

RE: Environmental Registry of Ontario Posting 019-6167 - Proposed Revocation of the Parkway Belt West Plan

From: Steve Ganesh, Commissioner (A), Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed revocation of the Parkway Belt West Plan. The City recognizes the role this Plan originally held to designate and protect land for large-scale infrastructure corridors, including transit, hydro and electric power facilities. The City has provided more detailed comments to the ERO posting in **Appendix 1**.

In the Brampton context, the Parkway Belt West lands are mainly occupied by the Highway 407 and parallel Transmission Corridor. Aligning with the original intentions of the Plan, the lands within this area have limited developable capacity to support housing. This area is located within the Lester B. Pearson International Airport Operating Area and within Provincially Significant Employment Zones. The Parkway Belt West Plan provided protection to adjacent employment land uses, which play a critical function in providing jobs for Brampton's growing population and supporting the greater economic development of the Greater Golden Horseshoe, Ontario, and Canada.

The original intent of the Parkway Belt West Plan, to provide for a land reserve for future linear facilities, creating links between urban areas for the movement of people, goods, energy and information, as well as providing a system of open space and recreational facilities, is still important to consider based on the local municipal context. If the Plan is revoked, the City recommends that this initial intent for these lands is not lost in other Provincial planning documents.

As these lands play an important function for the City's Employment Areas and connects Brampton to neighbouring municipalities, the City recommends the Province conduct an assessment of the Parkway Belt West Corridor to determine potential investments, such as a multi-modal service road, to support additional transportation infrastructure along the 407 corridor to alleviate local traffic on parallel corridors such as Steeles Avenue. The City also recommends the evaluation of further public transit infrastructure along this corridor to support the movement of people resulting from the addition of 113,000 new housing units in Brampton to 2031.

Thank you for the opportunity to provide comments on these proposed changes.

Sincerely,



Steve Ganesh, MCIP, RPP
Commissioner (A),
Planning, Building and Growth Management
City of Brampton

Appendix 1: Proposed Changes to the Proposed Revocation of the Parkway Belt West Plan

General Proposed Changes	City Comments	Recommendations
<p>Existing Provincial Plans provide an updated policy framework that makes the Parkway Belt West Plan Outdated: The Plan has been successful over the years in protecting transportation and utility corridors for projects (e.g., Hwy 403, Hwy 407, transitway corridors, hydro corridors) that were planned for, and most of which were built decades ago. Over the years, provincial legislation, land use policies (e.g., Provincial Policy Statement) and provincial plans have provided a more modernized and up-to-date policy framework that has resulted in the Parkway Belt West Plan becoming outdated. This includes policies in the Provincial Policy Statement and Provincial Plans related to infrastructure, natural heritage, agriculture, parks and open space.</p>	<p>The City acknowledges that direction regarding transportation corridors is provided in other provincial policies and plans (e.g., PPS Section 1.6.8 and GGH Transportation Plan Section 4.2), particularly the PPS policy direction (1.6.8.1) that planning authorities plan for and protect corridors and rights-of-way for infrastructure. If this wording is seen as equivalent to the “providing space for the movement of people, goods...” and “provide a land reserve for future linear facilities” wording in the PBWP, then the City is amenable to the proposed change.</p> <p>Further to direction in the PPS, staff contend that planned development in the PBWP area should, per Section 1.6.8.3, be compatible with, and supportive of, the long-term purpose of the corridor and should be designed to avoid, mitigate or minimize negative impacts on and from the corridor and transportation facilities.</p>	<p>The City recommends the Province conduct an assessment of the Parkway Belt West Corridor to determine potential investments to support additional transportation infrastructure along the 407 to alleviate local traffic on parallel corridors</p>
<p>Goals of the Plan are no longer applicable: The Parkway Belt West Plan and the Minister’s Zoning Orders have been amended over 200 times to make Plan policy changes and re-designate or remove lands from the Parkway Belt West Plan. This has resulted in a 43% reduction in size of the Plan’s original area of 21,350 ha (52,757 acres) in 1978, to its current size of 12,070 ha (29,830 acres). Non-Infrastructure designations have experienced nearly 100% of the Plan’s reduction. Over time, through these amendments, many of the non-</p>	<p>The City contends that the goals of: (2) creating links between urban area by providing space for the movement of people, goods, energy, and information; and (3) providing a reserve for future linear facilities remain applicable and should remain in effect, and the lands protected, until the planned transportation infrastructure (407 Transitway) is constructed. This is supported by the inclusion of this corridor in the GGH Transportation Plan (Section 4.2 / Map 5). The Transitway, with appropriate rapid and local transit connections, also supports the mobility framework outlined in draft Brampton Plan.</p>	<p>The City recommends the Province ensure the goals of the Plan remain and consideration of the protection of these lands be integrated in other Provincial planning documents.</p>

<p>infrastructure policies have been removed from the Plan, resulting in the goals of the Plan that support providing open space, encouraging recreation, institutional and agricultural uses no longer being applicable.</p>	<p>The City notes that much of the PBWP area in Brampton is adjacent to employment lands (including Provincially Significant Employment Zones) and contend that these areas should be retained for employment uses. Providing jobs in these areas, thereby improving the City’s activity rate, will help reduce average trip lengths in Brampton and will support the provision of transit service and active transportation infrastructure to these areas, which are key to the City achieving its climate change and sustainable mode share targets.</p>	
<p>Intent to provide clear direction to stakeholders: The proposed revocation of this 1978 Plan is intended to provide greater certainty and clarity on regulatory requirements for the lands subject to the PBWP. Stakeholders (e.g., infrastructure agencies, landowners) would no longer have to apply for Plan amendments (\$6,737 each) to permit uses or remove lands from the Plan</p>	<p>The City has no comments.</p>	<p>N/A</p>
<p>Reduced Amendments: Eliminating the Plan would reduce regulatory and financial burdens by removing the usual need for amendments to this outdated Plan that are administered by MMAH, while making processes more predictable across the fourteen impacted municipalities.</p>	<p>The City has no comments.</p>	<p>N/A</p>
<p>Cost to Municipalities: While there are no new administrative costs associated with this proposal, municipalities may experience some minor administrative costs resulting from the need to update their official plans to remove references to Plan mapping and policies that would no longer exist and may need to fill if there are policy gaps</p>	<p>The City recognizes there would be costs to update Official Plans, as well as conduct a review of these lands in the case the Province does not analyze them for additional transportation options.</p>	<p>N/A</p>