

Review of proposed policies for a new provincial planning policy instrument (PPS, 2024)

Provincial Comment Period Closes May 12, 2024 (ERO: [019-8462](#))

Proposed Changes	Potential City Impacts	Comments to Province
Provincial Planning Statement April 2024		
<p>Vision The Provincial Planning Statement (or “PPS 2024”) proposes a vision for planning in Ontario that emphasizes increased housing supply with a mix of housing options and the creation of complete communities.</p> <p>The previous Growth Plan provided a regional planning focus with a clear urban structure that aligned growth with the efficient use of existing infrastructure, the creation of prosperous and strong economy, and the protection of the Greater Golden Horseshoe’s (GGH’s) fragile ecosystem has significantly changed.</p> <p>The previous vision to direct development away from areas of natural and human-made hazards would be deleted; and instead, the vision would indicate that potential risks to public health and safety or of property damage from natural and human made-hazards, including the risks associated with climate change, should be mitigated. References related to strong,</p>	<ul style="list-style-type: none"> • The proposed vision focuses on the provision of market housing while diminishing the current vision for land conservation, a regional growth management concept, and protections to sustainable resource management and the natural environment. References to the conservation of biodiversity, land and resources, protection of essential biological processes, climate change response and resilience would be deleted or significantly weakened. • Mississauga supports provincial efforts to create more housing, a greater mix of housing and efforts to make home ownership and renting more affordable. • The City of Mississauga (City) seeks to strike a balance between housing development and the generation of economic prosperity, the protection of the natural environment, the provision of community facilities, efficient use of infrastructure, and the preservation of cultural heritage resources. • The City continues its reconciliation efforts. The process of reconciliation entails re-evaluating 	<ul style="list-style-type: none"> • The City supports efforts to increase housing supply. The City recognizes that solving the housing affordability crisis will take significant effort, bold moves from all those involved in housing approval and development, and innovative approaches to planning and construction. • Measures to expedite housing supply should balance different planning priorities. The Province of Ontario (Province) should not implement measures that would generate short-term benefits while creating long-term negative impacts on the natural environment, agricultural systems, infrastructure and transit delivery, economic prosperity, and the creation of complete communities. • While it is important to create-more housing in the GGH, new developments should not undermine access to services and jobs near where residents live, and that major cost savings can be achieved by coordinating growth and infrastructure delivery.

Proposed Changes	Potential City Impacts	Comments to Province
<p>liveable and healthy communities that promote and enhance human health and social well-being and are economically environmentally sound have also been deleted. This has been replaced with the concept of complete communities with increased access to housing, employment, schools, transportation, recreation, public spaces and services that are equitable and sustainable for all.</p> <p>Language has been included to have meaningful early engagement and relationship building between planning authorities and Indigenous communities.</p>	<p>standard practices that regulate municipal procedures and listening to difficult truths. The City collaborates with Indigenous communities to determine what constitutes significant engagement for them. Staff have early and frequent communications and meetings with Indigenous communities, and organizations to discuss matters of mutual interest and a variety of City initiatives and projects, such as the comprehensive Official Plan Review.</p> <ul style="list-style-type: none"> The proposed vision removes reference to "healthy, liveable and safe" communities and replaces it with "complete". The complete communities definition does not explicitly reference walkability and there should be consideration for the needs of the populations to be healthy, as found by numerous health networks (e.g. the UTM Network for Healthy Populations). 	<p>Request to the Province:</p> <ul style="list-style-type: none"> Redefine complete communities to include "healthy, liveable and safe", or revise vision to include this language.
<p>Growth Management PPS, 2024 would shift how growth planning has operated since the introduction of the 2006 Growth Plan. The elimination of growth allocations, intensification targets and minimum greenfield densities, the ability to expand settlement areas at any time, and allowing private amendments to employment areas would significantly shift how, where and when municipalities grow.</p>	<ul style="list-style-type: none"> The proposed changes could significantly increase servicing costs and create fragmented communities, while reducing achievement of creating complete communities. This could divert service improvements away from already established urban areas and growth areas, such as the Downtowns and the Major Transit Station Areas to service fragmented communities. Municipalities have limited resources for servicing and would need to optimise improvements to be cost effective. 	<ul style="list-style-type: none"> The changes would make it more difficult to align growth with infrastructure planning. <p>Request to the Province:</p> <ul style="list-style-type: none"> Carry forward policies that: <ul style="list-style-type: none"> relate to building strong, healthy communities, and managing and directing land use; and allow growth to be tied to the efficient use of existing and planned infrastructure.
<p>Planning for People and Homes</p>	<ul style="list-style-type: none"> The Region of Peel and the lower-tier municipalities are currently working on updating the approved 	<ul style="list-style-type: none"> City staff support the Province allowing municipalities to keep using the approved

Proposed Changes	Potential City Impacts	Comments to Province
<p>Population and growth forecasts will be based on Ministry of Finance 25-year projections. Municipalities will have the option to continue using previous forecasts issued by the Province.</p> <p>Planning authorities will be required to plan for a minimum of 20 years, but not more than 30 years with planning allowed to extend beyond this horizon for infrastructure, public service facilities, strategic growth areas and employment areas.</p> <p>Development potential resulting from a Minister Zoning Order would be in addition to the projected forecast over the planning horizon in the Official Plan and would be required to be incorporated into official plans and associated infrastructure plans.</p> <p>Planning authorities will be required to maintain a 15-year residential land supply that is designated and available for residential development.</p> <p>PPS 2024 removes the concept of “healthy, livable and safe communities” and instead provides that “planning authorities should support the development of complete communities.”</p>	<p>2051 Growth Forecasts to incorporate new immigration targets and the Provincial Housing Pledges, among other factors. Approved forecasts are used to plan for infrastructure delivery, transit, parks, and community services and facilities (including fire and emergency services).</p> <ul style="list-style-type: none"> In-effect Growth Plan targets would be deemed “a minimum”, which may create uncertainty and delays in infrastructure delivery (e.g. transit, parks, and community services and facilities planning). 	<p>growth forecast to 2051 as this forecast is already being used for infrastructure master planning.</p> <ul style="list-style-type: none"> There are associated risks with using the Ministry of Finance 25-year projections to forecast growth that may not consider land supply and water and wastewater servicing constraints. Every municipality will be adopting their individual approaches to forecasting with the potential for inconsistencies and without considering overall growth in southern Ontario. <p>Request to the Province:</p> <ul style="list-style-type: none"> Confirm what assumptions are included in Ministry of Finance 25-year projections (e.g. servicing and land supply). Provide a growth forecasting methodology to ensure consistency between municipalities. Re-insert the following policies and/or wording: <ul style="list-style-type: none"> Promoting development and land use patterns that conserve biodiversity. Avoiding development and land use patterns which may cause environmental or public health and safety concerns.

Proposed Changes	Potential City Impacts	Comments to Province
<p>PPS 2024 also removes considerations for: “avoiding development and land use patterns which may cause environmental or public health and safety concerns” and “promoting development patterns that conserve biodiversity.”</p>		
<p>Housing PPS 2024 maintains the requirement for planning authorities to establish and implement minimum affordable housing targets. It also provides a definition of affordable housing.</p> <p>The definition of housing options is expanded to include laneway housing, garden suites, rooming houses, and low- and mid-rise apartments. It can also refer to a variety of housing arrangements and forms which has been expanded to include additional needs housing, multi-generational housing, student housing, culturally appropriate housing, supportive, community and transitional housing and housing related to educational uses.</p> <p>Planning authorities will need to coordinate with Service Managers to address the full range of housing options including housing affordability needs.</p> <p>Planning authorities will be required to permit and facilitate all forms of residential</p>	<ul style="list-style-type: none"> • The proposed policy seeks to implement minimum targets for the provision of housing that is affordable to low and moderate-income households which is consistent with the City’s approach. • The inclusion of range of housing options also aligns with the City’s housing strategy and implementation of Increasing Housing Choices in Neighbourhoods study. • The inclusion of the definition of affordable housing, and requirement to establish and work towards meeting affordable housing targets would help to secure affordable housing. The policy provides more clarity and transparency of Provincial direction to municipalities to plan for affordable housing. • The proposed policy to permit and facilitate residential development on commercial and institutional sites, has no corresponding reference for a continued mix of uses. These sites provide residents with access to services and amenities within their communities, and their loss would be contrary to the goal of building walkable, mixed-use communities. The policies are silent on the replacement of existing non-residential uses. The 	<ul style="list-style-type: none"> • The City generally supports introducing residential uses on underutilized commercial and institutional sites as part of a mix of uses where appropriate, but has concerns the proposed policy does not reference a mix of uses. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Policies should direct non-residential floor space on commercial sites be retained as part of any future redevelopment, wherever possible. • Policies permitting and facilitating residential development of underutilized commercial and institutional sites should include “<u>as part of a mix of uses</u> that supports the achievement of complete communities”. • Include minimum affordable housing period of 25 years for rental and up to perpetuity for ownership. • Define what is meant by “underutilized” in reference to institutional and commercial sites

Proposed Changes	Potential City Impacts	Comments to Province
<p>intensification that includes redevelopment of underutilized commercial and institutional buildings for residential uses.</p>	<p>City has policies requiring the replacement of existing commercial gross floor area (GFA) when redevelopment of commercial sites occurs.</p>	<p>and "equitable housing" (e.g. equitable access to affordable housing? If so, how?).</p>
<p>Settlement Areas and Settlement Area Boundary Expansions Planning authorities will no longer be required to achieve a minimum density target for development in new greenfield developments. Large and fast growing municipalities (a defined term) will only be encouraged to plan for a minimum target of 50 people plus jobs per hectare (PPJ/ha). No intensification target has been included.</p> <p>When making a decision on settlement boundary expansions, planning authorities will consider a list of criteria that includes: the need for additional land, infrastructure and public service facility capacity, impacts on specialty crop areas and prime agricultural areas, and the phased progression of urban development.</p> <p>Planning authorities should establish and implement phasing policies, where appropriate, to ensure development is orderly and aligns with the timely provision of infrastructure and public service facilities.</p>	<ul style="list-style-type: none"> • The proposed changes would result in urban sprawl that increases servicing costs and may create fragmented development, while reducing the opportunity of creating complete communities. This could divert improvements away from already established built up areas (e.g. SGAs and MTSAs). Municipalities have limited resources for servicing and would need to optimize resources to be cost effective. • This may dilute intensification and growth focused in Strategic Growth Areas such as MTSAs. If growth is being redirected elsewhere, the achievability of minimum targets within MTSAs will be more challenging. This does not appear to be aligned with strategic investments in infrastructure (e.g. transit, servicing). 	<ul style="list-style-type: none"> • The proposed removal of minimum density requirements for greenfield development may result in fewer homes being built. The development industry has demonstrated that they can build new greenfield communities in excess of current mandated minimums in the Growth Plan. • Allowing residential growth in areas not planned for would affect a municipality's ability to optimize resources including unplanned social and physical infrastructure upgrades. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Carry forward settlement boundary expansion criteria in the Growth Plan (i.e. section 2.2.8). • Retain policies requiring municipalities to create intensification strategies, focusing growth and intensification in SGAs, establishing minimum intensification targets, and requiring new development to occur adjacent to existing built up areas. • Retain requirement for a minimum greenfield density target to facilitate the achievement of complete communities; while avoiding the

Proposed Changes	Potential City Impacts	Comments to Province
<p>Municipal Comprehensive Review (MCR) The Growth Plan requirement for MCRs of official plans has not been carried forward for settlement boundary expansions and employment area conversions.</p> <p>There is no limitation on the ability of landowners to request a settlement boundary expansion and employment conversion. With proposed Bill 185 changes to the Planning Act, landowners will now be able to appeal a refusal of a settlement boundary expansion request.</p>	<ul style="list-style-type: none"> • Currently, settlement area expansions and the removal of lands from employment areas can only occur through an MCR process based on criteria within the Growth Plan. These occur every 5 to 10 years. • The proposed changes would allow requests for lands to be converted at anytime through the development application process. Given the scope of analysis typically required, a mandated timeline of 120 days for official plans amendments may not facilitate the best planning advice. Council and staff will need to be prepared to deal with conversion requests on an ongoing basis without the benefit of understanding cumulative impacts. • The proposed approach to the expansion of settlement areas may jeopardize planned growth within existing urban areas. Un-coordinated urban expansions at lower densities would not maximize the use of existing and planned infrastructure, would make it difficult to create complete communities, and may have more negative impacts on the natural environment, agricultural lands and resources. • Converting employment land can lead to land value escalation making it more difficult for businesses to locate and expand in the city. 	<p>need to develop on natural areas and prime agricultural land.</p> <ul style="list-style-type: none"> • Eliminating the requirements of an MCR may have negative impacts on how municipalities plan for infrastructure, job creation and for employment lands protections. <p>Request to the Province:</p> <ul style="list-style-type: none"> • The Province is urged to maintain a comprehensive review process for evaluating settlement area expansions and the removal of lands from employment areas. The Municipal Comprehensive Review (MCR) process allows conversion and settlement expansion requests to be assessed in totality with reference to growth forecasts, changes in land supply, trends in employment space and market conditions. • The Province should maintain the existing approach that conversions only be considered through a comprehensive approach that occurs at least every 5 years, while allowing municipally-initiated amendments at any time.

Proposed Changes	Potential City Impacts	Comments to Province
<p>Employment Currently, requests to remove lands from employment areas can only be made through the Municipal Comprehensive Review process that occurs every 5 to 10 years. The proposed changes would not require a Municipal Comprehensive Review and instead, allow for private amendment requests at any time to remove lands from employment areas. Provincially significant employment zones have not been carried forward in the draft PPS 2024.</p> <p>Planning authorities will be prohibited from allowing retail and office uses in employment areas unless they are associated with the primary employment use (e.g. manufacturing). This is in line with recent updates to the Planning Act definition of Employment Areas that were passed in 2023 (but not yet in force).</p> <p>Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. Planning authorities shall also maintain land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.</p>	<ul style="list-style-type: none"> • Employment areas provide land for diverse employment uses (i.e. industrial, office, retail) to meet current and future needs, and residential development is currently not permitted. Staff and landowner-initiated requests for conversion occur when the Region’s Official Plan is updated typically every 5-10 years (Municipal Comprehensive review or MCR). The conversion requests can be assessed in totality with reference to growth forecasts, changes in land supply, trends in employment space and market conditions. In Mississauga’s case, there is enough residential land already available to more than double the number of housing units in the city, well above provincial targets. • The proposed changes to employment policies generally move towards reviews conducted on site-by-site basis. This will almost certainly lead to land speculation making it more expensive and complex (e.g. land-use compatibility concerns) for potential businesses to locate or expand in these areas. • While there are some strategic opportunities for conversions, the process should be rigorous and comprehensive. Many areas where non-residential uses are present do not have proper servicing (schools, parks etc.) for residential development and are generally unsuitable locations compared to existing vacant or underutilized mixed-use sites. While increasing housing supply is vital, it does not have to occur at the expense of future economic growth. 	<ul style="list-style-type: none"> • The Province’s proposed modifications to how municipalities plan for employment may have long-term, unintended consequences. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Maintain the MCR process for the removal of lands from employment areas. The MCR allows for a holistic approach to employment planning, and helps avoid unintended consequences to industry, and commercial development. • Allow small-scale office and retail services that complement and strengthen the function of the employment areas and provide services and amenities to the employees in those areas (e.g., essential office and retail uses such as restaurants, pharmacies, medical offices, etc.). They should also allow for commercial uses where other PPS policies do not permit sensitive land uses (e.g. adjacent to the Airport), or where they provide a transition to nearby residential communities. • Policies should recognize commercial uses may continue to be permitted where they are lawfully established as per Bill 97. • Conduct more in-depth analysis and consultation with industry leaders before approving changes to employment policies.

Proposed Changes	Potential City Impacts	Comments to Province
<p>PPS 2024 does not carry forward language requiring separation or mitigation of sensitive land uses from heavier employment uses in employment areas.</p> <p>Planning authorities would be permitted to remove lands from an employment area subject to demonstrating several tests. The tests are as follows:</p> <ul style="list-style-type: none"> a) there is an identified need for the removal and the land is not required for employment area uses; b) the proposed uses would not negatively impact the overall viability of the employment area by: <ul style="list-style-type: none"> 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts; 2. maintaining access to major goods movement corridors; c) existing or planned infrastructure and public service facilities are available; and d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the official plan. 	<ul style="list-style-type: none"> • Through Bill 97, the Province changed how employment areas are defined by removing commercial uses such as office and retail, while allowing municipalities to bring forward policies permitting these uses where they are lawfully established. The proposed policies do not recognize that existing commercial uses (i.e. lawfully established) are permitted to continue. • The employment land definition is overly restrictive and does not account for how businesses rely on a mix of non-residential uses to continue to be attractive places for investment. Commercial uses in employment areas offer several benefits: <ul style="list-style-type: none"> ○ provide access to services and amenities that support the wider employment area – e.g. restaurants, print shops, banks, courier services, etc; ○ allow for a transition along the edges of employment areas between major facilities and nearby residential communities; ○ make sites more attractive to companies and their employees and assist in employee attraction and retention; and ○ accommodate office uses that are often along transit corridors and contribute towards transit ridership. • Redeveloping commercial lands in employment areas with sensitive land uses could have negative implications for industry. Commercial lands are often 	<ul style="list-style-type: none"> • Clarify the Province’s intent for employment lands outside of employment areas. Request policies distinguish between primary and secondary uses for these lands. The City relies on employment lands as part of its economic development strategy, and it is important that the primary use continue to be protected for employment to ensure a balanced mix of jobs and residents. Having this distinction would still allow for PPS policies that require municipalities to permit a mix of secondary uses on those lands, including residential. • In order to support the creation of complete communities, the PPS should clarify that when redevelopment of existing commercial buildings occurs, commercial and office GFA should be replaced, wherever possible. The loss of these uses would reduce the range of amenities and services that residents enjoy in their community, and eliminate jobs near where they live.

Proposed Changes	Potential City Impacts	Comments to Province
	<p>located near the edges of employment areas in-between industry and nearby residential areas. They can also be located in the middle of an employment area where their removal may impact the overall integrity and viability of the remaining employment area. These lands provide access to small-scale retail that support the wider employment area – e.g. restaurants, print shops, medical office, banks, etc. Through our engagements with industry, they have expressed concerns that allowing sensitive land uses in close proximity may have cost and risk implications to their operations.</p> <ul style="list-style-type: none"> Existing office and retail and service commercial uses located in employment areas provide amenities and support employees within the area. Restricting office and commercial uses may impact a landowner’s ability to invest and attract new tenants in existing buildings. 	
<p>Strategic Growth Areas PPS 2024 brings forward several concepts from the Growth Plan including Strategic Growth Areas and Major Transit Station Areas (MTSAs). However, it removes the concept of Urban Growth Centres (UGC).</p> <p>Planning authorities will no longer be required to identify and focus growth in strategic growth areas. Instead, they will only be encouraged to identify and focus growth in such areas.</p>	<ul style="list-style-type: none"> The proposed policies that support redevelopment of commercially-designated retail lands to mixed-use residential are silent on the replacement of existing non-residential uses. The City currently has policies requiring the replacement of existing commercial gross floor area (GFA) when redevelopment of commercial sites occurs to accommodate a range and mix of land uses. The removal of UGCs does not include a clear definition of downtowns which may impact the City’s ability to secure parkland in these areas based on 	<ul style="list-style-type: none"> Comments provided under Housing on the development and redevelopment of underutilized commercial sites are also applicable to this section. <p>Request to the Province:</p> <ul style="list-style-type: none"> Retain Provincially delineated UGCs which could be modified through a municipal comprehensive review. Provide a definition for “Downtowns” that recognizes they are created through an Official

Proposed Changes	Potential City Impacts	Comments to Province
<p>Planning authorities should prioritize planning and investment in infrastructure in strategic growth areas, identify the appropriate type and scale of development, permit development and intensification to support achievement of complete communities, consider a student housing strategy and support redevelopment of commercially-designated retail lands to support mixed-use residential development.</p> <p>PPS 2024 proposes to carry forward the MTSA framework from the Growth Plan including requirements for delineation of MTSA boundaries and minimum density targets. Planning authorities will be required to delineate MTSA boundaries on higher order transit corridors through new official plan policies adopted under section 26 of the Planning Act.</p> <p>Planning authorities will be encouraged to promote transit-supportive development within MTSA's by supporting the development of surface parking lots, including commuter parking lots.</p> <p>Additional policy language is proposed to encourage multi-modal access to stations and connections to nearby major trip generators, accommodate a range of</p>	<p>the existing Parks Plan and the Parkland Conveyance By-law.</p> <ul style="list-style-type: none"> • Changes to SGA policies and definitions may not align with the City Structure and the established urban hierarchy of densities as set out by the Official Plan. • Mississauga would also be required to plan for intensification on lands that are adjacent to existing and planned frequent transit corridors where appropriate. Frequent transit corridors are defined as “a public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week.” The implications of this proposed change is unclear. • The definition for SGAs now includes lands adjacent to publicly assisted post-secondary institutions. The addition this wording is a concern because it does not consider local context and these areas may not always be suitable for these uses. 	<p>Plan review and/or Provincially delineated UGC.</p> <ul style="list-style-type: none"> • Reconsider implications of policy 2.4.3 on frequent transit corridors: <ul style="list-style-type: none"> ○ This policy is too broad and may compete with a municipality’s ability to attract development in MTSA's and Downtowns. ○ Clarify that “where appropriate” provides flexibility for municipalities to determine which, if any, frequent rapid transit corridors should be included in a SGA. ○ Clarify what is meant by “adjacency” and “transit frequency” as it varies according to many factors such as: changes in the seasons, overall ridership, and transit networks. A frequent local bus route is not as fixed as a higher-order transit line and may not always support intensification. • Consider including policies on the following: <ul style="list-style-type: none"> ○ Focusing growth in SGAs (e.g. UGC, MTSA) where infrastructure investments (e.g., transit) would be optimized and where there are more opportunities to create complete communities. If growth is being redirected elsewhere, the achievability of minimum targets within SGAs, such as MTSA's, would be more challenging. ○ Identifying, planning for, and directing growth to urban growth centres. Most

Proposed Changes	Potential City Impacts	Comments to Province
<p>mobility needs and support active transportation.</p> <p>Planning authorities will now be required to plan for intensification on lands that are adjacent to existing and planned frequent transit corridors where appropriate.</p>		<p>large municipalities have already centered their growth and infrastructure planning priorities towards developing their urban growth centres into complete communities.</p> <ul style="list-style-type: none"> • Revise the definition of SGA to remove “lands adjacent to publicly assisted post-secondary institutions”. • Policies 2.4.2.6 and 2.4.2.7 appear to be duplicate policies and may need to be deleted. • Consider policies for shared parking between GO commuters and new/adjacent development within MTSAs.
<p>Infrastructure</p> <p><u>General</u></p> <p>Public service facilities should be planned and co-located with one another, along with parks and open space where appropriate. Planning authorities in consultation with school boards should consider and encourage innovative approaches in the design of schools and associated child care facilities (e.g. integrate schools in high-rise buildings).</p> <p><u>Transportation</u></p> <p>PPS 2024 deletes policy promoting a land use pattern, density and mix of uses that minimize the length and number of vehicle</p>	<ul style="list-style-type: none"> • The proposed policies may encourage more development for schools in mixed use buildings. • There are many parks in Mississauga that are located adjacent to schools, and Mississauga has shared-use agreements with school boards to provide for community access to facilities either partially or fully located on school board lands, where appropriate. • As parkland acquisition is opportunity driven, co-locating with public service facilities is not always possible or desired, and may result in limited access to a park by the public on certain times and days of the week. 	

Proposed Changes	Potential City Impacts	Comments to Province
<p>trips and support current and future use of transit and active transportation.</p> <p><u>Sewage and Water Services</u> Planning for sewage and water shall consider opportunities to re-allocate if necessary unused system capacity to meet current and projected needs for increased housing supply.</p>		
<p>Airports Stronger policy language is proposed from <u>discouraging</u> to <u>prohibiting</u> land uses which may cause a potential aviation safety hazard.</p>	<ul style="list-style-type: none"> • Toronto-Lester B. Pearson Airport (Airport) continues to serve a significant role for economic growth, creating business and employment opportunities, tourism, and in facilitating the movement of goods - regionally, nationally and internationally. • The City's Official Plan policies recognize that new construction can potentially impact the airport or airspace capacity and has policies to ensure that new construction is compatible with the requirements of the Airport. The proposed PPS 2024 change would require a minor amendment to the official plan. 	<ul style="list-style-type: none"> • The City supports the Province's proposal to have stronger policy language prohibiting land uses which may cause a potential aviation safety hazard.
<p>Land Use Compatibility Planning authorities would no longer need to demonstrate that there are no alternative locations for a proposed sensitive land use where encroachment may occur adjacent to planned industrial, manufacturing and other uses.</p> <p>Proposed adjacent sensitive land uses would only be required to demonstrate potential</p>	<ul style="list-style-type: none"> • The proposed changes to employment area and land use compatibility policies may make it easier to locate sensitive land uses in closer proximity to industrial uses. Reducing requirements for separation and transition may threaten the viability of industry in employment areas and lead to negative impacts on public health and safety. • By weakening these policies, sensitive land uses, including schools and new residential high rise 	<p>Request to the Province:</p> <ul style="list-style-type: none"> • The Province should re-emphasize avoidance as opposed to mitigation for development proposing sensitive land uses adjacent to major facilities. The proposed policies appear to place the burden on industry through regulatory approvals, which may frustrate their ability to continue to operate or expand.

Proposed Changes	Potential City Impacts	Comments to Province
<p>impacts to heavier employment uses are minimized and mitigated in accordance with provincial guidelines.</p>	<p>buildings, could more easily be built in proximity to industry. More burden would be placed on industrial operators to demonstrate compliance with Provincial guidelines related to minimizing and mitigating impacts to nearby sensitive land uses. This has risk and cost implications for industrial operators, particularly when expansions are proposed, and in some cases, businesses may find that their location is no longer viable.</p> <ul style="list-style-type: none"> • The proposed changes would weaken the ability of municipalities to ensure development does not result in land use compatibility issues and avoid adverse impacts to human health and safety. • Employment land conversion outside of a comprehensive process can significantly fragment these lands and impede industries' ability for future expansions and growth. It encourages encroachment of sensitive uses closer to industrial ones by eliminating commercial uses which tend to act as buffers. It also impacts the municipality's ability to optimally and wisely plan for infrastructure and social services for areas that were not intended to permit sensitive uses and does not allow for the planning of complete connected communities. • The policies emphasise minimizing and mitigating where avoidance is not possible for the introduction of sensitive land uses. This would make it easier to locate sensitive land uses (e.g. residential) in closer proximity to major facilities. As a result, industry may 	<ul style="list-style-type: none"> • The policies should also be strengthened to ensure an appropriate separation and transition between heavier employment uses and sensitive land uses is achieved. • Reinstate policies in section 1.2.6.2 of PPS 2020 on land use compatibility.

Proposed Changes	Potential City Impacts	Comments to Province
<p>Natural Heritage No significant changes to the natural heritage policies except to definitions. However, natural heritage system mapping and associated policies have not been carried forward from the Growth Plan. This may weaken protections for natural heritage features within the Greater Toronto and Hamilton Area.</p>	<p>be exposed to more nuisance-related complaints and face additional regulatory burdens. This may impede industries' ability to expand in the future.</p> <ul style="list-style-type: none"> • The mapping of natural heritage features would now become a municipal responsibility based on evaluation criteria that is to be established by the Province. • Generally, changes can be made more easily to municipal planning policy, and there is more recourse for challenge than is the case with policies and mapping contained in provincial planning documents. • Changes to the definition of <i>significant</i> (a & b) regarding <i>wetlands</i> and <i>woodlands</i> would not have a direct impact on the city. However, it is unclear if the province will release any new criteria and procedures to determine a significant woodland or significant wetland as per the revised definitions. • The City would be encouraged to undertake watershed planning with the appropriate conservation authority. Watershed planning is a complicated discipline which touches on many topics (e.g. natural heritage, water and sewage, stormwater management), and may require additional resources. 	<ul style="list-style-type: none"> • The City supports the retention of the Natural Heritage policies. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Clarify whether there are any additional/refined criteria and procedures being developed. • If the Province chooses to release criteria and procedures on significant wetlands and woodlands, the City welcomes collaboration on their development.
<p>Natural and Human-made Hazards Municipalities would be required to identify hazardous lands and hazardous sites and</p>	<ul style="list-style-type: none"> • The City's Official Plan and Zoning By-law already identifies the location of hazards throughout the City and has policies managing development in these areas. The exact limits of development are 	<ul style="list-style-type: none"> • The City supports the inclusion of policy requiring the identification of hazard lands and the management of development in these areas. The City will continue to coordinate

Proposed Changes	Potential City Impacts	Comments to Province
<p>management of development in these areas in accordance with provincial guidance.</p> <p>PPS 2024 would remove policy requiring planning authorities to support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.</p> <p>PPS 2024 also amends policy 5.3.2 to provide that sites with contaminants in land or water shall be assessed and remediated prior to any activity on the site associated with a proposed use so that there will be no adverse effect.</p>	<p>determined during the development application process and in consultation with the appropriate conservation authority.</p> <ul style="list-style-type: none"> The On-Site and Excess Soil Regulation O. Reg. 406/19, made under the <i>Environmental Protection Act</i> would make it more restrictive to dispose of excess soil at waste management facilities by 2025. This would encourage all industries to look for ways to reuse excess soil either on-site or at other off-site properties that could beneficially re-use that soil for their own projects. Therefore, it is no longer necessary to have this wording in the PPS, which acts more as a guideline rather than an enforceable provision. 	<p>with conservation authorities when evaluating development applications to assess the limits of development near hazard lands.</p> <ul style="list-style-type: none"> The City has no concerns with the removal of policy language regarding on-site and local re-use of excess soil.
<p>Cultural Heritage and Archaeology “Significant” terminology has been deleted from “built heritage resources” and from “cultural heritage landscapes”. New term introduced: “Protected heritage property”.</p> <p>Planning authorities are encouraged to develop and implement archaeological management plans and proactive strategies for identifying properties for evaluation under the <i>Ontario Heritage Act</i>.</p> <p>PPS 2024 carries forward the PPS 2020 requirements for early engagement with Indigenous communities and ensuring their interests are considered when identifying,</p>	<ul style="list-style-type: none"> Proposed changes would have a limited effect on the City. The City is presently in the process of implementing an archaeological management plan. 	<p>Request to the Province:</p> <ul style="list-style-type: none"> Clarify the meaning of “proactive strategies” in regard to identifying properties for evaluation under the <i>Ontario Heritage Act</i>. Will there be an opportunity to discuss examples? Additionally, would this language apply only to archeology or to all historic properties? Clarify engagement requirements with Indigenous communities. What is meant by “ensuring interests are considered” and what is the expectation of municipal staff? Policies on engagement with Indigenous communities should be clarified to facilitate

Proposed Changes	Potential City Impacts	Comments to Province
<p>protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.</p>		<p>more substantive municipal-Indigenous relationships.</p>
<p>Implementation and Interpretation Municipalities will be required to keep zoning by-laws up to date with their Official Plans and the PPS by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.</p> <p>Where a planning authority must decide on a planning matter before their official plan has been updated to be consistent with the PPS, or before other applicable planning instruments have been updated accordingly, it must still make a decision that is consistent with the PPS.</p> <p>Policy removed that official plans are the most important vehicle for implementation of PPS policies (still retained in Preamble).</p> <p>PPS 2024 carries forward language from the Growth Plan that density targets represent minimum standards and planning authorities are encouraged to go beyond these targets where appropriate, except with doing so would conflict with other provincial policy.</p>	<ul style="list-style-type: none"> • Bill 185 removes the Region’s planning authority on July 1, 2024. Based on this date the Province would be the approval authority of the City’s new Official Plan. • Implementation provisions require that all planning decisions (even for applications submitted under the previous regime) be consistent with the PPS, 2024, (once it is adopted) even if the Official Plan has not been updated. Staff are in the process of updating the City’s Official Plan to bring it into consistency/conformity with Provincial plans and policies. A new PPS may delay this process, and cause uncertainty in the review of development applications in the interim. 	<ul style="list-style-type: none"> • Each Official Plan conformity exercise requires a significant amount of resources for staff to conduct research, policy development and engage with Council, Indigenous communities, community, and stakeholders. The City is at the final stage of completing its 10-year Official Plan Review. Having to review the City’s Official Plan again and in a short time frame to be consistent with a new PPS would require additional time and resources. In addition, the period in-between conformity could create more uncertainty for development and could impact the success of several City planning initiatives. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Policies should include a transition extending the timeline for the completion of official plan reviews to address changes to be consistent with the proposed PPS. • Restore the policy that the official plan is the most important vehicle for implementation of this PPS and that comprehensive, integrated and long-term planning is best achieved through official plans.
<p>Coordination Planning authorities shall collaborate with publicly assisted post-secondary institutions</p>	<ul style="list-style-type: none"> • The City has developed and implemented a comprehensive engagement framework, and has a long history of having early, meaningful and 	<ul style="list-style-type: none"> • Mississauga welcomes the opportunity to coordinate on student housing matters with post-secondary institutions. This is reflected in

Proposed Changes	Potential City Impacts	Comments to Province
<p>to facilitate student housing that considers the full range of housing options nearby to meet current and future needs. Planning authorities shall collaborate with these institutions in the development of a student housing strategy that includes consideration of off-campus housing targeted to students.</p> <p>PPS 2024 proposes to strengthen policy language with an explicit requirement for “early” engagement with indigenous communities and to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision making and support identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. PPS 2020 only requires engagement and coordination. The Growth Plan includes language on facilitating knowledge sharing.</p>	<p>continuous communications with Indigenous communities, Service Managers, school boards, and stakeholders. However, it is difficult to negotiate with developers to secure spaces for schools through development.</p> <ul style="list-style-type: none"> • The City collaborates with Indigenous communities to determine what constitutes significant engagement for them. The City has early and frequent communications and meetings with Indigenous communities, and organizations to discuss matters of mutual interest and City initiatives and projects, such as the Official Plan Review. • Through several initiatives and studies, including the Official Plan Review, the City is making continuous efforts to engage with the public, stakeholders and equity-deserving groups. Staff would continue to have an open and transparent approach to engagement in planning matters, including the implementation of the PPS. 	<p>our housing supply pledge – <i>Growing Mississauga</i>. In addition, the City is supportive of the local HomeShare program. However, our experience to-date has been that post-secondary institutions prefer to rely on the secondary rental market to satisfy demand.</p> <p>Request to the Province:</p> <ul style="list-style-type: none"> • Clarify what is requested for engagement with Indigenous communities. What is meant by "ensuring interests are considered" and what is the expectation of municipal staff? • Policies for collaboration with school boards should also involve development industry.