



APPENDIX #3



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

October 20, 2023

GWD File: PN.22.3303.00

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

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

**Subject: Public Input – Letter of Concern
Final Draft – Proposed ‘Brampton Plan’
75 – 77 Eastern Avenue
Candeco Realty Limited**

Gagnon Walker Domes Ltd. (“GWD”) acts as Planning Consultant to Candeco Realty Limited (“Candeco”); the Registered Owner of the properties municipally known as 75 & 77 Eastern Avenue in the City of Brampton (hereinafter referred to as the “subject site”). The subject site is located on the south side of Eastern Avenue, between Kennedy Road South and Hansen Road South, and is located within the Kennedy ‘Primary’ Major Transit Station Area (“MTSA”).

Candeco is currently preparing redevelopment plans for the subject site, and a Pre-Application Consultation with City of Brampton Planning Staff is expected to be filed shortly. Candeco is desirous of redeveloping the subject site for a transit-oriented mixed use high-density residential development in keeping with Brampton Vision 2040, as well as the Mixed-Use designation on Schedule 2 of the proposed Draft New City of Brampton Official Plan (December 2022). Candeco Realty is preparing redevelopment plans also as a result of the City of Brampton proposal to widen Eastern Avenue to four lanes plus bike lanes and connect it through to Clark Boulevard and Hwy 410. The proposal and concept plan layout will be refined as we work through the Development Application process.

Candeco has been actively engaged in the City of Brampton’s MTSA Planning Study process. This has included, but is not limited to, formal written correspondence prepared by GWD on behalf of Candeco to the City’s Planning and Development Committee dated July 20, 2023, and August 28, 2023, along with separate written submissions made by Aird & Berlis LLP.

Candeco is an Appellant of City of Brampton Official Plan Amendment OP2006-247.

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

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OVERVIEW of DRAFT BRAMPTON PLAN LAND USE DESIGNATIONS

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

- Schedule 1 - City Structure:
 - 'Primary Major Transit Station Areas';
 - 'Employment Areas';
 - Adjacent to 'Secondary Urban Boulevards' (Kennedy Road South).
- Schedule 2 - Designations:
 - 'Employment'.
- Schedule 13e – Brampton Major Transit Station Areas QUE-2 – Kennedy Land Use Plan:
 - 'Employment (Industrial)';

ADDITIONAL CONCERNS REGARDING FINAL DRAFT BRAMPTON PLAN

GWD has reviewed the final Draft Brampton Plan on behalf of our Client. The concerns raised in previous correspondence (**Appendix 1**), continue to be raised through this submission to the City of Brampton, including the proposed MTSA land use designation (Schedule 13e). We continue to raise the matters related to the Land Use Designation as outlined in the August 28, 2023 correspondence to the City.

With regard to the requested revision, we note that the City is proposing to widen Eastern Avenue to four (4) lanes and introduce bike lanes; this is not compatible with industrial uses as proposed by the City on Schedule 13e. In addition, it is noted that on the west side of Kennedy Road, residential uses, including high rise residential, extend southward beyond the intersection of Kennedy Road South and Eastern Avenue, which have the some context to the employment area as the subject site cited by Brampton staff in their response matrix. Lastly, the proposed land use designation change and proposed development of the subject site, is in keeping with the Brampton Vision 2040 Plan.

In addition, our Client has the following additional concerns as highlighted below:

- General overall comment – in many instances throughout the policy document, references to the Region of Peel have been deleted to reflect the upcoming dissolution of the Region of Peel. However, there are also instances where the reference to the Region of Peel has been left in, including in some cases requirements to seek a Regional Official Plan Amendment. We recommend that the Official Plan be revised to be consistent in referring to the Region of Peel.
- General overall comment – similar to the note above, in many policies through the Final Brampton Plan, references to the Natural Heritage System have been amended to remove the word 'Heritage'; however, there are many instances throughout the Final Brampton Plan, including on the Schedules thereto, where reference is made to the 'Natural Heritage System'. We recommend that the Official Plan be revised to be consistent in referring to the Natural Heritage System.
- General overall comment – in various policies (such as 2.2.3.11 j)), the policy language summarizes various performance standards that are to be regulated through a Zoning By-Law, including among others, materials. A Zoning By-Law is not permitted to regulate



things like materials and colours. Recommend that the Official Plan be revised to remove reference to materials.

- Beginning on page 4-12 (Site and Area Specific Policies) as well as Policy 5.7, contain the Major Transit Station Area policies. Where comments in previous correspondence have not been addressed in the Final Brampton Plan, our previous written comments and concerns (**Appendix 1**) continue to apply.
- Policy 2.1.2.7 refers to all development in conformity with the City-Wide Growth Management Framework, however, there is no section in the Final Brampton Plan under this heading, and no schedule includes this as a designation. It is not clear what this is referring to. We recommend that Staff clarify the intent of this policy.
- The wording of Policy 2.1.2.84 is not clear on how the limits of a Precinct Plan will be determined in the instances noted therein (i.e. where a Secondary Plan does not yet identify the location of Precincts).
- Policy 2.2.6.3 identifies permitted uses within the mixed-use designation, and more specifically, 2.2.6.3 d) speaks to missing middle housing options to support the transition between mixed-use and adjacent designations. The term 'missing middle' is not a defined term in the Brampton Plan, and as such it is not clear what this means. Recommend to delete, and keep the permitted uses that are referenced to the building typologies established in the Plan.
- Within Policy 3.1.2 – Complete Communities is the heading 'Community Hubs'. The policy describes Community Hubs as being, among others, "future-proof" public spaces. What is "future-proof"? In addition, "Community Hubs" are not identified on any Official Plan Schedule – where are they located, and when would these policies apply. We request that staff provide clarification to this policy.
- Policy 3.2.6.2 speaks to requiring 'Adaptation Checklist' for all planning and development activities to expected regional climate impacts. It is not clear what 'Adaptation Checklist' means and how does each planning and development activity supposed to understand or know the expected regional climate impacts. This policy is too vague and not clear in what is intended. We recommend that the policy either be revised to clarify what is intended or to delete the policy.
- Part 3.3 and more specifically, Policy 3.3.1.2 speaks to housing targets. While it is recognized that affordable housing, housing mix and rental housing are targets, to state that the City working with other levels of government will 'work to achieve' these targets is very onerous and not reflective of changing market conditions. We recommend that the policy be amended to provide flexibility in how these targets are achieved.

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



Closing Remarks

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

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

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

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

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

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

Yours truly,

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

cc: Candeco Realty Limited
L. Longo, Aird & Berlis LLP
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.



APPENDIX #1



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

July 20, 2023

GWD File: PN.23.3303.00

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

Attention: Steve Ganesh, Commissioner, Planning, Building and Growth
Management
Michelle Gervais, Policy Planner, City Planning and Design
Claudia LaRota, Supervisor/Principal Planner, City Planning and
Design

Subject: Public Input – Letter of Concern
Brampton Major Transit Station Areas
Draft Kennedy Road Station MTSA Land Use Plan
75 – 77 Eastern Avenue
Candeco Realty Limited

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Candeco Realty Limited ("Candeco"); the Registered Owner of the properties municipally known as 75 & 77 Eastern Avenue in the City of Brampton (hereinafter referred to as the "subject site"). The subject site is located on the south side of Eastern Avenue, between Kennedy Road South and Hansen Road South, and is located within the Kennedy 'Primary' Major Transit Station Area ("MTSA").

Candeco is currently preparing redevelopment plans for the subject site, and a Pre-Application Consultation with City of Brampton Planning Staff is expected to be filed shortly. Candeco is desirous of redeveloping the subject site for a transit-oriented mixed use high-density development in keeping with Brampton Vision 2040, as well as the Mixed Use designation on Schedule 2 of the proposed Draft New City of Brampton Official Plan (December 2022). The proposal and concept plan layout will be refined as we work through the Development Application process.

Candeco is an Appellant of City of Brampton Official Plan Amendment OP2006-247.

Proposed City of Brampton Recommendation Report

We understand that the City of Brampton Planning Department is anticipating the tabling of a Recommendation Report to the July 31, 2023 Planning and Development Committee Meeting to seek Council endorsement of numerous Draft MTSA Land Use Plans,

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including the Draft Kennedy Road Station MTSA Land Use Plan, prior to the preparation of detailed policy associated with these draft Land Use Plans.

Candeco has significant concerns with the advancement of an MTSA Land Use Plan for Council endorsement or adoption, as it is premature in the absence of any associated policy/development framework related thereto.

Kennedy Road Station Draft Land Use Plan

Notwithstanding the concerns noted above, GWD has reviewed the Draft Kennedy Road Station MTSA Land Use Plan that was recently made available on the City of Brampton website (enclosed). Based on our review of this Draft MTSA Land Use Plan, we offer the following comments, observations and recommendations.

- 1. Proposed Land Use Designation and Absence of Associated Land Use Development Policies*** – The subject site is proposed to be designated 'Industrial' pursuant to the Draft Kennedy Road Station MTSA Land Use Plan.

Candeco has significant concerns that no detailed land use planning policy has been advanced in concert with the Kennedy Road Station (MTSA) Draft Land Use Plan. In the absence of any planning policy direction, it is not possible for Candeco to appropriately review, assess and provide input on the Draft Land Use Plan to ensure that in our opinion the proposed land use is consistent/conforms with Provincial, Regional and City policies.

Given its proximity to transit and to contextual considerations, Candeco believes that the subject site should be designated 'High-Rise Mixed-Use.' In this regard, the 'Industrial' designation on the subject site should be re-designated to 'High-Rise Mixed-Use.'

In the absence of any detailed draft land use and development policy associated with the various land use designations and overlays identified on the Draft Kennedy Road Station MTSA Land Use Plan it is our opinion that any consideration of the Draft Kennedy Road Station MTSA Land Use Plan by Planning and Development Committee or City Council is premature.

Closing Remarks

In consideration of the above noted concerns, Candeco does not support the Planning Department's intent to table the Draft Kennedy Road Station MTSA Land Use Plan for Planning and Development Committee/City Council's consideration at this time.

Candeco would welcome the opportunity to meet with City Staff to further discuss its concerns. We reserve the right to provide further comments.

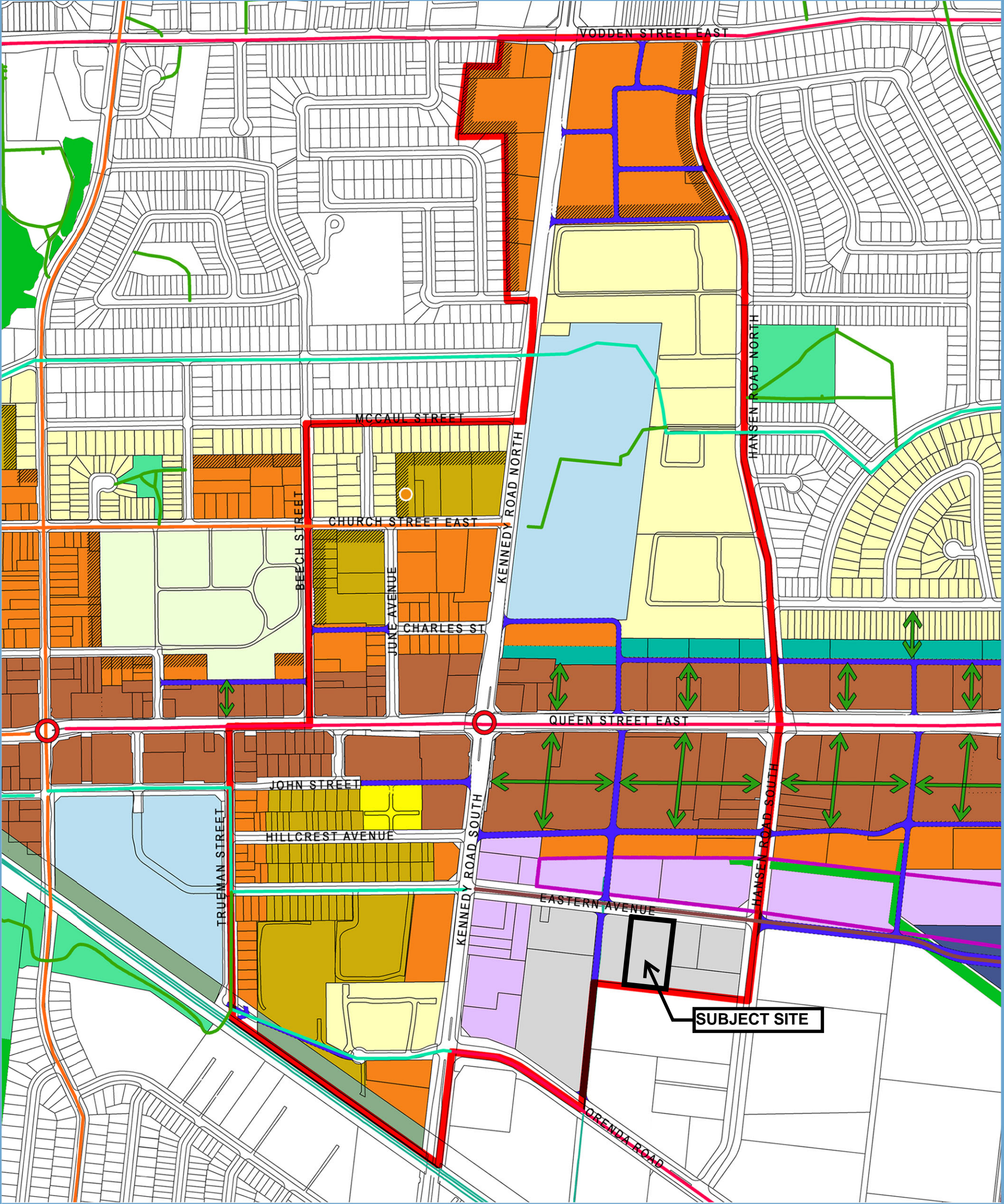


Should you have any questions, please contact the undersigned.

Yours truly,

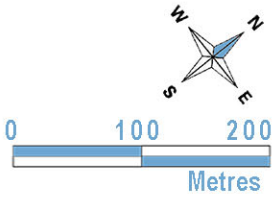
Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Partner and Principal Planner

cc: Candeco Realty Limited
L. Longo, Aird & Berlis LLP
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.



LEGEND

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|---------------------------|---|---|
| LOW-RISE RESIDENTIAL | PROPOSED PUBLIC OR PRIVATE STREET NETWORK | EXISTING ACTIVE TRANSPORTATION NETWORK LINK |
| LOW-RISE PLUS RESIDENTIAL | PROPOSED STREET CONNECTION | PROPOSED MULTI-USE PATH / BOULEVARD PATH |
| MID-RISE RESIDENTIAL | MID-BLOCK CONNECTION | PROPOSED PROTECTED BIKE LANE OR CYCLE TRACK |
| MID-RISE MIXED-USE | PROPOSED LANDSCAPE BUFFER | PROPOSED BIKE LANE OR BUFFERED BIKE LANE |
| HIGH-RISE MIXED-USE | NATURAL HERITAGE SYSTEM | PROPOSED SHARED ROADWAY |
| INSTITUTIONAL | EXISTING OPEN SPACE | RAIL LINE |
| PRESTIGE INDUSTRIAL | EXISTING CEMETERY | SPECIAL POLICY AREA |
| INDUSTRIAL | MTSA BOUNDARY | HEIGHT TRANSITION AREA |
| RAILWAY 30M BUFFER | MTSA STATION | |
| LISTED HERITAGE PROPERTY | | |



POLICY PLANNING | PLANNING, BUILDING AND ECONOMIC DEVELOPMENT | CITY OF BRAMPTON



Principals

Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

August 28, 2023

GWD File: PN.23.3303.00

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

Attention: Mayor and Members of Council
Peter Fay, City Clerk
Steve Ganesh, Commissioner, Planning, Building and Growth
Management
Michelle Gervais, Policy Planner, City Planning and Design
Claudia LaRota, Supervisor/Principal Planner, City Planning and
Design

Subject: Public Input – August 28 Planning Committee
Statutory Public Meeting – Major Transit Station Areas
Draft Brampton Plan Policies and
Draft Kennedy Road Station MTSA Land Use Plan
75 – 77 Eastern Avenue
Candeco Realty Limited

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Candeco is an Appellant of City of Brampton Official Plan Amendment OP2006-247.

City of Brampton Information Report

We understand that the City of Brampton Planning Department is tabling an Information Report to the August 28, 2023 Planning and Development Committee Meeting, including the holding of a Statutory Public Meeting in connection with the proposed MTSA policies and schedules as part of the future Official Plan Amendment recommending adoption of Brampton Plan. Public input on the proposed policies is being sought at the Statutory Public Meeting.

Candeco continues to have significant concerns with the advancement of Kennedy MTSA Land Use Plan for Council endorsement or adoption with respect to the subject site.

Kennedy Road Station Draft Land Use Plan and Proposed Policies

GWD has reviewed the August 28, 2023 Information Report, including the proposed MTSA Policies and the revised Draft Kennedy Road Station MTSA Land Use Plan. Based on our review, we offer the following comments, observations and recommendations.

1. ***Proposed Land Use Designation*** – The subject site continues to be proposed to be designated 'Industrial' pursuant to the Draft Kennedy Road Station MTSA Land Use Plan, as noted in the August 28, 2023 Staff Report and Response to Comments in Appendix 5 attached thereto.

Candeco has significant concerns that no detailed land use planning policy has been advanced in concert with the Kennedy Road Station (MTSA) Draft Land Use Plan. In the absence of any planning policy direction, it is not possible for Candeco to appropriately review, assess and provide input on the Draft Land Use Plan to ensure that in our opinion the proposed land use is consistent/conforms with Provincial, Regional and City policies.

Given its proximity to transit and to contextual considerations, Candeco continues to believe that the subject site should be designated 'Neighbourhood (High-Rise Residential).' In this regard, the 'Industrial' designation on the subject site should be re-designated to 'High-Rise Mixed-Use.' The current uses proposed on the Draft Land Use Plan are contrary to the Brampton Vision 2040, as well as the Mixed-Use designation on Schedule 2 of the proposed Draft New City of Brampton Official Plan (December 2022).

2. ***Proposed MTSA Policies*** – It is unclear how the Interim Policies of OPA2006-247 are being integrated with these proposed policies. There are various criteria from the Interim policies on guiding development applications that are not part of



these proposed policies. It would appear that the proposed MTSA policies for inclusion in the future Brampton Plan as outlined in Appendix 1 to the August 28, 2023 Information Report is incomplete. The full set of proposed policies should be brought forward, as opposed to a piecemeal fashion.

Closing Remarks

In consideration of the above noted concerns, Candeco does not support the Draft Kennedy Road Station MTSA Land Use Plan or proposed policies for the Planning and Development Committee/City Council's consideration at this time.

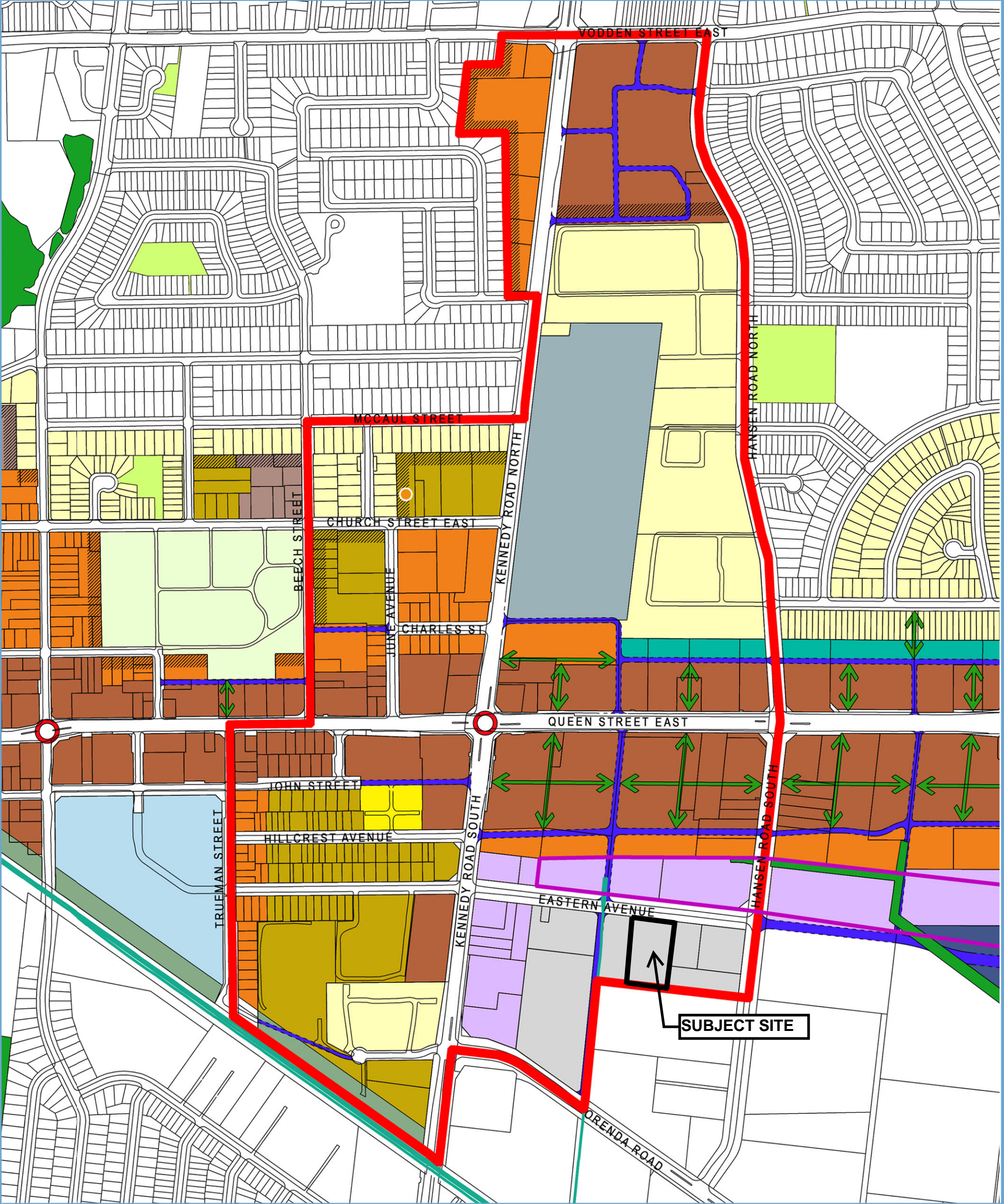
Candeco would welcome the opportunity to meet with City Staff to further discuss its concerns. We reserve the right to provide further comments.

Should you have any questions, please contact the undersigned.

Yours truly,

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

cc: Candeco Realty Limited
L. Longo, Aird & Berlis LLP
M. Gagnon, Gagnon Walker Domes Ltd.
A. Sirianni, Gagnon Walker Domes Ltd.
H. Singh, Gagnon Walker Domes Ltd.



LEGEND

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| NEIGHBOURHOOD (LOW-RISE RESIDENTIAL) | EMPLOYMENT (PRESTIGE INDUSTRIAL) | PROPOSED PUBLIC OR PRIVATE STREET NETWORK |
| NEIGHBOURHOOD (LOW-RISE PLUS RESIDENTIAL) | EMPLOYMENT (INDUSTRIAL) | MID-BLOCK CONNECTION |
| NEIGHBOURHOOD (MID-RISE RESIDENTIAL) | NATURAL HERITAGE SYSTEM | LISTED HERITAGE PROPERTY |
| NEIGHBOURHOOD (HIGH-RISE RESIDENTIAL) | PARKS AND OPEN SPACE (NEIGHBOURHOOD PARK) | RAIL LINE |
| NEIGHBOURHOOD (INSTITUTIONAL) | PARKS AND OPEN SPACE (CEMETERY) | HEIGHT TRANSITION AREA |
| MIXED-USE (MID-RISE MIXED-USE) | PROPOSED LANDSCAPE BUFFER | MTSA BOUNDARY |
| MIXED-USE (HIGH-RISE MIXED-USE) | RAILWAY 30M BUFFER | MTSA STATION |
| MIXED-USE (INSTITUTIONAL) | SPECIAL POLICY AREA | |
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POLICY PLANNING | PLANNING, BUILDING AND ECONOMIC DEVELOPMENT | CITY OF BRAMPTON

BRAMPTON MAJOR TRANSIT STATION AREAS
KENNEDY ROAD STATION DRAFT LAND USE PLAN

DRAFT FOR REVIEW ONLY

AUGUST 2023