

February 28, 2019

The Honourable Steven Clark  
Minister of Municipal Affairs and Housing  
College Park, 17<sup>th</sup> Floor  
777 Bay Street  
Toronto, Ontario  
M5G 2E5

**Re:**

- **Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the *Planning Act* to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017**
- **Proposed Framework for Provincially Significant Employment Zones**

Dear Minister Clark:

The City of Brampton appreciates the opportunity to provide comments and feedback on the proposed changes to the Growth Plan 2017, and through this letter, submit our official comments for the Minister's consideration. The City notes that our review and comments are limited only to the official documentation issued by the Ministry of Municipal Affairs and Housing (MMAH) on January 15, 2019 through the Environmental Registry of Ontario website. The four documents collectively form the proposed changes to the Growth Plan and our assessment addresses the key policy changes and their potential impact on the City of Brampton. The key proposed changes are categorized into eight main components described below with detailed comments included in attached Appendix A, supported by the summary table in Appendix B.

1. Intensification and Density Targets

Under the proposed MMAH changes, the intensification targets relevant to the Region of Peel are maintained at 60% for all annual new residential development within the delineated built-up boundary, however, the proposed timeline to implement it has now been modified.

The City of Brampton believes that the current phased implementation approach after a Municipal Comprehensive Review process (MCR) is beneficial, and helps to ease development in achieving the intensification targets set by MMAH. By requiring an abrupt implementation target of 60% immediately after an MCR, the City of Brampton is concerned this will create additional challenges and complexities to the implementation process and in achieving the ultimate intensification goal.

Reduced density targets of future development in designated greenfield areas from 80 residents/job per hectare to 60 residents/job per hectare are proposed; excluding employment areas. This is not expected to be implemented equally between the lower-tier municipalities. However, the City of Brampton supports the clear exclusion of the characteristically low density employment areas which will facilitate achieving the density targets proposed.

## 2. Planning for Employment

The province has identified 29 Provincially Significant Employment Zones (PSEZ) that are deemed significant to the regional and provincial economy and that would require provincial input and approval prior to any non-employment use conversion. The City of Brampton requests MMAH to consider the proposed Employment Zones in accordance with the current City of Brampton 2006 Official Plan, and the employment lands reflected in the City of Brampton Vision 2040 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.

Currently no mechanism to refine Employment Zone boundaries prior to a Municipal Comprehensive Review (MCR) has been provided. Therefore, the City requests that a defined process to address changes to the proposed PSEZ mapping be clarified and detailed. This will give municipalities time to ensure appropriate lands have been incorporated in the zones for future safeguarding.

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.

The City of Brampton notes that the Brampton City Council approved on April 26th, 2017 a number of employment land use conversions through a formal MCR process, commenced under the 2006-2017, Growth Plan by the City. Based on Council resolution PDC081 the City requests that the subject lands, as shown in attached map, be removed from the proposed PSEZ boundaries.

## 3. Major Transit Station Area (MTSA)

Currently the 2006 City of Brampton Official Plan identifies five MTSA areas throughout the City of Brampton, and an additional four mobility hub areas which have an enhanced level of adjacent development and infrastructure. The City supports the intention of the proposed MMAH changes to streamline the approach for delineating MTSA's as they 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 should support and foster increased transit ridership. The distribution of the MTSA areas throughout the City will ensure that development density is appropriately spread to avoid isolated density

pockets. This will support the City's transit strategy and long term intensification goals set out in the 2040 vision.

The City of Brampton is concerned however where such 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.

Clarity on such cases is requested particularly as this may apply to the Bramalea Go station area within the City of Brampton.

#### 4. Settlement Boundary Expansion

The Settlement Area boundary within the City of Brampton is well defined and currently encompasses almost the entire city. Therefore, proposed policy changes regarding further expansion of the boundary have no impact on the City of Brampton and its future growth.

#### 5. Small Rural Settlements

Policy changes in this regard do not apply to the City of Brampton as no designated Rural Settlements or Hamlets are currently identified in the 2006 Official Plan.

#### 6. Natural Heritage System and Agriculture Area Mapping

There are no implications from the proposed changes related to Natural Heritage System (NHS) and Agriculture Area mapping on the City of Brampton, as all current NHS mapping for the City is sufficiently detailed and accurate.

#### 7. Municipal Comprehensive Review (MCR)

In principal, the City of Brampton supports allowing certain planning matters to proceed prior to an MCR, especially with respect to establishing employment targets and delineating MTSA areas early on. However, there is a risk associated in doing so for other more complex matters, such as the conversion of employment lands, which is best addressed more holistically within a full MCR process.

#### 8. Transitional Development

At the moment there are several applications (submitted and under appeal) within the City of Brampton that will be subject to this transitional regulation, particularly those subject to the previous 2006 Growth Plan, and so it is necessary to identify them to MMAH (as noted in Appendix A).

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, should be addressed through the transition regulation such that Official Plan Amendments which were adopted before July1, 2017, pursuant to a

municipal comprehensive review, are governed by the Growth Plan in effect at the time of adoption and not by the Growth Plan 2017. Specifically, this refers to City of Brampton OPAs 126, 127, 128, 129, 130 and 133.

The City of Brampton would like to once again thank MMAH for the opportunity to provide feedback on important proposed legislations and hope that the comments and recommendations herein will be taken into serious consideration as part of the policy consultation process.

Sincerely,

Rick Conard,  
Acting Commissioner, Planning and Development Services  
City of Brampton  
(905) 874-2440

*Attachments:*

- *Appendix A: Detailed City of Brampton Comments on Key Items of the Proposed Changes*
- *Appendix B: Summary Table of Proposed Key Policy Changes to The Growth Plan 2017*

## **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.

**Appendix B:**  
**Summary Table of Proposed Key Policy Changes To The Growth Plan 2017**

Section	Proposed Amendment	City of Brampton Comments
<b>Introduction</b>		
1.2	New objective to match housing supply with market demand.	This will be hard to define, and unclear whether this will entail a market study as part of new housing development.
1.2	Removal of the concept of “net zero” communities, replaced with the concept of “environmentally sustainable” communities.	Although the terminology remains vague, this has no impact on the City of Brampton.
<b>Where and How to Grow</b>		
2.1	Removal of the concept that there is a large supply of land already designated for future urban development which may exceed needs.	This is not relevant to the City of Brampton
<b>Managing Growth</b>		
2.2.1.2.b	Change from growth being limited in “undelineated built-up areas” to being limited in “rural settlements”. “Rural settlements” is a newly defined term. “undelineated built-up areas” is removed as a term.	City of Brampton supports this clarification.
2.2.1.6.c	Reminder to use “additional tools” for lapsing provisions and deregistration of plans of subdivision in situations where excess lands have been identified. This is only applicable to outer ring municipalities.	As City of Brampton does not foresee excess lands for development, this is not relevant.
<b>Delineated Built-up Areas</b>		
2.2.2.1	<p>Removal of the requirement that 50% of all residential development occurring annually occur within the delineated built-up area by the time of the next MCR and up to 2031.”</p> <p>“Removal of the requirement that 60% of all residential development occurring annually occur within the delineated built-up area by 2031. Replaced with targets that scale with degree of urbanization of a municipality:</p> <ul style="list-style-type: none"> <li>• 60% for Hamilton, Peel Region, Waterloo Region, York Region</li> <li>• 50% for Barrie, Brantford, Guelph, Orillia, Peterborough, Durham Region, Halton Region, Niagara Region</li> <li>• Maintain or improve upon existing target for Kawartha Lakes, Brant County, Dufferin County, Haldimand County, Northumberland County, Peterborough County, Simcoe County, Wellington County.</li> </ul> <p>Removal of the requirement that 50% of all residential development occurring annually occur within the delineated built-up area by the time of the next MCR and up to 2031.”</p>	Target relevant to City of Brampton is the same, however the lack of phased approach is a concern, request to maintain the phased implementation of intensification targets.
2.2.2.4	Simplification of the alternative minimum intensification target request criteria to being that it is appropriate given the size, location, and capacity of the delineated built-up area.	City of Brampton supports this proposed change.
<b>Transit Corridors and Station Areas</b>		
2.2.4.4	Simplification of the criteria applied to a request for reducing the targeted combined residents and jobs per hectare to: a) prohibited or severely restricted by provincial policy, b) there are a limited number of jobs or residents but a major trip generator or feeder service will sustain high ridership at the station/stop.	Clarification required, 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.
2.2.4.5	<p>Upper- and single-tier municipalities may delineate the boundaries of major transit station areas and identify minimum density targets in advance of an MCR, if done in accordance with s. 16(15), (16) of the <i>Planning Act</i>.</p> <p>Note: s. 16(15), (16) of the <i>Planning Act</i> deal with the minimum requirements that an OP must meet when identifying planned higher order transit stations and stops or protecting major transit station areas for lower and upper tier municipalities, respectively.</p>	City of Brampton supports this proposed change, with caveats.

<b>Employment</b>		
All	Removes the concept and definition of “prime employment area” Note: “Prime employment area” is essentially meant to identify land extensive employment uses.	City of Brampton supports this proposed change.
2.2.5.6	Adds a clarification that employment lands may be designated in advance of the next MCR.	Staff contend that such applications are best considered holistically, as this facilitates consideration of the collective impact of all applications on employment lands.
2.2.5.8	Adds the concept of land use compatibility between sensitive land uses, major retail uses and major office uses and industrial, manufacturing or other uses particularly vulnerable to encroachment.	City of Brampton supports this proposed change.
2.2.5.10	Allows for the conversion of employment lands to a designation that permits non-employment uses in advance of an MCR, provided that it is demonstrated there is: a need, no adverse effects on the viability of an employment area or achievement of minimum intensification targets, there are existing or planned services in place, and a significant amount of jobs are maintained on the lands. Note: This is allowed only once prior to the MCR process.	Staff contend that such applications are best considered holistically, as this facilitates consideration of the collective impact of all applications on employment lands.
2.2.5.12	Minister may now identify provincially significant employment zones to support coordination of planning for jobs and economic development at the regional scale. Lands so identified cannot be converted using s. 2.2.5.10.	City of Brampton supports this proposed change. Mapping refinements prior to implementation require further clarity.
2.2.5.14	Redevelopment of employment lands should maintain similar amounts of jobs on site.	Further clarity on criteria, how this is addressed or calculated would be helpful.
2.2.5.16.d	Addition of the requirement that non-employment uses in an office park are limited and do not negatively impact the primary function of the area.	City of Brampton supports this proposed change.
<b>Designated Greenfield Areas</b>		
2.2.7.2	Removal of the requirement that all designated greenfield areas meet a minimum of 80 residents and jobs combined per hectare. Replaced with targets that scale with degree of urbanization of a municipality: <ul style="list-style-type: none"> <li>• Minimum 60 for Hamilton, Peel Region, Waterloo Region, York Region</li> <li>• Minimum 50 for Barrie, Brantford, Guelph, Orillia, Peterborough, Durham Region, Halton Region, Niagara Region.</li> <li>• Minimum 40 for Kawartha Lakes, Brant County, Dufferin County, Haldiman County, Northumberland County, Peterborough County, Simcoe County and Wellington County.</li> </ul>	City of Brampton supports this proposed change.
--	Removal of former s. 2.2.7.4 which granted upper- and single-tier municipalities in the inner ring an exemption from the requirement to meet the 80 residents and jobs combined per hectare target where an official plan was approved and in effect as of July 1, 2017., but, required that over time intensification occur.	This is superceded by the above targets, therefore this is not applicable for comment
2.2.7.4	Simplification of the requirements that must be met in a request for an alternative target in the DGA to being: 1) the target cannot be achieved, 2) the alternative target will support housing diversity, and 3) the alternative target will help achieve a more compact built form.	This City supports this clarification.
--	Removal of policies indicating the targets in Official Plans already in effect continue to apply.	This does not apply to the City of Brampton.

<b>Settlement Area Boundary Expansions</b>		
2.2.8.3.e.	The Natural Heritage System for the Growth Plan should be avoided where possible when considering a settlement area expansion. Note the addition of a definition below.	City of Brampton suggests language to "prohibit" rather than "avoided" to adequately protect NHS lands.
2.2.8.4	Settlement area boundaries may be adjusted without a MCR when: <ul style="list-style-type: none"> <li>• There would be no net increase in land within settlement areas;</li> <li>• The adjustment would support the municipality's ability to meet the intensification and density targets established pursuant to the Plan;</li> <li>• The location of any lands added to a settlement area will satisfy the normally applicable requirements of settlement area expansion;</li> <li>• The affected settlement areas are not rural settlements or in the Greenbelt Area; and</li> <li>• The settlement area is serviced by municipal water and wastewater systems and there is sufficient reserve infrastructure capacity to service the lands.</li> </ul>	This does not impact the City of Brampton as most of the lands are already designated as Settlement Area.
2.2.8.5	Settlement area boundary expansion may occur in advance of a MCR when: <ul style="list-style-type: none"> <li>• The lands that are added will be planned to achieve at least the minimum density targets set out in the Growth Plan;</li> <li>• The location of any lands added to a settlement area will satisfy the normally applicable requirements of settlement area expansion;</li> <li>• The affected settlement areas are not rural settlements or in the Greenbelt Area;</li> <li>• The settlement area is serviced by municipal water and wastewater systems and there is sufficient reserve infrastructure capacity to service the lands; and,</li> <li>• The additional lands and associated forecasted growth will be fully accounted for in the land needs assessment associated with the next municipal comprehensive review.</li> </ul>	This does not impact the City of Brampton as most of the lands are already designated as Settlement Area.
2.2.8.6	Settlement area expansion may occur under 2.2.8.5 (above) as long as the amount to be added to the Settlement Area is no larger than 40 hectares.	This does not impact the City of Brampton as most of the lands are already designated as Settlement Area.
<b>Rural Areas</b>		
2.2.9	Minor adjustments may be made to boundaries of the rural settlements without an MCR, if: <ul style="list-style-type: none"> <li>• The affected settlement area is not in the Greenbelt Area;</li> <li>• The change would constitute minor rounding out of existing development, in keeping with the rural character of the area;</li> <li>• Confirmation that water and wastewater servicing can be provided in an appropriate manner that is suitable for long-term; and,</li> <li>• Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied.</li> </ul>	This does not apply to the City of Brampton, no rural settlement designations exist within the City.

Infrastructure to Support Growth		
3.2.1.2	Planning for new or expanded infrastructure will be supported by “relevant studies” and no longer requires specifically “infrastructure master plans, asset management plans, community energy plans, watershed planning, and environmental assessments”.	City of Brampton supports this proposed change.
Protecting What is Valuable		
Water Resources Systems		
4.2.1.3	Watershed planning, in addition to informing decisions on the allocation of growth, will now inform: <ul style="list-style-type: none"> <li>• The identification of water resource systems;</li> <li>• The protection, enhancement, or restoration of the quality and quantity of water; and</li> <li>• Planning for water/stormwater infrastructure.</li> </ul>	City of Brampton supports this proposed change.
Natural Heritage System		
4.2.2.4	Mapping for the Natural Heritage System for the Growth Plan does not apply unless implemented in an applicable OP. Until that time, the Natural Heritage System for the Growth Plan policies only apply to natural heritage systems identified in upper- and single-tier OPs that are outside settlement areas and were approved and in effect as of July 1, 2017.	This does not impact the city as mapping is already sufficiently detailed.
4.2.2.5	Mapping for the Natural Heritage System for the Growth Plan may be refined by upper- or single-tier municipalities at the time of initial implementation of OP, but afterwards it may only be refined through a MCR.	This does not impact the city as mapping is already sufficiently detailed.
Agricultural System		
4.2.6.3	Mitigation measures to limit affect non-agricultural uses on agricultural uses will be based on an agricultural impact assessment.	No significant agricultural lands exist within the City, this is irrelevant.
4.2.6.8	Mapping for the agricultural land base does not apply unless implemented in an applicable OP. Until that time, prime agricultural areas identified in upper- and single-tier OPs that were approved and in effect as of July 1, 2017 will be considered agricultural land base for the purposes of the Growth Plan.	No significant agricultural lands exist within the City, this is irrelevant.
4.2.6.9	Mapping for the agricultural land base may be refined by upper- or single-tier municipalities at the time of initial implementation of OP, but afterwards it may only be refined through a MCR.	No significant agricultural lands exist within the City, this is irrelevant.
Implementation and Interpretation		
5.2.2	The Minister can identify, establish, or update, “provincially significant employment zones”.	Clarity on refinement of these areas in coordination with local governments is required.
5.2.3	The Province may review and update provincially significant employment zones, the agricultural land base mapping, or the Natural Heritage System for the Growth Plan in response to a municipal request.	The process for Employment Zones' review and update needs additional clarity.

Simcoe Sub-Area		
6.3.5	Any lands that are designated for agricultural uses or rural uses in a lower-tier official plan as of January 20, 2017 can only be designated for development in accordance with the policies of s. 2.2.8 (Settlement Area Boundary Expansion).	This does not apply to the City of Brampton geographically.
Definitions		
Changed: Designated Greenfield Area	Lands within <i>settlement areas</i> (not including <i>rural settlements</i> ) but outside of <i>delineated built-up areas</i> that have been designated in an official plan for development and are required to accommodate forecasted growth to the horizon of this Plan. <i>Designated greenfield areas</i> do not include <i>excess lands</i> .  Note: Does not include <i>rural settlements</i> .	City of Brampton supports this clarification.
Changed: Excess Lands	Vacant, unbuilt but developable lands within <i>settlement areas</i> but outside of <i>delineated built-up areas</i> that have been designated in an official plan for development but are in excess of what is needed to accommodate forecasted growth to the horizon of this Plan.  Note: Now includes “vacant, unbuilt but developable lands”.	This has no impact on the City of Brampton.
Removed: Innovation Hubs	Locations that support collaboration and interaction between the private, public and academic sectors across many different economic sectors to promote innovation.	This does not apply to the City of Brampton
Changed: Major Transit Station Area	The area including and around any existing or planned <i>higher order transit</i> station or stop within a <i>settlement area</i> , or the area including and around a major bus depot in an urban core. <i>Major transit station areas</i> generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.  Note: Can now be 500 to 800 metre radius from a transit station.	City of Brampton supports this clarification.
Changed: Major Trip Generators	Origins and destinations with high population densities or concentrated activities which generate many trips (e.g., <i>urban growth centres</i> and other downtowns, <i>major office</i> and <i>office parks</i> , <i>major retail</i> , <i>employment areas</i> , community hubs, large parks and recreational destinations, post-secondary institutions and other public service facilities, and other mixed-use areas).	This does not apply to the City of Brampton
Added: Natural Heritage System for the Growth Plan	The <i>natural heritage system</i> mapped and issued by the Province in accordance with this Plan.	City of Brampton supports this clarification.
Changed: Office Parks	Areas where there are significant concentrations of offices with high employment densities.  Note: No longer has to be in an employment area designated in an OP.	City of Brampton supports this clarification.
Removed: Prime Employment Area	Areas of employment within <i>settlement areas</i> that are designated in an official plan and protected over the long-term for uses that are land extensive or have low employment densities and require locations that are adjacent to or near <i>major goods movement facilities and corridors</i> . These uses include manufacturing, warehousing, and logistics, and appropriate associated uses and ancillary facilities.	City of Brampton supports this proposed change.
Added: Rural Settlements	Existing hamlets or similar existing small settlement areas that are long-established and identified in official plans. These communities are serviced by individual private on-site water and wastewater systems contain a limited amount of undeveloped lands that are designated for development. All settlement areas that are identified as hamlets in the Greenbelt Plan, as rural settlements in the Oak Ridges Moraine Conservation Plan, or as minor urban centres in the Niagara Escarpment Plan are considered rural settlements for the purposes of this Plan, including those that would not otherwise meet this definition.	This does not apply to the City of Brampton
Removed: Undelineated Built-up Areas	Settlement areas for which the Minister has not delineated a built boundary pursuant to this Plan.	This does not apply to the City of Brampton