

October 18, 2019

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON
M5G 2E5

Re: Provincial Policy Statement Review (ERO Number: 019-0279)

Dear Provincial Planning Policy Branch:

The City of Brampton appreciates the opportunity to provide comments and feedback on the proposed changes to the Provincial Policy Statement Review, and through this letter, submit our official comments for the Minister's consideration. The City notes that our review and comments are limited only to the official documentation issued by the Ministry of Municipal Affairs and Housing (MMAH) on July 22, 2019 through the Environmental Registry of Ontario website. The four documents collectively form the proposed changes to the Growth Plan and our assessment addresses the key policy changes and their potential impact on the City of Brampton. The key proposed changes are categorized into eight main components described below with detailed policy specific comments included in a table attached as Appendix A.

1. Increasing Housing Supply and Mix

The Province notes that the proposed draft policies for consultation are intended to:

- Increase land supply requirements municipalities must meet:
 - Increase planning horizon from 20 to 25 years
 - Increase housing land supply from 10 to 12 years
 - Allow higher minimum requirement for serviced residential land (5 years) for upper- and single-tier municipalities
- Update provincial guidance to support land budgeting (i.e. Projection Methodology);
- Increase flexibility for municipalities related to the phasing of development and compact form;
- Add flexibility to the process for settlement area boundary expansions (e.g. allow minor adjustments subject to specific tests, highlight that study requirements should be proportionate to the size/scale of development);
- Require transit-supportive development and prioritize intensification, including potential air rights development, in proximity to transit, including corridors and stations;
- Support the development of housing to meet current and future housing needs, and add reference to housing options;
- Support municipalities in achieving affordable housing targets by requiring alignment with Housing and Homelessness Plans; and,
- Broaden PPS policies to enhance support for development of long-term care homes.

The City of Brampton (City) is generally supportive of the proposed policy direction related to increasing housing supply and mix, and note that these principles are already embodied in the City's Official Plan.

However, the City is concerned that certain policy modifications do not comply with other recently passed legislation. For example increasing the planning horizon from 20 to 25 years is in conflict with other provincial documents such as the Growth Plan, which support the 20-year horizon. Other proposed modifications (1.1.3.6 and 1.1.3.7) weaken language that supports compact and phased development in line with other Provincial policies, including some of those within the PPS.

The City notes that there are changes in language within the proposed PPS, which replace requirement terminology “shall” with consideration terminology “should” related to phasing and compact development. This contradicts with the intent of the PPS policies to facilitate transit-related development and intensification, and conflicts with the City’s 2040 Vision.

The City is also concerned with the emphasis on market-based growth and housing options reflecting market demands. This deviates from “good planning” principals as a decision making tool, inherent in the City’s current planning process and the recently endorsed Living the Mosaic Vision 2040. It compromises long-term infrastructure and transportation planning, as unpredictable market demands are prioritized. This is likely to result in a more reactive unstable growth management strategy, driven by a short-term market demand based approach. Such an approach is reflective of past and current patterns rather than future trends; which limits innovation in growth management. Furthermore, this weakens the City’s role in determining planning priorities for growth based on local context and demands rather than a Provincial mandate to priorities market conditions as a key consideration.

2. Protecting the Environment and Public Safety

The Province notes that the proposed draft policies for consultation are intended to:

- Enhance direction to prepare for impacts of a changing climate;
- Enhance stormwater management policies to protect water and support climate resiliency;
- Promote the on-site local reuse of excess soil;
- Maintain current policies related to natural and human-made hazards which direct development away from hazardous areas including flood-prone areas in order to protect public health and safety, while work by the Special Advisor on Flooding is underway;
- Maintain current policies that require municipalities in southern Ontario to identify natural heritage systems, and provide flexibility as to how to achieve this outcome of accurately identifying those natural systems;
- Maintain protections for the Greenbelt.

The City is generally supportive of the proposed revisions related to protecting the environment and public safety, which include climate change preparedness as a consideration throughout the PPS. However, the City recommends that emphasis on mitigation/reduction of elements that contribute to climate change should also be incorporated into the policies.

3. Reducing Barriers and Costs

The Province notes that the proposed draft policies for consultation are intended to:

- Require municipalities to take action to fast-track development applications for certain proposals (e.g. housing);
- Allow mineral aggregate operations to use rehabilitation plans to demonstrate that extraction will have no negative impacts;
- Align the definition of cultural heritage with recent changes to the *Ontario Heritage Act*;

- Refocus PPS energy policies to support a broad range of energy types and opportunities for increased energy supply;
- Direct large ground-mounted solar facilities away from prime agricultural and specialty crop areas; and
- Make minor changes to streamline development approvals and support burden reduction.

The City is concerned with proposed draft policies that require municipalities to fast-track development applications proposals such as housing. It is unclear what "fast-tracking" as an approach would entail and which applications would be given priority status.

Furthermore, this policy may compromise the planning process requirements of the *Planning Act*, as these requirements do require time to be appropriately completed; and is further exacerbated by timelines recently enacted through Bill 108, More Homes, More Choice Act, 2019 for development review. The policy also ignores the role of the development industry in the approvals process. Developers who submit high quality applications and respond quickly to municipal comments see their applications reaching the decision stage faster.

Proposed policy revisions allowing mineral extraction within natural heritage features is an issue noted by the City of Brampton. Although the long-term rehabilitation and its effects on the natural and ecological functions is noted as a pre-requisite, this new policy does not consider the lifecycle impact of such extraction during operation. This may alter the context in which the final rehabilitation assessment is undertaken.

The City is also concerned with changes related to the process for determining cultural heritage value or interest for sites within the City of Brampton. This is likely to undermine the City's authority in determining heritage conservation and protection of cultural heritage assets. The City is best placed in defining these sites and the related processes given the diverse local contexts for each municipality.

The City appreciates the intended goal of this policy revision, but recommends that wording more reflective of increasing and facilitating process efficiencies, in consultation with various stakeholders, be included as a strategic direction of the PPS in the preamble.

4. Supporting Rural, Northern and Indigenous Communities

The Province notes that the proposed draft policies for consultation are intended to:

- Allow flexibility for communities by clarifying perceived barriers to sewage and water servicing policies for lot creation and development in rural settlement areas;
- Enhance municipal engagement with Indigenous communities on land use planning and cultural heritage matters to help inform decision-making, build relationships and address issues upfront in the approvals process; and
- Enhance agricultural protections to support critical food production and the agricultural sector as a significant economic driver.

The City is supportive of policies related to Indigenous communities, particularly the proposed emphasis on meaningful engagement and relationship building with Indigenous communities, and obtaining sufficient input from these communities as part of the planning process. The City recommends additional wording that recognizes existing Provincial Crown responsibilities relevant to consultation with Indigenous communities.

5. Supporting Certainty and Economic Growth

The Province notes that the proposed draft policies for consultation are intended to:

- Encourage municipalities to facilitate conditions for economic investment, and at the time of official plan review or update, assess locally-identified employment areas to ensure designations are appropriate;
- Provide municipalities with greater control over employment area conversions to support the forms of development and job creation that suit the local context (current and future); and
- Provide stronger protection for major facilities such as manufacturing and industrial uses where non-employment uses are planned nearby (i.e. buffering uses from new sensitive uses).

The City agrees with the overall intent of the proposed policies to support certainty and facilitate economic growth. However, The City notes instances of inconsistencies between the proposed policies and recently approved policies of the Growth Plan. For example in proposed policy 1.3.2.5 the criteria for non-employment conversion of lands is not in line with the Growth Plan, and will likely further reduce the viability of currently designated employment lands.

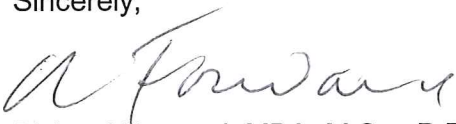
The City also notes that policies related to land use compatibility (1.2.6.1) is a concern as detailed in Appendix A, especially as the proposed language prioritizes economic viability over public health and safety. It is recommended that the original wording be maintained or revised such that public safety and buffering are prioritized over economic viability; reflecting the City's own approach and priorities.

Summary

There are notable inconsistencies in the policy priorities set between the PPS and other Provincial legislation, including other policies within the PPS itself. While there is a direction that limits municipal flexibility and decision making through the uploading specific planning components for Provincial discretion. The City is concerned with this approach, which weakens the authority of local Council decisions based on unique municipal contexts. The City is also concerned with proposed policy revisions that are inconsistent with the City's Vision 2040; including appropriate growth management through phasing and more efficient compact development.

The City of Brampton would like to again thank MMAH for the opportunity to provide feedback on important proposed legislations and hope that the comments and recommendations herein will be taken into serious consideration as part of the policy consultation process.

Sincerely,



Richard Forward, MBA, M.Sc., P.Eng.
 Commissioner of Planning and Development Services
 The Corporation of the City of Brampton
 905-874-2052

Attachments:

Appendix A: Table of Comments on the Proposed Provincial Policy Statement Review

Appendix A - Provincial Policy Statement Review – Proposed Policies

ERO No. 019-0279 Response Matrix

Item #	Section	Proposed Changes	City Comments
1		Part I: Preamble	
1.1		<p>Add: Municipal official plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning. Official plans shall identify provincial interests and set out appropriate land use designations and policies.</p> <p>Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement.</p> <p>Zoning and development permit by-laws are also important for implementation of this Provincial Policy Statement. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and this Provincial</p>	<p>This is an explanatory comment describing the role of the Official Plan and Zoning By-law within the context of implementing the PPS. The City recommends that this be moved to Part V, Section 4 of the PPS related to Implementation and Interpretation.</p>
1.2		<p>Add: In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply. In addition to land use approvals under the Planning Act, infrastructure may also require approval under other legislation and regulations. An environmental assessment process may be applied to new infrastructure and modifications to existing infrastructure under applicable legislation.</p> <p>There may be circumstances where land use approvals under the Planning Act may be integrated with approvals under other legislation, for example, integrating the planning processes and approvals under the Environmental Assessment Act and the Planning Act, provided the intent and requirements of both Acts are met.</p> <p>Within the Great Lakes – St. Lawrence River Basin, there may be circumstances where planning authorities should consider agreements related to the protection or restoration of the Great Lakes – St. Lawrence River Basin. Examples of these agreements include Great Lakes agreements between Ontario and Canada, between Ontario and Quebec and the Great Lakes States of the United States of America, and between Canada and the United States of America.</p>	<p>The City has no comment on this as it awaits further details related to changes of other applicable Acts, such as the Environmental Assessment Act.</p>
2		Part II: Legislative Authority	
2.1		<p>Add: Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government “shall be consistent with” this Provincial Policy Statement.</p>	<p>This has been removed from Part V of the PPS which includes the formal policies of the document to Part II. The concern is that by removing this statement from a numbered policy format to a general statement it will carry less weight as a reference point for local policy compliance. The City recommends that this be included as a defined PPS policy under Part V.</p>
3		Part III: How to Read the Provincial Policy Statement	
3.1		<p>Relationship to other Provincial Plans, Add: The Provincial Policy Statement provides overall policy directions on matters of provincial interest related to land use planning and development in Ontario, and applies province-wide, except where this policy statement or another provincial plan provides otherwise.</p>	<p>The City supports this statement, particularly relevant to the Greenbelt Plan.</p>
3.2		<p>Relationship to other Provincial Plans, Add: [reference to A Place to Grow 2019]</p>	<p>The City has no comment on this housekeeping item.</p>
3.3		<p>Add: Where the policies of provincial plans address the same, similar, related, or overlapping matters as the policies of the Provincial Policy Statement, applying the more specific policies of the provincial plan satisfies the more general requirements of the Provincial Policy Statement. In contrast, where matters addressed in the Provincial Policy Statement do not overlap with policies in provincial plans, the policies in the Provincial Policy Statement must be independently satisfied.</p>	<p>The City supports this clarification in the PPS in light of recent revised Provincial legislation in force through other provincial documents.</p>

4	Part IV: Vision for Ontario's Land Use Planning System		
4.1		Reword: The Province's rich cultural diversity is one of its distinctive and defining features. Indigenous communities have a unique relationship with the land and its resources, which continues to shape the history and economy of the Province today. Ontario recognizes the unique role Indigenous communities have in land use planning and development, and the contribution of Indigenous communities' perspectives and traditional knowledge to land use planning decisions. The Province recognizes the importance of consulting with Aboriginal communities on planning matters that may affect their section 35 Aboriginal or treaty rights. Planning authorities are encouraged to build constructive, cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes and inform decision-making.	The City supports emphasis on Indigenous community engagement and recommends additional wording to recognize existing Provincial Crown responsibilities relevant to Indigenous communities.
4.2		Add: Planning authorities are encouraged to permit and facilitate a range of housing options, including new development as well as residential intensification, to respond to current and future needs.	The City supports the emphasis on a range of housing options and residential intensification for future growth.
4.3		Add: They also permit better adaptation and response to the impacts of a changing climate, which will vary from region to region.	The City supports the addition of the impacts of climate change as a consideration for future growth. We also encourage the inclusion of language explicitly recognizing efficient development patterns as a form of climate change mitigation as well.
4.4		Add: provide for recreational opportunities (e.g. fishing, hunting and hiking)	The City recognize natural heritage resource provide recreational opportunities, but suggest that the flexibility of recreational opportunities be maintained through the removal of the examples provided (e.g. fishing, hunting and hiking)
5	Part V: Policies		
	Building Strong Healthy Communities		
5.1	1.1.1 b)	Reword: accommodating an appropriate market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;	The City is recommends removal of the "market-based" term relevant to range and mix of residential types. Typically market is based on current and past trends and does not take into account the future planning vision (i.e. Council endorsed Brampton's 2040 Vision) that facilitate complete communities. Furthermore how is "market-based" determined, will a market study be required for each development proposal, and the City will be obligated to review specialised market studies as part of the planning process.
5.2	1.1.1 e)	Reword: promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;	The City supports this modification. The inclusion of transit-supportive development (and its association with land use planning and growth management) and the optimization of transit investments will support and promote the use of transit as a viable alternative to the private auto.
5.3	1.1.1 f) to i)	Renumbering i) Adding "preparing for the regional and local" impacts of a changing climate	The City recommends a policy statement regarding reducing the impact of/mitigating the impacts of climate change be added prior to policy i)
5.4	1.1.2	Modify: Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years	The City notes this is a change from the previous 20 year horizon. This goes beyond other provincial legislated horizons (such as A Place to Grow 2019) and the conflict in horizon forecasts will create additional confusion. The City recommends the 20 year horizon be maintained to ensure consistency with other recently passed Provincial policies.

Settlement Areas			
5.5	1.1.3.2	Add: Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.	The City of Brampton has no comment.
		Add: d) prepare for the impacts of climate change	The City supports the addition of impacts of climate change as a consideration for landuse patterns within settlement areas, however the City also recommends a policy statement regarding reducing/mitigating the impacts of climate change be added prior to policy d)
5.6	1.1.3.3	Add: planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs. Remove: Intensification and redevelopment shall be directed in accordance with the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.	The City supports this proposed modification. This addition of "transit-supportive development" wording in this policy complements policy direction in Section 1.1.1 that promotes transit-supportive development. The focus on intensification and transit-supportive development aligns well with the types and locations of growth envisioned for the City in Brampton's Vision 2040 long range plan.
5.7	1.1.3.6	Reword: ...should have a compact form (instead of 'shall')	Suggest maintaining shall and adding "as per local official plans" as compact form is an important future direction to facilitate the City's future vision for appropriate growth. By reducing emphasis on compact form, this contradicts other PPS policies which encourage intensification and compact, transit-supportive growth.
5.8	1.1.3.7	Reword: ...should establish and implement phasing policies (instead of 'shall')	Suggest maintaining shall and adding "as per local official plans" as phasing policies provide more structured and defined sequencing of growth to ensure that appropriate facilities and infrastructure are in place before new/additional development is undertaken. By reducing emphasis on phasing, this contradicts other PPS policies which require consideration for existing or planned infrastructure and public service facilities required to accommodate projected needs.
5.9	1.1.3.8 a)	Reword: ...sufficient opportunities to accommodate growth and to satisfy market demand...	Suggest removing market demand and replacing with 'good planning' in line with other provincial legislations that will look to 'good planning' as a decision making tool. Market demand is short term and limiting to innovation in growth management.
5.10	1.1.3.8 e)	Reword: impacts from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area are avoided, and where avoidance is not possible, impacts are minimized and mitigated to the extent feasible in accordance with provincial guidelines. In undertaking a comprehensive review the level of detail of the assessment should correspond with the complexity and scale of the settlement boundary expansion or development proposal. Remove: In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.	The City of Brampton has no comment as this has no impact on the City.
5.11	1.1.3.9	Added criteria for municipalities to permit adjustments of settlement area boundaries outside a comprehensive review	The City of Brampton has no comment as this has no impact on the City.
Rural Lands in Municipalities			
5.12	1.1.5.2	Add: Agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be promoted and protected in accordance with provincial standards.	The City of Brampton has no comment as this has no impact on the City.
5.13	1.1.5.8	Removed	The City of Brampton has no comment as this has no impact on the City.
5.14	1.1.5.9	Renumber to 1.1.5.8	The City of Brampton has no comment as this has no impact on the City.
Coordination			
5.15	1.2.1 a)-d)	Reworded	The explicit integration of growth and development with infrastructure planning is positive, but appears incompatible with the softening of related policy direction in Section 1.1.3.7.
5.16	1.2.2	Reword: Planning authorities shall engage with Indigenous communities and coordinate on land use planning matters.	The City supports emphasis on Indigenous community engagement. The City recommends additional wording to recognize existing Provincial Crown responsibilities relevant to indigenous communities.

Land Use Compatibility			
5.17	1.2.6.1	Reword: Major facilities and sensitive land uses shall be planned to ensure they are appropriately designed, buffered and/or separated from each other and developed to prevent, avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.	The proposed language prioritises economic viability over public safety and health risks, the City does not support this change in tone and suggest wording that re-emphasises buffering as a priority.
5.18	1.2.6.2	Add: Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall ensure that the planning and development of sensitive land uses adjacent to existing or planned industrial, manufacturing, or other uses that are particularly vulnerable to encroachment are only permitted if: a) alternative locations for the proposed sensitive land uses have been evaluated and there are no reasonable alternative locations; and b) potential impacts of these uses are minimized and mitigated in accordance with provincial guidelines, standards and procedures.	The City of Brampton has no comment.
Employment			
5.19	1.3.1 c)	Add: facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;	The City of Brampton supports this addition, however the City recommends that additional wording be included to avoid potential misinterpretation as follows: "without impact on PPS policies that protect natural and cultural heritage resources and other priorities of the PPS".
5.20	1.3.1 c)-d)	Renumber to d) and e)	The City has no comment on this housekeeping item.
5.21	1.3.2.2	Add: At the time of the official plan review or update, planning authorities should assess employment areas identified in local official plans to ensure that this designation is appropriate to the planned function of the employment area. Employment areas planned for industrial and manufacturing uses shall provide for separation or mitigation from sensitive land uses to maintain the long-term operational and economic viability of the planned uses and function of these areas.	The City supports this additional wording.
5.22	1.3.2.3	Add: Within employment areas planned for industrial and manufacturing uses, planning authorities shall prohibit residential and institutional uses that are not ancillary to the primary employment uses in order to maintain land use compatibility. Employment areas planned for industrial and manufacturing uses, should include an appropriate transition to adjacent non-employment areas.	Prohibited uses should also include retail uses that are not ancillary to the primary employment uses.
5.23	1.3.2.5	Add: Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally-significant by a regional economic development corporation working together with affected upper- and single-tier municipalities and subject to the following: a) there is an identified need for the conversion and the land is not required for employment purposes over the long term; b) the proposed uses would not adversely affect the overall viability of the employment area; and c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.	The City is concerned with the potential impact of this policy, reflective of the A Place To Grow 2019 Plan. The added flexibility to convert employment uses to non-employment prior to an Official Plan review reduces the protection of employment lands and increases the vulnerability of employment land loss overall. This contradicts PPS policies that aim to enhance protection of employment lands to maintain their feasibility and viability (i.e. 1.3.2.3).
5.24	1.3.2	Renumber sections to incorporate added items	The City has no comment on this housekeeping item.
Housing			
5.25	1.4.1	Add: Upper-tier and single-tier municipalities may choose to maintain land with servicing capacity sufficient to provide at least a five-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.	The City of Brampton is unclear why the time-frame of 5 years has been added. It is unclear how this policy affects more urbanized cities such as Brampton with diminishing Greenfield areas.
5.26	1.4.3	Reword: Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based needs of current and future residents of the regional market area.	The City is concerned with emphasis on "market-based" needs. Typically market is based on current and past trends and does not take into account the future planning vision (i.e. Council endorsed Brampton 2040 Vision) that facilitate complete communities. The methodology of how "market-based" determined, will a market study be required for each development proposal, and the City will be obligated to review specialised market studies as part of the planning process.

5.27	1.4.3 b)	<p>Reword: permitting and facilitating:</p> <ol style="list-style-type: none"> 1. all forms of housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and 2. all forms types of residential intensification, including second additional residential units, and redevelopment in accordance with policy 1.1.3.3; 	The City of Brampton has no comment.
5.28	1.4.3 e)	<p>Added: requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations;</p>	The City supports this modification.
5.29	1.4.3 f)	<p>Renumber e) to f)</p>	The City has no comment on this housekeeping item.
Infrastructure and Public Service Facilities			
5.30	1.6.1	<p>Reword: Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs. Planning for infrastructure, and public service facilities shall be coordinated and integrated with land use planning and growth management...</p>	Clarification would be welcomed as to the reasoning behind the removal of the terms "coordinated" and "cost effective". Coordination (e.g. between the Region of Peel and Brampton or between the school boards and Brampton) is key to growth management and the timely availability of infrastructure and services. The cost of infrastructure can influence/dictate where and when growth occurs and building infrastructure or providing services before they are needed is a drag on municipal budgets.
Sewage, Water and Stormwater			
5.31	1.6.6.1 b)	<p>Reword: ensure that these systems are provided in a manner that:</p> <ol style="list-style-type: none"> 1. can be sustained by the water resources upon which such services rely; 2. prepares for the impacts of a changing climate; 3. is feasible and financially viable over their lifecycle; and 4. protects human health and safety, and the natural environment; 	The City of Brampton has no comment.
5.32	1.6.6.1 e)	<p>Add: For clarity, where municipal sewage services and municipal water services are not available, planned or feasible, planning authorities have the ability to consider the use of the servicing options set out through policies 1.6.6.3, 1.6.6.4, and 1.6.6.5 provided that the specified conditions are met.</p>	The City of Brampton has no comment.
5.33	1.6.6.2	<p>Reword: Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	The City of Brampton has no comment.
5.34	1.6.6.3	<p>Reword: Where municipal sewage services and municipal water services are not available, planned or feasible private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety.</p>	The City of Brampton has no comment.
5.35	1.6.6.4	<p>Reword: Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. In settlement areas, individual on-site sewage services and individual on-site water services may be used for infilling and minor rounding out of existing development. Add: At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the character of rural settlement areas. Where planning is conducted by an upper-tier municipality, the upper-tier municipality should work with lower-tier municipalities at the time of the official plan review or update to assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the desired character of rural settlement areas and the feasibility of other forms of servicing set out in policies 1.6.6.2 and 1.6.6.3.</p>	The City of Brampton has no comment.

5.36	1.6.6.5	Add: Where partial services have been provided to address failed services in accordance with subsection (a), infilling on existing lots of record in rural areas in municipalities may be permitted where this would represent a logical and financially viable connection to the existing partial service and provided that site conditions are suitable for the long-term provision of such services with no negative impacts. In accordance with subsection (a), the extension of partial services into rural areas is only permitted to address failed individual on-site sewage and individual on-site water services for existing development	The City of Brampton has no comment.
5.37	1.6.6.7 a)	Add: be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term	The City of Brampton has no comment.
5.38	1.6.6.7 a)-e)	Renumber to b)-f)	The City has no comment on this housekeeping item.
5.39	1.6.6.7 c)	Reword: minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater;	The City is supportive of additional language that increases the preparedness of the impacts of climate change.
5.40	1.6.6.7 d)	Reword: mitigate risks to human health, safety, property and the environment	The City supports this modification.
5.41	1.6.6.7 e)	Add: ...water conservation and efficiency, ...	The City supports this modification.
Transportation Systems			
5.42	1.6.7.2	Reword: Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	The City recommends that the original wording is maintained as "shall" rather than "should" in line with other PPS policies that promote compact development, intensification and integrated planning for growth.
5.43	1.6.7.5	Remove: Transportation and land use considerations shall be integrated at all stages of the planning process.	The City of Brampton strongly feels that both transportation and land use planning are integral components of the planning process - the two must be closely integrated - and recommends that this policy be maintained. Transportation planning is necessary to ensure appropriate and resilient development growth in line with a range of Provincial policies such as the A Place to Grow 2019 document and other policies of the PPS.
Transportation and Infrastructure Corridors			
5.44	1.6.8.5	Add: The co-location of linear infrastructure should be promoted, where appropriate.	The City supports this modification.
5.45	1.6.8.5	Renumber to 1.6.8.6	The City has no comment on this housekeeping item.
Waste Management			
5.46	1.6.10.1	Remove: Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion.	The City discourages the removal of this language. Waste prevention and reduction is a priority for the Province's as exhibited in it's "Made In Ontario Environmental Plan" and the "Strategy for a Waste-Free Ontario: Building the Circular Economy". The construction industry is a major source of waste. The PPS serves as a significant policy tool to promote a minimization of waste generation and diversion of the development industry and assist the Province in achieving its waste reduction objectives.
Energy Supply			
5.47	1.6.11.1	Reworded: Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and renewable energy systems and alternative energy systems to accommodate current and projected needs.	The City of Brampton has no comment.
5.48	1.6.11.2	Remove: Planning authorities should promote renewable energy systems and alternative energy systems where feasible, in accordance with provincial and federal requirements.	The City of Brampton has no comment.
Long-Term Economic Prosperity			
5.49	1.7.1 b)	Add: encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;	The City supports this modification, however emphasis on market-based housing should be exclusive of planning decisions in light of its short term variability. Therefore, the City recommends rewording from "dynamic market-based needs" to "dynamic needs" only. (Can services and infrastructure respond in a timely fashion to dynamic market-based needs? Does subsection (b) align with direction in Section 1.6.1?)
5.50	1.7.1 b)-k)	Renumber to c) -l)	The City has no comment on this housekeeping item.
5.51	1.7.1 i)-j)	Reword: i) sustaining and enhancing the viability of the agricultural system through protecting agricultural resources, minimizing land use conflicts, providing opportunities to support local food, and maintaining and improving the agri-food network; j) promoting energy conservation and providing opportunities for increased energy supply;	The City recommends maintaining the text referencing the development of renewable and alternative energy systems, including district energy, to encourage the exploration and development of cleaner energy and integrated community energy systems that result in local cost saving and economic development, emission reductions, as well as climate change resiliency.

Energy Conservation, Air Quality and Climate Change			
5.52	1.8.1	Reword: ...and preparing for impacts of a changing climate through...	The City supports this modification and recommends adding "and reducing/mitigating" subsequent to "preparing". (Would like to see stronger wording than "encourage" in subsection (e) - this would better align this subsection with earlier policy direction such as Section 1.1.3.3.)
5.53	1.8.1 e)	Add: encourage transit-supportive development and intensification to ...	The City supports this modification.
5.54	1.8.1 f)	Remove: maximizes opportunities for the use of renewable energy systems and alternative energy systems	The City discourages the removal of this language. Creating communities that are prepared for climate change includes increasing renewable energy and alternative energy systems, and policy language that encourages this energy transition should be maintained.
Natural Heritage			
5.55	2.1.10	Add: Municipalities may choose to manage wetlands not subject to policy 2.1.4 and 2.1.5, in accordance with guidelines developed by the Province.	The City supports the opportunity to protect locally significant wetlands, and requests that the Province consult with the municipalities on the guidelines being developed by the province.
Water			
5.56	2.2.1 c)	Add: evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;	The City supports this modification.
5.57	2.2.1 c)-h)	Renumber to d)-i)	The City has no comment on this housekeeping item.
5.58	2.3.2	Add: Planning authorities are encouraged to use an agricultural system approach to maintain and enhance the geographic continuity of the agricultural land base and the functional and economic connections to the agri-food network	The City of Brampton has no comment as this has no impact on the City.
Agriculture			
5.59	2.3.3.3	Add: ...in prime agricultural areas...	The City of Brampton has no comment as this has no impact on the City.
5.60	2.3.6.1 a)	Remove: ...in accordance with policies 2.4 and 2.5...	The City of Brampton has no comment as this has no impact on the City.
5.61	2.3.6.1 b)	Remove: the proposed use complies with the minimum distance separation formulae; Renumber subpoints 3-4 to 2-3	The City of Brampton has no comment as this has no impact on the City.
5.62	2.3.6.2	Reword: Impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be avoided, and where avoidance is not possible, minimized and mitigated to the extent feasible and informed by provincial guidelines.	The City of Brampton has no comment as this has no impact on the City.
Mineral Aggregate Resources			
5.63	2.5.2.2	Add: Outside of the Greenbelt Area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions.	The City of Brampton has no comment.
5.64	2.5.2.4	Add: Where the Aggregate Resources Act applies, processes under the Aggregate Resources Act shall address the depth of extraction of new or existing mineral aggregate operations or their expansions.	The City of Brampton has no comment.
Cultural Heritage and Archaeology			
5.65	2.6.5	Reword: Planning authorities shall engage with Indigenous communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources.	The City welcomes the Provincial direction to engage with Indigenous communities when identifying, protecting and managing cultural heritage and archaeological resources. The City recommends additional wording to recognize existing Provincial Crown responsibilities relevant to indigenous communities.
Protecting Public Health and Safety			
5.66	3.0	Add: (Note: policies in this section related to natural hazards are subject to ongoing review by the Province's Special Advisor on flooding. Further changes may be considered as a result of this review)	The City of Brampton has no comment.
5.67	3.1.3	Reword: Planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards.	The City supports this modification.
5.68	3.2.3	Add: Planning authorities should support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.	The City of Brampton has no comment.

Implementation and Interpretation			
5.69	4.2	Removed (moved to the Preamble): In accordance with Section 3 of the Planning Act, a decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Municipal Board, in respect of the exercise of any authority that affects a planning matter, "shall be consistent with" this Provincial Policy Statement.	The City of Brampton believes that this statement should remain under this section rather than the proposed shift of the text to the Preamble. There may be legal implications of removing such fundamental policy into a strategic high-level preamble that does not officially form part of the policy text of the PPS.
5.70	4.4, 4.6	Reword: This Provincial Policy Statement shall be implemented in a manner that is consistent with Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms. Removed: 4.6 (repeated)	The City of Brampton believes that this statement should remain under this section rather than the proposed shift of the text to the Preamble. There may be legal implications of removing such fundamental policy into a strategic high-level preamble that does not officially form part of the policy text of the PPS.
5.71	4.7	Remove: Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. Re-number to 4.6	The City of Brampton believes that text noted should be maintained under this section rather than the proposed shift of the text to the Preamble. Having the text as a numbered policy of the PPS strengthens its value for local decision making processes and legal planning justification.
5.72	4.8-4.13	Remove: (Sections in their entirety)	The City of Brampton believes that text noted should be maintained under this section rather than the proposed shift of the text to the Preamble. Having the text as a numbered policy of the PPS strengthens its value for local decision making processes and legal planning justification.
5.73	4.7	Add: Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for local development by: a) identifying and fast-tracking priority applications which support housing and job-related growth and development; and b) reducing the time needed to process residential and priority applications to the extent practical.	This policy should be removed. It provides an open interpretation of "priority applications" and further enshrines a blanket assumption of municipal delays in decision making and planning matters. If the Province wishes to facilitate a more efficient development process, than this is more appropriately noted in the preamble as an overarching approach rather than the policy section of the PPS. Fast tracking has not be sufficiently clarified or what is entailed for this particular approach. Furthermore, this will compromise the planning process requirements of the Planning Act to be undertaken within an appropriate time.
5.74	4.14-4.15	Re-number to 4.8-4.9	The City has no comment on this housekeeping item.
5.75	4.9	Reword: Municipalities are encouraged to monitor and report on the implementation of the policies in their official plans, in accordance with any reporting requirements, data standards and any other guidelines that may be issued by the Minister.	The City is concerned that the proposed revision appears to take decisions and flexibility away from the municipalities on how and what to monitor, thereby removing/limiting local context. There is a lack of clarity what the proposed guidelines would entail and what the expectation is in the absence of such guidelines.
Definitions			
5.76	6.0	Add: Agricultural System, Agri-food network, Greenbelt Area, Housing Options, Impacts of a changing climate.	<p>Definition of "impacts of climate change" are broad and far reaching, and not limited to extreme weather events and increased variability. It is recommended that the words "but not limited to" be added following the word "including".</p> <p>The City of Brampton recommends an additional definition for the term "mitigation" use to its significant use throughout the PPS and the possible interpretation variation associated with it.</p>
5.77	6.0	Modify: Areas of archaeological potential, Built heritage resource, Conserved, Cultural heritage landscape, Endangered species, Habitat of endangered species and threatened species, Heritage attributes, Major facilities, Municipal sewage services, Municipal water services, Negative impacts, On-farm diversified uses, Partial services, Planned corridors, Provincial and federal requirements, Residential intensification, Significant, Special needs, Threatened species, Transit-supportive.	<p>Cultural heritage landscape: In order to be consistent with the definition of 'built heritage resource', include wording that cultural heritage landscapes can be included on local and provincial registers.</p> <p>Heritage attributes: In order to be more consistent with the rest of the document and to maintain consistency with the Standards and Guidelines for the Conservation of Historic Places in Canada, reword the first sentence of the definition as follows: "means the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and that must be conserved."</p> <p>Significant: As it relates to cultural heritage and archaeology (e), the definition has been changed to specify that the "Processes for determining cultural heritage value or interest are established by the Province under the authority of the Ontario Heritage Act. National and international criteria are established by certifying bodies."</p> <p>Reference to section e) of this definition, relating to cultural heritage and archaeology, has also been removed from the second last paragraph of the definition, "Criteria for determining significance for the resources identified in section [c] and [d] are recommended by the Province, but municipal approaches that achieve or exceed the same objective may also be used." While this change in principle provides more consistency across the province as regards what is defined as significant, the changes in this definition as they relate to cultural heritage further reduce the ability of municipalities to determine what heritage conservation means and to protect the cultural heritage assets within their own boundaries.</p>