

## **Appendix A: Detailed City of Brampton Comments on Key Items of the Proposed Changes**

### **Growth Plan Principles**

***The City of Brampton requests that wording be defined more clearly or revert to the original text to avoid misinterpretation.***

- Wording in Section 1.2 replaces “offer a wide variety of choices for living” with “have sufficient housing supply that reflects market demand and what is needed in local communities.” The City of Brampton is concerned with the proposed wording revision as it is not consistent with the applicable PPS or the sustainable city structure policies of the City of Brampton’s 2006 Official Plan. Using general terminology such as “need” creates a level of vagueness on the timing context of such need (now or the future) and by noting market demands, this can be interpreted as a requirement for market studies to justify such “needs” as part of the development process. Although we appreciate the attempt to create more flexibility in wording to facilitate residential development, the City of Brampton requests that wording be defined more clearly by replacing it with more a more definitive approach on the intent such as “offer a range of housing types that cater to multicultural needs, age appropriate dwelling units, and various family sizes”.

### **Intensification and Density Targets**

***The City of Brampton supports the proposed overall targets and flexibility provided to set new targets, however generally feel that the reduced density may not facilitate transit servicing. The City of Brampton also requests that the current phased approach for implementation of intensification remain.***

- The City of Brampton supports intensification and density targets that reflect the objective of supporting provincial (and municipal) transit investments.
- The City of Brampton notes that the revised designated greenfield area density target for Peel Region of 60 residents and jobs per hectare (down from 80) does not equate to the 60 target in the 2006 Growth Plan, as the new target retains the Growth Plan 2017’s exclusion of employment areas. This effectively makes achievement of the target easier as employment lands typically have lower density land uses.
- Related to the above, the City notes that new development in designated greenfield areas needs to be at densities that support transit. As outlined in the province’s Transit-Supportive Guidelines, density in the range of 50 to 80 residents and jobs per hectare can only support basic transit service (one bus every 20-30 minutes). More frequent bus service (one bus every 10-15 minutes) requires a minimum density of 80 residents and jobs per hectare. The City of Brampton questions whether a density of 60 residents and jobs per hectare exclusive of employment areas is high enough to support the provision of transit service at levels that will foster the choice of transit as a viable replacement for trips that would otherwise be made by car.
- Further to the above, the City notes that higher densities support the development of Complete Communities, which meet people’s needs for daily living throughout an entire lifetime by providing convenient access to an appropriate mix of jobs, local services, a full range of housing, and community infrastructure including affordable housing, schools, recreation and open space and where convenient access to public transportation and options for safe non-motorized travel are provided. Brampton’s Official Plan requires that all new communities and new development within existing communities be planned to be Complete Communities.
- The City of Brampton acknowledges and supports clarification in Amendment 1 that intensification should be prioritized around strategic growth areas while also being encouraged generally

throughout the delineated built-up area. This aligns well Brampton's 2040 Vision, which focuses growth in the Downtown and Uptown urban cores and in Town Centres, several of which are within the built-up area.

- Although the intensification target remains unchanged relative to the city of Brampton, the conformity timeline has now been modified to eliminate the phased intensification approach to require a 60% annual residential intensification target for delineated built-up areas immediately following an MCR. The City of Brampton feels the abrupt intensification requirement from the current Official Plan targets to 60% without a phased approach (50% from MCR approval to 2031) will be difficult to implement and create an adverse impact on growth in the City. Foregoing a transitional phased approach will create confusion. The City recommends the current phased approach remain.

### **Planning for Employment**

***The City of Brampton supports the proposed changes relevant to employment land uses overall, however there is concern in allowing employment land conversion prior to an MCR. The City requests revisions to the proposed Provincially Significant Employment Zone boundaries and clarification on the map refinement process.***

- The City of Brampton supports the retention of elements of existing policy 2.2.5.8 regarding land uses adjacent to or near major goods movement facilities and corridors in proposed policy 2.2.5.5. the City favours, however, retention of the stronger "protection" wording from the existing policy in place of the "preserve" wording used in the proposed policy.
- The City of Brampton questions the merits of permitting conversions of employment land prior to the next municipal comprehensive review (proposed policy 2.2.5.10). The City of Brampton contends that such applications are best considered holistically, as this facilitates consideration of the collective impact of all applications on employment lands. It also offers the opportunity to link the consideration of such applications to other policy areas being addressed in the municipal comprehensive review.
- The City of Brampton acknowledges and welcome proposed policy 2.2.5.12, which specifies that proposed policy 2.2.5.10 will not apply in provincially significant employment zones.
- The City of Brampton requests clarification regarding item (b) in proposed policy 2.2.5.10: "maintain a significant number of jobs on those lands". How is "significant" defined? If left open to interpretation, this will lead to dispute during the consideration of requests to convert employment lands. The City of Brampton recommends that the policy use wording along the lines of "maintain at least as many jobs on these lands as the employment area designation permitted". This is also a concern in proposed policy 2.2.5.14.
- The City of Brampton supports the removal of references to, and policies specific to, Prime Employment Areas. The City argued against the addition of this designation to the Growth Plan 2017, primarily on the basis that the designation assigned more value over the long term to these lands as compared to other employment areas and that additional protection of these lands would be better addressed by refining the employment land conversion policies.
- Relevant to the Provincially Significant Employment Zone mapping, the City of Brampton suggests a mechanism to refine the mapping similar to the suggested process for Natural Heritage System and Agriculture areas. Clarity on refinement timelines and the process in finalising the mapping is required, to provide guidance for municipalities in achieving accurate mapping for the Provincially Significant Employment Zones.

- Within the City of Brampton, some areas not accurately reflected in the Provincially Significant Employment Zone mapping provided and should be refined and addressed through a consultation process. There are lands that should be included within the PSEZ as per the current City of Brampton 2006 Official Plan which have not been reflected, 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.
- 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, be removed from the proposed PSEZ boundaries.
- 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.

### **Major Transit Station Areas**

***The City of Brampton generally supports the proposed changes; however further clarity is required to allow implementation flexibility and to ensure a more streamlined process relevant to lower-tier municipalities; such as exemption from appeals when implementing upper-tier MTSA boundaries.***

- The City of Brampton supports the intention to streamline the approach for delineating Major Transit Station Areas (MTSAs). MTSAs 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 supports and should foster increased transit ridership.
- The City of Brampton questions the removal of policy wording allowing for the averaging of densities where there are four or more MTSAs along the same priority transit corridor (existing policy 2.2.4(c)). This approach offers municipalities more flexibility while still ensuring that development on average achieves transit-support densities than the proposed approach (seeking Ministerial approval of revised MTSA density targets) would. It also allows for greater municipal control over land use planning than the proposed approach would – municipalities have better “on the ground” understanding of local land use and transportation conditions and plans. The Province has an important role to play in setting density targets, but should not delve too deeply into local plans for achieving the targets.
- Regarding the proposed policy to allow Ministerial approval of lower density targets, the City of Brampton requests clarification regarding qualifying condition (b): “[because] there are a limited number of residents and jobs associated with the built form, but a major trip generator or feeder service will sustain high ridership at the station or stop”. This implies that the major trip generator is located outside of the MTSA. If this interpretation is correct, consider revising the policy to read

“...but a major generator accessed by transit via the station or stop or feeder service will sustain...” for clarity.

- The City of Brampton supports, with caveats, the proposed policy allowing upper- and single-tier municipalities to delineate MTSA boundaries in advance of the next municipal comprehensive review, provided that it is done in accordance with applicable sections of the Planning Act.
- Further to the above, “piecemeal” delineation of MTSA boundaries by upper-tier municipalities and the Planning Act requirement that lower-tier municipalities amend their official plan accordingly within one year means that lower-tier municipalities may need to amend their official plans more often than is currently the case. If this policy is enacted, lower-tier municipal amendments to their official plans in response to upper-tier direction regarding MTSA boundaries should be exempt from appeal to the Local Planning Appeal Tribunal.
- The City of Brampton supports the retention of policy direction that permits the Province to identify additional priority transit corridors and planning requirements for MTSA’s on priority transit corridors, but request clarification as to how such corridors will be identified and what the role of municipalities will be in this process. Ongoing work by Metrolinx, in consultation with municipalities, on the advancement of the Frequent Rapid Transit Network is a good start, but it is unclear how this and other efforts will be reflected in the Growth Plan.
- The City of Brampton is concerned where 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.

### **Settlement Area Boundary Expansions**

***The City of Brampton requests language that protects NHS from settlement expansion, and include transit serviceability as part additional criteria.***

- The City of Brampton requests stronger language that prohibits expansion into NHS areas be applied, as this provides the possibility for those areas to be developed without an MCR. Currently the language requests avoidance where possible but does not outright prohibit as it does for prime-agricultural lands.
- The City of Brampton also requests that as part of the criteria for potential settlement area expansion, to add lands that will allow for the natural expansion of transit and enhance the transit serviceability of adjacent lands if developed. This will facilitate the efficiency and viability of existing transit systems and is in line with the direction to increase density and development along transit corridors and multi-modal hubs.

### **Transitional Development**

***The City of Brampton notes that specific planning matters subject to the Growth Plan 2006 commenced by the City have not been addressed.***

- Current proposed wording for O. Reg. 311/06 item 3. (6) suggests that planning matters subject to the 2006 Growth Plan commenced by upper and single tier municipalities are exempt from the revised policies, and that their status under the 2006 Growth Plan. The City of Brampton notes that as part of the 2006 Growth Plan, lower tier municipalities would have been the likely planning authority to commence such matters. Therefore, the City of Brampton requests a rewording to read as follows: “Any matter that is described in clause 2 (b) and commenced by a lower-tier, upper-tier or single-tier municipality after June 15, 2006 and before May 18, 2017 that would add any amount

of land to an area of settlement shall be continued and disposed of in accordance with the 2006 Growth Plan as it read on June 16, 2006. O. Reg. 204/17, s. 4 (2)".

- Planning matters which have undergone land use conversion based on a formal MCR process, commenced by the City of Brampton under the 2006 Growth Plan are illustrated in attached map for reference. Although some are subject to an appeal, the City requests that these specific planning matters be addressed through the transition regulation proposed and be exempt from the proposed policies of the Growth Plan for the Greater Golden Horseshoe, 2017 as amended by Amendment 1. Within the city of Brampton this applies to OPAs 126, 127, 128, 129, 130 and 133, which have been approved by City Council through resolutions PDC081-2017, PDC152-2017 and PDC153-2017, on April 26th, 2017 and June 21, 2017.