



Report
Staff Report
 The Corporation of the City of Brampton
 9/23/2024

Date: 2024-09-06

Subject: Information Report – Provincial Planning Statement, 2024

Secondary Title: Summary of changes by the Ontario government to integrate the Provincial Policy Statement, 2020 and A Place to Growth: The Growth Plan for the Greater Golden Horseshoe into the new Provincial Planning Statement, 2024

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Report number: Planning, Bld & Growth Mgt-2024-720

RECOMMENDATIONS:

1. That the report from Jessica Yadav, Planner I, Integrated City Planning to the Planning & Development Committee Meeting of September 23, 2024, re: **Information Report – Provincial Planning Statement, 2024**, be received;
2. 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; City of Mississauga, Town of Caledon and the Region of Peel.

OVERVIEW:

- On April 6, 2023, the provincial government proposed 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 draft *Provincial Planning Statement, 2023*.
- On April 10, 2024, the provincial government proposed a revised draft *Provincial Planning Statement* based on feedback received during the previous consultation period on the proposed *Provincial Planning Statement, 2023*.
- On August 20, 2024, the provincial government formally introduced the final *Provincial Planning Statement, 2024*, under the *Planning Act*, to come into effect on October 20, 2024.

- **The PPS 2024 proposes significant changes to the provincial planning framework.**
- **Key proposed changes to the PPS 2020 and the Growth Plan include:**
 - **Transferring growth forecasting responsibilities from upper tier to lower tier municipalities with opportunity for greater flexibility;**
 - **Removal of urban growth centres;**
 - **Removal of the 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* and a related proposal 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 draft *Provincial Planning Statement* (PPS 2023). Staff reported to Council on the proposed PPS 2023 on May 31, 2023, and submitted Council-endorsed comments on behalf of the City to the Province before the provincial commenting deadline of June 15, 2023.

On April 10, 2024, the provincial government introduced a revised draft *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.

Staff reported to Council on the revised PPS 2024 on May 1, 2024, and submitted Council-endorsed comments on behalf of the City to the Province before the provincial commenting deadline of May 12, 2024.

On August 20, 2024, the provincial government introduced the final PPS 2024, under the *Planning Act*, which is intended to reflect feedback received during the previous consultation and aims to provide municipalities with enhanced tools and flexibility to meet housing targets while addressing local challenges and priorities. The PPS 2024 will officially come into effect on October 20, 2024.

CURRENT SITUATION:

This report provides a summary of changes in the provincial policy framework through the new *Provincial Planning Statement* and their impacts to the City of Brampton.

The *Provincial Policy Statement 2020* and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* provided the minimum policy standards to which planning in Brampton had to adhere. The policy changes being introduced through the new PPS 2024 may affect the ability and efficacy of creating complete communities across the city, as the minimum policy standards previously provided through the PPS 2020 and Growth Plan are now mostly being relaxed and streamlined (with the opportunity for the City to continue to exceed the minimum standards).

There are no immediate foreseen impacts identified to the City's Official Plan or planning responsibilities as a result of the PPS 2024. However, the proposed changes and consolidation of these two planning documents into one represents a significant shift in the policy framework that guides major planning decisions.

Feedback integrated into PPS 2024 based on City comments:

The revisions made by the Province to the draft PPS 2024 in response to previous consultation are minimal and address some of the City's concerns submitted to the Province in June 2023 and May 2024, but many remain. Outlined below are the key changes made between the proposed draft PPS 2024 and the final PPS 2024 and their connection to the City's comments:

Key Revision from Draft PPS 2024	City's Comments
<p>Minimum targets for intensification and redevelopment Previously, it was proposed that planning authorities would only be encouraged to establish and implement minimum targets for intensification and redevelopment within built-up areas. The final PPS 2024 now requires planning authorities to do so.</p>	<p>✓ This revision effectively addresses comments previously submitted by the City. The required minimum targets for intensification and redevelopment within built-up areas will support the City's efforts towards intensification as set out in Brampton Plan.</p>
<p>Impacts to economic viability A new policy has been added that requires development on lands within 300 metres of employment areas to avoid where possible or minimize and mitigate potential impacts to long-term economic viability of</p>	<p>✓ This revision effectively addresses comments previously submitted by the City which advocated for increased protection of employment areas to ensure the long-term</p>

employment uses within existing or planned employment areas.	economic growth and development of the city.
<p>Additional Residential Units in Prime Agricultural Areas</p> <p>Clarification of existing policy that where two ARUs are proposed on a lot, one of the ARUs must be self-contained or attached to the primary dwelling.</p>	<p>✓ The City has not previously commented on this policy as there are no prime agricultural areas in Brampton.</p>
Definitions	
<p>Agricultural impact assessment</p> <p>Definition was strengthened to apply to the agricultural system (and not only “where applicable”) rather than “agricultural lands and operations”.</p>	<p>✓ The City has not previously commented on this definition, however the strengthened definition will help protect agricultural lands.</p>
<p>Higher order transit (HOT)</p> <p>Removes “regional inter-city rail” as an example of higher order transit.</p>	<p>✗ The City has not previously commented on this definition. The removal of regional inter-city rail from this definition does not align with the City’s Transit Hierarchy in Brampton Plan, which mentions inter-city rail as an example of HOT.</p>
<p>Housing options</p> <p>Addition of “affordable housing” as a type of housing form.</p>	<p>✓ This revision effectively addresses comments previously submitted by the City.</p>
<p>Minerals</p> <p>Removal of “asbestos” as an example of an industrial mineral.</p>	<p>✓ The City has not previously commented on this definition and no new impacts are identified at this time.</p>
<p>On-farm diversified uses</p> <p>Language regarding land-extensive energy facilities being permitted in prime agricultural areas has been removed and replaced with language that includes “electricity generation facilities, transmission systems, and energy storage systems” as on-farm diversified uses.</p>	<p>✓ The City has not previously commented on this definition and no new impacts are identified at this time.</p>
<p>Prime agricultural area</p> <p>Clarification regarding which Ministries can provide mapping to identify prime agricultural areas.</p>	<p>✓ The City has not previously commented on this definition and no new impacts are identified at this time.</p>

<p>Waste Management System Generalization of the types of waste that is accommodated.</p>	<p>✓ The City has not previously commented on this definition and no new impacts are identified at this time.</p>
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Key changes between the PPS 2020 & Growth Plan to the new PPS 2024:

Outlined below is a summary of the most significant changes and their implications for Brampton as a result of the Province repealing the PPS 2020 & Growth Plan and introducing the *Provincial Planning Statement, 2024*.

Key Changes	Implications to the City
<p>Growth Forecasts</p> <p>The Province will no longer establish minimum population and employment forecasts. Planning authorities must base population and employment forecasts on the following options, and may modify them as appropriate:</p> <ul style="list-style-type: none"> • Previously established Growth Plan forecasts, OR • Ontario Population Projections published by the Ministry of Finance. 	<p>Minimum population and employment forecasts were previously established by the Province through the Growth Plan for municipalities to implement. Municipalities will now be required to establish forecasts based on Ontario Population Projections published by the Province and are able to modify these forecasts. The City previously requested the Province to provide a standard methodology to ensure consistency in forecasting across municipalities, however this comment was not addressed through the PPS 2024.</p> <p>The lack of consistency in growth forecasting between municipalities can result in challenges with servicing capacity for new growth, skewed funding allocations for municipalities, and offset allocation of growth to urban areas. The Cities of Brampton, Mississauga and Town of Caledon have developed a working group to further examine this and will report back to their respective Council's at a future date.</p>
<p>Municipal Comprehensive Review (MCR)</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. In the absence of MCRs, the City will be required to conduct processes such as employment conversions without the comprehensive and coordinated analysis</p>

	<p>provided for through the MCR process, which presents a risk for the protection of employment lands.</p> <p>Figure 1 below shows that the City is well below the previously established jobs target in the Growth Plan. Now that employment land conversions can be requested at any time, and without the stringent criteria of MCR's, there is a risk that the City will not be able to protect employment lands and will fall short on meeting job targets.</p>
<p>Employment Policies</p> <p>Municipalities can consider (and landowners can apply for) the removal of land from employment areas at any time. 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>The definition of “employment areas” has been revised in the <i>Planning Act</i> and PPS. Notably, primary uses such as retail and office have been excluded from the new definition.</p>	<p>The absence of the MCR process for employment conversions 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 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.</p> <p>The revised definition of employment areas will have implications on how the City is able to protect employment lands, and the types of employment land conversions that are protected from appeal. The implementation of the new definition in combination with existing, lawfully established employment uses under the current definition is not clear.</p>
<p>Settlement Area Expansions</p> <p>Municipalities are 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>Settlement area boundary expansions of other neighboring municipalities could impact the cost Brampton residents have to bear as it relates to servicing through the Region of Peel. This is a major consideration as each municipality will have control over their expansion rather than being required to go through the formal MCR process.</p>
<p>Large and Fast-Growing Municipalities (LFMs)</p> <p>This is a new term in the PPS 2024, defined through a list of municipalities</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</p>

<p>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>generally, but with no specific targets to be met. For designated growth areas, it would simply <u>encourage</u> Brampton to meet the 50 residents and jobs per hectare density target rather than a <u>requirement</u> to meet this target. The softened language can weaken the City’s efforts to achieve higher densities in designated growth areas.</p>
<p>Designated Growth Areas</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 previous drafts of the PPS.</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 challenges for municipalities when justifying intensification and higher density development within the DGA.</p>
<p>Urban Growth Centres</p> <p>The concept of Urban Growth Centres (UGCs) 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>Strategic Growth Areas</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.</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 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>Housing</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.” While the City may choose to maintain targets for affordable ownership housing and rental housing, there will be a lack of justification and support through Provincial policy.</p>
<p>Climate Change</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.</p> <p>Although the City recognizes the Province’s efforts to streamline climate change policies by creating a separate section for them, the</p>

	City notes that, in doing so, key policies have been weakened or removed and opportunities to strengthen policy have not been addressed.
<p>Natural Heritage System</p> <p>The Growth Plan policies and mapping related to the Natural Heritage System (NHS) have not been carried forward into the PPS 2024.</p>	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.

Summary of Implications:

Overall, much of the critical intensification, density, housing, natural heritage targets and mapping that municipalities were required to implement under the previous provincial policy framework have now become optional, and some new responsibilities have been passed down to municipalities. The overall weakening of policies and requirements creates flexibility for municipal planning but removes the layer of support and policy justification on which municipalities could previously rely upon.

The weakening of employment land conversion policies and removal of primary office and retail from the definition of employment areas increases the risk to the City's employment lands and creates greater opportunities for conversion to non-employment uses.

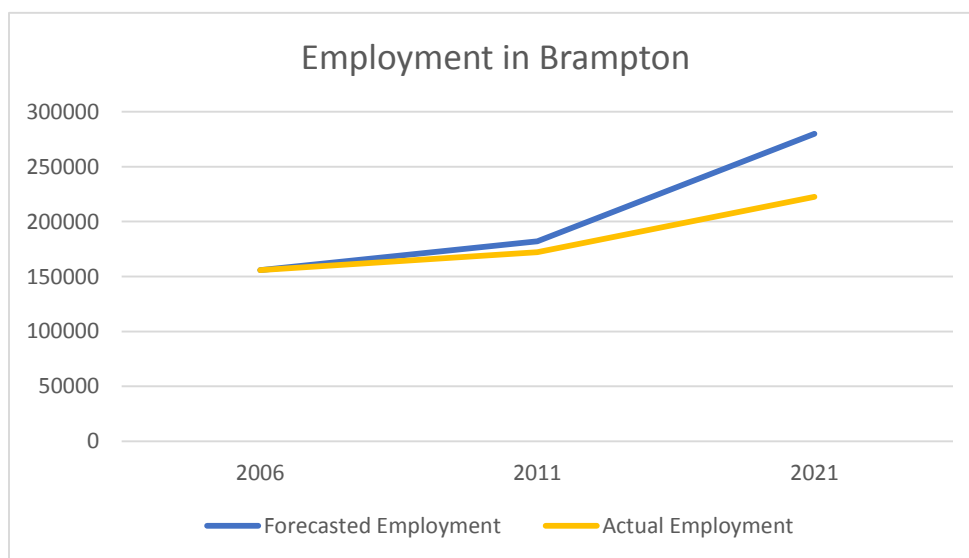


Figure 1. City of Brampton's employment rate compared to employment forecasts.

Figure 1 above illustrates the City's employment rate compared to employment forecasts. The 2006 Official Plan contained employment forecasts based on the Growth Plan, as required under the *Planning Act*, which premised on the City achieving 280,000 jobs by 2021. However, in 2021, the City achieved only about 222,000 jobs.

With the further weakening of employment area policies and definitions, the City's ability to achieve forecasted employment growth will be further reduced due to the greater risk of conversion to non-employment uses under the new policies and definitions surrounding employment areas. The City's findings and analysis thus far have been coordinated with the City of Mississauga and Town of Caledon. Staff will continue to collaborate as all municipalities work to implement the new directions set out by the Province.

Next Steps:

The *Provincial Planning Statement, 2024* is a policy statement issued under subsection 3(1) of the *Planning Act*, and as such, official plans must be consistent with the statement. but there is no requirement to conduct a conformity review. However, Brampton Plan should be revised to be consistent with the PPS 2024 when it is next reviewed, which must occur within ten years of a new official plan coming into effect, as required under the *Planning Act*.

Regardless, once the policy statement comes into effect on October 20, 2024, any decisions of Council must be consistent with the PPS 2024. For this reason, staff recommend initiating a review of Brampton Plan in the near future to ensure consistency with the PPS 2024 and recent changes in planning responsibilities at the Regional level. Staff will report back to Council with a detailed plan prior to initiating a review of Brampton Plan.

Furthermore, staff will determine an approach to address the issue of employment lands that may no longer qualify as protected under the new PPS 2024 and *Planning Act* definition of employment areas.

CORPORATE IMPLICATIONS:

Financial Implications:

There are no immediate financial implications resulting from the PPS 2024. However, funding and additional staff time may need to be allocated to initiate a review of Brampton Plan to ensure consistency with new provincial directions.

Economic Development Implications:

The new PPS articulates the importance of maintaining the long-term economic viability of employment uses within existing and planned employment areas.

As the new Provincial Policy Statement is implemented, EDO will continue to collaborate with the Ontario government and industry partners to further enhance the growth and competitiveness of Ontario's manufacturing sector.

Further, staff note that the current ratio of population to employment in Brampton is concerning and a number of changes through the PPS 2024 may exacerbate the situation. Provincially Significant Employment Lands and the municipal comprehensive review, which are no longer carried forward, 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 lands conversions, growth forecasting, and related matters.

STRATEGIC FOCUS AREA:

The new 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 and recognizes the provincial effort to create more housing, streamline provincial policy documents, and reduce duplication by integrating elements of the Growth Plan into the Provincial Planning Statement, 2024. However, the City recognizes the significant impact of the loss of the Growth Plan.

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. To achieve this, staff will work to ensure consistency with the new PPS 2024 and changes in Regional planning responsibilities while balancing the objectives and vision set out in Brampton Plan. 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 as implementation of the new policies begins.

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