



Principals

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June 3, 2022

GWD File PN 01.837.00
'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
Claireville Holdings Limited
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Claireville Holdings Limited; the Registered Owner of '0' Steeles Avenue 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 Application (PRE-2022-0036) was filed on March 4, 2022. A Pre-Consultation Meeting with Staff was held on April 13, 2022 regarding the proposal to develop the subject site for Industrial/Office/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.

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Comments can be filed on the draft 'new' Official Plan up until the moment that Council approves the document.

On behalf of Claireville Holdings Limited, we offer the following comments, observations and recommendations dealing with the Draft 'new' Official Plan:

1. **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.
2. **Section 2.1.33(e)** requires a ROP Amendment (ROPA) for the 'planned' Major Transit Station Areas (MTSA's) that eventually will become future Primary Major Transit Station Areas. We believe that this is not necessary, nor appropriate on the basis that the inclusion of the 'new' Primary/Planned Major Transit Station Areas can be included as part of a future Region of Peel Official Plan Review; as part of a housekeeping exercise.

One of the 'planned' Major Transit Station Areas is designated at Goreway Drive and Highway 407 (south side of Highway 407, west side of Goreway Drive); consistent with the 'planned' 407 Transitway Station.

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. The wording of **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 Precincts 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.
5. 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.
6. **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. We recommend that the policy be amended accordingly.

7. **Schedule 6** incorrectly identifies/labels the subject site as Enhancement and Linkages Area, and as such places it in conflict with Schedules 2, 4 and 5 which correctly identify the subject site as Employment, Provincially Significant Employment Zone (PSEZ), Parkway Belt West Plan and Planned MTSA. It is important that the Official Plan complies with the policies and schedules of applicable Secondary Plan and the Parkway Belt West Plan. We recommend that **Schedule 6** be amended accordingly.

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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