



**Report**  
**Staff Report**  
 The Corporation of the City of Brampton  
 5/1/2024

**Date:** 2024-04-26

**Subject:** **Recommendation Report for City Comments on the Proposed Provincial Planning Statement, 2024**

**Secondary Title:** **Proposed amendments by the Ontario Government to integrate the Provincial Policy Statement, 2020 and A Place to Grow: The Growth Plan for the Greater Golden Horseshoe into a new Provincial Planning Statement**

**Contact:** Jessica Yadav, Planner I, Integrated City Planning  
 Henrik Zbogar, MCIP, RPP, Director, Integrated City Planning

**Report number:** Planning, Bld & Growth Mgt-2024-394

**RECOMMENDATIONS:**

1. That report from Jessica Yadav, Planner I, Integrated City Planning to the City Council Meeting of May 1, 2024, re: **Recommendation Report for City comments on the Proposed Provincial Planning Statement, 2024**, be received;
2. That Staff be directed to submit detailed comments based on concerns and proposed recommendations contained in this report to the Province; and
3. That the City Clerk forward this report to the Ministry of Municipal Affairs and Housing; Brampton's Members' of Provincial Parliament; the Association of Municipalities of Ontario; and the Region of Peel.

**OVERVIEW:**

- On April 6, 2023, the provincial government introduced Bill 97 which proposes to integrate the Provincial Policy Statement, 2020 (PPS 2020) and A Place To Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) into a new Provincial Planning Statement.
- On April 10, 2024, the provincial government introduced a revised Provincial Planning Statement (PPS 2024) based on feedback received

during the previous consultation period on the proposed Provincial Planning Statement, 2023.

- The revised PPS 2024 continues to propose significant changes to the provincial planning framework.
- The provincial government is currently soliciting comments on the proposed PPS 2024 through posting #019-8462 on the Environmental Registry of Ontario (ERO) to which the City will be responding prior to their commenting deadline of May 12, 2024.
- Key proposed changes to the PPS 2020 and the Growth Plan include:
  - Removal of urban growth centres;
  - Removal of requirement for Municipal comprehensive reviews in connection with employment conversions and settlement area boundary expansions;
  - Reduced direction and policies on responding to climate change and protecting the Natural Heritage System;
  - Removal of mandatory minimum density target requirements in settlement areas for designated growth areas, and strategic growth areas (other than Major Transit Station Areas); and,
  - Removal of Provincially Significant Employment Zones.

## BACKGROUND:

On April 6, 2023 the provincial government introduced Bill 97 the *Helping Homebuyers, Protecting Tenants Act, 2023* which proposed significant changes to the provincial planning framework and land use approvals system and increased support for renters in Ontario. Bill 97 proposed the integration of the *Provincial Policy Statement, 2020* (PPS 2020) and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (Growth Plan) into a new *Provincial Planning Statement* (PPS 2023). Staff reported to Council on the proposed PPS 2023 on May 31<sup>st</sup>, 2023, and submitted Council-endorsed comments on behalf of the City to the Province before the provincial commenting deadline of June 15, 2023.

Since then, on April 10, 2024, the provincial government introduced a revised *Provincial Planning Statement* (PPS 2024) based on feedback received during the previous consultation period on the proposed PPS 2023. The revised PPS 2024 was introduced concurrently with Bill 185, the *Cutting Red Tape to Build More Homes Act, 2024* which builds on Bill 97 and is part of the Province's red tape reduction package to meet their goal of facilitating the construction of 1.5 million new homes by 2031.

The Province of Ontario is currently soliciting comments on the proposed policy changes through posting #019-8462 on the Environmental Registry of Ontario to which the City will be responding, with a commenting deadline of May 12, 2024.

**CURRENT SITUATION:**

This report focuses on the latest revised *Provincial Planning Statement* (hereinafter referred to as the “PPS 2024”) associated with ERO posting #019-8462:

**Review of proposed policies for a new provincial planning policy instrument.**

As the *Provincial Policy Statement 2020* and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* provide the minimum policy standards to which planning in Brampton must be held, these policy changes have a direct impact on the creation of complete communities across the city. These proposed changes and consolidation of these two planning documents into one represents a significant shift in the policy framework that guides major planning decisions.

Outlined below is a summary of the most significant proposed changes, their implications for Brampton, and staff’s comments. The revisions to PPS 2023 address some of the City’s concerns submitted to the Province in June 2023, but many remain.

Proposed Change	Implications to the City	City Comment
<p><b>Municipal Comprehensive Review (MCR)</b></p> <p>The concept of MCRs has not been carried forward from the Growth Plan.</p>	<p>Comprehensive Reviews provide a clear process for an official plan review or amendment to evaluate long-term growth projections, consider how to best accommodate this growth in the city, plan for the relevant services and infrastructure needed to accommodate growth, and evaluate cross-jurisdictional issues to ensure complete communities across regions.</p>	<p><b><i>The City continues to recommend the maintenance of the MCR process, ensuring that projections are effectively evaluated with proper assessment of the existing land budget, prioritization of compact development through infill and intensification, efficient and effective infrastructure planning, as well as the coordination of delivery of public services and facilities.</i></b></p>
<p><b>Settlement Area Expansions</b></p> <p>Municipalities will be able to consider settlement area expansions at any time outside of MCRs. The tests to be applied for expansions are not as stringent as they were, and there is no limitation on the ability of landowners from applying for an expansion.</p> <p>Further, Bill 185 proposes changes to the <i>Planning Act</i> that would remove limitations for landowners to appeal the refusal of such applications unless, as a result of the alteration, any land in the Greenbelt</p>	<p>Depending on the outcomes of the dissolution of the Region of Peel and impacts to servicing, settlement area boundary expansion of other neighboring municipalities could impact the cost Brampton residents have to bear. This is a major consideration as each municipality would have control over their expansion rather than being required to go through the formal MCR process.</p>	<p><b><i>The City continues to recommend maintaining the existing policies regarding the timing of settlement area expansions to be limited to MCRs in order to comprehensively evaluate the overall impacts of expansion, future growth, and intensification to long-range planning exercises.</i></b></p>

<p>Area, would be included in the area of settlement.</p>		
<p><b>Large and Fast-Growing Municipalities (LFMs)</b></p> <p>This was a new term in the PPS 2023 and continues to apply in the PPS 2024, defined through a list of municipalities that qualify, including the City of Brampton. The list includes the same municipalities required to commit to a Municipal Housing Pledge</p> <p>LFMs will be encouraged to plan for a density target of 50 residents and jobs per gross hectare for designated growth areas.</p>	<p>The Growth Plan and PPS 2020 contained specific intensification targets which required municipalities to plan for a certain amount of growth within settlement areas. The PPS 2024 supports intensification generally, but with no specific targets to be met. For designated growth areas, it would encourage Brampton to meet the 50 residents and jobs per hectare density target rather than a requirement to meet this target.</p>	<p><b><i>The City continues to recommend that the Growth Plan policies that provide clear targets for growth be required rather than encouraged in the proposed PPS 2024 to ensure compact, complete and sustainable communities across Brampton and Ontario.</i></b></p>
<p><b>Designated Growth Areas</b></p> <p>The concept of Designated Growth Areas has been carried forward from the PPS 2020 and from the Growth Plan (in which it is called “Designated Greenfield Area”). This concept was previously excluded in the PPS 2023.</p> <p>LFMs are encouraged to plan for a density of 50 residents and jobs per gross hectare in designated growth areas.</p>	<p>The City is supportive of carrying forward the concept of designated growth areas and setting minimum density targets for planning authorities to plan towards in those areas. However, the policy language simply “encourages” planning authorities to plan for those densities rather than requiring it, as it did in the Growth Plan.</p> <p>This creates implications for municipalities justifying intensification and higher density development within the DGA.</p>	<p><b><i>The City recommends requiring, rather than simply encouraging, planning authorities to plan for minimum density targets within Designated Growth Areas.</i></b></p>

<p><b>Urban Growth Centres</b></p> <p>The concept of Urban Growth Centres (UGC's) has not been carried forward from the Growth Plan.</p>	<p>With the removal of Urban Growth Centres, the associated minimum density targets are also removed. For Brampton, the Downtown Brampton UGC was required to be planned for a minimum density of 200 residents and jobs per gross hectare. Under the PPS 2024, planning authorities will no longer be required to plan towards specific density targets in key locations, such as the downtown area.</p> <p>Municipalities require minimum density targets to support efforts for intensification and redevelopment to create more housing and jobs to align with the Province's housing goals.</p>	<p><b><i>The City recommends maintaining Urban Growth Centres and the associated minimum density targets to promote intensification and growth.</i></b></p>
<p><b>Employment Policies</b></p> <p>Municipalities can consider (and landowners can apply for) the removal of land from employment areas. The tests to be met include establishing that there is a need for the removal, and that the land is not required for employment uses over the long term.</p> <p>Provincially Significant Employment Zones will no longer exist with the repeal of the Growth Plan.</p>	<p>In the absence of requirements for a comprehensive process and mandatory targets to be met with the proposed repeal of the Growth Plan, employment conversions will not be evaluated holistically through a MCR but will be evaluated on a case-by-case basis, as requests come in. This places a risk to Brampton's integral employment lands, as long-term uses and impact to the integrity of the employment land base is difficult to evaluate on a one-off basis and outside a comprehensive</p>	<p><b><i>The City continues to recommend maintaining the current conversion requirements, limiting conversion or removal of employment lands to a MCR.</i></b></p> <p><b><i>Furthermore, the City continues to request the maintenance of Provincially Significant Employment Zones to protect critical employment lands in the city.</i></b></p>

	<p>review of planning for long-term growth. The <i>Planning Act</i> continues to limit the ability to appeal refusals or non-decisions of such applications, however Bill 97 proposed to change the definition of employment areas in the <i>Planning Act</i> and Bill 185 continues to propose the change in the new PPS. The focus is on uses that cannot locate in mixed use areas, such as heavy industry, manufacturing and large-scale warehousing.</p>	
<p><b>Strategic Growth Areas</b></p> <p>Planning authorities are encouraged to identify and focus growth and development in Strategic Growth Areas (SGAs)</p> <p>The definition of SGA has also been revised to include “existing and emerging downtowns, and land adjacent to publicly assisted post-secondary institutions”</p>	<p>The Growth Plan required municipalities to identify strategic growth areas to support the achievement of intensification targets. The PPS 2023 carried forward this concept and required LFMs to identify Strategic Growth Areas and set minimum density targets for each SGA.</p> <p>The PPS 2024 simply encourages planning authorities to identify SGAs and does not require or encourage density targets to be set for SGAs.</p> <p>The addition of existing and emerging downtowns in the SGA definition seems to be an attempt to reconcile the removal of Urban Growth Centres, many of which were existing and emerging downtown areas. While these</p>	<p><b><i>The City recommends maintaining the Growth Plan requirement for municipalities to identify SGAs and set minimum density targets for each SGA to support intensification.</i></b></p> <p><b><i>The City recommends that the concept of Urban Growth Centres, many of which were existing and emerging downtown areas, remain as well as their associated minimum density targets.</i></b></p>

	<p>areas are now included as SGAs, the mandatory minimum density targets that applied to UGCs are not carried over to apply to SGAs. Thus, a gap exists in how planning authorities are directed to plan for growth in UGCs.</p>	
<p><b>Housing</b></p> <p>Policies in the Growth Plan which direct planning authorities to establish targets for affordable ownership housing and rental housing have not been carried forward in the PPS 2024.</p>	<p>Affordable and rental housing are critical housing options that Brampton needs in order to ensure a full mix and range of housing options in the city.</p> <p>The removal of the requirement to establish targets for affordable ownership housing and rental housing will impact the City, as these targets help to identify key intentions to deliver a full mix and range of housing options based on resident needs, providing key performance indicators for the development industry in supporting the delivery of “a full mix and range of housing options.”</p>	<p><b><i>The City continues to recommend</i></b> carrying over all housing policies from the Growth Plan as they relate to the provision of and planning for affordable housing and rental housing.</p>
<p><b>Climate Change</b></p> <p>General policies requiring municipalities to plan for climate change are significantly reduced.</p>	<p>The Growth Plan places sustainability and addressing climate change as a key principle throughout its policy framework for guiding growth and development, which should be reflected in the PPS 2024. Although the City recognizes the Province’s efforts to streamline climate change policies by creating a separate section for them, the City notes that, in doing so,</p>	<p><b><i>The City continues to recommend</i></b> integrating climate change policies through the PPS 2024 that reflect the directions found in the PPS 2020 and Growth Plan, ensuring sustainable development patterns, require alternative and renewable energy systems are implemented, work to</p>



	key policies have been weakened or removed and opportunities to strengthen policy have not been addressed.	<i>improve air quality and reduce greenhouse gas emissions, while ensuring climate risks, vulnerabilities and opportunities for adaptation are assessed and implemented through local official plans.</i>
<b>Natural Heritage System</b> The Growth Plan policies and mapping related to the Natural Heritage System (NHS) have not been carried forward into the PPS 2024.	The lack of NHS-related mapping and policies will cause a loss of connectivity and increased disruptions to the greater NHS system as municipalities may adopt different methodologies to identify the NHS system.	<p><b><i>The City continues to recommend that NHS-related policies and mapping from the Growth Plan be carried forward into the PPS 2024.</i></b></p> <p><b><i>The City continues to request that further information be provided to understand the full impacts of the revocation of the Growth Plan on Natural Heritage System mapping to prevent erosion of the NHS as a whole.</i></b></p>

#### Loss of Key Direction from the Growth Plan:

The removal of the Growth Plan will result in a significant loss of foundational direction for managing growth throughout the Greater Golden Horseshoe as one of the fastest growing regions in North America, compromising the vision for this geographic area in supporting a sufficient housing supply, strong economy, an integrated transportation network, and a healthy natural environment, while responding to the impacts and planning for a changing climate. The Growth Plan builds on the overall policy direction in the PPS 2020, providing more specific guidance and direction to municipalities to manage growth efficiently, effectively, safely and sustainably.

The Growth Plan is read in conjunction with other provincial plans, specifically the Greenbelt Plan in the Brampton context, providing detailed requirements that guides planning decision-making in the city in support of Brampton's urban future. The Growth Plan seeks to reconcile how planning for complete communities can occur across the area, providing a forecast and land needs assessment methodology to determine how to accommodate growth and effectively plan for it in a coordinated manner. It also ensures the appropriate hard and soft infrastructure, modal share for transit, and active transportation while minimizing land consumption through compact built form through both intensification and greenfield development.

The Growth Plan provides direction that aligns with the compact, sustainable and vibrant urban future for Brampton set forth through the 2040 Vision and draft Official Plan – Brampton Plan. The City supports additional policies from the Growth Plan be integrated into the proposed PPS 2024 to enshrine this direction from the Province through policy to facilitate sustainable and efficient growth through intensification.

## **CORPORATE IMPLICATIONS:**

### **Financial Implications:**

There are no direct financial implications from this report. However, additional staff and consultant time will need to be allocated to align to the new directions from Bill 185 to ensure Brampton Plan is consistent with new provincial direction.

### **Economic Development Implications:**

Economic Development is concerned that the proposed changes will weaken the City's ability to protect critical employment lands and jobs. These changes are likely to increase speculation on employment lands that currently do not allow housing. The current ratio of population to employment in Brampton is concerning and the proposed changes may exacerbate the situation. Provincially Significant Employment Lands and the municipal comprehensive review work together to provide layers of protection for lands that are critical for retention, attraction and expansion.

Buffer and transition zones need to be recognized as important elements to reduce conflicts from heavy industrial uses that may produce noise, traffic and other impacts that may disturb residential or sensitive land uses. Older employment lands have recently shown signs of regeneration and reinvestment, resulting in greater employment yields. These lands provide the opportunity for cheaper and more accessible options for immigrants and new entrepreneurs to find jobs and start a business.

### **Legal Implications:**

Under the legislative and policy changes, the City will be taking on increased responsibility for its official plan and for matters such as employment conversions, growth forecasting, and related matters.

### **STRATEGIC FOCUS AREA:**

The proposed PPS 2024 will have impacts upon numerous Strategic Focus Areas, including the following:

- **Growing Urban Centres & Neighbourhoods:** Impacts to growth, intensification, and development
- **Environmental Resilience & Sustainability:** Impacts to climate change and green development policies
- **Government & Leadership:** Impacts to provincial direction on key matters and to City processes

### **CONCLUSION:**

The City of Brampton supports the provincial effort to create more housing. As an ongoing partner in supporting the delivery of a full mix and range of housing options, the City continues to implement recommendations from “Housing Brampton” - Brampton’s first housing strategy, including the provision of affordable housing and rental housing, as well as other projects to improve the City’s effectiveness through the end-to-end development review process.

The City recognizes the Province’s efforts to streamline provincial policy documents and reduce duplication by integrating elements of the Growth Plan into the proposed Provincial Planning Statement. However, the City recognizes the significant impact of the loss of the Growth Plan and recommends through this report that additional policies and planning frameworks be integrated into the proposed Provincial Planning Statement, 2024.

The City is committed to working with the Province to overcome challenges and work towards their ambitious goal of delivering more housing, while ensuring the creation of complete communities across Brampton. This ensures sustainable growth and development, the efficient use of services, integrating multi-modal transportation options and prioritizing public transit investment, planning and protecting for key employment across the city, while ensuring the full mix of community amenities, parks, open spaces and cultural heritage is preserved, maintained and expanded with this new housing growth.

Given the potential economic, social, and environmental impacts, it is recommended that the Province continue further dialogue with municipal partners like the City of

Brampton prior to final approval of the proposed policy changes. This will result in a more balanced and strategic plan aligned with provincial and municipal outcomes as identified through this report.

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