



Provincial Land Use Plans Branch
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RE: Environmental Registry of Ontario Posting 019-6177 – Review of A Place to Grow and Provincial Policy Statement

From: Steve Ganesh, Commissioner (A) – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as ‘the City’) appreciates the opportunity to provide comments on the proposed changes outlined through the Environmental Registry Ontario posting regarding the Review of a Place to Grow and Provincial Policy Statement (the “Documents”). The City has provided preliminary comments to the discussion questions provided but recognizes that further information is required. The City requests the Province consult with municipalities on any specific changes to these Documents. The proposal provides high level information only, making it difficult to determine the full extent of the impact of the proposed changes. Additional time and information is required to understand how these would impact implementation of the City’s guiding planning policies.

The City, as a regular user of the Provincial Policy Statement and Growth Plan, does not find that these policies hinder the development of housing. Rather, the Documents consider the greater context in which housing is developed to ensure the creation of vibrant and complete communities for Brampton residents to live, work and play in throughout the ages and stages of life. New housing cannot be developed outside of the context of providing employment options that supports a local workforce, delivering essential community services, providing for a mix of retail and commercial spaces to serve the population, and providing for parks and open spaces that are integral for the health, recreation and enjoyment of residents. Considerations for the realities of a changing climate and reducing the city’s greenhouse gas emissions is critical to the long-term sustainability of our planet, which greatly influences how the City plans and manages new growth. The Provincial Policy Statement and Growth Plan seek to build communities in a manner that considers the holistic context in which planning takes place, while recognizing the unique geographic context of the Greater Golden Horseshoe.

The City appreciates actions that reduce redundancy between these documents. However, this should not be at the expense of recognizing the unique context which the Growth Plan is required to plan for, particularly with the magnitude of growth and development that occurs within this geographic area. Currently, the City has over 19,000 units currently in the development process, with 9,000 active applications ready for building permit. There is significant growth occurring in the city and policy plays a key role in guiding how this growth ensure the overall health and well-being of Brampton residents, its economy and environment.



The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the Discussion Questions outlined through the Environmental Registry of Ontario posting and identified through **Appendix 1**. Please let us know if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Ganesh".

Steve Ganesh, MCIP, RPP
Commissioner (A),
Planning, Building and Growth Management

Appendix 1: Discussion Questions regarding the Proposed Review of a Place to Grow and Provincial Policy Statement

Discussion Questions:

1. *What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?*

The City has provided preliminary responses to the proposed changes based on the information provided through this posting. Growth management is integral to supporting new housing supply in an effective and efficient manner. Growth management considers not just the building of a new unit, but the importance of local jobs, community services, a healthy-built environment, access to parks and open space and other amenities that Brampton residents use daily to ensure service delivery and a high-quality of life for existing residents and new residents. Protection of Brampton's cultural and natural resources, as well as employment areas are equally as important as the development of new housing to successfully manage growth and make the community liveable for all residents.

Proposed Changes	City Response
Residential Land Supply	
Settlement Area Boundary Expansions – streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth	The City recognizes the important role that regional planning has in managing growth in a coordinated manner. The Region has an important role to play in managing SABE in coordination with infrastructure planning, recognizing the planning horizon in unlocking a sufficient supply of land to support intensification rather than further suburban sprawl. The Province should evaluate how this type of change ensures that growth is effectively managed and considers climate impacts.
Rural Housing – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas	The City recognizes the importance of protecting rural lands. They have a unique character that differs significantly from the urban lands. The development of rural lands should be considered cautiously, as they play an important role for conservation, cultural and natural heritage tourism and may provide essential agriculture that supports local food production.
Employment Area Conversions – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate	The City recommends that existing protection for employment areas (through the Municipal Comprehensive Review process) should continue to apply, as there is significant pressure to convert due to the lower cost of land. Brampton is able to meet its population target without the need to convert essential employment areas that provide critical jobs for residents of the City. Although mixed use developments are appropriate in specific transit-oriented areas, low density employment areas need

	<p>to be maintained and protected from sensitive land uses. The loss of these lands would be detrimental to the economic success of Brampton and Ontario. Converting employment land on the promise that mixed-use developments will provide a sufficient number or quality of jobs is often not the outcome of conversions. Significantly more jobs are provided if the lands remained industrial. Ensuring employment land and major office employment that employ a large number of residents, rather than population-related employment that usually are only a small number of jobs, is critical to growth management in Brampton, ensuring that there are sufficient jobs for new residents coming to Brampton. Over 65 % of Brampton’s workforce leaves the City of Brampton to go work elsewhere. Ensuring that Brampton residents can be employed in the city is critically important to support the creation of a great community; as a result, existing employment areas should be protected. Industrial Vacancy rates are less than 1% and despite COVID, office vacancy rates are low especially for 4 & 5 star office buildings. Smaller industrial/ manufacturing companies are finding it harder to find space. Older industrial areas provide cheaper and smaller unit opportunities for new entrepreneurs and small business that provide important jobs for the city.</p>
<p>Attainable Housing Supply and Mix</p>	
<p>Housing Mix – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs</p>	<p>The proposed changes here are quite broad.</p> <p>The City is concerned with this in light of another posting related to Bill 23 that proposes the use of a different definition to “affordable”. The City requests that the existing Provincial Policy Statement definition remain to define “affordable housing”. Defining affordability should be focused on what residents can afford based upon their incomes and not the high price the market has been charging.</p>
<p>Major Transit Station Areas – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario</p>	<p>Policy direction providing greater certainty that Major Transit Station Areas will achieve minimum densities is supportable as this will justify infrastructure investment.</p> <p>Although not written, the City assumes this is in relation to updating zoning for MTSA’s within one year. As identified through another posting related to Bill 23, the City is concerned with this reduced</p>

	timeline to effectively study and implement appropriate zoning.
Urban Growth Centres – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur	Policy direction enabling municipalities to readily identify Urban Growth Centres is supportable as local municipalities have a better understanding of opportunities and constraints as to where to direct growth. It is important that financial support be provided to municipalities for public transit investment to support the growth of residents, jobs and new housing.
Growth Management	
Population and Employment Forecasts – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment	The City would need additional information to comment, as the information provided is broad. In principle, the use of the most current and reliable information is supportable.
Intensification – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas	This direction seems to align with how the City seeks to manage growth and direct new housing through intensification, but additional information is required.
Large and Fast-growing Municipalities – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit	Additional information is required to comment.
Environment and Natural Resources	
Agriculture – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations	The City’s position is that the protection of agriculture in both agricultural lands and in rural lands is integral to the long-term sustainability of the agri-food network and to provide locally grown produce to feed healthy and nutrient-rich food to a rapidly increasing population. Consideration of the protection of these lands is integral in light of climate change and impacts to food production internationally.
Natural Heritage – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making,	The City has provided extensive comments on these topics through other ERO postings related to Bill 23. The City identified significant concerns with the

and providing more options to reduce development impacts, including offsetting/compensation (Proposed Updates to the Ontario Wetland Evaluation System)	proposed changes and the potential damage this will have on Brampton's natural heritage system.
Natural and human-made hazards - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk	The City has provided extensive comments on this topic through other ERO postings related to Bill 23. The City identified significant concerns with the proposed changes and the potential damage this can have on Brampton's natural heritage system.
Aggregates – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed	Additional information is required to comment.
Cultural heritage –policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply (Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022)	The City has provided specific comments on this topic through the relevant ERO posting. The City is concerned with the loss of valued cultural heritage resources in Brampton.
Community Infrastructure	
Infrastructure Supply and Capacity – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning	This type of master planning is conducted in alignment with forecasted growth. Additional information is required to provide comments.
School Capacity – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education's proposal to support the development of an urban schools' framework for rapidly growing areas	Throughout Bill 23, the City has identified the delivery of soft infrastructure as a concern, as these services are integral to making communities liveable. This will be critically important to support new growth.
Streamlined Planning Framework	
Outcomes-Focused – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes	Additional information is required to comment. In general, through the pre-consultation process, only necessary studies are identified as application requirements.
Relevance – streamlined policy direction that focuses on the above-	Additional information is required to comment.

noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests	
Speed and Flexibility – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier	The Planning approval process should not be streamlined at the cost of effective community building.

2. *What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?*

The City recognizes that housing policy cannot be approached in a vacuum. It must be considered in the greater context of community building policies. Some of the proposed changes through Bill 23 will have unintended consequences on the creation of complete communities; therefore, housing policies must be considered in the greater context of planning for all residents throughout the various ages and stages of life. Core considerations around community amenities, desirable urban spaces, public transit access and options, parks and recreational space, cultural heritage, arts and cultural events, programming, and the efficient delivery of services are key elements that also attract people to live in these homes. The City is concerned with some of the proposed changes through Bill 23 as they impact the ability of the City to deliver these important elements that make a community a desirable place to live, thereby making it an attractive place for new development and investment to occur. The reduced capacity for site plan control for developments of 10 units or less, parkland dedication, environmental protections, and funding available to municipalities will lead to less desirable places where people would not want to reside.

3. *How should the government further streamline land use planning policy to increase the supply of housing?*

The City does not agree that planning policy is a major barrier to increasing the supply of housing. A significant number of development applications and approvals have been in the “pipeline”, with policy being used to guide the effective development of these new units into existing and new community areas. Currently, the city has over 19,000 units associated with active applications (14,500 apartment units, 2,800 townhouses, 46 semi-detached, 1,332 single detached units and 253 retirement home units).

The City recognizes that increasing the supply of housing has many barriers, such as expensive building materials, inability to access needed materials, challenges in finding and paying for needed labour to build, and instability in financing these projects. Once those barriers have been overcome, policy provides the context and guide for the successful development of new housing while recognizing the long-term relationship that this new development and subsequent residents, employers or services have to the surrounding context. The City does not find that the policy direction outlined through provincial policy is complex, rather it is robust for the purpose of creating vibrant, healthy, safe and liveable communities.

4. *What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?*

The Documents provide clear and strong policy direction to increase housing supply through intensification, and this direction should be retained. Effectively integrating land use planning and transportation planning is critical to delivering new housing in a sustainable manner, sustainably moving residents throughout the city. Supporting intensification, compact development, and planning for complete streets are all key elements to delivering more housing in Brampton.

Any updates need to consider that land use planning is critically tied to transit planning and coordination with Metrolinx is important to support higher densities and intensification where higher-order transit is planned. This must be aligned with significant investment in public transit for the City of Brampton. Policies that support a housing mix in communities should provide options for aging in place.

Through the extensive process to prepare Brampton Plan, the City's proposed new Official Plan, the 15-minute neighbourhood concept has been critically important to recognizing how the city needs to grow. This concept calls for delivering more housing where people can live, work, play, and learn within a 15-minute walk, bike or accessible public transit ride. This is an important concept to integrate into any updates to the Documents. In addition, to ensure sprawl does not continue in suburban areas of the Greater Golden Horseshoe, housing policies should be focused on intensification and infill, providing policy direction on missing middle typologies as part of new development so that the need for infill within these lands would not arise in the future. Employment area conversion as a means of increasing residential land supply needs should be avoided as employment areas, once converted, may never be returned to employment uses. It will be worthwhile to first assess how much additional housing can be realised through intensification, when considering employment area conversion. PPS policy 1.4.1 provides strong direction in this regard and should be retained.

5. *What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?*

The City recognizes that there are important elements throughout these Documents that are used by planners in our everyday work and refinements to these planning documents have occurred over the years to reflect updated planning principles. As a result, elements that are currently in the existing Provincial Policy Statement or A Place to Growth should be included in a new policy document.