

Appendix 8 – Summary of Public, Stakeholder and Agency Comments

Contents

2.0 Context of the 2006 Official Plan.....2

3.0 Sustainable City Concept and 4.1 Residential4

X Central Area and Urban Growth Centre28

4.2 Commercial.....32

4.3 Employment33

4.4 Transportation.....38

4.5 Natural Heritage and Environmental Management.....45

4.7 Infrastructure and Utilities49

5.0 Implementation.....49

Schedules.....50

General Comments.....53

Summary of Public, Stakeholder and Agency Comments

2.0 Context of the 2006 Official Plan

#	Section	Comment	Staff Response
Townsend and Associates – For Solmar Development Corporation – October 1, 2009			
1.		<p>The population and housing units in the draft Brampton Official Plan Amendment require adjustment to:</p> <ul style="list-style-type: none"> • More appropriately reflect the growth in the Region anticipated to 2021 vs. 2031 • Recognize the need for low density ground oriented housing supply in Caledon • Recognize artificial supply constraints in Caledon. <p>All policies in the draft Official Plan Amendment that have the effect of limiting low density, ground oriented housing supply in Caledon over the short and longer term be revisited to allow for an appropriate range and mix throughout the Region.</p>	<p>The Region of Peel has worked with the City of Brampton, the City of Mississauga and the Town of Caledon on regional population, housing and employment forecasts to ensure Growth Plan compliance and an appropriate housing mix and distribution throughout the Region. The Town of Caledon Official Plan will address the distribution of growth in Caledon.</p>
Gagnon Law - For the North West Brampton Landowners Group – October 5, 2009			
2.		<p>We would like to understand what portion of the 2031 population, household and employment forecasts are being assigned to North West Brampton. There is an obvious relationship between this and the amount of development envisaged to take place elsewhere in the City. The report indicates that the forecasts include a focus on intensification with approximately 57,300 new housing units being accommodated within the Built Boundary to 2031. The number of 57,300 sounds ambitious. An indication of how this number was derived would help. In addition, the 18,000 new residents and 10,000 new employees within the UGC sounds ambitious. Please indicate how these figures relate to projections for the Greenfield areas of the City and the population and employment figures with the NWBLG advanced through the joint GLB/IBI report.</p>	<p>The staff report erroneously expressed 57,300 as the number of ‘new’ housing units forecast within the built boundary between 2015 and 2031 whereas this number represents the <u>total</u> housing units being accommodated within the Built Boundary to 2031.</p> <p>Population and employment forecasts are based on work done through the Growth Plan studies. Detailed secondary planning will further distribute the City-wide forecast to appropriate locations.</p>
3.		<p>We concur with the suggestion that further changes to the forecasts may be necessary to reflect the outcome of the Financial and Municipal Management Review, and the Market Demand and Development Feasibility Study, plus conformity to ROPA 24.</p>	<p>City of Brampton Council reaffirmed their support for Hemson’s population and employment forecasts for Brampton at the February 10th 2010 Council Meeting. ROPA 24 has since been adopted by Regional Council, which includes the local population and employment</p>

#	Section	Comment	Staff Response
			forecasts.
4.		It is premature for any of the member municipalities in Peel to adopt population and employment forecasts, as well as Growth Plan Conformity amendments in the absence of the Region of Peel adopting their own amendment.	The Region of Peel Official Plan Amendment (ROPA) 24 was approved by Regional Council on April 22, 2010.
5.	2.4.2	<p>We are unable to ascertain what is meant by or how you intend to implement the objective in Section 2.4.2 which seeks to direct a portion of new residential development annually to within the built up area.</p> <p>We also do not understand what is meant in this section by the direction of a significant amount of housing and employment growth; how does one define significant? The term “<i>significant</i>” is very subjective. We would recommend that this policy be revised to “<i>encourage</i>” that which you seek to accomplish in relation to the Growth Plan on both a City and Regional basis</p>	<p>The Growth Plan sets out certain regional targets, including an intensification target. ROPA 24 includes a target number of intensification units for each area municipality and the City will allocate the growth to ensure the policies of the Growth Plan are achieved.</p> <p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.</p>
Gagnon Law – For Royalcliff Developments Inc. – October 5, 2009			
6.	2.4.2	<p>We are unable to ascertain what is meant by, or how you intend to implement the objectives which seek to direct a portion of new residential development annually to within the built-up area.</p> <p>We also do not understand what is meant in this section by the direction of a significant amount of housing and employment growth; how does one define <i>significant</i>?</p>	<p>The Growth Plan sets out certain regional targets, including an intensification target. ROPA 24 includes a target number of intensification units for each area municipality and the City will allocate the growth to ensure the policies of the Growth Plan are achieved.</p> <p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.</p>
Gagnon Law – For RG’s Group Inc. - October 5, 2009			
7.	2.4.2	<p>We are unable to ascertain what is meant by, or how you intend to implement the objectives which seek to direct a portion of new residential development annually to within the built-up area.</p> <p>We also do not understand what is meant in this section by the direction of a significant amount of housing and employment growth; how does one define <i>significant</i>?</p>	<p>The Growth Plan sets out certain regional targets, including an intensification target. ROPA 24 includes a target number of intensification units for each area municipality and the City will allocate the growth to ensure the policies of the Growth Plan are achieved.</p> <p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.</p>

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Gagnon Law – For Medallion Properties Inc. – October 5, 2009			
8.	2.4.2	<p>We are unable to ascertain what is meant by, or how you intend to implement the objectives which seek to direct a portion of new residential development annually to within the built-up area.</p> <p>We also do not understand what is meant in this section by the direction of a significant amount of housing and employment growth; how does one define <i>significant</i>?</p>	<p>The Growth Plan sets out certain regional targets, including an intensification target. ROPA 24 includes a target number of intensification units for each area municipality and the City will allocate the growth to ensure the policies of the Growth Plan are achieved.</p> <p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.</p>
Gagnon Law – For 2077060 Ontario Inc. (Saberwood Homes) – October 5, 2009			
9.	2.4.2	<p>We are unable to ascertain what is meant by, or how you intend to implement the objectives which seek to direct a portion of new residential development annually to within the built-up area.</p> <p>We also do not understand what is meant in this section by the direction of a significant amount of housing and employment growth; how does one define <i>significant</i>?</p>	<p>The Growth Plan sets out certain regional targets, including an intensification target. ROPA 24 includes a target number of intensification units for each area municipality and the City will allocate the growth to ensure the policies of the Growth Plan are achieved.</p> <p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.</p>

3.0 Sustainable City Concept and 4.1 Residential

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Glen Schnarr And Associates Inc. for Metropole Homes Ltd – April 28 2009, RE: Inventory & Assessment of Int. Opp., Hemson, 2008			
10.	(3.2)	<p>Planning Consultant for Metropole Homes Ltd, who owns approx 2.5 acres at the NW quadrant of Mavis Road and Hwy 407 within the BW Secondary Plan area. In the process of advancing the application to the City to amend the City's Official Plan and Zoning By-law to obtain approval for a 24-storey apartment building and a mix of townhouses and villas accommodating 294 residential dwelling units. The subject site is within the City's built up area and qualifies for the City's review of intensification opportunities.</p> <p>Map 7 of the Hemson report highlights the subject lands for Potential Intensification Opportunities. We concur with the findings of the</p>	<p>While staff acknowledges the site may be appropriate for some level of residential intensification, the current proposal does not satisfy all of the criteria within proposed policy 3.2.7.4 and may contravene the City structure policies.</p> <p>See detailed discussion in staff report.</p>

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		<p>Hemson report that the subject site represents “<i>a significant and appropriate opportunities for intensification</i>”. While the proposed FSI of 3.0 may seem high from a numerical perspective, we are of the opinion that the proposal to blend the proposed density with a combination of well-designed and well-sited medium and high-density uses would be suitable on the subject site.</p> <p>Request that the City implement Hemson’s suggestion in the report that the site be considered for residential uses comprising a combination of the medium- and high-density developments. A shadow study and urban design brief concluded that there will be no shadow impacts from the 24-storey building on adjacent neighbourhood and the proposed development will add architectural value and design presence to this general area.</p>	
Glen Schnarr & Associates Inc. for Lindvest Properties (10302 Heart Lake Road) – May 15 2009, RE: Inventory & Assessment of Int. Opp., Hemson, 2008			
11.	(3.2)	<p>Planning consultant for Lindvest Properties (Heart Lake) Limited, who owns approx 6 acres within the Esker Lake north SPA in the Heart Lake East Secondary Plan. In the process of coordinating the preparation of an application submission package to amend the City’s OP and Zoning By-Law to implement the client’s desired land uses (multi-building high density development) on the subject site. The subject site is within the City’s built up area and qualifies for the City’s review of intensification opportunities.</p> <p><i>Map 5.2 and Table 3.2 highlight the Hwy 410 and Bovaird Drive Transit Node.</i> The Hemson report notes that this potential intensification area contains a large area of developable land, considered largely an opportunity for medium-density development with the same potential for high-density developments. Lindvest’s property has been left out of the Potential Area for intensification opportunities as the current limit seems to border the southerly boundary of our client’s property. We believe that this was a drafting error as Lindvest’s property is at the northern limit of the Esker North SPA. We request that the final version of the Hemson report be revised to include our client’s lands.</p>	<p>The subject site is not located within a key focus area of intensification nor did the City’s Growth Plan conformity process recommend this area be identified as an intensification area. The current proposal is not justified given that it contravenes the City Structure policies and does not satisfy all of the criteria within proposed policy 3.2.7.4. This application will be considered with two other applications currently before the City in Block Plan 4-1. See detailed discussion in staff report.</p>

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		<p>Request that client's lands be listed on Table 3.2 as a short-term residential high-density development on the basis that:</p> <ul style="list-style-type: none"> • The general policy direction from the Province has placed a significant emphasis on intensification. The subject site is within the Province's Built Boundary, which is subject to the Growth Plan intensification policy and targets. Utilizing the subject site for high density development assists the City's ability to meet the Provincial intensification policy of 40% by 2015. • Hemson recommends that an increase in the max density and building height in areas around Transit Supportive Nodes. The City has identified Hwy 410 and Bovaird Dr as one of only nine areas as the City's <i>Major Transit Node</i> locations. • The City has envisioned higher density development for this general area as evidenced by the City's designation for high-density apartments in close proximity to the subject property within the Springdale Secondary Plan area immediately to the east of the subject site. • The proposed development is compatible with the surrounding land uses. • There are existing and planned community and commercial facilities within walking distance to accommodate the proposed development, and • The subject site can be developed with sufficient stormwater, municipal water and sanitary sewer services to accommodate the proposed development. 	
Rice Development Corporation, Eldomar Investments Limited – Landowners of 83, 85, 87, 95 and 99 Kennedy Road South; 3, 5, and 7A Research Road; 17, 34, 38 and 44 Dean Street - June 2, 2009, RE: Inventory & Assessment of Int. Opp., Hemson, 2008			
12.	(3.2)	<p>These uses are essentially comprised of one storey retail or automobile commercial uses with the exception of 83 Kennedy Road, which houses two floors of commercial space and a third floor of offices. In the mid- 1990s, Eldomar submitted an OPA and rezoning application that contemplated a long term re-development scenario phasing out the automobile commercial uses and introduce a mixed use building problem of retail/office, retail/residential and residential only development. Various background studies were undertaken at</p>	<p>A portion of Kennedy Road is identified as an intensification corridor in the 2006 Official Plan. The mapping within the Hemson discussion paper was intended to identify some opportunities for intensification to inform the City of its ability to accommodate planned growth within the built boundary. In addition to those recommendations in the Hemson report, opportunities for intensification along intensification corridors are open for consideration through detailed discussion and applications.</p>

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		<p>the time but the application did not advance to a final approval.</p> <p>More recently, the City undertook its Kennedy Road South Revitalization Study which looked at the long term upgrading of Kennedy Road and provided urban design guidelines for future development proposals.</p> <p>Currently, Kennedy Road South is recognized as an Intensification Corridor in the Hemson Report completed as part of the <i>Growth Plan Conformity Exercise</i>. We note that specific properties seem to be recognized in the downtown and Queen Street Areas, but less detailed recognition is provided for the Intensification Corridors. Eldomar continues to believe that the block of lands from Dean Street to Clarence Street on the west side of Kennedy Road South is appropriate for re-development and should be identified as such in any intensification documents adopted by the City.</p> <p>Eldomar is currently pursuing the submission of an OPA and rezoning for the 34-44 Dean Street lands to permit a mixed use retail/residential development. Accordingly, we wanted to confirm that mixed use retail/residential/office development such as this will be supported through the current <i>Growth Plan Conformity Exercise</i> and future intensification programming.</p>	<p>The Kennedy Road Secondary Plan serves as the best policy direction for considering this requested land use change.</p>
Peel District School Board - September 26, 2009			
13.	3.2.2	<p>There is no wording addressing the impact this growth will have on existing infrastructure and services, such as schools. Should the expansion of schools be required to meet increased need, it is imperative that there be flexibility within the Official Plan, Secondary Plans and Zoning By-laws to allow schools to accommodate this growth.</p>	<p>The City's Growth Management Program (GMP) continues to ensure the adequate supply of schools as part of the development process. Secondary Planning, Block Planning and subdivision review all include elements of reviewing the adequacy of planned infrastructure, including schools.</p>
Gagnon Law for Royalcliff Developments Inc. - Ontario Municipal Board exhibit copied to City (Complete letter contained in Appendix 10)			
14.		<p>This application has been considered by the Ontario Municipal Board at a fall 2009 hearing when detailed evidence was provided by the City. Further details on the policies of the proposed Growth Plan Official Plan Amendment are contained in this staff report.</p>	
Gagnon Law - For the North West Brampton Landowners Group - October 5, 2009			
15.	3.1	<p>Under Residential, a policy is included which directs a significant portion of new growth to the built-up area. As previously mentioned,</p>	<p>The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed</p>

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		what is meant by “significant”? <i>Official Plan</i> policy should be very clear with respect to the use of terminology.	amount of growth in each area will be refined through local planning initiatives and strategies.
16.	3.2.2.3, 3.2.2.4	Revise as they relate to height limitations as they may be inadvertently too restrictive and result in complications in the attainment of other municipal objectives related to the creation of intensification nodes within NWB and across the municipality. This concern extends to all of the policies of the Plan which advance height limitations at this time.	The revised policy continues to include maximum height in areas outside the key intensification areas and also includes a maximum residential density. A height maximum is included to maintain and plan for availability of infrastructure and hard and soft services as well as ensuring the City’s structure and objectives are maintained.
17.	3.2.7	We note that the <i>Official Plan</i> speaks to the City’s major employment districts as being strategically located in relation to transportation infrastructure and facilities. This serves to highlight the importance of transportation infrastructure in terms of its importance to the success of existing and future proposed employment areas.	Comment acknowledged.
Gagnon Law for Royalcliff Developments Inc. - October 5, 2009			
18.		Policies related to height, massing and density should be assessed on a site specific and local basis as they relate to immediate surroundings.	<p>The revised policy continues to include maximum height, massing and density to ensure the City Structure policies are maintained and intensity is aligned with availability of infrastructure such as transit and other hard and soft services.</p> <p>However, policy 3.3.7.4 provides clear criteria for considering site specific locations where increased density may be considered without adversely impacting stable neighbourhoods or other adjacent land uses.</p> <p>.</p>
19.		We support the identification of intensification opportunities both within and outside of the Central Area and UGC where transit supportive infrastructure exists and where it is appropriate to encourage higher density residential and commercial development applying appropriate criteria.	Comment acknowledged/noted.
20.	Sched 1	Amend to identify the Heart Lake Town Centre Area as a <i>Major Transit Station Area</i> . Consideration should also be given to identifying Sandalwood Parkway across the entire City as an intensification corridor due to the role it plays in the transportation network and as an organization element for planning purposes.	<p>A review of Intensification Corridors and Transit Supportive Nodes and locations of other higher order transit infrastructure was undertaken through the City’s Growth Plan conformity exercise and the resulting City Structure framework contained in the Official Plan Amendment conforms with the Growth Plan.</p> <p>No additional locations are deemed to be appropriate.</p>

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21.	Sched 1	Should be revised to identify the subject site, the Heart Lake Town Centre, Sandalwood Parkway and Kennedy Road as either a primary or secondary intensification corridor. The Heart Lake Town Centre should also be a transit station area of some significance consistent with its role and function as defined within the Heart Lake West Secondary Plan	A review of Intensification Corridors and Transit Supportive Nodes and locations of other higher order transit infrastructure was undertaken through the City's Growth Plan conformity exercise and the resulting City Structure framework contained in the Official Plan Amendment conforms with the Growth Plan. The Heart Lake Transit Terminal is not located on a higher order transit route. No additional locations are deemed to be appropriate.
22.		It should be made clear in this amendment that the promotion of the UGC and the advancement of development in this area is not at the expense of growth and development in other areas of the municipality which exhibit the attributes necessary to accommodate higher density development. There are many areas in the municipality which are suitable for residential intensification and each is important in achieving the goals and objectives of the Growth Plan.	The Urban Growth Centre, defined by the Province, is a significant, vital part of the City located completely in Brampton's Central Area. Schedule 1 – "City Concept" identifies those areas across the City that are suitable for higher density development, which includes the Central Area, Urban Growth Centre, Major Transit Station Areas, Mobility Hubs and Intensification Corridors.
23.	3.1	Under Residential, a policy is included which directs a significant portion of new growth to the built-up area. What is meant by ' <i>significant</i> '? Official Plan policy should be very clear with respect to the use of terminology.	The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.
24.	3.2	As it relates to the pursuit of a sustainable City Structure, we believe that Brampton should be committed to building a compact and transit supportive City, as appropriate, across the entire municipality. The subject site should be included as part of an intensification corridor and a focus area for development; including higher density.	A review of Intensification Corridors and Transit Supportive Nodes and locations of other higher order transit infrastructure was undertaken through the City's Growth Plan conformity exercise and the resulting City Structure framework contained in the Official Plan Amendment conforms with the Growth Plan. No additional locations are deemed to be appropriate.
25.	3.2	Could you attempt to define what is meant by ' <i>intense</i> ' concentration?	Mobility Hubs are planned to have a substantial/significant concentration of employment, living and shopping.

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26.	3.2.2	As it relates to intensification, there should be an attempt to be more deliberate in terms of what the objective is when it comes to intensification and municipal efforts. In order for the discussion regarding intensification to be meaningful, perhaps more discussion is required to ensure that while even one more unit could qualify as intensification, is this really what the municipality believes the Growth Plan exercise is focused on?	This policy has been clarified. The principles of Section 3.2.2 have now been better incorporated into the sustainable City Structure framework. The meaning of intensification and the objectives have been clearly defined.
27.	3.2.2.1	The inclusion of a reference to public participation relative to the feasibility of an infill proposal is a curious policy approach. Is one to infer by this that the municipality will not be seeking public participation if a project isn't an infill proposal? Is this policy needed, recognizing that the Planning Act specifies requirements for public participation?	Public participation is not only a requirement under the Planning Act, but also an important part of the City's planning process. As a result, this has been deleted from the policy as it is a standard requirement for all planning applications.
28.	3.2.2.2	Clarify how focusing significant intensification in certain areas as a means to accomplishing what is set out in this section i.e. high quality public open spaces (how does significant intensification do that)?	Focusing significant intensification in specific areas is not necessarily a means to achieve, high quality open spaces, for example, but a "desired" outcome. By focusing significant intensification in those areas, the City may be able to secure quality public space otherwise targeted to accommodate less compact growth.
29.	3.2.2.3	Can the City clarify how one measures potential unacceptable adverse reductions in levels of hard and soft infrastructure?	The impact to hard and soft infrastructure will vary depending on the type of infrastructure.
30.	3.2.2.4	We do not recommend that development outside of the Central Area, Mobility Hubs, Major Transit Station Areas, or intensification corridors generally be restricted to 4 storeys on account of the fact that this approach seems to be arbitrary. It would be more appropriate that the height of developments be determined through a more rigorous process whereby the merits of an individual application are assessed in the local context. The suggested height restriction seems to ignore that there may be developments that may be already greater in height than 4 storeys. It also seems to presuppose that anything taller than 4 storeys is potentially incompatible or somehow negative.	Policy 3.3.7.4 provides clear direction on when development greater than 4 storeys or 50 units/hectare may be permitted. Four storeys is commonly used by municipalities to define a built form that is compatible with most low density neighbourhoods.
31.	3.2.2.6	What is meant by "older" residential neighbourhoods? What do you mean?	This policy has been deleted from the Official Plan.
32.	3.2.2.7	It appears that height is being used as opposed to a reference to	This policy has been revised to include both a height and a density

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		density in terms of the determination of where greater concentrations of residential should occur. Is the municipality more concerned about height versus density? Could you please elaborate on why this approach is being taken and what is meant to be accomplished? It seems that the criteria would more appropriately be applied to where higher density residential should be considered as opposed to where buildings in excess of 4 storeys should be built.	guideline to give direction based on the criteria listed.
33.	3.2.2.8	There is a reference to studies related to the improvement and intensification of “older” residential areas. We do not understand why improvement is included in this policy	This is an existing policy targeting the need to ensure the ongoing maintenance of properties and municipal infrastructure as communities mature
34.	3.2.2.9	This policy speaks to the potential demand for residential intensification. It makes reference to “such accommodation”. This implies that there is a type of accommodation being studied, i.e. single-detached, semis, townhouses and apartments. The concern we have is that the policy is not explicit. We are also concerned that the policy is very open-ended in the reference to “community”. Is the community meant to be the neighbourhood, the Secondary Plan, the entire City?	Elements of this existing policy have been carried forward in a revised policy and the term “such accommodation” is no longer used. The use of “community” in the new policy is meant to be considered at the neighbourhood, secondary plan and City level.
35.	3.2.3	There is a reference to the UGC becoming “continuously more vibrant.” How does the addition of significant (an undefined term) new population and employment result in the place becoming more vibrant? It could also result in other things. Could you define what a Provincially, Nationally or Internationally significant use is? The notion of directing major intensification away from stable low density neighbourhoods to ensure a compatible mix of land uses within the Central Area and UGC is not supported by anything which indicates that major intensification would in any way de-stabilize low density neighbourhoods, nor is there anything to suggest that it by itself would ensure a compatible mix of land uses.	<p>In general, the addition of new residents, jobs, infrastructure and investment into a community can generally make it more vibrant.</p> <p>UGC’s should be a prime location for uses such as national corporate headquarters, or government buildings, such as a Provincial Courthouse.</p>
36.	3.2.4	We believe that consideration should be given to exploring whether or not the subject site has a role to play in the pursuit of the development of major transit station areas. The subject site is well suited to accommodate higher density residential.	<p>A review of Intensification Corridors, Major Transit Station Areas and Mobility Hubs was undertaken through the City’s Growth Plan conformity exercise and clarifications on the functions of each was added.</p> <p>No additional locations were deemed to be required at this time.</p>

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37.	3.2.4.1	The suggestion that building heights be capped at 8 storeys with a maximum density of 100 units per net residential hectare seems arbitrary and too low. It is conceivable that taller buildings and higher densities may be more appropriate in the local context and as a means of accomplishing the goals and objectives of the Plan.	<p>The policy has been revised to cap building heights within Major Transit Station Areas at 10 storeys with a floor space index of 1.5.</p> <p>Section 5.12 of the Official Plan identifies density bonusing; where appropriate, the implementation of density bonus provisions may be authorized for the increased height and density of a development otherwise permitted to secure amenities, features or infrastructure for the benefit of the community.</p>
38.	3.2.5, 3.2.5.1, 3.2.5.2 thru 3.2.5.4	The heights and density figures which are suggested seem arbitrary; especially considering existing developments and recently approved or contemplated applications. We recommend that these parameters be reviewed in the context of existing and approved developments as well as the goals and objectives of the Official Plan. For instance, the heights which are being suggested may be of concern in the context of the neighbourhoods where these may materialize i.e. 25 storey buildings. While perhaps appropriate at Bramalea and Steeles and surrounding are, may not be totally appropriate in the Mount Pleasant Area. Also perhaps the tallest buildings should be in the anchor hub which is in Downtown Brampton; an area in which a building taller than 20 storeys is currently being built.	<p>The heights, floor space indices and, densities in the final draft policies are based on planning and urban design principles and best practices and are intended to serve as guidelines for built form.</p> <p>The policy has been revised to allow development within Gateway Hubs to be designed to achieve a floor space index of 3.0 within buildings 3 – 25 storeys in height. Opportunities to exceed the maximum height are subject to Density bonusing (section 5.12 of the Official Plan).</p>
39.	3.2.6, 3.2.6.1 thru 3.2.6.6	Certain highway commercial and auto repair uses are being discouraged, which may in fact be quite appropriately located in these corridors considering that they correspond with some of the most heavily traveled roadways in the City. Purely from a practical perspective, these uses might be needed in these areas; subject of course to proper controls. Apart from the foregoing, it seems that the building heights and floor space indexes are arbitrary and too low in the context of existing and planned developments as well as the goals and objectives of the Official Plan. If the parameters for development are too severely capped, it is conceivable that development may not proceed and the objectives of the Plan left unfulfilled. Also, if the intensification corridors are the areas with higher order transit, it seems appropriate that higher density development be promoted and permitted in these areas as a means of maximizing the use of transit and other available infrastructure. It	<p>This existing policy continues to ensure that the higher-order commercial and residential uses are located along intensification corridors. These uses do not lend themselves to the kind of mixed use development envisioned along these Intensification Corridors, nor do they achieve the urban design objectives.</p> <p>A framework for the scale of development is required to ensure the City's goals are achieved, especially with respect to the key elements of city infrastructure. The Growth Plan requires a minimum density for intensification corridors that will support the viability of existing and planned transit service levels.</p> <p>The policies allow opportunities for density bonusing (Section 5.12 of the Official Plan).</p>

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		may be more appropriate to permit taller buildings subject to detailed studies being prepared at the Secondary Plan, Block Plan, Amendment Application and Site Plan stage as may be appropriate.	
40.	3.2.8	Reference to new communities contributing to the creation of <i>complete communities</i> . It may be more appropriate to reference and suggest that new communities and all new developments should contribute toward the creation of complete communities.	The policy has been revised to reflect that <u>new communities and new development</u> within existing communities will be planned to be complete communities, where access to jobs, services, housing, infrastructure and transportation are provided to meet the needs for daily living.
41.	4.1.1.2 (under appeal)	Housing mix and density categories are referenced. Perhaps the municipality should consider expanding the list of what is referenced to include the new categories which are being recommended i.e. the various nodes and corridors for intensification, the gateways, and the hubs. The table could be updated once discussion have concluded in connection with appropriate densities, permitted housing types and heights, commensurate with the goals and objectives of the Official Plan.	The nodes and corridors are elements of City Structure which do not assign land use; the land use designations and city structure elements are both required to determine use, form and density.
42.	4.1.1.9	The original Official Plan policies pertaining to the location of proposed high density residential buildings and associated criteria have served the municipality quite well. We would recommend against the addition of the reference to certain geographic areas of the City on the basis that the rest of the criteria are related to factors which can be measured and assessed in terms of impact and appropriateness. It is quite conceivable that a site in the UGC might not be appropriate for a higher density residential use because it fails to “score” favorably in terms of the other four criteria. The way the policy is written now, simply being located in the UGC would mean a project could proceed, even though it may not have appropriate access, it may not be located adjacent to compatible uses, it may impact an environmental feature and it may not be located close to public transit. Good planning and the proper location of higher density residential is more than just simply being located in a geographic area – it is about context and the availability of the infrastructure, services and facilities needed to support it.	The OPA contains clear policies on the City’s vision for intensification and criteria which will guide consideration for increases in density. In all cases, good planning principles continue to apply.
Gagnon Law for RG’s Group Inc. - October 5, 2009			
43.	3.1	Under Residential, a policy is included which directs a significant portion of new growth to the built-up area. What is meant by	The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed

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		'significant'? Official Plan policy should be very clear with respect to the use of terminology.	amount of growth in each area will be refined through local planning initiatives and strategies.
44.	3.2	As it relates to the pursuit of a sustainable City Structure, we believe that Brampton should be committed to building a compact and transit supportive City, as appropriate, across the entire municipality. The subject site should be included as part of an intensification corridor and a focus area for development; including higher density.	Staff acknowledges that a portion of the subject site is located within the Central Area and as such this portion of the site would be subject to the Central Area intensification policies. The remainder of the subject site is not identified as a key focus area of intensification nor did the City's Growth Plan conformity process recommend this area to be identified as a focus area of intensification. See detailed discussion in staff report.
45.	3.2	Could you attempt to define what is meant by 'intense' concentration?	Mobility Hubs are planned to have a substantial/significant concentration of employment, living and shopping around a major transit station area.
46.	3.2.2	As it relates to intensification, there should be an attempt to be more deliberate in terms of what the objective is when it comes to intensification and municipal efforts. In order for the discussion regarding intensification to be meaningful, perhaps more discussion is required to ensure that while even one more unit could qualify as intensification, is this really what the municipality believes the Growth Plan exercise is focused on?	This policy has been clarified. The principles of Section 3.2.2 have now been better incorporated into the sustainable city structure framework. The meaning of intensification and the objectives have been clearly defined.
47.	3.2.2.1	The inclusion of a reference to public participation relative to the feasibility of an infill proposal is a curious policy approach. Is one to infer by this that the municipality will not be seeking public participation if a project isn't an infill proposal? Is this policy needed, recognizing that the Planning Act specifies requirements for public participation?	Public participation is not only a requirement under the Planning Act, but also an important part of the City's planning process. As a result, this has been deleted from the policy as it is a standard requirement for all planning applications.
48.	3.2.2.2	Can you clarify how focusing significant intensification in certain areas as a means to accomplishing what is set out in this section i.e. high quality public open spaces (how does significant intensification do that)	Focusing significant intensification in specific areas is not necessarily a means to achieve, high quality open spaces, for example, but a "desired" outcome. By focusing significant intensification in those areas, the City may be able to secure the provisions of quality public space otherwise targeted to accommodate less compact growth.
49.	3.2.2.3	Can the City clarify how one measures potential unacceptable adverse reductions in levels of hard and soft infrastructure?	The impact to hard and soft infrastructure will vary depending on the type of infrastructure.
50.	3.2.2.4	We do not recommend that development outside of the <i>Central Area</i> , <i>Mobility Hubs</i> , <i>Major Transit Station Areas</i> , or <i>intensification corridors</i> generally be restricted to 4 storeys on account of the fact that this	Policy 3.3.7.4 provides clear direction on when development greater than 4 storeys or 50 units/hectare may be permitted. Four storeys is commonly used by municipalities to define a built form that is

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		approach seems to be arbitrary. It would be more appropriate that the height of developments be determined through a more rigorous process whereby the merits of an individual application are assessed in the local context. The suggested height restriction seems to ignore that there may be developments that may be already greater in height than 4 storeys. It also seems to presuppose that anything taller than 4 storeys is potentially incompatible or somehow negative.	compatible with most low density neighbourhoods.
51.	3.2.2.6	There are references made to “older” residential neighbourhoods. The term “older” is not defined. What do you mean?	This Policy has been deleted from the Official Plan.
52.	3.2.2.7	It appears that height is being used as opposed to a reference to density in terms of the determination of where greater concentrations of residential should occur. Is the municipality more concerned about height versus density? Could you please elaborate on why this approach is being taken and what is meant to be accomplished? It seems that the criteria would more appropriately be applied to where higher density residential should be considered as opposed to where buildings in excess of 4 storeys should be built.	This policy has been revised to include both a height and a density guideline to give direction based on the criteria listed.
53.	3.2.2.8	There is a reference to studies related to the improvement and intensification of “older” residential areas. We do not understand why improvement is included in this policy	This is an existing policy targeting the need to ensure the ongoing maintenance of properties and municipal infrastructure as communities mature.
54.	3.2.2.9	This policy speaks to the potential demand for residential intensification. It makes reference to “such accommodation”. This implies that there is a type of accommodation being studied, i.e. single-detached, semis, townhouses and apartments. The concern we have is that the policy is not explicit. We are also concerned that the policy is very open-ended in the reference to “community”. Is the community meant to be the neighbourhood, the Secondary Plan, the entire City?	Elements of this existing policy have been carried forward in a revised policy and the term “such accommodation” is no longer used. The use of “community” in the new policy is meant to be considered at the neighbourhood, secondary plan and City level.
55.	3.2.3	There is a reference to the UGC becoming “ <i>continuously more vibrant.</i> ” How does the addition of significant (an undefined term) new population and employment result in the place becoming more vibrant? It could also result in other things. Could you define what a Provincially, Nationally or Internationally significant use is? The notion of directing major intensification away from stable low density neighbourhoods to ensure a compatible mix of land uses within the Central Area and UGC is not supported by anything which indicates	<p>In general, the addition of new residents, jobs, infrastructure and investment into a community can generally make it more vibrant.</p> <p>UGC’s should be a prime location for uses such as national corporate headquarters, or government buildings, such as a Provincial Courthouse.</p>

#	Section	Comment	Staff Response
		that major intensification would in any way de-stabilize low density neighbourhoods, nor is there anything to suggest that it by itself would ensure a compatible mix of land uses.	
56.	3.2.4	We believe that consideration should be given to exploring whether or not the subject site has a role to play in the pursuit of the development of major transit station areas. The subject site is well suited to accommodate higher density residential.	A review of Intensification Corridors, Major Transit Station Areas and Mobility Hubs was undertaken through the City's Growth Plan conformity exercise and clarifications on the functions of each was added. No additional locations were deemed to be required at this time.
57.	3.2.4.1	The suggestion that building heights be capped at 8 storeys with a maximum density of 100 units per net residential hectare seems arbitrary and too low. It is conceivable that taller buildings and higher densities may be more appropriate in the local context and as a means of accomplishing the goals and objectives of the Plan.	<p>The policy has been revised to cap building heights within Major Transit Station Areas at 10 storeys with a floor space index of 1.5.</p> <p>Section 5.12 of the Official Plan identifies density bonusing; where appropriate, the implementation of density bonus provisions may be authorized for the increased height and density of a development otherwise permitted to secure amenities, features or infrastructure for the benefit of the community.</p>
58.	3.2.5, 3.2.5.1, 3.2.5.2 thru 3.2.5.4.	The heights and density figures which are suggested seem arbitrary; especially considering existing developments and recently approved or contemplated applications. We recommend that these parameters be reviewed in the context of existing and approved developments as well as the goals and objectives of the Official Plan. For instance, the heights which are being suggested may be of concern in the context of the neighbourhoods where these may materialize i.e. 25 storey buildings. While perhaps appropriate at Bramalea and Steeles and surrounding area, may not be totally appropriate in the Mount Pleasant Area. Also perhaps the tallest buildings should be in the anchor hub which is in Downtown Brampton; an area in which a building taller than 20 storeys is currently being built.	<p>The heights, floor space indices and, densities in the final draft policies are based on planning and urban design principles and best practices and are intended to serve as guidelines for built form.</p> <p>The policy has been revised to allow development within Gateway Hubs to be designed to achieve a floor space index of 3.0 within buildings 3 – 25 storeys in height. Opportunities to exceed the maximum height are subject to Density bonusing (section 5.12 of the Official Plan).</p>
59.	3.2.6, 3.2.6.1 thru 3.2.6.6	Certain highway commercial and auto repair uses are being discouraged, which may in fact be quite appropriately located in these corridors considering that they correspond with some of the most heavily traveled roadways in the City. Purely from a practical perspective, these uses might be needed in these areas; subject of course to proper controls. Apart from the foregoing, it seems that the building heights and floor space indexes are arbitrary and too low in the context of existing and planned developments as well as the	<p>This existing policy continues to ensure that the higher-order commercial and residential uses are located along intensification corridors. These uses do not lend themselves to the kind of mixed use development envisioned along these Intensification Corridors, nor do they achieve the urban design objectives.</p> <p>A framework for the scale of development is required to ensure the City's goals are achieved, especially with respect to the key elements</p>

#	Section	Comment	Staff Response
		goals and objectives of the Official Plan. If the parameters for development are too severely capped, it is conceivable that development may not proceed and the objectives of the Plan left unfulfilled. Also, if the intensification corridors are the areas with higher order transit, it seems appropriate that higher density development be promoted and permitted in these areas as a means of maximizing the use of transit and other available infrastructure. It may be more appropriate to permit taller buildings subject to detailed studies being prepared at the Secondary Plan, Block Plan, Amendment Application and Site Plan stage as may be appropriate.	of city infrastructure. The Growth Plan requires a minimum density for intensification corridors that will support the viability of existing and planned transit service levels. The policies allow opportunities for density bonusing (Section 5.12 of the Official Plan).
60.	3.2.8	There is a reference to new communities contributing to the creation of complete communities. It may be more appropriate to reference and suggest that new communities and all new developments should contribute toward the creation of complete communities.	The policy has been revised to reflect that <u>new communities and new development</u> within existing communities will be planned to be complete communities, where access to jobs, services, housing, infrastructure and transportation are provided to meet the needs for daily living.
Gagnon Law for Medallion Properties Inc. - October 5, 2009			
61.	3.1	Under Residential, a policy is included which directs a significant portion of new growth to the built-up area. What is meant by 'significant'? Official Plan policy should be very clear with respect to the use of terminology.	The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.
62.	3.2	As it relates to the pursuit of a sustainable City Structure, we believe that Brampton should be committed to building a compact and transit supportive City, as appropriate, across the entire municipality. The subject site should be included as part of an intensification corridor and a focus area for development; including higher density.	This application is along an Intensification Corridor. Bramalea Road has been re-designated as a Primary Intensification Corridor, where higher height and density is permitted than along Secondary Intensification Corridors.
63.	3.2	Could you attempt to define what is meant by 'intense' concentration?	Mobility Hubs are planned to have a substantial/significant concentration of employment, living and shopping around a major transit station area.
64.	3.2.2	As it relates to intensification, there should be an attempt to be more deliberate in terms of what the objective is when it comes to intensification and municipal efforts. In order for the discussion regarding intensification to be meaningful, perhaps more discussion is required to ensure that while even one more unit could qualify as intensification, is this really what the municipality believes the Growth Plan exercise is focused on?	This policy has been clarified. The principles of Section 3.2.2 have now been better incorporated into the sustainable city structure framework. The meaning of intensification and the objectives have been clearly defined.
65.	3.2.2.1	The inclusion of a reference to public participation relative to the	Public participation is not only a requirement under the Planning Act,

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		feasibility of an infill proposal is a curious policy approach. Is one to infer by this that the municipality will not be seeking public participation if a project isn't an infill proposal? Is this policy needed, recognizing that the Planning Act specifies requirements for public participation?	but also an important part of the City's planning process. As a result, this has been deleted from the policy as it is a standard requirement for all planning applications.
66.	3.2.2.2	Can you clarify how focusing significant intensification in certain areas as a means to accomplishing what is set out in this section i.e. high quality public open spaces (how does significant intensification do that)	Focusing significant intensification in specific areas is not necessarily a means to achieve, high quality open spaces, for example, but a "desired" outcome. By focusing significant intensification in those areas, the City may be able to secure the provisions of quality public space otherwise targeted for less compact development.
67.	3.2.2.3	Can the City clarify how one measures potential unacceptable adverse reductions in levels of hard and soft infrastructure?	The impact to hard and soft infrastructure will vary depending on the type of infrastructure.
68.	3.2.2.4	We do not recommend that development outside of the <i>Central Area, Mobility Hubs, Major Transit Station Areas, or intensification corridors</i> generally be restricted to 4 storeys on account of the fact that this approach seems to be arbitrary. It would be more appropriate that the height of developments be determined through a more rigorous process whereby the merits of an individual application are assessed in the local context. The suggested height restriction seems to ignore that there may be developments that may be already greater in height than 4 storeys. It also seems to presuppose that anything taller than 4 storeys is potentially incompatible or somehow negative.	The revised amendment is now worded to take into consideration those developments greater than 4 storeys or 50 units/ha. Four storeys is commonly used by municipalities for defining built form that is compatible with surrounding low density uses.
69.	3.2.2.6	There are references made to " <i>older</i> " residential neighbourhoods. The term " <i>older</i> " is not defined. What do you mean?	This policy has been deleted from the Official Plan.
70.	3.2.2.7	It appears that height is being used as opposed to a reference to density in terms of the determination of where greater concentrations of residential should occur. Is the municipality more concerned about height versus density? Could you please elaborate on why this approach is being taken and what is meant to be accomplished? It seems that the criteria would more appropriately be applied to where higher density residential should be considered as opposed to where buildings in excess of 4 storeys should be built.	This policy has been revised to include both a height and a density guideline to give direction based on the criteria listed.
71.	3.2.2.8	There is a reference to studies related to the improvement and intensification of " <i>older</i> " residential areas. We do not understand why improvement is included in this policy	This is an existing policy targeting the need to ensure the ongoing maintenance of properties and municipal infrastructure as community's mature.
72.	3.2.2.9	This policy speaks to the potential demand for residential	Elements of this existing policy have been carried forward in a revised

#	Section	Comment	Staff Response
		intensification. It makes reference to “such accommodation”. This implies that there is a type of accommodation being studies, i.e. single-detached, semis, townhouses and apartments. The concern we have is that the policy is not explicit. We are also concerned that the policy is very open-ended in the reference to “community”. Is the community meant to be the neighbourhood, the Secondary Plan, the entire City?	policy and the term “such accommodation” is no longer used. The use of “community” in the new policy is meant to be considered at the neighbourhood, secondary plan and City level.
73.	3.2.3	There is a reference to the UGC becoming “ <i>continuously more vibrant.</i> ” How does the addition of significant (an undefined term) new population and employment result in the place becoming more vibrant? It could also result in other things. Could you define what a Provincially, Nationally or Internationally significant use is? The notion of directing major intensification away from stable low density neighbourhoods to ensure a compatible mix of land uses within the Central Area and UGC is not supported by anything which indicates that major intensification would in any way de-stabilize low density neighbourhoods, nor is there anything to suggest that it by itself would ensure a compatible mix of land uses.	In general the addition of new residents, jobs, infrastructure and investment into a community can generally make it more vibrant. UGC’s should be a prime location for uses such as national corporate headquarters, or government buildings, such as a Provincial Courthouse.
74.	3.2.4	We believe that consideration should be given to exploring whether or not the subject site has a role to play in the pursuit of the development of Major Transit Station Areas. The subject site is well suited to accommodate higher density residential.	As the site is within the Bramalea Gateway Mobility Hub, development can to be designed to achieve a floor space index of 3.0.
75.	3.2.4.1	The suggestion that building heights be capped at 8 storey’s with a maximum density of 100 units per net residential hectare seems arbitrary and too low. It is conceivable that taller buildings and higher densities may be more appropriate in the local context and as a means of accomplishing the goals and objectives of the Plan.	The policy has been revised to cap building heights within Major Transit Station Areas at 10 storeys with a floor space index of 1.5. Section 5.12 of the Official Plan identifies density bonusing ; when appropriate, the implementation of density bonus provisions may be authorized for the increased height and density of a development otherwise permitted to secure amenities, features or infrastructure for the benefit of the community.
76.	3.2.5, 3.2.5.1, 3.2.5.2 thru 3.2.5.4.	The heights and density figures which are suggested seem arbitrary; especially considering existing developments and recently approved or contemplated applications. We recommend that these parameters be reviewed in the context of existing and approved developments as well as the goals and objectives of the Official Plan. For instance, the heights which are being suggested may be of concern in the context	The heights, floor space indices and, densities in the final draft policies are based on planning and urban design principles and best practices and are intended to serve as guidelines for built form. The policy has been revised to allow development within Gateway Hubs to be designed to achieve a floor space index of 3.0 within

#	Section	Comment	Staff Response
		of the neighbourhoods where these may materialize i.e. 25 storey buildings. While perhaps appropriate at Bramalea and Steeles and surrounding are, may not be totally appropriate in the Mount Pleasant Area. Also perhaps the tallest buildings should be in the anchor hub which is in Downtown Brampton; an area in which a building taller than 20 storey's is currently being built.	buildings 3 – 25 storeys in height, opportunities to exceed the maximum height are subject to Density bonusing (section 5.12 of the Official Plan).
77.	3.2.6, 3.2.6.1 thru 3.2.6.6	Certain highway commercial and auto repair uses are being discouraged, which may in fact be quite appropriately located in these corridors considering that they correspond with some of the most heavily traveled roadways in the City. Purely from a practical perspective, these uses might be needed in these areas; subject of course to proper controls. Apart from the foregoing, it seems that the building heights and floor space indexes are arbitrary and too low in the context of existing and planned developments as well as the goals and objectives of the Official Plan. If the parameters for development are too severely capped, it is conceivable that development may not proceed and the objectives of the Plan left unfulfilled. Also, if the intensification corridors are the areas with higher order transit, it seems appropriate that higher density development be promoted and permitted in these areas as a means of maximizing the use of transit and other available infrastructure. It may be more appropriate to permit taller buildings subject to detailed studies being prepared at the Secondary Plan, Block Plan, Amendment Application and Site Plan stage as may be appropriate.	<p>The existing policy continues to ensure that the higher-order commercial and residential uses are located along intensification corridors. These uses do not lend themselves to the kind of mixed use envisioned along these Intensification Corridors nor to achieving the urban design objectives.</p> <p>A framework for the scale of development is required to ensure the City's goals are achieved, especially with respect to the key elements of city infrastructure. The Growth Plan requires a minimum density for intensification corridors that will support the viability of existing and planned transit service levels.</p> <p>The policies allow opportunities for density bonusing (Section 5.12 of the Official Plan) to apply.</p>
78.	3.2.8	There is a reference to new communities contributing to the creation of <i>complete communities</i> . It may be more appropriate to reference and suggest that new communities and all new developments should contribute toward the creation of complete communities.	The policy has been revised to reflect that <u>new communities and new development</u> within existing communities will be planned to be complete communities, where access to jobs, services, housing, infrastructure and transportation are provided to meet the needs for daily living.
Gagnon Law for RG's Group Inc. - October 5, 2009			
79.	4.1.1.2 (under appeal)	Housing mix and density categories are referenced. Perhaps the municipality should consider expanding the list of what is referenced to include the new categories which are being recommended i.e. the various nodes and corridors for intensification, the gateways, and the hubs. The table could be updated once discussions have concluded in connection with appropriate densities, permitted housing types and	The nodes and corridors are elements of City Structure which do not assign land use; the land use designations and city structure elements are both required to determine use, form and density.

#	Section	Comment	Staff Response
		heights, commensurate with the goals and objectives of the Official Plan.	
80.	4.1.1.9	The original Official Plan policies pertaining to the location of proposed high density residential buildings and associated criteria have served the municipality quite well. We would recommend against the addition of the reference to certain geographic areas of the City on the basis that the rest of the criteria are related to factors which can be measured and assessed in terms of impact and appropriateness. It is quite conceivable that a site in the UGC might not be appropriate for a higher density residential use because it fails to “score” favorably in terms of the other four criteria. The way the policy is written now, simply being located in the UGC would mean a project could proceed, even though it may not have appropriate access, it may not be located adjacent to compatible uses, it may impact an environmental feature and it may not be located close to public transit. Good planning and the proper location of higher density residential is more than just simply being located in a geographic area – it is about context and the availability of the infrastructure, services and facilities needed to support it.	The OPA contains clear policies on the City’s vision for intensification and criteria which will guide consideration for increases in density. In all cases, good planning principles continue to apply.
Gagnon Law for Medallion Properties Inc. - October 5, 2009			
81.	4.1.1.2 (under appeal)	Housing mix and density categories are referenced. Perhaps the municipality should consider expanding the list of what is referenced to include the new categories which are being recommended i.e. the various nodes and corridors for intensification, the gateways, and the hubs. The table could be updated once discussion have concluded in connection with appropriate densities, permitted housing types and heights, commensurate with the goals and objectives of the Official Plan.	The nodes and corridors are elements of City Structure which do not assign land use; the land use designations and city structure elements are both required to determine use, form and density.
82.	4.1.1.9	The original Official Plan policies pertaining to the location of proposed high density residential buildings and associated criteria have served the municipality quite well. We would recommend against the addition of the reference to certain geographic areas of the City on the basis that the rest of the criteria are related to factors which can be measured and assessed in terms of impact and appropriateness. It is quite conceivable that a site in the UGC might not be appropriate for a higher density residential use because it fails	The OPA contains clear policies on the City’s vision for intensification and criteria which will guide consideration for increases in density. In all cases, good planning principles continue to apply..

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		to “score” favorably in terms of the other four criteria. The way the policy is written now, simply being located in the UGC would mean a project could proceed, even though it may not have appropriate access, it may not be located adjacent to compatible uses, it may impact an environmental feature and it may not be located close to public transit. Good planning and the proper location of higher density residential is more than just simply being located in a geographic area – it is about context and the availability of the infrastructure, services and facilities needed to support it.	
Gagnon Law – For 2077060 Ontario Inc. (Saberwood Homes) - October 5, 2009			
83.	3.1	Under Residential, a policy is included which directs a significant portion of new growth to the built-up area. What is meant by ‘significant’? Official Plan policy should be very clear with respect to the use of terminology.	The Official Plan provides the necessary policy direction for the relative amount of Growth for the key intensification areas. The detailed amount of growth in each area will be refined through local planning initiatives and strategies.
84.	3.2	As it relates to the pursuit of a sustainable City Structure, we believe that Brampton should be committed to building a compact and transit supportive City, as appropriate, across the entire municipality. The subject site should be included as part of an intensification corridor and a focus area for development; including higher density.	The subject site is not located within a key focus area of intensification nor did the City’s Growth Plan conformity process recommend this area to be identified as a focus area of intensification. It is recognized that this proposal is being considered in conjunction within two other applications currently before the City in Block Plan 4-1. See Staff Report for detailed comments.
85.	3.2	Could you attempt to define what is meant by ‘intense’ concentration?	Mobility Hubs are planned to have a substantial/significant concentration of employment, living and shopping around a major transit station area.
86.	3.2.2	As it relates to intensification, there should be an attempt to be more deliberate in terms of what the objective is when it comes to intensification and municipal efforts. In order for the discussion regarding intensification to be meaningful, perhaps more discussion is required to ensure that while even one more unit could qualify as intensification, is this really what the municipality believes the Growth Plan exercise is focused on?	This policy has been clarified. The principles of Section 3.2.2 have now been better incorporated into the sustainable city structure framework. The meaning of intensification and the objectives have been clearly defined.
87.	3.2.2.1	The inclusion of a reference to public participation relative to the feasibility of an infill proposal is a curious policy approach. Is one to infer by this that the municipality will not be seeking public participation if a project isn’t an infill proposal? Is this policy needed, recognizing that the Planning Act specifies requirements for public participation?	Public participation is not only a requirement under the Planning Act, but also an important part of the City’s planning process. As a result, this has been deleted from the policy as it is a standard requirement for all planning applications.

#	Section	Comment	Staff Response
88.	3.2.2.2	Can you clarify how focusing significant intensification in certain areas as a means to accomplishing what is set out in this section i.e. high quality public open spaces (how does significant intensification do that)	Focusing significant intensification in specific areas is not necessarily a means to achieve, high quality open spaces, for example, but a “desired” outcome. By focusing significant intensification in those areas, the City may be able to secure the provisions of quality public space otherwise targeted to accommodate less compact growth.
89.	3.2.2.3	Can the City clarify how one measures potential unacceptable adverse reductions in levels of hard and soft infrastructure?	The impact to hard and soft infrastructure will vary depending on the type of infrastructure.
90.	3.2.2.4	We do not recommend that development outside of the <i>Central Area, Mobility Hubs, Major Transit Station Areas, or intensification corridors</i> generally be restricted to 4 storeys on account of the fact that this approach seems to be arbitrary. It would be more appropriate that the height of developments be determined through a more rigorous process whereby the merits of an individual application are assessed in the local context. The suggested height restriction seems to ignore that there may be developments that may be already greater in height than 4 storeys. It also seems to presuppose that anything taller than 4 storeys is potentially incompatible or somehow negative.	Policy 3.3.7.4 provides clear direction on when development greater than 4 storeys or 50 units/hectare may be permitted. Four storeys is commonly used by municipalities to define a built form that is compatible with most low density neighbourhoods.
91.	3.2.2.6	There are references made to “older residential neighbourhoods. The term “ <i>older</i> ” is not defined. What do you mean?	This Policy has been deleted from the Official Plan.
92.	3.2.2.7	It appears that height is being used as opposed to a reference to density in terms of the determination of where greater concentrations of residential should occur. Is the municipality more concerned about height versus density? Could you please elaborate on why this approach is being taken and what is meant to be accomplished? It seems that the criteria would more appropriately be applied to where higher density residential should be considered as opposed to where buildings in excess of 4 storeys should be built.	This policy has been revised to include both a height and a density guideline to give direction based on the criteria listed.
93.	3.2.2.8	There is a reference to studies related to the improvement and intensification of “ <i>older</i> ” residential areas. We do not understand why improvement is included in this policy	This is an existing policy targeting the need to ensure the ongoing maintenance of properties and municipal infrastructure as communities mature.
94.	3.2.2.9	This policy speaks to the potential demand for residential intensification. It makes reference to “such accommodation”. This implies that there is a type of accommodation being studied, i.e. single-detached, semis, townhouses and apartments. The concern we have is that the policy is not explicit. We are also concerned that the policy is very open-ended in the reference to “ <i>community</i> ”. Is the	Elements of this existing policy have been carried forward in a revised policy and the term “such accommodation” is no longer used. The use of “community” in the new policy is meant to be considered at the neighbourhood, secondary plan and City level.

#	Section	Comment	Staff Response
		community meant to be the neighbourhood, the Secondary Plan, the entire City?	
95.	3.2.3	There is a reference to the UGC becoming “ <i>continuously more vibrant.</i> ” How does the addition of significant (an undefined term) new population and employment result in the place becoming more vibrant? It could also result in other things. Could you define what a Provincially, Nationally or Internationally significant use is? The notion of directing major intensification away from stable low density neighbourhoods to ensure a compatible mix of land uses within the Central Area and UGC is not supported by anything which indicates that major intensification would in any way de-stabilize low density neighbourhoods, nor is there anything to suggest that it by itself would ensure a compatible mix of land uses.	In general, the addition of new residents, jobs, infrastructure and investment into a community can generally make it more vibrant. UGC’s should be a prime location for uses such as national corporate headquarters, or government buildings, such as a Provincial Courthouse.
96.	3.2.4.1	The suggestion that building heights be capped at 8 storeys with a maximum density of 100 units per net residential hectare seems arbitrary and too low. It is conceivable that taller buildings and higher densities may be more appropriate in the local context and as a means of accomplishing the goals and objectives of the Plan.	The policy has been revised to cap building heights within Major Transit Station Areas at 10 storeys with a floor space index of 1.5. Section 5.12 of the Official Plan identifies density bonusing where the implementation of density bonus provisions may be authorized for the increased height and density of a development otherwise permitted to secure amenities, features or infrastructure for the benefit of the community.
97.	3.2.5, 3.2.5.1, 3.2.5.2 thru 3.2.5.4.	The heights and density figures which are suggested seem arbitrary; especially considering existing developments and recently approved or contemplated applications. We recommend that these parameters be reviewed in the context of existing and approved developments as well as the goals and objectives of the Official Plan. For instance, the heights which are being suggested may be of concern in the context of the neighbourhoods where these may materialize i.e. 25 storey buildings. While perhaps appropriate at Bramalea and Steeles and surrounding are, may not be totally appropriate in the Mount Pleasant Area. Also perhaps the tallest buildings should be in the anchor hub which is in Downtown Brampton; an area in which a building taller than 20 storeys is currently being built.	The heights, floor space indices and, densities in the final draft policies are based on planning and urban design principles and best practices and are intended to serve as guidelines for built form. The policy has been revised to allow development within Gateway Hubs to be designed to achieve a floor space index of 3.0 within buildings 3 – 25 storeys in height. Opportunities to exceed the maximum height are subject to Density bonusing (section 5.12 of the Official Plan).
98.	3.2.6, 3.2.6.1 thru	Certain highway commercial and auto repair uses are being discouraged, which may in fact be quite appropriately located in these corridors considering that they correspond with some of the	The existing policy continues to ensure that the higher-order commercial and residential uses are located along intensification corridors. These uses do not lend themselves to the kind of mixed use

#	Section	Comment	Staff Response
	3.2.6.6	most heavily traveled roadways in the City. Purely from a practical perspective, these uses might be needed in these areas; subject of course to proper controls. Apart from the foregoing, it seems that the building heights and floor space indexes are arbitrary and too low in the context of existing and planned developments as well as the goals and objectives of the Official Plan. If the parameters for development are too severely capped, it is conceivable that development may not proceed and the objectives of the Plan left unfulfilled. Also, if the intensification corridors are the areas with higher order transit, it seems appropriate that higher density development be promoted and permitted in these areas as a means of maximizing the use of transit and other available infrastructure. It may be more appropriate to permit taller buildings subject to detailed studies being prepared at the Secondary Plan, Block Plan, Amendment Application and Site Plan stage as may be appropriate.	<p>envisioned along these Intensification Corridors nor to achieving the urban design objectives.</p> <p>A framework for the scale of development is required to ensure the City's goals are achieved, especially with respect to the key elements of city infrastructure. The Growth Plan requires a minimum density for intensification corridors that will support the viability of existing and planned transit service levels.</p> <p>The policies allow opportunities for density bonusing (Section 5.12 of the Official Plan) to apply.</p>
99.	3.2.8	There is a reference to new communities contributing to the creation of complete communities. It may be more appropriate to reference and suggest that new communities and all new developments should contribute toward the creation of complete communities.	The policy has been revised to reflect that <u>new communities and new development</u> within existing communities will be planned to be complete communities, where access to jobs, services, housing, infrastructure and transportation are provided to meet the needs for daily living.
100.	4.1.1.2 (under appeal)	Housing mix and density categories are referenced. Perhaps the municipality should consider expanding the list of what is referenced to include the new categories which are being recommended i.e. the various nodes and corridors for intensification, the gateways, and the hubs. The table could be updated once discussion have concluded in connection with appropriate densities, permitted housing types and heights, commensurate with the goals and objectives of the Official Plan.	The nodes and corridors are elements of City Structure which do not assign land use; the land use designations and city structure elements are both required to determine use, form and density.
101.	4.1.1.9	In the original Official Plan policies pertaining to the location of proposed high density residential buildings and associated criteria have served the municipality quite well. We would recommend against the addition of the reference to certain geographic areas of the City on the basis that the rest of the criteria are related to factors which can be measured and assessed in terms of impact and appropriateness. It is quite conceivable that a site in the UGC might not be appropriate for a higher density residential use because it fails	The OPA contains clear policies on the City's vision for intensification and criteria which will guide consideration for increases in density. In all cases, good planning principles continue to apply..

#	Section	Comment	Staff Response
		to “score” favorably in terms of the other four criteria. The way the policy is written now, simply being located in the UGC would mean a project could proceed, even though it may not have appropriate access, it may not be located adjacent to compatible uses, it may impact an environmental feature and it may not be located close to public transit. Good planning and the proper location of higher density residential is more than just simply being located in a geographic area – it is about context and the availability of the infrastructure, services and facilities needed to support it.	
TRCA - October 21, 2009			
102.	3.1	<p>To better promote natural resource conservation and for consistency throughout this plan, we recommend the following be added to this section;</p> <p>Natural Areas and Environmental Management TRCA staff understand the importance of affordability in the creation and implementation of programs. However, in the spirit of triple-bottom-line approach, which is emphasized in the Official Plan, project initiatives need to be assessed in terms of their contribution to community net improvements/gains and cost efficiency over the long term. We suggest that “<i>affordable</i>” be replaced with “<i>achievable</i>” in the last bullet on page 3-4.</p>	This policy has been revised to discuss the financial feasibility of natural areas and environmental management.
103.	3.2.2	In order to highlight the importance of preserving and enhancing existing natural areas through redevelopment please add an additional policy discussing natural heritage preservation. For example “ <i>through intensification the City shall seek opportunities to manage, restore, enhance and reconnect existing open space and natural areas as appropriate.</i> ”	Policy language has been incorporated into policy 4.5.6.6.
104.	3.2.3	As you are aware, a significant portion of Brampton’s Central Area has been designated a “Special Policy Area” by the Province due to its location within a floodplain. Reference to this special policy area should be reflected in this section as it is a key consideration in achieving the density targets of the Growth Plan. To reinforce the City of Brampton’s high standard for public safety and risk management, and to ensure that this plan clearly does not conflict with Provincial natural hazard management policies we suggest that	The Central Area Secondary Plan contains detailed policies on the Special Policy Area. At such time as the Secondary Plan is amended through current discussions between the City, TRCA and the Province, more detailed references to the Growth Plan objectives are proposed.

#	Section	Comment	Staff Response
		the following be added to the end of the first bullet on page 3-13: <i>“while considering unique concerns for public safety requirements with respect to natural hazards and flooding.”</i>	
Region of Peel - October 29, 2009			
105.		We note that the City’s <i>Central Area</i> is located within the <i>Urban Growth Centre</i> and that the City wants to develop and maintain a vibrant Central Area. The Growth Plan, on the other hand, places a great degree of significance on the <i>Urban Growth Centre</i> . (Policies on pages 3-6, 3-12 & 13, X-1 and 2 following page 3-22). In order to ensure that there is no confusion in differentiating these two areas, we suggest the following revisions: a) Brampton’s Central area is located within the limits of the Urban Growth Centre b) Replace bullet 2 of section 3.2, page 306 with “A vibrant Central Area within a strong Urban Growth Centre”	The policies have been written to provide clarity on the relationship between the two entities, including the addition of the new map of the Urban Growth Centre.
106.	3.2.2.6	Refers to “older” residential neighbourhoods where consideration would be given to increase residential density. It would be helpful if the location of these neighbourhoods is described or identified on one of the schedules.	The term “older residential neighbourhoods” have been removed.
107.	3.1	The addition of “connects seamlessly to inter-regional transportation opportunities” to the policy is welcome. To better reflect all connections of the transportation system and connections to Mississauga and Caledon, the policy should also refer to inter-municipal opportunities.	The policy has been revised and the term <i>inter-municipal</i> has been added.
108.	3.2.5	It is unclear whether this sentence, and the policies that follow, apply only to Gateway Hubs. If the preamble sentence is intended to refer to Gateway Hubs, revise it so that it mentions these hubs.	This section refers generally to Mobility Hubs, and also addresses each of the anchor and gateway hubs. The preamble addresses both types of mobility hubs.
109.	3.2.6	Hurontario/Main Street is identified in the OPA as a “primary intensification corridor”. ROPA 24 and its associated Schedule D refer to a “conceptual regional intensification corridor” along part of Hurontario/Main Street in Brampton. It is unclear how these corridor designations are similar or dissimilar.	A new policy has been added to describe the significance of the Hurontario/Main Street corridor which is consistent with the Region’s identification of the corridor as a Regional Intensification Corridor.
Dufferin Peel Catholic District School Board (DPCDSB) - October 16, 2009			
110.		While the Board does not object to growth management practices, there may be areas in the City where the Board may have some concern with density increases that would lead to capital	The City’s Growth Management Program will continue to ensure that the provision of adequate schools, as well as other essential services and infrastructure remains a key consideration in the Secondary

#	Section	Comment	Staff Response
		improvements for existing school facilities. Generally, additional residential units in establishes school catchment areas are welcomed by the Board as they have the potential to maintain or increase student enrolments where enrolments are declining. It is a common trend in the Region however, that new higher-density forms of developments are not geared to families with school-aged children. New higher-density forms of development generate few students as proven in high-density nodes across the Region. The development of higher-density, family-oriented housing helps to create a wider range and mix of housing options. The proposed amendment seeks to optimize the use of existing and planned infrastructure and services however; the proposed amendment <i>does not address the impact of intensification on existing infrastructure and services</i> , such as schools. Should the expansion of schools be required to meet increased need, it is imperative that any expansions can be accommodated in a practical way despite how surrounding lands and infrastructure are used.	Planning, Block Planning and subdivision planning processes.
Korsiak & Company for Your Home (Howden) Developments Corp. – 9214 Dixie Road - December 3, 2009			
111.	3.2.2, 3.2.2.2	Revise to clearly state that there are <i>infill, redevelopment, Brownfield and greyfield sites</i> within the City that are also suitable for intensification; to comply with the City's and Province's definition of " <i>intensification area</i> ".	The intent of this policy is to describe the City's focus areas of intensification.
112.	3.2.2, 3.2.2.4	Application for 101 stacked townhouse units, with a proposed height of 3 storeys, FSI of 0.73 meets the intent of the residential intensification policies of the PPS. Confirmation is requested that the application meets the intent of 3.2.2.4 or request that the OPA identify the subject lands as being exempt from proposed new policies.	Processing of this application including consideration of compliance with this OPA will take place through the processing of the individual application.

[X Central Area and Urban Growth Centre](#)

#	Section	Comment	Staff Response
Gagnon Law – For Royalcliff Developments Inc. - September 29, 2009, RE: Feb 23 2009 Status Report			
113.		Appendix 1 of report includes a Plan illustrating Downtown Brampton and the limits of the Urban Growth Centre. We suggest that the Plan be revised to illustrate the location of the area in Downtown Brampton which is susceptible to major flooding and which as a result	The Central Area Secondary Plan contains detailed policies on the Special Policy Area.

#	Section	Comment	Staff Response
		may or may not be suitable for significant residential and/or employment intensification. We also suggest that this Plan be revised to indicate the adjacent land uses to that it will be easier to understand the relationship of the UGC to adjacent industrial areas and lower density residential precincts.	
114.		Appendix II includes a Plan illustrating the UGC and Intensification Opportunities. This Plan should be amended to illustrate the Downtown flood prone area(s), adjacent residential areas and the CNR Rail line.	The Central Area Secondary Plan contains detailed policies on the Special Policy Area.
Gagnon Law for Royalcliff Developments Inc. - October 5, 2009			
115.	X-1 through X-3	<p>There are policies pertaining to the Central Area. There is a stated objective of promoting the Central Area and UGC as the preferred location for business, shopping, living, dining...in the City of Brampton. The suggestion that this is a “preferred” location seems to mean that if these activities are located elsewhere, perhaps that this is not appropriate, or less than desirable. We do not believe that this is what you mean. Would it not be more appropriate to reference the Central Area and the UGC as an area where these uses are permitted?</p> <p>On a separate but related matter, has the municipality determined that transportation infrastructure available in this area of the City is capable of accommodating the high density employment uses the municipality is desirous of attracting?</p>	<p>The policy has been revised to note that the UGC is a prime location for business, shopping, living, dining, etc.</p> <p>The TTMP was done parallel to the Growth Plan conformity exercise and includes the vision for the UGC.</p>
Gagnon Law for RG's Group Inc. - October 5, 2009			
116.	X-1 through X-3	<p>There are policies pertaining to the Central Area. There is a stated objective of promoting the Central Area and UGC as the preferred location for business, shopping, living, dining...in the City of Brampton. The suggestion that this is a “preferred” location seems to mean that if these activities are located elsewhere, perhaps that this is not appropriate, or less than desirable. We do not believe that this is what you mean. Would it not be more appropriate to reference the Central Area and the UGC as an area where these uses are permitted?</p> <p>On a separate but related matter, has the municipality determined</p>	<p>The policy has been revised to note that the UGC is a prime location for business, shopping, living, dining, etc.</p> <p>The TTMP was done parallel to the Growth Plan conformity exercise and includes the vision for the UGC.</p>

#	Section	Comment	Staff Response
		that transportation infrastructure available in this area of the City is capable of accommodating the high density employment uses the municipality is desirous of attracting?	
Gagnon Law for Medallion Properties Inc., October 5, 2009			
117.	X-1 through X-3	<p>There are policies pertaining to the Central Area. There is a stated objective of promoting the Central Area and UGC as the preferred location for business, shopping, living, dining...in the City of Brampton. The suggestion that this is a “preferred” location seems to mean that if these activities are located elsewhere, perhaps that this is not appropriate, or less than desirable. We do not believe that this is what you mean. Would it not be more appropriate to reference the Central Area and the UGC as an area where these uses are permitted?</p> <p>On a separate but related matter, has the municipality determined that transportation infrastructure available in this area of the City is capable of accommodating the high density employment uses the municipality is desirous of attracting?</p>	<p>The policy has been revised to note that the UGC is a prime location for business, shopping, living, dining, etc.</p> <p>The TTMP was done parallel to the Growth Plan conformity exercise and includes the vision for the UGC.</p>
Gagnon Law – For 2077060 Ontario Inc. (Saberwood Homes), October 5, 2009			
118.	X-1 through X-3	<p>There are policies pertaining to the Central Area. There is a stated objective of promoting the Central Area and UGC as the preferred location for business, shopping, living, dining...in the City of Brampton. The suggestion that this is a “preferred” location seems to mean that if these activities are located elsewhere, perhaps that this is not appropriate, or less than desirable. We do not believe that this is what you mean. Would it not be more appropriate to reference the Central Area and the UGC as an area where these uses are permitted?</p> <p>On a separate but related matter, has the municipality determined that transportation infrastructure available in this area of the City is capable of accommodating the high density employment uses the municipality is desirous of attracting?</p>	<p>The policy has been revised to note that the UGC is a prime location for business, shopping, living, dining, etc.</p> <p>The TTMP was done parallel to the Growth Plan conformity exercise and includes the vision for the UGC.</p>
TRCA – October 21, 2009			
119.	X.X	We recommend including reference to promoting public safety in terms of hazard management to ensure consistency with the Growth	Section 4.5.15.5 has been created to consolidate appropriate references to natural hazards management to enhance the importance

#	Section	Comment	Staff Response
		Plan and PPS.	of these directions.
120.	X.X	<p>Proposed policies in the Official Plan reflect the UGC gross density target of 200 residents and jobs combined per hectare. However, this density target is a gross target for the entire UGC. An assessment of where within the UGC new development and increased density is appropriate has not been provided as part of the proposed amendments, and should be undertaken at this time. The current Official Plan has existing secondary plans to guide development within the UGC/Central Area. The development form and densities identified in the secondary plans will need to be reconciled with consideration for the new density targets. As part of this exercise, areas in which additional intensification may not be appropriate, such as the Downtown Brampton SPA, should be identified, such that the densities in other areas of the UGC can be targeted accordingly. To date it has not been established whether additional intensification within the Downtown SPA, which requires modifications to the existing OP and Zoning Bylaw designations, will be supported by the Province. In the absence of this assessment it is not possible for TRCA staff to determine whether the proposed amendments regarding gross density targets for the SPA areas of the UGC are consistent with the PPS.</p> <p>TRCA Staff welcome the continued cooperation of the City of Brampton in the further evaluation of the development potential of the Central Area through a comprehensive review and update of the Downtown Brampton Secondary Plan in accordance with the updated Provincial Special Policy Area guidelines. As the Central Area is vital to the social and economic function of Brampton, TRCA Staff recommend including a statement within the Central Area policies of the OP to recognize the importance of updating the secondary plans to guide development, with consideration for both UGC objectives and Provincial Policy requirements associate with natural hazards.</p>	<p>As part of the Growth Plan background work, an Intensification Study was undertaken to assess the City's ability to meet the Growth Plan objectives, which acknowledged the SPA.</p> <p>The City appreciates the collaborative effort that has been undertaken between the City, TRCA and Province to develop a comprehensive approach for development in the Central Area. A future review of all of the Secondary Plans will also be undertaken to comply with the City's Part 1 Official Plan, as amended by this OPA.</p>
121.	4.2.2.1 (X-2)	Should recognize that density targets must be achieved while remaining cognizant of provincial hazard land policies. The following should be added to the end of this policy: <i>"with consideration for public safety requirements with respect to flooding"</i>	The City understands the need to respect the hazard land policies and continues to provide and plan for the highest of public safety measures.

#	Section	Comment	Staff Response
Chris Bejnar – Member of Public, Email (Councillor. Gibson), December 12 2009			
122.		The City should look at revising the boundary around the PMH site and include the triangular section just south of the tracks. This is a “dead space” and could be used for office, residential, commercial, etc. A bridge (platform) over the tracks to link this site could be built.	This triangular section of land south of the rail line adjacent to the old Peel Memorial Hospital site is currently not within the Central Area or Urban Growth Centre. It is currently designated for parkland purposes in the Secondary Plan. Although there are no current short-term plans to develop this land as a part, it current provides connections to existing parkland to the west

4.2 Commercial

#	Section	Comment	Staff Response
Gagnon Law for Royalcliff Developments Inc. - October 5, 2009			
123.	4.2.2.9	Programs are referenced related to higher densities in the Central Area. Could you please summarize the programs and provide us with copies of the approved documents themselves.	This policy provides support for municipal actions for a broad range of matters. The Central Area Secondary Plan has policies that allow, subject to appropriate planning rationale, for higher densities than is already permitted in the Plan. The Downtown Community Improvement Plan offers financial incentives for intensification and the UGC and conformity exercise supports residential intensification in appropriate locations in the Central Area.
Gagnon Law for RG’s Group Inc. - October 5, 2009			
124.	4.2.2.9	Programs are referenced related to higher densities in the Central Area. Could you please summarize the programs and provide us with copies of the approved documents themselves.	This policy provides support for municipal actions for a broad range of matters. The Central Area Secondary Plan has policies that allow, subject to appropriate planning rationale, for higher densities than is already permitted in the Plan. The Downtown Community Improvement Plan offers financial incentives for intensification and the UGC and conformity exercise supports residential intensification in appropriate locations in the Central Area.
Gagnon Law for Medallion Properties Inc. - October 5, 2009			
125.	4.2.2.9	Programs are referenced related to higher densities in the Central Area. Could you please summarize the programs and provide us with copies of the approved documents themselves.	This policy provides support for municipal actions for a broad range of matters. The Central Area Secondary Plan has policies that allow, subject to appropriate planning rationale, for higher densities than is already permitted in the Plan. The Downtown Community Improvement Plan offers financial incentives for intensification and the UGC and conformity exercise supports residential intensification in appropriate locations in the Central Area.
Gagnon Law for 2077060 Ontario Inc. (Saberwood Homes) - October 5, 2009			
126.	4.2.2.9	Programs are referenced related to higher densities in the Central	This policy provides support for municipal actions for a broad range of

#	Section	Comment	Staff Response
		Area. Could you please summarize the programs and provide us with copies of the approved documents themselves.	matters. The Central Area Secondary Plan has policies that allow, subject to appropriate planning rationale, for higher densities than is already permitted in the Plan. The Downtown Community Improvement Plan offers financial incentives for intensification and the UGC and conformity exercise supports residential intensification in appropriate locations in the Central Area.
TRCA - October 21, 2009			
127.	4.2.1.5	To further Brampton's commitment to a ' <i>Sustainable City Structure</i> ' it appears as though there may be opportunity to strengthen this section in terms of green urban and building design for commercial developments. This objective has been clearly identified within the Retail Policies of the plan; however TRCA staff suggest promoting these policies into commercial development as a whole. In this regard, we suggest including a sentence, where appropriate, articulating the City's desire to further best management practices for commercial development in terms of waste reduction, and water, soil, air and energy conservation (i.e. green urban and building design, and promoting green development and LEED standards).	The policy has been revised to reflect best management practices for commercial development as well as promoting green development and LEED standards.

4.3 Employment

	Section	Comment	Staff Response
Candevcon Limited for Parkmount Building Corporation and Canadian Tire - June 10, 2009			
128.		With respect to the Vales North Special Study Area, Candevcon submits that this area only has limited opportunities for industrial uses but provides significant opportunities for commercial uses.	As per Council's direction of Feb 10 th 2010, the amendment incorporates a Special Study Area to guide the Secondary Plan in ensuring an appropriate mix of employment and commercial uses within this area. In addition, the area is recommended to be designated Business Corridor.
Owners of Land adjacent to Clarkway Drive (Secondary Plan Area 47) - October 5, 2009			
129.		We understand that the City is looking at changing the use of our lands from residential to industrial. This is of great concern to us since we have lived in this area for many years and we do not want to have industrial uses near our property which will devalue our property. We thought that the limit of the industrial lands had been finalized years ago when the Official Plan was prepared. We want to tell you that we strongly object to industrial uses being expanded to Clarkway Drive.	As per Council direction received on Feb 10 th 2010, roughly 110 ha of designated residential land east of Clarkway Drive in SPA 47 are part of a Special Study Area identified to assess the viability of industrial lands within SPA 47 in the context of considering the City-wide need for employment lands.

	Section	Comment	Staff Response
Sam Del Giudice, 10599 Clarkway Drive - October 5, 2009			
130.		Mr. Del Giudice commented that the City is proposing to amend the Official Plan to extend the boundary of the industrial lands to Clarkway Drive and was concerned about the impact on the residents who live adjacent to Clarkway Drive in Area 47. He stated that this issue existed 17 years ago and it was resolved by the creation of buffer zones between the residents and the industrial lands. He submitted a petition for the area residents who are opposed to the proposal (see submission above).	As per Council direction received on Feb 10 th 2010, roughly 110 ha of designated residential land east of Clarkway Drive in SPA 47 are part of a Special Study Area identified to assess the viability of industrial lands within SPA 47 in the context of considering the City-wide need for employment lands
Jan Seyfried, 10955 Clarkway Drive - October 5, 2009			
131.		Mr. Seyfried inquired when the City was made aware that the Province wanted the industrial lands to be extended to Clarkway Drive, and why the area residents weren't made aware of this. He was concerned that if the zoning designation is changed to industrial, the value of the properties in the area would be reduced and he was especially concerned, as his home is designated as a heritage property. He stated that residents should be allowed to voice their concerns.	As per Council direction received on Feb 10 th 2010, roughly 110 ha of designated residential land east of Clarkway Drive in SPA 47 are part of a Special Study Area identified to assess the viability of industrial lands within SPA 47 in the context of considering the City-wide need for employment lands
Gagnon Law for the North West Brampton Landowners Group - October 5, 2009			
132.		The NWBLG have been working closely with the Staff at the City on understanding City-wide population, household and employment forecasts to the year 2031. It is critical that the locational attributes of North West Brampton be understood as they relate to what can reasonably be accommodated within the planning period, affording due consideration to infrastructure which will be available to accommodate development. The NWBLG is committed to assisting in the provision of employment opportunities commensurate with what is reasonably achievable given the location of these lands.	Both the Hemson and Cushman and Wakefield Reports specifically the reviewed the locational attributes in NW Brampton with respect to its suitability to accommodate employment growth. Following Council's consideration of both these studies at the Feb 10 th 2010 Council Meeting, it was determined that a portion of employment would have to be designated on newly designated lands through the City's five year Official Plan Review and secondary planning processes, including Secondary Plans 52 and 53.
133.		The Market Demand and Development Feasibility Study will help inform the viability of long term employment forecasts, employment land area allocations, employment locational attributes and criteria, the importance of planned infrastructure, the marketability of candidate employment areas and hopefully the maximization of opportunities for employment within Brampton's existing industrial heartland which is focused on Highway 410, 407, 427 and the emerging Bram East, Bram West employment areas.	Both the Hemson and Cushman and Wakefield Reports looked specifically the locational attributes in NW Brampton with respect to its suitability to accommodate employment growth. Following Council's consideration of both these studies at the Feb 10 th 2010 Council Meeting, it was determined that a portion of employment would have to be designated on newly designated lands through the City's five year Official Plan Review and secondary planning processes, including Secondary Plans 52 and 53.

	Section	Comment	Staff Response
134.		The NWBLG is appreciative of the need for the municipality to maintain an adequate supply of employment lands on a City-wide basis. Equally important, employment lands need to be properly located, lest they fail to perform their intended role. The <i>Market Demand and Development Feasibility Study</i> , which is currently underway, will provide input into the draft Official Plan amendment related to the refinement of employment land policies. This may or may not include specific policies relating to the future of North West Brampton.	Both the Hemson and Cushman and Wakefield Reports looked specifically the locational attributes in NW Brampton with respect to its suitability to accommodate employment growth. Following Council's consideration of both these studies at the Feb 10 th 2010 Council Meeting, it was determined that a portion of employment would have to be designated on newly designated lands through the City's five year Official Plan Review and secondary planning processes, including Secondary Plans 52 sand 53.
TRCA - October 21, 2009			
135.	4.3.2.6	<p>Please update the Secondary Plan section to implement Brampton's continued commitment to supporting and facilitating sustainability in employment lands by paying attention to design issues that can be implemented at the secondary plan stage such as:</p> <ul style="list-style-type: none"> • Efficient road & right-of-way design: avoid "bigger is better" when not required for turning radius and safety • Energy efficient site layout: solar orientation, buildings sheltered from prevailing winter winds. • Parcelization: diversity in parcel sizes and business types to increase feasibility of eco-industrial activity • Multi-modal transportation network: design for safe movement of trucks, vehicles, transit, pedestrian, bikes • Integration of ecological features and functions • Integrated infrastructure in Right-of-ways and Utility right-of-ways • Opportunities for district energy and renewable energy technologies 	Section 5.0 of the Official Plan outlines the key elements of what is incorporated into the City's Secondary Plans. Within these provisions are specific requirements for areas which are predominantly industrial or commercial.
136.	4.3.2.18	Further to our recommendation on the Region of Peel's Official Plan update please include a requirement to submit a sustainable design brief as part of development approvals process for industrial lands. We recommend adding the following to the end of I): <i>"including the submission of a sustainable design brief with Planning Act applications for new development"</i>	The Official Plan currently contains policies requiring the submission of Design Briefs which must include the consideration of sustainability elements (section 4.10).
137.	4.3.8	TRCA staff commend the City of Brampton on their support and leadership in the area of promoting sustainable commercial development.	Comment acknowledged.

	Section	Comment	Staff Response
Sam Del Guidice (Area 47 Landowner) - December 7, 2009, Special Council Meeting			
138.		Object to the rumoured recommendation in the <i>Market Demand and Development Feasibility Study</i> which considers the area east of Clarkway Dr as <i>industrial</i> . This area was designated residential in 1997. Industrial use would lessen property values. Over 1,500 acres are currently designated for employment lands in the SPA 47, although it is 10km from Hwy 407 therefore not accessible.	As per Council direction received on Feb 10 th 2010, roughly 110 ha of designated residential land east of Clarkway Drive in SPA 47 are part of a Special Study Area identified to assess the viability of industrial lands within SPA 47 in the context of considering the City-wide need for employment lands
Gagnon Law for the North West Brampton Landowners Group - February 1, 2010, RE: Feb 1 2010 Rec. Report			
139.		Support City staff in that: <ul style="list-style-type: none"> the detailed location of employment land within NW Brampton be determined through the Secondary Planning processes for SPA 52 and 53 discouraging low density employment uses such as logistics and warehousing during secondary planning processes will encourage higher density employment 	Comment acknowledged.
140.		Brampton should strive to attract as broad a range as possible of employment types within both existing and new employment land areas to capture as many jobs as possible, otherwise Brampton may not realize its full potential for creating jobs.	The city needs to ensure that all employment types are planned to satisfy a diverse range of employment needs.
141.		The <i>market oriented approach</i> , being undertaken by Brampton, should be applied all over Brampton and not just in NE or NW Brampton.	Council's direction of Feb 10 th 2010 takes into account both employment land studies which apply to the whole of Brampton.
142.		Brampton's most desirable employment lands are those which are located in immediate proximity to Hwys 407, 410 and 427, the rail intermodal yards and close to Pearson International Airport.	Following Council's consideration of both these studies at the Feb 10 th 2010 Council Meeting, it was determined that additional employment lands within NW Brampton are to be strategically positioned adjacent to future transportation and transit infrastructure.
143.		Support the Cushman & Wakefield approach to identifying additional employment of a combination of industrial, major office and population-related jobs, however differ in where these jobs will be found in the future. Encourage the municipality to pursue higher order office and population related employment, as opposed to focusing too heavily on more traditional industrial type employment.	Both studies acknowledge that there is some portion of non-employment land in designated employment lands, however employment land employment needs to be the primary use in these areas given that there are many other locations that can serve the employment population growth.
144.		As the detailed background studies in support of the future Heritage Heights Community (SP 52 and 53) have not been commissioned, it is premature to suggest that approximately 330 to 440 net hectares of employment land could be accommodated in NW Brampton.	The City Council directed staff to accommodate appropriate levels of employment growth through secondary planning policies as per its February 10 th 2010 Council Resolution.

	Section	Comment	Staff Response
		Given that the report concluded the City requires between 1 and 233 additional ha using a ' <i>bottom up</i> ' approach or a total of 99.4 to 442.3 ha of additional employment lands to 2031, the report is suggesting oversupplying the City with employment lands if the recommendation for NW Brampton is taken into context.	
145.		<p>Premature (the NSTC/TTMP EA Study is ongoing) to suggest that the most suitable location for employment lands within NW Brampton would be within SPA 52, specifically south of the CN Rail corridor. These lands do not have good access to Highways 407 and 401.</p> <p>When the NTSC is built, NW Brampton will still be no less than 6 – 7km far from Hwy 407 and 401. Although the report indicated that not all industries require good hwy access and that a 6 to 8km distance was reasonable, no successful example was provided.</p>	The City Council directed staff to accommodate appropriate levels of employment growth through secondary planning policies as per its February 10 th 2010 Council Resolution.
146.		Differ from Hemson view (<i>creative or talent economies</i>) in that future intensification will play a very important role in accommodating future employment.	The secondary planning processes designed to plan to accommodate City-wide employment growth will take into account the existing supply of employment land.
147.		Higher order employment types will lead to corresponding higher numbers of employees per hectare. The <i>industrial heartland</i> (close to 400-series highways, rail intermodal yard and PIA) will play a significant role in providing future employment.	City Council directed staff to encourage higher density, higher order employment uses within NW Brampton and as part of the secondary planning for SPA 47 as per its February 10 th 2010 Council Resolution.
148.		Vacant land located in the existing City of Brampton business parks are best suited in the short to medium term to accommodate employment demand and have the best chance at long term success.	There is some limited opportunity available in existing employment land areas. Studies will need to demonstrate how much planned employment growth can be accommodated on these lands.
149.		Schedules in the Cushman & Wakefield report show that there are other lands located elsewhere in the City of Brampton which are better suited to successfully accommodate <i>employment land employment</i> – lands which are located immediately adjacent to, or in close proximity to existing and/or planned 400-series hwy, PIA, rail intermodal yards and other major employment districts in Mississauga and Vaughan.	There are existing vacant employment lands within the City that are located in the vicinity of 400 series highways which can accommodate some employment growth. In addition, as per direction from City Council in February 2010, approximately 70,000 to 90,000 jobs will need to be accommodated on newly designated and existing vacant employment lands.
150.		Encourage City of Brampton to be cognizant of the need to assess employment opportunities in the City of Brampton in a GTA-Wide competitive context. The NW Brampton area is not served by any major highways, rail inter-modal yards, nor a planned 400-series	The City Council directed staff to accommodate appropriate levels of employment growth through secondary planning policies as per its February 10 th 2010 Council Resolution.

	Section	Comment	Staff Response
		highway.	
151.		<p>Changes to Staff Recommendations:</p> <ul style="list-style-type: none"> • 3: ii): <i>revise to acknowledge and reference the role and function of vacant land and existing buildings, as well as the importance of office along with service, retail and institutional uses in meeting future employment demand.</i> • 3 iii): <i>revise to delete specific references to SP Areas, as it is premature to single out SPA 47, 52 and 53 until the Secondary Plans are prepared</i> • 3 vi): <i>Revise to reference the designated residential lands in SPA 47 as a Special Study Area</i> 	On Feb 10 th 2010 Council made recommendations arising from the Staff Report and background employment land studies related to these matters.
Sierra Club Canada - Feb 11, 2010, RE: Feb 1 2010 Rec Report			
152.		Highest priority should be given to leaving Natural Heritage Systems intact and in their natural state. Given the intensification opportunities through Places to Grow, this is achievable and necessary in serving the dense population that intensification brings.	The Growth Plan and City's official Plan Amendment have policy direction to direct development outside of Natural Heritage Systems.
153.		It is important that industrial and other high impact uses be located far away from Natural Areas and that the demarcation line of buffer zones between natural areas and the lot line of any development lands be at least 30 metres. The present standard of 10 metres often has buffer zones extending into the natural area; the net result is an inadequate five metre buffer zone.	The buffer policies indicate that 10m is the general minimum buffer; however, environmental studies may recommend greater buffers depending on the environmental features, functions and linkages of the natural area. Within the environmental study we may ask for an examination of issues and/or impacts that may be associated with industrial uses that could be of impact to the health of a natural area (e.g. light, noise, emissions, etc.) and then, the findings of the study will inform the application of buffers.

4.4 Transportation

#	Section	Comment	Staff Response
Gagnon Law for Royalcliff Developments Inc. - September 29, 2009, RE: Feb 23 2009 Status Report			
154.		The City's TTMP is currently being updated. We believe that it should include specific policies and references to infrastructure to maximize the role and function of the transit facilities which existing in the Heart Lake Town Centre Area. The existing "Heart Lake Terminal Transit Facility" located on Conestoga Drive facilitates the transit needs of the Heart Lake community and is services by no less than 7 transit lines. It is one of only 7 similar such facilities in the City. We	The final TTMP does not propose any changes to the role and function of the Heart Lake Town Centre Terminal.

#	Section	Comment	Staff Response
		encourage the city of increase maximum densities and building heights in all areas of the city which include transit supportive infrastructure; including the Heart Lake Town Centre area.	
155.		Maximizing the use of the “Heart Lake Terminal Transit Facilities” supports the goals and objectives of the Growth Plan. This transit facility represents an opportunity to enhance transit accessibility for local residents and employees.	The final TTMP does not propose any changes to the role and function of the Heart Lake Town Centre Terminal.
Gagnon Law for the North West Brampton Landowners Group - October 5, 2009			
156.		The report speaks of the draft TTMP. The draft Official Plan amendment incorporates additional policies in these areas in conjunction with the recommendations of the draft final TTMP. The draft final TTMP identified a preferred alternative or the North South corridor as a “Super Arterial” beginning south of Highway 407 ETR, ending at Mayfield Road. We are concerned that further study through the HPBATS could include a “Freeway option” on the basis that our landowners’ transportation consultant does not believe that a “freeway option” is required to service the full build out of NWB.	<p>The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study were considered by Planning Design and Development Committee on April 19th 2010. The report supports the need for a Halton-Peel freeway option and directs area municipalities to protect the corridor for that freeway.</p> <p>Full development of NW Brampton requires a higher-order transportation corridor satisfied by the freeway option.</p>
157.	4.4.2.16	There is a reference to a higher order transportation corridor in NWB being the NSTC. The policy suggests that the jurisdiction for this road should ultimately reside with the Region of Peel or the Province of Ontario. Historically the consultants to NWBLG have been of the opinion that the NSTC should be a Regional facility; that portion up to Sandalwood Parkway is included in the Regional DC By-law. The portion from Sandalwood Parkway to Mayfield Road is to be included in the City DC By-law; with the intent that it too be included in the Regional DC By-law. We suggest that references to the Province of Ontario be deleted on the basis that this facility has been accounted for already. Further, in the context of the GTA, the Province of Ontario would only assume responsibility for 400 series highways. No work has been done to suggest or support this scale of transportation infrastructure is required.	<p>The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study (HPBATS) supports the need for a Halton-Peel freeway option.</p> <p>The Province, through the GTA West Environmental Assessment (EA), has been involved in the HPBATS, and further given the potential for significant impact on long-term land use, the Province has requested that all ministries be notified and/or involved in all Official Plan amendments, secondary plans/block plans, etc., within NE Brampton, NW Brampton, and Bramwest Secondary Plan Area.</p>
158.	4.4.7.8	There is reference made to high order goods movement as a means of supporting future employment areas. While the NWBLG are supportive of a proper and appropriate transportation network, we wish to affirm our opinion that the envisaged network will not be sufficient to support a large scale “employment area’ rivaling the	Following Council’s consideration of both these studies at the Feb 10 th 2010 Council Meeting, it was determined that additional employment lands within NW Brampton are to be strategically positioned adjacent to future transportation and transit infrastructure.

#	Section	Comment	Staff Response
		Brampton industrial heartland or Bram East and Bram West areas which are much better suited for employment purposes due to their proximity to Highway network, intermodal rail facilities and Pearson International Airport.	
Town of Halton Hills - October 16, 2009			
159.	Sched B, B1	The proposed Brampton Growth Plan Official Plan amendment, which is indicating a preferred route for a North-South Corridor including a linkage into Halton Hills, in advance of completion of the HPBATS including consideration of a possible east-west connection, is not appropriate at this time. The revisions proposed to Schedules B and B1, related to the conceptual transportation corridor extending from North West Brampton into the Town of Halton Hills by Embleton Road and all proposed policies and policy revisions related to the North-South Corridor and North-South Corridor Protection Area are premature at this time and should be dealt with through the HPBATS process.	The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study were considered by Planning Design and Development Committee on April 19 th 2010. The report supports the need for a Halton-Peel freeway option and directs area municipalities to protect the corridor for that freeway.
Halton Region - October 16, 2009			
160.	3.2.9, Sched B, B1, 4.4.2.16	We note that a corridor protection area has been identified in the proposed Draft Official Plan amendment (Policy 3.2.9) and its schedules (B and B1) showing the North-South Transportation Corridor extending into Halton Region, as well as a new policy which addresses the Corridor's implementation and operations (Policy 4.4.2.16). We believe that it is premature at this time to suggest a preferred solution with the HPBATS study is ongoing in inconclusive.	The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study were considered by Planning Design and Development Committee on April 19 th 2010. The report supports the need for a Halton-Peel freeway option and directs area municipalities to protect the corridor for that freeway.
TRCA - October 21, 2009			
161.	4.4, Sched B	It is noted that road improvements and widening will be undertaken in accordance with the EA Act for all roads and links under various jurisdictions as presented in Schedule B. New road networks should be shown conceptually on these maps, as any newly proposed road link or widening will need to be assessed through the Municipal Class EA process. It is at that time that alternative solutions and the feasibility of these locations will be determined. Please included stronger wording within this section that speaks to the intricate relationship between <i>"environmental health, the natural heritage system and physical form"</i> .	As per Official Plan policy 4.4 (xi), these will be considered as part of the Environmental Assessment process. We look forward to the TRCA's comments with respect to environmental health, the natural heritage system and physical form, on specific EA's.

#	Section	Comment	Staff Response
162.	4.4.2 (d)	Please revised objective (d) to better highlight considerations for natural heritage and natural hazard <i>“associated structure, including green infrastructure consideration of natural heritage features, valley corridors, areas susceptible to high flood levels, watercourse features and stormwater management practices...”</i>	New policies have been added to Section 4.4 (Transportation System) to have regard for natural heritage features.
163.	4.4.1.6	Please include a separate policy that speaks to how the City will consider impacts to existing natural features, including terrestrial natural heritage systems, conservation lands and watercourses, as part of the planning and construction of transportation facilities in Brampton. The City should also work with agencies to mitigate impacts to the natural environment and avoid adverse impacts, to the extent possible.	Policy 4.4.1.7 states that the planning and construction of all elements of the transportation system are consistent with the policies in Section 4.5 (Natural Heritage and Environmental Management); where the City proactively seeks collaboration with conservation groups and other agencies. Further, Policy 4.4.10.5 (Adverse impacts) states that all components of the transportation system will be planned, designed and constructed so as to avoid/minimize/mitigate the adverse impact on natural heritage features, functions and linkages, including natural hazard management and cultural heritage resources.
164.	4.4.2	Please ensure that it is clearly documented in the update that the new roads need to be reviewed, assessed and approved through the Municipal Class EA process (or other relevant planning related process) as the road alignments cannot be predetermined before impacts to cultural and natural heritage features etc. are determined and assessed.	Policy 4.4.2.1 (xi) states that all road improvements and widenings proposed in Schedule “B” are subject to and in accordance with the Environmental Assessment Act. The EA Act requires that a description of the expected range of environmental effects and measures to mitigate those effects be included as part of the Municipal Class EA.
165.	4.4.2.12	Should also indicate that road projects may also need to be approved through the Municipal Class EA process.	Policy 4.4.2.1 (xi) states that all road improvements and widenings proposed in Schedule “B” are subject to and in accordance with the Environmental Assessment Act. The EA Act requires that a description of the expected range of environmental effects and measures to mitigate those effects be included as part of the Municipal Class EA.
166.	4.4.2.21	Please note that the City will need to work with TRCA in the monitoring and planning of roads within our jurisdiction.	The TRCA has been added to this policy and will continue to work with the City to monitor and plan roads within its jurisdiction.
167.	4.4.3	Please revise objective b) to read <i>“mitigating transportation related pollution, impacts to natural features and to reduce dependency...”</i>	The policy has been revised to include impacts to natural features.
Region of Peel - October 29, 2009			
168.	4.4	Given our role as the upper tier municipality for Brampton and our joint efforts on a number of issues, the Region of Peel should be specifically mentioned Section 4.4 objective (e).	The policy has been revised to clearly state the Region of Peel.
169.	4.4.1.3	The Region may have a role in designating future facilities, but likely will not have a role in protecting for such facilities. The Region can take supportive measures and encourage others to protect the land	The Growth Plan states that the Province and municipalities will ensure that corridors are identified and protected to meet current and project needs for various travel modes. This policy has been revised to

#	Section	Comment	Staff Response
		<p>for future facilities, but cannot take the ultimate step of protecting the land. This policy also raises the question of whether municipalities or the Province can protect for future facilities prior to such facilities having been designated through environmental assessments.</p> <p>Replace the second instance of the word “<i>encourage</i>” in the policy with “<i>work with</i>” (“...and work with others such as the Region and the Province to designate and protect for future facilities”). (Or some comparable wording). Consider using alternative wording for the term “protect” (In ROPA 22 we used wording along the lines of “take appropriate actions to ensure that these corridors are not precluded”)</p>	<p>reflect that the City will work with the Region and Province to identify and protect future facilities.</p>
170.	4.4.2.2 ii)	<p>Regional Roads may be planned, designed, constructed and designated to carry medium...with transit services through HOV lanes, dedicated transit lanes or other transit priority measures. This may not be the case for all Regional roads, may be decided on a case-by-case basis and may depend on the outcome of future studies (such as a feasibility study of arterial HOV lanes).</p> <p>Revise the policy to note that features on major arterial roads that support transit services will be provided where appropriate. Possible revised wording: “<i>Major arterials under the jurisdiction of either the Region of Peel or the City are to be planned, designed, constructed and designated to carry medium distance intra-regional traffic at medium speeds and to serve traffic flows between the principal areas of traffic generation, as well as traffic to or from freeways. The arterials will be designed with a high degree of access control to the abutting properties. Arterial roads should be continuous and able to accommodate direct transit routes and transit priority measures with appropriate street furniture including sidewalks where appropriate. Provision will be made for transit services – through High Occupancy Vehicle (HOV) lanes or other transit priority measures – where appropriate.</i>”</p>	<p>The policy has been revised to reflect that features on arterial roads will be provided where appropriate.</p>
171.	4.4.2.14	<p>The Highway 50/Highway 427 Area Arterial Network Study is complete. It is a minor grammatical concern, but is the use of the</p>	<p>The policy has been revised to reflect the completion of the study and the network requirements being determined by the joint Hwy 50/427</p>

#	Section	Comment	Staff Response
		<p>word “<i>is</i>” in the final sentence appropriate?</p> <p>Consider revising the policy to state that the ultimate network requirements “<i>have been</i>” determined by the Study rather than “<i>is</i>” determined.</p>	study.
172.	4.4.2.16	The HP-BATS study will define the need for, role and function of a North-South Transportation Corridor. This policy appears to prejudge the outcome of the HP-BATS study and/or any follow-up studies and as such is premature. Delete the policy or do a major revision to note that the ongoing study will identify need, role, function and jurisdiction of any potential corridor.	The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study were considered by Planning Design and Development Committee on April 19 th 2010. The report supports the need for a Halton-Peel freeway option and directs area municipalities to protect the corridor for that freeway.
173.	4.4.3 4.4.3.13	The policies in this section focus on TSM measures (physical, technological and operational measures). The policies related to TDM (incentives, programs, funding, etc) are comparatively weak. Strengthen policy 4.4.3.13 (go beyond “ <i>support</i> ” for an awareness and marketing campaign) and/or add additional policies on TDM programs, etc. to accompany the TSM improvements.	The City continues to participate and support the Smart Commute Program and will continue working with the Region of Peel, MTO, Metrolinx, Transportation Canada and other jurisdictions for joint TDM implementation Programs.
174.	4.4.3.11	<p>We support the idea of Brampton establishing financial strategies, but the policy appears to presume that there will be a Region-wide HOV system. Given that ROPA 22 policy 5.9.4.2.13 only calls for a feasibility study of an arterial HOV network, a Region-wide arterial HOV system cannot be taken for granted.</p> <p>Revise the policy to refer to “<i>a potential Region-wide arterial HOV system</i>” (or some comparable wording to imply uncertainty as to the development and implementation of such a system).</p>	This policy has been revised to reflect the potential HOV system.
175.	4.4.4.4	<p>The encouraging of the use of low floor accessibility transit vehicles is welcome as it aligns well with ROPA 22 policy 5.9.11.2.5. Could this policy be expanded to include “<i>community transit service corridors</i>” and thereby cover all transit routes in Brampton?</p> <p>Consider revising the policy to include “<i>community transit service corridors</i>” in the second sentence (or refer to “all transit corridors”)</p>	The policy has been revised to remove any reference to specific locations of transit service.
176.	4.4.4.7, 5.2, Sched C	<p>The term “higher order transit” is not defined in Section 5.2 (definitions) of the OPA nor used in Schedule C (Transit Network). Add the term “<i>higher order transit</i>” to the definition section of the</p>	The definition of Higher Order Transit, as per the Growth Plan, has been added to Section 5.2 of the Official Plan.

#	Section	Comment	Staff Response
		OPA.	
177.	4.4.4.30 4.4.4.32	Metrolinx and GO Transit have merged. <i>Revise the policies to refer to Metrolinx instead of GO Transit.</i>	References to GO Transit in the Official Plan have been changed to Metrolinx, where appropriate.
178.	4.4.5	Preamble - The focus on transit objectives in the preamble sentence might be too limited as other objectives of the Plan may have bearing on parking management. <i>Consider revising the preamble sentence to include the objectives mentioned in Objective (b) of this section.</i>	The preamble has been revised to recognize the transit objectives.
179.	4.4.6	Preamble- Along with bicycle paths, multi-purpose lanes can be integrated into rights-of-way. This would cover a broader spectrum of active transportation uses in the rights-of-way. The Region is currently working, in conjunction with the area municipalities, on an active transportation plan. Broaden this sentence in the preamble to include multi-purpose paths (“...integration of bicycle lanes and multi-purpose paths into...”). <i>Revise the preamble to note that the City and Region are working together on this.</i>	Multi-use pathways have been added into the preamble.
180.	4.4.6.2, 4.4.6.3	The two policies use common introductory sentences and appear to address similar issues. <i>Consider merging the two policies.</i>	These policies have been merged.
181.	4.4.7.2	In a comparable policy in ROPA 22 (5.9.7.2.4) we decapitalized “strategic goods movement network” so as not to imply a specific name for a study. <i>Consider revising the policy to refer to a “strategic goods movement network” (lower case).</i>	This policy has been revised as noted.
182.	4.4.7.8	Is the high order goods movement network called for in this policy the same as the North-South Transportation Corridor? If not, what is being called for in this policy? The policy appears to presume that the GTA West Corridor will be built. Given that the environmental assessment for the corridor has not formally identified the need for a corridor or what shape such a corridor might take, should this policy be modified to talk about a potential GTA West Corridor? <i>This policy should be reworded to call for the “identification and construction” of a corridor rather than the “construction and identification”.</i> <i>We request clarification on the intent of the goods movement corridor and its possible relation to the North South Transportation Corridor. We may have further comments pending receipt of the</i>	The North-South Transportation Corridor is intended to be a multi-modal facility supporting the travel needs of all users, including goods movement activity. The policy now refers to the GTA West Corridor as a potential future corridor. The policy has been reworded to call for the “identification and construction”.

#	Section	Comment	Staff Response
		<i>clarifying information.</i>	

4.5 Natural Heritage and Environmental Management

#	Section	Comment	Staff Response
Gagnon Law for the North West Brampton Landowners Group - October 5, 2009			
183.	Sched D	We recommend against finalizing this Schedule as it relates to NWB until such time as the Subwatershed Study which is being prepared for the Mount Pleasant Secondary Plan is finalized. We further suggest that any environmental features being added to the Schedule which do not already exist in the City's approved Official Plan be deleted until the Subwatershed Study is commenced and approved for the area commonly referred to as the Heritage Heights Community. This comment regarding the identification of environmental features applies to all Official Plan Schedules which are being amended through this Official Plan amendment. It would be appropriate to advance Secondary Planning in the whole of NWB as a means of advancing the study and analysis of Natural Heritage Features.	The modifications to Schedule D and other Schedules which illustrate the City's natural heritage system do not propose modifications to any natural heritage features within North West Brampton. Any components of the natural heritage system shown within North West Brampton on Schedule D are currently part of the 2006 Official Plan.
TRCA - October 21, 2009			
184.	4.5, 4.5.15	For clarity and to be more consistent with Provincial and Regional policies, we recommend that specific references to natural hazard policies be removed from this section and implemented into a new (sub)section titled ' <i>Natural Hazards</i> ' under section 4.5.15 – Protecting Public Health and Safety . In this regard, <i>references to (Provincial) SPAs and other natural hazards such as flooding and erosion should be incorporated into this new section.</i>	Natural hazard policies contained in Sec. 4.5.7 (within valley and watercourse corridors) have been removed and placed in Sec. 4.5.15.5, Natural Hazards.
185.	4.5.6, 4.5.10	TRCA's Target Natural Heritage System Strategy (TNHSS) and CVC's TEEM has been discussed within Section 4.5.10 of this Plan. Please note that TRCA's TNHSS does not necessarily identify features that would meet the PPS definition of ' <i>significant</i> ' but rather identifies a network of natural areas needed for a healthy functioning ecosystem and sets priorities for protection and restoration. TRCA Staff recommend moving paragraph 2 of section 4.5.10 into this section to complement Brampton's existing policies on the Natural Heritage System. In addition, in order to be consistent with the policies of this section, TRCA staff recommend that a statement is	<p>The second paragraph from Sec. 4.5.10 has been deleted and incorporated into Sec. 4.5.6. This section has been revised to delete 'significant' and includes 'a network of natural areas needed for a healthy functioning ecosystem, and sets priorities for protection and restoration'. Also have added statements to support an Urban terrestrial ecosystem enhancement model.</p> <p>Policy 4.5.6.2 has been added and indicates the City to develop environmental strategies, programs and models in conjunction with the conservation agencies.</p>

#	Section	Comment	Staff Response
		added to this section identifying TNHSS as a “ <i>Natural Heritage System Study</i> ” should that be the intent of the policy.	
186.		<i>Please include a schedule identifying lands within the TNHSS. This schedule should be a living document that can be updated without an amendment to the OP as further field study is required to refine the limits of the natural features, delineate opportunities for linkage and restoration and to identify particularly sensitive areas.</i>	The TNHSS only addresses TRCA’s jurisdiction, and a comparable NSS is not available within CVC’s jurisdiction.
187.		<i>Please add a policy to indicate that when a proposed development is within or adjacent to lands identified by the Natural Heritage System Study, and EIS may be required to assess impacts to natural features and their functions and to assess opportunities for restoration and to enhance natural linkages.</i>	Sec. 4.5.6.3 indicates the full extent of environmental studies (from watershed to EIR/EIS and natural heritage system studies) to define the extent of the natural heritage system. Sec. 4.5.6.4 has been added to review development adjacent to the natural heritage system.
188.	4.5.6.3	In order to better illustrate Brampton’s holistic and sustainable approach to planning please consider the following. “ <i>Where a Natural Heritage System Study is required, a concurrent analysis of the feasibility of implementing the recommendations of the Natural Heritage System Study should be undertaken.</i> ”	Policy 4.5.6.5 includes this direction.
189.	4.5.7	<p>Please be advised that the on-line ponds in Chinguacousy Park are located within TRCA’s jurisdiction of the Etobicoke Creek Watershed rather than Spring Creek as indicated (page 4.5-20 paragraph 2).</p> <p>The TRCA generally does not advocate for new stormwater management and/or golf course facilities to be located within valley and stream corridors with consideration for long term maintenance and ecological protection. Considering the above, and to be consistent with Policy 4.5.3.5 under the Stormwater Management section of this plan, <i>please remove new stormwater management facilities from the list of permitted uses</i> within these features (page 4.5-21 3rd paragraph). In addition we recommend revising page 4.5-21, 3rd paragraph to read “<i>permitted uses may include....golf courses</i></p>	<p>This correction has been made.</p> <p>This paragraph has been revised to clearly indicate that permitted uses include ‘existing stormwater management facilities and golf courses’.</p> <p>Also, additional clarification provided in Sec. 4.5.7.1 (ii) in that “Expansions and/or modifications of existing development and uses shall be reviewed in consideration of the identified hazards as defined in Policy 4.5.15.5; confirmation that there will be no negative impacts on the natural features or their ecological functions within the valley and watercourse corridors; and with regard to City policies and</p>

#	Section	Comment	Staff Response
		<i>where appropriate"</i>	standards/policies of the relevant Conservation Authority".
190.	4.5.10	We recommend removing the TRCA's TNHSS from the Significant Area section and locating it elsewhere in the Plan as TNHSS as a whole may not be consistent with the PPS definition of a Significant Area.	This has been removed from Sec. 4.5.10 as recommended and incorporated into Sec. 4.5.6.
191.	4.5.13	In order to be consistent with the policies of this section and policies of TRCA we recommend that paragraph 4 on page 4.5-33 is amended as follows: <i>"In this regard the City of Brampton may require a minimum buffer of 10m from natural features...unless the results of environmental studies indicated that a buffer of up to 10m is warranted..."</i>	Changes incorporated to recognize 'general requirements for a minimum 10 m buffer unless the results of an environmental study indicate that a buffer of up and/or in excess of 10 metres is warranted'.
192.	4.5.13.7	Please note that a 0.3m vertical buffer from a flood hazard may not be appropriate in all situations. As such, TRCA staff recommends amending the policy as follows: <i>"Appropriate vertical buffers should be provided from the Regional Storm Floodplain to the satisfaction of the City of Brampton and the conservation authority."</i>	Policy. 4.5.13.7 (vi) has been revised to indicate 'vertical buffer/freeboard between the Regional Storm floodplain and the elevation of the future block/lot as determined in consultation with the area Conservation Authority'.
193.	4.5.15	We suggest that this subsection be inserted under the heading of 'Natural Hazards' within subsection 4.5.15 'Protecting Public Health and Safety'. Additionally we suggest further clarifying the definition of a <i>Provincial SPA</i> . In this regard, the text found in the definition section of the PPS should be included for consistency. Please not that although it appears as though there are numerous Provincial SPAs within Brampton, there are only 3 approved Provincial SPAs in Brampton – the Brampton Central Core (includes the flood susceptible areas south of Clarence Street, in the vicinity of Meadowland and Nanwood Drive), and Avondale (includes certain developed flood susceptible areas north of Steeles Avenue and east of Dixie Road) SPAs.	The referenced subsection has been relocated to Natural Hazards 4.5.15.5, as suggested.
194.	4.5.7.2	Please clarify that where there is a Two Zone or Special Policy Area, the Secondary Plan shall identify the provincially approved SPA boundary and, unique policies for each discrete SPA/Two Zone Area (including level of flood proofing required; requirement for safe ingress and egress, and; other requirements as set-out in the PPS, and conservation authority programs). This section should also identify that regular updates to the SPA boundaries and policies should be considered as part of comprehensive Official Plan reviews,	The Secondary Plans contain these detailed provisions. The City is working with the TRCA and the Province on amendments to the special policy area policies for the Central Area.

#	Section	Comment	Staff Response
		in consultation with the conservation authority, and the Province.	
Credit Valley Conservation - October 23, 2009			
195.	4.5.1, 4.5.13	CVC staff support the City's continued commitment to an ecosystem approach in making decisions related to environmental planning focusing on watershed and subwatershed planning. However, the City's proposed amendment to policy 4.5.1.3 appears to have the effect of reducing the City's current standard for the completion of a subwatershed study as a prerequisite before the approval of a secondary plan. The development of the City's existing <i>'environmental planning process'</i> was in an effort to ensure that a more effective process was followed and to eliminate inefficiencies such as risk and uncertainty and expedite subsequent planning processes. At this time, it is unclear as to how the proposed amendment to this Section of the Official Plan meet the intent of the original policy and/or how the proposed amendment relates to the <i>Growth Plan Conformity Exercise</i> – including the information provided in the Recommendation Report to Council.	Revisions to Sec. 4.5.1.3 have been made in recognition of the natural heritage system planning process undertaken during the preparation of the Mount Pleasant Subwatershed Study. The Secondary Plan recognizes the need to finalize components of the subwatershed study.
196.	4.5.6	CVC staff are encouraged that the City continues to pursue strengthening the natural heritage system within Brampton. Although CVC has not yet completed our Terrestrial Ecosystem Enhancement Model (TEEM) project, as you are aware we continue to work with our partners to complete and implement an enhanced natural heritage system and supportive planning policies.	Comment acknowledged.
197.		From the proposed amendment for this section it appears as though the City is proposing to move towards reducing its standards for environmental buffers. Similar to our comments provided for the proposed amendments to Section 4.5.1 it is unclear as to how this proposed amendment meets the intent of the original policy and/or how the proposed amendment relates to the <i>Growth Plan Conformity Exercise</i> – including any of the information provided in the referenced recommendation report to Council. It was our understanding the requirement for a minimum standard 10 metre buffer was implemented to provide certainty, for consistency with other agency approaches to buffers and to continue to move forward with the City of Brampton's commitment to environmental	Policy. 4.5.13 requires a minimum 10m buffer, but recognizes that variable buffers as defined through an environmental study may be appropriate depending on the natural area's features, functions and linkages.

#	Section	Comment	Staff Response
		protection.	

4.7 Infrastructure and Utilities

#	Section	Comment	Staff Response
TRCA - October 21, 2009			
198.	4.7.2.2	Please update this policy to include the business community in water conservation initiatives we suggest: <i>"To educate the public and business community on sustainable methods of water conservation..."</i>	The policy has been revised to reflect the business community.
199.	4.7.5	To further the City's sustainability and eco-business initiatives please update this section with a new policy stating that all waste materials (solid, liquid, gas) may be considered as potential resource streams, and the municipality encourages businesses to investigate options for reuse or establishing new value-added products or services from existing waste resources.	The policy has been revised to reflect the potential for reuse of waste materials.

5.0 Implementation

#	Section	Comment	Staff Response
Gagnon Law for Royalcliff Developments Inc. - October 5, 2009			
200.		<p>Definitions:</p> <p>a) <i>Major Transit Station Area</i> – this definition suffers from some ambiguity around the terms <i>"bus depot"</i> and <i>"urban core"</i> which are not defined terms – perhaps they should be defined.</p> <p>b) <i>Mobility Hub</i> – the inclusion of the reference to <i>"attractive"</i> should perhaps be deleted as the definition really is tied to the convergence of rapid transit lines and the intense concentration of employment, living, shopping, and recreation, whether or not it is <i>"attractive"</i> is neither here nor there.</p>	<p>a) The definition of Major Transit Station Area is taken from the Growth Plan and the terms used in the definition are generally understood.</p> <p>b) This definition is consistent with the urban design guidelines across the City of Brampton.</p>
Gagnon Law for RG's Group Inc. - October 5, 2009			
201.		<p>Definitions:</p> <p>a) <i>Major Transit Station Area</i> – this definition suffers from some ambiguity around the terms <i>"bus depot"</i> and <i>"urban core"</i> which are not defined terms – perhaps they should be</p>	<p>a) The definition of Major Transit Station Area is taken from the Growth Plan and the terms used in the definition are generally understood.</p>

#	Section	Comment	Staff Response
		<p>defined.</p> <p>b) <i>Mobility Hub</i> – the inclusion of the reference to “<i>attractive</i>” should perhaps be deleted as the definition really is tied to the convergence of rapid transit lines and the intense concentration of employment, living, shopping, and recreation, whether or not it is “<i>attractive</i>” is neither here nor there.</p>	<p>b) This definition is consistent with the urban design guidelines across the City of Brampton.</p>
Gagnon Law for Medallion Properties Inc. - October 5, 2009			
202.		<p>Definitions:</p> <p>a) <i>Major Transit Station Area</i> – this definition suffers from some ambiguity around the terms “<i>bus depot</i>” and “<i>urban core</i>” which are not defined terms – perhaps they should be defined.</p> <p>b) <i>Mobility Hub</i> – the inclusion of the reference to “<i>attractive</i>” should perhaps be deleted as the definition really is tied to the convergence of rapid transit lines and the intense concentration of employment, living, shopping, and recreation, whether or not it is “<i>attractive</i>” is neither here nor there.</p>	<p>a) The definition of Major Transit Station Area is taken from the Growth Plan and the terms used in the definition are generally understood.</p> <p>b) This definition is consistent with the urban design guidelines across the City of Brampton.</p>
Gagnon Law – For 2077060 Ontario Inc. (Saberwood Homes) – October 2, 2009			
203.		<p>Definitions:</p> <p>a) <i>Major Transit Station Area</i> – this definition suffers from some ambiguity around the terms “<i>bus depot</i>” and “<i>urban core</i>” which are not defined terms – perhaps they should be defined.</p> <p>b) <i>Mobility Hub</i> – the inclusion of the reference to “<i>attractive</i>” should perhaps be deleted as the definition really is tied to the convergence of rapid transit lines and the intense concentration of employment, living, shopping, and recreation, whether or not it is “<i>attractive</i>” is neither here nor there.</p>	<p>a) The definition of Major Transit Station Area is taken from the Growth Plan and the terms used in the definition are generally understood.</p> <p>b) This definition is consistent with the urban design guidelines across the City of Brampton.</p>

Schedules

#	Section	Comment	Staff Response
KLM Planning - October 1, 2009			

#	Section	Comment	Staff Response
204.	Sched 1	Please be advised that lands shown on Schedule 1 – City Concept incorrectly designate land subject to City File No. C08E16.004 and Official Plan Amendment OP2006-016 and Zoning By-law 302-2008 as “ <i>Unique Communities</i> ”. Lands located on the east side of Goreway Drive and west of the Open Space System midblock between Countryside Drive and Mayfield Road within part of the west half of Lot 16, Concession 8 were re-designated from “ <i>Estate Residential</i> ” to “ <i>Residential</i> ” and “ <i>Open Space</i> ” by Official Plan Amendment OP2006-016 which was approved on December 10, 2008	Staff has confirmed that these lands were re-designated from “Estate Residential” to “Residential” and “Open Space” by OP 2006-016. The intent of this Official Plan amendment was to remove the “unique community” designation as shown on Schedule 1 from these lands. Accordingly, staff recommends that Schedule 1 be updated to remove the “unique community” designation from these lands.
Gagnon Law – For RG’s Group Inc - October 5, 2009			
205.	Sched 1	Should be amended to identify the Heart Lake Town Centre Area as a <i>Major Transit Station Area</i> . Consideration should also be given to identifying Sandalwood Parkway across the entire City as an intensification corridor due to the role it plays in the transportation network and as an organization element for planning purposes.	Through the finalization of the Growth Plan Conformity Exercise, the site was not deemed to satisfy the criteria for a major transit station area. Further, the review of Intensification Nodes/Corridors was undertaken through the City’s Growth Plan Conformity Exercise, no additional locations were deemed to be appropriate.
206.	Sched 1	Perhaps consideration should be given to identifying McLaughlin Road as a secondary intensification corridor in a manner similar to how segments of Heritage Road, Kennedy Road and even McLaughlin Road itself, north of Bovaird Drive have been treated.	The review of Intensification Nodes/Corridors was undertaken through the City’s Growth Plan Conformity Exercise, no additional locations were deemed to be appropriate.
207.	Sched 1	Should be revised to identify McLaughlin Road along its entire length as a primary or secondary intensification corridor.	The review of Intensification Nodes/Corridors was undertaken through the City’s Growth Plan Conformity Exercise, no additional locations were deemed to be appropriate.
Gagnon Law – For Medallion Properties Inc. - October 5, 2009			
208.	Sched 1	We suggest that consideration be given to amending the Schedule to reflect that the Medallion site is not an employment area. Perhaps also consideration should be considered to upgrade Bramalea Road from a secondary to a primary intensification corridor due to its proximity to a gateway, GO Station and other higher order transportation infrastructure	Any site specific amendments to the schedule regarding the site will be dealt with through the processing of the application. Bramalea Road is recommended to be classified as a Primary Intensification Corridor.
209.	Sched A	Should be revised to adjust the boundary of the Office designation as it applies to the subject site and replace it with a Residential designation commensurate with the use of the site.	This matter is considered as part of the processing of the site specific application.
Gagnon Law for the North West Brampton Landowners Group - October 5, 2009			
210.	Sched B, B1	Illustrates road network additions which should be reviewed in the context of the Mount Pleasant Transportation Study, the TTMP, and	The Mt. Pleasant road network was shown on the schedule to the original circulation for context purposes only. The updated Schedules B

#	Section	Comment	Staff Response
		recently approved development applications to ensure that they accurately reflect what is envisaged and recently approved.	and B1 are part of the Mt. Pleasant Secondary Plan.
211.	Sched C	Illustrates corridors which should properly reflect the comment previously made in connection with Schedules B and B1. We are also concerned about the illustration of a secondary transit corridor south of Bovaird Drive West which seems to approximate where the NTSC may align itself. Perhaps it is premature to do this until the alignment of the NSTC is further advanced.	<p>The Mt. Pleasant road network was shown on the schedule to the original circulation for context purposes only. The updated Schedules B and B1 are part of the Mt. Pleasant Secondary Plan</p> <p>The Schedule is intended to approximate future transit on the North South Transportation Corridor and the Bram-West Parkway. The detailed alignment of the transit corridor will follow the completion of the necessary municipal road Environmental Assessments.</p>
Gagnon Law for Royalcliff Developments Inc. - October 5, 2009			
212.	Sched 2	Street Corridor Master Plan should be revised to identify Sandalwood Parkway as a primary corridor consistent with other major transportation arteries in the City.	Changes to the Flower City Strategy Corridors are not being considered as part of the Growth Plan Conformity Exercise and amendment.
213.	Sched C	Should be revised to "not remove" the major transit node designation from the Heart Lake Town Centre Area, on account of the role and function of the Town Centre and the transit focus which already exists, including the location of this node on two (2) transit corridors.	This node, along with one on Hurontario, north of Sandalwood, were removed as they were deemed to satisfy primarily an operational function not having associated land use implications.
Halton Hills - October 16, 2009			
214.	Sched B, B1	It is premature at this time to show the conceptual North-South transportation corridor extending from North West Brampton into the Town of Halton Hills as well as all proposed policies and policy revisions related to the North-South Corridor and North-South Corridor Protection Area, and should be dealt with through the Halton Peel Boundary Area Transportation Study process.	The HPBATS study has progressed since the Draft OPA was circulated. The findings and recommendations of the Halton-Peel Boundary Area Transportation Study were considered by Planning Design and Development Committee on April 19 th 2010. The report supports the need for a Halton-Peel freeway option and directs area municipalities to protect the corridor for that freeway.
Region of Peel - October 29, 2009			
215.	Sched 1, 2, A	Based on the comment noted in the previous item, we suggest that the limits of the Urban Growth Centre be shown on Schedules 1, 2 and A .	Due to the difficulty in mapping multiple layers in the vicinity of the UGC area, it was determined that it would not be shown on all schedules. Schedule 1A shows the limits of the Urban Growth Centre.
216.	Sched B, B1	The jurisdiction for a new major arterial linking Major Mackenzie Drive and Mayfield Road has not been decided. The schedule should reflect this, possibly by adding a new category to the legend for "Conceptual Major Arterial" or something similar. Similarly, planning for this new road has not identified a ROW width. Schedule B1 should be revised to reflect this.	The required Environmental Assessment for arterial roads in the Hwy 427/Hwy 50 study will make a determination on the jurisdiction of the road and the Schedule can be updated at that time. The right-of-way width is subject to the Environmental Assessment but has been shown on the Schedule as an arterial road.

#	Section	Comment	Staff Response
		The HP-BATS Study area shown on the Schedules should be the same as the study area shown on maps in the TTMP.	The Schedule is intended to be conceptual and intended to show the orientation of the North-South Transportation Corridor.
217.	Sched C	Implies that Airport Road has been chosen over Bramalea Road to be a BRT Corridor. This Schedule should be revised to depict to potential BRT corridors as they are shown in the TTMP. This would require adding a new element to the map's legend but would provide clarity.	The determination of whether Airport Road or Bramalea Road shall be designated a BRT Corridor is subject to further study. A note has been added to the Schedule to provide clarity regarding the determination to be made.
MMM Group (SWM consultants for landowners in 40-5) - December 14, 2009			
218.	Sched D	Should be updated to reflect the updated CVC mapping which represents current comprehensive screening tools available to CVC to specify areas where development requires a permit application and review from the CVC.	Comment acknowledged.

General Comments

#	Section	Comment	Staff Response
CN - October 2, 2009			
219.		The existing Official Plan contains extensive policies to ensure compatibility of existing railway operations with new sensitive uses that may be proposed in proximity to rail rights-of-way, intermodal terminals and railway yards. <i>Therefore CN has no comments about the draft Official Plan amendment.</i>	Comment acknowledged
Peel Regional Police - October 2, 2009			
220.	4.10.4.3	Peel Regional Police is satisfied with the document noting that existing policy 4.10.4.3 references CPTED principles.	Comment acknowledged.
Gagnon Law – For Royalcliff Developments Inc. - October 5, 2009			
221.		We understand that there is still an ongoing Financial and Municipal Management Review and Market Demand and Feasibility Study which are required to complete the City's Conformity Exercise. We would like the opportunity to review these studies and provide comments as they may impact the proposed draft Official Plan amendment.	The Market Demand and Feasibility Study is complete and was considered by Council on February 10 th 2010.
Delta Urban – For Vales of Humber Landowners Group - December 7, 2009			
222.		Satisfied that the proposed modifications to the OP do not pose any negative impacts on the proposed Vales community. Would like to	Comment acknowledged.

#	Section	Comment	Staff Response
		stay informed.	
Gagnon Law - For the North West Brampton Landowners Group - October 5, 2009			
223.		We understand that there is still an ongoing Financial and Municipal Management Review and Market Demand and Feasibility Study which are required to complete the City's <i>Growth Plan Conformity Exercise</i> . We would like the opportunity to review these studies and provide comments as they may impact the proposed draft Official Plan amendment.	The Market Demand and Feasibility Study is complete and was considered by Council on February 10 th 2010.
224.		The draft Official Plan amendment should only be finalized after all stakeholders with an interest in this process have had an opportunity to provide input. In addition, the results and input associated with the Financial and <i>Municipal Review and Market Demand and Feasibility Study</i> should be factored into any Official Plan amendment.	Stakeholders have been provided the opportunity for engagement and comment at each stage of the Conformity Exercise; including, but not limited to, public workshops, review of background studies as well as the Draft Official Plan Amendment which was circulated for comment on September 14, 2009. Council addressed the Market Demand and Feasibility Study on February 10 th 2010. The specific recommendations that came out of the Study and Council direction will be incorporated into the Official Plan Amendment.
225.		We would ask that in future reports that the highlights of our previous submission be summarized and included as it is helpful in understanding the primary thrust of our opinions.	Comment acknowledged.
226.		We attended workshops held in conjunction with the <i>Growth Plan Conformity Exercise</i> and would request that the final recommendation report which accompanies the draft Official Plan amendment include our written submissions as they have not been included in the materials attached to the Report and the report that transpired at the workshops. While thorough, the reporting can in no way be described as definitive.	All workshop responses and submissions were summarized for the sake of consistency, reporting on all comments received and maintaining a reasonable document length. Full comments were also documented and are on file for reference.
227.		Until all background studies are completed and the public consultation process has been finalized we recommend against making a decision with respect to the population and employment forecasts.	The City carried out extensive public consultation and a series of background studies have been completed which have informed the amendment content, including the forecasts.
Gagnon Law – For Royalcliff Developments Inc. - October 5, 2009			
228.		We attended workshops held in conjunction with the <i>Growth Plan Conformity Exercise</i> and would request that the final recommendation report which accompanies the draft Official Plan	All workshop responses and submissions were appropriately summarized. Full comments were also documented and are on file for reference.

#	Section	Comment	Staff Response
		amendment include our written submission as they have not been included in the materials attached to the Report and the report that transpired at the workshops. While thorough, the reporting can in no way be described as definitive.	
229.		Until all background studies are completed and the public consultation process has been finalized we recommend against making a decision with respect to the population and employment forecasts.	The City carried out extensive public consultation and a series of background studies have been completed which have informed the amendment content including the forecast.
Gagnon Law – For RG’s Group Inc. - October 5, 2009			
230.		We understand that there is still an ongoing <i>Financial and Municipal Management Review and Market Demand and Feasibility Study</i> which are required to complete the City’s Conformity Exercise. We would like the opportunity to review these studies and provide comments as they may impact the proposed draft Official Plan amendment.	The Market Demand and Feasibility Study is complete and was considered by Council on February 10 th 2010.
231.		Consideration should be given to identifying this site as an important location for intensification. The draft Official Plan amendment and the identification of intensification opportunities should only be finalized after all stakeholders with an interest in this process have had an opportunity to provide input.	The Official Plan Amendment included locational criteria for higher density development. Refer to further discussion in the Staff Report.
232.		Policies related to height, massing and density should be assessed on a site specific and local basis as they relate to immediate surroundings.	The extent to which a site may be considered for increases in height, density and massing is evaluated based on criteria set out in policies and considering the merits of each application.
233.		We support the identification of intensification opportunities both within and outside of the Central Area and UGC where transit supportive infrastructure exists and where it is appropriate to encourage higher density residential and commercial development applying appropriate criteria.	The policies set out in the Official Plan are intended to identify opportunities for intensification within and outside of the UGC and Central Area and provides locational criteria for higher density development, provided the City Structure is maintained. Refer to further discussion in the staff report.
234.		It should be made clear in this amendment that the promotion of the UGC and the advancement of development in this area is not at the expense of growth and development in other areas of the municipality which exhibit the attributes necessary to accommodate higher density development. There are many areas in the municipality which are suitable for residential intensification and each is important in achieving the goals and objectives of the Growth Plan.	The overall structure of the City is important and determining how and where the City will grow will have a great bearing on the sustainability of the City. The Official Plan and Secondary Plan include policies which ensure that the overall City Structure is not compromised.

#	Section	Comment	Staff Response
235.		Until all background studies are completed and the public consultation process has been finalized we recommend against making a decision with respect to the population and employment forecasts.	The City carried out extensive public consultation and a series of background studies have been completed which have informed the amendment content including the forecasts.
Gagnon Law – For Medallion Properties Inc. - October 5, 2009			
236.		We understand that there is still an ongoing Financial and <i>Municipal Management Review and Market Demand and Feasibility Study</i> which are required to complete the City's Conformity Exercise. We would like the opportunity to review these studies and provide comments as they may impact the proposed draft Official Plan amendment.	The Market Demand and Feasibility Study is complete and was considered by Council on February 10 th 2010.
237.		Consideration should be given to identifying this site as an important location for intensification. The draft Official Plan amendment and the identification of intensification opportunities should only be finalized after all stakeholders with an interest in this process have had an opportunity to provide input.	This site has the benefit of being within a Gateway Mobility Hub and a primary intensification corridor both which permit high/significant levels of intensity as set out in the amendment.
238.		Policies related to height, massing and density should be assessed on a site specific and local basis as they relate to immediate surroundings.	While the key areas of intensification have policies governing height, massing and density, the details of individual applications will be assessed based on their locational attributes, site location and immediate surroundings in conjunction with the policies of the Official Plan.
239.		We support the identification of intensification opportunities both within and outside of the Central Area and UGC where transit supportive infrastructure exists and where it is appropriate to encourage higher density residential and commercial development applying appropriate criteria.	The policies set out in the Official Plan are intended to identify opportunities for intensification within and outside of the UGC and Central Area and provides locational criteria for higher density development, provided the City Structure is maintained. Refer to further discussion in the staff report.
240.		It should be made clear in this amendment that the promotion of the UGC and the advancement of development in this area is not at the expense of growth and development in other areas of the municipality which exhibit the attributes necessary to accommodate higher density development. There are many areas in the municipality which are suitable for residential intensification and each is important in achieving the goals and objectives of the Growth Plan.	The overall structure of the City is important and determining how and where the City will grow will have a great bearing on the sustainability of the City. The Official Plan and Secondary Plans include policies which ensure that the overall City Structure is not compromised.
241.		Until all background studies are completed and the public consultation process has been finalized we recommend against	The City carried out extensive public consultation and a series of background studies have been completed which have informed the

#	Section	Comment	Staff Response
		making a decision with respect to the population and employment forecasts.	amendment content including the forecast.
Gagnon Law – For 2077060 Ontario Inc. (Saberwood Homes) - October 5, 2009			
242.		We understand that there is still an ongoing <i>Financial and Municipal Management Review and Market Demand and Feasibility Study</i> which are required to complete the City's Conformity Exercise. We would like the opportunity to review these studies and provide comments as they may impact the proposed draft Official Plan amendment.	The Market Demand and Feasibility Study is complete and was considered by Council on February 10 th 2010.
243.		Consideration should be given to identifying this site as an important location for intensification. The draft Official Plan amendment and the identification of intensification opportunities should only be finalized after all stakeholders with an interest in this process have had an opportunity to provide input.	
244.		Policies related to height, massing and density should be assessed on a site specific and local basis as they relate to immediate surroundings.	The extent to which a site will receive increases in height, density and massing is evaluated based on criteria set out in policies and considering the merits of each application.
245.		We support the identification of intensification opportunities both within and outside of the Central Area and UGC where transit supportive infrastructure exists and where it is appropriate to encourage higher density residential and commercial development applying appropriate criteria.	The policies set out in the Official Plan are intended to identify opportunities for intensification within and outside of the UGC and Central Area and provides locational criteria for higher density development. Further discussion in the staff report.
246.		It should be made clear in this amendment that the promotion of the UGC and the advancement of development in this area is not at the expense of growth and development in other areas of the municipality which exhibit the attributes necessary to accommodate higher density development. There are many areas in the municipality which are suitable for residential intensification and each is important in achieving the goals and objectives of the Growth Plan.	The overall structure of the City is important and determining how and where the City will grow will have a great bearing on the sustainability of the City. The Official Plan and Secondary Plans include policies which ensure that the overall City Structure is not compromised.
247.		Until all background studies are completed and the public consultation process has been finalized we recommend against making a decision with respect to the population and employment forecasts.	The City carried out extensive public consultation and a series of background studies have been completed which have informed the amendment and the forecasts.
Bell Canada - October 16, 2009			
248.		We currently do not have any specific comments with respect to the	Comment acknowledged.

#	Section	Comment	Staff Response
		amendment. We would also like to remind staff that it is critical that Bell is kept informed of planning processes to ensure that telecommunication providers are consistent with the planned development/growth.	
Dufferin-Peel Catholic District School Board - October 16, 2009			
249.		<p>While the Board does not object to growth management practices, there may be areas in the City where the Board may have some concern with density increases that would lead to capital improvements for existing school facilities. Generally, additional residential units in established school catchment areas are welcomed by the Board as they have the potential to maintain or increase student enrolments where enrolments are declining.</p> <p>The proposed amendment seeks to optimize the use of existing and planned infrastructure and services; however, the proposed amendment does not address the impact of intensification in existing infrastructure and services, such as schools. Should the expansion of schools be required to meet increased need, it is imperative that any expansions can be accommodated in a practical way despite how surrounding lands and infrastructure are used.</p>	The City's Growth Management Program (GMP) continues to ensure the adequate supply of schools as part of the development approvals process, and as such the opportunity exists to work together with the school board to address the needs of the board.
GTAA - October 21, 2009			
250.		The GTAA has no specific comments on the proposed amendment, they would appreciate the opportunity to meet with Brampton staff to ensure that the GTAA and NAV CANADA have the opportunity to review and comment on new construction/development applications (especially high-rise) that have the potential to impact the Airport.	The GTAA forms part of the City's agency circulation list for any relevant development applications.
KLM – For Gore Road Investments Ltd. - October 19, 2009			
251.		<p>The site has an area of approx 4 acres is strategically located on Hwy 7 at the gateway to east Brampton and is well suited for the proposed use. The mixed Use node is intended to provide opportunities for retail and service commercial, hotel, offices, live/work and residential uses.</p> <p>The Mixed Use Node and the range of uses proposed is compatible with the existing and emerging uses in this area. The site will provide</p>	<p>The City has undertaken a municipal comprehensive review as part of the conformity exercise and support the addition of residential uses within a mixed use development provided the employment uses are retained that would otherwise have been provided.</p> <p>See detailed discussion in staff report.</p>

#	Section	Comment	Staff Response
		<p>support for enhanced transit use, particularly in light of its location on the proposed Brampton AcceleRide dedicated transit route on Hwy 7. The existing BE Secondary Plan designates the lands for “employment type” uses and, the redesignation of these lands to permit residential uses in conjunction with the permitted retail type uses, can only be considered as part of a “<i>Municipal Comprehensive Review</i>”, which is currently underway at the City as part of your “<i>Conformity Exercise</i>”.</p> <p>Existing zoning would permit the lands to be used for a range of industrial and commercial uses and would deliver about 160,000 sq. ft. of retail uses and 325 retail jobs. If only industrial use, the site would likely yield 140 to 200 jobs. This plan has the potential to deliver almost twice as much floor area devoted to retail and service commercial, hotel, office and live work uses, together with about 900 residential apartment type units in a true missed use format, which would maintain the intent of the City OP. As currently envisaged, the office, retail and service commercial component would yield approx 200 retail jobs, 300 office jobs, and 50 – 100 hotel jobs for a total of 550 to 600 jobs.</p> <p>The site is highly visible and provides a rare opportunity to create a diverse, dense, transit supportive Urban Node, incorporating the highest standards of Urban Design and Architecture.</p>	
252.		<p>The applicant is proposing a mixed use node that will provide opportunities for retail and service commercial, hotel, offices, live/work and residential. The current proposal consists of high-density residential buildings, free standing restaurant structures, live-work uses, a 14 storey hotel building, an 8 storey office building, and various community space features, resulting in 200 retail jobs, 300 office jobs, and 50 – 100 hotel jobs for a total of 550 to 600 jobs. The land use designation for this property is currently “deferred” but as part of the approved 2006 Official Plan, Council recommended to designate these lands as Business Corridor. The applicant would like these lands considered for the above-mentioned uses.</p>	See above and detailed discussion in staff report.
Amanda Todd - October 22, 2009			

#	Section	Comment	Staff Response
253.		<p>The closest transportation hub in the Official Plan for the Brampton East Community is Pearson International Airport and that train line only goes to Union Station. Has there been any thought given to have GO buses leaving that hub to take passengers to York Mills, Sheppard and Yonge and Finch subway stations. As I'm sure you are aware, there is a sufficient number of Brampton residents traveling to that area which would warrant that service.</p> <p>I would love to be able to take public transit everyday unfortunately the Brampton Transit in my area does not run efficiently enough to meet that need. Please ensure that this area is thoroughly reviewed and taken into account in your study as I feel that we are currently being overlooked in your plans.</p>	<p>The Greater Toronto Transportation Act required Metrolinx to work with municipalities and stakeholders to come up with a Regional Transportation Plan (RTP). This RTP aims to build a comprehensive Regional Rapid Transit network whereby the GTHA transportation system will be well-connected to surrounding regional, provincial, and international terminals and facilities. The Transportation and Transit Master Plan Update (TTMP) supports the principles set out in the RTP.</p> <p>Top transit priorities within the first 15 years of the Plan calls for a rail link between Union Station and Pearson Airport, VIVA Highway 7 and Yonge Street through York Region, VIVA rapid transit east-west spine on Hwy 7, connecting with AcceleRide on Queen Street to Downtown Brampton, Yonge Subway capacity improvements and extension to Richmond Hill, Eglinton rapid transit from Pearson Airport to Scarborough Centre, Finch/Sheppard rapid transit from Pearson Airport to Scarborough Centre and Meadowvale Road as well as high speed bus service in dedicated rights of way along Hwy 407 across Halton, Peel, York and Durham. New service is also proposed along several intensification corridors, including Finch Avenue, Sheppard Avenue and Eglinton Avenue. Transit access to Pearson will be provided from all directions – along Eglinton, Finch and Hwy 403 and Queen/Hwy 427 Corridor. Further express rail will be extended to Downtown Brampton with two-way/all-day service to surrounding urban growth centers.</p>
Region of Peel - October 29, 2009			
254.		All references to Population and Employment Growth Forecasts throughout the text must conform to those set out in ROPA 24 for the City of Brampton	ROPA 24 forecasts for Brampton have been incorporated into the final draft Growth Plan amendment together with a policy that recognizes they will be reviewed once revised Growth Plan forecasts have been released.
255.		The intensification targets should include the number of forecast dwelling units within the built up area of the City of Brampton	Given that intensification targets are measured across the Region, the targeted dwelling units within the built boundary are contained within the ROPA 24,
256.		The Greenfield density targets must conform to those set out in ROPA 24 for the City of Brampton	Brampton's Designated Greenfield Area forms part of the Region of Peel's Designated Greenfield Area, and as such the Official Plan Amendment includes policies that acknowledge that the City plans to achieve a density of 50 people and jobs per hectare.

#	Section	Comment	Staff Response
257.		The Region Intensification Corridors should be shown on Schedules 1 and 2 or referred to in the policies	Schedule 1 identifies the City's Intensification Corridor and other important elements of the City Structure. Hurontario / Main Street Corridor is identified on Schedule 1 as a Primary Intensification Corridor.
258.		The caption for the photo on page 4.8-15 contains a typo. It should say "plaque" instead of "plague".	This is revised as noted.
Fogler, Rubinoff for the owners of Shoppers World - November 4, 2009			
259.		Concerns are expressed with respect to the proposed policy changes in that they could be interpreted as detracting from the ability to properly and reasonably manage the existing site. The intensification policies should recognize the existing planned function of Shoppers World and should recognize the zoning permissions now in place which implement the planned function. Official Plan policies must not only recognize the existing use, but must also ensure that expansion and redevelopment opportunities for Shoppers World within existing zoning permissions remain fully protected.	The final Growth Plan Official Plan amendment contains a framework for articulating intensity of development in the planned key focus areas of intensification. Hurontario/Main Street is identified as a primary intensification corridor and future development along this corridor will be detailed within Secondary Plan policies.