



July 15, 1983

Mr. R.A. Everett
Clerk
City of Brampton
150 Central Park Drive
Brampton, Ontario
L6T 2T9

Subject: Proposed Official Plan for the
City of Brampton Planning Area
File No. 21-OP-0031

Dear Mr. Everett:

This is further to our letters of March 16, 1982 and August 3, 1982, concerning the proposed official plan. We have recently received comments from the Ministry of Agriculture and Food on the plan and we would also like to provide council with an updated report on the correspondence we have received since our last report to council.

We have included a summary of the ministry's comments and suggested modifications in Part A of this letter and indicated in Part B other issues/referral requests, etc. We have included, as an appendix to this letter, a copy of all objections/referral requests received in this period.

We would ask that council give consideration to the suggested modifications and the referral requests and that we be formally advised of council's most recent position.

By copy of this letter to the Region of Peel, we are asking for regional council's formal position as well.

A. Ministry of Agriculture and Food:

The ministry has completed its review of the plan and additional material and background documentation provided by the city and the region and offers the following comments:

1. Section 1.1.2.2. (D) and (E), pages 27-28

The ministry has indicated that these policies

permit 2 severances per 100 acre original farm half-lot and also allow severances for other than farm-related purposes. These policies conflict with Section 4A.20 of the Food Land Guidelines and, therefore, they have asked that they be deleted and replaced with policies which apply to farm-related severances. This ministry had previously made this request regarding the severance policies in proposed Amendment No. 55 to the old plan.

The ministry recommends, therefore, that subsections "(D)" and "(E)" be deleted and replaced with the following:

"(D) Severances to create a residential lot in the Agricultural designation shall only be permitted if the lot is intended as a retirement lot for a farmer who has been farming a substantial number of years and is retiring from active working life, or

(E) A residential lot is required to provide accommodation for full time farm help whose working activity is primarily devoted to the farm operation and where the nature of the farm operation requires this help to be accommodated close to the farm."

2. Section 2.5.3.2.4, pages 125-126

The ministry has requested the inclusion of an additional criterion for council in reviewing applications for new cemeteries or the enlargement of existing cemeteries, namely, that the following be added at the end of Section 2.5.3.2.4:

"(VIII) impact on agricultural land".

3. Section 2.8 (general), pages 129-135

The ministry has requested, that since virtually all the lands within the "Rural" designation are high capability agricultural lands as defined by the Food Land Guidelines, that the designation should be changed to "Agricultural". This would accurately reflect the predominant land use and intended future use of this area. We believe this would require minor revisions to the word "Rural" in the following sections:

11.2(2)(i)

→ (a) 2.8.1,

(b) 2.8.3.2,

(c) 2.8.3.4,

(d) 2.8.3.8,

(e) 2.8.3.10,

(f) the title "Site Specific Rural Designations", on page 132, and the first paragraph,

(g) 2.8.6.2(i).

We believe also that a minor revision would also be required to "Note (i)" on page 28.

4. Sections 2.8.2 and 2.8.3, page 129

The ministry feels that these objectives are not sufficiently protective of agriculture to be consistent with the Food Land Guidelines and has recommended the following replacements:

"2.8.2 OBJECTIVE: The availability of lands for agriculture and related uses on a long term basis.

2.8.3 OBJECTIVE: Within areas having long term resource capabilities for agriculture, only agricultural uses, uses compatible with agriculture, and uses directly related to agriculture and necessary in proximity to agriculture".

5. Section 2.8.3.1, pages 129-130

The ministry has requested the deletion of the words "unless the applicant can demonstrate that this action will cause him unfair and unreasonable hardship" from the end of this section. The ministry feels that this does not take into account the hardship or unfairness that approval of the application can cause to the livestock operation. We suggest that the phrase be deleted accordingly.

6. Section 2.10.1, page 137

The ministry recognizes that the Snelgrove-Mayfield area will be the subject of further study and a possible future official plan amendment. As much of the land within the study area is good agricultural land, as defined by the Food Land Guidelines, the ministry feels that any future proposal for non-agricultural use in this area will need to justify development as outlined in Sections 3.13 and 3.14 of the Guidelines. We recommend the addition of the following new paragraph at the end of Section 2.10.1.2, namely:

"In the Snelgrove-Mayfield Study, the city will satisfy Sections 3.13 and 3.14 of the Food Land Guidelines, for that portion of the study which is located within the City of Brampton."

7. Schedule "A"

(a) Huttonville Specialty Crop Area

The ministry has informed us that a specialty

crop area exists in the vicinity of Huttonville that warrants special recognition in the plan. This is an area within which the coarse textured soils have led to the production of tree fruits, and nursery and greenhouse crops. The ministry has asked that the area be identified on the land use schedule and in the text to indicate that only agricultural uses will be permitted on these lands. We have indicated the area on the attached copy of Schedule "A" and recommend that an appropriate policy be added to the text.

The ministry has also requested an addition to the policies which would prohibit the expansion of Huttonville, particularly to the south and west.

(b) Industrial Designations in the Northwest Quadrant of the Urban Area (Lots 9-13, Concession 2, W.H.S.)

The ministry objects to the "Industrial" designation of the majority of the lands in this area. The ministry feels that the background documentation did not justify the need to designate these lands for industrial purposes. The ministry feels that the documentation provided indicates that the city has adequate land designated for industrial purposes for a 344,000 population level without the inclusion of this area.

With the exception of a small site in Lot 8, Concession 8, W.H.S. (which is currently designated as "Industrial"), the lands are presently designated and used for agriculture and the soils have a high capability for agriculture. As you know, we have already received referral requests from APPEAL for all of the "Industrial" designated lands in this area, and the Brampton Northwest Rural Ratepayers on the "Industrial" designation of lands located in Lots 11-13.

Based on the above, we recommend that the lands in Lots 9, 10, 11, 12 and 13, Concession 2, W.H.S. be redesignated from "Industrial" to "Agricultural".

(c) Rural Estate Expansion Areas

The ministry objects to the designation of the three "Rural Estate Expansion Areas". The soils are high capability agricultural lands as defined by the Food Land Guidelines. The Guidelines clearly indicate that estate residential development shall only be permitted if it can be accommodated on low capability agricultural land, in areas well removed from agricultural activity, and in a separate designation from agriculture. Because of this conflict with the Guidelines, the ministry objects to the designation of three sites

and the related policy section in the text. As you know, we have already received a referral request from APPEAL on the designation of these areas as "Rural Estate Expansion".

We recommend, therefore, that the three "Rural Estate Expansion Areas" and the "Urban Boundary" designation around them be deleted from Schedule "A" and Section 2.1.3.2.11, page 64, be deleted from the text.

(d) Residential Designations of Lots 11-15, Concessions 3-6, W.H.S., all inclusive

The ministry notes that although the designation of this area represents a significant change from the 1978 draft of the plan, the ministry recognizes that this land will eventually be required to accommodate urban growth. However, they feel strongly that there is a need for a phasing scheme for this area so that the agricultural community is aware of the sequence of development and can plan accordingly for continued agricultural production in the area until development occurs. They would want to see as much of this land as possible farmed so long as it is not needed for housing.

The ministry has asked that a phasing or staging plan for residential growth of this area be incorporated into the plan, consistent with Section 4C.6 of the Food Land Guidelines. Staff of the city and the ministry have met with my staff to discuss this request by the ministry and concluded that policies should be included in the plan which would encourage the orderly retreat of the agricultural use, speak to the issue of leasing good agricultural land back to farmers and provide criteria (in addition to those included in section 7.4) for development phasing so as to preserve agricultural land as long as possible. We suggest that objectives and policies be included in the "General Provisions", "Specific Secondary Plans" and "Budgeting and Development Phasing" sections of the plan, however, city staff may wish to include specific policies elsewhere in the plan.

B. Other Issues, Referrals

1. Since sending out our letter, we have received new mapping from the Metropolitan Toronto and Region Conservation Authority which indicates that more land is subject to possible flooding under the

regional storm conditions than that shown on Schedule "B". This additional land is located along Etobicoke Creek. The new mapping was not finalized at the time your plan was adopted and at that time it was circulated to the authority. At that time, the authority indicated that new mapping was being prepared and might show additional lands as being subject to flooding.

Staff of this ministry met with your staff and the staff of the authority and the Ministry of Natural Resources to discuss the new mapping. It was concluded that the most appropriate method of including the new mapping into your official plan would be by recommending that the following parts of the plan be deferred at that time:

- (a) Schedule "B", Hazard Lands, the areas shaded in "red" on the attached copy of that portion of the schedule, and
- (b) Section 1.2 "Hazard Lands" of the text, but only insofar as it applies to the areas shaded in "red" on Schedule "B".

This deferral would enable staff to prepare appropriate mapping and policies for an orderly development in accordance with the purpose and intent of your official plan, but at the same time, also in accordance with the provincial policy on planning for flood plain lands as announced in September of 1982. Such additional mapping policies can then be incorporated into your official plan by an amendment.

2. Lands Located at the South-West Corner of Steeles Ave. and Kennedy Rd.

We note that the plan designates as "Open Space" some 20 ha (50 acres) of land at the southwest corner of Steeles Avenue and Kennedy Road. It appears that this designation was placed on the lands because they are owned by the province and were acquired as a part of the original 100 acre parcel. The Parkway Belt West Plan, as approved by Cabinet in July 1978, calls for public acquisition of the southwesterly half of the property only. The other half lying outside of the Parkway Belt West Plan, was and is still not required for Parkway Belt purposes and will be disposed of together with numerous remnant parcels throughout the Parkway Belt which have already been sold or will be sold in the near future.

We are prepared to recommend to our senior management that the designation of the subject parcel be deferred at the time of approval of your plan. This, in turn, would enable the staff of the city and provincial staff to discuss the most appropriate land use designation for the subject property. We trust that this course of action is satisfactory to council.

3. Letter from Mrs. V. Flowers, on behalf of APPEAL, dated 82 07 14:

This letter was received after our report to council and further clarifies the precise objections of APPEAL. Council may wish to provide us with further comments on this objection.

4. Letter from Mr. E. van Donkersgoed, on behalf of the Coalition to Preserve Foodland dated 82 07 30:

This letter is in support of APPEAL's request.

5. Letter from Town of Caledon, dated 82 06 28:

The town objects to Section 2.1.2.43 together with any other section of the plan regarding the servicing of Tullamore.

6. Letter from Mr. R. Webb, dated 83 03 02:

Mr. Webb objects to the designation of the west half of Lot 12, Concession 10, E.H.S. We understand that Mr. Webb is concerned that all of the subject lands be designated for "Rural Estate Expansion". However, as you will note (in item A.7(c), we are recommending that the "Rural Estate Expansion Area" be deleted in its entirety.

7. Letter from Mr. R. Maksymiw, on behalf of eight parties, dated 82 07 15:

Mr. Maksymiw requests referral of the "Rural" designation of the sites indicated and feels the areas should be designated for development.

8. Letter from Mr. R. Webb, on behalf of B. & D. Skoko, dated 83 04 27:

Mr. Webb objects to Section 1.1.2(2) (b) (ii) (D), page 27 because in his opinion, the policy is too restrictive to his clients. Council will note however, that we have suggested a revised policy (in item A.1) which may not be satisfactory to Mr. Webb.

9. Letter from Mr. D. Strachan, on behalf of First City Development Corporation Ltd. (Heart Lake Joint Venture, dated 83 05 17:

Mr. Strachan has clarified his referral request and asks that the designation of "Woodlot Z" be referred to the board along with appropriate policies. We understand that negotiations may resolve this issue prior to the approval of the plan. If however, this does not occur prior to the approval, we recommend that this issue be deferred at the time.

10. Letter from Mr. E. Sorbara, on behalf of Sam-Sor Enterprises, dated 83 05 09:

Mr. Sorbara has asked that the "Industrial" designation of Part of Lot 4, Concession 9, N.D.S., not be deferred as was suggested by council.

11. Letter from Mr. A. Starkman, dated 82 09 03:

Mr. Starkman has indicated that not all of his lands in Lots 2 and 3, Concession 2, W.H.S. appear to be included in the urban boundary as indicated on the land use schedule. We wonder if because of the related policies of the plan for this section council is of the opinion that all of Mr. Starkman's property is included in the urban boundary? If not, does council wish to offer some alternative concerning the property.

12. Letters from Mr. J. Taylor, R.E. Winter & Assoc. Ltd., on behalf of Paramount Development Corp. Ltd., dated 82 11 08 and 82 11 24:

These letters were in support of the "Residential" designation of "New Development Area 12". We provide these for council's information.

We have council's response to our earlier letter and subsequent requests by councils and staff regarding a number of modifications. Once we receive councils' position on the above-noted issues and we are able to finalize our negotiations with some of the referral requestors, it is our intent to make our recommendations to senior management on the disposition of the Brampton Official Plan.

Yours truly,


Z. Weing
Senior Planner
Plans Administration Branch