



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

October 23, 2023

GWD File: PN.21.2678.00

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

Attention: Steve Ganesh, Commissioner, Planning, Building and Growth Management
Henrik Zbogor, Director, City Planning & Design
Shannon Brooks-Gupta, Principal Planner, City Planning & Design

Subject: Public Input – Letter of Concern
Final Draft – Proposed ‘Brampton Plan’
3407 Countryside Drive – Surinder Malhi

Gagnon Walker Domes Ltd. (“GWD”) acts as Planning Consultant to Surinder Malhi; the Registered Owner of 3407 Countryside Drive in the City of Brampton (hereinafter referred to as the “subject site”). The subject site is located on the south side of Countryside Drive, west of Goreway Drive.

A Pre-Application Consultation meeting (City File: PRE-2020-0173) was held with the City of Brampton Planning & Development Services Department on February 10, 2021 regarding the proposed redevelopment of the subject site. A formal Amendment Application was filed with the City of Brampton in September 2023, in connection with the proposed re-development of the subject site for a 12-storey mixed-use residential/retail building.

Our has been actively engaged in the City of Brampton’s Official Plan Review process. This has included, but is not limited to formal written correspondence prepared by GWD on behalf of our Client to the City’s Planning and Development Committee dated June 3, 2022 (a copy of prior written correspondence to the City of Brampton is attached to this letter in **Appendix 1**).

We write to express our Client’s continued concerns regarding the potential implications of the final draft of the new proposed City of Brampton Official Plan (“Draft Brampton Plan”) policies on the subject site.

OVERVIEW of DRAFT BRAMPTON PLAN LAND USE DESIGNATIONS

The following are key designations and overlays of the Draft Brampton Plan that are proposed to apply to the subject site:

- Schedule 1 - City Structure:
 - ‘Support Corridor’ (Countryside Drive);
 - ‘Community Areas’.

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7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W 0B4 • P: 905-796-5790
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- Schedule 2 - Designations:
 - *'Neighbourhoods';*

ADDITIONAL CONCERNS REGARDING FINAL DRAFT BRAMPTON PLAN

GWD has reviewed the final Draft Brampton Plan on behalf of our Client. The concerns raised in previous correspondence (**Appendix 1**), continue to be raised through this submission to the City of Brampton. In addition, our Client has the following additional concerns as highlighted below:

- General overall comment – in many instances throughout the policy document, references to the Region of Peel have been deleted to reflect the upcoming dissolution of the Region of Peel. However, there are also instances where the reference to the Region of Peel has been left in, including in some cases requirements to seek a Regional Official Plan Amendment. We recommend that the Official Plan be revised to be consistent in referring to the Region of Peel.
- General overall comment – similar to the note above, in many policies through the Final Brampton Plan, references to the Natural Heritage System have been amended to remove the word 'Heritage'; however, there are many instances throughout the Final Brampton Plan, including on the Schedules thereto, where reference is made to the 'Natural Heritage System'. We recommend that the Official Plan be revised to be consistent in referring to the Natural Heritage System.
- General overall comment – in various policies (such as 2.2.3.11 j)), the policy language summarizes various performance standards that are to be regulated through a Zoning By-Law, including among others, materials. A Zoning By-Law is not permitted to regulate things like materials and colours. Recommend that the Official Plan be revised to remove reference to materials.
- Policy 2.1.2.7 refers to all development in conformity with the City-Wide Growth Management Framework, however, there is no section in the Final Brampton Plan under this heading, and no schedule includes this as a designation. It is not clear what this is referring to. We recommend that Staff clarify the intent of this policy.
- Previous comments on Policies 2.1.2.13 and 2.1.2.14 (previously 2.1.16 in earlier drafts of Brampton Plan) with regard to amending the word 'minimum' to 'target' have been made. However, Table 1 still refers to the growth forecasts as "minimum". We recommend that the title of Table 1 be amended to conform with the language of the policies.
- The wording of Policy 2.1.2.84 is not clear on how the limits of a Precinct Plan will be determined in the instances noted therein (i.e. where a Secondary Plan does not yet identify the location of Precincts).
- Within Policy 3.1.2 – Complete Communities is the heading 'Community Hubs'. The policy describes Community Hubs as being, among others, "future-proof" public spaces. What is "future-proof"? In addition, "Community Hubs" are not identified on any Official Plan Schedule – where are they located, and when would these policies apply. We request that staff provide clarification to this policy.
- Policy 3.2.6.2 speaks to requiring 'Adaptation Checklist' for all planning and development activities to expected regional climate impacts. It is not clear what 'Adaptation Checklist'



means and how does each planning and development activity supposed to understand or know the expected regional climate impacts. This policy is too vague and not clear in what is intended. We recommend that the policy either be revised to clarify what is intended or to delete the policy.

- Part 3.3 and more specifically, Policy 3.3.1.2 speaks to housing targets. While it is recognized that affordable housing, housing mix and rental housing are targets, to state that the City working with other levels of government will 'work to achieve' these targets is very onerous and not reflective of changing market conditions. We recommend that the policy be amended to provide flexibility in how these targets are achieved.

Furthermore, it is our opinion that the housing targets are very optimistic and untenable. It is very difficult to achieve these targets given the current and anticipated future market conditions. We strongly recommend that these targets be reconsidered to reflect the reality of the market conditions and effective implementation. Without financial support and affordable housing development initiatives/investments from all levels of government, these targets, if maintained as is, are not achievable.

Closing Remarks

We understand that the Final Draft of Brampton Plan was released the week of September 18, 2023 for public review and comment. We note that while our office has been actively monitoring the Brampton Plan process and previously provided public input into this exercise, neither GWD nor our Client were immediately informed by the City that the Final Draft had been released at that time.

Further, we understand that certain critical Draft Brampton Plan Schedules which are intended to form part of Brampton Plan have not yet been released or included for public consultation. Notwithstanding, the City had requested that all public input on the Draft (as partially released) be received by October 2, 2023 in order to be considered as part of an upcoming final Staff Recommendation Report.

Respectfully, this commenting period of a mere two (2) weeks is inadequate given the magnitude and broadness of the scope of the planning exercise as it pertains not only to our Client, but also all other landowners and other stakeholders in the City of Brampton.

As noted above, we understand that the City's Planning Department intends to table a final Recommendation Report to Planning and Development Committee on October 23, 2023, that recommends that City Council adopt the Draft Brampton Plan at the November 1, 2023 Council Meeting. The aforementioned Recommendation Report, which was made available on October 16, 2023, provides the schedules omitted as noted above, which provides only one (1) week to comment; this too is an inadequate commenting period.

In the spirit of meaningful and appropriate consultation, we believe that City Planning Staff should extend the commenting period until November 2023 and defer the consideration of a final Recommendation Report thereto.

Thank you for the opportunity to provide public input. While our Client wishes to express its general support, they do have reservations and may provide further comments as necessary during the process.



Yours truly,

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

cc: Surinder Malhi
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.



APPENDIX #1



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

June 3, 2022

GWD File PN 19.2678.00
'New' BOP 2022

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
Jason Schmidt-Shoukri, Commissioner, Planning, Building and
Economic Development

Subject: Public Input
Surinder Malhi
Draft Brampton Plan (Official Plan)

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Surinder Malhi; the Registered Owner of 3407 Countryside Drive, 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).

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 Surinder Malhi, we offer the following comments, observations and recommendations dealing with the Draft 'new' Official Plan:

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 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.

GAGNON WALKER DOMES LTD.

21 Queen Street East, Suite 500 • Brampton ON Canada L6W 3P1 • P: 905-796-5790
3601 Highway 7 East, Suite 310 • Markham ON Canada L3R 0M3 • P: 905-477-6556
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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** (Page 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 adding to the inventory of available rental units. The very prescriptive policies as 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** (Page 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' 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,

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

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

cc: Adrian Smith, Region of Peel
Andrew McNeill, City of Brampton
Surinder Malhi, 3407 Countryside Drive, Brampton
Nitesh Gupta, 3407 Countryside Drive, Brampton
Ranjit Dhaliwal, 3407 Countryside Drive, Brampton
Marc De Nardis, Gagnon Walker Domes Ltd.
Richard Domes, Gagnon Walker Domes Ltd.