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SENT VIA EMAIL

P – 3171  
P - 3003

May 30, 2022

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

**Attention: Peter Fay**  
**City Clerk**

**Re: City of Brampton Draft Official Plan Statutory Public Meeting**  
**Four X Development Inc., Mustque Development Inc., Pencil Top Development**  
**Inc., Metrus Central South, Metrus Construction and Tesch Development Inc.**  
**c/o DG Group**  
**City of Brampton**  
**Region of Peel**

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Dear Mr. Fay,

KLM Planning Partners Inc. acts on behalf of Four X Development Inc., Mustque Development Inc., Pencil Top Development Inc., Metrus Central South, Metrus Construction and Tesch Development Inc. c/o DG Group in relation to their lands located on the east side of Mississauga Road, both north and south of Steeles Avenue West within the Bram West 40-1 Secondary Plan area and on the west side of Mississauga Road both north and south of the future Williams Parkway extension within the Heritage Heights 52-1 Secondary Plan area.

We have had an opportunity to review the April 2022 draft Official Plan and offer the following comments and concerns:

The first general comment relates to the sheer size of the Official Plan. The document has a significant amount of superfluous information that is quite frankly difficult to read and understand. This document does not need to be this size and should be reduced immeasurably. If the City's objective is to provide an Official Plan that is easy to read and navigate for everyone, this version has completely missed the mark.

Section 2.1.27 – sets out a minimum greenfield density target of 71 persons and jobs per hectare whereas the minimum in Places to Grow is 50. Why is there a significant increase in the minimum density?

Section 2.2.3 – references overlays shown on Schedule 5, yet Schedule 5 does not include any overlays. Furthermore, much of the policies relate to overlays and yet the schedule does not refer to overlays at all. Perhaps the schedule should be amended to reflect the intent of the policies.

Section 2.2.62.a – this policy is also reflected in many other policies however we are unclear how exactly a 15-minute community will work. As an example, in many instances in large communities a school is used as a focal point within that community. In some cases, the school board after ten years decides not to pick up the option on the school block and it becomes developed for other purposes, typically residential uses. In this example, the intent of the 15-minute community was created and yet ultimately the end result is typically out of the developer's hands if these public uses ultimately are constructed. In addition, it would be unfair for the City to require the developer to construct the school block for something other than residential uses if the school board decides not to purchase the school block. This is just one example of how, in some cases the 15-minute community will be difficult to achieve.

Section 2.2.115 – “the” before “intended” should be removed. In addition, what is a “copy shop”?

Section 2.2.122 – Mixed Use Employment areas do not include residential uses as a permitted use, yet the designation along the east side of Mississauga Road has mixed use development (commercial on the ground floor with residential above) along with residential uses. This should be included as a permitted use.

Section 2.2.127 – how is a 50-50 employment to population ratio even possible? This seems like an unrealistic target and should be revised to a 60-40 population to employment ratio. Given the higher density residential uses around MTSA's, the minimum persons and jobs per hectare target in the growth plan can be achieved.

Section 2.2.141 – This policy is very prescriptive and should encourage green development initiatives instead of prescribing it.

Section 2.2.146.d – This policy should also recognize the removal of features, if appropriate reports identify it is possible, without an amendment to the plan.

2.2.148.d. – This should specify the compensation component. As an example, a simple hedgerow should not be subject to compensation.

Section 2.2.152.c – No net loss is not a reasonable test, especially in the context of dealing with simple hedgerows which are not typically preserved.

Section 2.2.153 – same comment as above.

Section 2.2.163 – Low Impact Development SWM techniques should be included as a permitted use.

Section 2.2.163.d) – As noted above, how is no net loss is not a reasonable test to include in the Official Plan.

Section 2.2.164.b) – As noted above, no net loss along with a net ecological gain are not reasonable tests.

Section 2.2.174 – what is a wetland management plan?

Section 2.2.179 – How was 30 metres decided as the maximum separation distance to have two separate woodlands classified as one?

Section 2.2.272 – continues to use net ecological gain as a test, which is not consistent with Provincial Policy.

Section 2.2.276 – what is Adaptive Environmental Monitoring (AEM)? Why is this being required now?

Section 2.3.30 – designing mid-rise buildings to attain near net-zero greenhouse gas emissions is not reasonable. This policy should encourage the design of net zero instead of prescribing it.

Section 2.3.69 – A no net loss to community services and facilities is not reasonable given many of these uses are not within a landowner's ability to deliver such a use.

Section 2.3.72 – We are unclear how a "special school levy" would be applicable.

Section – 2.3.105 – Is the City intending on applying standards to home construction that are greater than the building code?

Section 2.3.167 – What exactly is an "adaption checklist" and why are these required as part of a development application?

Section 2.3.178 – We are supportive of LID's however they should be permitted within future City owned infrastructure without penalty to the developer. As an example, LID's in a park should be permitted without a deduction in parkland credit.

Section 2.3.181 – What is the definition of "large scale development" and how will this be applied?

Tables 7 & 8 – We are concerned with the affordable housing percentages the City is seeking to achieve at a total of 30%, split evenly between moderate and low incomes.

Section 2.3.226 – Requiring 30% of all new housing units to be affordable is not achievable or realistic. In our opinion, this metric should be no higher than 10%. Nor is requiring 50% of all units being in other forms than single and semi-detached dwellings and requiring 25% of all new housing units to be rental. These figures are not obtainable. In our opinion the City should not be mandating housing typology or tenure in an Official Plan and these elements should be removed.

Section 2.3.253 – The City has always required an open house to occur on the same evening and before the public meeting begins. The introduction of a further non statutory neighbourhood meeting is not necessary. The current process works well and should be maintained.

Section 2.3.257 – A Planning Justification Report is always asked by City staff as part of a complete application and now to add a House Assessment Report is unnecessary. Some of the items mentioned in this section are typically covered in a PJR. Therefore, this policy is not required and should be removed.

Section 2.3.258 – This policy is not reasonable. To suggest that developers gratuitously convey land with appropriate zoning to the Region of Peel or a non-profit housing provider is not reasonable. This policy should be removed.

Section 2.3.260 – 2.3.263 – The draft OP already sets out affordable housing targets (which we do not agree with, as noted above), why is this section even necessary? In our opinion, this section should be removed.

Section 2.3.265 – how does the City intend to ensure 30 years of affordable housing? This is unreasonable.

Section 2.3.275 – How can residential vacancy rates be controlled through the development process. Again, a policy that is not realistic and should be removed.

Section 2.3.305 – Once again, how is this appropriate that an Official Plan sets out minimum requirements in the built form, in this instance as it relates to percentage of bedrooms per dwelling unit. This is not reasonable and should be removed.

Section 2.3.419 – Low impact development techniques should be permitted within parks, without penalizing the developer for parkland credit.

Section 2.3.421 – Permitting LID's in parks is important however developers should continue to receive full credit for the park with or without LID's.

Section 2.3.427 – This policy is counter to the above noted policies that seek to have LID's within parks.

Section 2.3.428 – Will private amenity spaces be provided with parkland credit? If not, the private amenity space should only be available to the residents that pay to maintain it.

Section 2.3.429 – What does the value of an offsite park have to do with whether the park location is suitable or not? This should be removed as it is irrelevant.

Section 3.1.11 – What is a phasing agreement and why is it assumed they may be necessary? This policy should be removed.

Section 3.1.94 – We continue to be of the opinion, the proposed affordable housing targets that has been included in Brampton Plan are not reasonable and should be revised to a target of 10% of the units, City wide, on a yearly basis. The proposed standards are far too onerous and are not reasonable.

## **Mapping Concerns**

**Schedule 1:** identifies the extension of Williams Parkway west of Mississauga Road. Given this road pattern is under appeal via the Heritage Heights Secondar Plan, we believe this should not be shown on this and all of the following schedules.

**Schedule 4:** identifies the lands east of Mississauga Road, both north and south of Steeles Avenue West as being designated as Provincially Significant Employment Zones (PSEZ). This designation did not appear on any previous drafts and in fact the closest PSEZ was to the limit of the south west corner of Mississauga Road and Steeles so why are lands included in this designation? In our opinion, this should reflect the way it was previously wherein they were not within a PSEZ and furthermore, should reflect the limits of the PSEZ as noted in the Provincial mapping.

In addition, the Built-Up Area and Greenfield Area shown on Schedule 4 does not seem to correspond to what is physically built on the ground. This particularly applies to the north east corner of Mississauga Road and Steeles Avenue West.

**Schedule 5:** there is a small parcel on the east side of Mississauga Road, north of Olivia Marie, immediately abutting the MTSA boundary that is designated "employment" whereas the lands immediately north are designated as "Mixed Use Employment". The small portion should also contain the "Mixed Use Employment" designation in order to be consistent with the existing mixed use and residential buildings that are built and occupied there today.

**Schedule 8:** identifies the proposed street patterns within Heritage Heights. Given this is under appeal, the street pattern should not be identified on this schedule. In addition, the schedule only identifies a minimum ROW width of 20 metres and yet, much of the residential communities within Brampton have been built using the 18 metre ROW. This should continue in order to

maximize the amount of land available for development purposes. In addition, the corridor protection area should only apply to the location of the GTA West Corridor.

**Schedule 9:** We are not aware of any Class B Heritage Resources located within Countryside Villages between Bramalea Road and Airport Road. The schedule identifies three locations and we do not believe this is correct. Furthermore, there is a Class B Heritage Resource identified on the west side of Mississauga Road within the Heritage Heights Secondary Plan area which is also under appeal and should not be reflected on this schedule. Lastly, a Class A Heritage Resource is identified on the east side of Heart Lake Road, south of Countryside Drive. This property is approved for development and it is only the frontage along Heart Lake Road that is a cultural heritage feature. This should be revised as it currently identifies the entire property, which is not correct.

**Schedule 14:** As noted earlier, the Corridor Protection Area should only apply to the area in which the GTA West Corridor is scheduled to apply.

We look forward to receiving a copy of the next draft which addresses the comments and concerns we have expressed in a track change format along with a comment matrix identifying how each comment has been addressed. In addition, we feel for a document of this size, that is unreasonable to have a public meeting on May 31<sup>st</sup>, 2022 and then seek to have Council adopt a revised Official Plan within a months' time afterwards. There should be more time afforded to people that have taken the time to read this extensive and overly lengthy document to review and comment on the changes that have been made as a result of public input.

Lastly, we wish to be notified of any Council or Committee decisions made as it relates to the Official Plan.

Yours truly,

**KLM PLANNING PARTNERS INC.**



Keith MacKinnon BA, MCIP, RPP  
Partner

- cc. Juli Laudadio – DG Group
- cc. Trevor Hall – DG Group
- cc. Darren Steedman – DG Group
- cc. Rob Howe – Goodmans LLP
- cc. Andrew MacNeil – City of Brampton