

**TC Energy**

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April 5, 2022

Deputy Mayor Medeiros and  
Members of Council  
City of Brampton  
2 Wellington Street West  
Brampton, ON L6Y 4R2  
via email: [City.ClerksOffice@brampton.ca](mailto:City.ClerksOffice@brampton.ca)

Cc:

Anand Balram RPP  
Senior Policy Planner, City of Brampton  
2 Wellington Street W.  
Brampton, Ontario, L6Y 4R2

Dana Anderson RPP  
Partner, MHBC Planning, Urban Design & Landscape Architecture  
442 Brant Street, Suite 204  
Burlington, Ontario, L7R 2G4

**Re: April 6, 2022 Council Agenda, Items 18.10, 18.11, and 18.12  
City-Initiated Amendments to the Official Plan, Secondary Plan Area 52, Heritage Heights, Brampton ON**

Dear Deputy Mayor Medeiros;

TC Energy operates two high-pressure, large diameter natural gas pipelines in an easement through the Heritage Heights Secondary Plan Area 52, known as the TransCanada Pipeline Limited system (TCPL). TCPL is regulated by the Canada Energy Regulator through the *Canadian Energy Regulator Act*. Under Section 335 of the *Act*, TC Energy's authorization through our written consent will be required to construct a facility (including roads and structures) across, on, along or under a pipeline, or to engage in an activity that causes a ground disturbance within the 30 metre Prescribed Area on either side of the pipeline.

TC Energy has met with City of Brampton staff on several occasions and provided written input regarding the proposed transportation network around our pipeline system. Following a high-level review of the proposed road alignments for the Secondary Plan area as provided by the City of Brampton, TC Energy continues to be concerned that we do not see our recommendations incorporated in the proposed Secondary Plan. The outstanding recommendations we wish Council to be aware of include the following:

- We recommend that the road network in the area of Mount Pleasant be shown on this Secondary Plan as conforming with the Ministerial Zoning Order that was issued.
- TC Energy will only consent to paralleling roads on one side of TCPL's right-of-way and a paralleling road and associated infrastructure must be located a minimum of 7 m from the edge of the right-of-way. This is a concern for TC Energy in the area between Ad Road and Doubles Drive;

- The intersection of Ad Road with two roads parallel to the TCPL right-of-way will not conform with our recommendation to avoid road crossings in proximity to bends in our pipelines. We anticipate that two intersections as shown, potentially signalised, will constrain our access to the pipelines. TC Energy prefers a road network that eliminates these crossings; and,
- The intersection of Volley Way and Williams Parkway with two roads parallel to the TCPL right-of-way will not conform with our recommendation to avoid road crossings in proximity to bends in our pipelines. We anticipate that two intersections as shown, potentially signalised, will constrain our access to the pipelines. TC Energy prefers a road network that eliminates these crossings.

The current pipeline design provides for safe operation of the pipeline system under the current agricultural land uses within the Secondary Plan area. Council should be aware that the pipelines were not designed to accommodate the proposed road crossings shown on the Secondary Plan as presented. Some of the proposed crossings and parallel roads may not be approvable by TC Energy as required by Section 335 of the *Canadian Energy Regulator Act*, or may require pipeline modifications, in order to conform with Canadian Standards Association standard CSA-Z662 for pipeline systems. Any pipeline modifications for the proposed road crossings will be 100% at the expense of the proponent and may range roughly in cost from \$2-million to \$6-million per crossing. TC Energy strongly encourages a road network design for the Heritage Heights Secondary Plan that optimizes road crossings of the pipeline right-of-way and paralleling roads to the greatest extent possible, and we urge Council to consider the impact of the costs of the proposed road network on housing affordability within the City.

We look forward to further consultation on the Heritage Heights Secondary Plan and would appreciate an opportunity to incorporate our recommendations into your planning and design process.

Sincerely,

Geoffrey R. Kneller CD P.Eng MBA  
Senior Engineer, Right-of-Way Management  
Canada Gas Engineering