

## Appendix K

April 29, 2026

Environmental Registry of Ontario  
Ministry of Municipal Affairs and Housing

777 Bay Street, 2nd Floor  
Toronto, ON M7A 2J3

### **Subject - Consultation on upper-tier official plans, secondary plans and site and area specific policies ERO Posting 026-0315**

Thank you for the opportunity to comment on proposed changes relating to simplifying and standardizing official plans for upper-tier municipalities, secondary plans and site- and area-specific policies. Please find the City's comments and responses to the discussion questions below.

#### **Discussion Questions:**

##### Secondary Plan and Site- and Area-Specific Policies

**Question:** *Which types of areas are most appropriate for the use of secondary plans (i.e. new neighbourhoods, growth areas, settlement areas, employment areas, and/or areas where there are land use compatibility concerns)? Are there additional types of areas or policy objectives that should be eligible or prioritized?*

**City Response:** Any area in a municipality requiring greater planning study due to significant development or redevelopment pressures, which may include greenfield areas, key intensification nodes or growth areas, are locations where secondary plans are most appropriate. The purpose is complete greater planning evaluation and analysis to support hard and soft infrastructure delivery in that area and meet the vision set out through the PPS 2024 and local official plan to deliver context-sensitive, complete communities.

Secondary plans are particularly valuable where there is a need to align land use, density, built form, transportation, and servicing strategies to support complete, context-sensitive communities. They provide the necessary policy direction to coordinate the timely delivery of both hard and soft infrastructure, including transportation networks, parks, schools, childcare, places of worship and community services, while ensuring

financial and phasing considerations are addressed. There should be no limitations on where secondary plans can be utilized, and should be left to the municipality to determine areas of prioritization based on local, contextual needs.

**Question:** *What benefits or challenges, if any, might you anticipate if municipalities had the option to organize secondary plans as standalone documents, while still being subject to the same Planning Act processes that apply to official plans (e.g., notification, public meetings, appeals)?*

**City Response:** The City seeks clarity on what implications there are if Secondary Plans are to be organized as a standalone document from the Official Plan, while still being subject to the *Planning Act* process. Functionally, the City locates Secondary Plans separately on the City's webpage from the Official Plan (i.e., Secondary Plans are not located at the end of the Official Plan download page, despite being a part of the Official Plan). Until impacts of this change are understood, the City cannot comment on any benefits or challenges at this time.

**Question:** *Looking ahead, how would a future framework support the ongoing applicability of existing secondary plans and SASPs? Are there any considerations we should keep in mind about how these documents are maintained or updated over time? Should we establish principles to evaluate and transition existing secondary plans and SASPs to a new framework, and if so, what should these principles include?*

**City Response:** The City continually reviews and updates its policy framework, when required, inclusive of Secondary Plans. The City utilizing its own principles, based on build out, conformity to the Official Plan, changes in direction for an area, etc. to transition existing secondary plans and SASPs. A new framework is not required, as the City maintains and updates Secondary Plans, as required.

**Question:** *Would you support exempting secondary plans from Ministerial approval (except for lower-tier municipalities within an upper-tier municipality with planning responsibilities)? What advantages or risks do you anticipate with this approach?*

**City Response:** Yes – the City does not foresee any risks with exempting secondary plans from Ministerial approval and support the proposed change. A thorough and robust process is undertaken through Secondary Plan Reviews, inclusive of stakeholder and public engagement, including consultation with upper levels of government (such as an Environmental Assessment process for Transportation Master Planning or a Subwatershed Study). The City does recognize the benefit of sheltering from appeals, which the appeals process significantly delays implementation of Secondary Plans if there is time sensitive redevelopment happening in the near-term. Reducing capacity for these Plans to be subject to years-long OLT hearings is a potential benefit that would save the City and taxpayers significant public funds (e.g., third party legal fees, staff

time and resources, expert witnesses, etc.). Providing an option for Provincial approval in these instances may be helpful to ensure implementation of priority Secondary Plans expeditiously, saving time and

**Question:** *What level of flexibility should municipalities retain to effectively implement, update, and maintain secondary plans under the proposed framework?*

**City Response:** The City supports municipalities having full flexibility to implement, update and maintain secondary plans. The City is undertaking a process to repeal outdated Secondary Plans, which ensures that out-of-date policy frameworks are effectively removed when no longer required.

#### Upper-Tier Official Plans

**Question:** *In addition to considering a combined “Community Areas” use designation described above, are there other designations that would be useful for upper-tier official plans that would help avoid duplication with lower-tier official plans?*

**City Response:** As the City intends to repeal the Region of Peel Official Plan, and as the Region of Peel no longer has planning authority, the City has no comment on this proposed change.

**Question:** *Are there any parts of the standardized table of contents, schedules, and land use designations outlined in ERO 025-1099 that would need to be modified or would not apply to official plans for upper-tier municipalities?*

**City Response:** No comment.

**Question:** *Are there other considerations we need to take into account regarding the proposed framework for upper-tier official plans?*

**City Response:** No comment.

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

Sincerely,

**Steve Ganesh, MCIP, RPP**  
Commissioner  
Planning, Building and Growth Management  
City of Brampton