

March 7, 2023

RE: Environmental Registry of Ontario Posting 019-6619 – Municipal Reporting on Planning Matters – Proposed Minister’s Regulation under the Planning Act

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

To Whom It May Concern:

The City of Brampton (herein referred to as “the City”) appreciates the opportunity to provide comments on the proposed changes outlined through the Environmental Registry of Ontario posting regarding Municipal Reporting on Planning Matters. As Canada’s 9th largest city and the fastest growing of the 25 biggest cities, the City of Brampton recognizes the importance of using data to make evidence-based decisions. The data points outlined in the ERO posting presents an opportunity for the City to continue collaboration efforts with the Province to meet the goal of developing 1.5 million new homes by 2031.

The City’s business intelligence portfolio for development tracking has advanced significantly over the past two years. The City currently tracks and reports on the following KPI’s on a weekly basis:

- **Total # of Applications Submitted**
 - By application type - Official Plan Amendment, Zoning Bylaw Amendment, Draft Plan of Condo, Draft Plan of Subdivision, Site Plan, Consent & Minor Variance
- **Total # of Residential Units Proposed**
 - By application type - Official Plan Amendment, Zoning Bylaw Amendment, Plan of Subdivision & Site Plan
 - By housing typology - detached, semi-detached, townhouse, apartment
- **Proposed Gross Floor Area (GFA) of Industrial/Commercial/Institutional Uses**
- **Total # of Building Permits Issued**
 - By type of construction **this breakdown is tracked on a monthly basis*
 - New Residential (detached, semi-detached, townhouse, multiple unit building, 2 unit dwellings) and
 - Existing (Additions, Alterations, Revisions/Demolitions/Miscellaneous
- **Total # of Building Inspections Completed**

The City is confident it can report on the data sets identified for the Quarterly Reports, as most of these KPI's are currently tracked, save and except for four data points noted in Table 1. In 2019, the City began using the Accela software to process and track development applications. Similar data was provided to the Building Industry & Land Development Association (BILD) for their 2022 Municipal Benchmarking Study, which ranked Brampton 4th in fastest approval timelines out of 16 municipalities.

Please see below for specific comments on individual aspects of the requested quarterly data sets:

**These comments also apply to the 5-year historical reporting request.*

TABLE 1: QUARTERLY REPORTING		
Data Element	Information for Collection	City Comments
Land Severance (Consent) Minor Variance Official Plan Amendment Plan of Condo Plan of Subdivision Site Plan Zoning Bylaw Amendment	Application Status	The City is committed to streamlining the approvals process to increase housing supply faster, however, commenting/resubmission timelines of external agencies and the applicant often prolong the approval timeline. The City recommends adding a new data point to track the number of days an application is sitting with: <ul style="list-style-type: none"> • An applicant for resubmission, • A Conservation Authority and; • A line ministry for comment. <i>*for all future applications</i>
Land Severance (Consent) Zoning Bylaw Amendment Minor Variance Site Plan Draft Plan of Condo Plan of Subdivision	Application Status - If appealed to the OLT or Local Appeal Body, whether it is an appeal of: <ul style="list-style-type: none"> • Condition • Decision • Non-decision • Third party appeal 	The City does not currently track this information by application type. To provide the requested data, the City will have to develop a new process and will have a limited ability to provide the historic data. <i>*this comment is applicable to all data elements noted*</i>

<p>Official Plan Amendment</p> <p>Plan of Subdivision</p> <p>Zoning Bylaw Amendment Applications</p>	<p>Proposed Designation</p> <p>Heritage Status</p>	<p>The City does not currently track this information. The City requests clarification on what is meant by “Proposed Designations”. Is this measure for the total number of Notices of Intention to Designate (NOID) issued relative to applications received?</p> <p>The City requests further clarification on the data requested for “Heritage Status”. Is this measure for the total number of applications where a property has been listed or designated?</p> <p>To provide the requested data, the City will have to develop a new process and will have a limited ability to provide historic data.</p> <p><i>*this comment is applicable to all data elements noted*</i></p>
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Please see below for specific comments on individual aspects of the requested annual data sets.

**These comments also apply to the 5-year historical reporting request.*

TABLE 2: ANNUAL REPORTING		
Data Element	Information for Collection	City Comments
<p>Community Infrastructure and Housing Accelerator Tool & Minister’s Zoning Orders</p>	<p>Number of building permits issued to date.</p> <p>Downstream planning approval status</p>	<p>The City currently tracks Building Permits issued for existing and new construction. The City requires clarification on whether the data point is only for new construction or if it includes existing (additions, alterations and revisions/demolitions/miscellaneous) as well.</p> <p>The City requests further clarification on the definition of ‘downstream planning approval status’ and the reporting requirements for this data point.</p>
<p>Areas identified as a Strategic Growth Area with a minimum target</p> <p>Employment Areas</p> <p>MTSA Boundaries</p>	<p>Indicate as part of the data attributes the applicable density targets, development phasing policies and other relevant policy or zoning</p>	<p>The City currently has the geo-spatial data, but not the attributes being requested.</p> <p><i>*this comment is applicable to all data elements noted*</i></p>

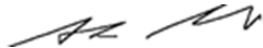
	requirements, where applicable and appropriate.	
Areas Identified as a Strategic Growth Area with a minimum target	<i>*clarity required on data element</i>	The City requests clarification on whether the data is to be provided for locally significant Strategic Growth Area's as identified in local plans or those SGA's defined by the Growth Plan (Urban Growth Centres, and Major Transit Station Areas)?
Areas Subject to an Intensification Target	<i>*clarity required on data element</i>	The City requests clarification on the difference between this data element and the one preceding it (areas identified as SGA's with a minimum target). Is the expectation that areas within the Built-up Area, and Designated Greenfield areas are also reported on?
Employment Areas	<i>*clarity required on data element</i>	The City requests clarification on what is considered an employment area, and the distinction of employment lands. Staff interpret 'employment areas' to be areas that facilitate jobs (inclusive of mixed-use and urban areas that accommodate office uses); and 'employment lands' to be lands that are protected for commercial and industrial uses.
Employment Area Conversions	<i>*clarity required on data element</i>	Employment area conversions are a regional responsibility and are reviewed as part of the Municipal Comprehensive Review (MCR). The City can provide historical data for this but does not anticipate annual employment conversions as this work can only be completed at the time of an MCR. Annual data would remain unchanged. The City recommends that existing protection for employment areas should continue to apply, as there is significant pressure to convert these lands for residential land uses due to the lower cost of land. The loss of these lands would be detrimental to the City's economic success. 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.
Existing Water and Wastewater Infrastructure	<i>*clarity required on data element</i>	The Region of Peel manages water and wastewater infrastructure in the City. Regional input would be required for this data element.
MTSA Boundaries	<i>*clarity required on data element</i>	Once MTSA Boundaries are established, they cannot be modified until the next Regional Official Plan Review. Current MTSA boundaries are anticipated to be in place by November 2023. The City can provide historical data for this, but does not anticipate annual changes to these boundaries as this work can only be completed through the Regional Official Plan Review. Annual data will remain unchanged.
MTSA Boundaries	Indicate as part of the data attributes any applicable inclusionary zoning.	The City requests clarification on the data attributes required for inclusionary zoning. Through O.Reg 232/18, the City is required to comply with reporting requirements every 2 years as it relates to IZ.
Settlement Area Boundaries	<i>*clarity required on data element</i>	All of Brampton is within a Settlement Area Boundary, with the exception of those lands that are Designated Greenfield. This data element is not applicable to Brampton.
CIHA Tool & MZO’s Areas Identifies as a Strategic Growth Area with a minimum target Areas Subject to an Intensification Target Employment Areas Employment Area Conversions MTSA Boundaries	Description of the File Format Contact Information	The City requests clarification on the general format options for the data, and further clarification on whose contact information is to be provided. The City requests further clarification on the data presentation, and whether this is to be referenced visually or displayed as background metadata. <i>*this comment is applicable to all data elements noted*</i>

Settlement Area Boundaries		
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The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments. City staff welcomes the opportunity to have further discussions with your office on requested clarifications such as: boundaries for Major Transit Stations, Municipal Comprehensive Reviews and Water/Wastewater servicing.

Sincerely,



Steve Ganesh, MCIP, RPP
Commissioner
Planning, Building and Growth Management
Direct Line: (647) 624-8533