



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

September 9, 2024

GWD File: PN.22.3303.00

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

**Attention: Mayor and Members of City of Brampton Planning and Development Committee/City Council**

**- and -**

**Genevieve Scharback, City Clerk**

**Subject: PUBLIC INPUT – LETTER OF CONCERN  
75 – 77 Eastern Avenue  
Candeco Realty Limited  
Item 5.1: September 9, 2024 Planning and Development Committee Meeting; Information Report: Primary Major Transit Station Areas – City-Initiated Official Plan Amendments**

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 QUE-2 Kennedy 'Primary' Major Transit Station Area ("MTSA"). An aerial photo illustrating the location of the subject site is in **Appendix 1**.

We would like to take this opportunity to express Candeco's concerns regarding the City Staff Report entitled "Information Report: Primary Major Transit Station Areas – City-Initiated Official Plan Amendments; Queen Street Corridor Secondary Plan Area 36, Bram West Secondary Plan Area 40, The Gore Secondary Plan Area 41, Mount Pleasant Secondary Plan Area 51", along with its various attachments including:

- The Draft Official Plan Amendment ("OPA");
- New Draft Queen Street Transit Corridor Secondary Plan Area 10 ("Queen Street Secondary Plan");
- New Queen East Precinct Plan ("Precinct Plan"); and
- New Draft Queen East Precinct Plan Guidelines ("Precinct Plan Guidelines" or the "Guidelines").

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**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W 0B4 • P: 905-796-5790  
www.gwdplanners.com • Toll Free: 1-855-771-7266

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The Information Report is scheduled to be considered at the September 9, 2024 City of Brampton Planning and Development Committee Meeting.

We request the opportunity for City staff to meet with Candeco and its core consulting team at its earliest opportunity to discuss the concerns as outlined herein; including, but not limited to: the proposed OPA's, the Queen Street Secondary Plan policies, Precinct Plan elements, and the Guidelines' inconsistency with City Council's previous approval of the MTSA Land Use Schedule in the new Brampton Official Plan, and with the plans prepared and shared to-date with City Staff through Pre-Consultation Application PRE-2024-0055 for the comprehensive redevelopment of the subject site.

## **BACKGROUND**

### **Candeco's Engagement in City of Brampton Official Plan Review Process**

Candeco has been actively engaged in the City's Official Plan Review process and associated MTSA Planning Study. This has included, but is not limited to, Candeco's participation in the Kennedy MTSA Focus Group Session that was hosted by City Staff on March 23, 2023, and through formal written correspondence prepared by GWD on behalf of Candeco to the City's Planning and Development Committee dated July 20, 2023, August 28, 2023, October 20, 2023, April 8, 2024 and July 8, 2024, along with separate written submissions made by Aird & Berlis LLP.

### **Candeco Re-Development Proposal**

Candeco is currently preparing redevelopment plans for the subject site. 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 New City of Brampton Official Plan (December 2022).

Candeco is preparing redevelopment plans also as a result of the City's 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 filed a Pre-Application Consultation request with City Planning Staff on April 8, 2024 (City File No. PRE-2024-0055), and participated in a Pre-Consultation Meeting on May 29, 2024. Candeco currently plans to redevelop the subject site with a transit-oriented mixed use high-density residential development with two (2) new tall buildings. A copy of the proposed Concept Plan and Massing Plan submitted with the Pre-Consultation Application is included in **Appendix 2**. A formal Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are scheduled to be submitted to the City in early 2025.

### **Candeco's Appeal of Brampton Plan**

On June 4, 2024, Candeco appealed the City's/Regional Council's adoption of the new Brampton Official Plan to the Ontario Land Tribunal ("OLT") in light of Candeco's concerns





with the Brampton Plan having not been sufficiently addressed prior to its adoption (OLT-000688). Candeco's concerns with the Brampton Plan include, but are not limited to, compatibility and transition requirements that render appropriate intensification unduly difficult, including policies that would limit densities and heights alongside major investments in transit infrastructure.

### **Candeco's Appeal of City of Brampton Official Plan Amendment OP2006-247**

Candeco has also appealed the City's decision to adopt Official Plan Amendment OP2006-247, being the Interim MTSA policies to the 2006 Brampton Official Plan, to the OLT (OLT-23-00609).

### **CITY of BRAMPTON INFORMATION REPORT and STATUTORY PUBLIC MEETING**

The City of Brampton Planning Department is holding a Statutory Public Meeting and is tabling the Information Report to the September 9, 2024 Planning and Development Committee Meeting. The purpose of the Statutory Public Meeting is for City Staff to present proposed City-Initiated OPA's to the Queen Street Corridor Secondary Plan, Hurontario-Main Corridor Secondary Plan and other Secondary Plans to include a new proposed policy framework for twelve (12) of the City's MTSA's.

Public input on the proposed OPA's is being sought by the City at the Statutory Public Meeting in advance of their consideration for final adoption by City Council, which is currently targeted in November 2024.

### **OVERVIEW of CANDECO'S COMMENTS and CONCERNS**

The following provides an overview of Candeco's preliminary concerns with the City Planning Department's Information Report; including: the proposed OPA pertaining to the Draft Queen Street Secondary Plan, Draft Precinct Plan and Draft Precinct Plan Guidelines.

The Strategic Transportation and Master Stormwater Study for the City of Brampton Major Transit Station Area (MTSA) Policy Framework, completed by Arup Canada Inc. is contained in Attachment 2 of the Information Report ("Transportation/SWM Study"). Given the technical nature of the Transportation/SWM Study, Candeco reserves the right to make additional submissions to the City on this document at a later date.

### **General Comments and Concerns**

- OPA is Premature – As a result of the various appeals to the Brampton Plan, including that filed by Candeco, the Brampton Plan is not in full force and effect. We understand that the City's Planning Department anticipates tabling a Final Recommendation Report to seek City Council endorsement of the proposed OPA, Draft Queen Street Secondary Plan, Draft Precinct Plan and Draft Precinct Plan Guidelines in November 2024.





Candeco has a fundamental concern about the prematurity of any City Council endorsement or adoption of the OPA and related planning documents noted above in the absence of the resolution of Candeco's and others' OLT Appeals to the Brampton Plan and Official Plan Amendment OP2006-247.

- *Disregard for Candeco Proposed Concept Plan* – the Draft OPA, Secondary Plan policies, Precinct Plan and Guidelines disregard and are inconsistent with the Candeco Concept Plan which was reviewed and assessed through a formal Pre-Application Consultation with City of Brampton Planning Staff on May 29, 2024 (City File No. PRE-2024-0055). A formal Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are scheduled to be submitted to the City of Brampton in early 2025.
- *Fails to Recognize Previous Candeco Concerns* – The Draft OPA, Secondary Plan policies, Precinct Plan and Guidelines fail to address Candeco's previous concerns, as identified through the Brampton Plan and MTSA/Precinct Planning Study.

### **Comments and Concerns with Information Report**

- *Inaccurate Summary of the Extent of the OPAs* – We note that the title of the Information Report, Staff Recommendation 1, and Pages 2 and 6 are inaccurate, as they fail to properly make reference to the full range of existing Secondary Plans that are impacted by City Staff Recommendations and the associated OPAs.
- *Status of Brampton Plan MTSA Land Use Plan/OLT Appeal* – Bullet 1 of the Overview Section on Page 1 and the Background Section of the Information Report notes that sixteen (16) OLT Appeals were filed in connection with City Council's adoption of the Brampton Plan; however, the Information Report suggests that only the Bramalea GO MTSA and Gateway Terminal MTSA land use schedules of the Brampton Plan are subject to these OLT Appeals. This statement is incorrect, as the scope of Candeco's OLT Appeal of the Brampton Plan also includes the Kennedy MTSA Land Use Plan (Schedule 13e).
- *Maximum Height and Density Permissions/Restrictions* – We acknowledge the statements on Pages 2 and 6 of the City's Information Report, which clarify that maximum building height and density policies and schedules will not be included in the Draft Secondary Plans/OPAs, and only contain general guiding policies on built form and density. The Information Report further clarifies that the conceptual diagrams/figures and design guidelines identified within the Precinct Plan Guidelines are provided for illustrative purposes only, and are not to be considered determinative or policy during the review of formal development proposals. Specific maximum building height and density is intended to be determined through the future Zoning By-law/Zoning By-law Amendments only.

Notwithstanding, based on our review of the Draft Secondary Plan, it is our position that the OPAs and Draft Secondary Plans do not effectively or clearly make this distinction between the non-policy intent of the Precinct Plan and Guidelines. It is our opinion that if





the Precinct Plan Guidelines are intended to be treated as guidelines only, and not policy, they should not form any part of the Secondary Plan Policy other than through reference as a standalone Guideline that is to be considered during the review of development applications.

### **Comments and Concerns with the Draft Queen Street Transit Corridor Secondary Plan Area 10**

#### **OPA**

- **Typographic Error** – Sections 2.2 a) and 2.4 a) of the OPA contain typographic errors. Specifically, these Sections reference the wrong Schedules of the OPA.
  - **Requested Modification: Revise Section 2.2 a) to reference Schedule E to the OPA, and revise Section 2.4 a) to reference to Schedule C of the OPA.**
- **Absence of Land Use Plan** – Section 2.6 of the OPA proposes the deletion of the Queen Street Corridor Secondary Plan in its entirety and its replacement with the new proposed Queen Street Transit Corridor Secondary Plan. However, the OPA and Secondary Plan fail to include a Land Use Plan for the new proposed Secondary Plan. In the absence of a Land Use Plan, conformity between the Brampton Plan, the Secondary Plan and Precinct Plan Guidelines cannot be determined.
  - **Requested Modification: Include Secondary Plan Land Use Plan Schedule to the OPA and Draft Queen Street Transit Corridor Secondary Plan.**
- **Precinct Plan Policy and Precinct Plan Guidelines** – It is our understanding that Section 12.0 and the policies of the 'Queen East Precinct Plan – Area 10-1', and Schedule 10(a): Queen East Precinct Plan are intended to form Secondary Plan policy, whereas Appendix A, being the Precinct Plan Guidelines are intended to be utilized as development guidelines that conceptually illustrate the City's general intent of the aforementioned proposed Secondary Plan policies. However, the title of Appendix A does not include a specific reference to it being a guideline document, which is confusing.
  - **Requested Modification: Revise the title of Appendix A to read as follows: "Queen East Precinct Plan Guidelines".**

#### **Section 1.0 – Introduction**

- Policy 1.2 iii) states that the Secondary Plan will include Precinct Plans that provide explanatory goals and illustrative graphics. As no illustrative graphics are provided on Schedule 10(a), being the actual Queen East Precinct Plan, we assume this Policy is referencing the illustrative graphics contained within the Precinct Plan



Guidelines. As the Guidelines are not to be considered policy, they should form a separate document to the Secondary Plan.

- **Requested Modification: Revise Policy 1.2 iii) to refer to the Precinct Plan Guidelines, rather than the Precinct Plans, and clarify that the Guidelines do not form part of the Secondary Plan.**

#### Section 4.0 – Land Use

- Policy 4.0 c) states that “The Zoning By-law, in conjunction with the Urban Design Guidelines will establish the minimum criteria for assessing the suitability of an individual site for each land use designation.” The proposed policy language indicates that the suitability of a land use designations will be determined by the Zoning By-law and Urban Design Guidelines. However, a Zoning By-law is required to conform to and implement the land use designations already identified within the applicable Official Plan/Secondary Plan.

- **Requested Modification: Delete the last sentence of Policy 4.0 c).**

#### Section 5.0 – Built Form, Height and Density

- Policy 5.1 d) i) outlines certain built form and environmental impact considerations pertaining to tall buildings.

- **Requested Modification: Revise Policy 5.1 d) i) by including the word “adverse” between the words “mitigate” and “environmental impacts”.**

- Policy 5.1 e) ii) stipulates that service and parking facilities shall be integrated into proposed buildings, which prohibits the ability for developments to provide limited surface parking where deemed appropriate through the detailed design process.

- **Requested Modification: Revise Policy 5.1 e) ii) to permit limited off-street surface parking, as determined to be appropriate at the detailed design stage.**

- Policy 5.2 c) stipulates that the maximum building height and density permissions that are to be included within the Zoning By-law will be restricted to the range of heights and density distribution as illustrated in the Precinct Plan Guidelines. This Policy should be deleted as it is inconsistent with City Staff’s previously stated intention that: i) maximum building heights and densities will not be established within the Secondary Plan, and ii) that the Precinct Plan Guidelines are illustrative only and are not intended to form planning policy. As worded, Policy 5.2 c) provides very rigid policy restrictions on potential building heights and density distribution that are inconsistent with Candeco’s Master Plan proposal.

- **Requested Modification: Delete Policy 5.2 c).**





- Policy 5.2 d) identifies criteria that must be met in order to consider building heights and densities beyond those prescribed by the Zoning By-law for only those lands designated 'Neighbourhood (High-Rise Residential)' or 'Mixed-Use (High-Rise Mixed-Use)'. This Policy suggests that any Zoning By-law Amendment Application that proposes an increase in height or density on lands that are not designated either 'Neighbourhood (High-Rise Residential)' or 'Mixed-Use (High-Rise Mixed-Use)' may not be considered. This is inconsistent with the *Planning Act*, which provides proponents with the legal right to make applications for Council's consideration pertaining to a proposed change in land use and/or an increase in height or density for all designations.

Additionally, the criterion identified in this draft Policy is overly prescriptive as it requires proposals to meet all stipulated policies rigidly. Flexibility should also be included within the policy language to allow for the general and overall intent of the criterion to be achieved rather than the strict adherence to each and every listed development criteria.

Further, the City-initiated Zoning By-law that is intended to implement the Brampton Plan and Secondary Plans is not scheduled to be released by City Staff for initial public review and comment until 2025. Therefore, it is not possible for Candeco to assess the appropriateness of this Policy and provide meaningful comment in the absence of understanding what Zoning prescriptions are proposed from a height and density perspective.

➤ **Requested Modification: Delete Policy 5.2 d).**

### Section 6.0 – Public Realm

- Policy 6.0 d) is incomplete.

### Section 7.0 – Mobility and Transportation

- Policy 7.1 b) speaks to the creation of a public street network as “generally illustrated” on Precinct Plan Schedule 10(a). Flexibility should be included into the policy language to confirm that deviations to the illustrated public street network will not require an amendment to the Precinct Plan Schedule/Secondary Plan.

➤ **Requested Modification: Revise Policy 7.1 b) to include the following wording at the end of the Policy: “changes to the location or alignment of the street network will not require an amendment to this Plan provided that its general intent and purpose is maintained”.**

- Policy 7.1 e) directs that new public streets within the subject site shall be 20 metres in width and that the cross-section for these public rights-of-way are contained within the Precinct Plan Guidelines.

➤ **Requested Modification: Revise Policy 7.1 e) to replace the words “is found in Appendix A to this Plan” with “is conceptually illustrated in**



**the Precinct Plan Guidelines. The ultimate cross-section shall be determined at the detailed design stage”.**

- Policy 7.1 g) stipulates that private streets shall provide a minimum pavement width of 7.0 metres plus sidewalks on both sides of the private street, plus active transportation elements, plus landscaped boulevards. This requirement for private streets is excessive and goes well beyond the function of a private street/laneway, which typically range between 6.0 to 7.0 metres in width. Private streets and laneways, and their functional requirements, should be determined at the detailed design stage.

➤ **Requested Modification: Delete Policy 7.1 g).**

- Policy 7.1 h) requires that Mid-Block Connections shall have a minimum width of 15.0 metres. The typical function of a Mid-Block Connection is to provide passive active transportation linkages between streets and places of destination. On this basis, the minimum 15.0 metre requirement to provide pedestrian linkages throughout the Precinct Plan is excessive and unnecessary. Further, we question why Figure 5.3.3 S3 of the Precinct Plan Guidelines pertaining to Mid-Block Connections includes automobile lanes.

➤ **Requested Modification: Delete Policy 7.1 h).**

- Policy 7.3 b) prohibits at-grade parking fronting a street. The location of parking should be flexible and determined at the detailed design stage on a case-by-case basis.

➤ **Requested Modification: Revise Policy 7.3 b) to replace the words “shall not be” with “are discouraged to be”, and the following words added to the end of the Policy: “limited at-grade parking fronting a street may be considered on a case-by-case basis, to be determined at the detailed design stage”.**

#### Section 10.0 – Sustainability

- Policy 10.0 a) requires Draft Plan of Subdivision and Site Plan Applications to achieve a minimum Sustainability Score Threshold of ‘Silver’. Insufficient justification has been provided to require that sites within MTSA’s need to meet a higher Sustainability Score Threshold than all other areas of the City. Additionally, transition policies should be incorporated into the policy language to exempt active applications and allow upcoming planning applications to be reviewed and processed based on the current ‘Bronze’ Sustainability Score Threshold requirement.

➤ **Requested Modification: Delete Policy 10.0 a) and replace with the following: “New Draft Plan of Subdivision and Site Plan Applications submitted after January 2027 must achieve a minimum Sustainability Score that falls within the Silver Sustainability Score Threshold”.**





- Policy 10.0 b) requires that development advance the implementation and achievement of low/zero carbon energy, district energy systems, renewable and alternative, and other sustainable development measures. This requirement should be aspirational and the policy language should be revised to reflect this.
  - **Requested Modification: Revise Policy 10.0 b) to replace the words “Development will” with “Development is encouraged to”.**
- Policy 10.0 c) requires that new development facilitate transit electrification in the design of buildings. This Policy is inappropriate as it is not the responsibility of private development proposals or development proponents to facilitate transit electrification through building development.
  - **Requested Modification: Delete Policy 10.0 c) and replace with the following: “Development is encouraged to facilitate the provision of vehicle charging infrastructure”.**

### Section 12.0 – Precinct Plans

In accordance with Schedule B to the OPA, the subject site is located within the ‘Queen East Precinct Plan Area 10-1’.

Schedule 10(a), being the ‘Queen East Precinct Plan’ (following the Precinct Plan Area 10-1 policies) does not include a title or legend to explain the various overlays provided on the Schedule. In order to be able to provide comment on the Precinct Plan, a legend must be included.

Candeco has serious concerns with the Kennedy MTSA Land Use Schedule, Queen Street Corridor Secondary Plan Land Use Schedule and the Queen East Precinct Plan, as they relate to the subject site, as follows:

- *Disregard of Previous Candeco Pre-Consultation Application and Submission Letters* – The Precinct Plan and related policies disregard and are inconsistent with the Candeco Pre-Consultation Application recently reviewed and assessed with City Staff on May 29, 2024 (City File No. PRE-2024-0055), upon which a formal Official Plan, Zoning By-Law Amendment and Draft Plan of Subdivision Applications are being prepared and soon to be filed with the City. The Draft Precinct Plan (Schedule and Policies) should be revised to recognize and implement the specific land use and development policies pursuant to Candeco’s redevelopment plans for the subject site.

More specifically, and as requested in previous Public Input Letters in connection with the MTSA’s and Brampton Plan, we request that the designation of the Candeco lands be changed from “Industrial” to “Mixed-Use (Mid-Rise Mixed-Use)”. The current uses are low density industrial/commercial uses that are now in a state of transition and are considered an underutilization of the lands.





The underutilization of the lands and infrastructure is further exacerbated by the planned widening of Eastern Avenue to four (4) lanes with bicycle lanes, ultimately connecting with the extension of Clark Boulevard, providing direct access to Highway 410 and beyond. They are better utilized for redevelopment for greater density, heights and uses such as a mix of residential and employment uses. The proposed widening of Eastern Avenue poses a safety issue for industrial users (trucks).

Further, the City report speaks to the preservation of employment uses. As noted earlier, the lands along Eastern Avenue are underutilized, and low density in terms of number of jobs (low floor space per worker ratios). The requested mixed-use mid-rise designation, and more specifically the Candeco Concept Plan, will result in more jobs being brought to the site than currently exists. The Candeco proposal is better suited for the widened Eastern Avenue from the perspective of: Safety, Enhanced Employment, Additional Housing, Enhanced Land Utilization and Enhanced Infrastructure Utilization.

A review of the various plans contained within the Draft Queen East Precinct Plan Guidelines in Appendix A, along with proposed revisions to the various plans, are discussed in the next section of this letter.

- Policy 12.1 references “the policies of Chapters 12-1 and 12-2 of this Plan”. Chapters 12-1 and 12-2 are not specifically labelled in the Secondary Plan. We assume Chapter 12-1 refers to the policies of the Queen East Precinct Plan – Area 10-1. This should be clarified in the Secondary Plan and labelled accordingly.

➤ **Requested Modification: Revise Policy 12.1 to clearly identify Chapters 12-1 and 12-2.**

#### **Comments and Concerns with the Draft Queen East Precinct Plan Guidelines (Appendix A)**

- Precinct Plan Policy and Precinct Plan Guidelines – As noted above, it is our understanding that Appendix A, being the Precinct Plan Guidelines, are intended to be utilized as development guidelines that conceptually illustrate the City’s general intent of the proposed Secondary Plan policies. However, the title of Appendix A does not include a specific reference to “Guidelines”.

➤ **Requested Modification: Revise the title of Appendix A to read as follows: “Queen East Precinct Plan Guidelines”.**

- Disclaimer – We acknowledge the disclaimer within the Precinct Plan Guidelines, which confirms that “The images, illustrative renderings and the potential development scenarios contained in the Queen East Precinct Plan are meant to show examples and are one of many potential development approaches to achieve transit-oriented development. The images do not imply that development will occur or can be approved exactly as shown”.





- **Requested Modification:** Revise the last sentence of the Disclaimer to read as follows: “The images, illustrative renderings, potential development scenarios, building heights, density distribution, street network and open space network contained herein do not imply that development will occur exactly as shown. The Queen East Precinct Plan Guidelines are intended to inform, but are not formally part of, the Queen Street Transit Corridor Secondary Plan”.
- MTSA Land Use Schedule – Section 1.0 of the Guidelines includes the MTSA Land Use Schedule. Candeco requests that, for the reasons set out above and in all previous public input letter, to re-designate the subject site, and the lands north and south of Eastern Avenue from Hansen Road to Kennedy Road from “Industrial” to “Mixed-Use (Mid-Rise Mixed-Use)”.

The following revisions are requested (see **Detail A** in **Appendix 3** of this letter):

- **Requested Modification:** Replace “Industrial”, “Employment (Prestige Industrial)” and “Special Policy Area” to “Mixed-Use (Mid-Rise Mixed-Use)” on the subject site and the adjacent lands north and south of Eastern Avenue from Hansen Road to Kennedy Road, from the Land Use Schedule contained within Figure 1.2.
- Precinct Plan – Section 3.2 of the Guidelines includes the Precinct Plan. Candeco’s concerns with the Precinct Plan are outlined above. It seems odd that this MTSA has a small sliver of Employment within the boundaries, whereas most others do not. Identifying this area as a mixed-use residential area will allow jobs to be created while providing residential in a compact, efficient manner that results in an increased level of intensification on a road that is planned to be widened. This change to the Mid-Rise (Mixed-Use) designation seeks to implement Provincial, Regional and Local planning objectives in connection with providing jobs/employment, as well as much needed residential units.

The following revisions are requested (see **Detail B** in **Appendix 3** of this letter):

- **Requested Modification:** Replace the “Eastern Employment District” designation on the subject site and along the north and south sides of Eastern Avenue from Hansen Road to Kennedy Road with “Mid Rise” designation on the Precinct Plan contained within Figure 3.2.1.
- Demonstration Plan – Page 24 of the Guidelines includes the Demonstration Plan (Figure 3.4.2). Candeco has concerns with the Demonstration Plan, insofar as being the requested revisions are inconsistent with the MTSA Land Use Schedule, and the proposed Candeco Concept Plan included with the Pre-Consultation Application.





The following revisions are requested (see **Detail C** in **Appendix 3** of this letter):

- **Requested Modification: Replace the conceptual building layout within the subject site to reflect the proposed Candeco Concept Plan as included on the plans submitted with the Pre-Consultation Application and future Formal Amendment Application on the Demonstration Plan contained within Figure 3.4.2.**
- Character Areas – Pages 30 and 31 of the Guidelines provide a brief overview of the desired objectives for each Character Area within the Precinct Plan. As it relates to the subject site, it is more appropriately within the Mid Rise Area, consistent with the requested revisions to the Land Use Schedule.

The following revisions are requested (see **Detail D** in **Appendix 3** of this letter):

- **Requested Modification: Revise the Character Area designation of the subject site from “Eastern Employment District” to “Mid-Rise” on the subject site and along the north and south sides of Eastern Avenue from Hansen Road to Kennedy Road on the Character Areas Plan contained within Figure 3.5.3.**
- Proposed Building and Podium Heights – Figure 4.4.2 of the Guidelines provide a conceptual Building and Podium Heights plan. Unlike the Density Distribution Plan in Figure 4.5.1 of the Guidelines, it is not clear on Figure 4.4.2 as to the extent of the area subject to any of the proposed height ranges. In addition, the Schedule does not provide heights for all parcels, including lands with approved applications, which is misleading.

The following revisions are requested (see **Detail E** in **Appendix 3** of this letter):

- **Requested Modification: Replace the building outlines and heights to reflect the Candeco proposed Concept Plan, and apply the “9-12 storey” designation to the subject site, on the Height Distribution Plan contained within Figure 4.4.2.**
- Proposed Density Distribution – Figure 4.5.1 of the Guidelines provide a conceptual Density Distribution plan. In addition, the Schedule does not provide densities for all parcels, including lands with approved applications, which is misleading.

The following revisions are requested (see **Detail F** in **Appendix 3** of this letter):

- **Requested Modification: Replace the proposed density of the subject site from “no category” to “4 FSI”, to reflect the Candeco proposed Concept Plan.**
- Street Hierarchy and Typologies – Section 5.3 of the Guidelines identifies a series of illustrative cross-sections of potential streets within the Precinct Plan. It is





understood that these cross-sections are conceptual and that the final cross-section applicable to development applications will be confirmed at the detailed design stage.

### **Closing Remarks**

As summarized above, Candeco has concerns with the proposed OPA and associated Queen Street Transit Corridor Secondary Plan, Queen East Precinct Plan, and Queen East Precinct Plan Guidelines. We request that City Staff meet with Candeco and its core consulting team to discuss the concerns as outlined herein prior to City Staff bringing forward a final Recommendation Report for City Council approval.

We reserve the right to provide additional comments to the City of Brampton in connection with this matter prior City Council's consideration of the final Recommendation Report.

By way of this correspondence, we also respectfully request to be notified in writing of all future formal/information public meetings and open houses, as well as the tabling of any future Information and/or Recommendation Report(s) to Planning and Development Committee and/or City Council in connection with this matter; including all Notices of Decision.

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.  
S. Ganesh, City of Brampton  
M. Kallideen, City of Brampton  
H. Zbogor, City of Brampton  
M. Gervais, City of Brampton  
A. Sepe, City of Brampton