



Principals

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

**Attention: Mayor and Members of City Council  
Peter Fay, City Clerk  
Steve Ganesh, Commissioner, Planning, Building and Growth  
Management  
Henrik Zbogar, Director, Integrated City Planning**

**Subject: LETTER OF CONCERN  
8671 Heritage Road – Mr. Zia Mohammad and Ms. Shamyla Hameed.  
Item 10.4.3: November 1, 2023 City Council Meeting; Recommendation  
Report – Proposed Adoption for Revised City of Brampton 2023  
Official Plan (Brampton Plan)**

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to Mr. Zia Mohammad and Ms. Shamyla Hameed (Client); the registered owners of the property municipally known as 8671 Heritage Road in the City of Brampton (subject site). The subject site is comprised of one (1) parcel measuring approximately 1.30 hectares (3.22 acres), with a street frontage along Heritage Road.

We write to express our Client's concerns regarding the recommendations contained within the City of Brampton's Recommendation Report (dated November 1, 2023) entitled "Proposed Adoption for Revised City of Brampton 2023 Official Plan (Brampton Plan)", which recommends that City Council authorize the passing of a by-law (draft by-law attached as Attachment 1 to the Recommendation Report) to repeal the 2006 City of Brampton Official Plan and to adopt the 'new' proposed 2023 City of Brampton Official Plan.

**BACKGROUND: FAA APPLICATION**

Our Client submitted an application on December 6, 2021 to Amend the City of Brampton Bram West Secondary Plan (Area 40 (d)), Riverview Heights Block Plan and Zoning By-law 270-2004, pursuant to City File OZS-2022-0002 ("Formal Amendment Application"). Through this Formal Amendment Application our Client proposes a seven (7) storey, 122 unit seniors care home accessed by a future extension of Hammerslea Court, the

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adaptive reuse of the existing dwelling as an accessory building to the primary seniors residence, and the dedication of lands associated with environmental features. Our Client’s proposal aims to provide much needed housing for seniors in the Bram West community at a density and massing that is appropriate, given the site’s locational attributes. The Formal Amendment Application, as submitted, has been advanced in the context of the current, in-force 2006 City of Brampton Official Plan and Bram-West Secondary Plan policies as they pertain to the subject site.

## **OVERVIEW of the ‘NEW’ PROPOSED 2023 CITY of BRAMPTON OFFICIAL PLAN LAND USE DESIGNATIONS & OVERLAYS**

The following are the key designations and overlays that are proposed to apply to the subject site pursuant to the final draft of the ‘new’ proposed 2023 City of Brampton Official Plan:

- Schedule 1 - City Structure:
  - ‘Community Areas’;
  - ‘Natural Heritage System’;
  - ‘Support Corridor’ (Heritage Road);
- Schedule 2 - Designations:
  - ‘Neighbourhoods’;
  - ‘Natural Heritage System’;
- Schedule 3C – Streets Network:
  - ‘Minor Arterial’;
- Schedule 5 – Provincial Plans & Policy Areas
  - ‘Designated Greenfield Area’;
- Schedule 6 – Natural System
  - ‘Unevaluated Wetland’;
- Schedule 6B – Natural System Features and Areas
  - ‘Valleyland and Watercourse Corridor’;
  - ‘Woodland’.

## **CONCERNS with the FINAL DRAFT of the ‘NEW’ PROPOSED 2023 CITY of BRAMPTON OFFICIAL PLAN**

GWD has reviewed the aforementioned Recommendation Report, including the final draft of the ‘new’ proposed 2023 City of Brampton Official Plan. Our Client has concerns with the final draft of the ‘new’ proposed 2023 City of Brampton Official Plan as generally highlighted below:

### **1. *Opposition to Proposed Building Typology Permissions/Land Use Designations***

In accordance with Table 5 of the ‘new’ proposed 2023 City of Brampton Official Plan, permitted building typologies are determined based on their location relative to designations and overlays in Schedule 2 and Schedule 1A respectively. We note



that the subject site is proposed to be included as being located within the Neighbourhoods designation and abutting a Support Corridor overlay (Heritage Road). As a result, the ‘new’ proposed 2023 City of Brampton Official Plan proposes that the subject site is permitted to be developed with building typologies up to ‘Low-Rise Plus’. Pursuant to Table 4, Low-Rise Plus permits a height range up to and including four (4) storeys. This proposed building height restriction is inappropriate and is insufficient to facilitate our Client’s proposed seniors home.

Accordingly, our Client has concerns with the impact that the subject site’s proposed land use designation, overlay and associated policies will have on the City of Brampton’s previous and on-going review of the Formal Amendment Application. With the aforementioned in mind, we believe that mid-rise building typology permissions is more appropriate for the subject site. To facilitate this, we request the following two (2) potential options for modification to the Brampton Plan:

- **Modification Request Option 1:** Remove that portion of the subject site designated ‘Neighbourhoods’ and replace with a ‘Mixed-Use’ land designation on Schedule 2.
- **Modification Request Option 2:** Amend Table 5 of the ‘new’ proposed 2023 City of Brampton Official Plan to permit ‘Up to Mid-Rise’ for sites designated Neighbourhoods along a Support Corridor overlay.

Any policy change that would negatively impact or prevent our Client from developing the proposed 7 storey seniors home on the subject site is not supported.

## **2. Natural Heritage**

Our Client has been working with the City of Brampton and Credit Valley Conservation Authority since Pre-Application Consultation to confirm the limits of development based on natural features within and abutting the subject site. Our Client opposes policy changes that would have the effect of applying more stringent development constraints to environmental features and the removal of policy flexibility that allows for the determination of the final environmental constraints (and associated Natural Heritage land use designation) to be determined through the review of detailed studies completed as part of our Client’s ongoing Formal Amendment Application and future Draft Plan of Subdivision/Site Plan Approval Applications.

## **Closing Remarks**

As summarized above, our Client has significant concerns with respect to the final draft of the ‘new’ proposed 2023 City of Brampton Official Plan. On behalf of our Client, GWD **requests that City Council refer the Recommendation Report back to Planning Staff to provide the opportunity for our Client and Planning Staff to participate in additional consultation in an effort to address our Client’s concerns.**



It is GWD's understanding that the Region of Peel remains the approval authority as it pertains to the final approval of the 'new' proposed 2023 City of Brampton Official Plan at this time. We reserve right to provide additional/revised comments to the City of Brampton and/or the Region of Peel on behalf of our Client in connection with this matter prior to final approval.

**Yours truly,**

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

cc: Mr. Zia Mohammad and Ms. Shamyia Hameed  
M. Gagnon/N.Klymciw, Gagnon Walker Domes Ltd.