to micromanage growth, hindering direly needed small units. Policies can be created to encourage the growth to frequent transit areas, and that can mean a relatively wide area is experiencing development. Toronto focusing development too intensely on certain areas has caused significant problems.

2-24 Provincial requirements dictate that transit must be #1 priority. Furthermore, if you want to make the city walkable, you have to push transit first to enable pedestrian friendly development patterns.

2.1.56(c) We need to not just imagine different mobility needs in 2051, but how to achieve getting from where we are, to where we want to be.

2.1.56(f) Improving snow clearing needs to be a priority, many seniors who get around on foot and by transit are shut in for weeks in the winter because of how awful the snow clearing is.

2.1.57 Reliable and efficient transit doesn't support the growth areas, they *enable* them to be real places that things happen in.

2.1.63 Zum needs to be a separate category of transit, between rapid transit and local transit routes

2.1.65(b) Zum is definitionally not BRT, from the Metrolinx 2041 RTP (italics mine)

Bus rapid transit (BRT): Transit infrastructure and service with buses *running in their own exclusive right-of-way, fully separated from traffic*, typically with signal priority measures in place and longer spacing between stops than conventional bus routes (typically 500 metres to 1 kilometre) to maintain higher average speeds and ensure reliability of the service. May include additional features to improve operational efficiency and enhance the customer experience, such as off-board fare collection, platform-level boarding, and real- time passenger information.

2.1.71 The City needs to plan for urban delivery such as parcels, mail, and grocery delivery, and consider how to accommodate this where the City is also planning on road cycling.

2.1.72 Should there be policies explicitly protecting industrial spur lines?

2.2.1(b) If your planning rules are good, they will naturally bring development towards good transit locations, needing less parking makes developments pencil out better, encouraging developers to prioritize those places. Good transit access also makes properties sell better, further encouraging development there.

2.2.1(f) the CEERP climate goals are inadequate, we need 100% reduction by 2050 or earlier, and due to significant population growth, it needs to be measured on a per capita basis

2.2.1(i) employment intensification is going to need significant improvements in the overall transit system, and unfortunately, Brampton Transit does not care about economic development

benefits, because it isn't their metrics. If you want this to work out, you have to spell out that transit *shall* be a core component of making Brampton a good place to do business, and this needs to be included in Brampton Transit's metrics.

2.2.2(a) There needs to either be specific language allowing the City to designate areas as Mixed-Use Districts that aren't in MTSA's, or have another similar category the City can designate. It makes zero sense for the area between Queen and the rail corridor to be designated as just regular neighbourhoods. The densities contemplated in the Neighbourhoods designation may not be sufficient to allow for environmental cleanup of the industrial areas.

2.2.3 I don't see those overlays on Schedule 5, do you mean Schedule 2?

Table 4 Designation references Schedule 3C, should be Schedule 3B. Low-Rise Plus should be allowed within 800 metres of the intersection of at least two of Higher Order Transit, Frequent Transit, or Support Corridor where properties front onto Collector Roads. Transportation relies on network effects, and the intersection of two of these lines is greater than twice as useful. It would be rather wasteful of transit resources to not do so. The constraints on where Low-Rise Plus is permitted directly conflict with goals on affordable housing, you must decide whether keeping buildings short or housing affordability are more desirable goals. Low-Rise Plus needs to be enabled across the board in Mixed-Use Districts.

Table 4 Overlays If you want 15 minute neighbourhoods, then the areas around Urban and Town Centres need to be looser within 15 minute walksheds of the central point, preferably 20 by the Urban Centres.

2-38 Town Centres should also be considered at Highway 10 & Bovaird, and Airport and Bovaird. At minimum Highway 10 & Bovaird should be added immediately. In the long term, Higher Order Transit will be necessary on Bovaird, and planning Town Centres at those nodes will help build up the ridership and intensification necessary to facilitate it. The City also needs to figure out what to do with Heart Lake Town Centre in the long term owing to its large size, and that it is at the intersection of two future Zum routes.

2.2.5(b) disallow new gas bars (gasoline & diesel) outside of employment areas.

2-39 24/7 transit service is necessary to make Downtown Brampton a cultural, entertainment, and tourism hub. Poor evening and weekend transit service is hobbling the ability of those sectors to develop in Brampton, as they rely upon young people with discretionary income, young people with cars generally lack discretionary income, and young people who rely upon transit lack the means to get their cost effectively (it is cheaper to take GO into Toronto than take an Uber/Lyft both ways within Brampton).

2.2.7(c) Should be amended to permit surface parking lots, but only with a phasing plan getting rid of them. Surface parking lots can be a cost effective way to provide parking now cheaply, and get rid of it in the future. Brampton will take time to urbanize.

2.2.10 View corridors of what?

2-46 Main Street between Downtown and Williams Parkway seems more suitably designated as a Primary Urban Boulevard than a Secondary one. What about the Bram West Parkway?

2.2.30 Some of the transition between the Boulevards and Neighbourhoods should happen in the Neighbourhoods, for example the transition between the Kennedy Road Boulevard and Peel Village can happen between the Boulevard and Bartley Bull. The angular plane Toronto requires has major negative impacts on the cost of housing and environmental performance.

2.2.34 What about Accessible Parking?

2-53 Zum is not rapid transit. "And Steeles?" seems like a sentence fragment left over from a draft, but yes, we absolutely need to be planning rapid transit along Steeles, the 511 will in within 5 years connect 2 GO Stations on two different GO lines, one of which will have frequent all day train service, two Post Secondary Institutions with over 10k students each, and two LRTs.

2.2.39(b) Frequent transit can and should be provisioned across the city, and development not just limited to Centres, Boulevards, and Corridors should have regard for this.

2.2.40(c) wording is ambiguous on how it will affect a parallel street, if a lot has dual frontage.

2.2.48 Rephrase to "Reduced or eliminated" to clarify that the parking requirements being reduced to zero are explicitly considered as part of the OP?

2-58 Zum is not BRT

2.2.59 This says that new Primary MTSAs may only be added via MCR by the Region of Peel, does this mean the City of Brampton may add Planned MTSAs to the OP personally, instead of implementing it on behalf of the Region of the Peel? If this is intended, that is good, there are several locations where the City marking and beginning to plan for MTSAs is good, such as along the Primary Urban Boulevard for Steeles. Additional points at the Heart Lake Town Centre (Kennedy & Sandalwood), Highway 10 & Bovaird, and Main & Vodden also make sense.

2-69 I have no idea why it is labeled as 1.3.181.

c) 26 Sterne Ave. and 33 Erlesmere Ave are fine actually, even though they clearly have notable differences in height, massing, etc., that is what is needed if we want to address our housing crisis.

f) A bunch of this is bad, for example, many areas have the building set back a significant distance from the road in order to allow a lot of cars to be parked, that is bad and buildings should be allowed to be brought much closer to the street.

2.2.89 If affordability is actually a priority, you are going to need to accept that a redeveloped building having 2-3x the floor space of nearby buildings is fine.

2.2.93(e) specify that this may include zero additional off street motor vehicle parking, in infill tower development in areas with good transit, there may not be a need to include any additional parking spaces.

2.2.104(b) compatibility of religious buildings with the surrounding neighbourhood is a problematic concept, because traditionally, outside of a CBD, places of worship are the largest things in the neighbourhood. Furthermore, there should also be specific provision for something such as a tower to be significantly taller, as this is a feature of traditional religious architecture in North America. You should be able to build something like St. Paul's United Church (across from City Hall) under the new rules, otherwise, we are creating a de facto discriminatory system where faiths and denominations which are more typical among newcomers are disadvantaged compared to those that have been present for a long time, and have existing houses of worship.

2.2.144(a) Industrial uses would significantly benefit from improved transit service in the evenings, facilitating afternoon and night shifts, however economic development benefits are assessed as worthless by Brampton Transit.

2.2.146 Do you mean Schedule 6?

2-104 "the" Humber River

2.3.27 Reminder, steps up into the building make it hard to be wheelchair accessible, and as such, to require things like front porches to match neighbouring buildings hinders accessibility.

2.3.61 Block plan, do you mean Precinct Plan?

2.3.98 District Energy is not useful for GHG reduction in Brampton because CHP is de facto incompatible with net zero (the accounting on biomass is concerning), and we lack access to large bodies of water like the Great Lakes to use for cooling (like in Toronto), as such mandating district energy systems is fundamentally counterproductive. District Energy also does not work well for linear development like on Boulevards.

2.3.100 in 2.3.98 you mandate district energy, and here you say "may identify potential district energy areas", these seem in conflict.

2.3.117 The City needs to change the heating by-law to be a heating and cooling by-law, because climate change is going to greatly expand when we will have cooling needs, both in amount needed, and time period needed, for example, we might see a need for cooling in May.

2-195 Literally all three of your headline targets are severely flawed, either because the target is flawed or outside of your control. How we got the 30% number is that in the 19th century the rule of thumb was a week's wages for a month's rent, which then got adopted by the US

government in 1969 for the Housing and Urban Development Act, and later got moved up to 30% in the 1980's, there is not actually empirical evidence behind it.

Table 7 is false precision, it is no better than numbers you pulled out of your hat, but presented as detailed numbers. Meeting the targets for Affordable Ownership would require transferring a staggering amount of public money, literally hundreds of millions of dollars per year, into private hands. The construction costs, both in hard costs, and soft costs, are so high it isn't possible to build new housing that is affordable at those costs.

Table 8 is about rental tenure which is largely outside of City control. Expect to see a burst of rentals from additional residential units for the next couple years, but we don't know how many are actually new units, and that will dry up soon, as we are starting to run out of basements to put apartments in most houses.

2.3.226 There is no particular reason the housing for Affordable Housing needs to be new, new housing is almost always more expensive, due to construction costs, unless there are major subsidies involved. The 50% of new housing units provided through forms other than detached and semi-detached units is low, this should be more like 50% of greenfield units being other than detached and semis. Singles and semis are simply unaffordable due to the very high serviced land costs and construction costs, townhouses are still quite expensive to build due to the high construction costs, but are closer to affordable. Brampton's population growth is also from a fundamentally different demographic, it is mostly coming from young people, who will need a ton of SRO and lodging house beds which don't really count under new units even if they are new housing. Tenure is mostly out of the hands of the City as tax policy has the largest influence on it, next is federal money like loan programs, and a much smaller portion is social housing funding.

2.3.228 Where is the evidence that microtargeting housing is productive?

2.3.231 Large scale upzoning is necessary to increase the availability of land for development without increasing land costs.

2.3.232(b) Good

2.3.233 At current house prices, the City needs to have fairly generous envelopes allowed to enable buildings to be redeveloped and have the new units be affordable

2.3.240 This would work if Brampton was experiencing population decline, but the population is growing rapidly, so adaptive reuse is a hindrance, we need to increase the housing stock.

2.3.241 Force greenfield to shift towards predominantly townhouses for single family housing, it will reduce the land cost per unit. helping bring down costs.

2.3.243 Currently this year the average resale price of a condo townhouse exceeds the ability of Decile 9's affordable housing budget, cease rezoning for new single and semi construction except where site geography makes towns and apartments impractical.

2.3.244 Exempt townhouses from the ADU requirements, and permit ADU doors to exit out the front.

2.3.245 Good

2.3.249 Rent to own has a sordid history in the US. Community Land Trusts and Co-ops require major subsidies, and shared equity means that the programs are financially hurt if housing becomes more affordable.

2.3.257(d) In order for this to work, it requires developers to charge even more for housing in order to fund the gratuitous conveyance of land, you are literally going to require housing to become less affordable to build affordable housing?

2.3.257(e)(i) Who is going to buy the purpose built rental buildings? Someone has to provide financing for those to get built.

2.3.258 These requirements make housing less affordable, because someone else has to foot the cost.

2.3.263 Brampton has low land prices for commercial land to be redeveloped for housing, basically all of the cost difference of IZ units is being paid for by the market rate units. Furthermore, Brampton's floor plate rules for high rise make it difficult to make units larger than one bedroom, if you want more of the larger units, you need to allow for chunkier floor plates.

2.3.269 Spending CBC on improving transit is actually far more effective at improving housing affordability for residents, as the savings on transportation costs make it much easier to pay for housing

2.3.270 Schedule 3B, not 3A. There should be zero resident parking requirements within 400 metres of Support Corridor Transit routes, 800 metres of the intersection of two of the transit route categories, or within 800 metres of the Rapid Transit Network, and this goes for all unit types. ½ mile/800 metres from two frequent bus routes being exempt from minimum parking requirements is increasingly standard. Minimum parking requirements do enormous harm to housing affordability; minimum parking delenda est.

2.3.274 Delays in planning add significant cost to market housing.

2.3.275 Attacking short term rentals in Brampton is extremely unwise, first, it isn't much of an issue compared to core cities like the City of Toronto, and second, a significant portion of the

short term rentals are actually utilized by newcomers as medium term rentals, who would be adversely affected.

2.3.282-284 Good

2.3.285 Reminder, SROs compete against rentals of bedrooms, if they are of a comparable price, they are an improvement in quality of housing stock, especially if they are on good transit.

2.3.287 ARUs should not have minimum parking requirements.

2.3.293 Streamlining is good

2.3.294 It mentions Schedule 3A regarding transit, schedule doc shows this as 3B. It isn't that the development there improves transit, it is that the transit access improves affordability because it saves people a ton on transportation costs.

2.3.295 Will explore, and furthermore will consider partnering with other municipalities to support a broader array of models to lower costs. If you want larger units, this is a necessary policy.

2.3.298 Also 3A 3B issue regarding transit

2.3.300 No, don't require a certain portion to be affordable units, the first priority needs to be building enough housing that we no longer see dire overcrowding. The high costs are a result of extremely high demand and low supply.

2.3.305 Brampton has a dire need for apartments of all sizes, especially for single people, the priority should be on delivering more units, not of unit sizes, a focus on unit sizes is going to cause harm to the city. With high rise construction costs, a new 3 bedroom apartment unit that is properly family sized is going to be similar in cost to a condo townhouse, perhaps even more. Brampton's floor plate rules for tall buildings directly conflict with the desire to build more larger units.

2-218 Don't engage in euphemisms such as "diverse users", call us what we are, disabled.

2.3.316 It is not cost effective to put elevators in apartment buildings with low unit counts; if you want the buildings to be accessible, they need to have larger unit counts, or only the ground floor can be made accessible.

2.3.320(a) you don't need to study this because basic math says this is an incredibly bad idea. The savings for the public are far greater by expanding transit service than cutting fares, because car ownership is several times more expensive than taking transit. For people who can't afford transit, it is worth looking at increasing the number of subsidized passes available from the Region.

2.3.321 Increasing overall transit service hours does not cause displacement, while providing significant benefits to low income people.

2.3.324-2.3.329 These don't actually help with food security.

2-222 25% transit mode share is weak, large swathes of Scarborough are over 30%, even north of the 401, target 30% for transit.

2.3.345 Prioritize transit, through transit you get the intensification to enable a higher AT mode share.

2.3.352 This also needs to consider railway spurs.

2.3.369(c) While bicycles take up much less space than cars, they are still sufficiently large that even securing 5% of bicycles at major rapid transit stops will take up far too much space.

2-236 Complement, not compliment

2.3.371 The City has to date failed when it comes to efficient and seamless connections between transit and the improved GO service under the current government, because improving connections is not a core metric, only farebox recovery and area coverage of the City are.

2.3.373 Bramalea GO represents one of the best places in the City of Brampton to build major office, especially given the planned frequency of GO train service, to have it be mostly residential would be tremendously injurious to the City's plans of increasing employment activity rate.

2.3.377 The City ought to have a goal related to increasing the number and share of people getting to the GO station by means other than driving.

2.3.379 The City ought to protect and plan for rapid transit along Mayfield Road and Airport Road in the long term. Mayfield Road will be needed to transport the significant number of people moving to Caledon by 2051, and Airport Road to better link Brampton with the Airport and the major transit hub that will be at Pearson. We could also justify BRT along Highway 10 into Caledon.

2.3.281 I am surprised the OP talks about frequent transit on Derry Road when it isn't in Brampton, at all. The City has short term plans to build Zum lines along Chinguacousy and Bramalea Road (within 5 years) and has longer term plans to build Zum lines along Kennedy and Sandalwood.

2-238 Schedule 3B, not 3A

2.3.386 Change this from “will” to “will endeavour to”, while I agree with the goal, there are a number of places where this may not be feasible, necessitating the removal of useful transit stops.

2.3.387 Complement, not compliment

2.3.388-389 GTAA needs 24/7 service from Brampton, they literally mentioned this publicly to the City in February 2020, they have a ton of workers start at 3 am to get ready for the early morning flights, and currently they can't take transit.

2.3.392(d) transit pass incentives are a problem, because most residents don't work in Brampton, we need something like a Peel Transit Pass which works for both MiWay and Brampton Transit, in order for a transit pass program to work well.

2.3.395 The City should also target GO stations, most of them have parking problems, and people frustrated with how early they need to drive there to get a spot might be interested in transit, freeing up spaces for other people.

2-241 The Planning department moves too slowly, and can't actually get the data to be able to right size parking requirements. If you have minimum car parking requirements, by the nature of the planning department, it will lead to overprovision of parking, unless they are so low as to be irrelevant, in which case why have them?

2.3.397 Reminder, structured parking is exorbitantly expensive, and for a new development, interim parking to be removed at a later date may be the most cost effective way to development, and lead to less parking in the long term.

2.3.401 Buffalo NY found that removing minimum parking requirements organically led to shared parking provision reducing the overall number of parking garages and curb cuts.

2.3.404 The City needs to explicitly commit to increasing transit service hours in order to increase ridership, to transition people away from cars.

2-249 If you want 1.6 hectares per 1k people, you need to acquire the Brampton Golf Club on Kennedy Road to ensure Uptown will have adequate parkland

2.3.419 Incorporating a way to block urbanization of the Brampton Golf Club will reduce the land value, making it easier to acquire, even in the US with constitutional property rights that isn't considered a taking.

2-256 You should probably have a map of all the parkland and public greenspace, including the valleyland with it displayed together

2-266 Brampton needs a Catholic cemetery, since the City wants to develop where the Archdiocese of Toronto had acquired land for one, where is it going to be?

2-267 I don't see a number of golf courses shown on Schedule 10

2.3.463 The City needs to prepare for opening facilities such as splash pads earlier in the year as weather dictates, to ensure people can stay cool.

2.3.464 We need the heating by-law to be temperature dependent and also include a cooling bylaw component. We also need to do retrofitting of older private buildings with heat pumps to ensure residents can stay cool in the summer.

2.3.465 What steps are you taking to help get medical office space built?

2.3.466 If you want that to happen, we need to significantly increase service hours for transit. Transit allows people to get to work without needing a car, allowing them to reduce or eliminate the number of cars they own. When they eliminate cars from the household, they tend to specifically patronize businesses they can walk or take transit to because it is convenient.

2.3.486 separation from OBRY should still be planned as if it were an active railway, in order to enable it to be reactivated in the future.

2.3.495 How often is it going to be updated, once? Regularly? Set a time frame, such as updating it every five years.

2.3.498 support the expansion how? As detailed in the Economic Development Master Plan? Any measurement metrics?

2.3.499 Does this include collaboration with Post Secondary Educational institutions?

2.3.500 If it is the focus, what does this mean for the Sheridan campus? Do you plan to decline to invest in the Sheridan campus in order to ensure innovation happens Downtown? Manufacturing innovation might be better suited to office/industrial space in an industrial area

2.3.506 The Queen Street Corridor close to Highway 410 is the optimal location

2.3.521 The biggest thing you can do for improving Brampton's culinary scene is improving transit on evenings and weekends, and nuku minimum parking requires. We also need to fix the sign by-law in order to make loading zones for delivery vastly easier to do.

2.3.585 Precinct Plans, not Block Plans

3.1.3(b) What are the implications of priority levels?

3.1.17 Does transportation improvement phasing include Brampton Transit service hours and building Zum lines? Brampton Transit has had serious issues with inadequate transit service hours for the growth being added. In order to meet transit targets, Brampton Transit is going to be need to given blocks of hours to increase ridership in the existing population, and additional service hours to meet needs for population growth. The costs of increased population are not equal, the farebox recovery is extremely high on routes like the 501 Queen, while routes servicing greenfield expansion often have much higher costs due to low farebox recovery until the area fills out.

3.1.18 What specific steps is the City of Brampton going to take in the Brampton Plan to ensure sufficient medical office space is built to accommodate family practice needs?

3.1.19 Ironically, the Draft Official Plan doesn't comply with accessibility requirements that we were required to follow in 2014, you have a lot of headers that are words, that are images, not text, that a screen reader might be unable to process.

3.1.40 Map 13, do you mean Schedule 13?

3.1.43 Schedule 13

3.1.44 Schedule 13

3.1.53 Schedule 2

3.1.66 Schedule 5

3.1.76 Schedule 2

3.1.77 10 is way too low a cap, this would kill a lot of Missing Middle projects like small apartment buildings, unless explicitly required to set this threshold by the Region, it should be more like 50 or 100.

3.1.85 I am concerned this could be an onerous requirement hurting Missing Middle Housing if you don't design the new zoning very loosely.

3.1.93 If the impact on the transit network is larger than can be paid for with the transit DCs, the CBC revenue should go to transit.

3.1.105 The City also needs to ensure certain items such as the parking by-law are regularly updated.

3.1.127 Having talked to people who build Missing Middle housing, 5 is rather low, and plenty of Missing Middle housing projects could be killed for that, 10 would make it easier to actually deliver affordable housing

3.1.133 If possible this should include special consideration in order to make buildings more accessible

3.1.152 If you want to make housing more affordable, the easiest way to do it is more transit, including Zum and buying regular buses, in addition to funding Rapid Transit.