



Principals

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GWD File PN 22.3206.00
MTSA

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
Steve Ganesh, Commissioner, Planning, Building and Growth
Management
Michelle Gervais, Policy Planner, City Planning and Design
Claudia LaRota, Supervisor/Principal Planner, City Planning and
Design

Subject: Public Input – Statutory Public Meeting
City-Initiated Official Plan Amendment
Major Transit Station Areas
Starbank Development Corporation

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Starbank Development Corporation (Client); the Registered Owner of 285 and 289 Queen Street 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 in connection with the Information Report and Statutory Public Meeting regarding City-Initiated Official Plan Amendment – Major Transit Station Areas (MTSA). The subject site is located in the Rutherford ‘Primary’ MTSA.

City-Initiated Official Plan Amendment - MTSA

According to the City of Brampton Staff Report, the purpose of the City-Initiated Official Plan Amendment – Major Transit Station Areas is to propose the addition of interim Official Plan policies to better guide development and land use decisions in MTSA’s, while the detailed planning and technical studies for Primary MTSA’s are completed and until Brampton Plan (the ‘New’ Brampton Official Plan) is in effect. The OPA includes: a new schedule showing the boundaries of Primary MTSA’s and the locations of Planned MTSA’s; interim set of policies to support intensification and to guide development; and deletes the Mobility Hub policies, schedules and references.

The City of Brampton has scheduled the Statutory Public Meeting to receive public comments on the draft City-Initiated Interim MTSA Policies Official Plan Amendment on Monday, February 13, 2023.

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On behalf of Starbank Development Corporation, we have reviewed the City of Brampton Staff Report dated January 10, 2023, along with the accompanying Draft Official Plan Amendment, and offer the following comments, observations and recommendations.

1. **Section 3.1 (6)** of the draft OPA includes the proposed text for the new **Section 3.2.4 – Major Transit Station Areas**. More specifically, the third introductory paragraph under proposed Official Plan **Section 3.2.4** directs that “...a variety of housing option that include a mix of affordable rental and ownership housing types and unit sizes shall be provided” in terms of addressing affordable housing objectives. We recommend that the policy be revised to use progressive language such as ‘encourage’ and ‘strive to provide’, as opposed to being prescriptive. Without financial support and affordable housing development initiative/investment from all levels of government, these targets, may not be achievable.
2. Continuing with **Section 3.1(6)**, and the fourth introductory paragraph under proposed Official Plan **Section 3.2.4**, the last sentence appears to contradict the rest of the paragraph. In this regard, the paragraph notes that the transportation network for MTSA’s will be designed to support and integrate active transportation, local transit services and inter-municipal/inter-regional higher order transit services. These transit services are motorized modes of transportation. The last sentence is contradictory as it notes that non-motorized travel will be the preferred option within MTSA’s. We recommend that this sentence be re-worded to reflect the objective of walkable communities, that are transit-supportive.
3. **Section 3.1 (6)** of the draft Official Plan Amendment, and more specifically proposed Official Plan **Section 3.2.5.1**, it is not clear if the objectives of this policy are meant to be met across the whole of the MTSA, or within each development application within an -identified MTSA. The introductory statement notes “All development within an MTSA...” In particular, subsection f) speaks to providing a diverse, equitable and inclusive set of public service facilities and community services. It may not be feasible for each application, depending on the size of the property, location, or existing neighbourhood characteristics (i.e. industrial/employment areas, predominantly urban built forms, etc.) to provide this. We recommend that the policy be amended to reflect that these objectives are to be achieved across the whole of the MTSA.
4. General Comment – **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically proposed Official Plan **Section 3.2.5.2** – is the study referenced here the current MTSA Study that is ongoing by the City of Brampton, or is this a separate development application-based study to be completed by development proponents when applications are submitted?
5. **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically proposed Official Plan **Section 3.2.5.2 b)** speaks to building heights and FSI. The policy makes a reference to maximum heights if required. We recommend that the policy be amended to only reference the minimum heights. The subject site, along with other MTSA locations, are located in an area of the City that is subject to the recently adopted Council resolution on unlimited height and density.



6. General Comment – **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically proposed Official Plan **Section 3.2.6** – is the MTSA Block Concept Plan referenced in this proposed policy the same as a Tertiary Plan?
7. **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically, proposed Official Plan **Section 3.2.6.4**, we applaud the policy “encouraging” owners within an area to work together to produce the Block Concept Plan. However, the policy then goes on to note an individual owner may complete the Plan for the entire area if others decide not to participate. The policy does not reflect situations where other owners may not necessarily “decide not to participate”, but rather the owner proceeding to prepare the plan may not be aware of other owners who are in the process of preparing an application. The Policy also does not reflect whether this plan is one that gets revised from time-to-time as successive applications are brought forward. We recommend that this policy be deleted in its entirety.
8. General Comment – **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically proposed Official Plan **Section 3.2.6.5 g)** – is the phasing of development referred to in this policy within each site-specific development, or across the whole of the MTSA? There are instances, depending on the size and extent of the development proposed where phasing could occur in both instances.
9. **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically, proposed Official Plan **Section 3.2.7.1**, speaks to the preparation of a Growth Management Strategy. It would appear, but is not clear in the policy, that this is similar to the Growth Management Staging and Sequencing Reports prepared in the Block Plan process. Confirmation and clarification is required, and should be worked into the proposed policy. It is not clear in the proposed policy who prepares this report (the first application in the MTSA, each application (i.e. updating the original report)), or the mechanism to ensure coordination where applicants may not be aware that others are planning/proceeding to file site-specific applications.
10. **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically, proposed Official Plan **Section 3.2.7.3**, should include less prescriptive language such as “encourage” or “explore”. In some cases, there may be constraints to consolidation of parcels (owners not prepared to sell, varying lengths of commercial leases, etc.) that would preclude this from occurring. Official Plan policy should not mandate the requirement of a property owner to purchase other properties, and conversely, to sell properties. There are policies in place to require applicants to demonstrate conformity with various policy objectives, along with demonstrating that proposed developments do not preclude the overall objectives of the MTSA. These are sufficient, and we recommend that this policy be deleted in its entirety.
11. **Section 3.1(6)** of the draft Official Plan Amendment, and more specifically, proposed Official Plan **Section 3.2.8**, is a policy section specifically related to Planned MTSA’s, and speaks to the nature of these areas requiring further study to determine appropriate land use considerations before they are delineated.



Proposed Official Plan **Sections 3.2.4 through 3.2.7** provide interim policies for MTSA locations, that appear to refer to the Primary or Secondary MTSA's; those that are delineated, however, those policies are not under a specific section heading that identifies those policies as being specific to the delineated MTSA's. In addition, they include generic references to "development in a MTSA", which would include Planned MTSA's; this would appear to conflict with the Planned MTSA section (Section 3.2.8). We recommend that the previously noted proposed sections be placed under an appropriate heading to reflect the MTSA's that the policies apply to.

12. The draft Official Plan Amendment to introduce Interim MTSA Policies is premature, given that the MTSA study is ongoing, and a number of the Focus Group Sessions for the Primary MTSA's are either occurring after the Public Meeting (Mount Pleasant MTSA on February 16, 2023), or have yet to be scheduled (Bramalea GO, Brampton GO, Centre, Kennedy and Rutherford). These reflect a large number of Primary MTSA locations where the greatest heights and densities are expected to be accommodated, including the MTSA within which the subject site is located (Rutherford MTSA). We recommend any decision on this draft City-Initiated OPA be deferred until after input is received from all of the Focus Group Meetings for all of the MTSA locations.

Closing Remarks

Thank you for the opportunity to provide comments on the Draft City-Initiated Official Plan Amendment – Major Transit Station Areas. Our Client reserves the right to provide further comments as necessary prior to Council approval of the Official Plan Amendment.

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 City-Initiated Official Plan Amendment – Major Transit Station Areas. Lastly, we request notification of the passage of any and all By-laws and/or Notices on this matter.

Should you have any questions, please contact the undersigned.

Yours truly,

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner and Principal Planner

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Partner and Managing Principal Planner

cc: **Starbank Development Corporation**
Anthony Sirianni, Gagnon Walker Domes Ltd.
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