

November 22, 2025

Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing
777 Bay Street, 2nd Floor
Toronto, ON M7A 2J3

Subject: City of Brampton Response to ERO 025-1099: Consultation on Simplifying and standardizing Official Plans

To Whom It May Concern,

The City of Brampton appreciates the opportunity to provide comments in response to consultation on simplifying and standardizing official plans as introduced through **Bill 60, *Fighting Delays, Building Faster Act, 2025***.

Brampton appreciates the Province's intent to streamline planning processes, improve consistency across municipal Official Plans, and ensure that growth-related policies are clear, accessible, and easier to update. The City supports efforts that enhance transparency, modernize planning tools, and reduce unnecessary administrative burden. However, as one of Ontario's fastest-growing and most diverse urban municipalities, Brampton relies on a detailed and context-sensitive planning framework to responsibly manage growth, support complete communities, and align infrastructure investment with development. It is within this context that the City offers the following concerns.

Brampton is currently advancing several major area- and corridor-based planning initiatives, including the Queen Street Corridor and all Major Transit Station Areas, which rely on detailed, context-specific policy frameworks to guide the transformation of low-density, single-use areas into complete, transit-oriented communities. Standardization requirements that reduce nuance or eliminate secondary plans risk undermining years of community engagement, technical studies, and implementation sequencing that enable responsible growth to 2051.

Key Concerns

- **Loss of Context-Specific Planning Tools:**

The proposed prohibition of secondary plans would eliminate a core mechanism for addressing area-specific needs related to transportation, environment, land use, and community services. Planning for established, infill-dominant areas is fundamentally different from planning in greenfield contexts such as Area 47 or Heritage Heights, and these distinctions cannot be meaningfully addressed in a single, shortened Official Plan.

- **Reduction of Local Policy Nuance and Community Input:**

Brampton Plan—currently the City's new comprehensive Official Plan—was developed through extensive public and stakeholder engagement. Imposing an arbitrary page limit would compromise the integrity of this work and diminish the City's ability to reflect local objectives, neighbourhood character, and community-driven priorities.

- **Significant Transition and Implementation Burden:**

Consolidating all planning direction into a standardized Official Plan will require substantial staff time and resourcing, particularly related to mapping, data harmonization, and alignment of city-wide policies. This transition would divert resources from current strategic planning initiatives already underway.

- **Risks to Major Growth Corridors and MTSA Implementation:**

Brampton's ability to deliver transit-oriented development relies on detailed sequencing, land use frameworks, and phasing strategies embedded in corridor and secondary plans. Removing these tools could delay implementation and weaken the City's capacity to deliver complete communities around transit investments.

City Staff Recommendation

City staff strongly recommend that the Province:

- Maintain Secondary Plans and other area-specific planning instruments to ensure community needs, local context, and growth management objectives are effectively addressed;
- Avoid imposing an arbitrary limit on Official Plan length, and instead work with municipalities to clarify which content is required in Official Plans versus supporting instruments (e.g., zoning, guidelines, secondary plans);
- Collaborate with municipalities to develop Official Plan requirements that balance consistency with flexibility, ensuring diverse municipal contexts—particularly large, high-growth urban municipalities—retain the tools necessary to plan responsibly and sustainably.

Additional Detail:

Detailed responses to each of the Province's specific consultation questions have been provided in the appendices. These responses offer technical commentary, identify implementation considerations, and outline recommended refinements to ensure the proposed changes support effective local planning and responsible growth management.

Thank you for the opportunity to comment on this proposal.

Yours truly,



Steve Ganesh, MCIP, RPP

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City of Brampton

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Appendix: Detailed Consultation Submission

Discussion Questions:

- a. What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?
 - City staff do not support the approach to simplify and standardize the structure and contents of an official plan for a number of important reasons:
 - Context is critical to ensure the best planning outcomes based on the unique needs of a municipality. Brampton has continually been recognized for its unique planning context, reflective of its diverse population and household demographics that provide both opportunities and challenges. For example, Brampton has some of the highest number of additional residential units in any municipality across Canada.
 - Minimizes authentic and robust consultation in the development of an official plan. Relying on a one-size fits all approach does not allow the City to take unique contextual factors, consult with the public and draft a framework reflective of residents needs.
 - Reduces capacity for the City to dictate a growth and intensification strategy through a tailored approach to city building. Brampton Plan's City Structure reflects a significant engagement process undertaken to the 2040 Vision process to determine a path forward for how Brampton is envisioned in the future. Although section four identifies settlement are structure, the land use designations are standardized in a manner that does not reflect the contextual needs of different locations in Brampton.
 - The City is in the process of undertaking an employment study to align with the Province's new employment definition and has created new designations reflective of balancing provincial priorities for employment areas while also respecting the City's goals and objectives for planning for areas of employment. Standardized designations do not recognize there are specific industries and employment uses in key locations that the City is trying to attract and retain to support the economic growth and prosperity of both Brampton and the province.
 - As the standardized structure is currently proposed, there is no location for special policy areas/site specific policies which are required as an implementation tool for unique cases where standard land use designations do not sufficiently achieve the permissions desired. Staff recommend adding a chapter for special policy areas, or adding special policy areas as content within 'Chapter 10. Implementation and Interpretation'
- b. What distinctions should be made between the content of upper and lower-tier official plans? What considerations should apply in municipalities where the upper-tier official plan acts as the lower-tier official plan?
 - The City of Brampton has no comment, as the Region of Peel Official Plan is now an Official Plan administered by the City of Brampton and is set to be repealed soon.
- c. What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws?
 - City staff disagree with the fact that development standards should only be set out through a zoning by-law. Official plans inform and feed the policy direction to understand intent and applicability that is to be filtered down through zoning permissions.
 - Official plans play a critical role in shaping the long-term growth and character of a community, and including development standards helps to ensure that this vision is consistently realized.

By establishing clear parameters for aspects such as density, building height, setbacks, and lot coverage, official plans provide predictability for both residents and developers, reduce conflicts, and help guide decision-making on development applications.

- Setting development standards in official plans also ensures that growth occurs in a planned and coordinated manner, supporting objectives such as complete communities, infrastructure capacity, and public amenities. While zoning by-laws provide detailed regulations, official plans establish the policy framework that informs those regulations, ensuring they align with the municipality's vision for sustainable, context-sensitive development.
 - In short, including development standards in official plans strengthens Brampton's ability to protect community character, manage growth, and create certainty for all stakeholders, while still allowing zoning by-laws to provide site-specific technical guidance.
- d. What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?
- Secondary Plans provide an important exercise to further refine and address the unique needs of a community. More recent greenfield secondary planning exercises such as Area 47 and the Heritage Heights Secondary Plan reflect years long work to master plan and address the environmental, transportation, land use and social needs of the community to support growth and development to 2051. Removing the ability to undertake Secondary Planning exercises and rather, relying on a city-wide, shortened OP will come at the cost of planning for communities based on their specific context. For example, secondary planning for a greenfield community is starkly contrasted with that for an established community where infill development is the primary avenue for growth. Planning objectives and policies for different areas of a rapidly growing city cannot be effectively addressed within an Official Plan.
 - Staff recommend maintaining Secondary-level planning exercises and rather than imposing an arbitrary limit on the length of Official Plans, staff recommend that the Province work with municipalities to refine the type of content permitted within an Official Plan. Staff emphasize the need for the Province to collaborate with municipalities on OP requirements to ensure the necessary content and policies are included within OP requirements or addressed through other planning instruments (e.g. zoning, secondary plans, guidelines, etc.)
- e. What is your perspective on the number and types of standardized schedules, overlays and data proposed to be required? Should any be removed, or are there any other schedules that could help improve official plans?
- Schedules should be added regarding Transit Network and Active Transportation Network that will provide the existing and future conceptual expansions for transit service and multimodal connections
 - Clarification will be required to decipher "Man-made Hazards" in proposed Schedule C2 and "Human-made Hazards" in C3
 - Clarification will be required regarding whether there is flexibility in the types of overlays and data that can be displayed on the proposed standardized schedules and acknowledging that different municipalities may require different types of data for the standardized schedules (e.g. rural municipalities may not have a variety of intensification area overlays the way that an urban municipality would)
 - There should be schedules for site and area specific policies, as there are site specific Official Plan amendments that are required especially when there are standardized designations.

B. Limiting the Length of Official Plans

Currently, the length of official plans varies across municipalities (e.g., from around 150 pages to over 600 pages). Ontario municipalities' official plans also tend to have higher page counts than official plans in other provinces. The government is proposing to limit the length of official plans, for example, by setting a page limit (e.g., 250 pages) or a word limit (e.g., 65,000 words).

Discussion Questions:

- a. What is your perspective on the changes being considered to limit the length of official plans?
 - The City does not support this proposed change, as imposing a page or word limit represents an arbitrary and ineffective means of managing the contents of an official plan. Such a restriction fails to account for the complexity, quantity, and quality of policies required to address the unique planning context, growth pressures, and community priorities within each municipality.
- b. Should there be different limits placed on different types of municipalities (e.g., based on population size)?
 - If a limit were to be imposed, it should consider the stages of growth a municipality is in, as planning for new growth and development in greenfield areas are significantly different than urbanizing or intensification based growth. In the case of Brampton, both contexts have to be considered through the policies drafted and therefore require multiple sets of policies to address different planning contexts.
- c. Are there other approaches that could be used to limit the length of official plans?
 - There should not be an approach considered to limit the length of official plans. Ensuring the regular update and review of Official Plans help to reduce outdated policies and planning directions, which can be collaboratively undertaken between Brampton staff and provincial staff.

C. Creating Permissive Land Use Designations

Currently, land use designations vary from one municipality to the next and some official plans have over 30 different land use designations. The government is proposing to standardize the number and type of land use designations, as well as make designations more permissive across Ontario's official plans.

1. **Residential I:** Designated for low-rise/density residential buildings. Permits special needs housing, small-scale commercial uses (e.g., home businesses, neighbourhood convenience stores) and institutional uses (e.g., schools, places of worship, libraries, recreation centres).
2. **Residential II:** Designated for mid-rise/density residential buildings. Permits special needs housing, commercial uses and institutional uses (e.g., schools, colleges and universities, hospitals, places of worship, libraries, recreation centres).
3. **Mixed Use Areas I:** Designated for low/mid-rise/density buildings, including village or neighbourhood centres (local-scale mixed uses). Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-

scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects.

4. **Mixed Use Areas II:** Designated for high-rise/density buildings, including urban centres, transit station areas. Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels, entertainment) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects.
5. **Rural Areas:** Designated for low-rise/density rural and related uses and small-scale employment/industrial uses. Permits low density residential, small-scale commercial uses (e.g., home businesses/ industries), small-scale employment/industrial uses, agricultural and agricultural-related uses, tourism, resource uses, cemeteries, etc..
6. **Employment Areas:** Designated for clusters of buildings and lands for business and economic uses that may require separation from some sensitive uses. Permits business and economic uses, including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities.
7. **Major Facilities:** Designated for industrial and infrastructure land uses (other than employment areas) that require separation from sensitive uses. Permits uses including manufacturing, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities.
8. **Parks and Open Space:** Designated for recreation and public open space. Permits recreation uses, public realm amenities including active parks, passive open space, and waterfront parks.
9. **Natural Heritage:** Designated for the conservation of ecological features and functions, including core natural areas and linkage areas. Permits environmental protection areas, and identifies areas where development is not permitted, such as natural hazards.
10. **Agricultural Areas:** Designated for agriculture and agriculture-related uses to preserve farmland and support the agricultural system, including prime agricultural lands. Permits agricultural and agriculture-related uses, as well as on-farm diversified uses (agri-tourism, value-added products, etc.).

Discussion Questions:

- a. What is your perspective on the changes being considered to standardize the number and type of land use designations?
 - The City currently utilizes several of the land use designations proposed by the Province. However, staff seek clarification on whether the associated policies will be strictly prescribed by the Province or if municipalities will retain the ability to refine and tailor policies within each designation to reflect local conditions and planning objectives.
 - Overall, the City does not support the full standardization of land use designations and policies across all municipalities. Each community has a distinct planning context, including variations in built form, infrastructure capacity, growth patterns, and community priorities. These local nuances must be reflected through a municipality's planning framework to ensure that land use policies are responsive, context-sensitive, and effective in achieving complete communities.

- b. Would standardized land use designations between upper-tier and lower-tier official plan improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier official plans in land use designations?
- The City intends to repeal the Region of Peel Official Plan and, therefore, would not need to standardize anything. However, in the past, this was not a point of concern as a lower tier official plan conforms to the Regional official plan.
- c. Are there additional designations that would be required? Are there opportunities to streamline or further combine some of the proposed designations (e.g. Residential I and II, and Mixed Use I and II)?
- The addition of Residential III – Hamlet is recommended for those communities that require recognition of their unique attributes/characteristics and a narrower scope of permitted land uses and building types.
 - The proposed land use designation labeled “Natural Heritage” should be updated to “Natural Heritage System” to more accurately reflect the ecological systems-based approach endorsed by Ontario’s planning frameworks, rather than a limited feature-based perspective. This designation must encompass the full spectrum of natural heritage features, not solely “core natural areas”, as currently implied. Examples of where development is not permitted in this lands use designation should also be expanded from solely referencing natural hazards to also include significant natural heritage features.
 - No, the City does not support combining proposed designations further. In addition, the City supports the province looking at another ‘Mixed Use Employment’ land use designation that is focused on creating jobs (office and commercial) and limited residential uses that would only be permitted subject to a city-initiated study (as opposed to permitting residential uses as-of-right, like what is currently proposed through the Mixed-Use designations). This will help to ensure the City’s employment targets and forecasts are achieved while creating flexibility to introduce residential uses, where appropriate, such as in Major Transit Station Areas.
- d. Are there implications to making land use designations more streamlined and permissive?
- Yes, there are implications to making land use designations more streamlined and permissive, as it does not consider the context specific needs of a municipality or Council direction. For example, there are locations where the City is focused on protecting a percentage of office and other denser employment or commercial uses within a mixed use context. Providing a designation that would enable municipalities to protect for these types of uses is critical to deliver jobs to municipalities, not solely relying on the market to deliver a mix of uses within a mixed use context. At the City, we developed a mixed use commercial designation, which identifies commercial as a predominant use or %/GFA based on a market study submitted by a proponent. This policy framework enables a mix of uses, while still ensuring critical services, amenities and jobs are delivered to the municipality.
- e. Are there land use designation terminology or descriptions that would be easier to understand?
- The City seeks clarification on definitions for low, medium and high rise/density to determine if this aligns with the City’s existing heights framework.

- Instead of residential I, the City uses the term “Neighbourhoods” to help capture the mix of uses permitted within residential areas beyond low rise housing typologies. As the City is focused on delivering 15-minute neighbourhoods, the term is important to recognize the full range of uses required to support walkable, complete communities.

D. Transitioning to a New Framework

In some instances where new land use planning rules are enacted, provisions are included to facilitate an orderly transition to the new rules. The government is considering approaches to transition including:

- Requiring new official plans to comply with a new official plan framework at their next 5- or 10-year update, as required by the *Planning Act*
- Requiring that lower-tier municipalities wait until the upper-tier municipality with planning responsibilities have completed their transition before they update theirs
- Setting a date for official plans to comply with a new official plan framework, for example, within 2 years of a new framework coming into force, or
- Requiring large and fast growing to update their official plans within 2 years of a new framework and allowing smaller and rural municipalities to update their official plan at their next 5- or 10-year update

Discussion Questions:

- a. What is your perspective on the changes being considered to transition to a standardized official plan framework?
 - Overall, City staff do not support the changes being considered to standardize official plans. Municipalities already benchmark and produce Official Plans that are structured in a user-friendly and easy to use manner that are comparable to other municipalities to be consistent and standardize, where appropriate.
 - Any transition to a new official plan framework should wait until the next official plan 5- or 10-year update timeline, at a minimum, enabling in effect Official Plans recently approved be in effect for a period of time. Requiring transition sooner, such as the proposed 2 year timeline, would overburden staff and resources particularly for municipalities that recently completed an Official Plan Review exercise.
- b. What is a realistic implementation timeline for your municipality to update its official plan to comply with a standardized framework (e.g., structure, land use designations, page/word limits), and why? Please consider staffing, council cycles, data/mapping updates, public engagement, and statutory review requirements in your response.
 - It would be a multi-year process, likely between 3-5 years at a minimum, to complete a comprehensive review of this nature under the *Planning Act* process for an Official Plan review.
- c. How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?
 - Staff would require guidance materials and access to key provincial staff contacts to understand and implement this significant change in direction.
 - Clarity is required regarding whether this type of transition would be completed under an existing section of the *Planning Act* (e.g. Section 26), or whether any new statutory process will be proposed.

E. Submission of Official Plans through Online Portal

Regulations under the Planning Act specify the way information and material can be submitted to the Ministry of Municipal Affairs and Housing as part of a planning matter (e.g., by personal service, mail, fax or email). In line with the digital-first approach, the government is considering regulatory changes to allow the submission of official plan information and documents to the Ministry of Municipal Affairs and Housing through an online portal.

Discussion Questions:

- a. Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?
 - The City does not take issue with shifting toward an online portal for submitting official plan information or revisions for Provincial review and comment.
- b. What benefits and/or risks do you foresee from transitioning to submission through an online portal?
 - There are a number of benefits to shifting to an online portal system in terms of ease of access and more up-to-date framework for processing information. An online portal streamlines submission, review, and tracking of applications, reducing paper handling and improving turnaround times. An online portal may also help to track revisions or any inter-governmental correspondence of larger documents, which would not be able to occur over email.
 - The risks would be around technical capacity or concerns of privacy/data breaches, as well as ensuring the portal can effectively integrate with the City's systems. To support the transition, technical staff would be important to hire to support the use of the portal and train municipalities how to use it.