

September 24, 2020

Resolution Number 2020-670
Sent by e-mail

**Subject: Comments on Proposed Amendment #1 and Land Needs
Assessment Methodology for A Place to Grow: Growth Plan for the
Greater Golden Horseshoe**

Nando Iannicca
Regional Chair & CEO

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I am writing to advise that Regional Council approved the following resolution at its meeting held on September 10, 2020:

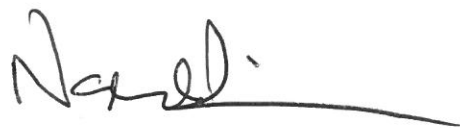
Resolution 2020-670:

That the comments on proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe, outlined in the report of the Interim Commissioner of Public Works and the Interim Chief Planner and Director, Regional Planning and Growth Management, titled "Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe", be endorsed;

And further, that a copy of the subject report be forwarded to the City of Brampton, the Town of Caledon, the City of Mississauga and the Ministry of Municipal Affairs and Housing.

A copy of the subject report is report is provided for your information.

Kindest personal regards,



Nando Iannicca,
Regional Chair and Chief Executive Officer
Municipality of the Region of Peel

Cc: Andrew Farr, Interim Commissioner of Public Works
Adrian Smith, Interim Chief Planner and Director of Regional Planning and Growth Management
Peter Fay, City Clerk & Director of Council & Admin. Services, City of Brampton
Laura Hall, Acting General Manager, Corporate Services and Acting Town Clerk, Town of Caledon
Diana Rusnov, City Clerk of City of Mississauga

REPORT TITLE: **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

FROM: Andrew Farr, Interim Commissioner of Public Works
 Adrian Smith, Interim Chief Planner and Director, Regional Planning and Growth Management

RECOMMENDATION

That the comments on proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe, outlined in the report of the Interim Commissioner of Public Works and the Interim Chief Planner and Director, Regional Planning and Growth Management, titled “Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe”, be endorsed;

And further, that a copy of the subject report be forwarded to the City of Brampton, the Town of Caledon, the City of Mississauga and the Ministry of Municipal Affairs and Housing.

REPORT HIGHLIGHTS

- On June 16, 2020, the Ministry of Municipal Affairs and Housing (the Ministry) released two documents that propose changes to A Place to Grow – Growth Plan for the Greater Golden Horseshoe, 2019.
 - This report includes a summary of the key Provincial proposed changes, preliminary implications and comments for planning at the Region of Peel.
 - The proposed amendments and evolving provincial planning context will require some adjustments to the current Peel 2041: Official Plan Review, including growth management and Settlement Area Boundary Expansion focus area work.
 - A detailed staff level response to the Ministry is attached as Appendix I.
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DISCUSSION

1. Background

On June 16, 2020 the Ministry of Municipal Affairs and Housing (the Ministry) released two documents that propose changes to A Place to Grow – Growth Plan for the Greater Golden Horseshoe, 2019. These proposed changes were released through the Environmental Registry of Ontario (ERO) website, as follows:

- Proposed Amendment #1 to A Place to Grow Growth Plan for the Greater Golden Horseshoe (Schedule 3 Population and Employment Forecasts) - ERO 019-1680.
- Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe – ERO 019-1679.

Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The Province advises that the proposed changes are intended to provide municipalities with more flexibility to respond to demographic, employment, market demand, and housing affordability trends in the Greater Golden Horseshoe (GGH). The following changes are proposed:

- Extends the planning horizon from 2041 to 2051;
- Three growth outlooks are provided for consideration (low, reference and high). The reference forecast directs an additional 310,000 people and 100,000 jobs to Peel by 2051;
- Upper-tier municipalities may use higher growth forecasts for planning and managing growth;
- Simplifies the approach to calculating the amount of land needed to accommodate new growth;
- Permits the conversion of Provincially Significant Employment Zones outside of a municipal comprehensive review if the lands are within a Major Transit Station Area;
- Allows for new aggregate resource extraction in endangered and threatened species habitats;
- Introduces new definitions and consistency with the Provincial Policy Statement, 2020;
- Required consultation with Indigenous communities to implement the plan; and,
- Proposed amendments maintain the existing July 2022 Provincial conformity deadline.

This report highlights the key proposed changes, identifies potential implications, and staff level comments and recommendations. Appendix I provides more detail regarding the proposed changes and staff comments, which were submitted to the Ministry by the commenting deadline, July 31, 2020 (45-day comment period).

The proposed amendments will have an impact on the current Peel 2041 Official Plan Review work and other program areas, that utilize the growth forecasts to support program planning and service delivery. The impacts include the allocation of new growth to the local municipalities, additional lands needed through the Settlement Area Boundary Expansion work, and the assessment of infrastructure capacity to accommodate the forecasted growth to 2051.

2. Overview of Proposed Policy Changes, Implications and Response

This section provides highlights of the key changes proposed in Amendment #1 and Proposed Land Needs Assessment Methodology, 2020, and identifies key implications and recommendations. Detailed technical comments and staff recommendations are provided in Appendix I.

New Planning Horizon to 2051

The proposed amendment would extend the planning horizon from 2041 to 2051 to support long term planning over a 30-year period. Municipalities would be required to plan to the year 2051, as a part of their current official plan and municipal comprehensive reviews.

Staff support the extension of the planning horizon to 2051 to accommodate the long-term planning and management of growth.

Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

Growth Scenario Outlook

The proposed amendment provides three growth outlooks for consideration (low, reference, and high). Based on the Provincial Technical Background document associated with the 2051 forecasts, the analysis supports the reference scenario as the most likely outlook utilizing the best information available, which is consistent with long term comprehensive planning.

In order to accommodate the growth forecast provided by the Province, the timely investment and delivery of key transportation infrastructure such as the GTA West Transportation Corridor, as well as provincial and regional transit initiatives will be required to support planning for employment and complete communities.

Staff support the reference scenario in Appendix II – Mock B as the recommended forecast. This is supported along, with additional Provincial policy direction for municipal authority to manage the staging and sequencing of new growth in a financially sustainable manner ensuring the development of complete communities.

Minimum Schedule 3 Forecast

The proposed amendment would update policies to refer to the Growth Plan Schedule 3 forecasts as minimums for planning and managing growth. Upper- and single- tier municipalities would have the option to develop population and employment growth forecasts beyond what is prescribed on Schedule 3, through a municipal comprehensive review process.

Staff have concerns associated with the Schedule 3 forecast set as a minimum. This policy approach has the potential for municipalities to see great pressure to make non-evidence-based planning decisions for long term growth.

Staff suggest a policy reference be added, if flexibility beyond Schedule 3 is desired, which would permit municipalities to undertake a comprehensive and evidenced based approach linked to a consistent Land Needs Assessment Methodology to determine if additional growth needs are required beyond the Schedule 3 reference scenario, but not exceeding the high scenario.

In addition, given the higher growth and longer planning horizon, the Region also encourages the Province to consider strengthening municipal authority to impose strong staging and sequencing requirements through the planning and development process, in order to carefully manage growth that delivers complete communities and financial sustainability.

Provincially Significant Employment Zones and Major Transit Station Areas

Proposed policies provide flexibility that allows Provincially Significant Employment Zones (PSEZ) within Major Transit Station Areas to be converted to non-employment uses outside of a municipal comprehensive review. Previously there was no flexibility to convert PSEZ lands outside of a municipal comprehensive review. Staff support this increased flexibility.

Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

Transition to 2051

Proposed Amendment #1 does not include any transition for incorporating the new 2051 planning horizon and updated Schedule 3 forecasts, as a part of the current municipal comprehensive review, which has a conformity deadline of July 1, 2022.

If no transition is provided, it is recommended that the Province expedite the release of the final Amendment #1 and Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon.

Mineral Aggregate and Resources

The proposed policy would remove the prohibition of new mineral aggregate operations and new wayside pits and quarries being established in habitats of endangered and threatened species within the Natural Heritage System for the Growth Plan. The Natural Heritage System for the Growth Plan only affects three small areas in Peel. The majority of Peel's mineral aggregate resources is located in the Greenbelt, which is not affected by the proposed policy changes to the Growth Plan Natural Heritage System.

Although the effect of this policy is limited in Peel, the Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the *Endangered Species Act*, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.

Indigenous Communities Engagement

The proposed amendments strengthen policies around Indigenous engagement (from "encouraged" to "shall"), in terms of coordinating planning matters with Indigenous communities. Other proposed changes include removing references to First Nations and Metis, in order to capture the broader and more consistent reference of Indigenous communities.

It is recommended the Province provide guidance materials on what is considered an appropriate level of engagement, in order to assist municipalities in facilitating engagement and share best practices on how to engage indigenous communities.

Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe

A new simplified approach has been outlined for municipalities to determine the amount of additional housing units and jobs required to meet market demand in conformity with the Plan. The formal methodology previously issued by the Province is proposed to be removed and replaced with general guidance to support a more outcome-based method.

The Region of Peel supports efforts to deliver a consistent and transparent approach to determining the Land Needs Assessment, in accordance with the Growth Plan, 2019.

Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The proposed Land Needs Assessment Methodology has a more streamlined approach and provides flexibility to account for local conditions. However, it lacks the definitive direction required to enable a consistent methodology to be applied across the Greater Golden Horseshoe.

Staff recommend a structured and documented approach to the Land Needs Assessment that outlines the required steps, inputs, and data sources to be utilized for each required component.

3. Regional Work Plan Implications, Potential Risks, and Next Steps

Peel 2041: Official Plan Review Work Program

The proposed amendment and Land Needs Assessment will have an impact on the current Peel 2041: Regional Official Plan and Municipal Comprehensive Review. The current Official Plan Review, including allocation of growth is based on a planning horizon to 2041. However, Regional staff have endeavored to retain a flexible process given the anticipated Provincial consideration of increased population for Peel and an extended planning horizon.

The impact of the new growth allocations will need to be considered, as it relates to the current Peel 2041: Regional Official Plan Review focus areas. For example, the new forecasts and Land Needs Assessment Methodology will mean that additional lands will be required, as part of the settlement area boundary expansion (beyond the 1,300 hectares originally anticipated). It is possible that the anticipated December 2020 date for providing staff recommended settlement boundary details will be delayed by several months. Regional staff are working closely with local municipal partners to capitalize on past growth scenario work and endorsed growth forecast, to address the new Provincial proposed Amendment #1 directions. Additional technical analysis is required to determine how the new forecasted growth will be accommodated in Peel, including a local municipal allocation.

Further, in order to address the changing planning horizon of the forecast, the communication approach for the Peel 2041: Regional Official Plan Review and Municipal Comprehensive Review will undergo some slight adjustments. The Peel 2041 brand has begun to reference Peel 2041+ to raise continued awareness of anticipated changes to the planning horizon. When the Province makes a final decision on the planning horizon, Peel 2041+ will be changed accordingly (i.e. to Peel 2051). Also, staff will continue to monitor Provincial announcements, to assess whether further adjustments to the Peel 2041 work plan will be needed.

Potential Risks

Staff continue to manage the potential risks associated with this uncertainty in Provincial direction, while meeting the conformity deadline of July 1, 2022.

However, should the Province delay the release of the final Amendment # 1 and Land Needs Assessment, this may have implications on Peel 2041 related major bodies of work including: Major Transit Station Area, housing, transportation, employment land and growth management planning; delays to proceeding with Settlement Area Boundary Expansion recommendation; potential impact to meeting the Provincial conformity deadline; affect the ability to hold comprehensive consultation with stakeholders, implications for advancing

Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe

local municipal priorities (such as City of Brampton's 2040 Vision, Town of Caledon's Official Plan Review, and City of Mississauga's strategic city building initiatives); and anticipated risk to informing infrastructure and financial decisions to 2051.

In our comments to the Province, staff have recommended an expedited release of final forecasts and land needs assessment. In addition, staff continue to work with the Province to encourage an accelerated Provincial direction, in order to mitigate the risks noted above.

Growth Management Program

The Region's Growth Management Program was established to implement an integrated approach to planning, servicing and financing growth in Peel. An update to the Region's growth forecast will impact the Program's integrated work plan and influence future infrastructure decision-making in order to minimize the Region's debt risk.

A new growth forecast to the 2051 horizon will require updates to the Region's Master Plan's (including the Water and Wastewater Master Plan and Long-Range Transportation Plan), in order to meet the infrastructure requirements of projected growth. Through the Program's integrated approach, new growth allocation scenarios will need to be developed and integrated into the master plan process. The updated plans will serve as the basis for infrastructure programming and capital budget needs and is a primary input to future updates of the Region's development charge policies and background study.

The development of updated Plan's will be undertaken through an iterative process in support of the principles of Program. This includes maintaining the principle that growth pays for growth, aligning the timing of infrastructure projects with actual growth, and maximizing the use of existing infrastructure. This process will include extensive consultation with internal staff and external stakeholders, such as the local municipalities and members of the Building Industry and Land Development Corporation (BILD) through the Program's committee structure.

FINANCIAL IMPLICATIONS

There are no direct financial implications associated with this report. Any future considerations as a result of any updates required to the Regional Official Plan will be included in future budget submissions.

APPENDICES

Appendix I - Staff Comment letter to the Province on proposed Amendment #1 to A Place to Grow and Land Needs Assessment Methodology, 2020

Appendix II - Detailed Forecast Summary and Comparison, prepared by Hemson Consulting for the Ministry of Municipal Affairs and Housing

For further information regarding this report, please contact Adrian Smith, Interim Chief Planner and Director of Regional Planning and Growth Management, Ext. 4047, Adrian.smith@peelregion.ca.

Authored By: Naheeda Jamal, Acting Manager and April Fang, Intermediate Planner

**Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A
Place to Grow: Growth Plan for the Greater Golden Horseshoe**

Reviewed and/or approved in workflow by:

Department Commissioner, Division Director and Financial Support Unit.

Final approval is by the Chief Administrative Officer.

A handwritten signature in black ink, reading "Nancy Polsinelli". The signature is written in a cursive, flowing style with a large initial "N".

N. Polsinelli, Interim Chief Administrative Officer



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July 31, 2020

Sandra Bickford
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
23rd Floor, Suite 2304
Toronto, ON M7A 2J3

Re: **Proposed Amendment #1 to A Place to Grow - Growth Plan for the Greater Golden Horseshoe (EBO 019-1680) and Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe (EBO 019-1679)**

Ms. Bickford:

Thank you for the opportunity to comment on Proposed Amendment #1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the proposed Land Needs Assessment Methodology.

Regional staff support the Province in its review and update of the Schedule 3 forecasts, to reflect the best information available and support long term planning in accordance with the Provincial Policy Statement, 2020.

We encourage the Ministry to move forward quickly with a final Amendment and Land Needs Assessment Methodology to provide certainty as municipalities advance their respective comprehensive reviews.

Regional staff have the following comments and recommendations for consideration. Additional detailed comments can be found in Appendix 'I' attached.

Please note that at this time we are providing staff level comments. A report will be taken to Regional Council in September for endorsement. Regional Council may have additional comments for consideration at that time.

Comments and Requested Revisions

With respect to **Proposed Amendment #1 to A Place to Grow - Growth Plan for the Greater Golden Horseshoe (EBO 019-1680)**, please see the following comments from the Region of Peel:

- **Minimum Schedule 3 forecast**

We have concerns associated with the Schedule 3 forecast set as a minimum, this policy approach has the potential for municipalities to see great pressure to make non-evidence-based decision making about planning for long term growth.

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The policies as proposed provide too much flexibility and may have the unintended consequence of undermining the guiding principle of managing growth across the Greater Golden Horseshoe.

We suggest the following policy reference be added if flexibility beyond Schedule 3 is desired:

“Section 5.2.4 – Growth Forecasts

Municipalities may undertake a Land Needs Assessment through a Municipal Comprehensive Review to demonstrate the need for additional growth above the Schedule 3 forecasts but not exceeding the high scenario”

The provision would permit municipalities to undertake a comprehensive and evidenced based approach linked to a consistent LNA methodology to determine if additional growth needs are required beyond the Schedule 3 reference scenario, but not exceeding the high scenario. In addition, given higher growth and a longer planning horizon, we also encourage the Province to consider strengthening municipal authority to impose strong staging and sequencing requirements through the planning and development process, in order to carefully manage growth that delivers complete communities and financial sustainability.

- **Growth Scenario Outlooks**

The proposed amendment provides three growth outlooks for consideration (low, reference, and high). Based on the Technical Background document to support the 2051 Forecasts, the analysis supports the reference scenario as the most likely outlook utilizing the best information available that is consistent with long term comprehensive planning for potential outcomes. Restricting municipalities to just the low scenario is not supported, because it could result in actual growth outpacing planning for growth and infrastructure since the reference forecast is seen as the more likely outcome.

For the Region of Peel to accommodate the growth forecast provided by the Province, the timely investment and delivery of key transportation infrastructure such as the GTA West Transportation Corridor, as well as provincial and regional transit initiatives will be required to support planning for employment and complete communities.

We support the reference scenario – Mock B as the recommended forecast, with additional policy direction from the Province to support municipal authority to manage the staging and sequencing of new growth in a financially sustainable manner that ensures the development of complete communities.

- **Provincially Significant Employment Zones and Major Transit Station Areas**

Planning for Major Transit Station Areas and Employment Areas in a two-tier governance structure requires co-ordination between the upper tier delineations and

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the subsequent lower-tier implementation planning. The proposed policy will allow potential conversions to be supported by detailed planning including consideration for land use compatibility and the introduction of sensitive uses.

We support the increased flexibility proposed for planning Major Transit Station Areas and Provincially Significant Employment Zones.

- **New Planning Horizon**

We support the extension of the planning horizon to 2051 to accommodate the long-term planning and management of growth in accordance with the provisions of Policy 1.1.2 of the Provincial Policy Statement, 2020.

- **Transition to 2051**

Proposed Amendment #1 does not include any transition for incorporating the new 2051 planning horizon and updated Schedule 3 forecasts, as a part of the current municipal comprehensive review, which has a conformity deadline of July 1, 2022.

If no transition is provided, it is recommended that the Province expedite the release of the final Amendment #1 to A Place to Grow and Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon.

- **Mineral Aggregate and Resources**

The Region recognizes the role of the Endangered Species Act and the Species at Risk Act as the primary pieces of legislation to protect habitat of endangered and threatened species.

The Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the Endangered Species Act, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.

- **Indigenous Communities Engagement**

The proposed amendments strengthen policies around Indigenous engagement (from "encouraged" to "shall") in terms of coordinating planning matters with Indigenous communities. Other proposed change aligns with previous recommendations to remove First Nations and Metis to capture the broader and more consistent reference of Indigenous communities.

It is recommended the Province provide guidance materials on what is considered an appropriate level of engagement to assist municipalities in facilitating engagement and share best practices on how to engage indigenous communities with municipalities.



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Comments and Requested Revisions

With respect to **Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe (EBR 019-1679)**, please see the following comments from the Region of Peel:

The Region of Peel supports the Province in its efforts to deliver a consistent and transparent approach to determining the Land Needs Assessment in accordance with the Growth Plan, 2019.

The proposed Land Needs Assessment methodology (LNA) has a more streamlined approach and provides flexibility to account for local conditions. However, the new LNA lacks the definitive direction required in a consistent methodology to be applied across the Greater Golden Horseshoe as originally intended.

We recommend a structured and documented approach to the LNA that outlines the required steps, inputs, and data sources to be utilized for each required component.

If you have any comments or require clarification, please do not hesitate to contact duran.wedderburn@peelregion.ca or bihui.fang@peelregion.ca.

Sincerely,

Adrian Smith, RPP, MCIP
Acting Director and Chief Planner,
Regional Planning and Growth Management
Public Works

Appendix I – Detailed Comments

Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG)

Track Changes Review Guide

The text below is copied from the proposed amendment 1 to APTG, 2020 and was reviewed against APTG, 2019. Changes have been tracked in the following manner:

- ~~Pink strikethrough~~= Proposed 2020 deleted text
- Purple = Proposed 2020 added text

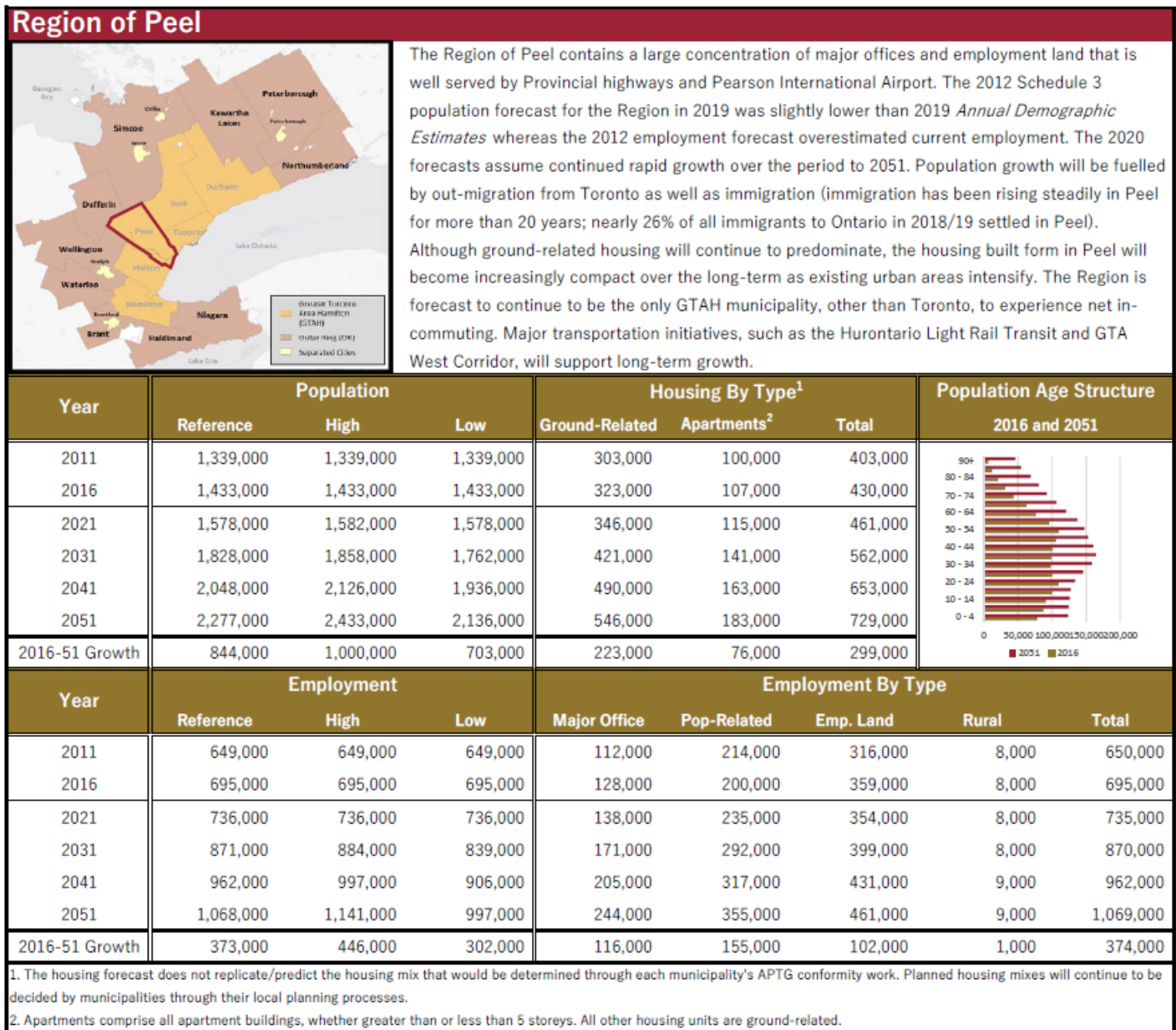
APTG	Policies	Provincial Submission Comments & Recommendations (Solutions)
2.2.1 Managing Growth	1. Population and employment forecasts contained in Schedule 3 <u>or such higher forecasts as established by the applicable upper- or single-tier municipality through its municipal comprehensive review</u> will be used for planning and managing growth in the GGH to the horizon of this Plan in accordance with the policies in subsection 5.2.4.	See comments in Sec.5.2.4.
2.2.5 Employment	10. Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would: <div>a) satisfy the requirements of policy 2.2.5.9 a), d) and e); b) maintain a significant number of jobs on those lands through the establishment of development criteria; and c) not include any part of an employment area identified as a provincially significant employment zone <u>unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4.</u></div>	Staff support the recommendation to permit the conversion of Provincially Significant Employment Zones within delineated Major Transit Station Areas outside of a Municipal Comprehensive Review. The proposed policy is consistent with draft policies proposed by the Region of Peel.
4.2.8 Mineral Aggregate Resources	2. Notwithstanding the policies in subsections 4.2.1, 4.2.2, 4.2.3 and 4.2.4, within the Natural Heritage System for the Growth Plan, mineral aggregate operations and wayside pits and quarries are subject to the following: a) no new mineral aggregate operation and no new wayside pits and quarries, or any ancillary or accessory use thereto, will be permitted in the following key natural heritage features and key hydrologic features: i. significant wetlands; <u>and</u> ii. habitat of endangered species and threatened species; and iii ii. significant woodlands unless the woodland is occupied by young plantation or early successional habitat, as defined by the Province, in which case, the application must demonstrate that policies 4.2.8.4 b) and c) and 4.2.8.5 c) have been addressed and that they will be met by the operation;	The Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the Endangered Species Act, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.
5.2.3 Coordination	3. Municipalities are encouraged to engage the public, First Nations and Métis communities , and stakeholders in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of local citizens. 4. <u>Municipalities shall engage Indigenous communities in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of these communities.</u> 4-5 .In cases where lower-tier official plans are not updated to implement this Plan in a timely or appropriate manner, upper-tier municipalities are encouraged to act in accordance with subsection 27(2) of the Planning Act. 5 6. Single-tier municipalities in the outer ring and adjacent municipalities should ensure a co-ordinated approach to implement the policies of this Plan.	Staff recommend the Province provide guidance materials on what is considered an appropriate level of engagement with indigenous communities and share best practices on how to engage indigenous communities.

	<p>6. 7. Planning authorities are encouraged shall co-ordinate planning matters with First Nations and Métis-Indigenous communities throughout the planning process to ensure that appropriate engagement is undertaken. Municipalities are encouraged to build constructive, cooperative relationships with First Nations and Métis communities and to facilitate knowledge-sharing in growth management and land use planning processes.</p>	
5.2.4 Growth Forecasts	<p>1. All references to forecasted growth to the horizon of this Plan are references to the population and employment forecasts in Schedule 3 or such higher forecasts as are established by the applicable upper- or single-tier municipality through its municipal comprehensive review.</p> <p>2. All upper- and single-tier municipalities will, through a municipal comprehensive review, apply the forecasts in Schedule 3 for planning and managing growth to the horizon of this Plan or such higher forecasts as are established through the municipal comprehensive review.</p> <p>3. The population and employment forecasts and plan horizon contained in the applicable upper- or single-tier official plan that is approved and in effect as of July 1, 2017 [placeholder for effective date] will apply to all planning matters in that municipality, including lower-tier planning matters where applicable, until the upper- or single-tier municipality has applied the forecasts in Schedule 3 in accordance with policy 5.2.4.2 and those forecasts are approved and in effect in the upper- or single-tier official plan.</p> <p>6. Outside of a municipal comprehensive review, the forecasts in Schedule 3 and Schedule 7 cannot be applied on a site-specific scale as the basis for approving or refusing proposals for development that would otherwise conform with all the policies of this Plan.</p>	<p>The basis of the Growth Plan is to plan for where and how growth will be managed in the Greater Golden Horseshoe, this is underpinned by the forecasts and allocation as the key drivers for evidenced based planning. Amendment #1 proposes to change the purpose of the population and employment forecast from a 'an informed estimate' that creates an envelope to a minimum standard or open envelope.</p> <p>This is a fundamental shift to planning and managing growth by referring to the Schedule 3 Forecasts as minimums and allowing municipalities to plan for higher growth forecasts through their MCR. This approach removes valued consistency across the GGH that the forecasts provide for planning and managing growth. It may also have the unintended consequence of creating unbalance across the GGH as municipalities may choose to plan for higher growth as a mechanism to drive land supply availability at the expense of other municipalities.</p> <p>We have concerns associated with the Schedule 3 forecast set as a minimum, this policy approach has the potential for municipalities to see great pressure to make non-evidence-based decision making about planning for long term growth.</p> <p>Staff recommend that references to the Schedule 3 forecasts as minimums in Proposed Amendment #1 and the new Land Needs Assessment methodology be removed.</p> <p>Staff suggest the following policy reference be included if flexibility is desired in Section 5.2.4 – Growth Forecasts.</p> <p><i>“Municipalities may undertake a Land Needs Assessment through a Municipal Comprehensive Review to demonstrate the need for additional growth above the Schedule 3 forecasts but not exceeding the high scenario”</i></p> <p>The provision would permit municipalities to undertake a Land Needs Assessment to determine if additional growth needs are required, benchmarked against the Schedule 3 forecasts but not exceeding the high scenario.</p>
1.2.3 Horizon of this Plan	<p>While the PPS, 2014 2020 provides for a time horizon of up to 20 25 years for making sufficient land available to meet projected needs, policy 1.1.2 of the PPS, 2014 provides that a provincial plan may provide an alternate time horizon for specific areas of the province. Within the GGH, this Plan provides that the applicable time horizon for land use planning is 2044 2051. While certain policies have specific target dates, the goals and policies of this Plan are intended to be achieved within the horizon of this Plan.</p>	<p>Staff support the extension of the planning horizon to 2051 to support the planning and management of growth in accordance with the provisions of Policy 1.1.2 of the Provincial Policy Statement, 2020.</p>
Effective Date and Transition	<ul style="list-style-type: none"> To clarify how planning matters that are currently in process will be affected by the Amendment, if approved; and A possible timeframe, to be set by the Minister, for municipalities to bring official plans into conformity with APTG as revised by the Amendment, if approved. 	<p>The proposed Amendment #1 does not propose any transition to incorporating the new planning horizon and Schedule 3 forecasts.</p> <p>If no transition is provided, it is recommended that the Province expediate the release of the final Amendment #1 to A Place to Growth and the Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon. This includes updating technical background studies and master plans required to support the Municipal Comprehensive Review.</p>
Growth Outlook	<p>Schedule 3 is replaced by one of the following proposed Schedule 3 - under three growth outlooks: Reference Forecast, and High and Low Scenarios.</p>	<p>Staff support the Reference Scenario – Mock B provided as the most likely growth outlook for Peel based on the Technical Backgrounder for the forecast which represents the best information currently available.</p> <p>The rate of growth proposed in the reference forecast is generally reflective of the 20-year (1996-2016) historic growth rates in Peel. For the Region of Peel to accommodate the level of growth forecasted by the Province,</p>

		<p>key infrastructure investments in transportation and transit will be required from the Province to unlock employment lands and support mobility in mixed use communities planned for Major Transit Station Areas.</p> <p>Further, for the Region to support the Reference Scenario – Mock B, Provincial support for the ability of municipalities to stage and sequence growth in a logical and financially sustainable manner is required. This will reinforce the principles of the growth plan to plan and manage growth in an integrated manner that considers land use planning, infrastructure investment, and environmental protection as key outcomes to sustainably deliver complete communities.</p>
Land Needs Assessment (General)		<p>Staff support the intent of the Province to simplify the new Land Needs Assessment with a streamlined approach and flexibility to account for local conditions and growth assumptions. However, a balance must be maintained with respect to providing a free-standing document as a reference guide to how land need is determined consistently across the Greater Golden Horseshoe.</p> <p>Staff recommend that the Land Needs Assessment be provided in a structured document that defines the required ‘steps’ and analysis to be undertaken and the key data sources to be referenced as inputs for the key components.</p>
LNA Timeframes	<ul style="list-style-type: none"> • Municipalities must, at all times, have enough land with servicing capacity to provide at least a three-year supply of residential units available through lands suitably zoned in lower-tier municipalities. • Municipalities shall also plan to maintain the ability to accommodate residential growth for a minimum of 15 years. 	<p>The land supply requirements are consistent with the policies in the new Provincial Policy Statements, 2020.</p>
Purpose	<p>Recognizing that local needs are diverse, the proposed new Methodology aims to provide the key factors to be considered as municipalities plan to ensure that a sufficient and appropriate mix of land is available to:</p> <ul style="list-style-type: none"> • accommodate all housing market segments; • avoid housing shortages; • consider market demand; • accommodate all employment types, including those that are evolving; and • plan for all infrastructure services that are needed to meet complete communities’ objectives to the horizon of the Plan 	<p>Staff recommend that the Province provide clarity around how the key factors are to be incorporated into the LNA. This could be achieved by providing key examples such as what would suffice as consideration for ‘market demand’.</p>
Implementation and Conformity	<p>It does not preclude municipalities from considering alternate assumptions about population and employment growth to the horizon of the Plan.</p>	<p>The Region currently utilizes a scenario-based approach to test growth assumptions as a part of an integrated approach to growth management.</p> <p>The Region supports the flexibility provided by the Province to test alternative growth assumptions to determine appropriate growth assumptions based on localized conditions.</p>
LNA Components – Community Area	<p>Community Area Land Needs Assessment</p> <ul style="list-style-type: none"> • Population Forecasts • Housing Needs Analysis • Housing Allocation and Supply Inventory • Community Area Jobs Analysis and Reconciliation 	<ul style="list-style-type: none"> • References to ‘minimum intensification and Designated Greenfield Area (DGA) targets’ should be clarified to note that this will be the minimum intensification and DGA target established by the municipality through their MCR analysis. • The Region supports direction from the Province to support the reduction of the rate at which land is consumed and the integration of viable transit services to support a compact built form. Provincial investment in Regional transit infrastructure is an important part of delivering on this objective.
Housing Needs Analysis	<p>Housing need can be broken down by type of dwelling to include age-specific household formation rates in order to forecast growth in the number of households to the Plan horizon, categorized by dwelling type (i.e. ground-related versus high-rise). It should consider both historical and future trends for household growth by units by type.</p>	<p>The methodology does not address how affordable housing will be considered as a part of the housing need discussion. With affordability being a key issue in the GGH, there is an opportunity to require consideration through the land needs discussion to incorporate affordable housing into the allocation and supply inventory assessment. This objective could be delivered by incorporating consideration for the following:</p> <ul style="list-style-type: none"> • Specify the amount of supply that must be maintained to ensure affordable ownership housing prices

	<p>Municipalities may refer to background information on housing growth by type prepared as part of the review and update of A Place to Grow's population and employment forecasts.</p> <p>Household demand can be adjusted for factors such as changes in vacancy rates, market contingencies, additional housing needs for post-secondary students, temporary workers, or units that will be lost over time for various reasons.</p>	<p>to the forecast population and income distribution - simply meeting demand with supply will help ensure price stability, but not necessarily lowered prices.</p> <ul style="list-style-type: none">• Require municipalities to incorporate trends around household composition as well as corresponding income distribution in order to specify minimum amounts of affordable housing.• Give municipalities more authority to require developers to deliver on a reasonable share of housing that addresses community need, including how the planned range and mix of housing options is considered.• Require tenure and price points, e.g. affordability for the forecast population and income distribution.• Capture tenure, asking prices, unit type and bedroom count as a part of the housing supply inventory
Employment Allocation and Reconciliation	<p>Municipalities can allocate the categorized forecasted jobs with the understanding that community area jobs are to be located within settlement areas but outside employment areas while employment area jobs are located in the employment areas. In addition, community area jobs in the designated greenfield area may be counted towards the minimum density target.</p> <p>Through allocations municipalities can determine whether there are sufficient employment area lands in the municipality to accommodate the employment growth established.</p>	<ul style="list-style-type: none">• Clarity is required within the methodology regarding the inter-relationship between office jobs in Community Area lands versus Employment Area in existing settlement areas and potential expansion areas.• Additional details are required on the process and at what stage of the LNA municipalities will reconcile lands to be converted through employment conversions.

Region of Peel – Detailed Forecast Summary and Comparison



Source: Greater Golden Horseshoe – Growth Forecasts to 2051, prepared by Hemson Consulting for the Ministry of Municipal Affairs and Housing, page 63