



June 3, 2022

Via Email

City of Brampton
Office of the City Clerk
Attention: Peter Fay, City Clerk
2 Wellington Street West
Brampton, Ontario
L6Y 4R2

Dear Mr. Fay:

**Re: Submission on the City's New Official Plan
Northwest Brampton Landowners Group Inc., Heritage Heights
Landowners Group and individual landowners (hereinafter "NWBLG et al")**

We are planning consultants to the Northwest Brampton Landowners Group Inc. ("NWBLG") and the Heritage Heights Landowners Group ("HHLOG"), which is a part of the NWBLG. NWBLG was originally incorporated to represent landowners in both Mount Pleasant and Heritage Heights. While the concerns set out herein relate to the HHLOG, for the purposes of this submission, the incorporated group remains NWBLG. The individual landowners who are currently participating in the NWBLG is identified by parcel on the attached map.

- Bruce and Shirley Reed (Parcel 180)
- Bramwest Development Corp. (Parcel 170)
- James Reed (Parcel 113)
- Maplequest Ventures Inc. (Parcel 119)
- 2266591 Ontario Inc. (D'Orazio Group) (Parcel 116)
- Seconfar Holdings Limited (D'Orazio Group) (Parcel 115)
- Primont Homes (Heritage Heights 1) Inc. (Parcel 114)
- Primont Homes (Heritage Heights 3) Inc. (Parcel 129)
- Primont Homes (Heritage Heights 4) Inc. (Parcel 168)
- Pulcher Holdings Ltd. (Primont Homes) (Parcel 162)
- Wanless Properties Ltd. (Parcel 124)
- Amber Forest Land Development Corporation (Great Gulf Homes) (Parcel 99)
- Tiber Brampton Holdings Inc. (Parcel 147)
- Mattamy Homes (Parcel 115/116)
- Argo TFP Brampton III Limited (Parcel 93/94/95/96)

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CAUTION**

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- Argo TFP Brampton IV Limited (Parcel 215)

The HHLOG owns approximately 492 hectares (1,215 acres) within the proposed Secondary Plan Area 52 – Heritage Heights (“HHSP Area”) located in the City of Brampton (“City”). HHLOG has been a continuously active participant in the planning of the North West Brampton community, including participating and commenting throughout the Secondary Plan preparation process. HHLOG has engaged with the City on its Official Plan Review process and while previous comments/submissions have mainly been in the form of meetings and verbal discussions with City staff, we would like to formalize those comments in our written submission herein.

HHLOG continues its support in the development of complete, walkable and sustainable communities and we support the City’s efforts to create a more strategic and directions oriented Official Plan than what is currently contextualized in the current Official Plan. While most of the New Official Plan policies look to be formulated as visions and directions, there are policies that are more descriptive, prescriptive and/or unrealistically implementable.

To be clear, while this is a common comment letter for all of our clients and while our clients share these common concerns, the NWBLG and the individual participating landowners listed above are all separate and independent owners who may provide additional submissions to the City.

POLICIES OF CONCERN

Our comments are intended to assist the City in effective ‘City building’ which is the key pillar of the New Official Plan. We have organized our comments as per below such that it is easier for City staff to resolve/respond to our comments:

- Comments that require more information or clarification from City staff;
- Comments that we recommend tweaks to the policy wording to achieve the intent of the policy that can be effectively implemented; and,
- Comments that require review of the policies and require further refinements.

Policies that are not clear:

1. Sections 2.2.23 and 2.2.35 speak to prohibiting new automobile-oriented uses and development in Centres and Boulevards. It is not clear what is meant by ‘new automobile-oriented’ uses and development. This needs to be clarified before further comments on this section is provided.
2. Section 2.2.64 is not a complete policy that seems to be missing the list of criteria for development in new Neighborhoods. This needs to be corrected before further comments on this section is provided.



3. Section 2.3.167 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.

Policies that should be tweaked:

1. Our review of the Natural Heritage System (NHS) overlay on the land use schedules seems to be based on outdated info/mapping on some locations such as the Heritage Heights Secondary Plan area. The City ought to use the latest NHS mapping information - otherwise the New Official Plan is reflecting NHS features that are either no longer exist or that were assessed previously as not significant.

Furthermore, all Official Plan schedules that show the NHS should not require an OPA if refined through Subwatershed Study, area-specific Environmental Impact Study/Assessment or some other forms of site analysis. Any update to the NHS system shown in the Official Plan should be part of the housekeeping exercise as part of the next Official Plan Review. There should be a policy that makes this clear.

2. Section 2.1.16 speaks to providing for 'minimum' growth forecasts on Table 1. The use of the word 'minimum' implies that if the City does not achieve the minimum forecasts, it infers that the New Official Plan implementation may not be successful. We don't believe that this was the intent of this section. As such, we suggest that the word 'minimum' be changed to 'target' so that these forecasts are directions that the City strives to achieve but if not achieved, the actual growth that is less than the forecasts can still be successful.
3. Sections 2.2.24 and 2.2.36 restrict all surface parking in Centres and Boulevards. We feel that this is very restrictive and difficult to implement since some surface parking is required (such as retail/commercial parking, lay-by parking, delivery/service parking). This section should be revised to state that parking will 'mainly' be located underground.
4. Section 2.2.249 requires additional 5 metres for trails adjacent to or within the ecological buffer. This policy is very explicit and inflexible that removes the opportunity to explore recreational trails that may not warrant additional 5 metres or part of the trail could be within the ecological buffer. As such, we suggest that this policy state that recreational trails proposed within the ecological buffer will 'generally' require additional 5 metres.



Policies that require another review:

1. If the City is truly prioritizing walkable neighbourhoods, then the Employment Areas need to be more flexible in allowing for retail/commercial uses to facilitate 15-minute walkable neighbourhoods. The City provides for a large contiguous Employment Areas that would not be walkable to nearby retail/commercial areas if these uses are not permitted. The focus of creating distinctive land use designations that may impede 15-minutes walkable neighbourhoods needs to be adjusted through land use policy that permit 15-minute walkability to commerce and place of residence.
2. Section 2.1.33(e) requires Regional Official Plan Amendment for those 'planned' Major Transit Station Areas (MTSA's) that becomes Primary Major Transit Station Areas. We do not feel that this is appropriate or necessary. The inclusion of the new Primary Major Transit Station Areas should be updated as part of the Region's next Official Plan Review as part of its housekeeping process.

One of the 'planned' Major Transit Station Areas is designated in the Heritage Heights Secondary Plan area. We look forward to working with the City through the Heritage Heights Precinct Planning process, where refinements to the policies around planned MTSA's are determined and implemented through further amendment to the City's Official Plan.

3. There are inconsistencies in the planned function of Mississauga Road north of Bovaird Drive as opposed to south of Bovaird Drive. On Schedules 1 and 2, Mississauga Road south of Bovaird Drive is designated as a 'Corridor' but there is no Corridor designation north of Bovaird Drive. Bovaird Drive is designated as 'Planned Corridor' and 'Corridor' and Sandalwood Parkway is designated as 'Planned Corridor' that terminates on Mississauga Road. Also on Schedule 3B, Mississauga Road north of Bovaird Drive is designated as 'Future Rapid Transit Route' that promotes higher intensity and densified urban forms along the route.

It is good planning to continue to plan Mississauga Road from Bovaird Drive to Mayfield Road as a 'Planned Corridor' to complete the urban structure and to allow the Planned Corridor on Sandalwood Parkway to have a contiguous looped corridor rather than terminating it on an arterial road. Mississauga Road north of Bovaird Drive is already being planned with more urban and densified built forms in the Mount Pleasant Secondary Plan and the Heritage Heights Secondary Plan areas so it is only logical and good planning for the New Official Plan to recognize the importance of Mississauga Road as a Corridor. Based on the explanation of what a Corridor is in the New Official Plan, this section of Mississauga Road meets the criteria in the New Official Plan for a Corridor.

The section of Mississauga Road north of Bovaird Drive will be widened and urbanized to a 6-lane Regional road in the near future. Mississauga Road will be an important north-south link for both the Heritage Heights and the Mount



Pleasant communities. We are of the opinion that a 6-lane Regional Road with Rapid Transit would create a Corridor for mixed use development, tall buildings and intensification.

4. Section 2.3.226 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 the Region will 'require' these targets is very onerous and is not reflective of changing market conditions. As such, we recommend that the word 'require' be changed to 'strive towards' so that there is opportunity and 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. In our previous discussions on this matter, we repeatedly expressed and advised City and Regional staff of this and as such, 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 initiative/investment from all levels of government, these targets, if maintained as is, are not achievable.

We thank you for the opportunity to provide our comments on the City's New Official Plan. We welcome further discussion/meeting to discuss and elaborate on our comments to work towards a solution for a more effectively implementable Official Plan. We look forward to staff response.

Yours truly,



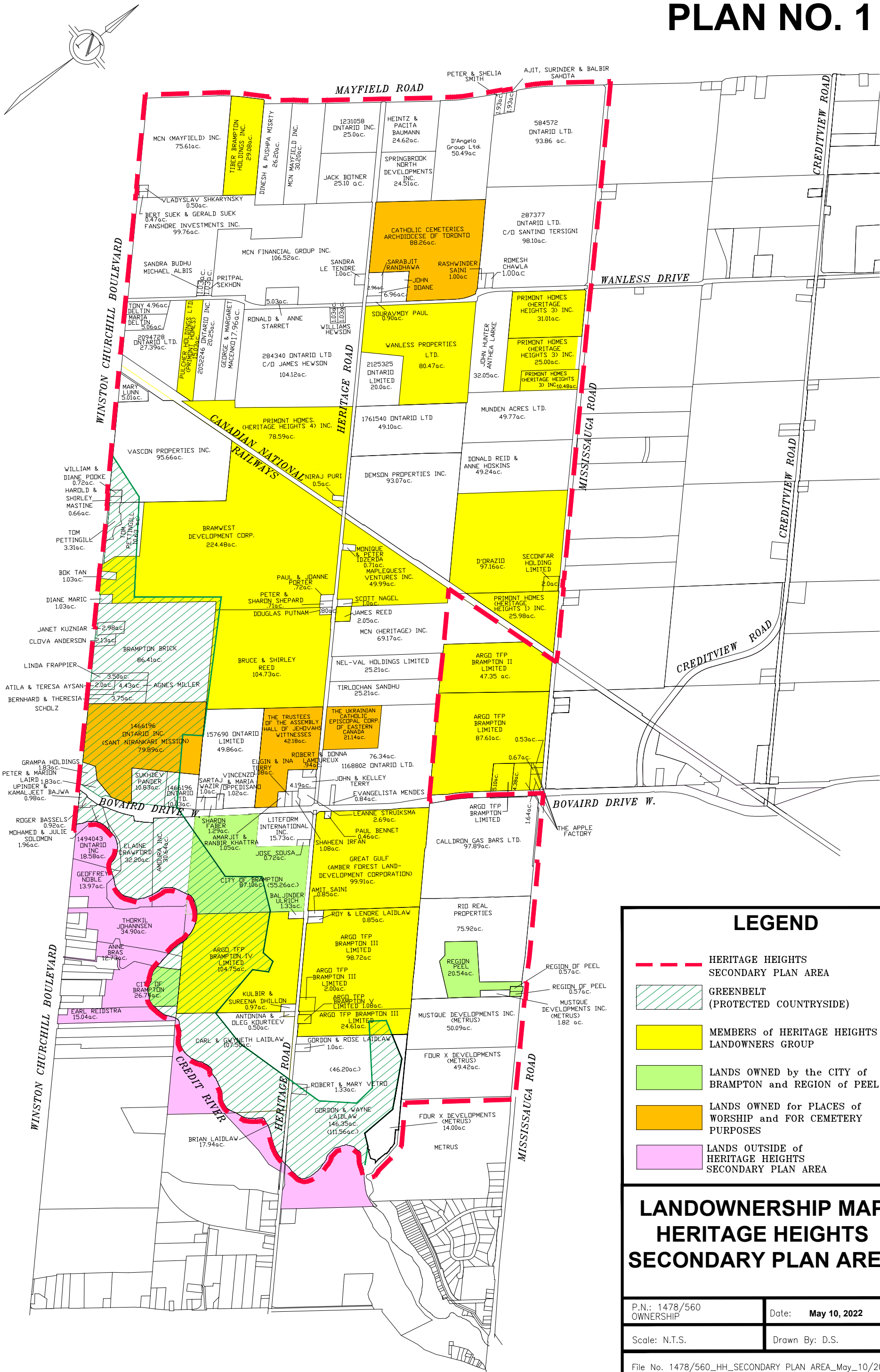
Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Managing Principal Planner



Colin Chung, M.C.I.P., R.P.P.
Managing Partner

c.c. **Andrew McNeil, City of Brampton**
Heritage Heights Landowners Group Members
A. Walker, Gagnon Walker Domes Ltd.
H. So, Glen Schnarr and Associates Inc.

PLAN NO. 1



LEGEND

- HERITAGE HEIGHTS SECONDARY PLAN AREA
- GREENBELT (PROTECTED COUNTRYSIDE)
- MEMBERS of HERITAGE HEIGHTS LANDOWNERS GROUP
- LANDS OWNED by the CITY of BRAMPTON and REGION of PEEL
- LANDS OWNED for PLACES of WORSHIP and FOR CEMETERY PURPOSES
- LANDS OUTSIDE of HERITAGE HEIGHTS SECONDARY PLAN AREA

LANDOWNERSHIP MAP
HERITAGE HEIGHTS
SECONDARY PLAN AREA

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|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| P.N.: 1478/560 OWNERSHIP | Date: May 10, 2022 |
| Scale: N.T.S. | Drawn By: D.S. |
| File No. 1478/560_HH_SECONDARY PLAN AREA_May_10/2022 | |
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