



November 16, 2022

Via e-mail: [cityclerksoffice@brampton.ca](mailto:cityclerksoffice@brampton.ca)

City of Brampton  
2 Wellington Street West  
Brampton, ON L6Y 4R2

[mkeating@cassels.com](mailto:mkeating@cassels.com)  
tel: +1 416 860 2978  
fax: +1 416 640 3010  
file # 15465-11

Attention: Jackie Sinopoli  
City Clerk

Dear Ms. Sinopoli:

**Re: City of Brampton - November 16, 2022 Special Council Meeting  
Item 6.3 - Draft Parkland Dedication By-law**

We are counsel to Daniels HR Corporation ("Daniels"), the owner of the lands known as Block 1 in Mount Pleasant Village located between Lagerfeld Drive to the north, Bovaird Drive to the south, Creditview Road to the east and Mississauga Road to the west, in the City of Brampton (the "Site").

Our client has reviewed the City's draft parkland dedication by-law (the "Draft By-law") being considered by Council on November 16, 2022 and is concerned with the impact of the Draft By-law on its existing planning approvals. In particular, the Site is subject to Zoning By-law Amendment and Draft Plan of Subdivision applications that were approved by City Council on October 20, 2021.

By way of background, Daniels is currently in the process of finalizing parkland dedication requirements under the existing 2013 Parkland Dedication By-law (the "2013 By-law"). The 2013 By-law includes high-density cash-in-lieu cap rates found at Section 7(c)(ii) that are applicable to the Site. We note that these provisions were not carried forward into the Draft By-law, which is not in keeping with the City's intent of encouraging high-density development.

Accordingly, the Draft By-law, in purpose and effect, is inconsistent with policies of the Provincial Policy Statement (2020), as required by Section 3(5)(a) of the *Planning Act*, including, but not limited to, policies 1.1.3.3 and 1.1.3.4, which promote *intensification*. The Draft By-law, in purpose and effect, also fails to conform to the policies of A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020), as required by the foregoing provisions of the *Planning Act*, including, but not limited to, policy 2.2.1.4, which supports the achievement of *complete communities* that (c) provide a diverse range and mix of housing options, and (e) provide for a more *compact built form*.

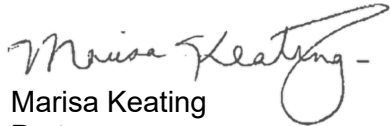
On this basis, we request that the high-density cash-in-lieu cap rates found at Section 7(c)(ii) of the 2013 By-law be re-instated.

As the Draft By-law was released for comment on short notice, we may provide further comments in advance of the December 14, 2022 Council Meeting.

Please provide notice to the undersigned of all municipal decisions with respect to this matter.

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in dark ink, appearing to read "Marisa Keating", with a stylized flourish at the end.

Marisa Keating  
Partner

MK/OA

LEGAL\*57493429.3