



Principals

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GWD File: 21.2883.00
'New' BOP 2022

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

Attention: Mayor and Members of Council
Peter Fay, City Clerk
Jason Schmidt-Shoukri Commissioner, Planning, Building &
Economic Development

Subject: FORMAL PUBLIC INPUT
Mr. Mario Matteo Silvestro
Mr. Guido D'Alesio
2088205 Ontario Ltd.
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Mr. Mario Matteo Silvestro, Mr. Guido D'Alesio and 2088205 Ontario Ltd., the Registered Owners of the lands municipally known as 22, 24, 26, 28 and 32 John Street, 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).

By way of background, a Pre-Application Consultation Request proposing to re-develop the subject site with a mixed-use apartment building was filed with the City of Brampton on February 25, 2022 (City File: PRE-2022-0035). A Pre-Application Consultation meeting was held by the City Planning & Development Services Department on March 23, 2022 and thereafter a formal written response was issued inclusive of comments from the local School Boards. On May 13, 2022 a formal Amendment Application was filed proposed to re-develop the subject for a 39-storey residential apartment and student residence. The Application is currently undergoing its completeness review. The Statutory Public Meeting is anticipated to be scheduled in the near future.

Preliminary Policy and Zoning Review

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

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The Downtown Brampton Secondary Plan (Area 7) (February 2019 Consolidation) designated the subject site 'Central Area Mixed Use' and 'Office Node'.

Comprehensive Zoning By-law 270-2004; as amended; zones the subject site 'Downtown Commercial – Section 3154 (DC-3154)'.

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*'
- '*Urban Centres*'

Schedule 2 – City-Wide Growth Management

- '*Neighbourhoods*'
- '*Urban Centres*'
- '*Primary Major Transit Station Area*' (Brampton GO)

Schedule 4 – Provincial Plans & Policy Areas

- '*Built-Up Area*'
- '*Urban Growth Centre*'

Schedule 5 – Designations

- '*Mixed-Use Districts*'

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.a** defines Centres as being those areas of Brampton where the highest concentration of growth and mix of uses is planned to occur.
4. **Section 2.1.2.d** states that Neighbourhoods reflect new and existing lower-scale residential, commercial, and institutional areas in the City.
5. **Sections 2.1.3 and 2.1.4** states that the tallest buildings will be directed to Urban Centres. Within Boulevards and within Major Transit Station Areas, taller buildings may be permitted subject to the applicable built form, design, and implementation policies of this Plan. A mix of transit supportive uses will be provided within the Neighbourhoods designation, with higher densities permitted within Major Transit Station Areas.



6. **Section 2.1.33.a** states that where a Major Transit Station Area is also within a Centre, the density and height policies governing Centres will prevail.
7. **Section 2.1.33.c** states that where a City-initiated study of a Major Transit Station Area has not been initiated or approved by way of an amendment to the 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.
8. **Section 2.1.49** states that where a Secondary Plan does not yet identify the location of Precincts, Precinct Plan will be required with the submission of any Draft Plan of Subdivision and/or significant Zoning By-law Amendment Application within Centres.
9. **Section 2.2.2.a** states that that Mixed-Use Districts designation concentrates a diversity of functions, a higher density of development, a greater degree of mixed-uses, and higher level of transit connectivity within a Major Transit Station Area.
10. **Section 2.3.37** states that Tall Buildings Plus will only be permitted where they are identified in a City-initiated Secondary Plan and/or Precinct Plan.
11. **Section 2.3.48** states that 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.
12. According to **Table 4** lands designated Mixed-Use District on **Schedule 5** will comprise of a Low-Rise building typology. Major Transit Station Studies may identify appropriate locations for Low Rise Plus, Mid-Rise, and Tall Buildings. Lands which are located within Town Centres on **Schedule 2** will comprise of a Low-Rise Plus, and Mid-Rise building typology. Tall buildings may be permitted subject to a Precinct Plan and other applicable policies in this Plan, and where located within a MTSA.

Policy Modification

1. **Section 2.1.33.c)** should be modified to encourage the coordination of development applications between applicants. Applicants should not be required to advance a Secondary Plan and/or Precinct Plan at their cost.
2. The majority of lands located within the City's Primary and Planned MTSAs, Centres, and Urban Growth Centre do not currently have Precinct Plans. **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.



3. **Section 2.3.48** should be deleted or modified to state that review for all Design Priority Areas and Tall Building developments by the Urban Design Review Panel is voluntary and not required for compliance with the Brampton Plan and City-Wide Urban Design Guidelines. The City's Design Panel are neither the approval authority, elected municipal officials, or City employees.
4. **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. 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.
5. **Section 2.3.263** speaks to the inclusionary zoning in Major Transit Station Areas to support the development of affordable housing units through a subsequent amendment to the Brampton Plan. Chapter 3, **Sections 3.1.76 to 3.1.76** address its implementation. We recommend that the future amendment specify scenarios where exemptions are permitted including:
 - Site Plan Approval or Building Permit Applications received on or before the date of the passing of the Inclusionary Zoning By-law;
 - Rezoning Applications and associated Plans of Subdivision or Condominiums received on or before the date of adoption of the Inclusionary Zoning Official Plan Amendment; and
 - Student/Staff residences, retirement buildings, hospices, long-term care buildings, and group homes.
6. **Section 3.1.57** addresses circumstances where the City may enact Zoning By-law and approve Site Plan Applications without a Precinct Plan process for uses that the City deems are in the City and Region's interest. The list of uses should be expanded to include significant private development proposals.

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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