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Report

Planning, Design & Development Committee

Standing Committee of the Council
of the Corporation of the City of Brampton

PLANNING, DESIGN & DEVELOPMENT COMMITTEE

Date: March 9, 2007

File: PO4PA

DATE: April 2, 2007

Subject: *Places to Grow*, A Growth Plan for the Greater Golden Horseshoe
-A Strategic Overview and Workplan for the City of Brampton

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OVERVIEW:

- *Places to Grow*, A Growth Plan adopted under the *Places to Grow Act* (2005) came into effect in June, 2006 and requires affected municipalities to implement the plan in various ways; the primary means of implementation is the Official Plan, which is required to be updated within 3 years of the release of the Growth Plan, by June 15, 2009.
- Specific steps involved in implementing the Growth Plan are discussed in detail, including:
Provincial Obligations, Inventory and Analyses of Current Conditions, Development of Strategies, Policy and Strategy Implementation, Public and Education and Awareness Strategy, Development of Databases, Reports and Monitoring
- Implementation of the Growth Plan will require a significant amount of staff resources across the various City Departments to prepare and/or coordinate the undertaking of studies, review current land use policies and prepare implementing policies and programs. In addition, some consultant support will be required (approximately \$250,000.00/year over the next 3 years)
- Given that a number of Growth Plan requirements are measured across the upper tier (Regional) level, it is recommended that a number of initiatives be resourced through the Region of Peel.
- Implementation of the Growth Plan intensification and density targets has significant implications for the City as it relates to development approvals; to meet minimum density of 50 persons and

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jobs/hectare and 40% intensification target, the impact of each residential development application must be assessed; low density in one area will need to be compensated with higher density in other parts of the City

Recommendations:

1. **That** the report entitled "*Places to Grow, A Growth Plan for the Greater Golden Horseshoe-A Strategic Overview and Workplan for the City of Brampton*" dated February 12, 2007, be received.
2. **That** following the acceptance of this report by Council, that staff initiate the required work and studies in general accordance with the workplan attached and in consultation with the Region of Peel and Mississauga and Caledon, refine the work program such that the necessary coordination will be achieved to ensure Provincial targets are met at the Regional level, and report back to Council as appropriate.
3. **That** member(s) of Council be appointed to sit on a Corporate Steering Committee to oversee the implementation program for the Growth Plan, including at least one of the chair or vice-chair of Planning Design and Development Committee.
4. **That** the Region of Peel be requested to assume the responsibility to undertake those studies identified in Appendix 3 as Regional responsibilities.
5. **That** Council endorse the staff comments dated January 17, 2007 provided to the Province regarding the draft Technical Paper, in particular, the request to include lands in the vicinity of the Mt. Pleasant GO station within the built boundary given that it is appropriate to include its planned densities around this existing infrastructure as contribution toward the intensification target.
6. **That** the Region of Peel be requested not to assign responsibilities to the City of Mississauga pursuant to section 5.4.2.4 of the Growth Plan for the Greater Golden Horseshoe since the allocations and targets in the Growth Plan for the Greater Golden Horseshoe have not yet been met for the Region of Peel and such request would not be in conformity with the Growth Plan.
7. **That** staff be directed to incorporate discussion and recommendations respecting Growth Plan conformity in recommendation reports on planning matters given that all decisions must conform to the Growth Plan and that

decisions in one area may impact the ability of other parts of the community to meet the overall Growth Plan targets.

8. **That** this Report be provided to the Region of Peel, Mississauga, Caledon, and the Province.

Background:

On June 15, 2006, following years of study and consultation, first under the Smart Growth initiative/task force, the Province approved the Growth Plan for the Greater Golden Horseshoe, the first of its kind adopted under the Places to Grow Act, 2005. The Greater Golden Horseshoe includes the Greater Toronto Area as well as Hamilton and Waterloo Region, as shown in Appendix 1. Since the initial release of discussion papers and a draft for comment, staff have kept Council abreast of the initiative, and particularly, its impacts on our community. It is not the intent of this report to provide detailed explanations of the Growth Plan policies as much of this has been done previously, but rather to offer a more strategic look at achieving compliance with the legislation, highlighting implications from the perspective of strategic directions, processes, roles and resources.

The policies of the Growth Plan are grounded in 4 key principles:

- Building compact, vibrant and complete communities (Urban Form)
- Supporting a strong and competitive economy (Economy)
- Protecting natural resources (Natural Resources)
- Optimizing infrastructure to support growth (Infrastructure)

Two additional principles speak to the way in which the main principles are applied:

- Recognize the diversity of communities
- Promote collaboration among all sectors and stakeholders

All of these principles are inter-related and work together toward the vision behind Places to Grow, creating communities that are vibrant, healthy and prosperous.

In a broad sense, many of the Growth Plan goals and principles are already embodied in the City of Brampton's vision- articulated in our Strategic Plan and the recent Council adopted City of Brampton Official Plan. This, not only because these base principles are the foundation for good planning that has been the practice of planners for years, but also because staff have been engaged from the early discussion on the Smart Growth initiative, provided feedback to the Province on early drafts and kept abreast of the Growth Plan directions.

Current Situation:

Following the adoption of the Growth Plan under the Places to Grow Act, this report takes a strategic look at the broad Growth Plan policies, provides a high level overview of where we stand relative to meeting the main objectives, and identifies the main strategic directions that will be required to conform to the Growth Plan including an initial assessment of resource implications. The discussion is organized around the following headings:

The City's Obligations for Growth Plan Conformity
Status of North West Brampton under the Growth Plan
Key Urban Form Directions in the Growth Plan
Growth Plan Delegation Clause
Implementing the Growth Plan –A Staged Workplan
Resources and Funding

The City's Obligations for Growth Plan Conformity

It is essential to understand the legal obligations under the Growth Plan and Places to Grow Act (2005). The Places to Grow Act requires that all decisions on matters, proceedings, or applications made under the Planning Act and the Condominium Act must conform to the Growth Plan, subject to any applicable regulations, including transition regulations which address the disposition of applications in process when the Growth Plan was adopted. This necessitates deliberate determination of Growth Plan conformity for every decision made under the Planning and Condominium Acts.

The Growth Plan Act requires that all municipalities affected by the Growth Plan shall amend their respective Official Plans within 3 years of the Growth Plan coming into effect (by June 16, 2009). Notwithstanding that the recently Council adopted Official Plan for the City (not finally approved) incorporates many of the principles, it does not fully implement the Growth Plan, since the work was undertaken prior to the adoption of the Growth Plan and the studies and assessments which are needed to inform the majority of the required changes have not been undertaken. As such, a conformity amendment to the Official Plan will be required to implement the Growth Plan.

While the City's Official Plan will be the primary tool for articulating many of the Growth Plan objectives, other planning documents which guide development at a more area specific level will also require review and potential revisions, including the City's Secondary Plans, Block Plans and Zoning By-law.

Until the Growth Plan is fully implemented in the Official Plan and other planning and policy documents, it is essential that each application be considered not only

for compliance with the Growth Plan itself, but with respect to the impact of such development on the City's ability to achieve overall conformity both at the City and Regional level. For example, while Council often receives requests from neighbours to reduce the density of proposed developments or plans of subdivision, any reduction from planned densities, especially prior to the City-wide review of our current planned densities relative to the growth plan targets will result in the need to compensate such loss in density (capacity to accommodate population) by increasing densities in other parts of the City.

The broad and comprehensive scope of the Growth Plan policies necessitates an equally broad view of the range of tools and tactics available for achieving the objectives. The Growth Plan includes policies not only on land use, but also on conservation practices, employment strategies, the preservation of natural and agricultural areas, and key infrastructure such as transit and transportation and water and waste water systems. Accordingly, a broad range of City policies, guidelines, strategies and documents will need to be considered as they impact the achievement of the Growth Plan directions. Among those that will need to be considered are the City's Transit and Transportation Master Plan (TTMP), the Pathways Master Plan, Area Transportation Master Plans, Community Improvement Plans, Growth Management Objectives and Guidelines, employment land strategies, cost-sharing and sole source funding policies and agreements, watershed plans and Urban Design Guidelines, to name a few.

It is clear that given the broad scope of the Growth Plan policies, that its implementation will need to be done through the collaborative involvement of a cross section of City staff. It is intended that Planning staff will establish inter-departmental project teams to review current policies and practices against the growth plan policies, and where required, develop new strategies, practices and performance measurement tools to ensure proper management of growth in accordance with the Growth Plan targets, on an ongoing basis. Planning staff will be arranging meetings with representatives from the other City Departments in the near future to initiate the project teams.

Status of North West Brampton under the Growth Plan

One of the most stringent policy areas in both the Provincial Policy Statement and the Growth Plan governs the amount and timing of expansions to urban settlement boundaries, ensuring that growth be first directed to existing built areas to the extent that they can accommodate new growth. Although OPA 93-245 and ROPA 15 (recently approved by the OMB) have the effect of expanding settlement area (urban) boundaries in Northwest Brampton, a regulation dealing with the disposition of planning applications in progress when the Plan came into effect accompanied the Growth Plan. Ontario Regulation 311/06 (Transitional Matters-Growth Plan for the Greater Golden Horseshoe) provides that the Growth Plan would apply to the North West Brampton Amendment except for the more rigorous requirements for justifying settlement area expansion. With

Northwest Brampton within the urban boundary, all of Brampton's lands are designated urban and no further urban boundary expansions will be required to accommodate urban development to the City limits. This is an important and significant accomplishment by the City to enable the continued accommodation and planning for our growth.

Key Urban Form Directions in the Growth Plan

The Growth Plan articulates a number of elements of urban form that work toward the principle of achieving *compact, vibrant and complete communities*.

These include:

1. Vibrant Downtown (Urban Growth Centre)
2. Increased intensification
3. Transit-supportive Greenfield development

1. Urban Growth Centres: 200 persons and jobs per hectare

The plan envisages a strong **central area** (Urban Growth Centre), which serves as a focus area for investment, offers a broad range of commercial, residential, recreational, cultural, and entertainment uses, supports major transit infrastructure and accommodates a significant share of population and employment growth.

The City has already taken positive steps toward articulating a similar vision, in adopting the Central Area Vision as the key framework for the form of growth in the downtown. Municipal investment in the downtown such as that provided for the construction of the Rose Theatre will act as a catalyst to private investment and contribute to establishing a vibrant downtown. Staff will continue to work with the Downtown Development Corporation to plan for a vibrant downtown. The review of the Community Improvement Program is also a positive step toward identifying appropriate incentives which are aimed at equalizing the attractiveness of reurbanization and greenfield development by reducing some of the costs of development within the prescribed CIP area.

One of the significant policies of the Growth Plan policies for downtowns is the minimum densities around which municipalities must plan. The minimum density for which mid sized cities such as Brampton need to plan is 200 persons and jobs /hectare. This is seen as a potential challenge for Brampton for a couple of reasons. The historic built form of downtown Brampton is relatively low rise although planning policies and zoning have permitted very high densities. The City is encouraged by the submission of a number of applications for high density residential apartment developments in the Central Area within the past year, totaling about 1200 units. However, achieving a built form which respects the Downtown Vision and achieves the minimum overall density of 200 persons per hectare (gross) over the entire Urban Growth Centre will depend on increased

private sector interest in intensification and reurbanization within the central area fueled by a market demand for different forms of housing close to downtown shops and services. There has been a decline in housing starts recently across the Greater Golden Horseshoe due largely to a reduced demand for single detached dwellings. This is largely attributed to increased land costs driving up the cost of housing. The increase in residential redevelopment applications in the Central Area provides optimism that the City of Brampton is on the right track with its review of the incentives provided through the CIP program.

The second reason this may be seen to be a challenge is that a large part of the City's downtown is located within the regulatory floodline of the Etobicoke Creek and recognized as a Special Policy Area under the Provincial Policy Statement, which has much more restrictive policies regarding intensification and redevelopment than Places to Grow policies. The Places to Grow Act provides that in the event of a conflict between the Growth Plan and another Provincial policy, in a matter of safety, the more restrictive shall apply. A resolution to this situation in Brampton is required as part of the process of moving ahead with the conformity exercise. In addition, many of the stable lowdensity residential portions of Downtown Brampton are not intended to be redeveloped or intensified.

2. Intensification: 40% of new units within the Built Boundary

In addition to directing growth at higher densities to urban growth centres, the plan also supports **intensification** in general, as a principle, along with requiring higher combined population and employment densities along intensification corridors, around major transit station corridors, on redevelopment sites and through expansion or conversion of existing buildings.

The new Official Plan provides for intensification corridors anchored by transit supportive nodes to supplement the Central Area. More detailed intensification policies will be added as part of the required amendments to the Official Plan.

Achieving the intensification objectives, and specifically the Intensification Target- which requires that 40% of new residential units be located within the built up area by 2015- will require a diversification in the location and type of residential development. Because of Brampton's proximity to Toronto which receives significant immigration and the City's availability of greenfield land, the demand for housing to accommodate significant population growth in Brampton has historically been for single detached dwellings. Increasing the proportion of new housing toward the built-up area means developing strategic initiatives and tools to encourage and provide for infill development and redevelopment for townhouses, apartments, other forms of multiple dwellings and within mixed use buildings

3. Greenfield Development: 50 persons and jobs/hectare

Outside of the built up area, in presently vacant, **greenfield** neighbourhoods, the Plan describes the need for “complete” communities—those that are well designed, offer transportation choices (transit, roads, walking, cycling), accommodate people at all stages of life, have the right mix and density of housing and jobs to support the use of transit and have convenient access to stores and services.

Brampton's greenfield development is well guided by the Secondary Plans, Block Plans and subdivision planning which work together to ensure a mix of housing types, sufficient stores and services, an open space network for recreation, walking and cycling and timely provision of schools, roads and other infrastructure. Since 2004, the City's Growth Management Program has worked to ensure that communities are developed in a way that ensures the infrastructure and community amenities are provided in a timely fashion and with limited impact on the general tax base. Staff will continue to work with the school boards to ensure the timely provision of schools.

The Growth Plan requires that all Greenfield development across the region meet a minimum density of 50 persons and employees combined per hectare, which is the minimum required to support a reasonably frequent level of transit service.

It is important to emphasize that although the greenfield density target is measured at a regional level, every planning approval for individual plans of subdivision, for example, impacts our ability to meet the density target overall. Because the land area of those plans of subdivision going through the approval process now will be part of the total greenfield land area, any plans which are approved now with less than 50 persons and jobs/hectare necessitate higher compensating densities on the remaining lands to achieve a minimum of 50 persons and jobs/hectare overall. While the Growth Plan does not necessitate that each application meet the minimum density target, it does require overall growth plan conformity. As such, specific comments on individual applications relative to meeting the Growth Plan policies will now be included in planning reports to highlight the compliance with the Growth Plan and the potential implications for future compliance on other lands.

Growth Plan Policies on Infrastructure

The Growth Plan policies on infrastructure are aimed at optimizing infrastructure investments to support the planned growth. It aims to make more efficient use of existing infrastructure but also recognizes that the Province and municipalities are challenged with insufficient and aging infrastructure to adequately meet the needs of the projected population growth.

Accordingly, in order to accommodate the level of intensification that the policies require, detailed studies are required to inventory the capacity of the existing water and waste water systems, transportation and transit network. The results of this study will go hand in hand with the planning for more intense land uses in appropriate locations.

The Growth Plan identifies proposed improvements to the moving of both goods and people. For this region, there are a number of Provincial road networks or network expansions under study, including the Highway 427 EA, assessing its northerly extension, the construction of the extension of Highway 410 and the GTA West corridor, shown conceptually in the Growth Plan. The Growth Plan provides the context and vehicle for ensuring the Province continues to make progress on the long-standing projects such as the 427 EA, given that there is a direct relationship between the provision of essential infrastructure and the ability to accommodate the prescribed growth.

Growth Plan Delegation Clause

As Council is aware, the final Growth Plan includes Clause 5.4.2.4 which allows an upper tier municipality to delegate some or all of certain responsibilities under the growth plan to a lower tier municipality that has 50% or more of the Regions population as follows:

*"...if at the time this Plan comes into effect a lower tier municipality's population is greater than 50 percent of the population of the upper-tier municipality, the upper-tier municipality may assign some or all of its responsibilities pursuant to the policies of this Plan to the applicable lower-tier municipality, **provided that the applicable allocations and targets are met at the regional or county level.**"*

The addition of the new delegation clause was highlighted in staff's report to Council in October, 2006, as it related to the report on the Regional Planning responsibilities.

In January, 2007, Mississauga Council considered a staff report entitled "Delegation of Planning Responsibilities by the Region of Peel-Pursuant to the Growth Plan for the Greater Golden Horseshoe" requesting that Regional Council enact a By-law to delegate to the City of Mississauga the planning responsibilities; pursuant to this section of the Growth Plan:

- Allocation of growth forecasts
- Identification of intensification targets
- Identification of Greenfield density targets
- Provision of policy direction on matters that cross municipal boundaries.

At the Region of Peel Council General Committee Meeting on March 1, 2007, Mississauga's request for delegation of responsibilities under the Provincial Growth Plan was deferred to Planning Committee and has not yet been formally considered.

Notwithstanding the fact that the Growth Plan ultimately enables delegation of responsibilities to Mississauga, this request has major implications for Brampton at this time; including:

- the enabling policy in the Growth Plan provides for delegation *provided that the applicable allocations and targets are "met" at the regional level*. We have only commenced the exercise of the population allocations and targets and nothing has been even proposed to our respective councils, let alone approved or "met" as per the policy;
- there is an amount of unallocated regional population as per the Growth Plan forecasts, that if left allocated to the City by default of any delegated Mississauga decision, may impose significant intensification related issues for Brampton to resolve. Again, the work is only now being done and the Province has not yet even established a "Built Boundary" for Peel Region which would be required to begin to determine the implications;
- there are a host of ill-defined issues related to the area of "cross-municipal planning matters" that must be fully assessed prior to any delegation of responsibilities.

Therefore, it is premature to consider any delegation of responsibilities at this time until it is demonstrated that the Growth Plan targets are met at the Regional level and the implications and scope of the delegation is further defined.

Implementing the Growth Plan –A Staged Workplan

The Growth Plan assigns 1.64 million residents and 780,000 employees to the Region of Peel by 2031 and requires that plans be developed to achieve the population allocation. It has already been noted that before planning and other policies may be written to guide and manage the assigned population and employment growth, that we must first understand our capacity to accommodate the growth to meeting the Growth Plan population and employment forecasts, to 2031. This necessitates preparing a number of inventories, assessing and analyzing our current practices, developing the targets and then developing the strategies to achieve the targets.

The key steps involved in implementing the Growth Plan can be summarized as follows:

- I Provincial Obligations
- II Inventory and Analyses of Current Conditions
- III Development of Strategies

- IV Policy and Strategy Implementation
- V Public Education and Awareness Strategy
- VI Development of Databases, Reports and Monitoring

The detailed elements within each of the six functional areas, along with the estimated projected timeframes are shown on the attached Appendix 2.

I Provincial Obligations

The Ministry of Public Infrastructure Renewal will work with municipalities to define two of the main elements of the growth framework, which are required before significant work can commence, as they are key to defining other terms in the urban form. First, the built boundary, the line between existing development and vacant, greenfield land; staff have undertaken some work toward a draft built boundary line and initial discussions have taken place with regional staff however, no formal determination of the line has occurred. The Ministry of Public Infrastructure renewal has just released a Technical Paper on a Proposed Methodology for Developing a Built boundary for the Greater golden Horseshoe seeking comments on the definition of draft built boundary boundaries prepared to date and on next steps to refine the boundary. The Ministry of Public Infrastructure Renewal invited GGH municipal staff to attend a technical briefing on the methodology behind defining the built boundary, at the end of November. It is this line which is used for measuring and monitoring the intensification target (40% of residential development inside the built boundary by 2015). Detailed comments on the draft **built boundary** released by the Ministry and the proposed methodology for its finalization are provided below.

City Comments on the Technical Paper on Defining the Built Boundary

The Growth Plan defines the built boundary as the “limits of the developed urban area as defined by the Ministry of Public Infrastructure Renewal (PIR) in accordance with Policy 2.2.3.5”. In November 2006, PIR released its technical paper outlining its approach to defining the built boundary for all affected municipalities within the Growth Plan, and seeking feedback on this approach and the suggested next steps for its refinement. Comments were due back to the Province by January 19, so staff level comments were provided in a letter to the Province, attached as Appendix 5, in order to meet the deadline, and will be followed by a Council resolution arising from consideration of this report.

The identification of the built boundary is an important element which will be used for implementing and monitoring the intensification objectives of the Growth Plan. The line, once established, will be a precise and fixed line which is not intended to change as growth occurs. All lands located “outside” of the built boundary and within a settlement area will become designated greenfield lands. The definition of the built boundary is a necessary step before further work on land inventories

and analyses can occur. Appendix 6 shows the conceptual definition of the terms related to the built boundary.

The Technical Paper describes in depth, the use of two primary datasets to create a draft built boundary for all affected municipalities. The Tax Roll 2006 MPAC (Municipal Property Association Corporation) data is primarily used to ascertain the use of land (commercial, industrial, residential, farm, multi-residential, vacant) which was ultimately classified as built or unbuilt. MPAC administers the province-wide property tax system. The Ontario Parcel Alliance (OPA) data, which is jointly maintained by Teranet Enterprises Inc., MPAC and the Ministry of Natural Resources includes parcel boundaries, assessment roll numbers and property identification numbers, where appropriate. Through the joining of these two primary datasets, followed by the use of grid overlays 250 metres by 250 metres, and a number of steps which aggregated and grouped the results on a grid level basis, a preliminary built boundary was developed for each upper and single tier municipality within the GGH. The general aim of this exercise was to develop a relatively contiguous built boundary with limited disconnected "islands". The built boundary maps prepared to this point are included in the Technical Paper at a very large scale which does not enable close examination of the resulting product.

The Technical Paper proposes a series of refinement steps to be undertaken with the assistance of municipalities which would create a built boundary that is intuitive and can be identified on the ground by aligning with recognizable topographic and parcel geography.

Staff have reviewed the methodology undertaken to date and the proposed refinement steps and offer comments on the following matters:

- The way in which "holes in the built-up area" are treated (Step vi)

The paper proposes that only those "holes" that are less than 62,500 square metres (the area of the 250 metre X 250 metre grid) may be identified as built. Staff believe that given that this is an arbitrary size, that areas larger than this, especially those that are designated for more intense or mixed use development should also be assigned a "built" designation so that once developed, such development may be counted toward the intensification target.

- The treatment of vacant lands in the vicinity of a Major Transit Station Area

Vacant lands within at least 500 metres of the City's Mt. Pleasant GO station, which would be considered as as Major Transit Station Area defined in the Growth Plan ("the area including and around any existing or planned higher order transit station within a settlement area;"..."or a

major bus depot"...within an approximate 500 metre radius of a transit station...") should be designated as falling within the Built Boundary where such lands are contiguous to an existing built up area. This would recognize the extensive planning underway for the Mt. Pleasant area of Northwest Brampton which anticipates the development of a mixed use, transit oriented community with sufficient densities to support higher order transit service, including both the GO service and frequent, convenient, rapid bus service, which would meet the land use, intensification and transportation visions of the Growth Plan. Development in the area of the Major Transit Station will add a significant number of new residential units while making use of existing transit infrastructure-as opposed to completely new infrastructure as would be the case in greenfield developments. Staff suggest that unless the area is identified within the Built Boundary, the achievement of the intensification goals, particularly the intensification target will be compromised.

- The difficulty in assessing the implications of the rules in the absence of the opportunity to receive and review mapping a smaller scale which would more clearly demonstrate the results of the rules for our municipality

PIR staff met with Peel municipalities to review the proposed built boundary developed to date on February 5, following the January 19 deadline for comments. The implications of the refinement rules described in the Technical Paper became more clear once detailed mapping was reviewed. In the written submission, staff asked that the Ministry accept additional comments following the January 19 deadline in recognition of the timing of review of the PIR mapping of the preliminary built boundary.

- The use of MPAC data for ongoing monitoring

The Technical Paper acknowledges that although recognized as the only dataset which tracks residential units continuously across all GGH municipalities, the MPAC data is often out of date and inaccurate. The methodology attempts to overcome issues with multiple uses on one property however, if this data is to be used for ongoing monitoring, attention should be paid to precisely how the dataset should be maintained to provide the greatest of integrity for future monitoring. PIR should commit to initiating an overhaul of the system to ensure this happens.

- Timelines and Process to Finalize the Built Boundary

Staff are concerned that since the Province is still at least several months away from finally establishing the built boundary, and given that this is a building block to proceeding with several of the studies and strategies, the amount of time available to finalize the implementation through Official Plan policies is further being reduced. There is a considerable amount of work ahead of us to achieve the June, 2009 deadline for Official Plan conformity amendments.

I Provincial Obligations (cont'd)

The other boundary to be determined together with the Ministry of Public Infrastructure Renewal is the Urban Growth Centre, the boundary around those central area lands within which the greatest growth should occur. Planning and Design staff are having some initial discussion on the merits of various definitions of this line, however, as previously raised, this also requires resolution of the floodplain policy conflict.

Certain of the Growth Plan objectives need to be viewed and evaluated over a broader area, at a regional and sometimes inter-regional level. The Growth Plan requires that the Minister of Public Infrastructure Renewal work with other Ministers of the Crown, Municipalities and other stakeholders on **sub-area assessments** at a regional scale, which will focus on:

- a regional economic analysis and provincially significant employment areas
- further evaluating the transportation network
- implications of projected growth for water and wastewater servicing
- identifying natural systems
- identifying prime agricultural land
- identifying mineral aggregate resources

No specific timelines or additional information has been provided on the scope or timing of the sub-area assessments. Nevertheless, Provincial staff have advised municipalities to begin Growth Plan compliance now, starting on the other Growth Plan requirements.

II Inventory, Analysis and Implications of Current Conditions

This is a critical phase which entails inventories and analyses which are aimed at documenting the City's current land supply, measuring current and planned densities and most importantly, analyzing our ability to intensify and accommodate significant growth. This capacity and constraint analysis will require identifying suitable areas for intensification as well as measuring the capacity and constraints of all of our hard and soft services to accommodate the growth, including engineering services, transportation networks, transit,

emergency services, and community infrastructure such as parks and open space.

Given the need to measure and monitor the greenfield densities and intensification target and employment to population ratios over a regional basis, staff are strongly advocating that the Region of Peel would be the lead agency to coordinate, contract and fund the undertaking of and consultant support for inter-municipal coordination of this phase of work across the Region. Undertaking this phase of work will require extensive and detailed data collection and analysis by area municipal and Regional staff using a number of GIS databases and capabilities.

The City's review of current built and planned densities is a database which Planning staff prepared with the assistance of GIS in 2004 and which is intended to be updated on an annual basis. The original findings are in the process of being updated for presentation to Council in 2007. This will provide a good indication of the current mix of land use types and dwelling density and is intended to be updated to add population and employment densities to inform any required changes to our secondary planning categories and densities.

It is expected that an Intensification Study will be one of the primary studies which will be undertaken, which will result in an inventory of land suitable for all types of intensification including vacant sites and underutilized sites, together with the delineation of suitable boundaries for the Urban Growth Centre and intensification corridors. During this time, the City will monitor intensification activity and applications to determine if there is a need to review existing, zoned sites, particularly those for high density residential, in more detail and more quickly. The intensification capacity review will form much of the basis for the next phase- population allocation. This capacity review must be undertaken by each area municipality in order to allow an informed process and analysis within each municipality and may result in revisions to the Official Plan and Secondary Plans in Brampton.

Each of Brampton, Mississauga and Caledon is responsible for absorbing a portion of the projected growth to meet the Growth Plan control totals. At this point, based on current area municipal population projections, there is an unassigned population of 30,000 persons across the region based on the most up to date projections available, which must be resolved through this Growth Plan conformity process. The assignment of the new population and employment is described in the next phase (III-Development of Strategies).

The Review and Assessment of Infrastructure capacity is also a significant piece of work that will entail an inventory and analysis of a number of hard and soft services and an evaluation of the projected growth against service level targets. It is anticipated that the Region would undertake the sewer and water capacity

study given their role in providing these services across the region-the role of coordinating and funding this study should be assumed by the Region.

A review of the more local infrastructure, including the City's TTMP, cycling master plan, fire services and recreation, parks and open space plans will require a consultant study as well as the involvement of transit, community services and other staff.

III Development of Strategies

This stage is the one in which the most strategic work will be undertaken, building on the findings of the first two inventory and analysis stages by developing an intensification target strategy (40% within the built boundary by 2015) and greenfield density strategy, both to be measured and applied over the whole Region and assigning population and employment growth to all Small Geographic Units (SGU's) across the Region. This phase of work will require the hiring of an expert demographic consultant and updates to the forecasts based on the intended strategies for achieving the intensification and density goals and building on the (yet to be released) 2005 Census population data. Given that this must be done across the Region to develop a Regional population distribution which meets the Regional population and employment requirements of the Growth Plan, it is recommended that this study be funded by the Region and managed by the regional and area Municipal Planning staff group. This phase will most likely start in 2007 and extend into 2008.

IV Policy and Strategy Implementation

This is the phase during which the bulk of the implementation will take place through review and revisions to various planning documents, policies and guidelines. As indicated earlier, the primary implementation document is the City's Official Plan but as was noted earlier and as can be seen in the attached workplan, there are a number of documents across the Corporation that could be modified as a result of this conformity exercise. While only the revisions to the Official Plan are legislated under the 3 year time period, to the extent possible, it is proposed that all related policies be revised as required or at least have required revisions identified for 2009.

V Public Education and Awareness

To begin to achieve the Places to Grow principles, it is clear that throughout the 3 year time period of the conformity work program and beyond, that strategies to engage the public and various stakeholders, through publications, workshops and interactions between the public and planning staff are essential, to educate the public and raise awareness of the new principles and legislated requirement of planning in the Greater Golden Horseshoe. Of these founding principles, the emphasis on the reliance on transit, walking and cycling and realizing the vision

of reducing the use of personal automobile is perhaps one of the greatest challenges. While citizens are supportive of efforts to improve air quality and are frustrated with traffic congestion, there is not a common understanding and appreciation that continuing down our current path of outward expansion at very low densities results in increasing demands for additional road capacity, adding to air quality issues and greater infrastructure costs.

Another principle that requires more understanding and consideration is the need for intensification in key areas, to accommodate the significant growth without continued outward expansion, and to make transit service viable. It is important to develop an understanding of the various means of achieving intensification and that that Growth Plan does not envisage high density development as the preferred use of land. Rather, it describes a number of ways that intensification can occur, through ensuring the redevelopment of sites that are suitable for redevelopment, building on vacant or underdeveloped sites, ensuring a mixture of lot sizes and housing types, and providing for mixed use development at medium densities along corridors and in the central area where roads and other infrastructure can best accommodate additional development. By maximizing the existing capacity in our infrastructure, both capital and operating costs can be minimized.

To meet the needs for community education and awareness, money is proposed to be budgeted for each of the next three years, starting with \$50,000 in 2007.

VI Databases and Monitoring Reports

The City's Growth Management Program itself relies heavily upon the development of some more sophisticated, integrated data management systems, primarily GIS. With the new performance-based growth requirements in the Growth Plan, primarily around the proportion of new residential development located inside or outside the built boundary, together with the minimum density requirements in the Urban Growth Centre and greenfields, it is becoming more important to develop and maintain detailed, accurate and dynamically updated databases in GIS.

Critical to the success of this function is getting the City's development tracking system operational, having historic data entered, recording information about new development applications and tracking their status and progress on an ongoing basis. This will enable data to be continuously current and allow reports to be run at any time. Also essential to achieving the information required for this program is the integration of building permit data in AMANDA with the City's GIS system; work has begun on this. It is clear that additional resource demand on the technical staff in Planning and GIS is anticipated, to ensure the integrated functioning of all of the systems on which the provision of accurate and current information rely.

Resources and Funding

Implementation of the Growth Plan will require a significant amount of staff time and resources in both Planning and in other City Departments. Because of the broad range of functions and services impacted by the Growth Plan-planning, transit, transportation, parks, urban design, watershed planning, conservation initiatives, economic development, infrastructure and more, undertaking the Growth Plan conformity will involve a number of staff throughout the Corporation, under the project management of the Growth Management section in Planning. Following Council's receipt of this report, a Project Charter will be developed and a Steering Committee set up comprised of representatives from affected departments which will contain the mandate of the team and identify the terms for inter-departmental project teams responsible for the various elements of the review and implementation. This report recommends that Council assign representatives to sit on the Steering Committee.

In terms of coordinating the implementation of a number of the elements of the Growth Plan across the Region of Peel, it is logical that the Region should assume a coordinating role for certain aspects of the implementation-those which involve elements and targets in the Growth Plan that are to be measured and monitored over the entire Region or are the sole responsibility of the Region. Brampton staff reviewed the workplan attached as Appendices 2 and 3 at the January 31 Technical Advisory Committee meeting, comprised of area municipal and regional staff, together with the work programs of Peel Region and other area municipalities. This collaborative approach to the implementation was recently discussed in the context of the Planning Responsibility Matrix developed to address planning responsibilities at the Region of Peel, and identified as the primary responsibility of the inter-municipal planning group in such matrix.

Appendix 3 contains a summary of projected costs associated with the undertaking of background studies and analyses required to undertake the Places to Grow conformity exercise. This shows a projected cost to the City of just over \$250,000 for 2007 and an estimated total cost of \$715,000 over 3 years. These requirements have been discussed at the Corporate Budget discussions. It also identifies those elements which could potentially be funded from the Regional budget, in the order of \$610,000.00.

The following studies are identified as likely to be required:

1. Greenfield Land Inventory
2. Employment Land Inventory and Analysis
3. Review of Built Densities and Planning Densities
4. Inventory and Assessment of Intensification Opportunities
5. Review and Assessment of Existing Infrastructure and Future Capacity
6. Financial and Municipal Management Implications
7. Allocation of Population and Employment Across Region

8. Public Awareness Strategy

In addition to costs associated with consultant studies, implementation will entail costs associated with both staffing in various departments, as well as capital costs to develop GIS and other data maintenance systems. It is difficult to identify a total cost related to staffing impacts until the interdepartmental resource teams are identified and more detailed work programs in each area are developed.

One of the most significant areas of demand will be on the acceleration and enhancement of the City's GIS and other Corporate data management systems. The City's Growth Management program already relies on the continuous gathering, monitoring and analyses of development related data, geographically linked. The importance and urgency of developing our Development Tracking Application (DTA) System, AMANDA, and corporate GIS databases in an integrated fashion is accelerated by the requirements of the Growth Plan. Growth Management staff are working with IT staff to ensure the DTA system is set up to maximize its value for the maintenance and ongoing monitoring of development data, such as numbers and locations of units of all types (inside or outside the built boundary), density and population by Secondary Plan area (meeting the minimum Greenfield density target) to name a few of the most important datasets. The linking of the building permit information from AMANDA to the Corporate GIS is an essential element, facilitating the continuous updating of building activity, spatially displayed. The success of developing a system that will not only allow planning staff to gather essential development data for analyses during the conformity stage but also have efficient access to dynamically updated data for monitoring purposes will rely heavily on the integration of the various systems.

Related also to this success is effectively resourcing of the staffing areas undertaking this work with planning. The DTA system is still in its development and testing stage and will require a large amount of staff time to populate with application data, and troubleshoot the system and develop required reports. Additionally, the City's conversion to Geomedia is in its relative early stages and staff time is still being spent bringing Microstation and Autocadd files into Geomedia and developing essential corporate data layers along with maintenance programs-all in addition to creating mapping work related to a large volume of development applications. The work required for Places to Grow will place an increased demand on technical staff in Planning as well as Corporate IT.

The Growth Plan requires that the achievement of the various density targets be monitored so it is essential that the effective data management systems and sufficient staff resources are in place to gather, store, maintain, manipulate and report on the data on an ongoing basis.

Summary of Implications for the City of Brampton

Ensuring that all policies and practices at the City are in full alignment with Places to Grow is a significant and complex undertaking. In terms of implications for the City, they can be summarized as:

- Requiring significant staff resources in Planning and across a number of Departments, with particular staff resource needs identified in IT
- Requiring that development proposals are monitored and evaluated on an ongoing basis to recognize the long term implications of density decisions/approvals on meeting the Places to Grow targets
- Requiring a collaborative effort with the Region and area municipalities
- Requiring significant capital and operating expenses to fund certain required studies, staffing needs, and to create and implement any necessary system improvements to manage the data



Adrian Smith, MCIP, RPP
Director, Planning and Land
Development Services

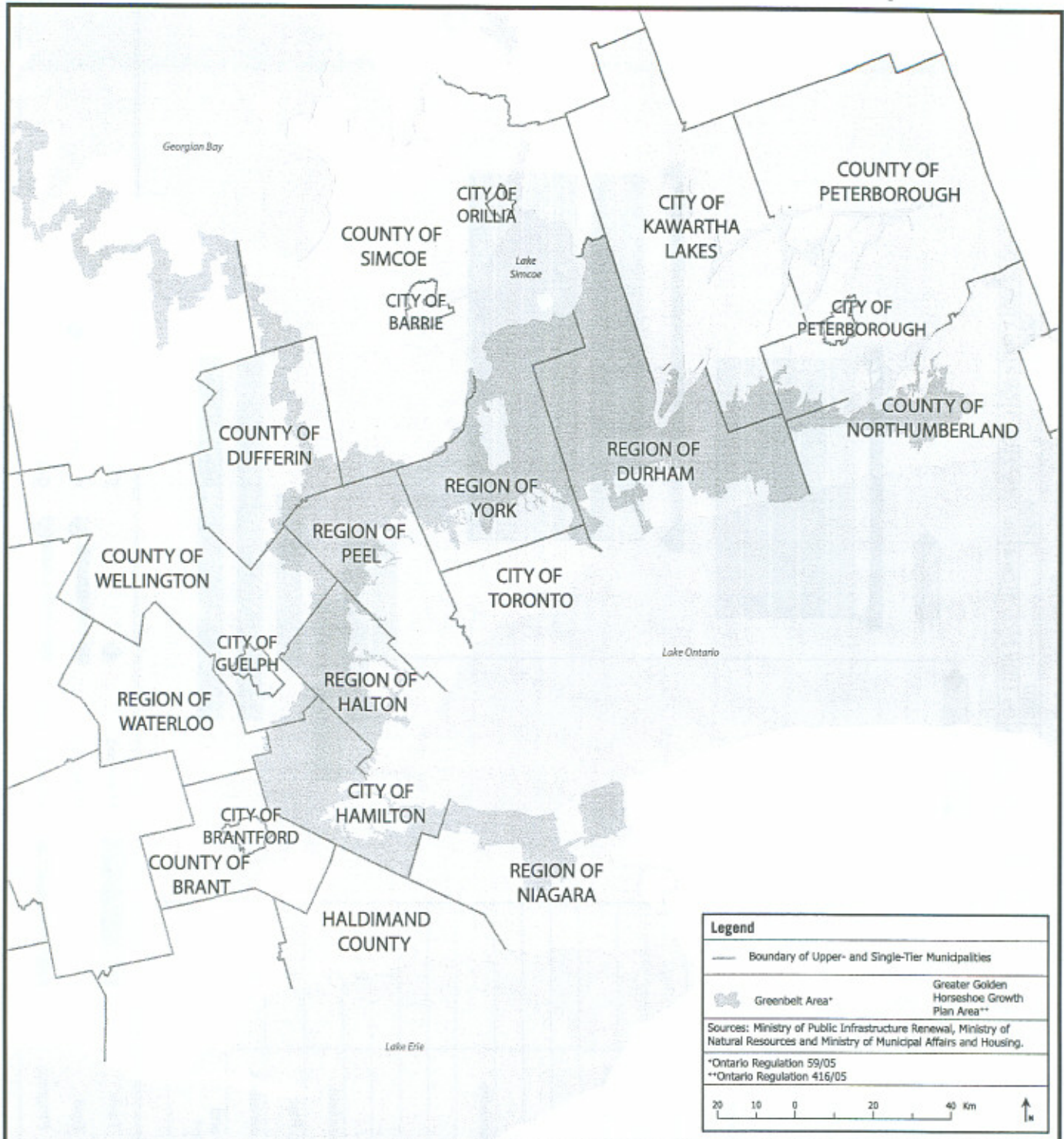


John Corbett, MCIP, RPP
Commissioner,
Planning, Design and Development

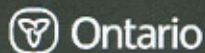
Authored by: Janice Given, Manager, Growth Management and Special Policy

Appendices

1. Map Showing the Greater Golden Horseshoe
2. Places to Grow Overall Workplan-City of Brampton
3. Places to Grow Conformity-Summary of Required Studies
4. Comments to PIR on the Technical Paper on Proposed Methodology for Developing a Built Boundary for the Greater Golden Horseshoe
5. Conceptual Drawing of the Built Boundary



Legend	
	Boundary of Upper- and Single-Tier Municipalities
	Greenbelt Area*
	Greater Golden Horseshoe Growth Plan Area**
Sources: Ministry of Public Infrastructure Renewal, Ministry of Natural Resources and Ministry of Municipal Affairs and Housing.	
*Ontario Regulation 59/05	
**Ontario Regulation 416/05	



SCHEDULE 1

Greater Golden Horseshoe Growth Plan Area

PLACES TO GROW
 GROWTH PLAN FOR
 THE GREATER GOLDEN HORSESHOE 2006

Note: The information displayed on this map is not to scale, does not accurately reflect approved land-use and planning boundaries, and may be out of date. For more information on precise boundaries, the appropriate municipality should be consulted. For more information on Greenbelt Area boundaries, the Greenbelt Plan 2005 should be consulted. The Province of Ontario assumes no responsibility or liability for any consequences of any use made of this map.

Appendix 2

City of Brampton Places to Grow Conformity Workplan

ID	Task Name	Study Number	2006				2007				2008				2009				2010			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
1	I - Provincial Requirements																					
2	Delineation Built Boundary																					
3	Delineation of Urban Growth Centre																					
4																						
5	Identify Intensification Areas:																					
6	Urban Growth Centre																					
7	Intensification Corridors																					
8	Major Transit Station Areas																					
9	Redevelopment Sites																					
10	Expansion and Conversion of Buildings																					
11																						
12	Sub-Area Assessments at the Regional Level																					
13	Assessing Need for New Greenfields																					
14	Participating in Regional Economic Analysis																					
15	Evaluate Transportation Network																					
16	Identifying Natural Systems																					
17	Identifying Prime Agricultural Land																					
18	Identifying Material Aggregate Resources																					
19																						
20	II - Inventory and Analysis																					
21	Greenfield Land Inventory	1																				
22	Employment Land Inventory	2																				
23	Review of Current Built Densities - Greenfield, UGC	3																				
24	Review of Planned Densities - OP, Sec Plans, Block Plans	3																				
25	Intensification Review & Analysis (min densities, form)	4																				
26	Review of Engineering, Transportation and Community Infrastructure Capacities and Constraints	5																				
27																						

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Project: Places to Grow Work Plan Date: Tue 07/02/13	Task		Milestone		External Tasks	
	Split		Summary		External Milestone	
	Progress		Project Summary		Deadline	

Appendix 2

City of Brampton Places to Grow Conformity Workplan

ID	Task Name	Study Number	2006				2007				2008				2009				2010			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
55	VI - Databases, Reports & Monitoring Program																					
56	Land Inventories - Residential & Employment																					
57	Intensification Targets																					
58	Minimum Density Targets																					
59	Collection and Maintenance of Employment Data																					
60	Migration of Planning Data to GIS																					
61	Integration of AMANDA with GIS																					

G1-24

Project: Places to Grow Work Plan Date: Tue 07/02/13	Task		Milestone		External Tasks	
	Split		Summary		External Milestone	
	Progress		Project Summary		Deadline	

Appendix 3

**Places to Grow Conformity
City of Brampton**

I Summary of Required Studies

1. Greenfield Land Inventory

- An inventory of Greenfield Land in Brampton (and all area municipalities in Peel) required to assess ability to accommodate population and employment growth and population /employment ratio and inform intensification strategy.

Resource-Internal: COB Planning (GM + Tech Services) and IT

Resource-External: Potential Consultant support to integrate and analyze data across Region

Estimated Cost: \$100,000

Recommended Budget: Region

Timing: 2007

2. Employment Land Inventory and Analysis

- An inventory of Employment Land in Brampton (and across the Region of Peel) including vacant, underdeveloped, developed and planned land required to assess ability to accommodate employment growth and maintain population/employment ratio. Assess employment land location relative to Growth Plan policies and identify any land conversion/long term supply issues. Provides background to regional economic analysis to be undertaken as part of sub area assessment.

Resources-Internal:: Economic Development and Planning (GM) Staff

Resources-External : Development Economics Consultant

Estimated Cost: \$125,000*

Recommended Budget: Region/City

Timing: 2007

* May be less if inventory previously undertaken is complete

3. Review of Built Densities and Planned Densities

- Update of existing built and planned densities in Brampton (and across the Region of Peel) to determine greenfield densities relative to minimum greenfield density requirements in Plan; informs need for changes to policies on housing mix/densities in Official Plan and Secondary Plans to meet housing policies and minimum density requirements.

Resources-Internal: COB (GM and IT) through update to Density Tracking Study

Estimated Cost : Internal operating (all municipalities)

Timing: 2006-2007

4. Inventory and Assessment of Intensification Opportunities

- Includes inventory of land suitable for all types of intensification in built up area and Greenfield including:
 - vacant land (within built up area)
 - underutilized land (within built up area)
 - potential building expansion/conversion (within built up area)
 - identification and delineation of appropriate intensification corridors
 - Urban Growth Centre
- Development of policy framework and alternatives for intensification
- Development of potential population/employment projections to each form of intensification
- Identifies and informs required changes to Official Plan, Secondary Plans and other guiding documents to facilitate intensification

Resources-Internal: COB Planning (GM +Community Design)

Resources-External : Planning Consultant (updating of databases and forecasting methodology based on 2006 census)

Cost: \$125,000

Recommended Budget: City of Brampton

Timing: 2007

5. Review and Assessment of Existing Infrastructure and Future Capacity

- Extensive review and analysis of capacity for existing hard and soft infrastructure to accommodate growth through Greenfield development and intensification (particularly UGC minimum density of 200 p+j/hectare); level of service analysis

- Engineering Services (sewer and water) Capacity Study

Resources-Internal: COB Works; Planning (GM)

Resources-External : Engineering Consultant

Cost: \$175,000

Recommended Budget: Region

- Transit and Transportation Capacity Study including Cycling Infrastructure

Resources-Internal: COB Transit; Planning (Transportation)

Resources-External: Transportation Consultant

Cost: \$150,000

Recommended Budget: City of Brampton

- Recreation, Parks and Open Space Review –Addendum to Parks Master Plan

Resources-Internal: COB Parks Planning

Resource-External: Recreation/Planning Consultant

Cost: \$40,000

Recommended Budget: City of Brampton

Timing: 2007-2008

6. Financial and Municipal Operations

- Review and analysis of impacts on municipal operations such as works and transportation, emergency services operation.

Resources-Internal : COB Finance, PDD

Resources-External : Consultant

Cost : \$110,000

Recommended Budget: City of Brampton

Timing: 2009

7. Allocation of Population and Employment Across Region

- Update of population forecasts following 2006 Census release; distribution of revised area municipal population across the Region to achieve Growth Plan numbers, based on Intensification Strategy developed across Region; including expert analysis of supply, market, demand

Resources-Internal : COB Planning (GM)

Resources-External: Demographic/population consultant

Costs: \$150,000

Recommended Budget: Region

Timing: 2008

8. Public Awareness Strategy

- Development of communication strategy, and tools (brochures, website, pamphlets) and ongoing public awareness and consultation program to ensure community understanding of Growth Plan principles and changes forthcoming to planning approach; aim to increase community acceptance of Growth Plan principles

Resources: COB Communications/Planning (GM)

Cost: \$250,000 over 3 years

Recommended Budget: City of Brampton

Timing: 2007, 2008, 2009

II Projected Study Costs

<i>Study</i>	<i>Total costs</i>	Funding Year -City Costs			Total Projected Cost to City
		2007	2008	2009	
1. Greenfield Land Inventory	\$100,000.00				
2. Employment Land Inventory	\$125,000.00	\$40,000			\$40,000
3. Built and Planned Density Review	Internal	Internal			Internal
4. Intensification Study	\$125,000.00	\$125,000.00			\$125,000.00
5. Infrastructure Capacity Analysis	\$465,000.00	\$40,000.00	\$150,000.00		\$190,000.00
6. Financial and Municipal Operations Review	\$110,000.00			\$110,000.00	\$110,000.00
7. Population and Employment Allocation	\$150,000.00				
8. Public Awareness Strategy	\$250,000.00	\$50,000.00	\$100,000.00	\$100,000.00	\$250,000.00
<i>Annual costs to City</i>		\$255,000.00	\$250,000.00	\$210,000.00	\$715,000.00
<i>Total Estimated Cost</i>	<i>\$1 325,000.00</i>				

Note: Assumes Region, as Upper Tier Municipality with designated responsibilities under the Growth Plan, assumes costs of certain studies, including infrastructure capacity analysis, land inventory and demographics.

Brampton

G1-29

PLANNING, DESIGN & DEVELOPMENT

January 17, 2007

Tija Dirks
Director, Growth Policy, Planning and Analysis
Minister of Public Infrastructure Renewal
777 Bay Street, 16th Floor
Toronto, ON
M5G 2E5

Dear Ms Dirks:

RE: Technical Paper on a Proposed Methodology for Developing a Built Boundary for the Greater Golden Horseshoe City of Brampton Comments

The City of Brampton staff have reviewed the Technical Paper and offer the following comments for the Ministry's consideration in finalizing the methodology. Please be aware that given the response deadline, that Brampton City Council has not formally endorsed staff's comments, however, a Council resolution will be forthcoming after Council's consideration of staff report in February.

Notwithstanding the recognized shortcomings of the MPAC data, the methodology outlined in Steps 1-3 is generally acceptable given the refinement steps which are to follow. Lands owned by public agencies, such as the municipalities and conservation authorities within urban areas serve an extremely important function in the provision of accessible open space and recreational opportunities for a significant population. The proposed methodology would result in their designation as within the "built boundary", which is supported and ensures that pressure to develop the greenspace in order to achieve the density targets does not result.

In attempting to develop a technical approach to the establishment of the built boundary, the Province is creating rules which frustrate the achievement of some of the most significant Growth Plan principles ("*building compact, complete communities*" and "*optimizing the use of existing and new infrastructure to support growth in a compact, efficient form*"). According to the proposed methodology, all of the vacant lands within the Mt. Pleasant community in northwest Brampton would be deemed to be greenfield. A significant proportion of these units are located within 500 metres of the existing Mt. Pleasant GO

Station, a Major Transit Station Area under the Growth Plan and key infrastructure element around which the community planning is taking place. Such lands should be designated as falling within the built boundary where they are contiguous to an existing built up area. This would recognize the extensive investment in infrastructure represented by the Mt. Pleasant GO station. Planning for this area anticipates the development of a mixed use, transit oriented community with sufficient densities to support higher order transit service, including both the GO rail service and bus rapid transit, which would meet the Growth Plan's land use, intensification and transportation goals. Development in the immediate area of the GO station is planned to add approximately 3,000 units by 2031 by making use of existing transit infrastructure-consistent with the intensification principles described in the Growth Plan. Unless this area is identified within the built boundary, the achievement of the intensification goals, particularly the intensification target, will be compromised.

The proposed methodology in the Technical Paper would effectively discourage municipalities from planning higher density, transit oriented developments which align well with the Growth Plan principles. Brampton's example is similar to that in the Town of Markham wherein the town has undertaken a planning exercise to increase the densities along the Highway 7 corridor, as a main transit corridor, but because of the Proposed Methodology, it would be deemed to be "greenfield" and therefore not contribute toward meeting the intensification target. The proposed refinement methodology does permit expanding the built boundary within 1 km of a 400 series highway, but no similar recognition is proposed for lands within 1 km of rail infrastructure providing passenger service. Rather than create a situation of disincentives for these situations, the Province should be identifying higher density planned communities designed to make use of existing transportation/transit infrastructure as built up lands, falling within the built boundary, where they are contiguous to the otherwise defined built boundary.

Refinement step vi) proposes that only those "holes" that are less than 6.2 hectares may be identified as built. Staff believe that given that this is an arbitrary size, that areas larger than this, especially those that are designated for more intense or mixed use development should also be assigned a "built" designation so that once developed, such development may be counted toward the intensification target.

The Technical Paper acknowledges that although MPAC data is recognized as the only dataset which tracks residential units continuously across all GGH municipalities, the MPAC data is often out of date and inaccurate. The methodology attempts to overcome issues with multiple uses on one property however, if this data is to be used for ongoing monitoring, attention should be paid to precisely how the dataset should be arranged and maintained to provide the greatest of integrity for future monitoring. The Province should direct that an overhaul of the system be undertaken to ensure this happens.

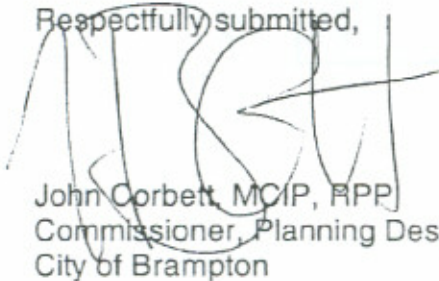
In the absence of sufficient opportunity to view the draft built boundary maps prepared by PIR before comments were finalized, it is more difficult to appreciate the implications of the detailed methodology. It is requested that the final deadline for comments be extended until following the review of the preliminary built boundary with PIR staff, which for Peel Region, has just been scheduled for February 5, 2007. It is unclear how the input received at the upcoming meeting with PIR is to be used in the final determination of methodology or the delineation of the final boundary, or what the expectations are following the meeting.

Given the Places to Grow Act requirement for Official Plan conformity by June, 2009, the City of Brampton is concerned with the amount of time it has taken to date and will take before the built boundary is established, as its determination is essential prior to proceeding with many of the required studies and analyses.

Following Council consideration of staff comments, the formal Council resolution will be forwarded as the City's official submission.

Staff understand that one of the next essential Growth Plan boundaries that need to be defined is the Urban Growth Centre boundary, which is of significant interest to the City of Brampton. As you are aware, the Natural Hazard policies of the Provincial Policy Statement limit new development within a floodway, and in Brampton's case, the Special Policy Area designation approved under this section covers the City's downtown, where higher densities should be encouraged in accordance with the UGC minimum density requirements. The City of Brampton urges the Province to respond to this conflict before the formal steps are initiated on the UGC boundary. We welcome your response on this request and look forward to meeting with the appropriate Provincial staff to resolve this conflict.

Respectfully submitted,



John Corbett, MCIP, RPP
Commissioner, Planning Design and Development
City of Brampton

Cc Mayor Susan Fennell and Members of Council, City of Brampton
Lorne McCool, City Manager, City of Brampton
Adrian Smith, Director, Planning and Land Development Services
Janice Given, Manager, Growth Management and Special Policy

JG/

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Appendix 5
Conceptual Drawing of the Built Boundary

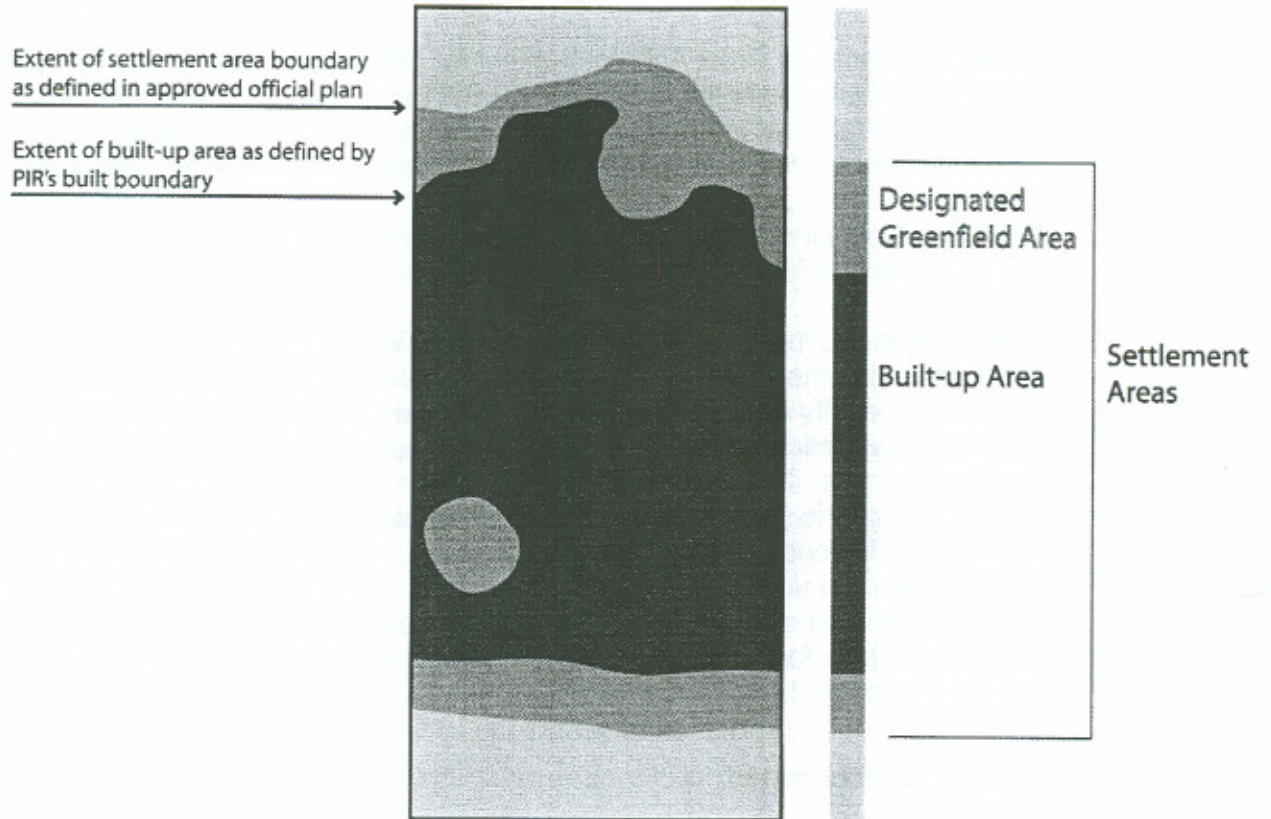


Figure 2: Definitions and terminology.