



Public Works

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

peelregion.ca

July 17, 2020

Andrew McNeill
Strategic Leader
City of Brampton
2 Wellington Street West
Brampton ON, L6Y 4R2
Andrew.Mcneill@brampton.ca

Anand Balram
Senior Policy Planner
City of Brampton
2 Wellington Street West
Brampton ON, L6Y 4R2
Anand.Balram@brampton.ca

**RE: Heritage Heights Secondary Planning Spring 2020 Virtual Design Charettes
Region of Peel Comments**

Dear Mr. McNeill and Mr. Balram,

Thank you for the opportunity to attend the Heritage Heights virtual planning charettes hosted by the City of Brampton during May and June 2020. It is our understanding that the intention of the charettes was to develop a draft concept plan for the Heritage Heights secondary plan area to be taken to City Council for endorsement on July 27th, 2020. We understand that -through endorsement- City staff will then move forward with completing the necessary studies to support the development of a secondary plan for the area, which will then be circulated for review through the formal planning process. The concept plan in its current iteration proposes to incorporate a range of housing types and densities, hospital, employment, and institutional uses in a more intensified and urban form while seeking to replace the 400 series highway contemplated by the EA currently underway for the GTA West corridor with an “urban boulevard” cross section. While we understand that the concept plan is expected to be refined as part of an ongoing iterative consultation process, the comments enclosed in this letter outline key Regional considerations which are meant to assist City staff align with the Peel 2041 Official Plan Review and other key strategic Regional planning initiatives and requirements.

Planning and Growth Management

Growth Management and Complete Communities

As per the Brampton Official Plan policies for Northwest Brampton, the concept plan contemplates 43,000 people and 20,000 jobs. The Region’s current municipal allocation and land needs assessment work includes 300 net hectares of employment lands to be accommodated in Heritage Heights to support the achievement of its growth forecasts to 2031 and 2041. The population and employment numbers identified in this concept plan do not align with current plans for population and employment allocations in Heritage Heights. The concept plan also includes 65 hectares of employment land, which is significantly less than the planned 300 hectares for this area. Furthermore, while this concept plan shows significant office use potential, the overall office growth allocation and office market

potential for Peel and Brampton is limited. Therefore, there is a need to further demonstrate how the required employment growth will be replaced within the planning horizon.

The proposed population and employment densities are higher than what has been assumed in the Region’s Long-Range Transportation Plan (LRTP) and EA studies for the Mayfield Road, Bovaird Drive, Mississauga Road, and Winston Churchill Boulevard widenings. The Region is currently in the detailed design stage for these widening projects, therefore coordination is required to ensure that the road network has the capacity to accommodate the proposed future growth. The additional people and jobs proposed beyond what is currently identified may conflict with the intensification target being pursued by the City and Region. Due to this quantity of growth being proposed through greenfield density, the overall intensification rate would decline and fall below current Provincial policy based on the 2031 growth allocation, which must be considered and addressed through the Region’s ongoing Municipal Comprehensive Review (MCR).

The proposed concept plan uses the specific people per units as identified in the following table. When calculated across all the proposed population and residential built forms, the people per unit (PPU) is 3.56-3.61. However, the PPU’s for medium and low densities are much higher than the high density PPU, at 4.0 and 4.2 PPU respectively.

Land Use	Heritage Heights Concept PPU (Low)	Heritage Heights Concept (High)
All Types Calculation	3.56	3.61
High Density Residential/Mixed Use	2.5	2.5
Medium Density Residential	4.0	4.0
Low Density Residential	4.2	4.2

In comparing the Heritage Heights concept plan to recently developed communities in Peel, the residential densities in the Heritage Heights low concept more closely match the densities in Mount Pleasant as illustrated below:

Land Use	Mount Pleasant (units/ha in Secondary Plan)	Heritage Heights (Low Concept units/ha)	Heritage Heights (High Concept units/ha)
High Density Residential/Mixed Use	100	125	250
Medium Density Residential	60	50	100
Low Density Residential	36	20	50

Based on the information presented by City staff, we require more details as to the assumptions or other reference greenfield PPU’s that were used to develop the above noted estimates. The Region’s current draft Land Needs Assessment (LNA) has a PPU of 3.56 which reflects all designated greenfield areas across Peel. City Staff are advised to coordinate with the Region further as the Heritage Heights concept plan and Regional LNA evolve.

Public Works

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

peelregion.ca

Public Works

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

peelregion.ca

Housing

To ensure that planning for Heritage Heights is supported by a range of housing options, consideration should be made to include a mix of housing form, density, tenure and affordability in alignment with the Region’s Official Plan, Peel Housing Strategy, Peel Housing and Homelessness Plan (PHHP) and growth management strategy (including servicing capacity), along with access to transit and active transportation infrastructure, local amenities and jobs, recreation space and green space. Public and non-profit sectors are important for helping achieve low-income affordable housing units while for-profit developers help contribute to affordable housing targets - especially for moderate income households. Given the scale of the Heritage Heights development, planning for the community must aim to implement the following Regional PHHP targets through the development process:

Target Area	Targets
Affordability	10.3% of all units should be made available to low-income residents (household income up to \$61,600; maximum house price \$236,100 or maximum rent of \$850 in 2019) 13.3% of units should be available to moderate-income residents (household income between \$61,600 and \$110,500; maximum house price \$423,000 or maximum rent of \$1590 in 2019)
Tenure	25% of all new housing units should be rental
Density	50% of all new housing units should be in medium and high-density forms.

Through the formal secondary planning process, we anticipate receiving technical studies speaking to affordable housing targets by demonstrating how the above noted objectives can be met through the detailed land use planning process. Consideration must be given to phasing, how the development will contribute to low and moderate income affordable housing need (including family sized units), and how it will provide housing choice through a range and mix of unit types, sizes, and tenure.

Major Transit Station Area (MTSA)

The Region of Peel’s Major Transit Station Area study has identified the Mount Pleasant GO Station as an MTSA which is also on a priority transit corridor as per the Growth Plan. We recommend that the ultimate secondary plan for Heritage Heights maximize the existing station, other potential transit stations and related infrastructure in the area by encouraging transit-oriented developments around these resources. Along with the existing Mount Pleasant GO Station, the concept plan identifies a potential new GO Station located along the corridor. Should a new GO Station be pursued and approved, the design of the area surrounding the station should apply mobility hubs guidelines and appropriate transit-supportive densities.

The current Regional Official Plan minimum target density of the designated greenfield area across Brampton is 51 people and jobs per hectare (ROP 5.5.4.2.2). The densities proposed in the development program for the Heritage Heights secondary plan area are significantly higher in comparison to what currently exists in Peel. Other greenfield developments in Brampton and Mississauga include MTSA’s which accommodate lower

densities. For example, Mount Pleasant in Brampton supports 60 people and jobs per hectare, while Ninth Line in Mississauga is planned to support 82 people and jobs per hectare. The density assumptions around the proposed MTSAs in Heritage Heights are high and increase the overall density numbers across the secondary plan area as outlined in the following table. The proposed densities must be further reviewed and refined to prepare a concept plan which best meets a complete and transit-oriented community design in the Brampton context.

Public Works

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

peelregion.ca

Land Use	Heritage Heights (Low Concept details)	Heritage Heights (Low Concept ppj/ha)	Heritage Heights (High Concept details)	Heritage Heights (High Concept ppj/ha)	Mount Pleasant ppj/ha	Ninth Line ppj/ha
High Density Residential /Mixed Use	125 units/ha (22813 people)	161	250 units/ha (45625 people)	378	60	82
Medium Density Residential	50 units/ha (32400 people)		100 units/ha (64800 people)			
Low Density Residential	20 units/ha (39648 people)		50 units/ha (99120 people)			
Employment	33201 jobs		73341 jobs			
Light Industrial	- *		18200 jobs			
* In the Development program provided there are no light industrial employment numbers attributed to the "low concept".						

Transportation Planning

ROPA 15 and Goods Movement

On June 16, 2005 Regional Council adopted Regional Official Plan Amendment 15 (ROPA 15), which extended the Regional Urban Boundary to include all lands west of Mississauga Road, south of Mayfield Road, north of the greenbelt boundary, and east of Winston Churchill Boulevard. The Heritage Heights concept plan does not effectively demonstrate how the proposed transportation network meets ROPA 15 policies. Moreover, the Region’s Long-Range Transportation Plan (LRTP) 2019 assumes that the GTA West will be an uninterrupted freeway for its entire stretch. If the urban boulevard concept is implemented, a core assumption of the LRTP’s forecasting/modelling will be altered which will consequently have impact on the Region’s road widening plan.

The role of GTA West as an uninterrupted highway connecting with other 400-series highways is crucial for the movement of goods and an essential aspect of Peel’s Goods Movement Strategic Network. A segmented freeway that passes through an urban boulevard as proposed currently in the concept plan will be significantly less effective in

Public Works

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

peelregion.ca

moving longer-haul trucks. Regional staff conducted a preliminary analysis in 2018 to analyze various transportation corridors in west Brampton which concluded that higher-order facility would best address the transportation needs of west Brampton in terms of reduction in vehicular congestion on Regional and City roads. The GTA West Highway is a critical component of the Region's Goods Movement Strategic Network to ensure the safe and efficient movement of people and goods.

While the concept plan proposes "urban" truck-only lanes within the proposed urban boulevard, it does not sufficiently remedy the impacts on goods movement that would otherwise be facilitated by a highway that can accommodate long-haul trips. The proposed urban boulevard concept has a suggested speed limit of 60 km/hr which is significantly lower than what is planned for the GTA West highway. The reduced speed, combined with the characteristics of the road (signalized arterial boulevard), reduces the average speed and capacity of the boulevard to less than half of a highway. This will significantly lower vehicle speeds throughout in the area.

Notwithstanding the assumed potential benefits of introducing an urban boulevard as presented by City staff during the charettes, we have concerns with the potential for "bottlenecking" of traffic and goods movement upstream and downstream as a result of the urban boulevard that is expected to merge with the highway to the north and south. This will impact the GTA West highway and surrounding road network by potentially reducing the overall level of service, role and functions of each. The influence of bottlenecking will also result in more "stop-and-go" traffic, which may have significant impact on emissions.

Please be advised that Regional Council is currently in support of the GTA West Transportation Corridor consisting of a highway and an adjacent transitway. We strongly encourage City staff to consult the Ministry of Transportation, Town of Caledon, Halton Region, and York Region in future discussions surrounding the urban boulevard to ensure continuity. We also require clarity and confirmation with respect to the proposed jurisdiction and financing for the urban boulevard.

Northwest GTA Transmission Corridor Identification Study

The Ministry of Energy, Northern Development & Mines and the Independent Electricity Systems Operator are currently undertaking a study to identify lands for a future transmission corridor adjacent to the GTA West Transportation Corridor that has an approximate width of 60 metres. This current area of study coincides with the GTA West corridor study area and could potentially require additional right-of-way requirements adjacent to the highway or urban boulevard design depending on the transmission technology used (above ground vs. underground).

The concept plan does not account for the transmission corridor, which may have an impact on the proposed surrounding land use compatibility. The transmission corridor must be considered in all future secondary planning processes.

Road Character, Intersection Spacing, and Access Control

There are several minor roads identified in the proposed neighborhood street plan that propose to intersect with Regional arterial roads. This does not meet the requirements of the Region of Peel access control by-law. As such, all future concept plans for Heritage

Heights must meet the Region’s intersection spacing requirement as outlined in the access control by-law. The following table is a summary of Regional roads within the limits of Heritage Heights:

Regional Road	Designation	Full Moves Spacing
Mayfield Road	Industrial Connector	450 metres
Mississauga Road (north of Bovaird Drive)	Commercial Connector	300 metres
Mississauga Road (south of Bovaird Drive)	Suburban Connector	300 metres
Winston Churchill Boulevard (north of Bovaird Drive)	Rural Road	600 metres
Winston Churchill Boulevard (south of Bovaird Drive)	Suburban Connector	300 metres
Bovaird Drive	Suburban Connector	300 metres

Public Works

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

peelregion.ca

While the Region will be undertaking an update to the Road Characterization Study in 2021, the access control by-law and the minimum intersection spacing required are not anticipated to change. Though the smaller streets depicted on the concept plan at this stage are only conceptual, City staff are advised that connections proposed to Regional roads must be obtained through the local framework street network. The proposed commercial blocks must also obtain access from municipal roadways.

Regional Road Capital Projects

There are several active Regional capital projects for road widenings within Heritage Heights. The EAs for these widenings do not take into consideration the street network that is presented in the current concept plan as well as the newly forecasted population and employment numbers. As such, the current scope of these projects does not accommodate any newly proposed intersections or additional growth.

Sustainable Transportation

The Region’s Sustainable Transportation Strategy recommends a multi-use path (MUP) with some paved shoulders on Mississauga Road, Mayfield Road, Winston Churchill Boulevard, and Bovaird Drive. These in-boulevard facilities are recommended because of factors such as speed and volume, which currently would not be conducive to on-road facilities (such as bike lanes and buffered bike lanes). Regional staff are supportive of some form of cycling infrastructure along the Regional road network; however, the type of facility must be further determined through established guidance documents such as OTM Book 18 and TAC.

Public Health

Through Regional Official Plan Amendment 27 (ROPA 27), the Region is implementing the Healthy Development Framework (HDF) which is a collection of Regional and local, context-specific tools that assess the health promoting potential of development applications. All tools in the HDF incorporate evidence-based health standards to assess the interconnected core elements of healthy design: density, service proximity, land use mix, street

connectivity, streetscape characteristics and efficient parking. A key policy of ROPA 27 is to inform decision-makers of the health promoting potential of planning applications. In reviewing the concept plan through the HDF, we support the inclusion of a range of housing options which allows residents to remain within their community regardless of age while supporting social and physical connectedness. Regional staff are also supportive of the creation of smaller block development and the avoidance of non-connected streets.

Public Works

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

peelregion.ca

Water and Wastewater Servicing and Environmental Considerations

Regional Water and Wastewater Master Plan

The Region of Peel has initiated a Water and Wastewater Master Plan for its lake-based systems with an objective to identify a preferred lake-based water and wastewater strategy to support existing servicing needs and projected growth. The Water and Wastewater Master Plan is coordinated with ongoing Regional Official Plan Amendments (ROPA) which guide Provincially mandated growth within the Region to 2041.

The arrangement of growth and development in Heritage Heights must be coordinated with the Region to best utilize the existing Regional infrastructure adjacent to and within Heritage Heights. Technical studies in support of the subsequent secondary planning process must consider both the Heritage Heights secondary plan area and its surrounding areas to best determine how to service the subject lands. The results of the technical studies can inform the developable area in coordination with available Regional infrastructure to determine timing and phasing of development.

Environment (Identification and Protection of a Greenland System)

The Regional Official Plan identifies a Regional Greenland System made up of core areas, natural areas and corridors, and potential natural areas and corridors. The core areas are protected through official plan policies (2.3.2.6) that prohibits development and site alteration. A healthy natural system must be identified and protected through the completion of the Heritage Heights Subwatershed Study. The outputs from the study should inform the identification, designation and protection of a natural heritage system. The identification and designation of a natural heritage system should ensure that core areas of the Regional Greenlands System will be protected, including the use of appropriate buffering. When developing the land use concept plan, best efforts must be made to first avoid locating infrastructure and development within these features.

The completion of the subwatershed study and designation of a natural heritage system must also address the relevant policies of the Provincial Policy Statement, 2020 and Growth Plan, 2019, including the Growth Plan sections 4.2.1 Water Resource System, 4.2.2 Natural Heritage System (Policy 4.2.2.6) and 3.2.7 Stormwater Management. The Growth Plan directs municipalities to develop a stormwater management plan, informed by watershed planning.

Shale Resources

The Region's shale resources protection policies which apply to Heritage Heights have been updated through Regional Official Plan Amendment 32 (ROPA 32) which is presently under

appeal at the Local Planning Appeal Tribunal and therefore not in effect. Please be advised that ROPA 32 policies may be approved or modified through the resolution of this appeal.

The preparation of the Heritage Heights secondary plan should anticipate that updated shale protection policies will be resolved through the appeal process. Should ROPA 32 be approved with or without modifications, the policy direction and mapping of shale resource protection areas must be reflected in the Heritage Heights policy framework. The secondary plan should also anticipate the need to include appropriate policies addressing separation, buffering and mitigation adjacent to lands identified as High Potential Mineral Aggregate Resource Area (HPMARA) or adjacent to sites that are subject to an application for a license, or are licensed, for extraction under the Aggregate Resources Act.

Public Works

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

peelregion.ca

Climate Change

The Region is currently undertaking a review and update to the Regional Official Plan, including proposed new and updated policies to mitigate and adapt to climate change by aligning with recent Provincial policy changes to the Provincial Policy Statement, 2020 and the Growth Plan, 2019 to support the achievement of low-carbon, complete and sustainable communities. This includes Regional policy direction and integrated climate change mitigation and adaptation policies in key theme areas including compact mixed-use design, sustainable modes of transportation and public transit infrastructure, protection and enhancement of natural heritage and water resource systems, stormwater management, waste management, and opportunities for energy conservation/efficiency and alternative and renewable energy systems, including district energy. Through the planning process, City staff should endeavor to implement land use policies intended to reduce greenhouse gas emissions and community vulnerability and protect and enhance natural and green infrastructure. As a member of the City of Brampton's Community Energy and Emissions Reduction Plan (CEERP) Task Force, the Region supports the Task Force in their recognition that the Heritage Heights community represents the best opportunity to achieve a net-zero emissions community through implementation of the CEERP.

Next Steps

Regional staff look forward to working collaboratively with the City of Bampton and other stakeholders throughout the next stages of the secondary planning process to ensure that the plan for Heritage Heights takes into consideration our input with respect to matters of growth management, housing, transportation, public health and environmental protection. Overall, from a Regional network connectivity perspective, the urban boulevard puts into question the core concept of GTA West as a high-capacity freeway connecting with the 400-series network which will impact lands beyond the limits of Heritage Heights. We strongly encourage the city to consult with the Ministry of Transportation, Town of Caledon, Halton Region, and York Region in future discussions surrounding the urban boulevard. Furthermore, to ensure that key infrastructure program planning is accounted for early in the secondary planning process, we request that draft policy and mapping be circulated to the Region for review prior to the formal circulation of the secondary plan application. Including and beyond this formal submission, City staff are also advised that based on the outcome of the discussion with MTO there may be a need to further discuss the Halton-Peel Boundary Area Transportation Study.

Thank you for allowing us the opportunity to engage in this iterative process which requires strong collaboration between the Region, City and all other stakeholders. We look forward to engaging further in this process to refine the plan further once it is taken to City

Council for endorsement. Please continue to work with Development Services staff as the one window service for Regional input into this process.

For further inquires, please contact the undersigned at 905-791-7800 extension 4416 or at althaf.farouque@peelregion.ca.

Sincerely,



Althaf Farouque MES, MCIP, RPP
Interim Manager
Development Services, Public Works

CC: John Hardcastle, Interim Director, Region of Peel
Adrian Smith, Acting Director and Chief Planner, Region of Peel
Terry Ricketts, Director, Region of Peel

Public Works

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

peelregion.ca



Legend

- low density (20 to 50 units/ha)
- medium density (50 to 100 units/ha)
- high density (125 to 250 units/ha) & mixed use
- wellness district
- main street retail (ground floor)
- town square
- convenience commercial & mixed use
- employment & light industrial (clean, odorless & quiet)
- open space connections
- environmentally sensitive land
- pipeline corridor
- CN rail corridor
- major transit station area
- community park
- neighborhood park
- water reservoir
- elementary school
- secondary school
- Catholic school
- Fire Department
- separated bike facility
- framework street (A-street in black & B-street in gray)
- Greenbelt trails (actual alignments & connections to be determined separately)

