

City of Brampton Submission to the Ministry

Sandra Bickford
Ontario Growth Secretariat
777 Bay Street, Suite 2304
Toronto, Ontario M7A 2J8

July 29, 2020

Re:

- **Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO 019-1680)**
- **Proposed Land Needs Assessment Methodology for the Growth Plan (ERO 019-1679)**

The City of Brampton appreciates the opportunity to provide comments and feedback on the proposed changes to the growth Plan 2019 and the proposed Lands Needs Methodology. Through this letter, we submit our official comments for the Minister's consideration. The City notes that our comments are limited only to the two documents issued by Ministry of Municipal Affairs and Housing on June 16, 2020, namely the Proposed Amendment 1 and Land Needs Assessment Methodology. Staff assessed the key policy changes and their potential impact on the City of Brampton. As reference, staff also reviewed the supporting document titled 'Technical Report: Greater Golden Horseshoe- Growth Forecasts to 2051' prepared by Hemson Consulting Ltd. for the Ministry of Municipal Affairs and Housing. The key proposed changes are categorised into components described below and in a summary table attached.

Sincerely,



Richard Forward, MBA, M.Sc., P.Eng.
Commissioner, Planning, Building and Economic Development
City of Brampton

CC: Bob Bjerke, Director, Policy Planning
Bindu Shah, Policy Planner III

Attachments:

Appendix 1: Detailed City of Brampton Comments on Key Items of the Proposed Changes
Appendix 2: Summary Table of Key Items of the Proposed Changes to the Growth Plan 2019

Appendix 1 : Detailed City of Brampton Comments on Key Items of the Proposed Changes Proposed Amendment 1 to A Place to Grow

New Planning Horizon to 2051

The City of Brampton supports the extension of the planning horizon to 2051 to support long term planning over a 30-year period.

- Municipalities would be required to plan to the year 2051 as a part of their official plan and municipal comprehensive reviews. The City will work in a collaborative capacity towards the finalisation of growth forecast scenarios for the City through the Peel 2041 Growth Management policy work and the Region Official Plan review.
- The extension of the planning horizon will be reflected in the work plan for the City of Brampton Official Plan review, Growth Management and Monitoring policies in the Plan and other initiatives such as the Transportation Master Plan.

Population and Employment Projections:

The City of Brampton supports the idea of the three growth scenarios for consideration by municipalities and will strive to review and assess these under the direction of and in collaboration with the Region of Peel.

- The scenarios are based on detailed modelling and analysis for consideration (low, reference, and high). Each scenario presents different assumptions on the immigration and economic outlook of the GGH. The 'reference' forecast is identified as the most likely future outcome which anticipates the GGH will grow to 15 million people and 7 million.
- The development of these growth scenarios is also intended to provide a foundation to review and assess the Region of Peel final long-term growth allocations and land needs assessment for the City of Brampton for the purpose of long-range planning, infrastructure needs and municipal service delivery.

Provincially Significant Employment Zones (PSEZ) & Major Transit Station Areas (MTSA):

The City of Brampton supports the conversion from employment uses to residential uses within a PSEZ outside of a Municipal Comprehensive Review, provided it is located within an MTSA. The City anticipates that this will help strike a balance between promoting transit-oriented mixed-use development and protecting employment opportunities

- The City of Brampton is working with the Region of Peel on the MTSA delineation exercise.

- This proposed amendment will be helpful for areas in Brampton which are large employment areas in an MTSA, and where the City would like to encourage higher order uses including office and residential without a Municipal Comprehensive Review process.
- The City does note the likely impact of any resulting higher densities in employment areas on infrastructure requirements.

Mineral Aggregate Operations:

The City of Brampton has concerns with the proposed changes to the existing mineral aggregate resources policies would remove barriers to the establishment of new mineral aggregate operations, wayside pits and quarries within the 2019 Growth Plan's identified Natural Heritage System, but not within the Greenbelt.

- This is accomplished by removing the prohibition on new aggregate operations where there are endangered and threatened species (Policy 4.2.8.2a) ii). The goal of this change is to ensure there is an adequate supply of aggregate within proximity to end users and the market area, recognizing the continued population growth within the Greater Golden Horseshoe Area.

The proposed policy would remove the prohibition against new mineral aggregate operations, wayside pits and quarries being established in habitats of endangered and threatened species subject to the Endangered Species Act within Natural Heritage Systems for the Growth Plan. City Staff have concerns with this proposed amendment, particularly for Northwest Brampton (Heritage Heights).

City Staff are working with the Region and Province to pursue a lifting of shale protection policies within the northwest Brampton urban boundary. As part of the planning for Heritage Heights, staff will refine the Natural Heritage System to work with the overall land use concept for the future community. In addition to potential harm to endangered and threatened species, enabling aggregate operations within the NHS could have adverse impacts on the overall development of the future community. A clearer understanding of what is intended through this proposed amendment is important. Is the Province looking to encourage quarries within the NHS or explore the viability of temporary resource recovery associated with adjacent development? The timeline for such activities would also be very important to understand as longer timelines would increase potential negative implications.

Housekeeping changes and changes for conformity with PPS 2020:

The City of Brampton supports most of the changes however, continues to have concerns with the changes to definitions relative to cultural heritage resources. The City urges the Province to re-evaluate these changes to the Growth Plan, as well as the PPS 2020.

- The changes to the definitions relative to cultural heritage can reduce the ability of municipalities to create local approaches to determining the significance of cultural heritage

resources. The City emphasises that local authorities are best placed to determine the cultural heritage value of sites given the diverse local contexts for each municipality. The revisions will likely negatively impact the City's ability in heritage conservation and protection of cultural heritage assets.

- The City of Brampton is supportive of proposed revised policies related to increased indigenous community engagement as part of the planning process, from 'encouraging' policies to requirements. The City requests the Province add wording to recognize existing Crown responsibilities relevant to Indigenous communities and that Provincial consultation guidelines be provided to ensure a common understanding of what constitutes meaningful engagement.
- The City supports the revised wording to "additional residential units" that stem from Bill 108 amendments to the Planning Act regarding municipalities preparing policies that authorise the use of additional residential units (the use of two residential units in a detached house, semi-detached house or rowhouse; and the use of a residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse). The City acknowledges that additional gentle density where feasible, in the form of additional residential units in accessory units can help alleviate affordable housing concerns in urban areas.

Land Needs Assessment Methodology

The City of Brampton supports a simplified approach to determine the amount of additional housing units and jobs required to meet market demand in conformity with the Plan.

- The new approach aims to ensure an appropriate mix of land including accommodating all housing market segments, consideration of market demands, and planning for all infrastructure services to support complete communities.
- The proposed Methodology will continue to be implemented through the Region of Peel Official Plan review that is subject to approval by the Minister of Municipal Affairs and Housing. Brampton will collaborate with the Region of Peel to understand the flexibility and determination of Brampton's allocation of the Schedule 3 growth in Peel.

Appendix 2: Summary Table of Proposed Key Policy Changes To The Growth Plan 2019

Section	Proposed Amendment	City of Brampton Comments
Throughout the document	Replacement of 'second units' in terms of housing options with 'additional residential units'	The City appreciates this change (it also confirms to the wording in PPS 2020). Brampton is facing an affordability crisis and through the ongoing preparation of a Housing Strategy, staff is creating policies that facilitate provision of additional gentle density where feasible, in the form of additional residential units in accessory units- in the form of backyard suites, laneway homes, etc.
Throughout the document	Replacement of PPS 2014 with PPS 2020; replacement of the planning horizon from 20 years to 25 years, and from upto 2041 to 2051; replacement of 'climate change impacts' with 'impacts of a changing climate'	The City has no comment
Where and How to Grow		
2.1	Updated GGH forecast: By 2051, this area is forecast to grow to, at a minimum, 14.9 million people and 7.0 million jobs.	The City has no comment
Managing Growth		
2.2.1.1	Addition in bold: Population and employment forecasts contained in Schedule 3 or such higher forecasts as established by the applicable upper- or single-tier municipality through its municipal comprehensive review will be used for planning and managing growth in the GGH to the horizon of this Plan in accordance with the policies in subsection 5.2.4.	The City will work towards developing growth forecast scenarios through collaboration with the Peel 2041 Growth Management policy work. Brampton will also need to re-evaluate the City's growth and planning initiatives such as Heritage Heights Secondary Plan area, various intensification nodes and precinct plans. A higher forecast could allow for higher than currently forecasted population and/or employment totals in Brampton, allowing for additional growth in select areas, which could also impact transportation and infrastructure planning.
Employment		
2.2.5.10	Addition in bold: Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would: a) satisfy the requirements of policy 2.2.5.9 a), d) and e); b) maintain a significant number of jobs on those lands through the establishment of development criteria; and c) not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4.	<p>City of Brampton supports this proposed change. The City is working with the Region of Peel on the MTSA delineation exercise. This proposed amendment will be helpful for areas such as the Bramalea GO, which is a large employment area in an MTSA, and where the City would like to encourage higher order uses including office and residential, but was unable to do so because it would require an MCR. The City has been in discussions with the Region, specifically for Bramalea as part of their MTSA study, and flexible policies are being looked at to allow for non-employment uses if the City undertakes a study that meets certain criteria (such as demonstrating that the number of jobs is maintained, or higher than what otherwise would be provided).</p> <p>There is a greater understanding that office campus style employment is no longer viable, and it is better to develop employment uses as part of a larger mixed use developments that create vibrant and complete communities, and this can be achieved through flexible policies. However, this proposed policy that would allow for easier conversion of the above mentioned employment lands could impact densities within employment areas and therefore their transportation and other infrastructure needs. Brampton will need to consider this in transportation and infrastructure planning endeavors.</p>
Housing		
2.2.6.1.d)	Addition in bold: Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will: d) address housing needs in accordance with provincial policy statements such as the Policy Statement: Service Manager Housing and Homelessness Plans; and e) implement policy 2.2.6.1 a), b), c) and d) through official plan policies and designations and zoning by-laws.	City of Brampton supports this proposed change. The PPS 2020 and the Region of Peel Housing and Homelessness Plan will guide the development of Brampton's Housing Strategy, Official Plan 2040 and lands needs assessment and allocation.
Mineral Aggregate Resources		

4.2.8.2	Deletion of 'habitat of endangered species and threatened species' from areas where new mineral aggregate operation and wayside pits and quarries will be prohibited.	The City of Brampton has concerns with the proposed changes. In addition to potential harm to endangered and threatened species, enabling aggregate operations within the NHS could have adverse impacts on the overall development of the future community. A clearer understanding of what is intended through this proposed amendment is important. The City of Brampton requests more clarity on the following: Is the Province looking to encourage quarries within the NHS or explore the viability of temporary resource recovery associated with adjacent development? The timeline for such activities would also be very important to understand as longer timelines would increase potential negative implications.
Coordination		
5.2.3.3, 5.2.3.4 and 5.2.3.7	Replacement of reference to First Nations and Metis communities with Indigenous communities; addition of a new policy 5.2.3.4: Municipalities shall engage Indigenous communities in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of these communities; and rewording 5.3.2.7 to: Planning authorities shall co-ordinate planning matters with Indigenous communities throughout the planning process.	City of Brampton supports these proposed changes from 'encouraging' policies to requirements. The City is developing a framework for indigenous engagement to provide for meaningful engagement. The City requests that wording be added to recognize existing Crown responsibilities relevant to Indigenous communities and that Provincial consultation guidelines be provided to ensure a common understanding of what constitutes meaningful engagement.
Growth Forecasts		
5.2.4.1	Addition in bold: All references to forecasted growth to the horizon of this Plan are references to the population and employment forecasts in Schedule 3 or such higher forecasts as established by the applicable upper- or single tier municipality through its municipal comprehensive review.	The City will work towards developing growth forecast scenarios through collaboration with the Peel 2041 Growth Management policy work. Brampton will also need to re-evaluate the City's growth and planning initiatives such as Heritage Heights Secondary Plan area, various intensification nodes and precinct plans. A higher forecast could allow for higher than currently forecasted population and/or employment totals in Brampton, allowing for additional growth in select areas, which could also impact transportation and infrastructure planning.
5.2.4.2	Addition in bold: All upper- and single-tier municipalities will, through a municipal comprehensive review, apply the forecasts in Schedule 3 or such higher forecasts as established by the applicable upper- or single tier municipality through its municipal comprehensive review for planning and managing growth to the horizon of this Plan.	As described above, the City will work towards developing growth forecast scenarios through collaboration with the Peel 2041 Growth Management policy work. Brampton will also need to re-evaluate the City's growth and planning initiatives such as Heritage Heights Secondary Plan area, various intensification nodes and precinct plans. A higher forecast could allow for higher than currently forecasted population and/or employment totals in Brampton, allowing for additional growth in select areas, which could also impact transportation and infrastructure planning.
Definitions		
Changed: Cultural Heritage Landscape	Modified to: A defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Indigenous community. The area may include features such as buildings, structures, spaces, views, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association. Cultural heritage landscapes may be properties that have been determined to have cultural heritage value or interest under the Ontario Heritage Act or have been included on federal and/or international registers, and/or protected through official plan, zoning by-law, or other land use planning mechanisms. (PPS, 2020)	The City understands this is a reflection of the changes to the same under the PPS 2020. However, the City expresses concern with the change as it can reduce the ability of municipalities to create local approaches to determining the significance of cultural heritage resources. The City emphasises that local authorities are best placed to determine the cultural heritage value of sites given the diverse local contexts for each municipality. The revisions will likely negatively impact the City's ability in heritage conservation and protection of cultural heritage assets. The City requests wording be included that 'cultural heritage landscapes may be properties that have been included on local and provincial registers too.'
Changed: Ecological Function	Modified to: The natural processes, products or services that living and non-living environments provide or perform within or between species, ecosystems and landscapes. These may include biological, physical and socio-economic interactions. (PPS, 2020).	The City has no comments
Changed:Habitat of Endangered Species and Threatened Species	Modified to: Habitat within the meaning of section 2 of the Endangered Species Act, 2007 (PPS, 2020)	The City has no comments

New: Impacts of a Changing Climate	The present and future consequences from changes in weather patterns at local and regional levels including extreme weather events and increased climate variability. (PPS, 2020)	The City has no comments
Changed: Public Service Facilities	Lands, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs, long term care services, and cultural services. Public service facilities do not include infrastructure. (PPS, 2020)	City of Brampton supports this clarification.