



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

June 3, 2022

GWD File: 2298

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

Attention: Members of City of Brampton Council

-AND-

**Jason Schmidt-Shoukri,
Commissioner, Planning, Building & Economic Development**

**Subject: City of Brampton Official Plan Conformity Review
Public Input – Draft New City of Brampton Official Plan
226 Queen Street East & 10-12 June Avenue, City of Brampton, Ontario
2556830 Ontario Inc.**

Gagnon Walker Domes Ltd. ("GWD") is agent to 2556830 Ontario Inc.; the registered owner of the property municipally known as 226 Queen Street East and 10-12 June Avenue in the City of Brampton ("subject site"). The subject site measures approximately 0.70 hectares (1.73 acres) with street frontages along Queen Street East and June Avenue. The subject site is currently developed as a 6-storey hotel building (the "Marigold Hotel") with associated motor vehicle rental establishment, as well as two (2) single detached dwellings (10-12 June Avenue). A large portion of the subject site consists of surface parking. The subject site, as developed in its current form, is underutilized.

The subject site is generally located at the northwest quadrant of the major intersection of Queen Street East and Kennedy Road, which features a number of high density residential and mixed use developments as well as low-rise retail uses.



GAGNON WALKER DOMES LTD.

21 Queen Street East, Suite 500 • Brampton ON Canada L6W 3P1 • P: 905-796-5790
3601 Highway 7 East, Suite 310 • Markham ON Canada L3R 0M3 • P: 905-477-6556
www.gwdplanners.com • Toll Free: 1-855-771-7766



EXISTING LAND USE DESIGNATIONS OVERVIEW

2006 City of Brampton Official Plan

The current 2006 City of Brampton Official Plan (“BOP”) designates/identifies the subject site as follows:

- ‘Central Area’ (Schedule 1 - City Concept);
- ‘Urban Growth Centre’ (Schedule 1A – Urban Growth Centres);
- ‘Central Area’ (Schedule A - General Land Use Designations).

The City’s designated Central Area, including the Urban Growth Centre, serves as the major location for free-standing or mixed-use development including a full range of:

- Residential;
- Office, Retail and Service Activities; and
- Entertainment, Institutional and Cultural Uses.

2020 Queen Street Corridor Secondary Plan

The subject site is also located within the Queen Street Corridor Secondary Plan Area, which designates/identifies the subject site as follows:

- ‘Central Area Mixed-Use’ Land Use Designation;
- Density: 3.5 FSI.

Permitted uses within lands designated ‘Central Area Mixed-Use’ in the Secondary Plan include any combination of:

- Commercial, Retail, Office;
- Residential;
- Hotel, Entertainment, Institutional and Cultural Uses.

Notwithstanding the identified permitted density of 3.5 FSI, pursuant to the Secondary Plan developments that exceed the identified density permissions shall be permitted without an amendment to the Secondary Plan, subject to the approval of a site specific Zoning By-law Amendment.

2556830 ONTARIO INC. DEVELOPMENT PROPOSAL/ FORMAL AMENDMENT APPLICATION

2556830 Ontario Inc. submitted a formal Zoning By-law Amendment Application to the City of Brampton in May 2022 (City File: OZS-2022-0028). The Amendment Application proposes the redevelopment of the subject site for a mixed use development featuring two (2) towers ranging between 35-45 storeys in height oriented along Queen Street East. The development proposal envisages approximately 940 new residential units along with approximately 2,514 m² (27,000 ft²) of street related commercial (office and retail).

Leading up to the submission of the formal Amendment Application our Client participated in a number of meetings with City Staff to discuss the development proposal, including Pre-



Application Consultation Meetings on July 14, 2021 and March 25, 2022. Pursuant to the Pre-Application Consultation and corresponding circulation comments/checklist, City Staff advised that only a Zoning By-law Amendment Application (“Amendment Application”) would be required to facilitate the approval process. An Official Plan Amendment was not identified as being required.

A corresponding Site Plan Application is scheduled to be submitted in June 2022.

BRAMPTON OFFICIAL PLAN CONFORMITY REVIEW/ NEW “BRAMPTON PLAN”

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

Recently, on April 26, 2022, the City of Brampton released the draft new City of Brampton Official Plan (“Brampton Plan”) for public review and comment. The City has since requested that public comments and concerns on the draft Brampton Plan be provided by June 3, 2022. It is understood that the new Brampton Plan is targeted for final adoption by the City Council on July 6, 2022.

In consideration of the extent of the proposed Official Plan policy updates and the impacts that the new proposed policy framework may have on residents, businesses, employees and various landholders, the short 71 day review period provided to the general public is insufficient and does not represent meaningful and appropriate public consultation. Given that the *Planning Act* does not require that the City of Brampton proceed to final consideration of the draft Brampton Plan in such a truncated fashion, it is only appropriate that stakeholders be provided with additional time to review the draft policy framework and work with City Staff to discuss their questions or concerns in effort to have them addressed, where deemed appropriate, prior to final City of Brampton Council consideration. We do not believe the review, comment and consultation period that has been provided is sufficient.

- **Proposed Process Modification:** City Council defer its consideration of a final Recommendation Report on July 6, 2022 to Q3/Q4 2022 to provide additional time and opportunity for stakeholders with an identified interest to discuss identified policy concerns with City/Regional Staff and have revised draft policy issued, where appropriate, prior to final Council consideration of the Brampton Plan.

DRAFT NEW “BRAMPTON PLAN” LAND USE DESIGNATION OVERVIEW

The following are some of the key designations and overlays of the draft Brampton Plan that are proposed to apply to the subject site:

- **Schedule 1 - City Structure:**
 - ‘Neighbourhoods’;
 - ‘Primary Urban Boulevards’ / ‘Corridors’ (Queen Street);
- **Schedule 2 - City-Wide Growth Management:**
 - ‘Primary Major Transit Station Areas’;



- Schedule 4 - Provincial Plans & Policy Areas:
 - 'Urban Growth Centre';
- Schedule 5 – Designations:
 - 'Mixed-Use Districts'.

2556830 ONTARIO INC. CONCERNS WITH DRAFT NEW “BRAMPTON PLAN”

Based on our preliminary review of the draft Brampton Plan, the following are 2556830 Ontario Inc.'s comments and concerns. Recommended policy redlines are included in Appendix 1.

A. General Concerns

Applicability of Brampton Plan:

- Policy 1.1.7.b) reads, *“Land uses and designations approved prior to the implementation of Brampton Plan, as well as uses legally in existence prior to the implementation of this Plan, will be permitted to be established and continue without an amendment to the Brampton Plan.”*

Policy 3.1.91 states, *“Planning and development applications filed after the adoption of Brampton Plan by Council and prior to the approval of this Plan by the Region will be encouraged to work with the City to consider the implications of the policies of Brampton Plan as they relate to the proposed application.”*

In accordance with draft Policy 1.1.7.b), the subject site should continue to be designated as Central Area in the draft new Brampton Plan to reflect the current land use permissions for the subject site and its role within the City Structure. The City's Central Area and Urban Growth Centre have been the primary focus for the accommodation of the City's planned growth, at the City's highest intensity, since the City's adoption of the current BOP in 2006.

The proposed designations and overlays for the subject site, as identified in the draft new Brampton Plan, effectively down-designates the subject site within the City hierarchy by removing it from the Central Area designation and omitting it from the conceptual limits of the new Urban Centre overlay that is centred in the City's Downtown.

The subject site should be identified in the new draft Brampton Plan as being an appropriate location for amongst the highest, most intense mixed use development in the City Structure.

The City should consider a transition clause(s) for those in-process development applications submitted prior to the final enactment of the Brampton Plan.

- **Required Policy Clarification:** Please provide clarification on the above noted policies including an explanation of how the City intends on addressing development applications that have been submitted to the City in advance of City



Council approval of the new draft Brampton Plan and/or in advance of Region of Peel approval.

- **Proposed Schedule Modification:** Subject to the City's response to the concern above, Schedule 1-City Structure and Schedule 2-City-Wide Growth Management be modified to include the subject site within the limits of the Urban Centre that is centred in the City's Downtown.

Additional and/or revised comments may be provided depending on the municipal response to the above.

B. City Structure

Part 2.1 of the Brampton Plan outlines the proposed City Structure which consists of the City-Wide Growth Management Framework and Mobility Framework. The City-Wide Growth Management Framework, as identified on Schedule 2, is comprised of 'Centres', 'Boulevards', 'Corridors', 'Neighbourhoods', 'Employment Areas', and the 'Natural Heritage System'.

Urban Growth Centre and Proposed Urban Centres

- As noted above, the City's Central Area and Urban Growth Centre have been the primary focus for the accommodation of the City's planned growth, at the City's highest intensity, since the City's adoption of the current BOP in 2006. Pursuant to the Provincial Growth Plan, the Urban Growth Centre is an area of Provincial significance that is to accommodate amongst the highest density and built form in the City of Brampton.

It is with this policy framework in mind that our Client made the substantial investment to purchase the subject site and subsequently submit an Amendment Application for mixed-use, high density, transit-oriented redevelopment.

However, the proposed policy framework concerning the Urban Growth Centre has been substantially removed from the draft Brampton Plan. In fact draft Schedule 2, which is intended to outline the City-wide growth management framework, oddly fails to even identify the Urban Growth Centre.

Through our review it appears that 'Urban Centres', which are proposed nodal growth areas within the City, have replaced the linear Urban Growth Centre and Central Area at the top of the City's growth management hierarchy. These proposed nodal Urban Centres however, do not include the full extent of the Urban Growth Centre and the current BOP's Central Area. The result of this proposed change is that much of the lands between Trueman Street in the west and West Drive in the east which are currently identified within the BOP's Central Area and Urban Growth Centre have been down-graded to lower tiers within the City Structure which are planned to be subservient in size and intensity to the Urban Centres.

In the case of the subject site, while it is located within the Urban Growth Centre it is being down-graded from the Central Area to 'Primary Urban Boulevards' and 'Corridors'.



It appears through our review of the draft new Brampton Plan that the Urban Growth Centre has been generally overlooked and/or disregarded in the planning of growth within the City. On this basis it is our opinion that the draft Brampton Plan does not conform to the Growth Plan.

- **Proposed Schedule Modification:** Schedules 1 and 2 be modified to include the limits of the City of Brampton Urban Growth Centre.
- **Proposed Policy Modification:** Part 2.1 of the draft Brampton Plan be updated to include the City's Urban Growth Centre as one of the primary elements of the City Structure and City-Wide Growth Management Framework.
- Policy 2.1.2.a) reads, *"Centres are those areas of Brampton where the highest concentration of growth and mix of uses is planned to occur. They connect residential and non-residential opportunities and enhance the ability for more residents to live, work, and play locally. Centres are comprised of Urban Centres and Town Centres."*
 - **Proposed Policy Modification:** Policy 2.1.2.a) be modified to include the inclusion of the Urban Growth Centre as part of the City's Centres.
- Policy 2.1.3 reads, *"The tallest buildings will be directed to Urban Centres. Within Boulevards and within Major Transit Station Areas, taller buildings may permitted subject to the applicable built form, design and implementation policies of this Plan."*
 - **Proposed Policy Modification:** Policy 2.1.3 be modified to include reference to the Urban Growth Centre as a location where the tallest buildings will be directed in addition to the Urban Centres.
- Policy 2.1.21.a) reads, *"Intensification in Brampton will be accommodated, subject to the policies of this Plan, by: .a Directing intensification and highest densities and heights primarily within Urban Centres, which includes the Downtown Brampton Urban Growth Centre, Town Centres, Boulevards, along Corridors and within Major Transit Station Areas..."*

Policy 2.1.30 reads, *"To optimize the use of land in Brampton, a significant portion of growth will be directed to Centres and Boulevards. Table 2 establishes the minimum density targets for each Centre which includes the city's Urban Growth Centre, and other nodes and corridors identified in the Region of Peel Official Plan."*

Policy 2.2.3.a), reads, *"The Urban Centre and Town Centre are conceptual overlays which indicate the City's principal locations for growth, accommodate important regional amenities, and provide for the greatest intensity, form, and scale in Brampton."*

While there is an acknowledgement to the Urban Growth Centre in Policies 2.1.21.a) and 2.1.30 as being a location for the heights densities and heights in the City, it is unclear if this policy is restricted to those areas which are both located within the Urban Growth Centre and an Urban Centre, or if it suggesting that lands within the Urban Growth Centre are also to be considered as being located within the Urban Centre. In the case of the subject site, while it has been historically planned to accommodate



amongst the highest buildings and density in the City, the draft Brampton Plan does not include a clear understanding of whether the lands are planned to accommodate the amongst the tallest buildings and highest density within the City.

- **Proposed Policy Modification:** Policy 2.1.21.a), Policy 2.1.30 and Policy 2.2.3.a) be modified to provide clear policy direction that the Urban Growth Centre is a location where the tallest buildings will be directed in addition to the Urban Centres.
- Policy 2.1.33.a) directs that where an MTSA is also within a Centre, the density and height policies governing the Centre will prevail. This policy should include similar reference to the Urban Growth Centre.
 - **Proposed Policy Modification:** Policy 2.1.33.a) be modified to provide clear policy direction that where conflict exists, the Urban Growth Centre policies of the plan in terms of building height and development density shall prevail.
- Table 3 identifies the City's Primary MTSA's, including their individual minimum density target and additional policy area considerations. However, the Kennedy MTSA does not include reference to the additional applicable policies of the Urban Growth Centre or an appropriate reference to the additional policies of the Urban Centre. The subject site should be located in the Urban Centre.

Policy 2.2.54 reads, "The minimum density for residential and mixed-use development within the Mixed-Use District designation will be the minimum density target established for the corresponding Major Transit Station Area identified in Part 2.1 of Brampton Plan."

- **Proposed Policy Modification:** Table 3 and Policy 2.2.54 be modified to provide reference to the additional policy direction pertaining to the Urban Growth Centre and Urban Centre for the Kennedy MTSA.
- **Proposed Schedule Modification:** Subject to the City's response to the concerns above, Schedule 1-City Structure and Schedule 2-City-Wide Growth Management be modified to include the subject site within the limits of the Urban Centre that is centred in the City's Downtown.

Neighbourhoods:

- Policy 2.1.2.d reads, "*Neighbourhoods reflect new and existing lower-scale residential, commercial and institutional areas of Brampton...*".

Policy 2.1.6 reads, "*Neighbourhoods will be planned at a lower-scale than Centres, Boulevards and Corridors, and will accommodate the lowest density and building heights while providing a full range and mix of housing options.*"

Policy 2.1.21 reads, "*Intensification in Brampton will be accommodated, subject to the policies of this Plan by...Promoting gentle intensification in Neighbourhoods...*"

The above noted policies are contrary to the Brampton Plan's intended Growth Management Framework. More specifically, the City's various Major Transit Station



Areas (“MTSAs”) are delineated in the new Brampton Plan, within which the underlying Growth Management Hierarchy is substantially comprised of the City’s Neighbourhoods. As a result, many of the Centres and MTSAs, where the tallest buildings in the City are to be directed, are also identified as being within the City’s Neighbourhoods where “lower-scale” uses are to be reflected.

- **Proposed Schedule Modification:** Schedules 1 and 2 be modified to remove Neighbourhoods from the delineated limits of the Urban Growth Centre, Urban Centres and MTSAs to remove this built form conflict within the City Structure and City-wide Growth Management Framework, and to clearly distinguish these areas based on their position as high intensity growth areas within the City Structure.

C. Secondary Plan, Precinct Plan, MTSA Plan and Area Plan:

Planning Process Prior to Implementation

- Policy 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.”*

Policy 2.1.49 reads, *“Where a Secondary Plan does not yet identify the location of Precincts, Precinct Plans will be required with the submission of any Draft Plan of Subdivision and/or significant Zoning By-law Amendment application within Centres, Boulevards, and with frontage onto Corridors to the satisfaction of the City and Region of Peel before approval of the application, in accordance with the policies of Part 2.2 and Chapter 3.”*

Policy 2.3.37 directs that Tall Plus buildings (buildings over 25 storeys) will only be permitted where they are identified in a City-initiated Secondary Plan and/or Precinct Plan.

Policies 3.1.52 through 3.1.58 deal with the requirement and context of Precinct Plans as part of submitted Draft Plan of Subdivision, Official Plan Amendment and/or Zoning By-law Amendment Applications.

Policies 3.1.59 through 3.1.65 deal with the requirement and context of Area Plans as part of complete planning applications.

Policy 3.1.66 deals with the requirement and context of a Primary Major Transit Station Study.

- Secondary Plans, Block Plans and/or MTSA Plans, where required by the City of Brampton, should not be at the cost of development proponents. The scope of these exercises within the urban Built-up Area, which may involve many landowners, should



be borne by the City of Brampton, unless these pre-existing plans are being amended on a site specific basis through individual Amendment Applications.

Draft Brampton Plan Policy 2.2.53 directs that existing Secondary Plans, or MTSA Plan studies will provide more specific direction for each distinct Mixed-Use District. In the case of the subject site, it is our opinion that the existing Queen Street Corridor Secondary Plan provides sufficient land use policy direction to advance a mixed use development on the subject site without the need for additional Secondary Plan, Precinct Plan, MTSA Plan and Area Plan approvals.

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.

Further, it is our opinion that the proposed multi-faceted approval process for the redevelopment of sites within the City's Strategic Growth Areas, which may include upwards of four (4) additional studies/plans to be approved through a public consultation process prior to Site Plan Approval, is excessive and unnecessary and will severely delay the facilitation of residential uses in the midst of an identified Housing Crisis as well as postpone the delivery of new jobs.

- **Proposed Policy Modification:** Policy 2.1.33.c) be modified to delete reference to the cost of new Secondary Plans and Precinct Plans being borne by the applicant.
- **Proposed Policy Modification:** Chapter 4 be modified to include a new Site and Area Specific Policy to exempt the subject site from additional Secondary Plan review and the approval of a Precinct Plan, MTSA Plan and Area Plan. Alternatively, Policies 2.1.33.c), 2.1.49, 2.3.37, 3.1.52, 3.1.54, 3.1.57, 3.1.63, 3.1.64, be deleted or amended as set out in Appendix 1 of this letter.
- **Proposed Policy Modification:** Policy 3.1.57 be modified to include private development proposals as part of the list of appropriate projects that may proceed to Zoning By-law Amendment and Site Plan Approval without an approved Precinct Plan.

D. Land Use Designations

Mixed-Use District Designation:

- The subject site is proposed to be designated 'Mixed-Use Districts' on Schedule 5 of the draft Brampton Plan.

Lands designated Mixed-Use Districts are associated with those lands identified as Primary MTSA's on Schedule 2 of the Brampton Plan. The Mixed-Use Districts designation is intended to accommodate a diversity of functions, a higher density of development, a greater degree of mixed uses, and higher level of transit connectivity than those areas outside Mixed-Use Districts.

- Table 4 identifies the built form typologies permitted within the Mixed-Use District designation. More specifically, according to draft Table 4 lands designated Mixed-Use



Districts are restricted to “Low-rise” buildings no higher than 3 storeys, unless a MTSA Study is conducted which identifies the permission for up to Tall Buildings (buildings no higher than 25 storeys).

The built form restrictions of Table 4 are inconsistent with the existing built form permissions in the applicable Secondary Plan which permits tall buildings up to and beyond a density of 3.5 FSI. The proposed new building height restrictions of draft Table 4 represents a significant reduction to current as-of-right permissions. It is our position that this building height restriction is not consistent with the Provincial Policy Statement and does not conform to the Growth Plan, which generally direct high intensity redevelopment and intensification to the Urban Growth Centre, and MTSA’s along Priority Corridors. Further Table 4 is inconsistent with the 2556830 Ontario Inc. development proposal, which contemplates building heights up to 45 storeys in height.

The determination of building heights for lands located within the Mixed-Use Districts designation should be determined on a case by case basis through the review of existing Secondary Plan Policy and site specific development applications.

- **Proposed Policy Modification:** Table 4 be modified to permit the full range of building typologies for the Mixed-Use District designation.

E. Built Form

Tall Buildings

- Policy 2.3.36 sets out built form policy for tall buildings including the requirement that a minimum of 25 metres be provided between towers.

This policy elevates urban design considerations to Official Plan policy which does not provide sufficient flexibility to allow for deviations to the minimum tower separation distance where deemed appropriate. Final tower separation distances should be included within site specific zoning by-laws.

- **Proposed Policy Modification:** Modify Policy 2.3.36 to encourage a 25 metre separation distance between towers and/or allow deviations on a case-by-case basis without the need for an amendment to the Brampton Plan.
- Policy 2.3.48 directs that the “Review for all Design Priority Areas and Tall Building developments by the Urban Design Review Panel is required for compliance with the Brampton Plan and City-Wide Urban Design Guidelines...”

The City’s Urban Design Review Panel are neither the approval authority, elected municipal officials or City employees. The role of the Urban Design Review Panel, and its members, is to provide design opinion and guidance to municipal Staff in review of development applications. Compliance of a tall building proposal with the Brampton Plan and/or City-wide Urban Design Guidelines is not to be determined by the City’s Urban Design Review Panel, but rather is the role and responsibility of City Staff and ultimately City Council.

- **Proposed Policy Modification:** Delete Policy 2.3.48.



E. Housing

Housing:

- Policies 2.3.257 and 3.1.85 direct that development applications will be required to submit a Housing Assessment Report/Housing Analysis, to be approved prior to approval of any Secondary Plan, and any Secondary Plan amendment, Precinct Plan or Phasing Plan.

A Housing Assessment Report was not requested by the City or Region in the Pre-Application Consultation checklist provided by the City of Brampton. The submission of a Housing Assessment Report shall not apply to the 2556830 Ontario Inc. Amendment Application.

Notwithstanding, it is recommended that these policies provide flexibility to exempt development proposals from the requirement of a Housing Assessment Report/Housing 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.

- **Proposed Policy Modification:** Replace the word “will” with “may” in reference to the preparation of a Housing Assessment Report/Housing analysis to provide flexibility to only require it to be provided when necessary and appropriate.
- Policy 3.1.77 directs that new developments with a minimum of ten residential units may be required to satisfy the inclusionary zoning policies of the Brampton Plan.

This policy is not sufficiently clear to identify that it will only apply to those developments of ten residential units or more where stipulated through a future inclusionary zoning amendment and By-law. Clarification should be provided in the policy.

- **Proposed Policy Modification:** Policy 3.1.77 be modified to clarify that the policy is only applicable to new developments required to provide inclusionary zoning pursuant to the *Planning Act*.

FINAL COMMENTS AND RECOMMENDATION

We request that City Staff meet with 2556830 Ontario Inc. and its core consulting team at its earliest opportunity to discuss the concerns as outlined herein, including but not limited to the removal of the subject site from the City's Central Area and the omission of the subject site in the new Brampton Plan from the Downtown Urban Centre.

As noted above, we believe additional consultation is required and that a final Recommendation Report should not be prepared or considered by City Council on July 6, 2022 in order for City Staff to properly consider and further discuss 2556830 Ontario Inc.'s concerns.

2556830 Ontario Inc. reserves the right to provide additional/revised comments based on the City of Brampton and/or Region of Peel response to the concerns identified herein and any



further reports/studies or draft Official Plan Amendments produced in connection with the draft Brampton Plan.

By way of this correspondence, we also respectfully request to be notified in writing of any and all future informal Open House and Statutory Public Meetings, as well as the tabling of Information and/or Recommendation Reports to Planning Committee/Council related to draft Brampton Plan/ Official Plan Review exercise; including all Notices of Decision.

Yours truly,

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

Richard Domes, B.A., C.P.T
Principal Planner

cc: 2556830 Ontario Inc.
W. Long, Nahid
J. Baker, Region of Peel
A. Smith, Region of Peel
A. Parsons, City of Brampton
A. McNeill, City of Brampton



APPENDIX A

Policy/Schedule	Proposed Policy/Schedule Modification
Schedule 1-City Structure 'Neighbourhoods'	<p>Remove subject site and area within 'Urban Growth Centre', 'Urban Centres' and 'MTSAs' from 'Neighbourhoods'</p> <p><u>Add 'Urban Growth Centre'</u></p> <p><u>Add subject site to the limits of the 'Urban Centre'</u></p>
Schedule 2-City-Wide Growth Management 'Neighbourhoods'	<p>Remove subject site and area within 'Urban Growth Centre', 'Urban Centres' and 'MTSAs' from 'Neighbourhoods'</p> <p><u>Add 'Urban Growth Centre'</u></p> <p><u>Add subject site to the limits of the 'Urban Centre'</u></p>
Policy 2.1.2.a - Centres are those areas of Brampton where the highest concentration of growth and mix of uses is planned to occur. They connect residential and non-residential opportunities and enhance the ability for more residents to live, work, and play locally. Centres are comprised of Urban Centres and Town Centres.	Policy 2.1.2.a – <u>The Urban Growth Centre and</u> Centres are those areas of Brampton where the highest concentration of growth and mix of uses is planned to occur. They connect residential and non-residential opportunities and enhance the ability for more residents to live, work, and play locally. Centres are comprised of Urban Centres and Town Centres.
2.1.3 - The tallest buildings will be directed to Urban Centres. Within Boulevards and within Major Transit Station Areas, taller buildings may permitted subject to the applicable built form, design and implementation policies of this Plan.	2.1.3 - The tallest buildings will be directed to <u>the Urban Growth Centre and</u> Urban Centres. Within Boulevards and within Major Transit Station Areas, taller buildings may permitted subject to the applicable built form, design and implementation policies of this Plan.
<p>2.1.21 - Intensification in Brampton will be accommodated, subject to the policies of this Plan, by:</p> <p>.a Directing intensification and highest densities and heights primarily within Urban Centres, which includes the Downtown Brampton Urban Growth Centre, Town Centres, Boulevards, along Corridors and within Major Transit Station Areas.</p> <p>.b Promoting a variety of built form in Corridors and Boulevards. Development in these areas will respond to the existing and planned built form context in Neighbourhoods, subject to the transition, form and design policies of this Plan.</p>	<p>2.1.21 - Intensification in Brampton will be accommodated, subject to the policies of this Plan, by:</p> <p>.a Directing intensification and highest densities and heights primarily within Urban Centres, which includes the Downtown Brampton Urban Growth Centre, Town Centres, Boulevards, along Corridors and within Major Transit Station Areas.</p> <p>.b Promoting a variety of built form in Corridors and Boulevards. Development in these areas will respond to the existing and planned built form context in Neighbourhoods, subject to the transition, form and design policies of this Plan.</p>



<p>.c 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.</p>	<p>.c Promoting <u>gentle appropriate</u> intensification in Neighbourhoods <u>located outside of the Urban Growth Centre, Centres, Major Transit Station Areas and Corridors</u>. 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.</p>
<p>2.1.30 - To optimize the use of land in Brampton, a significant portion of growth will be directed to Centres and Boulevards. Table 2 establishes the minimum density targets for each Centre which includes the city's Urban Growth Centre, and other nodes and corridors identified in the Region of Peel Official Plan.</p>	<p>2.1.30 - To optimize the use of land in Brampton, a significant portion of growth will be directed to <u>the Urban Growth Centre</u>, Centres and Boulevards. Table 2 establishes the minimum density targets for each Centre <u>which includes and</u> the city's Urban Growth Centre, and other nodes and corridors identified in the Region of Peel Official Plan. <u>The city's Urban Growth Centre will be planned to achieve, by 2031 or earlier, a minimum density of 200 residents and jobs combined per hectare.</u></p>
<p>Table 2</p>	<p>Add is in the first row of Table 2 the following:</p> <p><u>Location (Schedule 2): Urban Growth Centre</u></p> <p><u>Classification: Urban Growth Centre</u></p> <p><u>Minimum Density Target (Persons and Jobs Per Hectare): 200</u></p> <p><u>Additional Policy Area (Schedule 4): Primary Major Transit Station Area</u></p>
<p>Table 3</p> <p>Primary Major Transit Station Area (Schedule 2): Kennedy</p> <p>Rapid Transit Corridor: Queen St. BRT</p> <p>Minimum Density Target (Persons and Jobs Per Hectare): 160</p> <p>Additional Policy Area: Primary Urban Boulevard</p> <p>2.1.33 - Each Major Transit Station Area is unique with its own growth potential. The City will study Major Transit Station Areas in accordance with the implementation policies of Chapter 3 of this Plan based on local context and conditions to facilitate intensification.</p>	<p>Table 3</p> <p>Primary Major Transit Station Area (Schedule 2): Kennedy</p> <p>Rapid Transit Corridor: Queen St. BRT</p> <p>Minimum Density Target (Persons and Jobs Per Hectare): 160</p> <p>Additional Policy Area: <u>Urban Growth Centre, Urban Centre</u>, Primary Urban Boulevard</p> <p>2.1.33 - Each Major Transit Station Area is unique with its own growth potential. The City will study Major Transit Station Areas in accordance with the implementation policies of Chapter 3 of this Plan based on local context and conditions to facilitate intensification.</p>



<p><i>.a Where a Major Transit Station Area is also within a Centre, the density and height policies governing Centres will prevail.</i></p> <p><i>.b Where Employment Areas are within or overlap with a Major Transit Station Area, the City will initiate a study, in accordance with the Region of Peel Official Plan and Part 2.2 of Brampton Plan, to support the integration of specific portions Employment Areas with non-employment uses to develop vibrant, mixed-use areas, and innovation hubs.</i></p> <p><i>.c 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.</i></p>	<p><i>.a Where a Major Transit Station Area is also within a Centre <u>or Urban Growth Centre</u>, the density and height policies governing Centres <u>and/or Urban Growth Centre</u> will prevail.</i></p> <p><i>.b Where Employment Areas are within or overlap with a Major Transit Station Area, the City will initiate a study, in accordance with the Region of Peel Official Plan and Part 2.2 of Brampton Plan, to support the integration of specific portions Employment Areas with non-employment uses to develop vibrant, mixed-use areas, and innovation hubs.</i></p> <p><i>.c 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 <u>encourages</u> 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.</i></p>
<p>2.1.49 - Where a Secondary Plan does not yet identify the location of Precincts, Precinct Plans will be required with the submission of any Draft Plan of Subdivision and/or significant Zoning By-law Amendment application within Centres, Boulevards, and with frontage onto Corridors to the satisfaction of the City and Region of Peel before approval of the application, in accordance with the policies of Part 2.2 and Chapter 3.</p>	<p>2.1.49 – Where a Secondary Plan does not yet identify the location of Precincts, Precinct Plans will be required with the submission of any Draft Plan of Subdivision and/or significant Zoning By-law Amendment application within Centres, Boulevards, and with frontage onto Corridors to the satisfaction of the City and Region of Peel before approval of the application, in accordance with the policies of Part 2.2 and Chapter 3.</p>
<p>Table 4 <i>Designation: Mixed Use District</i></p> <ul style="list-style-type: none"> <i>Building Typology: Low-Rise</i> <i>Additional Permissions: Major Transit Station Studies may identify appropriate locations for Low-Rise Plus, Mid-Rise and Tall buildings</i> <p><i>Overlay: Urban Centre</i></p>	<p>Table 4 <i>Designation: Mixed Use District</i></p> <ul style="list-style-type: none"> <i>Building Typology: Low-Rise, <u>Low-Rise Plus, Mid-Rise, Tall buildings, and Tall Plus buildings.</u></i> <i>Additional Permissions: Major Transit Station Studies may identify appropriate locations for Low-Rise Plus, Mid-Rise and Tall buildings</i>



<ul style="list-style-type: none"> • <i>Building Typology: Low-Rise Plus, Mid-Rise</i> • <i>Additional Permissions: Tall and Tall Plus buildings may be permitted subject to a Precinct Plan study and other applicable policies in this Plan</i> <p><i>Overlay: Primary Urban Boulevard</i></p> <ul style="list-style-type: none"> • <i>Building Typology: Low-Rise Plus, Mid-Rise</i> • <i>Additional Permissions: Tall buildings may be permitted subject to a Precinct Plan and other applicable policies in this Plan, and where located in within an MTSA</i> 	<p><i>Overlay: Urban Centre</i></p> <ul style="list-style-type: none"> • <i>Building Typology: Low-Rise Plus, Mid-Rise, <u>Mid-Rise, Tall buildings, and Tall Plus buildings.</u></i> • <i>Additional Permissions: Tall and Tall Plus buildings may be permitted subject to a Precinct Plan study and other applicable policies in this Plan</i> <p><i>Overlay: Primary Urban Boulevard</i></p> <ul style="list-style-type: none"> • <i>Building Typology: Low-Rise Plus, Mid-Rise, <u>Mid-Rise Plus Tall buildings, and Tall Plus buildings.</u></i> • <i>Additional Permissions: Tall buildings may be permitted subject to a Precinct Plan and other applicable policies in this Plan, and where located in within an MTSA</i>
<p>2.2.3.a - <i>The Urban Centre and Town Centre are conceptual overlays which indicate the City's principal locations for growth, accommodate important regional amenities, and provide for the greatest intensity, form, and scale in Brampton.</i></p>	<p>2.2.3.a - The Urban Centre and Town Centre are conceptual overlays which <u>in addition to the Urban Growth Centre</u> indicate the City's principal locations for growth, accommodate important regional amenities, and provide for the greatest intensity, form, and scale in Brampton.</p>
<p>2.2.30 - <i>New development within Primary and Secondary Urban 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.</i></p>	<p>2.2.30 - New development within Primary and Secondary Urban Boulevards will have regard for the existing character and built form of adjacent Neighbourhoods, <u>where they are located outside of the Urban Growth Centre, Centres and Major Transit Station Areas,</u> and provide transition in accordance with the design policies of this Plan.</p>
<p>2.2.54 - The minimum density for residential and mixed-use development within the Mixed-Use District designation will be the minimum density target established for the corresponding Major Transit Station Area identified in Part 2.1 of Brampton Plan.</p>	<p>2.2.54 - The minimum density for residential and mixed-use development within the Mixed-Use District designation will be the minimum density target established for the corresponding Major Transit Station Area identified in Part 2.1 of Brampton Plan <u>and consider the minimum density target for the Urban Growth Centre.</u></p>



<p>2.3.36 - Tall Buildings and Tall Plus Buildings have three primary components in design – a base or podium; a middle or tower, and a top:...</p> <p>.b The middle or tower should be clearly separate from the podium, through stepbacks and material changes to lighten their appearance. Tower floorplates should be no larger than 800 meters square. A minimum of 25 meters will be provided between towers to allow for privacy, light and sky views. Responsibilities for providing separation distances will be shared equally between owners of all properties where tall buildings are permitted. Maximum separation distances will be achieved through appropriate floorplate sizes and tower orientation.</p>	<p>2.3.36 - Tall Buildings and Tall Plus Buildings have three primary components in design – a base or podium; a middle or tower, and a top:...</p> <p>.b The middle or tower should be clearly separate from the podium, through stepbacks and/or material changes to lighten their appearance. Tower floorplates should be no larger than 800 meters square. A minimum of 25 meters will be provided between towers to allow for privacy, light and sky views, <u>however deviations to the tower separation distance will be considered on a case by case basis without an amendment to this Plan.</u> Responsibilities for providing separation distances will be shared equally between owners of all properties where tall buildings are permitted. Maximum separation distances will be achieved through appropriate floorplate sizes and tower orientation.</p>
<p>2.3.37 - Tall Buildings Plus will only be permitted where they are identified in a City-initiated Secondary Plan and/or Precinct Plan.</p>	<p>2.3.37 – Tall Buildings Plus will only be permitted where they are identified in a City-initiated Secondary Plan and/or Precinct Plan.</p>
<p>2.3.48 - Review for all Design Priority Areas and Tall Building developments by the Urban Design Review Panel is required for compliance with the Brampton Plan and City-Wide Urban Design Guidelines. Creativity and design excellence will be promoted through programs such as urban design awards.</p>	<p>2.3.48 – Review for all Design Priority Areas and Tall Building developments by the Urban Design Review Panel is required for compliance with the Brampton Plan and City-Wide Urban Design Guidelines. Creativity and design excellence will be promoted through programs such as urban design awards.</p>
<p>2.3.257 - Development applications will 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, which: ...</p>	<p>2.3.257 - Development applications will 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, which: ...</p>
<p>3.1.57 - The City may enact Zoning By-laws and approve Site Plan Applications without a Precinct Plan process for uses that the City deems are in the City and the Region's interest, such as a Provincial facilities, Civic Infrastructure, or transit facilities, provided that such proposals meet all applicable policies and legislation, and provided the proposed development:</p> <p>.a Can be supported by existing servicing infrastructure;</p>	<p>3.1.57 - The City may enact Zoning By-laws and approve Site Plan Applications without a Precinct Plan process for uses that the City deems are in the City and the Region's interest, such as a Provincial facilities, Civic Infrastructure, or transit facilities, <u>and significant private development proposals,</u> provided that such proposals meet all applicable policies and legislation, and provided the proposed development:</p> <p>.a Can be supported by existing servicing infrastructure;</p>



<p><i>.b Protects, preserves, enhances and restores natural heritage features;</i></p> <p><i>.c Protects, preserves, enhances and conserves places and/or landscapes of cultural heritage value;</i></p> <p><i>.d Protects for the future right-of-way of Centres and Boulevards and any planned Transit Network facilities;</i></p> <p><i>.e Meets the intent and purpose of the Urban Design Guidelines; and,</i></p> <p><i>.f Implements the policies and directions of the Secondary Plan.</i></p>	<p>.b Protects, preserves, enhances and restores natural heritage features;</p> <p>.c Protects, preserves, enhances and conserves places and/or landscapes of cultural heritage value;</p> <p>.d Protects for the future right-of-way of Centres and Boulevards and any planned Transit Network facilities;</p> <p>.e Meets the intent and purpose of the Urban Design Guidelines; and,</p> <p>.f Implements the policies and directions of the Secondary Plan.</p>
<p>3.1.85 - Planning and development applications will be required to submit a Housing Analysis as a complete application requirement for all rezoning, subdivision and site plan applications to demonstrate implementation of the results of a related Housing Assessment Report; unless such a Housing Assessment Report is not established, in which case a Housing Assessment Report will be required to be included within the proposed development application in lieu of a Housing Analysis.</p>	<p>3.1.85 - Planning and development applications will <u>may</u> be required to submit a Housing Analysis as a complete application requirement for all rezoning, subdivision and site plan applications to demonstrate implementation of the results of a related Housing Assessment Report; unless such a Housing Assessment Report is not established, in which case a Housing Assessment Report will be required to be included within the proposed development application in lieu of a Housing Analysis.</p>
<p>Chapter 4 – Site and Area Specific Policies</p>	<p>New Site and Area Specific Policy Area be included, as follows:</p> <p><u>X.1 - Notwithstanding the policies of this Plan, the redevelopment of the lands municipally known in 2022 as 226 Queen Street East and 10-12 June Avenue, for residential and non-residential uses, may be approved through a site specific amendment to the Queen Street Corridor Secondary Plan and Zoning By-law in advance of any additional Secondary Plan review, and Precinct Plan, Major Transit Station Area Plan and Area Plan.</u></p>