

## Public Works

10 Peel Centre Dr.  
Suite A  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

July 15, 2022

City of Brampton  
2 Wellington Street West  
Brampton ON, L6Y 4R2

**Attention: Andrew McNeill, Acting Director, City of Brampton**

**RE: Recommendation Report – Unlimited Height and Density  
Report Number: Planning, Bld & Ec Dev-2022-701**

---

Please accept preliminary comments, herein, from Region of Peel Staff, on the above-noted Recommendation Report, which was prepared by City of Brampton staff as part of a revised response to Resolution PDC090-2021.

Based on our understanding of the City staff direction, we note that the Report is recommending that an Unlimited Height and Density Incentive Program be offered in a small geographic area of the Downtown, adjacent to the GO Station and “*for all of Uptown*” in exchange for a percentage of units above 25 storeys being set aside for affordable housing. This set aside rate for affordable housing units would be determined through the Inclusionary Zoning consultation process, and subsequent staff recommendations to Planning and Development Committee for consideration. City staff are further recommending that the proposed Incentive Program be applied to Downtown and Uptown for a period of five years, after which time, Council can make a decision on whether to extend or cancel or amend the program, and also that a ‘developer deadline’ be applied to encourage program participants to achieve building permit and break ground within three (3) years of site plan approval.

Regional staff are generally supportive of increased heights and densities, as well as programs that incentivize the creation of affordable housing, in Major Transit Station Areas and Strategic Growth Areas where residential and mixed use areas are planned. This direction is in keeping with broad planning principles shared by the Region and the City towards achieving complete communities, properly managing growth, and responding to climate change, etc.

However, the proposal to allow unlimited heights and densities in areas of the Downtown and Uptown present a number of concerns that are of public interest, and that directly relate to the Region’s long-term strategic responsibilities. These responsibilities include planning for the availability of water and wastewater infrastructure in time with the implementation of growth. While the Report speaks to this issue succinctly in its *Infrastructure Planning* section, it is not clear how the proposal addresses and reconciles these concerns. The proposal to scope the unlimited density permissions to certain geographic areas does not provide for the Region to properly plan for the necessary infrastructure. This issue is further impacted by the

## Public Works

10 Peel Centre Dr.  
Suite A  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

proposal to apply this regime to “*all of Uptown*” which is an undefined geographic area that could potentially be extensive.

Furthermore, while Regional staff appreciate the intention of the proposed 3-year ‘developer deadline’ and the sunset clause to discourage speculative re-zonings, inflated land values and exploitative use of *Planning Act* processes, this deadline could create expectations related to the timing of infrastructure delivery that may not be possible to meet in many areas.

In order to implement the proposed Incentive Program, Regional staff note that the City will need to bring forward requests for Local Official Plan Amendment (“LOPA”) and Zoning By-law Amendment (“ZBA”). And with respect to these required implementing LOPAs, it is Regional staff’s understanding that under recent provincial policy changes, the *Planning Act* does not allow the Region to exempt local municipalities from Regional Council approval where land use, height and density are being addressed in Protected MTSAs [*Planning Act*, section 16(19)].

If City Council approves this idea / initiative, Regional staff look forward to working with City staff on the issues it raises through the Regional review exercise. If you have any questions or concerns, please contact me at your earliest convenience at 905-791-7800 ext. 4047, or by email at [adrian.smith@peelregion.ca](mailto:adrian.smith@peelregion.ca).

Yours truly,



Adrian Smith, RPP  
Chief Planner and Director of Planning and Development Services  
Public Works , Region of Peel

cc. Peter Fay, City Clerk, Legislative Services, City of Brampton  
Jason Schmidt-Shoukri, Commissioner, Planning Building and Economic Development,  
City of Brampton  
Kealy Dedman, Commissioner, Public Works, Region of Peel  
Elvis Oliveira, Director , Water & Wastewater Infrastructure Planning, Region of Peel