



Principals

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GWD File PN 21.2962.00
'New' BOP 2022

The Corporation of the City of Brampton
2 Wellington Street West
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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
7927959 Canada Corp.
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to 7927959 Canada Corp.; the Registered Owner of 9610 McLaughlin Road, 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-2022-0076) was filed on May 6, 2022, with the Pre-Consultation Meeting scheduled for June 15, 2022 regarding the proposal to develop the subject site for residential 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 (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 Council approves the document.

On behalf of 7927959 Canada Corp., we offer the following comments, observations and recommendations dealing with the Draft Official Plan which was released on April 26, 2022.

1. **Section 2.1.6** and **Table 4** notes that Neighbourhoods will be planned at a lower density than Centres, Boulevards, and Corridors, while providing a full range and mix of housing

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options. It is recommended that the policy be revised to provide greater flexibility for greater building heights in strategic locations where appropriate, such as along Corridors, Minor/Major Arterials, key intersection locations, etc.

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. 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. 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.
5. It is noted in **Section 2.2.2 b)** that the intensity of development and range of uses that may be permitted in Neighbourhoods varies depending on the street typology that a property fronts onto. This policy is a good example of a policy with flexibility for taller building typologies and increased density in appropriate locations within the Neighbourhood.
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 OPA if refined through a Subwatershed Study, an area-specific Environmental Impact Study/Assessment, or other forms of site/area-specific analysis. The policy should be amended accordingly.
7. **Housing and Social Matters Chapter** (Pages 2-195), **Section 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 by adding to the inventory of available rental units. The very prescriptive policies are 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'.
8. Similarly, **Housing and Social Matters Chapter** (Pages 2-195), **Section 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 provide 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' units 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, 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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