



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

May 15, 2023

GWD File: PN 3155

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

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: Additional Public Input
May 15, 2023 Planning & Development Committee
Item 7.3 - City-Initiated Official Plan Amendment Major Transit Station
Areas (City-Wide)
Part of Lot 14, Registered Plan 347 in the City of Brampton
Hillside To Properties Inc.

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to the Hillside To Properties Inc. (Client) for the property legally known as Part of Lot 14, Registered Plan 347 in the City of Brampton (subject site). The subject site is located at the southwest corner of Steeles Avenue West and Lancashire Lane in the City of Brampton and is located in the Gateway Terminal 'Primary' Major Transit Station Area (MTSA) pursuant to the new Region of Peel Official Plan and within a Mobility Hub Gateway pursuant to the current, in-force City of Brampton Official Plan.

Our Client has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included our Client's participation in the Gateway Terminal MTSA Focus Group Session that was hosted by City Staff on February 8, 2023, and through formal written correspondence prepared by GWD on behalf of our Client to the City of Brampton dated April 24, 2023 (attached). GWD's previous written correspondence outlined our Client's concerns regarding the draft City-Initiated Official Plan Amendment pertaining to City-wide MTSA's (MTSA OPA).

GWD has reviewed the revised MTSA OPA included in the City of Brampton's Supplementary Recommendation Report in connection with the draft MTSA OPA dated April 28, 2023. While City Staff have included some modifications to the draft MTSA OPA, the modified draft MTSA OPA fails to address our Client's concerns.

GAGNON WALKER DOMES LTD.

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W 0B4 • P: 905-796-5790
www.gwdplanners.com • Toll Free: 1-855-771-7266

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Closing Remarks

We reserve the right to provide further comments prior to Regional Council approval of the MTSA OPA. 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,

**for Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Managing Principal Planner**

**Richard Domes, B.A., C.P.T
Principal Planner**

**cc: Hillside To Properties Inc.
N. Dawan, Gagnon Walker Domes Ltd.**



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April 24, 2023

GWD File: PN 3155

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

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 – April 24, 2023 Planning & Development Committee
Item 7.2 - City-Initiated Official Plan Amendment
Major Transit Station Areas (City-Wide)
Part of Lot 14, Registered Plan 347 in the City of Brampton –
Hillside To Properties Inc.

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to the Hillside To Properties Inc. (Client) for the property legally known as Part of Lot 14, Registered Plan 347 in the City of Brampton (subject site). The subject site is located at the southwest corner of Steeles Avenue West and Lancashire Lane in the City of Brampton and is located in the Gateway Terminal 'Primary' Major Transit Station Area (MTSA) pursuant to the new Region of Peel Official Plan and within a Mobility Hub Gateway pursuant to the current, in-force City of Brampton Official Plan.

Our client is in the process of preparing formal plans for the phased redevelopment of subject site for a mixed use, transit-oriented development.

City-Initiated Official Plan Amendment - MTSA

On behalf of our Client, we have reviewed the City of Brampton Staff Recommendation Report dated March 8, 2023, along with the accompanying revised draft Official Plan Amendment (MTSA OPA). Based on our detailed review of the draft MTSA OPA, we offer the following comments, observations and recommendations.

- 1. Deletion of Mobility Hub Gateway** – The Mobility Hub Gateway in the City's Official Plan is intended to accommodate a concentration of higher intensity uses but at higher levels than the City's MTSA's. The proposed deletion of the Mobility

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Hub Gateway and all associated policy references from the City's Official Plan would remove this fundamental planning policy framework and reduce the role and function of the Mobility Hub Gateway within the City Structure. On this basis, our Client does not support the removal of the Mobility Hub Gateway centred around the intersection of Hurontario Street and Steeles Avenue.

2. **Policy 3.2.4.1** - Policy 3.2.4.1 of the draft MTSA OPA directs that "...a *minimum number of residents and jobs will be applied.*" However, the following sentence of this Policy then references that "*The minimum number of residents and jobs combined per hectare...outlined in Table 1...*". In the first sentence of this Policy, this would represent a total number of residents and jobs, while the second sentence of this Policy and Table 1 are density targets that are calculated across the whole of the MTSA. We recommend that the first sentence of Policy 3.2.4.1 be amended, for clarity to read: "... a *minimum density target of residents and jobs per hectare will be applied.*"
3. **Policy 3.2.5.1** – It is unclear if the objectives of this policy are meant to be met across the whole of the MTSA, or within each development application that is made within the MTSA. We recommend that language be added to the policy that clarifies that these objectives are to be achieved across the whole of the MTSA, rather than for each site specific development application.
4. **Policy 3.2.5.1 b)** – The objective for transitioning to lower density established neighbourhoods is generally supportable, however, the reference to '*properties that do not have frontage along existing or planned higher order transit corridors*' should be removed. There are areas in the "Primary" MTSA's, including the subject site, where there are properties that do not, or will not, have frontage along existing or planned higher transit corridors that do not necessarily require transition to lower heights. The Policy should simply remove this portion of the draft Policy and simply direct that proposed development achieve the appropriate transitions, which shall be determined in a site-by-site basis.
5. **Policies 3.2.5.2 b) and c)** – While the revised draft MTSA OPA replaced the words "if required" to "if appropriate" in regards to maximum building heights and maximum FSI within draft Policies 3.2.5.2 b) and c) respectively, we are of the understanding that the Minister of Municipal Affairs and Housing (through his letter to the Region of Peel, dated February 9, 2023) affirmed that it is deemed contrary to Region of Peel Official Plan policy (particularly Policy 5.6.19.10e, which was specifically modified by the Minister prior to his final approval) for any lower-tier municipality within the Region of Peel to impose maximum building heights within MTSA's. In this regard, we recommend that Policies 3.2.5.2 b) and c) be amended to only direct that MTSA-specific land use policy identify minimum building heights and densities.
6. **Policy 3.2.6.3** – The proposed requirement for the submission of one (1) joint Tertiary Plan to be approved prior to allowing development applications to proceed within an MTSA does not recognize that different landowners may be at different stages of the development application process. This policy language, as currently



drafted, has the potential to unreasonably “hold up” development applications that might otherwise be able to proceed to fulfill overall growth objectives. We recommend that the last sentence of draft Policy 3.2.6.3 be deleted in its entirety.

7. **Section 3.2.7** – As a general comment, the introductory language of this Section should more clearly identify that these objectives are to be achieved across the whole of the MTSA, rather than for each site specific development application.
8. **Policies 3.2.7.1 and 3.2.7.2** – These Policies speak to the responsibility of the applicant to prepare a Growth Management and/or Servicing Strategy to assess the timing and delivery of servicing infrastructure. These Policies do not reflect that in most cases, this requires assessment or recommendation/implementation of servicing upgrades across lands that are not within the applicant’s control, as well as the timing of improvements that are not within the applicant’s control (i.e., City and Regional Capital Works Program changes, etc.).

Further, Policy 3.2.7.1 requires that a Growth Management Strategy be included as a section in a Planning Justification Report, which meets the established City Terms of Reference, and is satisfactory to the City and Region prior to a development application being deemed complete. It is inappropriate to require the Growth Management Strategy to be to the satisfaction of the City and Region prior to the development application being deemed complete. This Policy should only require that the Growth Management Strategy be deemed to have met the requirements of the established City Terms of Reference prior to deeming it complete, and thereafter, through the processing of the development application and the technical review, will the Growth Management Strategy be approved to the satisfaction of the City and Region.

Closing Remarks

Thank you for the opportunity to provide comments on the draft City-Initiated Official Plan Amendment – Major Transit Station Areas. We reserve the right to provide further comments as necessary prior to Regional Council approval of the MTSA OPA. 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,


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