



Principals

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September 9, 2024

GWD File: PN.21.2941.00

**The Corporation of the City of Brampton
Planning and Development Committee
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
261 & 263 Queen Street East – Soneil Mississauga Inc. and Soneil Oakville Inc.
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 Soneil Mississauga Inc. and Soneil Oakville Inc. (“Soneil”); the registered owner of the properties municipally known as 261 & 263 Queen Street East in the City of Brampton (“subject site”). The subject site is located at the southwest corner of Queen Street East and Rutherford Road South, and is located within the Rutherford ‘Primary’ Major Transit Station Area (“MTSA”) and the City of Brampton’s Urban Growth Centre.

We write to provide comments and identify Soneil’s preliminary concerns regarding the July 31, 2024 Information 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, and” [sic], and its various attachments; including the Draft Official Plan Amendment (“OPA”), Draft Queen Street Transit Corridor Secondary Plan Area 10 (“Queen Street Secondary Plan” or the “Secondary Plan”), Draft Queen East Precinct Plan (“Precinct Plan”), and Draft Queen East Precinct Plan Guidelines (“Precinct Plan Guidelines” or the “Guidelines”). The Information Report is scheduled to be considered at the September 9, 2024 City of Brampton Planning and Development Committee Meeting.

We request that City Staff meet with Soneil and its core consulting team at its earliest opportunity to discuss Soneil’s concerns pertaining to the proposed OPA and associated Queen Street Secondary Plan, Precinct Plan, and Precinct Plan Guidelines.

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BACKGROUND

Soneil's Engagement in the City of Brampton Official Plan Review Process

Soneil has been actively engaged in the City of Brampton's Official Plan Review process and associated MTSA Planning Study. This participation has included written correspondence provided to the City of Brampton and Region of Peel, including letters dated June 14, 2022, July 18, 2023, August 28, 2023, October 23, 2023, April 7, 2024, and May 8, 2024.

Soneil also participated in the Rutherford MTSA Focus Group Session hosted by City Staff on March 23, 2023, and most recently the Public Open House for the Rutherford MTSA held by City Staff on May 14, 2024, in connection with Phase 2b of the City of Brampton MTSA Planning Study. At the May 14, 2024, Public Open House meeting, GWD expressed a series of questions and concerns to City Staff on behalf of Soneil in relation to the City's ongoing Precinct Plan, Secondary Plan, and Zoning review.

Soneil's Pre-Application Consultation Meeting

Soneil participated in a Pre-Application Consultation meeting with City Planning Staff (City File No. PRE-2022-0158) in connection with Soneil's proposed redevelopment of the subject site with a transit oriented, mixed use Master Plan generally comprised of private open spaces, new public and/or private streets, one (1) 12-storey mid-rise building, and six (6) high-rise buildings ranging in height from 29 storeys up to a maximum of 46 storeys at the intersection of Queen Street East and Rutherford Road South. Ground floor street-oriented retail uses are proposed to be developed along Queen Street East. Soneil is in the process of coordinating a development application(s) towards the implementation of its Master Plan vision in either 2024 or early 2025.

Soneil's Appeal of Brampton Plan

On June 5, 2024, Soneil appealed Regional Council's approval of the new "Brampton Plan" to the Ontario Land Tribunal ("OLT") in light of the fact that Soneil's concerns with the Brampton Plan had not been sufficiently addressed prior to the Region of Peel's approval (OLT-24-000688). Soneil's concerns with the Brampton Plan include, but are not limited to, the subject site's categorization within the City Structure, street network, urban design policies, maximum building height and density policies within MTSA's and precinct planning.

Soneil's Appeal of City of Brampton Official Plan Amendment OP2006-247

Soneil has also appealed Official Plan Amendment OP2006-247, being the City of Brampton's interim MTSA policies to the 2006 Brampton Official Plan, to the OLT (OLT-23-000609).



CITY of BRAMPTON INFORMATION REPORT and STATUTORY PUBLIC MEETING

The City of Brampton 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 OPAs 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.

The City is seeking public input on the proposed OPAs at the Statutory Public Meeting in advance of final adoption by City Council, which is currently targeted for November 2024.

SONEIL’S COMMENTS and CONCERNS

The following provides an overview of Soneil’s preliminary concerns with the 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 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, Soneil 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 OLT Appeals to the Brampton Plan, including that filed by Soneil, 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.

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

- **Fails to Recognize Previous Soneil Concerns** – The Draft OPA, Secondary Plan policies, Precinct Plan and Precinct Plan Guidelines fail to adequately address Soneil’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 the Regional approval 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 Soneil’s OLT Appeal of the Brampton Plan includes the Rutherford MTSA Land Use Plan (Schedule 13f).
- *Maximum Height and Density Permissions/Restrictions* – We acknowledge the statements on Pages 2 and 6 of the Information Report, which clarifies 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 are intended to be determined through the future Zoning By-law/Zoning By-law Amendments only.

Notwithstanding, based on our review of the Draft Queen Street 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 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 Secondary Plan policy other than through reference as a standalone guideline that is to be considered during review of development applications.

Major Transit Station Area – Commercial Analysis, Watson & Associates Economists Ltd. (July 2024)

- We understand that the proposed OPA and final Draft Secondary Plan will be informed by the “Major Transit Station Area – Commercial Analysis” completed by Watson & Associates Economists Ltd. (Attachment 3 to the Information Report). Based on our review for this report, it has been concluded by the City’s consultant that the City’s current allocation of retail and commercial within the Rutherford MTSA is deemed to be excessive.

We ask that City Staff confirm what amendments have been, or are planned to be, made to the Draft Secondary Plan policies to address Watson & Associates’ conclusion in this regard.



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. More specifically, these Sections reference the wrong Schedules of the OPA.
 - **Requested Modification: Revise Section 2.2 a) to correctly reference Schedule E to the OPA, and Section 2.4 a) to correctly reference Schedule C of the OPA.**
- **Absence of Land Use Plan** – Section 2.6 of the OPA proposes the deletion of the current Queen Street Corridor Secondary Plan in its entirety, and its replacement with the new Draft Queen Street Transit Corridor Secondary Plan. However, the Draft OPA and Secondary Plan fail to include a Land Use Plan for the Secondary Plan. In the absence of a Land Use Plan, conformity between the Brampton Plan, Draft Secondary Plan and Precinct Plan Guidelines cannot be determined.
 - **Requested Modification: Add a 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”.**
 - **Requested Modification: That the Queen East Precinct Plan Guidelines not be included as an Appendix to the Secondary Plan.**

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 2.0 – Vision and Guiding Principles

- Policy 2.0 a) refers to a portion of the Downtown Brampton Urban Centre and the entirety of the Bramalea Urban Centre as being located within the Queen Street Transit Corridor Secondary Plan. However, this Policy fails to recognize that a portion of the City of Brampton Urban Growth Centre is also located within the Secondary Plan area. The Brampton Urban Growth Centre is identified by the Province as being a Provincially significant Strategic Growth Area that shall accommodate the tallest buildings and highest densities in the City.
 - **Requested Modification: Revise Policy 2.0 a) by including the words “including the Brampton Urban Growth Centre” after the words “Urban Centres” in the 3rd and 4th sentence of the Policy.**

Section 3.0 – Population and Jobs

- Table 1 of the Draft Secondary Plan identifies the minimum combined population and jobs target of 160 people and jobs combined per hectare for the Secondary Plan’s seven (7) MTSA’s. However, Table 1 fails to recognize that the City of Brampton’s Urban Growth Centre, as a whole, is required by the Growth Plan to achieve the minimum density target of 200 people and jobs per hectare prior to the year 2031.
 - **Requested Modification: Revise Table 1 by including a new column identifying the additional combined population and jobs required by 2031 to meet the minimum density target for the City of Brampton’s Urban Growth Centre.**

Section 4.0 – Land Use

- Policy 4.0 a) states that “The use of land within the Secondary Plan area shall be in accordance with the Brampton Plan MTSA Land Use Schedules 13d-13j.” Further, the Draft Secondary Plan repeatedly states that the Secondary Plan is intended to be in accordance with the MTSA Land Use Schedules of the Brampton Plan (see Section 1.0 and the Explanatory Note of the OPA, and Section 1.0, Policy 12.0 a), and Policy 12.1 a) of the Secondary Plan). We note that Schedule 10(a), being the Draft Queen East Precinct Plan, is inconsistent with the Rutherford MTSA Land Use Plan (Schedule 13f of the Brampton Plan). More specifically, while no Land Use Plan has been included in the Secondary Plan (see above), the southern limits of the subject site have been identified as being located within the ‘Eastern Employment District’ Character Area, which is intended to function as an Employment Area that prohibits residential and other sensitive land uses. This is inconsistent with Rutherford MTSA Land Use Schedule 13f of the Brampton Plan,



which designates the subject site ‘Mixed-Use (High-Rise Mixed-Use)’ and ‘Mixed-Use (Mid-Rise Mixed-Use)’.

- **Requested Modification: Revise the Precinct Plan and Precinct Plan Guidelines to include the entire subject site within the Queen Transit Corridor Character Area.**
- **Requested Modification: Include a Secondary Plan Land Use Plan Schedule to the OPA and Draft Queen Street Transit Corridor Secondary Plan and designate the subject site as ‘Mixed-Use (High-Rise Mixed-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 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 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, which are inconsistent with Soneil’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 designed ‘Neighbourhood (High-Rise Residential)’ or ‘Mixed-Use (High-Rise Mixed-Use)’. This Policy could be interpreted to mean 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 Soneil 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 the Precinct Plan Schedule 10(a). Flexibility should be included in 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 20.0 metres in width and that the cross-section for these public right-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, and landscaped boulevards. This requirement for private



streets is excessive and goes well beyond the functional requirements of a private street/laneway, which typically ranges 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. Relatedly, it is unclear as to 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 11.0 – Implementation and Monitoring

- Policy 11.0 c) i) is vague and unclear. Please confirm the intent of the Policy relative to the review of development applications.

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’ does not include a legend to explain the various overlays provided on the Schedule. In order to be able to provide comments on the Precinct Plan, a legend must first be included.

Notwithstanding the above, we have made the following assumptions:

- The majority of the subject site is located within the ‘Queen Transit Corridor’ Character Area, except the southern limit, which is located within the ‘Eastern Avenue Employment’ Character Area;
- ‘Retail Frontage’ is identified as being required along the full extent of the subject site’s frontage of Queen Street East and a small portion of Rutherford Road South;
- Two (2) ‘Mid-Block Connections’ are identified, which generally divide the subject site into quadrants; and
- Two (2) public streets are identified, being a north-south street located along the subject site’s west lot line intersecting with Queen Street East, along with a small portion of the proposed collector east-west street that is planned to be located south of Queen Street East within the Precinct Plan area (which is also identified as a ‘Linear Connector’).

Soneil has serious concerns with the Queen East Precinct Plan, as it relates to the subject site, as follows:

- Disregard for Soneil’s Master Plan and Pre-Application Consultation Submission – The Precinct Plan and related policies disregard, and are inconsistent with the



Soneil Master Plan, upon which a formal Official Plan and/or Zoning By-Law Amendment Application and Draft Plan of Subdivision Application are being prepared and soon to be filed with the City. The Draft Precinct Plan (Schedule and Policies) should be revised to reflect the specific land use and development policies pursuant to Soneil’s Master Plan.

- **Requested Modification: Delete the ‘Eastern Avenue Employment’ Character Area overlay within the south portion of the subject site within the Precinct Plan and replace with the ‘Queen Transit Corridor’ Character Area overlay, to be consistent with the remainder of the subject site.**
- **Requested Modification: Revise the ‘Mid-Block Connections’ within the Precinct Plan to be consistent with the Soneil Master Plan.**
- **Requested Modification: Revise the street network within the Precinct Plan to be consistent with the Soneil Master Plan, including the “straightening” of the alignment of the proposed east-west street within the subject site, generally consistent with the Brampton Plan Rutherford MTSA Land Use Plan, Arup Transportation/SWM Study, and existing Queen Street Corridor Secondary Plan Area 36.**
- **Requested Modification: Delete ‘Linear Connector’ within the subject site from the Precinct Plan.**
- 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, is 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 Plan*** – Figure 1.2 of the Guidelines is the Land Use Schedule for the Secondary Plan Area pursuant to the relevant MTSA Land Use Schedules of the Brampton Plan. As noted above, the scope of Soneil’s OLT Appeal of the Brampton Plan currently includes the MTSA Land Use Schedule 13f and the draft Land Use Schedule in Figure 1.2 of the Guidelines and therefore cannot be supported at this time.
 - **Requested Modification: Delete Figure 1.2**
- ***Precinct Plan*** – Section 3.2 of the Guidelines includes the Precinct Plan. Soneil’s concerns with the Precinct Plan are outlined above.
 - **Requested Modification: Delete the ‘Eastern Avenue Employment’ Character Area overlay within the south portion of the subject site and replace with the ‘Queen Transit Corridor’ Character Area overlay within Figures 3.2.1 and 3.5.3.**
 - **Requested Modification: Revise the ‘Mid-Block Connections’ within the Precinct Plan contained within Figure 3.2.1 to be consistent with the Soneil Master Plan.**
 - **Requested Modification: Revise the street network within the Precinct Plan contained within Figure 3.2.1 to be consistent with the Soneil Master Plan, including the “straightening” of the alignment of the proposed east-west street within the subject site.**
 - **Requested Modification: Delete the ‘Linear Connector’ within the subject site from the Precinct Plan contained within Figure 3.2.1.**
- ***Demonstration Plan*** – Figure 3.4.2 of the Guidelines is a “Demonstration Plan” and Figure 3.4.1 is a conceptual aerial view of the Demonstration Plan. While only intended to be illustrative, these Figures do not appropriately reflect the Soneil Master Plan proposal and are inconsistent with the Rutherford MTSA Land Use Schedule of the Brampton Plan, from a street network and open space perspective.



- **Requested Modification: Revise the Demonstration Plan and Aerial View (Figures 3.4.1 and 3.4.2) to be consistent with the Soneil Master Plan including:**
 - **Revise the ‘Potential Buildings’ to include the six (6) towers and one (1) mid-rise building proposed by Soneil;**
 - **Reduce the extent of the ‘Retail Frontage’ along Rutherford Road South;**
 - **Delete the linear ‘Urban Park’ from the subject site; and**
 - **Revise the street network including the “straightening” of the alignment of the proposed east-west street within the Soneil property.**
- ***Character Areas*** – Figure 3.5.3 of the Guidelines identifies the majority of the subject site as being within the ‘Queen Transit Corridor’ Character Area. However, it incorrectly identifies the southern limits of the subject site as being located within the ‘Eastern Employment District’ Character Area. The subject site is currently developed with retail commercial uses and is not designated ‘Employment’ in either the current 2006 Brampton Official Plan or Brampton Plan. The Rutherford MTSA Land Use Plan designates the entire property Mixed-Use.
 - **Requested Modification: Delete the ‘Eastern Avenue Employment’ Character Area overlay within the south portion of the subject site and replace with the ‘Queen Transit Corridor’ Character Area overlay within Figures 3.2.1 and 3.5.3.**
- ***Proposed Street Pattern*** – Figure 4.1.1 of the Guidelines identifies a conceptual Proposed Street Pattern, including two (2) ‘Proposed Public Streets 20.0 m’ (as noted above) and two (2) ‘Potential Private Streets’. The ‘Potential Private Streets’ appear to conflict with the ‘Mid-Block Connections’ identified in other Figures of the Guidelines and the Precinct Plan.
 - **Requested Modification: Revise the street network within the Precinct Plan to be consistent with the Soneil Master Plan, including the “straightening” of the alignment of the proposed east-west ‘Proposed Public Streets 20.0 m’ within the Soneil property.**
- ***Potential Redevelopment Configuration*** – Section 4.2 of the Guidelines states that the development scenarios within the Guidelines “demonstrate the maximum built-out utilizing the densities and heights prescribed by the Secondary Plan”. This is inconsistent with the Information Report and Secondary Plan, which specifically indicate that the Secondary Plan, Precinct Plan and Precinct Plan Guidelines are not intended to prescribe specific maximum heights and densities.
 - **Requested Modification: Delete the following sentence from Section 4.2: “The scenarios demonstrate the maximum built-out utilizing the densities and heights prescribed by the Secondary Plan”.**



- **Proposed Height Distribution** – Guideline 4.4 d) states that “Potential minimum and maximum building heights and density ranges are shown on Fig. 4.4.2”. Similar to the above, this is inconsistent with the Information Report and Secondary Plan. Soneil has significant concerns with Figure 4.4.2 of the Guidelines as it establishes a prescriptive height distribution model that is not appropriate within a Guideline. Further, Soneil is concerned with the fact that the Height Distribution Figure does not identify all six (6) high-rise towers within the Soneil Master Plan, with only four (4) high-rise towers being identified in the Figure.
 - **Requested Modification: Revise Figure 4.4.2 to be consistent with the number of towers (6) and their corresponding heights as identified in the Soneil Master Plan.**
- **Proposed Height Distribution** – Figure 4.5.1 of the Guidelines identifies the northerly half of the subject site as being developed with unlimited limited density, with the southern half of the subject site identified with a density of ‘5 FSI’.
 - **Requested Modification: Revise Figure 4.5.1 by replacing that portion of the subject site identified as ‘5 FSI’ overlay with a ‘6 FSI’ overlay.**
- **Open Space Framework** – Section 5.1 of the Guidelines identifies a conceptual Open Space Framework within Figure 5.1.2. Figure 5.1.2 is inconsistent with the Soneil Master Plan or MTSA Land Use Plan.
 - **Requested Modification: Revise Figure 5.1.2 to delete the linear ‘Urban Park’ and ‘Green Connection’ from the subject site as shown.**
- **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

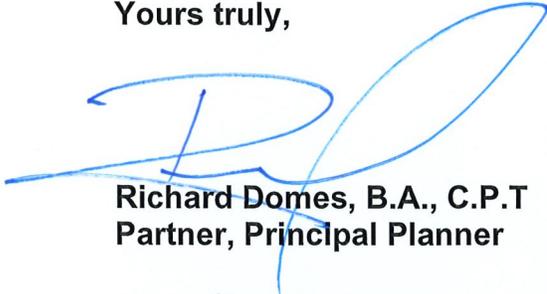
As summarized above, Soneil has concerns with the proposed OPA and associated Queen Street Transit Corridor Secondary Plan, Queen East Precinct Plan, and Queen East Precinct Plan Guidelines. We request that City Staff meet with Soneil and its core consulting team to discuss the concerns as outlined herein 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.

We also respectfully request to be notified in writing of all future 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,

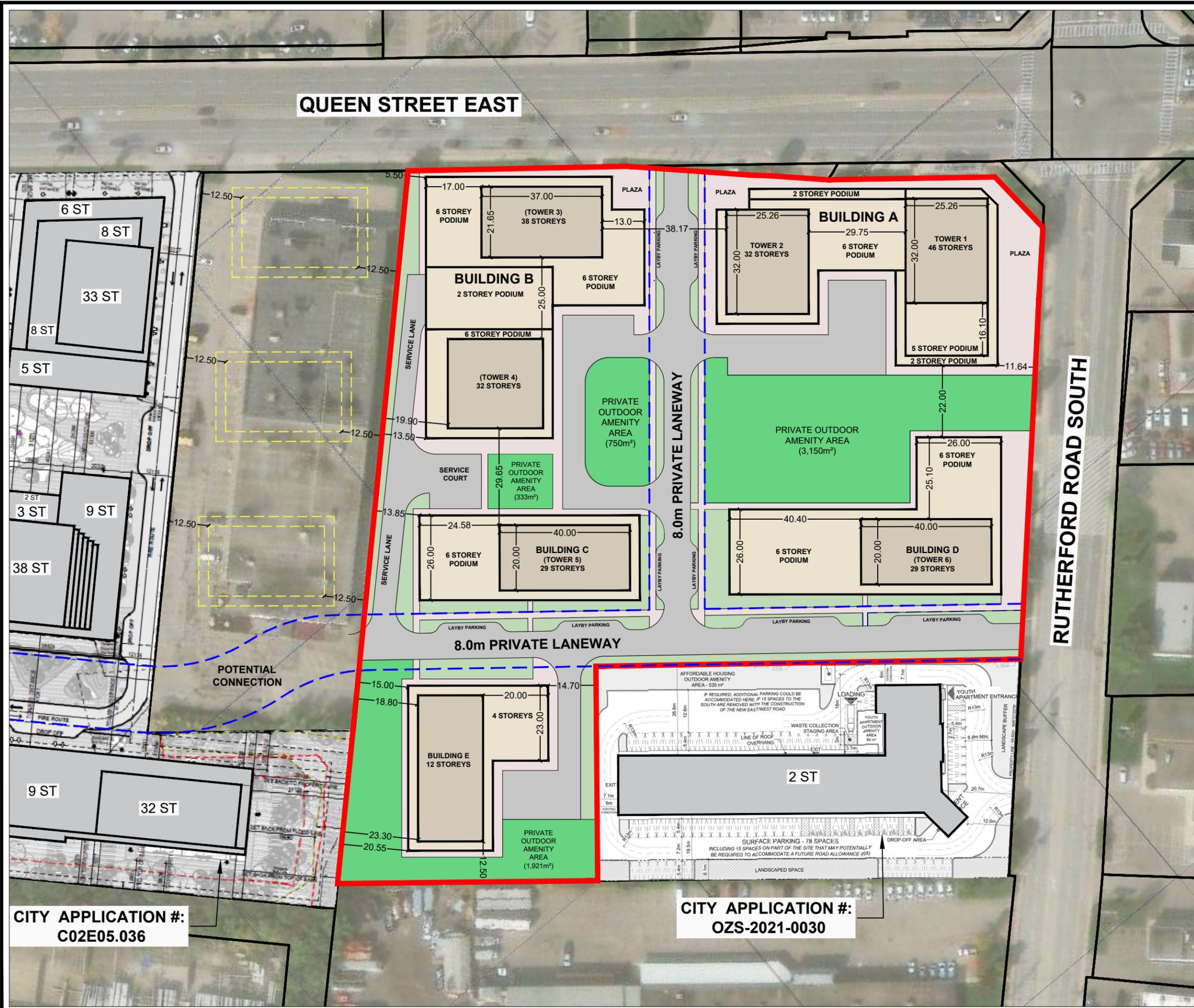


Richard Domes, B.A., C.P.T
Partner, Principal Planner



Nikhail Dawan, B.E.S.
Planning Associate

cc: Soneil Markham Inc.
M. Gagnon, Gagnon Walker Domes Ltd.
I. Tang/L. English, Borden Ladner Gervais LLP
S. Ganesh, City of Brampton
M. Kallideen, City of Brampton
H. Zbogar, City of Brampton
M. Gervais, City of Brampton



TOTAL SITE AREA:	3.49ha (8.62 ac)
BUILDING A - 32 & 46 STOREY MIXED USE BUILDING	
TOTAL GROSS FLOOR AREA:	70,925m ² (763,430ft ²)
• TOTAL NON-RESIDENTIAL GROSS FLOOR AREA:	2,450m ² (26,371ft ²)
• TOTAL RESIDENTIAL GROSS FLOOR AREA:	68,475m ² (737,058ft ²)
TOTAL RESIDENTIAL UNITS:	898 units
(To calculate approximate unit count, subtract 20% from the Residential Gross Floor Area above and divide by an approximate unit area of 61m ² net (650ft ²).	
BUILDING B - 32 & 38 STOREY RESIDENTIAL BUILDING	
TOTAL GROSS FLOOR AREA:	68,355m ² (735,767ft ²)
• TOTAL RESIDENTIAL GROSS FLOOR AREA:	68,355m ² (735,767ft ²)
TOTAL RESIDENTIAL UNITS:	896 units
BUILDING C - 29 STOREY RESIDENTIAL BUILDING	
TOTAL GROSS FLOOR AREA:	29,586m ² (318,461ft ²)
• TOTAL RESIDENTIAL GROSS FLOOR AREA:	29,586m ² (318,461ft ²)
TOTAL RESIDENTIAL UNITS:	388 units
BUILDING D - 29 STOREY RESIDENTIAL BUILDING	
TOTAL GROSS FLOOR AREA:	34,315m ² (369,363ft ²)
• TOTAL RESIDENTIAL GROSS FLOOR AREA:	34,315m ² (369,363ft ²)
TOTAL RESIDENTIAL UNITS:	450 units
BUILDING E - 12 STOREY RESIDENTIAL BUILDING	
TOTAL GROSS FLOOR AREA:	13,631m ² (146,722ft ²)
• TOTAL RESIDENTIAL GROSS FLOOR AREA:	13,631m ² (146,722ft ²)
TOTAL RESIDENTIAL UNITS:	178 units
OVERALL TOTAL GROSS FLOOR AREA:	
NON-RESIDENTIAL GROSS FLOOR AREA:	2,450m ² (26,371ft ²)
RESIDENTIAL GROSS FLOOR AREA:	214,362m ² (2,307,373ft ²)
TOTAL GROSS FLOOR AREA:	216,812m ² (2,333,744ft ²)
OVERALL TOTAL RESIDENTIAL UNIT COUNT:	2,810 units
F.S.I.:	6.21 (6.14 RES. / 0.07 NON-RES.)
AT GRADE OUTDOOR AMENITY AREA:	6,154m ² (66,241ft ²)

"PRELIMINARY"
FOR DISCUSSION
PURPOSES ONLY

LEGEND

- PROPERTY BOUNDARY
- PAVING
- PROPOSED APARTMENT BUILDING
- WALKWAYS
- LANDSCAPING
- AT GRADE OUTDOOR AMENITY

Note: Information shown on this plan is approximate, based on desktop analysis and is to be verified using an up-to-date Boundary and Topographic Survey Plan.

**DEVELOPMENT CONCEPT PLAN
MIXED USE DEVELOPMENT**

261 & 263 QUEEN STREET EAST
CITY OF BRAMPTON, REGION OF PEEL

P.N.: 21.2941.00	Date: October 18, 2022	CP 1.2
Scale: N.T.S.	Revised:	
Drawn By: D.S.	File No.: PN 2941_Concept Plan	

CITY APPLICATION #:
C02E05.036

CITY APPLICATION #:
OZS-2021-0030



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