



Principals

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GWD File PN 22.3124.00
'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
Manga (Queen) Inc.
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Manga (Queen) Inc. the Registered Owner of 249 Queen Street East, in the City of Brampton (hereinafter referred to as the "subject site"). We have been asked to review and provide the City of Brampton with our comments, observations and recommendations on the 'new' Draft Brampton Plan (Official Plan).

A formal Development Pre-Application Consultation Meeting (PRE-2022-0023) was held on March 11, 2022 regarding the proposal to develop the subject site for mixed-use Residential and Commercial purposes.

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 (it is 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 the moment that Council approves the document.

On behalf of Manga (Queen) Inc., we offer the following comments, observations and recommendations dealing with the draft 'new' Official Plan:

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1. **Sections 2.1.3 and 2.1.4** directs that the tallest buildings will be directed to Urban Centres, and that within Boulevards and Major Transit Station Areas. The policy also states that taller buildings may be permitted subject to the implementation of other policies of the Official Plan. The subject site is located along a Primary Urban Boulevard and within a Planned Major Transit Station Area. **Table 4** identifies that within Primary Urban Boulevard Areas that the building typology should be Low-Rise Plus and Mid-Rise. It is recommended that the policy include flexibility to allow for greater building heights where appropriate. The policy as currently drafted will not likely achieve the Municipality's intended housing and residential objectives.
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. **Section 2.1.33.c)** identifies that: *"Where a City-initiated study of a Major Transit Station Area has not been initiated or approved by way of an amendment to Brampton Plan, the City may require the coordination of development applications between applicants, by way of a Secondary Plan and/or Precinct Plan at the cost of the applicant. The Secondary Plan and/or Precinct Plan will be subject to the applicable policies of the overlapping Centre or Boulevard, or other similar approaches to ensure an orderly, coordinated, and phased approach to the provision of Civic Infrastructure prior to or coincident with development."*

Secondary Plans, Block Plans and/or MTSA Plans, where required by the City of Brampton, should not necessarily be a cost which is to be shouldered by individual or groups of development proponents. The size and scope of the aforementioned planning exercises, within the Urban Built-up Area can involve a great many individual landowners and as such the cost should be borne by the City of Brampton.

It may be appropriate, subject to further consideration, to require individual proponents to absorb the costs when pre-existing plans are being amended on a site-specific basis. The majority of the lands located within the City's Primary and Planned MTSA's, Centres and the Urban Growth Centre do not currently have Precinct Plans in place and as such it could be an onerous financial responsibility to require individual stakeholders to fund their preparation; assuming that they are actually required (something which is debateable).

We recommend that **Section 2.1.33.c)** be modified to delete the reference to the cost of 'new' Secondary Plans, Block Plans, Precinct Plans and/or MTSA Plans, as being something, which needs to be borne by individual and/or a group of development proponents.

4. 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?
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 objective is to ensure that the policy is objective as opposed to subjective.

6. The policy at the bottom of Page 2-33 as well as **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. **Section 2.2.2 a)** speaks to higher density development within Mixed-Use Districts that are identified as Primary Major Transit Station Areas. **Table 5** limits building types in the aforementioned areas to Mid-Rise only; with the opportunity to pursue a Tall or Tall Plus building only through a site-specific assessment. We recommend that the policy be revised to facilitate greater flexibility, without the need to undertake a site-specific assessment; especially in situations where as in the case of the subject site, the property in question is located on a BRT Line.
8. **Sections 2.2.26 e)** and **2.2.36** restrict all surface parking in Boulevards (including within Primary Urban Boulevards). This is a restrictive policy and we believe that it may be difficult to implement, since there are instances where surface parking is/may be required (i.e., serving retail/commercial developments with parking, lay-by parking and delivery/service parking). We recommend that this section be revised to state that parking will 'mainly' be located underground.
9. **Housing and Social Matters Chapter** (Pages 2-195), **Sections 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'.
10. Similarly, **Housing and Social Matters Chapter** (Pages 2-195), **Sections 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 for 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. 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 play 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 and affordable housing development initiatives, and investment by all levels of government, these targets, (if maintained) are not achievable.


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,



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cc: Adrian Smith, Region of Peel
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