

February 28, 2019

The Honourable Steven Clark  
Minister of Municipal Affairs and Housing  
College Park, 17<sup>th</sup> Floor  
777 Bay Street  
Toronto, Ontario  
M5G 2E5

**Re:**

- **Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the *Planning Act* to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Framework for Provincially Significant Employment Zones**

Dear Minister Clark:

The City of Brampton appreciates the opportunity to provide comments and feedback on the proposed changes to the Growth Plan 2017, and through this letter, submit our official comments for the Minister's consideration. The City notes that our review and comments are limited only to the official documentation issued by the Ministry of Municipal Affairs and Housing (MMAH) on January 15, 2019 through the Environmental Registry of Ontario website. The four documents collectively form the proposed changes to the Growth Plan and our assessment addresses the key policy changes and their potential impact on the City of Brampton. The key proposed changes are categorized into eight main components described below with detailed comments included in attached Appendix A, supported by the summary table in Appendix B.

1. Intensification and Density Targets

Under the proposed MMAH changes, the intensification targets relevant to the Region of Peel are maintained at 60% for all annual new residential development within the delineated built-up boundary, however, the proposed timeline to implement it has now been modified.

The City of Brampton believes that the current phased implementation approach after a Municipal Comprehensive Review process (MCR) is beneficial, and helps to ease development in achieving the intensification targets set by MMAH. By requiring an abrupt implementation target of 60% immediately after an MCR, the City of Brampton is concerned this will create additional challenges and complexities to the implementation process and in achieving the ultimate intensification goal.

Reduced density targets of future development in designated greenfield areas from 80 residents/job per hectare to 60 residents/job per hectare are proposed; excluding employment areas. This is not expected to be implemented equally between the lower-tier municipalities. However, the City of Brampton supports the clear exclusion of the characteristically low density employment areas which will facilitate achieving the density targets proposed.

## 2. Planning for Employment

The province has identified 29 Provincially Significant Employment Zones (PSEZ) that are deemed significant to the regional and provincial economy and that would require provincial input and approval prior to any non-employment use conversion. The City of Brampton requests MMAH to consider the proposed Employment Zones in accordance with the current City of Brampton 2006 Official Plan, and the employment lands reflected in the City of Brampton Vision 2040 this includes but not limited to:

- Existing employment lands extending along the west side of Heritage Road north of Steeles Avenue should be included as part of the 401-407 Meadowvale Zone
- Existing employment lands extending along both sides of Mississauga Road north of Steeles Avenue should be included as part of the 401-407 Meadowvale Zone
- Existing employment lands along Hwy 410, East of Kennedy Road south of Clark/Eastern Avenue
- Existing employment lands along Highway 410 south of Mayfield
- Existing employment lands west of West Drive south of Queen Street East as part of the Pearson Airport Hub Zone.

Currently no mechanism to refine Employment Zone boundaries prior to a Municipal Comprehensive Review (MCR) has been provided. Therefore, the City requests that a defined process to address changes to the proposed PSEZ mapping be clarified and detailed. This will give municipalities time to ensure appropriate lands have been incorporated in the zones for future safeguarding.

The status of MTSA's located within PSEZ requires additional clarity as conflicting policies may occur. Within the city of Brampton, the Bramalea Go station is located within a proposed PSEZ and any higher density, mixed use and MTSA related allocation will conflict with the PSEZ policies. The city requests information on how such issues would be addressed.

The City of Brampton notes that the Brampton City Council approved on April 26th, 2017 a number of employment land use conversions through a formal MCR process, commenced under the 2006-2017, Growth Plan by the City. Based on Council resolution PDC081 the City requests that the subject lands, as shown in attached map, be removed from the proposed PSEZ boundaries.

## 3. Major Transit Station Area (MTSA)

Currently the 2006 City of Brampton Official Plan identifies five MTSA areas throughout the City of Brampton, and an additional four mobility hub areas which have an enhanced level of adjacent development and infrastructure. The City supports the intention of the proposed MMAH changes to streamline the approach for delineating MTSA's as they are key structuring elements of built form in a community and will be focal points for intensification. The high densities in such areas and their location along higher order transit corridors should support and foster increased transit ridership. The distribution of the MTSA areas throughout the City will ensure that development density is appropriately spread to avoid isolated density

pockets. This will support the City's transit strategy and long term intensification goals set out in the 2040 vision.

The City of Brampton is concerned however where such MTSA's are located within proposed PSEZ areas. Superseding policies are not clarified as such cases would result in potential policy conflicts such as introduction of mixed use and non-employment uses within MTSA's which conflicts with the PSEZ protection of employment lands.

Clarity on such cases is requested particularly as this may apply to the Bramalea Go station area within the City of Brampton.

#### 4. Settlement Boundary Expansion

The Settlement Area boundary within the City of Brampton is well defined and currently encompasses almost the entire city. Therefore, proposed policy changes regarding further expansion of the boundary have no impact on the City of Brampton and its future growth.

#### 5. Small Rural Settlements

Policy changes in this regard do not apply to the City of Brampton as no designated Rural Settlements or Hamlets are currently identified in the 2006 Official Plan.

#### 6. Natural Heritage System and Agriculture Area Mapping

There are no implications from the proposed changes related to Natural Heritage System (NHS) and Agriculture Area mapping on the City of Brampton, as all current NHS mapping for the City is sufficiently detailed and accurate.

#### 7. Municipal Comprehensive Review (MCR)

In principal, the City of Brampton supports allowing certain planning matters to proceed prior to an MCR, especially with respect to establishing employment targets and delineating MTSA areas early on. However, there is a risk associated in doing so for other more complex matters, such as the conversion of employment lands, which is best addressed more holistically within a full MCR process.

#### 8. Transitional Development

At the moment there are several applications (submitted and under appeal) within the City of Brampton that will be subject to this transitional regulation, particularly those subject to the previous 2006 Growth Plan, and so it is necessary to identify them to MMAH (as noted in Appendix A).

The City of Brampton notes that the Brampton City Council approved on April 26th, 2017 and June 21, 2017 a number of employment land use conversions through a formal MCR process, commenced under the 2006 Growth Plan by the City. Based on Council resolutions PDC081-2017, PDC152-2017 and PDC153-2017, the City requests that the subject lands, as shown in attached map, should be addressed through the transition regulation such that Official Plan Amendments which were adopted before July1, 2017, pursuant to a

municipal comprehensive review, are governed by the Growth Plan in effect at the time of adoption and not by the Growth Plan 2017. Specifically, this refers to City of Brampton OPAs 126, 127, 128, 129, 130 and 133.

The City of Brampton would like to once again thank MMAH for the opportunity to provide feedback on important proposed legislations and hope that the comments and recommendations herein will be taken into serious consideration as part of the policy consultation process.

Sincerely,

Rick Conard,  
Acting Commissioner, Planning and Development Services  
City of Brampton  
(905) 874-2440

*Attachments:*

- *Appendix A: Detailed City of Brampton Comments on Key Items of the Proposed Changes*
- *Appendix B: Summary Table of Proposed Key Policy Changes to The Growth Plan 2017*