



RE: Environmental Registry of Ontario Posting 019-6813 – Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as ‘the City’) appreciates the opportunity to provide comments on the proposed changes outlined in the Environmental Registry of Ontario posting 019-6813 – Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

The City is supportive of efforts by the Province to address housing supply and development challenges, and remain committed to working with the Province towards their ambitious goal of delivering more housing. However, the City provides a number of recommendations below in response to the proposed changes.

Please see below specific comments on individual aspects of the proposed legislative changes. Please note that the proposed changes are listed in order of occurrence within the proposed Provincial Planning Statement, 2023 (PPS 2023) and make reference to the corresponding policies in the current Provincial Policy Statement, 2020 (PPS 2020), and A Place To Grow: The Growth Plan for the Greater Golden Horseshoe (Growth Plan).

Chapter 1: Introduction			
PPS 2023 Chapter Reference	Key proposed change	City Comment	Recommendation
1	Addition of the term “large and fast growing municipalities” (LFMs)	<p>The City recognizes the Province’s intent to capture the tenets of the Growth Plan through the term “large and fast-growing municipalities”. However, the magnitude of growth across the Greater Golden Horseshoe will lead to increased demand for infrastructure and coordination across this region to manage growth in an orderly manner. The Growth Plan, alongside the Greenbelt Plan, and Oak Ridges Moraine Conservation Plan play a key role in managing how and where growth should occur and where it should not. The details of the Growth Plan provide key information to deliver a clear plan that reflects the level of growth that these locations will achieve in relationship to where growth must be protected against. The orderly coordination of growth is well determined through the Growth Plan, which differs from the rest of Ontario’s municipalities.</p>	<p>Although the City supports the Province’s aim to increase housing supply, it must take a balanced approach across planning priorities to ensure the creation of complete communities and coordination to ensure the efficient and effective use of investments. The City recommends that additional policies from the Growth Plan be integrated into the proposed PPS 2023 to provide specific growth forecasts, a standardized land needs assessment methodology, clear settlement area boundary expansion criteria, intensification requirements, and infrastructure planning guidance to support transit, maximize infrastructure to service growth and integrate climate change considerations as a fundamental principle in all planning decisions.</p>

			Furthermore, the PPS 2020 mentions climate change adaptation in the vision statement, which is important to maintain as a key priority.
1	Zoning and development permit by-laws should be forward-looking and facilitate opportunities for an appropriate range and mix of housing options	The City supports the additional text but request expansion to identify the need to balance a range of employment opportunities as a component, ensuring the creation of complete communities.	The City recommends the addition of text to expand beyond housing to consider the range of uses that meet the current and future long-term planning horizon needs of communities.
1	Additional text highlighting the unique role and contribution of Indigenous communities in land use planning and development. Removal of language that provided a focus on the cultural diversity of the Province.	The City agrees with the importance of highlighting the role Indigenous communities must have in the planning process and remains committed to reconciliation.	The City notes that it is important to touch on the Province's rich cultural diversity. This is an integral part of planning in Ontario, especially in Brampton, that should be highlighted.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

PPS 2023 Chapter Reference	Key proposed change	City comment	Recommendation
2	Remove pre-amble text from Section 1.0 Building Strong Healthy Communities (PPS 2020).	The wording in this section should be maintained. This highlights the triple bottom line approach, which is important for good land use planning.	The City recommends maintaining existing language.
2.1	Planning for People and Homes		
2.1.1	Add the direction for municipalities to incorporate the development potential resulting from a Minister's Zoning Order into the municipality's next official plan update, as an addition to projected needs over the planning horizon established in the official plan.	Zoning orders should consider where growth and development are directed through a local Official Plan. Significant public engagement has occurred to identify how and where major growth should occur and where gentle intensification is more appropriate. The range and mix of uses has been determined through this process and should be considered in what is approved. As the next Official plan update may not take place for another 10 years, it is important to ensure an MZO does not compromise growth allocations in alignment with strategic growth areas and key investment in higher order or rapid transit.	The City recommends MZO's only be approved if there is alignment with the direction set forth through a local Official Plan, aligning with the core principles determined through public consultation and directing large-scale growth to strategic growth areas.
2.1.3	Remove the allocation of population and units in provincial plans which are currently reflected in the land and unit supply allocated by upper-tier municipalities to	As identified in the Growth Plan, provincial allocations should be provided for division across large municipalities as this also helps to identify the allocation of provincial funding based on the allocation of growth occurring.	The City recommends that provincial plan allocations of population and units be maintained.

	lower-tier municipalities (1.4.2 PPS 2020).		
2.1.4	Amendments to policy 1.1.1 (PPS 2020) to reduce the requirements through which Planning Authorities should support the achievement of complete communities.	It is important to maintain the language around “affordable and market-based range and mix of housing types” as “housing options” is too broad of a term. It is also crucial to maintain the importance of parks and open spaces as part of the complete communities.	The City recommends maintaining the language around “affordable and market-based range and mix of housing types” as “housing options” is too broad of a term. The City also recommends maintaining the wording regarding “avoiding development and land use patterns which may cause environmental or public health and safety concerns” and maintaining language around achieving cost-effective development patterns and optimization of transit-investments, as this directly supports the creation of transit-oriented communities and intensification aims for the city.
2.2	Housing		
2.2.1	Amendments to how Planning Authorities should provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market areas (1.4.3 PPS 2020).	The Service Manager alone cannot address the affordable housing needs of Brampton. A variety of partners are required beyond Regional coordination with local municipalities, including private developers and non-profits in the development of new housing. Minimum targets help to identify key intentions to deliver a full mix and range of housing	The City recommends that the requirement to include minimum targets for the provision of affordable housing be maintained, as this plays a critical role in ensuring that a full mix of market and affordable housing options are

		<p>options, providing key performance indicators for the development industry in supporting the delivery of “a full mix and range of housing options”.</p> <p>Additional residential units should be maintained as playing a key role in supporting gentle intensification.</p> <p>The introduction of new housing options within previously developed areas is extremely important, however, staff recognize that not all lands are appropriate for the introduction of sensitive uses, such as new residential development.</p>	<p>delivered to Brampton residents.</p> <p>The City recommends maintaining the definition for “affordable” and “low and moderate income households” - aligning with applicable housing and homelessness plans.</p>
2.3	Settlement Areas		
2.3	Proposal to remove pre- amble text from section 1.1.3 PPS 2020	<p>Identification of the importance of efficient development patterns should be maintained, specifically, the focus on the protection of resources and importance of the effective use of infrastructure/public service facilities.</p> <p>Information about variations in settlement areas should be maintained to recognize the vast differences in settlement areas across Ontario.</p>	The City recommends maintaining the preamble text of Section 2.3.
2.3.1	Clarification on where growth should be directed in Settlement Areas (1.1.3.1 PPS 2020)	Staff agree with the clarification of where growth should be directed in settlement areas.	The City supports this change.

2.3.2	Reduce the requirements for land use patterns within settlement areas (1.1.3.2 PPS 2020)	Minimizing negative impacts to air quality and climate change are key tenets for the efficient use of lands and are key pillars for developing sustainable communities. Preparing for the impacts of climate change are integral for long-term planning in Ontario and must be highlighted.	The City recommends maintaining 1.1.3.2 c. and d. from the PPS 2020.
2.3.3	Removal of policies regulating new development within settlement areas (1.1.3.3 – 1.1.3.7 PPS 2020).	It should be articulated that planning for a full mix of employment uses, amenities, parks, open space, trails and community services is imperative to creating complete communities.	The City recommends adding “including by planning for a range and mix of housing options, employment, amenities, and community services and prioritizing planning and investment...”
2.3.4	Removing the requirement for Planning Authorities to identify a new settlement area or allow a settlement area boundary expansion to occur only during a municipal comprehensive review, and reducing the conditions which the new settlement area or boundary expansion must meet (1.1.3.8 – 1.1.3.9 PPS 2020)	Settlement area boundary expansions, as currently based on criteria outlined through the Growth Plan, which have major impacts to infrastructure planning should be limited to comprehensive review processes that are evaluating the overall impacts to long-range planning over the planning horizon.	The City recommends maintaining the existing wording, specifically on when refinements can be made in a manner that manages expansion and protects for future growth, prioritizing intensification. 1.1.3.8 a. (PPS 2020) should also be maintained, as priority focus should be on intensification, redevelopment and designated growth areas and reducing greenfield expansion. Furthermore, reference to protecting public health and safety and the

			natural environment in policy 1.1.3.8 b. (PPS 2020) should also be maintained.
2.3.5	Amendment to encourage Planning Authorities, and specifically LFMs to establish density targets of at least 50 residents and jobs per gross hectare for new settlement areas or settlement area expansion lands	As servicing is a large concern, coordination across regional boundaries is important to manage the allocation of servicing across municipalities, especially LFMs. SABEs being enabled outside of the MCR process could lead to conflict across municipalities on how growth will be phased and sequenced.	The City requires clarification from the Province on how this will be effectively balanced.
2.4	Strategic Growth Areas		
2.4.1.1	Amendment to require planning authorities to identify an appropriate minimum density target for each strategic growth area (5.2.3.2, Growth Plan)	The City supports focusing growth in these locations. Identifying the importance of amenities and community services to meet growing demand, with access to multi-modal transportation networks is key to deliver complete communities.	
2.4.1.2	Reductions to the size or changes to the location of urban growth centers may only occur through a new official plan or OPA	This is helpful clarification, but the City requests clarification on the ability to expand the size of the UGC. The policy speaks solely to reducing or changing the location. The ability to expand the boundaries should be clarified.	The City requests clarification be provided on the ability to expand the UGC.
2.5	Rural Areas in Municipalities		
2.5	Removing the requirement for Planning Authorities to apply relevant policies of Section 1: Building Strong Healthy Communities, Section 2: Wise Use and Management of Resource, and Section 3:	The City supports maintaining the application of other policies in planning for rural lands.	The City recommends that 1.1.5.1 from the PPS 2020 be maintained.

	Protecting Public Health and Safety (PPS 2020) when directing development on rural lands (1.1.5.1 PPS 2020)		
2.8	Employment		
2.8.1.1	Amendment to how Planning Authorities shall promote economic development and competitiveness (1.3.1 PPS 2020)	The City supports intensification of employment uses but the original policy 1.3.1 d. should be maintained to ensure the necessary infrastructure is delivered to support growth.	The City recommends the words “liveable and resilient” be maintained and that the original policy 1.3.1 d. be maintained: “d. ensuring the necessary infrastructure is provided to support current and projected needs.”
2.8.1.3	Amendment to permit a diverse mix of land uses, including residential, employment, public service facilities, and other institutional uses on lands outside for employment outside of employment areas, while taking account the transition of uses to prevent adverse effects.	This policy should provide further details to ensure that employment is still delivered in the mixed-use context.	The City requests further clarification to ensure that employment is still delivered in the mixed-use context.
2.8.1.5	Amendment to direct major office and major institutional development to MTSA or other strategic growth areas where frequent transit service is available	The City agrees with the direction for major office and major institutional development in strategic growth areas where frequent transit is available. The City supports protections of locations for major office to ensure a full mix of employment uses across the city.	The City requests the ability to enforce policies protecting employment areas to ensure the long-term economic growth and development of the city.

2.8.2.2	Amendments to how planning authorities shall designate, protect, and plan for all employment areas in settlement areas.	The City requests that major office also be protected in employment areas and that office uses not associated with the primary employment use should not be prohibited. Office nodes should have the same protection policies as other employment areas as they are a significant component of the city's job base. Aligned with the comments submitted to the change of definition to employment areas in the <i>Planning Act</i> , the City requests that office remain a protected employment use.	The City requests the Province maintain office as a key protected employment use.
2.8.2.3	Removal of the requirement for planning authorities to assess and update employment areas through an official plan review or update (1.3.2.2 PPS 2020).	The City supports the assessment and update of employment areas, however, this should be conducted through an Official Plan review or update.	The City recommends maintaining the original language identifying the appropriate time to assess and update employment areas.
N/A	Removal of policies requiring industrial and manufacturing uses in employment areas to provide separation and mitigation from sensitive land uses, and for sensitive land uses that are not ancillary to manufacturing or industrial uses in employment areas to be prohibited (1.3.2.2, 1.3.2.3 PPS 2020).	The separation or mitigation for sensitive land uses is integral to be maintained through policy, ensuring the health and safety of residents and workers in the city. Land use compatibility is integral to the planning of these locations and the long-term viability of employment areas. Although the D-6 Guidelines provide further requirements for land use compatibility, protection through the PPS 2023 is important to enshrine these guidelines through policy.	The City recommends this language be maintained.
2.8.2.4	Amendments to how and when planning authorities	Employment conversion policies have been a significant tool in the protection	The City recommends maintaining the current

	<p>may permit employment conversions, which will no longer be required to be conducted at the time of municipal comprehensive reviews (1.3.2.4 PPS 2020).</p>	<p>of employment areas since they were established. Brampton has experienced enormous pressure to convert employment lands, and without these policies it will be much easier to erode the city's employment areas. Municipal Comprehensive Reviews offer an ideal time to comprehensively evaluate the existing employment areas, where a conversion could be warranted and holistically look at the impact to the employment land base. Enabling conversions or removal of employment lands at any time could lead to the erosion of critical employment areas across the city, leaving reduced or patchwork areas. This is also where the maintenance of the provincially significant employment zone is important, as it provides further protections for key employment lands in Brampton.</p>	<p>conversion requirements limiting conversion or removal of employment lands during an MCR. If the current conversion requirements are not maintained, the City recommends that municipalities be authorized to strengthen Official Plan policies to limit conversions.</p>
<p>N/A</p>	<p>Removal of the concept of Provincially Significant Employment Zones and policies related to PSEZs (1.3.2.5 PPS 2020).</p>	<p>The protection of employment areas through Provincially Significant Employment Zones or regionally significant areas are critical to the provincial and local economy, and should be maintained and protected for long-term economic health. Provincial housing targets should not have an impact on the Province's ability to protect the long-term viability of employment areas, and without the</p>	<p>The City requests the maintenance of Provincially Significant Employment Zones to protect critical employment lands in the city.</p>

		protection of a PSEZ, they run the risk of being slowly eroded by the introduction of sensitive uses.	
2.9	Energy Conservation, Air Quality and Climate Change		
2.9.1	Removal of requirements to support energy conservation and efficiency through land use and development patterns including promoting active transportation and transit supportive development, focusing travel and freight intensive uses on sites which are well served by relevant modes of travel, etc. (1.8.1 PPS 2020)	<p>The City requests that the support for energy conservation, efficiency and improved air quality, as well as public transit-based policies remain in the policy (original language) to ensure climate change remains a key pillar for planning decision-making. As a key principle for growth, the new draft Official Plan aligns land use to public transit investment, ensuring growth and intensification occurs in a sustainable manner, thereby reducing car-oriented development.</p> <p>The design and orientation policy that speaks to maximizing energy efficiency and considering the mitigation effects of vegetation and green infrastructure, as well as maximizing vegetation within settlement areas are integral for healthy communities that are working to address climate change.</p>	The City recommends the Province maintain reference to transit supportive land use and development patterns that shorten commute journeys and decrease congestion, as well as language that mitigates effects of vegetation and design/orientation that maximizes energy efficiency and conservation, while integrating green infrastructure.

Chapter 3: Infrastructure and Facilities			
PPS 2023 Chapter Reference	Key proposed change	City Comment	Recommendation
3.1	General Policies for Infrastructure and Public Service Facilities		
3.1.1	Removal of requirement for infrastructure and public service facilities to be provided in an efficient manner that prepares for the impacts of a changing climate (1.6.1 PPS 2020)	Preparing for the impacts of climate change when accommodating projected needs for infrastructure and public services is an integral approach to sustainable growth and development in Brampton.	The City requests the language that focuses on preparing for the impacts of climate change be maintained.
3.1.2	Removal of requirement for Planning Authorities to promote green infrastructure (1.6.2 PPS 2020).	The language identifying that planning authorities should promote green infrastructure is an important commitment in the PPS that supports climate-ready and resilient investments that help to mitigate and adapt to climate change.	The City recommends the reference to green infrastructure remain, as it is an important policy tool in responding to climate change.
3.1.6	Amendment directing planning authorities to consider and encourage innovative approaches in the design of schools and associated childcare centers	As the city grows and intensifies, the development of compact built form for a large array of uses and community services is integral to support the population growth that will occur. Opportunities to encourage the integration of schools and childcare facilities into compact development is encouraged by the City.	The City supports this policy change and agrees with the direction.
3.2	Transportation Systems		
N/A	Removal of policy 1.6.7.4 (PPS 2020): A land use pattern, density, and mix of uses should be promoted that	As congestion is a major issue identified by Brampton residents, growing in an efficient and sustainable manner requires that land use patterns and a	The City requests this language be maintained, as it aligns with the core principle of creating 15-minute communities, one of

	minimize the length and number of vehicle trips and support current and future use of transit and active transportation (1.6.7.4 PPS 2020)	mix of uses be directed in areas already serviced by public transit.	the key goals of draft Brampton Plan.
3.5	Land Use Compatibility		
	Removal of specific requirements for permitting sensitive land uses adjacent to industrial, manufacturing, or other major facilities that are vulnerable to encroachment	The separation of sensitive land uses is integrally important, especially for major facilities, as well as planned industrial or manufacturing uses. The removed criteria (3.5.2 a-d) are important considerations to have enshrined in policy.	The City requests the original language identifying the criteria to be demonstrated be maintained.
3.6	Sewage, Water, and Stormwater		
3.6.1	Removal of requirement for sewage and wastewater services to prepare for the impacts of a changing climate (1.6.6.1 PPS 2020)	Staff request maintaining reference to impacts of a changing climate, as it is important to consider in the context of this infrastructure.	The City recommends maintaining the original 3.6.12.b.2 “prepares for the impacts of a changing climate”, as this is an integral part of responding to climate change through planning for sewage and water services, with a growing role for stormwater management.
3.6.2	Removal of policy language promoting intensification and redevelopment where feasible in areas with existing municipal sewage and water services, to optimize the use of the services; and, clarification provided that	The City supports opportunities to clarify intent. However, the content identifying that intensification and redevelopment should be promoted should be changed from promoted to “prioritized” to optimize the use of services, as this leads to the most cost efficient and	The City requests the reintegration and following change to the original language: “Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment should be

	municipal sewage and water services include both centralized and decentralized servicing systems (1.6.6.2 PPS 2020).	effective method for managing municipal sewage and water services.	prioritized wherever feasible to optimize the use of the services.”
3.6.7	Removal of the determination of sufficient reserve sewage system capacity to include treatment capacity, when allowing lot creation (1.6.6.6).	Consideration for treatment capacity from private communal sewage services and individual on-site sewage services should be maintained through policy.	The City recommends the original wording be maintained.
3.6.8	Removal of preparing for the impacts of a changing climate through planning for stormwater management (1.6.6.7).	Preparing for the impacts of climate change plays a key role in stormwater management and is an important priority to highlight through the PPS.	The City recommends maintaining the existing language on preparing for the impacts of a changing climate and the reference to the effective management of stormwater.
3.7	Waste Management		
3.7.1	Removal of requirement for waste management systems to facilitate, encourage, and promote reduction, reuse, and recycling objectives (1.6.10.1 PPS 2020).	The City recognizes that Integrated Waste Management includes reducing, reusing and recycling, as well as recovering energy from waste that cannot be managed in other ways. Maintaining language to this effect to explain Integrated Waste Management is important to ensure the intent of reducing waste, reusing materials, recycling and recovering energy from waste is highlighted.	The City recommends expanding the wording to explain integrated waste management to ensure the objectives of this model are clearly identified.
3.8	Energy Supply		
N/A	Removal of policies regarding ‘Long Term Economic Prosperity’ (1.7.1 PPS 2020)	The City recommends maintaining the entire section to ensure that the economic growth of the city occurs in a	The City recommends maintaining the original policy language.

		<p>manner that is optimizing land, resources, infrastructure and public service facilities, enhancing downtowns (Brampton has invested in a vibrant Downtown and Uptown), encouraging a sense of place, promoting the redevelopment of brownfield sites, providing reliable multimodal transportation systems and sustainable tourism development. The agricultural system policies, energy conservation and increased energy supply, as well as minimizing negative impacts from climate change are critical to supporting the long-term environmental health of Brampton, as well as Ontario more generally.</p>	
3.9	Public Spaces, Recreation, Parks, Trails and Open Space		
3.9.1	<p>Removal of the requirement for publicly accessible built and natural settings for recreation to be equitably distributed (1.5.1 PPS 2020).</p>	<p>The City supports the addition of “inclusive communities”, as well as “persons of all ages and abilities” to identify the full range of needs in planning for residents at every age, stage and ability.</p> <p>However, the City requests “Equitable distribution” remains, as this is an integral part of good planning, as historically, access to public spaces, recreation, parks, trails and open space have not always been fairly considered especially for vulnerable or marginalized communities. Maintaining equitable</p>	<p>The City recommends keeping “equitable distribution” in the wording to recognize that planning for equity, specifically in public spaces, recreation, parks, trails and open space, is integral for great communities for people of all ages, abilities, incomes and backgrounds.</p>

		distribution in this section is important to ensure past historical inequity does not continue.	
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Chapter 4: Wise Use and Management of Resources			
PPS 2023 Chapter Reference	Key proposed change	City comment	Recommendation
4.1	Natural Heritage		
	As of April 6, 2023, natural heritage policies and related definitions remain under consideration by the government. Once proposed policies and definitions are ready for review and input, they will be made available through a separate posting on the Environmental Registry of Ontario. ERO# 019-6813 will be updated with a link to the relevant posting once it is available.	The City will await the release of the Natural Heritage policies, however, these are an important component in getting a comprehensive perspective of the proposed PPS 2023.	The Province should ensure sufficient time for the City to comprehensively evaluate the proposed Natural Heritage policies, upon release.
4.2	Water		
4.2.1	Removal of the requirement for planning authorities to evaluate and prepare for the impacts of a changing climate to water resource systems at a watershed level when protecting, improving, or restoring the quality and	Water is an important resource and climate change will impact water quality and availability; thus climate change must be accounted for in watershed planning. Furthermore, as the water resource system is integrally linked to the natural	The City recommends maintaining reference to the impacts of a changing climate and also notes that it will be important to assess water-related policies in tandem with the draft Natural Heritage policies.

	quantity of water (2.2.1 PPS 2020)	heritage system, it is important to assess these policies in tandem with the draft natural heritage system policies, when they are published by the Province.	
4.2.3	Amendment to encourage municipalities to undertake watershed planning to inform planning for sewage and water services and stormwater management, and the protection, improvement, or restoration of the quality and quantity of water.	The City supports the addition of this policy, however, municipalities “should” undertake this work, rather than only be encouraged to.	The City recommends strengthening the language by replacing “encourage” with “shall”.
4.3	Agriculture		
	Amendment to encourage planning authorities to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network	The City recommends that the agricultural system approach be required rather than “encouraged”.	The City recommends this policy be stricter to require an agricultural system approach.
4.5	Mineral Aggregate Resources		
4.5.4.2	Removal of conditions that permit complete rehabilitation to an agricultural condition to not be required (2.5.4.1 PPS 2020).	The City recommends maintaining policy language that requires planning authorities to consider other alternatives prior to deeming complete rehabilitation not required.	The City recommends maintaining Policy 2.5.4.1 d. from the PPS 2020:

			“d.) other alternatives have been considered by the applicant and found unsuitable. The consideration of other alternatives shall include resources in areas of Canada Land Inventory Class 4 through 7 lands, resources on lands identified as designated growth areas, and resources.”
4.6	Cultural Heritage and Archaeology		
4.6.1	Protection of “significant” heritage property or cultural heritage landscapes removed (2.6.1 PPS 2020).	Although the PPS does not contain specific requirements that are identified in the <i>Ontario Heritage Act</i> , this change in language underscores the need for municipalities to address listed properties within their heritage register.	The City strongly recommends that the Province reconsider the timeline prescribed in Bill 23 for the review of listed properties.
4.6.2	Amendments to clarify policy language prohibiting development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the archaeological resources have been recovered (2.6.2 PPS 2020).	The City supports the amendment to clarify language emphasizing the need for archaeological assessment and conservation of artifacts.	
4.6.3	Clarification of when development and site alteration may be permitted on adjacent lands to protected heritage property (2.6.3 PPS 2020).	The City supports the amendment to clarify the policy and notes that the definition of adjacent in relation to this policy 4.6.3 in the proposed PPS 2023 should be amended to include contiguous properties and those	The City recommends that the following language be used: “Adjacent means those lands adjoining a protected heritage property or that are directly across from and near to a

		separated from the protected property by a public right of way.	protected heritage property. This includes properties separated by land used as a private or public road, highway, street, lane, trail, right-of-way, walkway, green space, park and/or easement, or an intersection of any of these.”
4.6.4	Removal of requirement for planning authorities to develop and implement cultural plans for conserving cultural heritage (2.6.4 PPS 2020).	Cultural Heritage Master Plans are critical tools for creating a Citywide vision of how cultural heritage can be incorporated into the development and redevelopment processes. This will support a balanced approach to heritage management.	The City recommends policy regarding Cultural Heritage Master Plans be maintained by adding the following language to the existing 4.6.4: “and c) cultural heritage master plans to provide objectives and policies to guide the identification, evaluation, conservation and management of protected heritage resources in the context of land development and alteration.”
4.6.5	Amendment to require planning authorities to engage early with Indigenous communities (2.6.5 PPS 2020).	The City supports the amendment and notes that it aligns with Brampton’s ongoing Archaeological Management Plan. Early engagements with First Nations and Indigenous Communities are one of the recommendations through this plan.	The City recommends that the term Indigenous Communities be replaced by “First Nations and Indigenous Communities” throughout the PPS 2023 and not just for the Cultural Heritage section. The City also notes that the PPS 2023 is lacking in sufficient policies and direction on the nature of the duty to consult

			and the relationship between the Province's responsibilities and those of the municipality's as per Section 35 of the <i>Constitution Act</i> .
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Chapter 5: Protecting Public Health and Safety			
PPS 2023 Chapter Reference	Key proposed change	City comment	Recommendation
	Removal of preamble text (Section 3, PPS 2020)	The preamble text is important to identify the context and policy direction of this section.	The City recommends this content be maintained.
5.1	General Policies for Natural and Human-Made Hazards		
5.1.1	Removal of policy language that requires the Province, planning authorities, and conservation authorities to work together to mitigate potential risks to public health or safety or of property damage from natural hazards, including those that may be associated with the impacts of a changing climate (3.0 PPS 2020).	The language around mitigating potential risk to public health and safety is critically important, including the ongoing and changing risks brought about as a result of climate change. Coordination across the City, Province, conservation authorities, the public and other key stakeholders is critical.	The City recommends “mitigating potential risk to public health or safety or of property damage from natural hazards, including the risks that may be associated with the impacts of a changing climate, will require the Province, planning authorities and conservation authorities to work together” be maintained.
5.3	Human-Made Hazards		
	Removal of policy requiring planning authorities to support, where feasible, on-site and local re-use of excess soil through planning	If soil is not being reused locally then it is being transported, creating GHG emissions.	The City recommends this language remain to support on site and local re-use of excess soil, which will support reduced

	and development approvals (3.2.3 PPS 2020).		GHG emissions and impacts on the environment.
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Chapter 6: Implementation and Interpretation			
PPS 2023 Chapter Reference	Key proposed change	City comment	Recommendation
6.1	General Policies for Implementation and Interpretation		
6.1.4	Removal of requirement for planning authorities to consider a clean and healthy environment and economic vitality of the Province when implementing this Policy Statement (4.5 PPS)	The City notes that the removed policy language regarding a clean and healthy environment and economic vitality is important when implementing this Policy Statement, as the PPS should be balanced with implementing the triple bottom line (social, environmental, and economic health and well-being of a community).	The City recommends that the original language identifying “to support strong communities, a clean and healthy environment and the economic vitality of the Province” be maintained.
	Removal of policy stating the importance of the official plan as a vehicle for implementation of this Policy Statement (4.6 PPS)	Official Plans are the most important vehicles to implement provincial policies, helping to comprehensively balance key priorities and engage residents to help inform how to implement Provincial policy direction, including balancing government priorities.	The City recommends this policy remain, as this provides critical direction on the importance of Official Plans in implementing Provincial policy and comprehensively evaluating the long-term planning for the city.
6.2	Coordination		
6.2.1	Amendments to add that managing growth and development should be integrated with planning for	The City supports the proposed amendments and recommends further coordination policies from the Growth Plan be integrated into the PPS 2023.	

	infrastructure and public service facilities (1.2.1 PPS 2020).		
6.2.2	Amendment to require planning authorities to engage with Indigenous communities early and coordinate on land use matters (1.2.2 PPS 2020)	<p>The City supports the amendment and notes that this is an important change. However, the City notes that consultation and engagement are two different, and equally important priorities to undertake with First Nations and Indigenous communities. Furthermore, in addition to facilitating knowledge-sharing, it is important to specify that Traditional Ecological Knowledge (TEK) sharing will be facilitated as this is the language used by host Nations and speaks to the relationship between land and environment.</p> <p>Early consultation and engagement in these discussions can ensure that trust is established based on collaboration and respect, and that Aboriginal Treaty Rights are guaranteed under the Canadian Constitution.</p>	<p>The City recommends further amending the policy language as:</p> <p>“Planning authorities shall undertake early consultation and engagement with host Nations and Indigenous communities to coordinate on land use planning matters and facilitate (TEK) Traditional Environmental Knowledge-sharing to ensure that potential impacts are identified, considered and included in land use decision-making and that the exercise of Aboriginal or treaty rights is protected.”</p> <p>Furthermore, the City recommends promoting and encouraging the involvement and inclusion of First Nations and Indigenous communities in economic opportunities.</p>
6.2.3 6.2.4 6.2.6	Amendments to encourage planning authorities to engage the public and stakeholders early, collaborate with school boards, and take a	The City supports the proposed amendments.	

	coordinated approach with the Province and other appropriate stakeholders to implement this Policy Statement.		
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Chapter 7: Definitions			
PPS 2023 Definition Reference	Key proposed change	City comment	Recommendation
	“Special Needs Housing” to now be termed “Additional Needs Housing” with no additional amendments to the definition.	The City supports the proposed amendments.	
Adjacent lands	Removal of natural heritage considerations and references.		The City requests all related NHS definitions remain in the PPS 2023 until the fulsome NHS policies have been released for comment.
	Removal of definition of “Affordable”.	The City requests clarity regarding whether a new definition of affordable will be set by the province, or whether municipalities be required to set their own definitions. Removing the definition of ‘affordable’ will lead to inconsistency across the Province. Without clear provincial policy direction, the City’s ability to secure affordable housing will be weakened. The City notes that housing supply is	The City recommends the Province maintain this definition of affordable, as this definition provides a consistent and accurate approach of affordability based on residents’ incomes. Provincial direction on affordability rates and how to address greater depths of affordability based on what residents can actually afford (not what the market can bear) is important to provide secure, safe,

		not the sole challenge of the housing crisis. The appropriate types of housing supply to meet the needs of Brampton's residents is critical.	adequate, and suitable housing for residents in Brampton.
	Removal of definition of "Comprehensive review".	<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>Furthermore, settlement boundary expansions, although no longer something the City can explore, provides the Town of Caledon with the ability to expand significantly across their lands. This does impact the provision of servicing for the City if significant expansions happen outside of a comprehensive review process.</p>	The City recommends the maintenance of the comprehensive review process, ensuring that projections are effectively evaluated with prioritization of supporting intensification, infrastructure, public services and facilities. Settlement boundary expansions should be limited to this time to consider the impacts to these changes, particularly to ensure the delivery of hard and soft infrastructure. The inability to consider cross-jurisdictional issues and impacts through a comprehensive review process leaves the City concerned on how these elements will be properly reconciled and growth will be managed efficiently and effectively.
Complete communities	Amendment to include a definition of "Complete communities"	The City supports the proposed amendments.	
Employment area	Removal of "office" as a permitted use in employment areas	Office nodes should have the same protection policies as other employment areas as they are a significant component of our job base. Aligned with the comments submitted	The City recommends that office remain a protected employment use, or that a new definition be given for office uses throughout the city and specific criteria be applied for non-office uses to ensure

		to the change of definition to employment areas in the <i>Planning Act</i> , the City requests that office remain a protected employment use.	that these other non-industrial employment functions are also protected.
Housing options	Amendments to the types of housing arrangements and forms defined as “housing options”	<p>Affordable housing should not be removed from this definition as this is a critical housing option that Brampton needs more of. This connects to the maintenance of the “affordable” and “low- and moderate-income household” definition that the City requests remain in the PPS.</p> <p>The City supports the addition of multi-generational housing, student housing, culturally appropriate housing, as well as supportive, community and transitional housing.</p>	The City requests that “affordable housing” be maintained in the definition. The City requests the addition of purpose-built rental housing as an integral component of a mix of housing options, including a mix of tenures (both ownership and rental), and growth of the primary rental market.
	Removal of definition of “Low- and moderate-income households”	This definition provides all municipalities clarity on the key income groups requiring affordable housing. It sets the foundation of many of the programs the City develops to target affordable housing need, based on the income of the resident and what they can afford.	The City requests this definition be maintained, as these are critical definitions that support a coordinated approach to evaluating affordability based on residents’ incomes.
Negative impacts	Removal of regard to fish habitat in definition of “negative impacts”		The City requests all related NHS definitions remain in the PPS 2023 until the fulsome NHS policies have been released for comment.
	Removal of the definition of “Provincial plan”	The reason for this removal is not clear - this is an important legislative	The City requests the maintenance of this definition.

		definition to define what constitutes a provincial plan.	
Significant	Removal of natural heritage-related language in definition of “significant”.		The City requests all related NHS definitions remain in the PPS 2023 until the fulsome NHS policies have been released for comment.
	Removal of the following Natural Heritage-related definitions: Coastal wetland; Ecological function; Endangered species; Fish; Fish habitat; Habitat of endangered species and threatened species; Natural heritage features and areas; Natural heritage system; Provincial and federal requirements; Recreation; Threatened species; Valleylands; Wetlands;		The City requests all related NHS definitions remain in the PPS 2023 until the fulsome NHS policies have been released for comment.

	Wildlife habitat; and, Woodlands.		
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A Place to Grow: Growth Plan for the Greater Golden Horseshoe		
Item	Proposed Change	City Recommendation
Intensification and Density Targets	The proposed PPS will encourage (rather than require) LFMs to establish a density target of 50 residents and jobs per hectare, but will not require implementation of these targets. The PPS 2023 will no longer delineate built-up areas and designated greenfield areas, but rather directs municipalities to identify strategic growth areas.	The City recognizes the importance of directing growth through intensification and recommends the requirements set out in the Growth Plan remain and be carried forward in the PPS 2023. The City supports the maintenance of 5.2.4 and 5.2.5 of the Growth Plan to be integrated into the PPS 2023.
Growth Forecasts and Land Needs Assessment Methodology	The Growth Plan identified minimum population and employment forecasts for all upper-tier and single-tier municipalities in the GGH, and a Land Needs Assessment for municipalities to evaluate if they have enough land for the forecasted growth. PPS 2023 does not carry forward both of these concepts. Municipalities will be required to conduct their own growth forecasting moving forward, and the Land Needs Assessment Methodology is removed.	Coordinated and clear provincial guidance is integral to ensure similar approaches are considered in determining the magnitude of growth that can occur in municipalities and how that growth will be accommodated. Leaving municipalities without clear guidance could lead to discrepancies for agencies in how they plan and allocate funds for hard and soft infrastructure. The City recommends that growth forecast and land needs assessment methodologies should be provided by the Province for consistent approaches across the province.
Natural Heritage System Mapping	The Growth Plan sets out mapping by the Province that must be incorporated into Greater Golden Horseshoe Official Plans. As the policies and mapping have yet to be	The City requests that further information be provided in order to understand the full impacts of the changes with the revocation of the Growth Plan and supports the

	provided, it is unclear if this mapping is carried forward.	maintenance of the Natural Heritage System Mapping from the Growth Plan.
Significant Reduction of Transportation Planning Direction & Land Use	The Growth Plan outlines policies identifying that transportation system planning, land use planning and transportation investment be coordinated. It includes direction that the transportation system provides connectivity among modes for moving people and goods to reduce reliance on the automobile and promote transit and active transportation. The PPS 2023 does not adequately maintain these integral policies, nor does it call for the adoption of a complete streets approach like that ascribed to by the City of Brampton.	The City maintains that public transit should be the first priority for transportation infrastructure planning and investment. The City recommends sections 3.2.1 through 3.2.4 of the Growth Plan be maintained to support integrated land use and transportation planning and integrated into the PPS 2023.
Removal of requirement for municipalities to establish targets for affordable ownership and rental housing.	The Growth Plan policy 2.2.6.1 a) identifies the requirement for municipalities to support housing choice through the achievement of the Plan's minimum intensification and density targets by identifying a diverse range and mix of housing options, including ARUs and affordable housing to meet projected needs of current and future residents and to establish targets for affordable ownership housing and rental housing.	These requirements for LFM's to complete this work and implement them through Official Plan policy is important to advocate for new developments to incorporate affordable housing and/or rental housing into their site plans. The City recommends these policies be carried into the PPS 2023.
Removal of policies supporting a mix of unit sizes to accommodate a diverse range of household sizes and incomes.	This policy direction from policy 2.2.6.3 provides important direction to ensure the provision of larger, family-size units.	As many households in Brampton live in multi-generational households, ensuring that family size units are available as the city intensifies is integrally important direction to maintain. The City recommends this policy direction be carried into the PPS 2023.

Streamline of Policies related to Water and Wastewater Systems, Stormwater Management, and Public Service Facilities	Sections 3.2.6, 3.2.7, and 3.2.8 of the Growth Plan are significantly reduced through the PPS 2023, providing detailed direction and policy requirements for planning for infrastructure to support growth.	The City recommends additional policies from the Growth Plan be integrated into the PPS 2023.
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Proposed Approaches to Implementation of the Proposed Provincial Planning Statement		
Implementation Item	Proposed approach	City Recommendation
Effective Date and Transition	The Ministry is proposing to release the final policies for a short period of time before they take effect and are targeting Fall 2023	To effectively address the comments provided and to provide staff the opportunity to comment on the natural heritage policies, additional time will be required to meet the Fall 2023 deadline. Ongoing dialogue with municipal staff is important to support addressing comments and to effectively transition to the final approved PPS.
Timing for Official Plan Updates	Official Plans would be updated as necessary to implement these new policies at the time of their ordinary review cycle	<p>The City appreciates the clarification on timing for Official Plan updates. However, additional information on transitional information on approvals is not clear and requires clarification. Furthermore, this approach sets the timeline to amend Brampton’s Official Plan (“Brampton Plan”) to bring it to conformity with the Region of Peel’s Official Plan, proclaimed elements of Bill 23, and the proposed PPS 2023 by November 2023.</p> <p>The City recognizes that this places a significant burden to meet these timelines, while ensuring consistency with the PPS</p>

		<p>2023. The City requests additional time and clarification on transition to make Brampton Plan consistent with the PPS 2023, Bill 23, and Region of Peel’s Official Plan. The City also recognizes that with the dissolution of Peel, the roles and responsibilities of upper- and lower-tier municipalities will change and will be another facet of transition to account for in the finalization of Brampton Plan.</p>
<p>Official Plan Updates related to Change to the Definition of “Area of Employment”</p>	<p>The change to the definition in the <i>Planning Act</i> of “area of employment” to only those uses that cannot locate in mixed-use areas and require protection against conversion, is proposed to take effect upon proclamation. Time-sensitive official plan updates will be needed to align with the new definition. Furthermore, to maintain the integrity of employment areas that are intended to remain protected over the long-term, municipalities should update their official plans to explicitly authorize the site-specific permission of any existing uses that do not align with the new definition.</p>	<p>The City seeks clarification and reiterates the need for “office” to be within the <i>Planning Act’s</i> definition of area of employment. Major office is an integral part of delivering employment in the city and must be protected. The introduction of sensitive uses without the need for a conversion will lead to the erosion of Brampton’s employment.</p> <p>The City recognizes the important role that “office” uses have in supporting the economic development and growth of the city, providing critical jobs to Brampton residents in support of creating complete communities. The City recognizes that protection for office uses needs to be considered by the province through the <i>Planning Act</i> and the PPS 2023.</p> <p>Furthermore, the City requests additional time for the Official Plan update to ensure the relevant protections for all existing employment areas are sufficiently protected.</p>

<p>Continued Implementation of 2051 Forecasts (at minimum)</p>	<p>Upper-tier municipalities will be expected to continue to use the 2051 forecasts provided by the Province (at minimum) or a higher forecast as determined by the municipality. Lower-tier municipalities would be expected to meet or exceed the growth forecasts allocate to them by the upper-tier. It is expected that moving forward, municipalities in the GGH will conduct their own forecasting of population and employment growth.</p>	<p>The City is concerned regarding the inconsistencies between municipalities that will result across the Province if growth forecasts are not tracked by the Province. Coordination of both hard and soft infrastructure is critical; however it is not clear how this will be delivered with the removal of growth forecasts. Furthermore, this proposal raises additional concerns such as how planning for health care and long-term care will be conducted without growth targets.</p> <p>The City supports maintaining the Region of Peel Official Plan growth forecasts as a minimum, with the potential to contemplate additional growth scenarios through Brampton Plan. However, provincial guidance should be provided to ensure a similar methodology is used to forecast growth across municipalities.</p>
<p>Timing for Changes to Upper-tier Planning Responsibilities</p>	<p>The changes to the <i>Planning Act</i> introduce by Bill 23, removing statutory approval authorities from 7 upper-tier municipalities is not anticipated to be proclaimed and take effect until Winter 2023 at the earliest.</p>	<p>The City requests further information on the elements that will inform the transition of these changes.</p>
<p>Go-Forward Approach to Provincially Significant Employment Zones</p>	<p>The Province is seeking feedback on the need to identify select PSEZs or portions of PSEZs for the sole purpose of protecting lands exclusively for employment uses through an alternative approach.</p>	<p>The City requests the maintenance of the entire Provincially Significant Employment Zone in Brampton. Due to its proximity to Lester B. Pearson Operating Area, it provides key regional employment, as well as goods and services that will reach all of Ontario, Canada and internationally.</p>

		The City supports participating in providing additional feedback to the Province in support of maintaining the PSEZs in Brampton.
Approach to maintain existing Greenbelt Policies	Proposed amendment to the Greenbelt Plan that would indicate that the previous policies in A Place to Grow and the Provincial Policy Statement would continue to apply in those cases where the Greenbelt Plan refers to them to ensure no change to how the Greenbelt Plan policies are implemented if the PPS 2023 comes into effect.	The City requests the maintenance of all relevant Growth Plan policies to ensure that no major changes to the Greenbelt Plan are required and to help manage growth and natural heritage protections across the Greater Golden Horseshoe.



The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed changes.

Sincerely,

Steve Ganesh, MCIP, RPP
Commissioner
Planning, Building & Growth Management