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'New' BOP 2022

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

Subject: FORMAL PUBLIC INPUT
Pulis Investment Group
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Pulis Investment Group, the Registered Owner of 507 Balmoral Drive 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 Application (PRE-2022-0037) was filed on March 4, 2022 and the mandatory Consultation Meeting with City Planning Staff was held March 30, 2022. Through the Pre-Application Consultation process the City and external agencies confirmed that a Secondary Plan Amendment and Zoning By-law Amendment would be required. Our Client is currently in the process of finalizing technical plans, reports, and studies in support of the re-development of the subject site for three (3) residential apartments having buildings heights of 6, 12, and 30-storeys.

Preliminary Policy and Zoning Review

The 2006 City of Brampton Official Plan (September 2020 Consolidation) designates the subject site as 'Residential'.

The Bramalea Secondary Plan (Area 3) (October 2019 Consolidation) designates the subject site as 'High Density Residential'.

Comprehensive Zoning By-law No. 270-2004; as amended; zones the subject site 'Residential Apartment A(1) – Section 101'.

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Draft Brampton Plan (Official Plan)

We have reviewed the Draft Official Plan which was released on April 26, 2022.

1. The following is an overview of the designations and overlays that apply to the subject site within that Draft Official Plan:

Schedule 1 – City Structure

- 'Neighbourhoods'
- 'Secondary Urban Boulevards' (*Bramalea Road*)

Schedule 2 – City-Wide Growth Management

- 'Neighbourhoods'
- 'Secondary Urban Boulevards' (*Bramalea Road*)

Schedule 3B – Transit Network

- 'Frequent Transit' (*Bramalea Road*)
- 'Future Rapid Transit Routes' (*Bramalea Road*)

Schedule 4 – Provincial Plans & Policy Areas

- 'Built-Up Area'

Schedule 5 – Designations

- 'Neighbourhoods'

2. **Section 1.1.7.b.** states that policies of the Plan are general in nature and are intended to be supplemented by Secondary-Level Plans. Land uses and designations approved prior to the implementation of this Plan, and legally in existence prior to the implementation of this Plan, will be permitted to be established and continue without an amendment to the Plan.
3. **Section 2.1.2.b** states that Boulevards are vibrant and prominent streets in the City, serving as destinations in themselves, but also providing critical connections to the rest of the city and region and serving nearby communities.
4. **Section 2.1.2.d** states that Neighbourhoods reflect new and existing lower-scale residential, commercial, and institutional areas in the City.
5. **Section 2.1.6** states that Neighbourhoods will be planned at a lower scale than Centres, Boulevards, and Corridors and will accommodate the lowest densities and building heights, while providing a full range and mix of housing options.
6. **Section 2.1.21.c** states Intensification in Brampton will be accommodated, subject to the policies of this Plan, by: Promoting gentle intensification in Neighbourhoods. Neighbourhoods will continue to evolve through infill development on underutilized vacant properties and lands, the adaptive reuse of existing buildings, and the establishment of additional residential units, as appropriate.



7. **Section 2.2.2.b** states that the Neighbourhood designation is found throughout the City and will support the achievement of 15-minute neighbourhoods. They are to include a broad range of residential uses together with neighbourhood supportive commercial and community services and facilities that serve and support the residents of these neighbourhoods. The intensity of development and range of uses that may be permitted varies depending on the street typology that the property fronts onto, in addition to a number of other factors.
8. Secondary Urban Boulevards are streets with a mix of uses which provide a transition in scale and intensity of use between Primary Urban Boulevards and other areas of the city. Secondary Urban Boulevards connect key destinations, such as major shopping and employment areas and serve surrounding Neighbourhoods.
9. **Section 2.2.25** states that Boulevards will be transformed incrementally over the Official Plan's horizon. Primary and Secondary Urban Boulevards will change building-by-building over a number of years and will vary in terms of intensity, form, and scale.
10. **Section 2.2.28 to 2.2.31** address Boulevard intensity. New development within Boulevards will have regard for the existing character and built form of adjacent Neighbourhoods and provide transition in accordance with the design policies of this Plan. Implementing Secondary Plans and Zoning By-laws will include policies and regulations to ensure that the intensity of development is appropriate for individual sites. Development is to achieve a high level of design excellence.
11. According to **Table 4** lands designated Neighbourhoods on **Schedule 5** will comprise of a Low-Rise building typology. Additional permissions include Low-Rise Plus within 400 metres of a Support Corridor shown on **Schedule 3B**. Lands with frontage along Secondary Urban Boulevards on **Schedule 2** will comprise of Low-Rise Plus, and Mid-Rise building typology. In limited areas, there may be opportunities for Tall buildings subject to a City-initiated Secondary Plan.
12. According to the Building Typologies Table within the Glossary Section of Chapter 3 Implementation and Measurement, Low-Rise Plus Buildings shall have a height range up to and including 4-storeys, Mid-Rise Buildings will have a height ranging between 5 and 12-storeys, and Tall Buildings will range between 13 and 25-storeys.

Prior to Council approving the 'new' Official Plan, we respectfully request confirmation that the development proposal advanced by [PRE-2022-0037](#) conforms to the Draft Official Plan. Based on our interpretation of policy and mapping, there are no land use conflicts and the proposal generally satisfies the additional permissions criteria.

Policy Modification

1. **Section 2.1.6** and **Table 4** should be revised to provide greater flexibility to permit increases in building height in strategic locations where appropriate. In the case of the subject site the abutting lands and greater area context is established and a new Secondary Plan is unwarranted. The subject site is already designated High Density with



the current Secondary Plan. An amendment to the Secondary Plan to guide the re-development of the property is more appropriate.

2. **Section 2.2.64** does not appear to be a complete policy. It is missing the list of designation/overlays and criteria for development of 'new' Neighbourhoods. The policy needs to be corrected and re-issued for public review and comment before it can be advanced to Council for approval.
3. **Section 2.1.21.c** should be modified to state that appropriate intensification should be promoted in Neighbourhoods located outside of Centres, Major Transit Station Areas and Corridors.
4. **Section 2.3.277 to 2.3.281** addresses conversion and/or demolition of a residential rental building with six (6) or more dwellings units if the City's average rental vacancy rate is below 3%.

On June 22, 2020 Council directed City Staff to undertake the development of a rental protection policy to address residential rental conversions and demolitions. On October 18, 2021 a Statutory Public Meeting was held.

Pursuant to consultation with Senior Planning Staff in early February 2022 a transition policy was to be included exempting projects that are already in process. It is our understanding that as of March 2022 the exercise was put on hold in order to assess options prior to advancing a Recommendation Report.

The Draft Official Plan includes rental conversion and demolition policy that does not speak to exemptions. Introducing this new policy prior to the completion of the City exercise is not appropriate. The consultation process with interested stakeholders is ongoing. We recommend that policy be removed from the Draft Official Plan and deferred to a future amendment. We also recommend that the policy specify scenarios where exemptions are permitted including:

- Development, Site Plan Approval, Plan of Subdivision, Plan of Condominium, or Building Permit Applications received on or before the date of adoption of the amendment to the Brampton Plan.
5. **Section 2.3.257** should be modified to state that Development applications may be required to submit a Housing Assessment Report, to be approved prior to approval of any Secondary Plan, and any Secondary Plan amendment, Precinct Plan or Phasing Plan. A Housing Report was not requested by the City or the Region in the Pre-Application Consultation checklist provided by the City of Brampton. The Policy should be flexible to exempt development proposals from the requirement of a Housing Assessment/Analysis where deemed appropriate, in the consideration of the location, scale, and type of application being filed and where sufficient information is available to inform its purpose.



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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