



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

**August 28, 2023**

GWD File: PN.22.3131.00

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

**Attention: Mayor and Members of Council  
Peter Fay, City Clerk  
Steve Ganesh, Commissioner, Planning, Building and Growth  
Management  
Michelle Gervais, Policy Planner, City Planning and Design  
Claudia LaRota, Supervisor/Principal Planner, City Planning and  
Design**

**Subject: Public Input – August 28, 2023 Planning & Development Committee  
Item 5.1 – Major Transit Station Areas, Draft Brampton Plan Policies,  
City-wide  
21 Queen Street East – Amexon Holdings Ltd.**

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Amexon Holdings Ltd. ("Amexon"); the registered owner of the property municipally known as 21 Queen Street East in the City of Brampton ("subject site"). The subject site is located on the south side of Queen Street East, between Main Street South and Chapel Street. The subject site is currently developed with a 9-storey office building and is located within the Regionally approved Brampton GO 'Primary' Major Transit Station Area ("MTSA").

Amexon has been actively engaged in the City of Brampton's MTSA Planning Study process. This has included, but is not limited to Amexon's participation in the Brampton GO MTSA Focus Group Session that was hosted by City Staff on May 11, 2023, and through formal written correspondence prepared by GWD on behalf of Amexon to City Planning Staff dated July 17, 2023. GWD's written correspondence outlined Amexon's concerns regarding the Draft Brampton GO MTSA Land Use Plan that was advanced through the City of Brampton Recommendation Report titled "Primary Major Transit Station Areas – Preliminary Land Use Plans, City-wide".

Amexon is currently planning for the future use of the subject site for residential uses through either adaptive reuse of the existing building or through high-rise redevelopment.

---

**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

**CONFIDENTIALITY  
CAUTION**

This document is Consultant-Client privileged and contains confidential information intended only for person(s) named above. Any distribution, copying or disclosure is strictly prohibited. If you have received this document in error, please notify us immediately by telephone and return the original to us by mail without making a copy.



## **Draft Brampton GO MTSA Land Use and Draft Brampton Plan Policies**

On behalf of Amexon, we have reviewed the City of Brampton Information Report dated July 31, 2023, along with the accompanying Draft Brampton GO MTSA Land Use Plan and Draft Brampton Plan policies. Based on our detailed review of the Draft Brampton GO MTSA Land Use Plan and Draft Brampton Plan policies, we offer the following comments, observations and recommendations:

### ***1. Proposed Land Use Designation***

Amexon previously outlined its concern with the Draft Brampton GO MTSA Land Use Plan's designation of the subject site as 'Low Rise Mixed Use'. Amexon's concern at that time was focused on how the 'Low Rise Mixed Use' designation was not appropriate for the subject site, as it did not consider the subject site's location within the City's Urban Growth Centre, proximity to existing and future higher order transit, contextual considerations, and the fact that the subject site is already developed with a 9-storey building.

Pursuant to the July 31, 2023 Information Report, we acknowledge City Planning Staff's revision to the Brampton GO MTSA Draft Land Use Plan, which now designates the subject site as 'Downtown Mixed-Use'. Although the subject site's land use designation has been revised, Amexon still prefers a 'High-Rise Mixed-Use' designation to allow for the potential adaptive reuse of the subject site for residential or mixed uses within a High-rise building.

According to Draft Brampton Plan policy, lands designated Downtown Mixed-Use permit primarily institutional uses that are supported by residential, office, retail and commercial uses. Based on the current context of Downtown Brampton, a large portion of lands are used primarily for residential and commercial purposes.

It is Amexon's position that if a High-Rise Mixed-Use designation is not applied to the subject site, then the Downtown Mixed-Use designation should not contemplate institutional uses as the primary use. Instead, all types of mixed uses, including residential should be allowed to be a primary use in the Downtown Mixed-Use designation.

Pursuant to Draft Brampton Plan policy, for lands designated Downtown Mixed-Use, the retention of existing dwellings and building facades are encouraged. As the subject site, and several other properties are not identified as heritage properties, we don't understand the relevance of this policy. Amexon recommends removal of this policy.

### ***2. Removal of Listed Heritage Overlay from Subject Site***

Amexon previously outlined its concern with the Draft Brampton GO MTSA Land Use Plan's identification of the subject site with a 'Listed Heritage Overlay'. Amexon's concern was that the subject site is not a 'Listed Property' on the City of



Brampton Municipal Register of Cultural Heritage Resources, therefore it should not be identified with a Listed Heritage Overlay.

We support City Planning Staff's revision to the Draft Brampton GO MTSA Land Use Plan, which now removes the Listed Heritage Overlay from the subject site.

### **Closing Remarks**

It is GWD's understanding that the City of Brampton intends on tabling the proposed new Brampton Plan, inclusive of the proposed MTSA Land Use Plans and associated policies, for Council adoption on November 1, 2023. The last iteration of the draft Brampton Plan was released in December 2022, at which time modifications were anticipated by City Staff. In our view, the draft MTSA policies and land use designations can only be considered together with the full policy framework of the draft Brampton Plan. Accordingly, we reserve to the right to modify or provide additional comments until such time as all proposed Brampton Plan policies, maps and schedules are released in final draft for review and comment.

Should you have any questions, please contact the undersigned.

**Yours truly,**

**Nikhail Dawan, B.E.S.  
Planning Associate**

cc: Amexon Holdings Ltd.  
M. Gagnon/R. Domes, Gagnon Walker Domes Ltd.