

**Detailed Planning Analysis**  
**City File Number: OZS-2020-0012**

**Overview:**

The proposal has been reviewed and evaluated against the Planning Act, Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the Regional Official Plan, the City's Official Plan, the Bram East Secondary Plan and other applicable City of Brampton guidelines and priorities.

**The Planning Act:**

The Planning Act is the provincial legislation which sets the rules for land use planning in Ontario. Part 1, Section 2 of the Act includes matters of Provincial Interest, which the Council of a municipality must have regard to. This proposal has regard for the following specific matters of provincial interest:

Criteria to be Considered	Analysis
<i>(a) – the protection of ecological systems, including natural areas, features and functions;</i>	This proposal will designate natural areas under the appropriate designations for their protection.
<i>(h) – the orderly development of safe and healthy communities;</i>	This proposal represents orderly development as it will make efficient use of land and provide future residents with access to existing transit and pedestrian connections.
<i>(j) – the adequate provision of a full range of housing, including affordable housing;</i>	This proposal will permit development of 78 stacked townhouse dwelling which will add to the variety of housing types in the area.
<i>(p) – the appropriate location of growth and development;</i>	This proposal is within an appropriate location for growth and development as it will make efficient use of land and existing infrastructure.
<i>(q) – the promotion of development that is designed to be sustainable, to support</i>	This proposal will provide future residents with access to existing transit routes and

<i>public transit and to be oriented to pedestrians;</i>	it is designed to facilitate pedestrian movement both within the site and the broader area.
<i>(r) – the promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;</i>	This proposal will contain well designed built form that encourages a sense of place.

Part 6, Section 51(24) of the Act identifies criteria that the Council of a municipality will have regard to when considering a draft plan of subdivision. This proposal has regard for the following criteria:

<b>Criteria to be Considered</b>	<b>Analysis</b>
<i>(a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;</i>	This proposal is consistent with matters of provincial interest. It represents orderly development in an appropriate location that increases the variety of housing types while supporting transit and sustainability.
(b) whether the proposed subdivision is premature or in the public interest;	This proposal is appropriate as services currently exist in the area and it is in the public interest to expand the range of housing types and support both transit and sustainability.
(c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The site is designated “Residential” and this proposal conforms with the Official Plan objectives and policies for this designation and the adjacent land uses.
(d) the suitability of the land for the purposes for which it is to be subdivided;	This proposal is suitable for the lands as existing infrastructure is available to service the development and future residents will be able to access surrounding amenities.
(e) the number, width, location and proposed grades and elevations of	This proposal will contain a private road with a connection to a municipal street. A

highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	second access will be provided emergency access. This configuration was reviewed by Traffic Services and found acceptable.
(f) the dimensions and shapes of the proposed lots;	This proposal will create lots with appropriate dimensions and shapes for the proposed development.
(h) conservation of natural resources and flood control;	This proposal will conserve natural resources by applying appropriate land use designations to natural areas within the site.
(i) the adequacy of utilities and municipal services;	This proposal will have adequate water, storm water, sanitary sewer, and utility connections.
(m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act.	This proposal will be required to undergo a Site Plan Approval. This process will ensure well designed built form that encourages a sense of place.

### **Provincial Policy Statement:**

The Provincial Policy statement sets out fundamental planning principles and provides policy direction on matters of provincial interest related to land use planning and development. This application is consistent with matters of Provincial interest as identified in the Provincial Policy Statement.

#### *1.1.1 Healthy, liveable and safe communities are sustained by:*

*a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*

This proposal will promote efficient development and land use patterns by providing housing at a location with existing services thereby making efficient use of land and promoting sustainability.

*b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit*

*housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*

This proposal will provide stacked townhouse dwellings thereby increasing the variety of housing types available at this location. A greater variety of housing options will ensure that the long-term needs are met

*e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;*

This proposal promotes the integration of land use planning, growth management, and intensification to achieve cost-effective development patterns. Planning for stacked townhouses will minimize land consumption and servicing cost by making efficient use of the land while supporting transit by providing potential future users along existing routes.

*1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

- a) efficiently use land and resources;*
  - b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*
  - c) minimize negative impacts to air quality and climate change, and promote energy efficiency;*
  - d) prepare for the impacts of a changing climate;*
  - e) support active transportation;*
  - f) are transit-supportive, where transit is planned, exists or may be developed;*
- Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.*

This proposal provides medium/high density residential dwellings in an area with existing infrastructure and services. This meets these requirements by promoting the efficient use of land, infrastructure, and service facilities. It is both supportive of transit and active transportation.

*1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:*

- b) permitting and facilitating:*
  - 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;*

- c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;*
- d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;*
- e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations;*

This proposal meets these requirements by introducing a medium/high density residential dwelling types into an area with appropriate levels of infrastructure and services are available. This will be an efficient use of land and resources. It will support transit by providing increased potential for riders along a secondary transit corridor. It will promote active transportation by providing connections to existing routes.

*1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which:*

- a) promote compact form and a structure of nodes and corridors;*

This proposal supports these requirements by providing housing in a compact form that makes efficient use of land.

## **2020 Growth Plan for the Greater Golden Horseshoe:**

The Growth Plan for the Greater Golden Horseshoe (Growth Plan) provides a framework for building stronger, more prosperous communities by managing growth over the long term. Guiding principles include supporting complete communities, providing a mix of housing types, and prioritizing intensification. The proposed development demonstrates conformity generally to this plan, including:

*2.2.1.2 Forecasted growth to the horizon of this Plan will be allocated based on the following:*

- a) the vast majority of growth will be directed to settlement areas that:*
  - i. have a delineated built boundary;*
  - ii. have existing or planned municipal water and wastewater systems; and*
  - iii. can support the achievement of complete communities;*
- c) within settlement areas, growth will be focused in:*
  - i. delineated built-up areas;*
  - ii. strategic growth areas;*
  - iii. locations with existing or planned transit, with a priority on higher order transit where it exists or is planned; and*
  - iv. areas with existing or planned public service facilities;*

This proposal will direct growth toward an appropriate area. It is located within a settlement area's built boundary with existing infrastructure and services. It will contribute to the creation of complete communities and support existing transit and public service facilities.

*2.2.1.4 Applying the policies of this Plan will support the achievement of complete communities that:*

*a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;*

*b) improve social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes;*

*c) provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*

*d) expand convenient access to:*

*i. a range of transportation options, including options for the safe, comfortable and convenient use of active transportation;*

*ii. public service facilities, co-located and integrated in community hubs;*

*iii. an appropriate supply of safe, publicly-accessible open spaces, parks, trails, and other recreational facilities; and*

*iv. healthy, local, and affordable food options, including through urban agriculture;*

*e) provide for a more compact built form and a vibrant public realm, including public open spaces;*

*f) mitigate and adapt to climate change impacts, improve resilience and reduce greenhouse gas emissions, and contribute to environmental sustainability;*

This proposal supports the creation of complete communities. It will provide convenient access to store, services and public service facilities. It will contribute to a broader range of housing types allowing future residents to access existing services and facilities. It will expand access to transit, open spaces, and trails. It will provide a compact built form with outdoor amenity space for future residents. It will contribute to environmental sustainability.

### **Region of Peel Official Plan:**

The Region of Peel Official Plan provides a policy framework to help manage Peel's growth and development over the long term. The subject property is located within the

“Urban System” in the Region of Peel’s Official Plan. This application conforms to several “Urban System” designation objectives, including:

*5.3.1.3 To establish healthy complete urban communities that contain living, working and recreational opportunities, which respect the natural environment, resources and the characteristics of existing communities.*

This proposal will establish healthy complete communities. It provides a living opportunity that respects the adjacent natural heritage feature while making efficient use of land and existing services and infrastructure.

*5.3.1.4 To achieve intensified and compact form and a mix of land uses in appropriate areas that efficiently use land, services, infrastructure and public finances while taking into account the characteristics of existing communities and services.*

This proposal will achieve a compact form through the development of stacked townhouse dwellings. The location for this proposal is appropriate in that it will efficiently use land, services, and infrastructure. The development will require a site plan approval which will ensure that the characteristics of the existing community is taken into account.

*5.3.1.5 To achieve an urban structure, form and densities which are pedestrian friendly and transit-supportive.*

This proposal will provide residential dwellings in a form and density which is pedestrian and transit-supportive. As the site is located along a secondary transit corridor it is positioned to support existing transit routes. Pedestrian connections will be provided to support active transportation.

*5.5.1.1 To optimize the use of the existing land supply of the Region by directing a significant portion of growth to the built-up areas through intensification, particularly the urban growth centres, intensification corridors and major transit service areas.*

This proposal will provide compact residential dwellings in the form of stacked townhouses which will optimize the use of land, through intensification, by directing growth to the designated built boundary and along a secondary transit corridor.

*5.5.1.6 To support planning for complete communities in Peel that are compact, well-designed, transit-oriented, offer transportation choices, include a diverse mix of land uses, accommodate people at all stages of life and have an appropriate mix of housing, a good range of jobs, high quality open space, and easy access to retail and services to meet daily needs.*

This proposal will support the development of complete communities by providing stacked townhouses which are compact and add to the diversity of housing mix. It will

be well designed and provide high quality open space in the form of outdoor amenity areas. And it will support access to retail and services.

*5.5.3.1.1 To achieve compact and efficient urban forms.*

*5.5.3.1.2 To optimize the use of existing infrastructure and services.*

*5.5.3.1.3 To revitalize and/or enhance developed areas.*

*5.5.3.1.4 To intensify development on underutilized lands.*

This proposal achieves these intensifications objectives. It will provide a compact and efficient urban form in the type of stacked townhouses, which will intensify the use of land. This will introduce more residents into the area optimizing the use of existing infrastructure and services. The development will enhance the area through high quality design and designation of natural heritage features.

### **City of Brampton Official Plan:**

The City of Brampton's Official Plan provides comprehensive policies that facilitate land use decision making. The purpose of the plan is to guide development and infrastructure decisions and set the basis for addressing the challenges of growth in Brampton. The Plan incorporates upper level planning policies of the PPS, Growth Plan and Regional Official Plan.

The subject property is designated "Residential" in the Brampton Official Plan. The northern portion of this site, which is within a natural heritage feature, will be designated "Open Space". The proposed amendment generally conforms to the intent of this plan. This includes:

3.2.8.5 Where the City has deemed that the City Structure would not be compromised, as required by Section 3.2.4, development outside of the Central Area, including the Urban Growth Centres; Mobility Hubs; Major Transit Station Areas or intensification corridors which is seeking to exceed the limits established in Section 3.2.8.3 and 3.2.8.4 may only be considered subject to the submission of an amendment to this Plan. This amendment is required to demonstrate the following:

- (i) The development is consistent with the general intent and vision of the applicable Secondary Plan;
- (ii) The development contributes to the City's desired housing mix;
- (iii) There is a need for the development to meet the population and employment forecasts set out in Section 2 of this Plan;
- (iv) The development forms part of an existing or planned Complete Community with convenient access to uses which serve the day to-day needs of residents such as commercial, recreational and institutional uses;
- (v) There is sufficient existing or planned infrastructure to accommodate the development;
- (vi) The development has vehicular access to an Arterial, Minor Arterial, or Collector Road;



- (vii) The development is in close proximity to existing or planned higher order transit and maintains or improves pedestrian, bicycle and vehicular access;
- (viii) The form of development is compatible and integrates with adjacent land use and planned land use, including lot size, configuration, frontages, height, massing, architecture, streetscapes, heritage features, setbacks, privacy, shadowing, the pedestrian environment and parking;
- (ix) The development meets the required limits of development as established by the City and Conservation Authority and that appropriate buffers and sustainable management measures are applied, if necessary, in order to ensure the identification, protections, restoration and enhancement of the natural heritage system;
- (x) The development site affords opportunities for enjoyment of natural open space by the site's adjacency to significant environmental or topographic features (e.g. river valleys, rehabilitated gravel pits, woodlots) subject to the policies of the Natural Heritage and Environmental Management section of this Plan and the City's Development Design Guidelines;
- (xi) The development maintains transition in built form through appropriate height, massing, character, architectural design, siting, setbacks, parking and open and amenity space;
- (xii) Where possible, the development incorporates sustainable technologies and concepts of low impact development, including measures to mitigate the impacts of the development. This should include the submission of a storm water management plan acceptable to the City and Conservation Authority, which identifies the required storm drainage system and potential impacts on downstream watercourses.

This proposal demonstrates that the City Structure will not be compromised by exceeding a density of 50 units per hectare as set out in Section 3.2.8.3. This proposal is consistent with the general intent of the Secondary Plan. The proposed use is residential and it add to the range of housing types available. The development is within a complete community with access to retail, open space, and services. The development has direct access to a collector road. The site is within close proximity of higher order transit and will maintain pedestrian, bicycle, and vehicular access. The form is compatible with existing adjacent uses including the height, massing, setbacks, and privacy. The proposal includes appropriate buffers and protection of natural heritage features and provides opportunity for enjoyment of this space. Transition is maintained through appropriate height, massing, architectural design, and setbacks. And appropriate sustainability measures have been considered. Furthermore, compatibility and transition will be considered further through the site plan approval process.

#### *4.2 It is the objective of the Residential Policies to:*

- a) Establish policies that provide opportunities for the development of a broad mix of housing in terms of dwelling types, densities, tenure and cost to meet the needs of Brampton's diverse community including persons with disabilities;*

- b) Encourage the development of built forms that enhance the characteristics of the neighbourhood, protect and enhance the natural heritage, promote public safety, encourage intensification and create attractive streetscapes;*
- c) Accommodate residential growth by promoting and facilitating intensification throughout the built-up area and ensuring compact, complete greenfield neighbourhoods;*
- e) Improve Brampton's residential assessment base by promoting a balanced mix of housing;*
- f) Reduce the cost of providing municipal services in residential areas by promoting efficient land use and layout design;*

This proposal will support the objectives of residential policies by enhancing the mix of residential dwelling types available through the development of a compact urban form that promotes efficient use of land. This development will encourage intensification while creating an attractive streetscape and protecting natural heritage.

*4.2.1.1 The Residential designations shown on Schedule "A" permit predominantly residential land uses including a full range of dwelling types ranging from single detached houses to high-rise apartments.*

This proposal maintains the intent of this designation. It proposes the development of a residential use in a form that contributes to the full range of housing types.

*4.6.6.5 For development applications, including redevelopment and intensification, with the Built Boundary, the City will seek opportunities to manage, restore, connect and where possible, enhance existing open space and natural areas, as feasible.*

*4.6.6.10 The City shall seek opportunities, where feasible, through development or redevelopment, to buffer adjacent natural areas and identify opportunities to provide or enhance connections.*

*4.6.7.4 Through the development approval process, valleylands and watercourse corridors, including associated environmental hazards and defined conservation buffers will be gratuitously conveyed to the City of Brampton. Municipal conveyance of these corridors and buffers will not be considered as contributing towards the parkland dedication requirements under the Planning Act.*

This proposal is located next to a natural heritage feature. A creek valley that runs along the northern edge of the site. This proposal will designate these lands and appropriate buffer area accordingly. And this proposal will allow future residents to enjoy the feature. Connections will be provided where possible.

### **Bram East Secondary Plan (Area 41):**

The site is designated “Low/Medium Density Residential”, “Medium Density Residential”, and “Valleyland” in the Bram East Secondary Plan which does not permit the proposed residential use. The proposal requires a Secondary Plan amendment to permit the proposed residential use and increase in density.

To facilitate the proposed development, it is proposed that a new “Medium/High Density Residential” designation be created for the plan area. This new designation would be applied to this site, except for a portion along the northern edge of the site which will be designated “Valleyland”.

This new “Medium/High Density Residential” designation would permit a maximum density of 65 units per net hectare (27 units per net acre). The designation will allow a range of housing types that fall within the High Density Residential category of the Official Plan. This new designation would be available for other intensification proposals within the plan area.

This proposal is consistent with the development principles for Residential development as outlined in Section 3.0 of the Bram East Secondary Plan.

*3.1.1 The various residential designations shown on Schedule SP41(a) are categories in which the predominant use of land is residential and collectively include the full range of dwelling types from detached units to high rise apartments. Complementary uses as set out in Part I of the Official Plan are also permitted in the various residential designations or may be specifically identified by other designations or policies in this Secondary Plan. Minor utility installations such as transformer sub-stations and telephone switching centres are also permitted in the residential designations provided that they are integrated in an appropriate manner with adjacent residential uses.*

This proposal for stacked townhouse dwellings will introduce a broader range of dwelling types to the plan area. The type of use is appropriate for this category and the form of housing is within the anticipated range for the plan area.

*3.3.2 Building setbacks may be imposed from the margin of Hazard Lands so as to have regard for the extent and severity of existing and potential hazards. Setbacks shall be determined by the Conservation Authority and the City prior to draft approval of affected plans of subdivision and incorporated into the implementing zoning by-law. These considerations have the potential to reduce the total amount of tableland area available for urban development.*

This proposal will designate the natural heritage feature appropriately and incorporate appropriate setbacks and buffer area into the draft plan of subdivision and zoning by-law.

## **Zoning By-law:**

The property is zoned “Highway Commercial One (HC1-1501)” “Agricultural (A)” by By-law 270-2004, as amended. An amendment to the Zoning By-law is required to facilitate the proposed development.

This proposal proposes a change from the existing zone to a Site Specific Residential Townhouse zone (R3A-3550). Provisions of this proposed zoning designation are listed below:

- (1) Minimum Lot Area: 11,000.00 square metres;
- (2) Minimum Lot Width: 75.0 metres;
- (3) Minimum Lot Depth: 140.0 metres;
- (4) Minimum Front Yard Depth: 6.0 metres to the front wall of a dwelling and 4.5 metres to a balcony, porch, or bay window;
- (5) Minimum Interior Side Yard Width: 15.0 metres;
- (6) Minimum separation between buildings: 12.0 metres, except that a minimum 5.0 metres shall be permitted between end walls of dwellings;
- (7) Maximum Lot Coverage for all buildings: 35% of the lot area;
- (8) Minimum Landscaped Open Space: 25% of the lot area;
- (9) Maximum Building Height: 3.5 storeys or 13.5 metres, whichever is greater; and
- (10) A balcony or porch may project into the interior side yard by a maximum of 1.8 metres including eaves and cornices.

This site specific zone will allow stacked townhouse development and set out requirements such as, but not limited to, yard width, separation space, lot coverage, landscape area. These requirements will permit development that is appropriate with the surrounding residential uses.

The natural heritage feature and buffer area will be zoned “Floodplain (F)” and “Open Space (OS)” respectively.

## **Land Use:**

This application proposes a residential development consisting of 78 stacked townhouses adequately reflects the Council approved Official Plan. One row of

townhouses will face onto Ebenezer Road. Behind this row two parallel rows of townhouses will be positioned perpendicular to the street. An outdoor amenity area will be located between these two rows. The site will have access from Ebenezer Road. A perimeter road will provide access to individual dwellings. Visitor parking will be located on this perimeter road. A second emergency access to Ebenezer Road will be provided.

An Environmental Impact Study was prepared which established the boundaries of the Natural Heritage System (NHS). The NHS and buffer blocks are consistent with the findings of this study. These NHS and buffer blocks will be protected and preserved through the conveyance of these blocks to the City.

The uses described above that are proposed on the property are acceptable from a land-use perspective.

### **Urban Design:**

An Urban Design Brief prepared by Williams & Stewart Associates Limited dated April 24, 2020 was submitted with this application. Comments were provided to the applicant to address issues such as, but not limited to, massing, block lengths, and façade treatments. Subsequent revisions were received on May 12, 2021 that addressed these comments.

### **Transportation/Traffic:**

A Traffic Impact Study prepared by Candevcon Limited dated March 24, 2020 was submitted with this application. It assesses the impacts of the proposed development with access from Ebenezer Road. The study was based on 78 stacked townhouses.

The study concludes that the “traffic impacts from the trips generated by the proposed Infill Residential Development are minimal” and “intersections will operate at acceptable levels of service.”<sup>1</sup> The study recommends an emergency access with bollards for use of fire emergency vehicles.<sup>2</sup>

### **Noise:**

A Noise Control Feasibility Study prepared by SS Wilson Associates dated March 17, 2020 was submitted with this application. It defines the minimum noise attenuation requirements for the control of outdoor and indoor environmental sound levels. The study found that indoor noise controls are required for some dwellings along with warning clauses.<sup>3</sup>

City staff have reviewed the Noise Control Feasibility Study and concluded that it satisfactorily addresses the potential noise related issues for the proposed development.

### **Servicing:**

A Functional Servicing Report prepared by Candevcon Limited dated May 6, 2020 and revised December 3, 2020 was submitted with this application. This report demonstrates how the proposed development can be serviced.

#### Stormwater Management:

The report found that “the north end of the site (.12 ha) drains to the north directly into The Gore Road Tributary” and “the remaining portion of the site (1.15ha) drains to the south towards Ebenezer Road.”<sup>4</sup> The report recommends that “on-site storm water management systems are not warranted” because “the downstream sewer system and SWM [stormwater management] pond were designed to accommodate” this site.<sup>5</sup>

#### Sanitary Servicing:

The report recommends that “the site will be serviced via a 200mm sanitary sewer system which will connect to an existing MH [manhole] within the boulevard of Ebenezer Road.”<sup>6</sup>

#### Water Supply:

The report recommends that “the site will be serviced via a 150mm watermain that will be looped through the development and connected to the existing 150mm watermain located within the Ebenezer Road ROW.”<sup>7</sup>

### **Sustainability:**

A sustainability performance metrics and sustainability summary were submitted to measure the degree of sustainability of the proposal. The evaluation concluded that the proposal achieves a score of 32 points which meets bronze thresholds of sustainability defined by the City.

## Notes

1. Candevcon Limited, Traffic Impact Study: Your Home Development Corporation Proposed Infill Residential Development 4316 Ebenezer Road City of Brampton (Brampton, 2020), 27-28.

2. Candevcon Limited, Traffic Impact Study, 27.

3. Noise Control Feasibility Study: Proposed Townhouse Development 4316 Ebenezer Road City of Brampton (Richmond Hill, 2020), 4.

4. Candevcon Limited, Functional Servicing Report: Your Home Developments (Ebenezer) Inc Proposed Residential Condominium 4316 Ebenezer Road (Brampton, 2020), 8.

5. Candevcon Limited, Functional Servicing Report, 8.

6. Candevcon Limited, Functional Servicing Report, 7.

7. Candevcon Limited, Functional Servicing Report, 6.