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GWD File PN 18.2520.00  
'New' BOP 2022

The Corporation of the City of Brampton  
2 Wellington Street West  
Brampton, Ontario  
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**Attention:** Mayor and Members of Council  
Peter Fay, City Clerk  
Jason Schmidt-Shoukri, Commissioner, Planning, Building and  
Economic Development

**Subject:** Public Input  
Brampton Block Plan 40-5 Landowners Group  
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to the Brampton Block Plan 40-5 Landowners Group. The Brampton Block Plan 40-5 Landowners Group owns approximately 21 hectares (52 acres) within Block Plan Area 40-5 of the Bram West Secondary Plan (Area 40).

**Draft Brampton Plan (Official Plan)**

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

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

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

On behalf of the Brampton Block Plan 40-5 Landowners Group, we offer the following comments, observations and recommendations dealing with the Draft 'new' Official Plan:

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1. **Section 2.1.6** and **Table 4** note that Neighbourhoods will be planned at a lower density than Centres, Boulevards, and Corridors, while providing a full range and mix of housing options. It is recommended that the policy be revised to provide flexibility for greater building heights in strategic locations where appropriate, such as along Corridors, Minor/Major Arterials, key intersection locations, etc.
2. **Section 2.1.16** speaks to providing for 'minimum' growth forecasts on **Table 1**, as noted in the ROP. It is noted that the ROP does not use the word 'minimum', but rather 'target'. We recommend that the word 'minimum' be replaced with 'target' so that the reference to forecasts is consistent with the ROP.
3. General Comment – On Page 2-20, under the heading 'Secondary Plans', we note that the introductory paragraph is identical to the paragraph in the 'blue box' printed immediately to the right thereof. Is there any significance to the 'blue box' versus the regular text?
4. **Section 2.1.44** speaks to the preparation of Secondary Plans, and more specifically identifies the order of priority for areas where 'new' or 'updated' Secondary Plans are contemplated. Planning Staff have initiated the review of the Bram West Secondary Plan, and more specifically, Block Plan Area 40-5. The City of Brampton recently retained a consultant to undertake the review. Given that the update to the Secondary Plan is referenced in subsection f), we request clarification from City Staff that the policy in **Section 2.1.44** will not have the effect of delaying the Block Plan Area 40-5 review which has just been initiated. The policy as currently proposed does not include any provisions or exceptions for areas that are already being studied.
5. The wording of the policy in **Section 2.1.49** does not clearly indicate how the limits of a Precinct Plan are to be determined in specific instances; including, where the Secondary Plan does not include/identify the location of Precincts. The policy directs that Precinct Plans will be required with the submission of, among others, a 'significant' Zoning By-Law Amendment, but does not specify what the threshold is for determining if a Zoning By-Law Amendment is 'significant'. It is recommended that the policy be revised to include criteria as to what the threshold of 'significant' is; the goal is to ensure that the policy is objective as opposed to subjective.
6. It appears that the policy at the bottom of Page 2-33 and **Section 2.2.64** are not complete policies. It seems that both are missing the list of designations/overlays and criteria for development in 'new' Neighborhoods. Both policies need to be corrected and reissued to the public for review and comment before they can be advanced to Council for approval.
7. It is noted in **Section 2.2.2 b)** that the intensity of development and range of uses that may be permitted in Neighbourhoods varies depending on the street typology that a property fronts onto. This policy is a good example of a policy with flexibility for taller building typologies and increased density in appropriate locations within a Neighbourhood.





8. **Section 2.2.146** speaks to the determination of the precise boundaries of the Natural Heritage System on a site-specific basis in consultation with the Conservation Authorities. Refinements to the Natural Heritage System (NHS) should not require an Official Plan Amendment (OPA) if refined through a Subwatershed Study, an area-specific Environmental Impact Study/Assessment, or other forms of site/area-specific analysis. The policy should be amended accordingly.
9. **Section 2.2.249** requires an additional 5 metres of buffer for trails located adjacent to or within an ecological buffer. This policy is prescriptive and rigid. It does not allow for the opportunity to explore recreational trails that may not require an additional 5 metres of buffer or where part of the trail could be within the ecological buffer. We recommend that the policy be revised to note that recreational trails proposed within an ecological buffer will 'generally' require an additional 5 metres of buffer, subject to a site/area-specific analysis.
10. **Section 2.3.167** speaks to requiring an 'Adaptation Checklist' for all planning and development activities to address expected regional climate impacts. The policy does not identify what the 'Adaptation Checklist' consists of or the criteria meant to satisfy/complete it. The 'Adaptation Checklist' is not a defined term in the Draft 'new' Official Plan. As currently conceived, the policy in **Section 2.3.167** is vague and its spirit and intent is not clearly understood.
11. **Housing and Social Matters Chapter** (Page 2-195), **Section 2.3.226** and **2.3.244** reference the implementation of annual minimum 'new' housing unit targets. In particular, it notes that 25% of all 'new' housing units are to be rental in tenure. It is not clear whether the implications of this from a market demand and cost perspective was considered. In addition, it can be interpreted that from an implementation perspective, 25% of every Secondary Plan Area, Precinct Plan Area or individual Draft Plan is required to provide rental units. In regards to rental units, we note for the record that many condominium units are purchased as investments which are rented out; thereby adding to the inventory of available rental units. The very prescriptive policies as currently drafted may result in unintended consequences or reactions within the housing market. We recommend that the policy be revised to use more progressive language, such as 'encourage' and 'strive to provide'.
12. Similarly, **Housing and Social Matters Chapter** (Page 2-195), **Section 2.3.226** and **2.3.244** contain minimum housing targets in terms of affordability and density. With regard to density, it is not clear if the requirement that 50% of all affordable housing is to be provided for/available to low-income residents. Toward this end, are these units considered to be a component of the requirement that 30% of all 'new' housing units are to be affordable housing? We question whether the stated targets are achievable and practical? If the targets are too high, it can create a false expectation associated with addressing the problem of insufficient affordable housing. This may create other unintended problems.





With regard to density, the policies indicate that 50% of all 'new' housing units are to be in forms other than single-detached and semi-detached. These targets seem high. The targets do not appear to take into account market demand which plays a significant role in dictating unit types and densities. The prescriptive nature of the policy, combined with the targets, make this policy far too ambitious. Care and caution should be exercised so as to avoid unintended consequences within the housing market. We recommend that these targets be reconsidered to better reflect the reality of the market place and realities associated with implementation. Without financial support, affordable housing development initiatives, and investment by all levels of government these targets (if maintained) are not achievable.

13. **Schedules 8 and 14** inaccurately identify the Corridor Protection Area as depicted in Interim Control By-Law 306-2003 (through By-Law 290-2021). We respectfully request that the Schedules be revised to reflect the limits of the Corridor Protection Area as depicted in By-Law 290-2021.

### **Closing Remarks**

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

Kindly accept this letter as our formal request to be notified of all future Open Houses, Public Meetings, Planning Committee and Council meetings to be held in connection with the Draft Brampton Plan (Official Plan). Lastly, we request notification of the passage of any and all By-laws and/or Notices in connection with the Draft Brampton Plan (Official Plan).

Should you have any questions, please contact the undersigned.

Yours truly,

A blue ink signature of Andrew Walker, consisting of stylized, overlapping loops and strokes.

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

A blue ink signature of Michael Gagnon, featuring a large, circular, looping stroke that encircles the text below.

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

cc: **Adrian Smith, Region of Peel**  
**Andrew McNeill, City of Brampton**  
**Brampton Block Plan 40-5 Landowners Group**  
**Marc De Nardis, Gagnon Walker Domes Ltd.**  
**Richard Domes, Gagnon Walker Domes Ltd.**