

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
1. Al Ruggero, Rexton Developments, re. 11 Wadsworth Street	<p>The property is zoned M2 and the draft Official Plan is proposing a General Industrial land use designation. Requesting a re-designation through the OP Review process for a higher order land use such as commercial uses.</p> <ul style="list-style-type: none"> • The site is in close proximity to an arterial road (i.e. West St); • The site abuts the Via Rail Station; • The site is in close proximity to the Downtown Urban Growth Centre (i.e. Schedule 5); and • The site is surrounded on 3 sides by a Residential designation (according to Schedule 3) <p>Feels that a higher order land use such as a ‘Commercial designation’ would be more compatible from a planning perspective.</p>	<p>The draft Official Plan maintains the General Employment land use designation but has also applied a Modified Policy Area to the subject property to enable future rezoning to consider a broader range of commercial uses in the existing building than what is otherwise permitted in an Employment Area designation. It was not considered to be a candidate for Employment Area conversion through redesignation because of its adjacency to the railway and shunting yard.</p>
2. Meaghan Palynchuk, Bell Planning & Development	<p>Draft Official Plan, Section 8.2: Thank you for supporting the provisioning of fibre technology within your Municipality.</p> <p>Draft Comprehensive Block Plan Terms of Reference: Upon approval of any Block Plan, and any subsequent site-specific planning applications made by the landowners, Bell Canada would like to ensure that the landowners are familiar with our condition.</p> <p>Draft Infrastructure Staging Report: Bell Canada would like to be circulated on any proposed infrastructure projects/programs.</p> <p>Urban Design Manual: Recommend adding the words “where feasible” to provide additional flexibility in the guidelines regarding the design and/or screening of utility equipment and telecommunications infrastructure.</p>	<p>The list of conditions provided in the comments is for the draft plan of subdivision approval process that follows the Block Plan process. The City will continue to circulate development applications to Bell Canada for comment through the development approvals process, and forward Bell Canada comments and conditions to the applicants.</p> <p>The Urban Design Manual uses flexible language like “should” rather than “shall”. It is the opinion of Staff that additional flexibility is not necessary and may serve to diminish the importance of these guidelines. Developments that require variation from these guidelines should be addressed on a site-specific basis and justified through Urban Design Reports, where required.</p>
3. Brantford Home Builders’ Association	<p>Draft Official Plan</p> <ul style="list-style-type: none"> • Given the Province has approved the amendment to the Growth Plan for the Greater Golden Horseshoe to provide for a 2051 horizon and new population and employment forecasts, we look forward to reviewing how the City will modify the proposed Draft Official Plan. We would encourage the City to consider additional Designated Greenfield lands which is in keeping with the previous Council resolution. • In Policy 5.2.1 Residential Designation for Low-Rise Residential Buildings, Block Townhouse Units should be added to the permitted land use as they are similar in height, massing and density to street fronting townhouse units. • In Policy 5.2.1 Residential Designation for Mid-Rise Residential Buildings, “Back to-Back” dwelling units should be added as a permitted use. Many of our members are utilizing this form as a way to support affordable housing. <p>Draft Comprehensive Block Plan Terms of Reference</p> <ul style="list-style-type: none"> • This is a new approach for the City and many of our members are not familiar with how this is implemented. In principle, there may be merit in coordinating efforts and technical work based on a geographic area. We would encourage the City to organize an industry meeting to present the approach and foster collective discussion to ensure there is understanding and to provide direction to the Official Plan policies. <p>Draft Infrastructure Staging Report and Urban Design Manual</p> <ul style="list-style-type: none"> • Request additional industry meeting to discuss the Infrastructure Staging Report and related master plans and the Urban Design Manual. • Additional consultation time is requested on the Urban Design Manual and given that the Manual is an implementation tool of the Official Plan, it is recommended that no decision be made on the Urban Design Manual until after the adoption of the Official Plan. 	<ul style="list-style-type: none"> • The Draft Official Plan has been revised to account for the new population and employment forecasts to 2051. The MCR Addendum Report contains the updated land needs assessment that has resulted in an additional 95 net developable hectares added to the Settlement Area. • The Draft Official Plan has been revised to include all townhouse forms in Low-Rise and Mid-Rise Residential built forms. • A meeting was held with industry representatives on September 28, 2020 to discuss the draft Terms of Reference which resulted in revisions to the document and related Official Plan policy. Planning staff will arrange additional meetings to present the new Official Plan and related implementing documents including the Comprehensive Block Plan Terms of Reference, Infrastructure Staging Report and Urban Design Manual to the BHBA. • Staff is of the opinion that appropriate time for consultation has been provided. Public Information Centre #6 held on October 7, 2019 included discussion on the urban design principles proposed for the Urban Design Manual. In addition, a Draft Urban Design Manual was released alongside the Draft Official Plan on June 30, 2020 for a two month public and agency commenting period. Further, the revised Urban Design Manual was released for public review on October 22, 2020 for an additional commenting opportunity ahead of Council’s consideration of the document. It is recommended that the Urban Design Manual and the Official Plan be adopted concurrently.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
4. Carol Wiebe, MHBC, re. Lynden Park Mall	<p>Schedule 1 – Growth Management</p> <ul style="list-style-type: none">We are supportive of the Urban Structure shown on Schedule 1, and identifying Lynden Park Mall as a Strategic Growth Area. <p>Major Commercial Centre Designation</p> <ul style="list-style-type: none">Our client continues to support the proposed designation of Lynden Park Mall as a Major Commercial Centre within a Strategic Growth Area. We seek clarification to confirm that Retail Warehouse, Supermarket, Department Store and Retirement Home uses are permitted.We are supportive of the direction that development may consist of individual or multi-unit buildings. However, we do not agree that the proposed minimum building height of 3 storeys or 10 metres, whichever is greater, should apply to all new buildings. Further, there is an approved site plan associated with the Lynden Park Mall lands that contains single storey commercial buildings. These buildings would not be compliant with this policy. <p>Core Natural Areas Designation and Adjacent Lands Overlay</p> <ul style="list-style-type: none">We do not support the identification and designation of the Core Natural Areas designation on portions of the site. It is our opinion that the limits of the Core Natural Areas designation should be revised to reflect the approved development limits that were established and approved through site specific planning approvals for the subject lands. The requirement for Environmental Impact Study (EIS) in the Core Natural Areas designation has already been fulfilled for the subject land through those approvals.We do not support the Adjacent Lands Overlay on the site as this does not reflect the findings of the approved EIS.	<p>The list of uses permitted in the Major Commercial Designation, provided in Policy 5.3.1.b has been revised to clarify that Retail Warehouse, Supermarket, Department Store and Retirement Home uses are permitted.</p> <p>To provide greater flexibility to commercial developments, while still supporting intensified residential development in Strategic Growth Areas, Policy 5.3.2.d in the Major Commercial Designation and Policy 5.3.3.g in the Intensification Corridor Designation have been revised to apply a minimum 3 storey building height only to stand-alone residential buildings and mixed-use buildings containing residential units.</p> <p>Planning Staff have confirmed that the Core Natural Area Designation as delineated on the Official Plan schedules does not overlap with the development limits set out in the approved Lynden Park Mall site plan. Policy revisions have been made in Section 5.6.1 to recognize existing planning approvals. In cases where an EIS was completed and approved in support of the existing approval, further EIS requirements may be waived by the City.</p> <p>The Adjacent Lands Overlay is not a land use designation; rather, it is a flag to determine if an EIS is necessary to support development proposals within 90 metres of the Core Natural Areas Designation. Similar policy revisions have been made in section 5.6.2 to recognize existing planning approvals and waive the EIS requirement.</p>
5. Candice Hood, Corbett Land Strategies Inc., re. LIV Communities (313 Conklin Road, 88 Birkett Lane and Riverwalk)	<p>The Draft Official Plan only provides density direction for Growth Areas and the Designated Greenfield Area. Will density standards be provided for lands designated residential but located outside of Growth Areas and the Designated Greenfield Area? Or, is it anticipated that the completion of an update to the Zoning By-law will result in the provision of density direction for these and other designations?</p> <p>Schedule 13 – Road Widenings (ROW)</p> <ul style="list-style-type: none">What is the rationale for increasing the ROW on Birkett Lane from River Rd to Erie Ave from 20 m to 24.5 m? The owner is currently engaged in the development of the subject lands with the acknowledgment of only a 20 m ROW.Confirm where Conklin Road requires widening to 30.5 m between Gillespie Drive and Mt. Pleasant Road.	<p>DGA density targets are applied as per the requirements of the Growth Plan for the Greater Golden Horseshoe. Density is otherwise dictated by built form and height in the Draft Official Plan. Height limits will be further refined in the Zoning By-law.</p> <p>Official Plan Schedule 13 identifies Right-of-way (ROW) limits for various road segments in the City, so they can be conveyed to the City through the development process, typically in equal measure from both sides of the road. Schedule 13 includes existing roads where the current right-of-way is less than the standard width for the proposed road classification set in the Transportation Master Plan, such as Birkett Lane. There are multiple road classifications such arterial, collector and local roads, each of which accommodates different demand function, speed and design. Right-of way widenings are not necessarily just for expanded roadway or travel lanes. They can also include turning lanes, sidewalks or multi-use paths, bike lanes, transit facilities, boulevards for trees, public art or street furniture. For example, a major collector road such as Conklin Road between Gillespie Drive and Mount Pleasant Road is proposed to have a right-of-way that can accommodate the extension of the boulevard and bike lanes that are in place to the north of the rail trail.</p>

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
6. David Falletta, Bousfields Inc., re. Virgoan Properties Ltd. and Biely Knowes Holdings Inc.	<p>Draft Official Plan, Section 5.2.1 Residential Designation</p> <ul style="list-style-type: none">5.2.1.c, Include all forms of townhouses (street, back-to-back, and stacked townhouse dwellings) in Low-Rise Residential Buildings.5.2.1.x, The DGA structure should be flexible and allow for modifications through the block plan and or development application process without the need for an Official Plan Amendment.Concerned with the proposed realignment of Balmoral Drive and request flexibility regarding the implementation of the road network including other proposed collector roads on the subject properties.5.2.1.x.ii, The exception prohibiting Low-Rise Residential Buildings in the Neighbourhood Corridor sub-category should be limited to single detached and semi-detached buildings. <p>Section 5.4 Policies for Employment Areas</p> <ul style="list-style-type: none">Would like to see permitted uses within the Prestige Employment Designation include Transportation facilities, Utilities, Industrial trade schools, Media facilities, Vertical agriculture. <p>5.6 Policies for the Natural Heritage System</p> <ul style="list-style-type: none">Recommend reducing the 30m buffer within the Core Natural Areas designation to 10 m.Recommend applying a Modified Policy Area (Natural Heritage System Special Study Areas) to two areas within the subject lands to allow modifications and/or removal of Core Natural Areas based on additional analysis. <p>3.3 Ensuring Good Urban Design and 5.1 General Provisions for All Land Use Designations</p> <ul style="list-style-type: none">Believe that policies 3.3.b and 5.1.e.i give additional weight to a guideline, which has no statutory authority, can be updated by the City without any notice or input, and may create issues with development applications that do not comply with prescriptive guideline requirements. Recommend removing requirement for consistency with the Urban Design Manual, and recommend Block Plans shall not be required where the Block Plan components, as identified in policies 5.1.f to 5.1.h, inclusive, can be achieved through a Draft Plan of Subdivision application. <p>Urban Design Manual</p> <ul style="list-style-type: none">The guidelines related to blocks (Section 3) should be revised to provide additional flexibility, especially in areas adjacent to a natural heritage feature or other open space.The guideline (4.3.2) related to the location of off-street surface parking should be revised to provide additional flexibility should a situation arise where limited front yard parking is appropriate.The guideline (5.1.5) related to townhouses facing major streets should be revised to include window streets in addition to rear lanes as an appropriate type of access for this form of development.	<ul style="list-style-type: none">Policy 5.2.1.c in the Draft Official Plan has been revised to consider all townhouses to be Low-Rise Residential BuildingsNew policy has been added in Section 5.1 to allow adjustments to the boundaries of the Natural Heritage System, Residential Designation sub-categories, the bikeways and trail network and road network, as identified on the Schedules to the Plan, through the Block Plan process without the requirement for an Official Plan Amendment.The exception in Policy 5.2.1.x.ii has been revised from all Low-Rise Residential Buildings to single-detached, semi-detached and duplex dwellings.Specific employment area uses will be identified in the Zoning By-law.The 30 m buffer is consistent with the recommendations of the Comprehensive EIS for the North Brantford and Tutela Heights Expansion Lands prepared for the Offiical Plan Review, regarding the components of the Natural Heritage System.A Modified Policy Area is not necessary given new policy has been added in Section 5.1 to allow adjustments to the boundaries of the Natural Heritage Systemthrough the Block Plan process without the requirement for an Official Plan Amendment.The Official Plan requires consistency, which means that development should comply with the guidelines unless there are compelling circumstances not to do so. Such circumstances would be evaluated during the development application review process.The subject lands require a block plan to co-ordinate with other properties within the Balmoral Block Plan area and other adjacent lands. The Block Plan Terms of Reference (TOR) has been revised to provide greater clarification and flexibility in regard to study requirements between the block plan process and the draft plan of subdivision process that would follow approved block plans. While the TOR sets out minimum requirements, applicants may submit more detailed studies to assist staff in the review of block plans and potentially expedite subsequent draft plan applications.The guidelines referenced already use flexible language like “should” rather than “shall”. It is the opinion of Staff that additional flexibility is not necessary and may serve to diminish the importance of these guidelines. Developments that require variation from these guidelines should be addressed on a site-specific basis and justified through Urban Design Reports, where required.This guideline has been revised to replace the word “shall” with “should” to ensure there is flexibility; however, rear lanes are the preferred design approach as they are generally more effective at reducing vehicle speeds, allowing for on-street parking on the fronting street, and benefiting active transportation when compared to alternative options like window streets.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
	<ul style="list-style-type: none">• The guideline (5.1.9) related to the height of front doors for low-rise residential buildings should be revised to provide additional flexibility.• The guideline (5.2.1) related to the height of mid-rise buildings should be revised so that buildings are designed to a height of 100% of the street width, rather than 80%.• The guidelines (5.2.6) related to the 45 degree angular plane of mid-rise buildings should be revised so that the angular plane is measured at the rear property line of adjacent low-rise residential buildings (rather than any type of low-rise building) and that some minor penetrations of the angular plane be allowed.• The high-rise buildings guidelines (5.3) are too prescriptive. They should be generalized and additional guidance on the general intent and purpose of the guidelines should be provided.	<ul style="list-style-type: none">• The guideline referenced already uses flexible language like “should” rather than “shall”. It is the opinion of Staff that additional flexibility is not necessary and may serve to diminish the importance of this guideline.• This guideline has been revised to remove the reference to 80% of the street width. It is the opinion of Staff that the existing maximum height and stepback requirements are sufficient to achieve the design objective of ensuring the streetwall maintains a human-scale and minimizes shadowing.• The referenced guideline has been revised as recommended.• The guidelines referenced already use flexible language like “should” rather than “shall”. It is the opinion of Staff that additional flexibility is not necessary and may serve to diminish the importance of these guidelines. Developments that require variation from these guidelines should be addressed on a site-specific basis and justified through Urban Design Reports, where required. The general intent and purpose of these guidelines is provided in the introductory paragraphs of Section 5.3 High-Rise Buildings.
7. Douglas Stewart, IBI Group, re. 712102 Ontario Inc., 101 Catharine Avenue	<ul style="list-style-type: none">• We believe that the preferred form of development for 101 Catharine Avenue is Block townhouse units to be implemented though the new Official Plan. We believe that there is merit in the City defining “Infill Development”, permitting Block Townhouse within the Low-Rise Residential and adding “Back-to-Back” to the Mid-Rise Residential.	<ul style="list-style-type: none">• Infill development opportunities contribute to intensification, and are recognized in Policy 4.3.c.iii as a form of intensification that may occur within the Built-up Area, including vacant and underutilized lands.• The Draft Official Plan has been revised to include all townhouse forms in Low-Rise and Mid-Rise Residential built forms.
8. Douglas Stewart, IBI Group, re. 1475764 Ontario Inc., 133-147 Mohawk Street	<ul style="list-style-type: none">• A preliminary development concept is being prepared for the proposed redevelopment of the property. We believe there is merit to designate the property as Neighbourhood and Residential.	<ul style="list-style-type: none">• This property has been identified for Employment Area conversion in the Municipal Comprehensive Review – Addendum Report and has been redesignated to “Neighbourhoods” on Schedule 1 and the “Residential Designation” on Schedule 3.
9. Douglas Stewart, IBI Group, re. Annspel Holdings Ltd.	<ul style="list-style-type: none">• Schedules 11 and 12 contemplate a proposed Minor Collector to connect Powerline Road and Balmoral Drive. However, Schedule 4 only designates the north/side leg of the proposed Collector Road as Neighbourhood Corridor. We would recommend the City designate the entire proposed Collector as Neighbourhood Corridor.• Regarding Policy 5.1.d.iv, it is not efficient and cost effective to have street frontage on all sides of a park. Please consider revising.	<ul style="list-style-type: none">• New policy has been added in Section 5.1 to allow adjustments to the boundaries of the Residential Designation sub-categories (including Neighbourhood Corridor), as identified on the Schedules to the Plan, through the Block Plan process without the requirement for an Official Plan Amendment.• This policy discourages reverse frontage (back-lotting) abutting public streets and adjacent to parks and encourages alternatives. It does not prohibit all lots from backing onto parks and open space.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
10. Douglas Stewart, IBI Group, re. Caraszma Developments and Brantford Landscaping And Sodding Inc	<ul style="list-style-type: none"> Comments note that the Settlement Area is likely to be expanded as a result of the increased population and employment growth forecasts and extended planning horizon to 2051 in the Growth Plan amendment, and request the subject properties be considered. Proposed Schedule 3 Land Use Plan where lands are within the Agricultural Designation does not provide any distinction between lands that were initially thought to be required to meet planning targets and lands for the future referred to as the “Trigger Lands”. At the time of the [municipal] boundary expansion the inclusion of the Trigger Lands was an important concept as it affected when lands could be eventually included in the urban boundary. Is the principle of the Trigger Lands no longer relevant? 	<ul style="list-style-type: none"> The subject lands were evaluated through the Municipal Comprehensive Review (MCR) as Block C6 and not included in the proposed settlement area expansion required to meet the growth projections in the June 2020 Draft Official Plan. The Draft Official Plan has been revised to account for the new population and employment forecasts to 2051. The MCR Addendum Report contains the updated land needs assessment that has resulted in an additional 34 net developable hectares added to the Settlement Area for residential purposes. However, the additional land need has been allocated to the northeast corner of the City on the north side of Powerline Road to round out the area referred to as Block C8 in the MCR analysis. That area was preferred over lands further north of Jones Creek (Block C6) in the extensive land evaluation undertaken in the MCR to determine by how much and where the Settlement Area should be expanded. At the time of the municipal boundary expansion in 2016, it was anticipated that all of the annexed lands would be added to the Settlement Area and new Official Plan policies and holding zones would be applied to phase development such that the Trigger Lands would be the last areas to be developed. Due to the changes to the Growth Plan since 2017, the Settlement Area cannot be expanded at this time to include all of the annexed land, and those lands remaining outside of the Settlement Area are to be in the Agricultural Designation in the Official Plan. However, the principle of the Trigger Lands remains relevant for considering where future Settlement Area expansion is to occur, applying a lower priority to the Trigger Lands than other lands that are not in the Settlement Area.
11. Ronald Bisailon, Brantford Landscaping & Sodding Ltd.	<ul style="list-style-type: none"> Request that lands at 332-324 Governors Road be considered for Settlement Area expansion as more housing supply will be needed, given the updated Growth Plan and Land Needs Assessment Methodology released by the Province. 	
12. Steve Szasz, Caraszma Developments Inc.	<ul style="list-style-type: none"> Request that lands at 308 Governors Road be considered for Settlement Area expansion as more housing supply will be needed, given the updated Growth Plan and Land Needs Assessment Methodology released by the Province. 	
13. Douglas Stewart, IBI Group, re. Samarlin Homes, 155½ and 159 Terrace Hill Street	<ul style="list-style-type: none"> Comments suggest that this property is best suited for Block townhouse dwellings, and requests that built form be permitted within the Low-Rise Residential area. 	<ul style="list-style-type: none"> Infill development opportunities contribute to intensification, and are recognized in Policy 4.3.c.iii as a form of intensification that may occur within the Built-up Area, including vacant and underutilized lands. The Draft Official Plan has been revised to include all townhouse forms in Low-Rise and Mid-Rise Residential built forms.
14. Ed Bernacki	<ul style="list-style-type: none"> Suggested additional growth management policy to highlight that “The population of Brantford will include a diversity of age groups which will need to be accommodated”, along with age profile statistics. Expressed concerned there is not enough recognition of seniors and the Healthy Aging Plan in the Draft Official Plan. Encourages a greater mix of housing types and more housing designed for seniors within neighbourhoods. 	<ul style="list-style-type: none"> The Official Plan is one of various City documents that affect development and design within Brantford. It is implemented through the Zoning By-law as well as the Urban Design Manual, which has been revised to provide better reference to the City’s Healthy Aging : Age Friendly Plan. (See Item 29 in this matrix.) The new Official Plan will promote a greater mix of housing types within Brantford than the past, as well as more opportunities for mixed-use developments. A mix of land uses and activities can facilitate easier access to commercial and recreational uses and health services for people with less mobility.
15. Ashley Graham, Grand River Conservation Authority	Draft Official Plan Section 3.5 Promoting Sustainable Development and Adapting to Climate Change <ul style="list-style-type: none"> Consider including broader policy statements regarding protecting the quality and quantity of surface water and groundwater. Include the current percent of tree canopy cover in the City. 	<ul style="list-style-type: none"> Source water protection policies have been expanded in the revised Draft Official Plan. The current percentage of tree canopy is unknown.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
	<p>Section 5.6.1 Core Natural Areas Designation</p> <ul style="list-style-type: none">Subsection a.iv - ‘Significant Wildlife Habitat’ by definition includes habitat for species of special concern but does not include habitat for provincially listed species at risk. It is recommended that ‘habitat for threatened and endangered’ (categories of species at risk) be listed separately.Section 6.1 Floodplain Areas should be updated to include the watercourses present in the expansion lands such as Jones and Phelps Creeks.In Section 6.2, Steep Slope and Erosion Hazards, suggested edit in subsection b: Development proposals within and adjacent to the steep slopes shall require a site-specific geotechnical assessment to establish a more precise slope hazard and appropriate setback limit to the satisfaction of the City and the Conservation Authority.Section 6.8 Modified Policy Area, Area 2 – recommend additional wording regarding river access; Area 5 - GRCA requests removal of the reference to GRCA acquiring these lands.Section 8.1 Municipal Servicing Infrastructure Systems, add wetland to subsections n. iii and iv.Section 9.11 Development Applications, formal pre-consultation with the City to include relevant commenting agencies.Schedule 7-3, would be more accurately labeled Steep Slope Erosion Hazard. <p>Draft Urban Design Manual</p> <p>Section 2.3.5 Colborne St. East and West Corridors</p> <ul style="list-style-type: none">It is recommended the Colborne St. East Intensification Corridor Boundary Map take into consideration the slope hazard on Colborne Street East, east of Calvin Street. <p>Section 3.6 On-Street Parking and Section 3.9 Natural Heritage Features, Parks, Open Spaces, Multi-Use Trails and the Waterfront</p> <ul style="list-style-type: none">Two guidelines encourage low impact development measures focused on infiltration of stormwater that may assist in achieving water balance targets, however, the potential impacts of chloride from road salting on groundwater and natural heritage features should be considered when determining whether or not to infiltrate runoff from roads and parking areas.	<ul style="list-style-type: none">Additional policy has been added regarding Endangered and Threatened Species Assessments.Revision made.Policy has been revised.Revisions made.Revisions made.The boundary of the Intensification Corridor Designation is established through the Official Plan and it is included in the Urban Design Manual for illustrative purposes. Potential constraints to development are not noted on the map; however the Manual is clear that all development must address applicable provincial and municipal policies and standards, which would include those related to slope constraints.These guidelines have been revised to ensure that consideration is had for the potential impacts of chloride on groundwater and natural heritage features.
16. Tate Kelly, Infrastructure Ontario, Hydro One Networks Inc.	<p>W. Ross Macdonald School</p> <ul style="list-style-type: none">Request that the Core Natural Areas Designation and Adjacent Lands Overlay as they apply to the W. Ross Macdonald School be removed. <p>Hydro Corridor Lands Comments</p> <p>Terminology</p> <ul style="list-style-type: none">Request that all reference to corridors used for the transmission and distribution of electricity should be referred to as “hydro corridors” and all references to electricity infrastructure and facilities should be referred to as “electricity generation facilities and transmission and distribution systems.” <p>Land Use Permissions</p> <ul style="list-style-type: none">Request clarity in Policies 5.1 and 8.1 that development subject to an Environmental Assessment process under the Environmental Assessment Act shall be deemed to meet the policy, and shall be permitted in the Core Natural Areas designation or the Adjacent Lands Overlay. <p>Underground Utilities</p> <ul style="list-style-type: none">Request that Policy be revised to exempt infrastructure projects that are approved through an Environmental Assessment process under the Environmental Assessment Act. The Environmental Assessment process considers the locational factors identified in the proposed policy, among others.	<ul style="list-style-type: none">The Core Natural Areas Designation recognizes the existing woodlot on site. The Adjacent Lands Overlay is not a land use designation; rather, it is a flag to determine if an Environmental Impact Study (EIS) is necessary to support development proposals within 90 metres of the Core Natural Areas Designation. The EIS can be scoped or waived depending on the specifics of a development proposal, such as barriers within the Overlay itself, such as Brant Avenue between the W. Ross Macdonald School and the Core Natural Areas Designation along the rail corridor.Revisions have been made to various policies referring to hydro corridors and related facilities.Revisions have been made to Policy 5.1.k and 8.1.d and 8.2.b in the updated Draft Official Plan regarding electricity generation facilities and transmission and distribution systems and Environmental Assessments.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
	<p>Protection of Corridors</p> <ul style="list-style-type: none">Request additional policy intended to protect hydro corridors. <p>Parks and Open Space Designation and Secondary Uses</p> <ul style="list-style-type: none">Request that Policy 5.2.3(j)(ii) be revised to read: “The City will encourage the use of utility corridors, rights-of-way and easements to establish open space linkages, <i>where supported by the accommodating utility operator or landowner.</i>”Requested additional policy regarding secondary uses in hydro corridors.	<ul style="list-style-type: none">Policy added in Section 8.2.Revision made in Section 5.2.3.j.ii.Policy added in Section 8.2.
<p>17.</p> <p>John Ariens, IBI Group, re. Bella Gardens Industrial Subdivision</p>	<p>Official Plan Schedules</p> <ul style="list-style-type: none">Request that the General Employment designation apply to all but the Garden Avenue frontage.Concerned that the Adjacent Lands Overlay places environmental restrictions on the adjacent lands. Suggest that flexibility be added so that the need for an EIS is discretionary and depending on the site circumstances. <p>Land Use Policies</p> <ul style="list-style-type: none">How is the density of 25 jobs per hectare to be calculated? Is it over the entire designation or on a smaller area basis?What is meant by “limited sale” of products?What is a distribution center—could this be a retail warehouse? What does “major” mean in the list of prohibited uses?What about recreational facilities (Gyms, bowling, movie theatres etc.), these are not identifiedThe prohibition on outdoor display would prevent any display pads out front. Product Display pads should be exempted.Buildings along the 403 and arterial roads have to face these roads and in essence will have 2 fronts. Limited parking is allowed in the fronts and therefore all loading and most of the parking has to be in the sides. This creates a difficult site plan process and some flexibility needs to be added such as “shall generally” be designed. <p>Transportation Policies</p> <ul style="list-style-type: none">New roads are to incorporate pedestrian and active transportation such as bike lanes, multi-use pathways and sidewalks on both sides. This will require wider roads or revised engineering standards and increases the cost of new development. These standards are also not appropriate in a general industrial setting.	<ul style="list-style-type: none">Schedules 3 and 4 have been revised to redesignate the northern portion of the Employment Area from Prestige Employment to General Employment, leaving the more visible Garden Avenue and Highway 403 frontages for Prestige Employment.The Adjacent Lands Overlay is not a land use designation; rather, it is a flag to determine if an EIS is necessary to support development proposals within 90 metres of the Core Natural Areas Designation. The EIS can be scoped or waived depending on the specifics of a development proposal.Net developable area excluding Core Natural Areas, cemeteries, and right-of-ways for Hwy 403, railroads, electricity transmission lines and energy transmission pipelines.This will be refined in the Zoning By-law but the intent is to ensure that manufacturing of the product is the primary use rather than sales of the product.A retail warehouse would be a prohibited major retail use. Major retail and major office are defined in the Growth Plan.The Zoning By-law may permit gyms as ancillary recreational facilities.Product display pads if not visible from Highway 403 or any Arterial or Collector road would not be prohibited.The policy states “generally”.Sidewalks, transit facilities and links to the broader active transportation network of bikeways and trails outlined on Schedule 11 are necessary to provide more options for employees to get to work and safely move about within the Employment Area when accessing ancillary services and amenities.
<p>18.</p> <p>John Ariens, IBI Group, re. Horwath Farms</p>	<p>Official Plan Schedules</p> <ul style="list-style-type: none">Requests that the Strategic Growth Area and Intensification Corridor Designation be applied along the east side of the Wayne Gretzky Parkway extension, as it is shown on the west side.Requests that the Core Natural Area Designation be removed from 12 acres of agricultural field at the north end of 317 Powerline Road. <p>Urban Structure</p> <ul style="list-style-type: none">The OP should identify how the DGA density of 60 persons per hectare is to be calculated. Please consider adding a definition of net developable.In the Neighbourhoods, what is meant by “limited commercial and institutional”?	<ul style="list-style-type: none">Revisions have been made to Schedules 1, 3 and 4 to accommodate this request.Revisions have been made to Schedules 1, 2, 3, 4 and 6 to accommodate this request.The DGA density is to be measured in accordance with the Growth Plan for the Greater Golden Horseshoe, in which case net developable excludes Core Natural Areas, cemeteries, and right-of-ways for Hwy 403, railroads, electricity transmission lines and energy transmission pipelines.Commercial and institutions uses permitted with the Neighbourhoods are intended to be smaller in scale and more locally oriented than commercial and

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
	<p>Land Use Designations</p> <ul style="list-style-type: none">The Plan should allow conventional 2 storey townhouses in the low density category and higher forms such as Back to Back and Stacked in the Medium Density category.Any development in the Adjacent Lands Overlay triggers the need for an EIS. This is too restrictive. <p>Transportation Policies</p> <ul style="list-style-type: none">Any development where a single access is 250m or longer will require a second access. Should state “generally” so that an OPA is not needed for a 254m road length. <p>Block Plans</p> <ul style="list-style-type: none">Concerns expressed with the Block Plan process, timing of individual subdivision applications and issues related to landowner cooperation and contribution. Suggested the use of secondary plans instead. Request that the Block Plans be deferred for now.	<p>institutional uses permitted in Strategic Growth Area in the Downtown, Major Commercial Centres and Intensification Corridors and Major Institutional designations.</p> <ul style="list-style-type: none">The Draft Official Plan has been revised to include all townhouse forms in Low-Rise and Mid-Rise Residential built forms.The Adjacent Lands Overlay is not a land use designation; rather, it is a flag to determine if an EIS is necessary to support development proposals within 90 metres of the Core Natural Areas Designation. The EIS can be scoped or waived depending on the specifics of a development proposal.Policy has been revised to state “generally”.The Block Plan process has been advanced to inform and ensure coordination between the various development applications that will follow, rather than a secondary plan process. The draft Terms of Reference has been revised to provide greater clarification and flexibility in regard to study requirements between the block plan and draft plan of subdivision processes.
19. Jay Hitchon, re. Karek properties, 170 and 194 Powerline Road	<ul style="list-style-type: none">We submit that the lands at the north east corner of the City of Brantford should be included in the settlement area boundary and designated for residential development. The Settlement Boundary should be relocated to the easterly boundary for the lands fronting on Powerline Road as well.If there are any recommendations for other properties to be included in the Settlement Area at the east end of Powerline Road, the Karek properties should be included.	<ul style="list-style-type: none">The subject lands were evaluated through the Municipal Comprehensive Review (MCR) and not included in the proposed settlement area expansion required to meet the growth projections in the June 2020 Draft Official Plan. The Draft Official Plan has been revised to account for the new population and employment forecasts to 2051. The MCR Addendum Report contains the updated land needs assessment that has resulted in an additional 34 net developable hectares added to the Settlement Area for residential purposes. However, the additional land need has been allocated to the northeast corner of the City but on the north side of Powerline Road. That area was preferred over the south side of Powerline Road in the extensive land evaluation undertaken in the MCR to determine by how much and where the Settlement Area should be expanded.The northward extension of Garden Avenue along the unopened Karek Road was considered in the evaluation of land use and transportation options in the MCR Part 3 Report. The proposed extension was not identified as a required infrastructure project in that analysis or the recent Transportation Master Plan.
20. Barb Smith, re. Karek properties, 170 and 194 Powerline Road	<ul style="list-style-type: none">Requests that 170 and 194 Powerline Road be included in the Settlement Area.Expressed concern that future development will lead to congestion on Powerline Road, Wayne Gretzky Parkway and Lynden Road. Opening up Karek Road to Garden Avenue could provide additional route to Hwy 403 to relieve congestion another gateway to the north end of Brantford.	
21. Elizabeth Howson, Macaulay Shiomi Howson Ltd., re. Welton and Innes G.P. Inc.	<p>Sections 5.1 f-h: Role of the Block Plan Process</p> <ul style="list-style-type: none">Notes that Welton and Innes G.P. Inc. own 99% of the lands in the Lynden Garden Block Plan area so there is no need for any significant coordination with other owners, and the issues will be addressed through the plan of subdivision. Request that flexibility be provided in the policies with respect to the Block Plan process to allow further consideration of whether such a process, or a hybrid alternative, should be applicable to Lynden Garden. <p>Sections 5.2.1 c. Policies for Low-Rise Residential Buildings and 5.2.1 g. Policies for Mid-Rise Residential Buildings</p> <ul style="list-style-type: none">Requests that permitted uses in the Low Rise and Mid Rise Residential designations be generalized to allow consideration of back-to-back townhouses and other similar alternative townhouse forms.	<ul style="list-style-type: none">The Block Plan Terms of Reference (TOR) has been revised to provide greater clarification and flexibility in regard to study requirements between the block plan process and the draft plan of subdivision process that would follow approved block plans. While the TOR sets out minimum requirements, applicants may submit more detailed studies to assist staff in the review of block plans and potentially expedite subsequent draft plan applications.The Draft Official Plan has been revised to include all townhouse forms in Low-Rise and Mid-Rise Residential built forms.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
	<p>Section 5.6.1 l. and m. Core Natural Areas Designation and Section 5.62 f. and g. Adjacent Lands Overlay</p> <ul style="list-style-type: none">The boundary of the system identified on the proposed schedule does not accurately reflect the underlying Natural Heritage System. Requests that their scoped Environmental Impact Study be considered before any final determination is made of the boundary of the Core Natural Areas and Adjacent Lands Overlay designations in Lynden Garden. In addition, the policies should be clarified to identify a stormwater management facility as a permitted use in the Core Natural Areas designation outside any significant natural heritage features. <p>Schedule 4 Designated Greenfield Area Structure</p> <ul style="list-style-type: none">Requests that the Neighbourhood Centre and Neighbourhood Corridor designations identified on Schedule 4 be modified in accordance with the concept attached to this submission.	<ul style="list-style-type: none">New policy has been added in Section 5.1 to allow adjustments to the boundaries of the Natural Heritage System, Residential Designation sub-categories, the bikeways and trail network and road network, as identified on the Schedules to the Plan, through the Block Plan process without the requirement for an Official Plan Amendment.As noted above, modification can occur through the block plan process.
<p>22. David Aston and Stephanie Mirtitsch, MHBC, re. Losani ‘Area C’ Lands, 501 Shellard Lane and 544 Shellard Lane</p>	<p>Area C Lands</p> <ul style="list-style-type: none">These lands are within the current Settlement Area and Designated Greenfield Area. In the current West of Conklin Secondary Plan, Area C/Modified Policy Area 7 – Shellard Lane, the principle of development is acknowledged and the limits and density of development will be defined by various criteria and supporting background studies, including an Environmental Impact Assessment, as part of the development application process.It is our understanding that Modified Policy Area 20 in the Draft Official Plan, carries forward the development intent of the current in force Official Plan. We understand on this basis that residential development will be permitted within the Area C Lands, and that the significant natural heritage features, cultural heritage landscapes and associated buffers will be determined through environmental study as part of a formal development application. Please confirm. <p>Natural Heritage Concerns - 501 and 544 Shellard Lane</p> <ul style="list-style-type: none">Delineation and appropriate buffers should be determined through environmental study as part of the development application process. To our knowledge, no study has been completed by the City to identify these features and appropriate buffers.With regard to 544 Shellard Lane, we would request confirmation that the natural heritage features and associated buffers be determined through environmental study, as part of a future development application.If the intent of the Adjacent Lands Overlay is to trigger an Environmental Impact Study, that should be identified through the pre-consultation process.Applications that have draft plan approval should not be subject to Schedule 6.With regard to 501 Shellard Lane, natural features and buffers have already been confirmed through completed and approved studies, as part of the draft plan approval process, and should be reflective of the approved draft plan.We request clarification that the natural features and buffers for these lands will be confirmed through appropriate studies, and applications, and would request confirmation that an Official Plan Amendment will not be required to permit development in these areas, if confirmed otherwise through completed and approved studies.	<ul style="list-style-type: none">The Area C modified policy in the current plan has been carried forward to the new Official Plan in Modified Policy Area 20, maintaining the principle of development within the area, subject to environmental and other technical studies to support future development and access to it in this highly constrained area.Official Plan policy allows refinements to the Natural Heritage System where supported by EIS. The NHS including buffers are based on recommendations in the Brantford Official Plan Review Natural Heritage Strategy (2014) and Comprehensive EIS for the North Brantford and Tutela Heights Expansion Lands (2020), both prepared by Plan B Natural Heritage consultants.This is the intent of the Overlay – to flag that whether or not an EIS is required needs to be determined at a pre-consultation meeting.Modifications have been made to the Schedules to align the Core Natural Areas Designation with limits established in approved draft plan of subdivisions to the south of Shellard Lane. In addition, policy revisions have been made in Section 5.6.1 to recognize existing planning approvals. In cases where an EIS was completed and approved in support of the existing approval, further EIS requirements relating to the Core Natural Areas Designation and/or Adjacent Lands Overlay on Schedule 6 may be waived by the City.
<p>23. Arnold Valian, Mildred Valian, Helen Engeneski, re. ‘Area C’ Lands</p>	<ul style="list-style-type: none">Part owners of land in “Area C”.Reviewed the newly released Draft Official Plan and in principal disagree and object to the new policy that applies to their lands.	<p>The Area C modified policy in the current plan has been carried forward to the new Official Plan in Modified Policy Area 20, maintaining the principle of development within the area, subject to environmental and other technical studies to support future development and access to it in this highly constrained area.</p>

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
24. Matt Ninomiya, WalterFedy Group, Douglas Stewart, IBI Group, re. 2577909 Ontario Inc. And GLK Brantford Holdings Inc. (466 King George Road And 391 Powerline Road); re. 1869721 Ontario Limited (207 and 209 Mount Pleasant Street); and re. 419 Powerline Road	<ul style="list-style-type: none">With respect to Policy 4.1.a.vi, please advise the form and function of the limited commercial development that would be supported. Our client would want to have the opportunity to develop commercial uses which may be located at the intersection of Powerline Road and the future Minor Collector Road. Within Section 5.2.1.b, no commercial land uses are identified, and under 5.2.1.b.ix, “Neighbourhood supporting use” is listed which is not defined. Please clarify. <p>Regarding the Block Plan Terms of Reference:</p> <ul style="list-style-type: none">It is recommended that the City be the proponent of the Block Plans with input from landowners through a public process.It is recommended that the Terms of Reference clarify what the City expectations are for satisfactory feedback, regarding consultation with other landowners.It is recommended that the City limit the scope of the Block Plan studies in efforts to expedite the Block Plan process recognizing that detailed studies will follow with each development application and can confirm or refine assumptions made at the Block Plan stage.It is recommended that the City not require a Block Plan for <u>all</u> lands within the Block Plan area if it can be demonstrated that the said lands can advance independently.	<ul style="list-style-type: none">Commercial and institutions uses permitted with the Neighbourhoods are intended to be smaller in scale and more locally oriented than commercial and institutional uses permitted in Strategic Growth Area in the Downtown, Major Commercial Centres and Intensification Corridors and Major Institutional designations. A list of Neighbourhood supporting uses is provided in Policy 5.2.1.t.The expectations regarding consultation have been revised in the Block Plan Terms of Reference (TOR).The Block Plan TOR has been revised to provide greater clarification and flexibility in regard to study requirements between the block plan process and the draft plan of subdivision process that would follow approved block plans. While the TOR sets out minimum requirements, applicants may submit more detailed studies to assist staff in the review of block plans and potentially expedite subsequent draft plan applications. Submissions requirements could also be scoped through the Block Plan pre-consultation process.Additional policy has been added to the Draft Official Plan to provide some flexibility regarding the Block Plan requirement. The block plan boundaries as illustrated on Schedule 2 will remain but the new policy will allow some development applications to be waived from the block plan requirement by the General Manager of Community Development, such as site plans and minor variances that do not involve lot creation or adjustment, and subject to the application not conflicting with the objectives set out in policy 5.1.f). Whether the subject property can be waived from the Block Plan requirement will depend on the whether the development proposal does not conflict with policy 5.1.f criteria, including its relation to future servicing of the Block Plan area.
25. Martin Quarcoopome, Weston Consulting, re. TRG Brantford (George St, Market St, Marlborough St, and Grey St)	<ul style="list-style-type: none">Planning applications were submitted in March 2020 to facilitate the development of a 16- storey mixed use high-rise rental project.As part of our active development application, Transportation Engineering Staff advised that the existing right-of-way of 20m has been increased to 24.5m. A widening of 2.2m would be required to address engineering standards. This widening, along with 4.5m daylight triangles at the Market/ Grey and Market/ Marlborough intersections are shown on our site plan and will be dedicated to the City.Market Street is now proposed to have a 30.5m proposed ROW width in Schedule 13, which will have significant impact on the proposed development. Request that no additional lands be provided as our development application precedes this new requirement.	Schedule 13 in the Draft Official Plan includes existing roads where the current right-of-way is less than the standard width for the proposed road classification set in the updated 2020 Transportation Master Plan; in this case, 30.5 m for a Major Collector Road such as Market Street, as identified on Schedule 12. As per the ROW policies in Section 7.2 of the Draft Official Plan, the standard widths represent the extent of widenings which may be taken, but final road allowance widths will be determined through the completion of detailed design during the development approvals process.

Individual or Company	Summary of Comments on the June 2020 Draft	Staff Response
26. Lucy Marco, President, Grand River Council on Aging	<p>In Section 2.1 of the Official Plan, add “age friendly” to the opening paragraph between “unique” and “urban”.</p> <p>Urban Design Manual</p> <ul style="list-style-type: none">• Add references to the City’s Healthy Aging : Age Friendly Plan• Add Building Accessibility and Accessible/Barrier Free Parking in Section 3• Consider adding requirements for: adequate parking in proximity to destinations for those with mobility issues, concrete sidewalks with no slant, maintenance of public plantings, specific transport routes for large trucks to reduce noise and promote safety, accessible public washrooms, rest areas, benches and fountains.	<p>Instead of adding another idea into the opening sentence, the following change was made in the fifth sentence:</p> <ul style="list-style-type: none">• “Residents have access to a range of community services and recreational amenities to support their well-being.” now reads “Residents of all ages have access to a range of housing, community services and recreational amenities to support their well-being.”• Similarly, the words “of all ages” were inserted in policy 5.3.1.iii., regarding the intent for Downtown to be a great neighbourhood for everyone. <p>In the Urban Design Manual,</p> <ul style="list-style-type: none">• The City’s Age-Friendly Strategy is now listed as an additional design document in Appendix B to the Manual. The listed text is included as hyperlink to the Strategy on the City website, so someone reading the Manual online can open the Strategy online with one click.• The Urban Design Report Terms of Reference (Appendix A to the Manual) has been revised to include ‘accessibility considerations’ as one of the design considerations that must be addressed in Urban Design Reports.• The Urban Design Manual provides a set of guidelines that will contribute to the development of an age-friendly community, including specific sections dedicated to Accessible Design and Active Transportation. The document also includes a list of other provincial and municipal design documents that must be consulted which also support age-friendly design, such as the Design of Public Spaces (DOPS) Standards and now the City’s Age-Friendly Strategy too.
27. Trevor Hawkins, MHBC, re. 251-253 Mount Pleasant Road	<ul style="list-style-type: none">• The owner supports the general policy direction provided within the Residential designation, and the Neighbourhood Corridor designation for the subject lands, as well as the density target of 55 residents and jobs combined per hectare.• While the owner does not object to the broader planning goals and objectives intended by the use of Block Planning, the owner does not support the inclusion of the subject lands within the Tutela Heights West Block Plan Area, and respectfully requests that the City amend the boundary to exclude the subject lands.• The requirement for Block planning is more aligned with coordinating future draft plans of subdivision for larger communities, with new roads, municipal services, parks and stormwater management facilities. The redevelopment of the subject lands, which is a relatively small parcel, is more consistent with a typical redevelopment/intensification of an existing, developed property.• Inclusion within the Block Plan Area will cause significant delays as the owner will need to wait for other, much larger landowners to prepare the necessary background work, engage with the City, and prepare reports and conceptual draft plans of subdivision to inform the Block Planning for the surrounding lands.	<p>Additional policy has been added to the Draft Official Plan to provide some flexibility regarding the Block Plan requirement. The block plan boundaries as illustrated on Schedule 2 will remain but the new policy will allow some development applications to be waived from the block plan requirement by the General Manager of Community Development, such as site plans and minor variances that do not involve lot creation or adjustment, and subject to the application not conflicting with the objectives set out in policy 5.1.f). Whether the subject property can be waived from the Block Plan requirement will depend on the whether the development proposal does not conflict with policy 5.1.f criteria, including its relation to future servicing of the Block Plan area.</p>