



Date: July 31, 2023

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 (updated June 16, 2023 to provide notice that natural heritage policies have been added)

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.

These comments are applicable to the June 16, 2023 update, which added the natural heritage policies.

The City is supportive of the Province’s proposal to keep the natural heritage policies and related definitions similar to those currently within the PPS 2020. However, the City provides a number of recommendations below in response to the proposed changes related to the Natural Heritage policies and subsequent loss of the Growth Plan policy direction.

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).

Provincial Planning Statement, 2023:

Vision			
PPS 2023 Chapter Reference	Key proposed change	City Comment	Recommendation
Vision	Proposal to add text to state that more than anything, a prosperous Ontario will see the building of more homes for all Ontarians.	Although the City supports the Province's aim to increase housing supply, it must take a balanced approach and a strong, competitive economy, and a clean and healthy environment should be given equal importance.	The City recommends that the PPS 2023 include language which demonstrates that strong communities, a clean and healthy environment, and a strong economy are inextricably linked.
	Proposal to remove reference to the fact that the Province's natural heritage resources provide important environmental, economic and social benefits	It is important to demonstrate why natural heritage resources are essential by linking to the environmental, economic, and social benefits that the NHS provides to the greater vision for the province.	The City recommends maintaining the language around natural heritage resources providing environmental, economic, and social benefits.
	Proposal to move reference to resources being managed in a sustainable way to conserve biodiversity and protect essential ecological processes from the Vision to Section 2.5 Rural Areas in Municipalities	The City notes that conserving biodiversity and protecting essential ecological processes applies to all areas, not just rural areas.	The City recommends maintaining the language around sustainable ways to conserve biodiversity and protect essential ecological processes within the Vision.
	Proposal to keep reference to impacts of climate change only within the Vision and Section 2.9 Energy Conservation, Air Quality and Climate	Staff appreciate the statement in the vision that risks associated with the impacts of climate change will be mitigated. However, any mention of preparing for the impacts of climate change have been removed from	The City recommends maintaining the language related to climate change throughout all sections of the PPS 2023.

	Change, and 5.2 Natural Hazards	individual sections of the document and appear only in section 2.9 Energy Conservation, Air Quality and Climate Change and 5.2 Natural Hazards. The proposed change does not effectively integrate preparing for the impacts of climate change throughout all topics within the PPS. In order to effectively address climate change, we must consider it in all elements of decision-making for the use of land/resources	
	Proposal to remove reference to the fact that a clean and healthy environment and a strong economy are inextricably linked	While the proposed PPS does state that a prosperous Ontario will support a strong and competitive economy and a clean and healthy environment, the statement that a clean and healthy environment and a strong economy are inextricably linked is equally important to clearly identify.	<p>The City recommends maintaining the language around the linkage between protection of the environment and a strong economy.</p> <p>The City requests clarification from the Province on how the environment and economy will be effectively balanced.</p>

Chapter 7: Definitions

PPS 2023 Definition Reference	Key proposed change	City comment	Recommendation
Watershed planning	Addition of new definition	<p>Watershed Planning was not previously defined in the PPS 2020, but was defined in the Growth Plan. As the Growth Plan policies are not integrated into the PPS 2023, the City is supportive of including this definition in the PPS 2023. In the Growth Plan, the definition provided for the protection, enhancement, or restoration of water resources. However, the definition in the PPS 2023 only includes the protection of water resources. The Growth Plan also included a description of what watershed planning typically includes, which is missing from the definition in the PPS 2023. The missing items are critical for effective watershed planning.</p>	<p>The City supports this definition brought forward from the Growth Plan into the PPS 2023, however request that the wording more closely resemble the definition in the Growth Plan, include a description of what watershed planning typically includes, and include a reference to consideration of the impacts of a changing climate and severe water events.</p>
Water resource systems	Addition of new definition	<p>Water Resource Systems was not previously defined in the PPS 2020, but was defined in the Growth Plan. As the Growth Plan policies are not integrated in the PPS 2023, the City is supportive of including this definition in the PPS 2023.</p> <p>The Growth Plan definition of water resource system includes water resources necessary to sustain human water consumption while the 2023 PPS definition does not.</p>	<p>The City supports this definition being brought forward from the Growth Plan into the PPS 2023, however request that the wording include mention of human water consumption to reinforce the importance of the water resource system to humans</p>

A Place to Grow: Growth Plan for the Greater Golden Horseshoe:

Chapter 4: Protecting what is valuable			
Growth Plan Reference	Key proposed change	City comment	Recommendation
4.2.2	Natural Heritage System		
4.2.2.1	Removal of mapping of the Natural Heritage System for the Growth Plan	The City is concerned about the loss of Natural Heritage System mapping through the Growth Plan. Each municipality may not utilize the same methodology to ensure connectivity across the greater NHS system, which could lead to reduced linkages and increased disruptions to the greater NHS system with the absence of comprehensive mapping, as currently provided in the Growth Plan.	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 on Natural Heritage System mapping, to ensure that this does not lead to any erosion of the NHS as a whole. Further the City requests clarification regarding what is permitted to be mapped if municipalities are to undertake their own methodology for NHS mapping. If municipalities are only permitted to map significant features, this leaves out a large portion of the NHS that is not significant but that is currently protected through policies within Official Plans as a result of the Growth Plan.
4.2.2.2	Removal of requirement for municipalities to incorporate the Natural Heritage System for the Growth Plan as an	Further to the above comments related to NHS mapping, the integrated, systems planning of the NHS will be lost in the absence of detailed mapping. In addition, removing language around developing appropriate policies that	The City requests clarification be provided about whether municipalities may provide stronger policy language in their Official Plan policies around maintaining, restoring, or enhancing the NHS

	<p>overlay in official plans, and apply appropriate policies to maintain, restore, or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features and areas</p>	<p>will maintain, protect, restore and enhance the NHS and replacing it with more general language in the PPS (e.g., “should be maintained, restored or, where possible, improved”) weakens its strength and also makes it difficult to understand whether municipalities will be able to implement strong “shall/will” policies in their Official Plans .</p>	
<p>4.2.2.3</p>	<p>Removal of policies regulating the conditions for development or site alteration within the NHS</p>	<p>The proposed PPS 2023 policies prohibit development or site alteration within significant natural heritage features and areas, however this is not sufficient to protect the entirety of the NHS.</p> <p>The intent of the policy is to protect the long-term ecological function and biodiversity of the natural heritage system. The definition provided of natural heritage system within the PPS 2023 identifies ‘other natural heritage features’, which could be interpreted to include non-significant natural heritage features. This is not included within the ‘natural features and areas’ definition. In addition,</p>	<p>The City requests clarification on whether municipalities are still able to manage/protect natural heritage features not identified as significant, including environmental buffers, in the PPS 2023.</p>

		environmental buffers are not included within the definition.	
4.2.2.4, 4.2.2.5	Removal of policies regarding implementation of provincial mapping of the Natural Heritage System for the Growth Plan	See comments above related to NHS mapping.	The City requests further information be provided in order to understand the full impacts of the changes with the revocation of the Growth Plan on Natural Heritage System mapping, to ensure that this does not lead to any erosion of the NHS as a whole
4.2.2.6	Removal of requirement for municipalities to continue to protect an other NHS features or identify new NHS systems	This policy should remain as it provides strength in helping municipalities to continue to protect NHS features. Furthermore, through the development process, an EIS can help to identify new systems and also refine information on NHS systems, which makes keeping these policies important.	The City maintains that this Growth Plan policy language be included within the PPS 2023 as a key principle for complete communities through the long-term protection of the NHS.
4.2.2.7	Removal of policy regulating settlement area expansions into the NHS	The loss of guidance for settlement area expansions into the NHS creates a major gap in the protection of the NHS.	The City maintains that this policy language be included within the PPS 2023.
4.2.3	Key Hydrologic Features, Key Hydrologic Areas, and Key Natural Heritage Features		
4.2.3.1	Removal of the concept of key hydrologic features, and areas and removal of detailed policies	The proposed definition for natural heritage system within the PPS 2023 speaks to areas that support hydrologic function, however it doesn't mention hydrologic features. This is concerning as it would mean	While this specific policy applies to areas outside of settlement areas, the City requests clarification on whether municipalities would still be able to protect and manage key hydrologic features and areas as well as key

	that permit or prohibit certain types of development or site alteration with key hydrologic features, and areas, and key natural heritage features	that hydrologic features that are currently protected would be open for development.	natural heritage features. It is recommended that hydrologic features be included in the PPS.
4.2.3.2	Removal of direction for large-scale development outside of settlement areas proposed within a key hydrologic area		The City recommends direction be provided for large scale development outside of settlement areas within a key natural heritage feature/hydrologic area to ensure any impacts on key hydrologic features/areas and key natural heritage features have been avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated
4.2.4	Lands adjacent to Key Hydrologic Features and Key Natural Heritage Features		
4.2.4.1	Removal of policy regulating development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System for the Growth Plan or a key hydrologic feature	See comment above related to development within a key hydrologic/natural heritage feature	The City recommends that direction be provided for development adjacent outside of settlement areas proximate to key natural heritage features and key hydrologic areas to ensure any impacts on key natural heritage features and key hydrologic areas have been avoided or, if avoidance is not possible, minimized, and to the extent feasible, mitigated.

4.2.4.2	Removal of requirement for municipalities to identify any additional restrictions to be applied before, during, and after development to protect the hydrologic functions and ecological functions of key hydrologic and key natural heritage features	Empowering municipalities to ensure the long-term protection of the hydrologic and ecological functions of key hydrologic and key natural heritage features is an important step throughout the development process.	The City requests that the proposed 2023 PPS include language related to additional restrictions to be applied before, during, and after development to protect the hydrologic functions and ecological functions of the feature.
4.2.4.3	Removal of policy regulating development and site alteration within vegetation protection zone, and removal of definition of vegetation protection zone	A vegetated buffer area surrounding a key natural heritage feature or key hydrologic feature. (Greenbelt Plan)	The City recommends the definition and policy be maintained as it is found within Brampton Plan.



In addition, to help support municipalities, the City of Brampton suggests that the Province provide comprehensive implementation guidance to assist with consistency in interpreting the PPS 2023.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Ganesh".

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