

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Overall Comments

The comments provided in this submission are in addition to the submission and recommendations the City provided on the first draft of the Provincial Planning Statement which the City has submitted to the Province through previous ERO postings.

The updated Provincial Planning Statement, 2024 responds to some of the concerns raised by the City of Hamilton, including restoring protections of rural and agricultural areas from residential lot creation. However, on the whole, the City maintains the following concerns.

The revised Provincial Planning Statement, 2024 would still remove the requirement for a Municipal Comprehensive Review before a municipality can expand its urban boundary more than 40 hectares or convert employment lands to other uses. A significant new concern is that the removal of this requirement, combined with changes in Bill 185 that would allow landowners to appeal urban boundary expansion applications to the Ontario Land Tribunal, would mean that all whitebelt lands within the City (approximately 4,320 hectares total) could become subject to urban boundary expansion applications and appeals.

This significantly erodes the City's ability to make land use decisions based on the Urban Hamilton Official Plan's no urban boundary expansion growth strategy, public engagement, local conditions and municipal priorities and creates uncertainty in terms of the design and delivery of both "hard" infrastructure and community services required for complete communities. On top of this, there would also be immense legal expenses associated with any appeal.

The Province has stated through Environmental Registry of Ontario posting No. 019-8462 that to allow municipalities to understand and adapt to the policy changes in the proposed Provincial Planning Statement, 2024, they would provide a short window between the policies are finalized to when they come into force. The City recommends a minimum of six months to allow municipalities to undertake in-depth analysis of the implications of the proposed Provincial Planning Statement, including undertaking any updates to its Official Plan necessary to reflect the new provincial policy regime together with the various legislative changes proposed through Bill 185.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 1: Introduction	
<p>2023: See Appendix “D” attached to Report PED23145.</p> <p>2024: No revisions.</p>	<p>The updated proposed Provincial Policy Statement, 2024 does not add back section 1.7 or any policies respecting long-term economic prosperity with the exception of policy 2.8.2.3 e). The City of Hamilton reiterates the previous comments on the 2023 version that there needs to be a stronger policy connection to tie good planning and economic prosperity.</p> <p>It is understood the proposed Provincial Planning Statement will have the effect of repealing the Growth Plan although it is no longer explicitly stated in the updated proposed Provincial Policy Statement, 2024. The Province has advised that they will be making administrative amendments to the Greenbelt Plan so that the policies in the current Greenbelt Plan are maintained should the Provincial Policy Statement, 2020 and Growth Plan be revoked.</p> <p>This City of Hamilton reiterates the previous comments respecting the proposed vision. The vision needs to identify the value of the natural environment and the importance of sustainability for long range planning.</p> <p>The City acknowledges reference to conservation authorities have been added to new policy 4.2.5 regarding watershed planning and policy 5.2.1 for the identification of hazardous lands and hazardous sites. However, the role of conservation authorities in planning matters needs to be further clarified and strengthened in the policies to reflect the statement in the vision that the province, planning authorities and conservation authorities need to work together.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 1: Introduction (Continued)	
	The City reiterates previous comments respecting the removal of reference to the importance of cultural heritage in the overall vision provided in the 2023 version.
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.1 Planning for People and Homes	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Addition of new policies 2.1.1 and 2.1.2 replaces proposed policy 2.1.1 and clarifies that growth forecasts will need to be based on Ministry of Finance 25 year projections, however it still leaves in flexibility for modifying the projections.</p> <p>New 2.1.2 clarifies that previously released growth forecasts, like the current Schedule 3 Growth Plan forecasts, may continue to be used by municipalities for land use planning purposes.</p> <p>New policy 2.1.3 clarifies that land supply needs shall be considered in the writing of a new official plan as well as at the time of plan update, and provides a range of a planning horizon of minimum 20 years, and not greater than 30 years.</p>	<p>Ministry of Finance Projections</p> <p>The growth policies of the City’s Urban Hamilton Official Plan are based on the Growth Plan’s population forecast of 820,000 people and employment forecast of 360,000 jobs by the year 2051. The first draft of the Provincial Planning Statement did not include specific population and employment projections for municipalities, leaving it up to municipalities to establish their own projections. The revised Provincial Planning Statement, 2024 states municipalities must base population and employment growth projections on Ministry of Finance 25-year projections (2.1.1) but also states:</p> <ul style="list-style-type: none"> - Municipalities “may modify projections, as appropriate” and, - Municipalities may continue to use previous forecasts issued by the Province until its next Official Plan review.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.1 Planning for People and Homes (Continued)	
	<p>Overall, this new policy creates uncertainty on what growth projections are to be used as well as when and how municipalities would seek to modify Ministry of Finance population projections. The City notes that the Province has stated in their Environmental Registry of Ontario posting that municipalities can continue to use Growth Plan forecasts until more current forecasts are available to 2051; however, once the Provincial Planning Statement, 2024 comes into effect the City expects the Ministry of Finance projections would be referenced in applications for urban boundary expansions.</p> <p>The Ministry of Finance projections take no account of planning or Growth Plan policy, infrastructure capacity, housing affordability, land supply or other matters that influence the pattern of growth in southern Ontario. The results also tend to vary from year to year, given that the method is based in large measure on a continuation of recent patterns of migration and population growth rather than a forecast of longer-term trends.</p> <p>For these reasons, it is not clear that the Ministry of Finance projections would be any more or less helpful for land use planning than the current Growth Plan Schedule 3 figures.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.1 Planning for People and Homes (Continued)	
	<p>Given the number of unanswered questions surrounding the utility of the Ministry of Finance projections as well as when and how municipalities would seek to modify these projections, the City supports the continued use of Growth Plan schedule 3 projections which appear to be better suited to reflect land use planning conditions at the municipal level.</p> <p>Change in Planning Horizon</p> <p>Policy 2.1.3 has direct implications for land needs and may also impact the consideration of urban boundary expansion applications. The Policy states that at the time of the next official plan update, sufficient land must be made available to meet projected needs for 20 to 30 years. This directive makes it clear that municipalities are not required to immediately reassess land needs and that current growth projections and policies about accommodating growth in the Official Plan continue to be valid until the next Official Plan update. The City is supportive of this direction.</p> <p>Minister Zoning Order's</p> <p>The proposal does not revise the policy language added to (now) policy 2.1.3 which states development resulting from a Minister's Zoning Order (MZO) is in addition to the projected growth needs established in the Official Plan.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.1 Planning for People and Homes (Continued)	
	<p>The City reiterates the previous comments provided for the 2023 version of the proposed PPS which raised significant concerns for a municipality’s ability to plan for growth with efficient use of infrastructure and facilities and to achieve intensification targets.</p> <p>The updated proposed PPS has not clarified what factors are considered by the Province when issuing an MZO and the City reiterates the province should be required to comply with the criteria for supporting complete communities outlined in (now) policy 2.1.6 of the proposed PPS when considering issuing an MZO.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The 2024 version of the proposed PPS makes no revisions to proposed policy 2.1.4 to address the City’s previous comments which do not support the proposed changes to the criteria for the creation of complete communities. The City of Hamilton reiterates the comments submitted in 2023 respecting policy 2.1.4 (previously 1.1.1) which raised concerns with weakening policy direction respecting intensification, the ability to respond to a changing climate, the efficient use of public facilities and services, and undermining other provincial interests and public health and safety.</p> <p>These concepts should be added back into the policy since these are important in sustaining a healthy, livable and safe community.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.1 Planning for People and Homes (Continued)	
Other wording changes as outlined in PPS Comparison .	The 2024 version of the proposed PPS does not add back any reference to residential intensification in the proposed policies. The City of Hamilton reiterates the comments submitted in 2023 that this de-emphasizes the importance of intensification as an important way to accommodate growth in a sustainable manner.
2.2 Housing	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Adds the minimum targets for housing that is affordable to low and moderate income households back from original PPS 2020 text.</p> <p>Maintains the removal of reference to alignment of targets with local housing and homelessness plans.</p> <p>Maintains the addition of the term additional needs housing.</p> <p>Adds the term development to 2.2.1b) 2 with respect to residential development on commercial and institutional sites. Modifies the previous 2023 wording about development and redevelopment of these sites to reference cases where they are “underutilized”.</p> <p>Continues to remove specific direction to facilitate compact form to minimize the cost of housing and make efficient use of land.</p>	<p>The City was concerned with the removal of minimum targets for the provision of housing that is affordable to low and moderate income households as proposed in the 2023 version of the PPS. The City’s Urban Hamilton Official Plan currently includes policies related to targets for affordable housing.</p> <p>The City is generally supportive of adding these targets back given the challenges that many households face in acquiring affordable housing and having targets provides an important policy basis from which to build other housing policies and plans (i.e. Housing Strategy, Inclusionary Zoning). It is unclear however why the targets are no longer required to align with local housing and homelessness plans.</p> <p>The City previously submitted comments on the proposed definitions of low and moderate income households through its submission on ERO posting 019-7669 which raised concerns relative to the exemption of Development Charges based on the broad definition.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.2 Housing (Continued)	
	<p>The City is generally supportive of including direction to focus some development and redevelopment on underutilized commercial and institutional sites; however, the City requests some clarification about the process for determining underutilized lands. The City may need to update land use plans to reflect an appropriate vision for these properties.</p> <p>The 2024 version of the proposed PPS makes no revisions to add back the development standards for residential intensification, redevelopment and new residential development to minimize the cost of housing and facilitate compact built form previously included as policy 1.4.3 f) as identified in the City’s previous comments. The City of Hamilton reiterates the comments submitted in 2023 which do not support the removal of the criteria in policy 1.4.3 f) of the current PPS.</p> <p>The City reiterates the previous comment respecting clarity on how the requirement to coordinate land use planning and planning for housing with Service Managers will be operationalized.</p>
2.3 Settlement Areas and Settlement Area Boundary Expansions	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City reiterates the previous comments provided in 2023 respecting proposed policy (now) 2.3.1.1 particularly about the inclusion of “where applicable” which weakens the policy.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The updated proposed PPS, 2024 does not respond to the City’s previous comments provided in 2023 which raised concerns about the use of “should” vs “shall” when providing direction for land use patterns in settlement areas as well as concerns respecting the removal of reference to public health and sustainability considerations including the protection of natural features. Removal of preparing for the impacts of a changing climate from the determination of land use patterns may result in harm to the public through development in inappropriate locations. The City reiterates the comments provided on the 2023 version of the proposed PPS respecting this policy change which undermines matters of provincial interest in the <i>Planning Act</i>.</p>
<p>2023: See Appendix “D” to Report PED23145</p> <p>2024: Modifies policy 2.3.1.3 (renumbered from 2.3.3) to state that planning authorities ‘shall’ rather than ‘should’ support “general intensification and redevelopment to support the achievement of complete communities...”</p>	<p>The City supports the updated proposed PPS (2024) which changes the language to “shall” in the proposed policy 2.3.1.3 for supporting general intensification and redevelopment in the achievement of complete communities. However, as indicated in the City’s previous comments on the 2023 version, this policy needs to be strengthened with criteria to evaluate planning for complete communities through intensification.</p> <p>The City is supportive of changing the language back to “shall” when referring to the prescribed criteria for land use patterns within settlement areas to ensure the criteria must be met. The City was not supportive of the original proposed change to “should” in the 2023 version as outlined in the previous comments.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
	<p>The updated proposed PPS (2024) does not add back any language respecting sustainability when evaluating appropriate land use patterns in settlement areas. The City reiterates the previous comments on the 2023 version of the proposed PPS as the lack of policy direction respecting planning for the impacts of climate change throughout the policy document remain a significant concern.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Establishes new policies 2.3.1.4 to 2.3.1.6 which:</p> <ul style="list-style-type: none"> - Encourage planning authorities to establish and implement minimum targets for intensification based on local conditions; - Encourage planning authorities to establish minimum density targets for designated growth areas based on local conditions; and, - States planning authorities should establish and implement phasing policies that align with infrastructure and public service facilities. 	<p>The proposed new policies 2.3.1.4, 2.3.1.5 and 2.3.1.6 do not add back the policy direction to ensure development standards adequately mitigate risks to public health and safety (1.1.3.4) or the promotion of compact built form and efficient use of land (1.1.3.6) by directing growth adjacent to built up areas. The City reiterates the previous comments provided in 2023 which state the City does not support the removal of this direction which are important elements to emphasize in the effective creation of complete communities.</p> <p>The addition of policy 2.3.1.4 to encourage municipal intensification targets is positive; however, the language is too permissive. Intensification targets are a key part of the City’s growth strategy, and the intensification target has a direct correlation with land needs. The City requests that this policy be amended to require that minimum targets shall be established.</p> <p>The City is generally supportive of adding back the policy direction for establishing density targets now within designated growth areas (current policy 1.1.3.5).</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
	<p>The new policy encourages municipalities to set a target of 50 residents and jobs per hectare for designated growth areas. The City’s current Official Plan requires a minimum density of 70 persons and jobs per hectare to ensure the efficient use of land. The proposed policy should instead reference a minimum target, to give municipalities flexibility to require a greater target density than 50 residents and jobs per hectare.</p> <p>The City notes that added policy language in the implementation section of the proposed PPS (Policy 6.1.12) clarifies that policies which represent density targets are minimums, and municipalities are encouraged to have higher targets. However, this should be directly stated in the policy for clarity.</p> <p>The addition of proposed policy 2.3.1.6 (1.1.3.7 in the current PPS) provides direction for implementing phasing policies to allow for an orderly progression of development. This is an improvement from the 2023 version; however, with the removal of policy 1.1.3.3, there is still no requirement for municipalities to plan for growth in locations that support transit and have sufficient existing and planned infrastructure and public service facilities.</p>
2023: See Appendix “D” to Report PED23145.	The revised proposed PPS (2024) maintains the deletion of policy 1.1.3.8 which states the process to consider a settlement area boundary expansion is at the time of a municipal comprehensive review and further revises the criteria to evaluate settlement area expansions.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
<p>2024: Under Policy 2.3.2, the updated proposed PPS makes a number of changes to what planning authorities are to consider when identifying new settlement areas or settlement area boundary expansions, including:</p> <ul style="list-style-type: none"> - That planning authorities “shall’ rather than ‘should’ consider the policies. - Adds a policy (2.3.2.1 a)) that planning authorities shall consider “the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses”. - Adds a policy (2.3.2.1. d)) that planning authorities need to avoid prime agricultural areas and where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands. - Adds a new policy (2.3.2.2) that notwithstanding policy 2.3.2.1 b) planning authorities may only identify a new settlement area where it is demonstrated infrastructure and public service facilities are planned or available. 	<p>The proposed Provincial Planning Statement, 2024 still proposes to rescind the Growth Plan requirement for municipalities to undertake a Municipal Comprehensive Review before considering urban boundary expansions and employment land conversions. This would allow proponents to submit Official Plan Amendment applications for urban boundary expansions and employment conversions at any time and with no limit on the size of a boundary expansion request, whereas the Growth Plan currently limits landowner applications to 40 hectares.</p> <p>In conjunction with the proposed changes to appeal rights for Urban Boundary Expansion applications through Bill 185, these policies are, in essence, a reversal of the Province’s previous decision through Bill 150 to re-establish the Council-approved No Urban Boundary Expansion growth strategy, which was based on a firm urban boundary.</p> <p>The proposed Provincial Planning Statement, 2024 states municipalities shall consider certain criteria for expanding a settlement area including whether there is a need for additional land to accommodate an appropriate range and mix of land uses, if there is sufficient infrastructure capacity available or planned and general avoidance of expansions into prime agricultural areas. The City’s previous comments opposed the removal of the Municipal Comprehensive Review requirement, stating that it would limit the ability of municipalities to effectively plan for orderly and comprehensive land use planning over time.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
	<p>To ensure orderly and well-planned development of complete communities, settlement area boundary changes should only be considered as part of a comprehensive municipally led official plan update process. The City requests that the settlement area boundary expansion policies be amended to include this stipulation.</p> <p>There are significant land use planning and financial implications of allowing applicants to appeal urban boundary expansion applications to the Ontario Land Tribunal.</p> <p>Transferring authority to the Ontario Land Tribunal from municipalities and the Province to consider and approve urban boundary expansion requests will significantly increase uncertainty of where growth is planned to occur, severely impacting the ability of communities to effectively and efficiently plan for growth including both hard infrastructure and public services in a comprehensive and coordinated manor, such as through Secondary Planning and Subwatershed Planning. The change will also impact the ability to prepare accurate City-wide Master Servicing Plans and Development Charge Studies, as there would be less certainty regarding when and where growth will occur, subject to the outcomes of individual private applications.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
	<p>In addition, by allowing the Ontario Land Tribunal to adjudicate multiple individual urban boundary expansion application appeals, there is little to no certainty on the timing and outcome of Ontario Land Tribunal decisions, which can lead to a fragmented urban boundary.</p> <p>The continuous pressure of urban boundary expansion applications and appeals would also redirect city staff resources from focusing on completing the necessary growth and infrastructure planning that is essential to achieving the City’s intensification targets to processing development applications for new housing that on sites that are already within the urban boundary and serviced.</p> <p>The Province’s proposal to allow landowners to opt out of a Formal Consultation process in Bill 185 would further exacerbate this by potentially allowing incomplete urban boundary expansion applications to be submitted. As a result, staff have noted there are staffing implications associated with both the Bill 185 and the proposed Provincial Planning Statement, 2024.</p> <p>While the language in the proposed policy has been revised to replace the terms “new settlement areas” or “settlement area expansions” to “designated growth areas” from the 2023 version of the proposed PPS, the effect of the policy remains the same of providing added flexibility for permitting new settlement areas and settlement area expansions.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.3 Settlement Areas and Settlement Area Boundary Expansions (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: This policy is moved to 2.3.1.5 and further revised to replace “new settlement areas or settlement area expansion” to “designated growth areas”. No changes are made to the wording of the policy itself.</p> <p>Designated Growth Areas is a newly defined term in the PPS which means “lands within settlement areas designated for growth or lands added to settlement areas that have not yet been fully developed. Designated growth areas include lands which are designated and available for residential growth in accordance with policy 2.1.4.a), as well as lands required for employment and other uses.”</p>	<p>The City reiterates the previous comments submitted in 2023 which identify significant concern for this added flexibility and the recommendation to “require” instead of “encourage” minimum density targets in these areas to better support policy direction for intensification.</p>
2.4 Strategic Growth Areas	
<p>2024: Adds new policy 2.4.1.1 which states:</p> <p>Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.</p>	<p>The City of Hamilton supports directing growth within strategic growth areas which would now consist of the MTSAs (which are currently under review to be delineated), existing and emerging downtowns, lands adjacent to publicly assisted post-secondary institutions and other areas to focus development.</p> <p>However, there is concern the language of this policy should be stronger to better promote residential intensification and achieving minimum growth targets.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.4 Strategic Growth Areas (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Renumbered to 2.4.1.2.</p> <p>Removes reference to large and fast growing municipalities and adds new indicators for planning strategic growth areas including which is now a should not a shall:</p> <ul style="list-style-type: none"> a) To accommodate significant population and employment growth; b) As focal areas for education, commercial, recreational and cultural uses; c) To accommodate and support transit networks and provide connection points for inter-and intra-regional transit; and, d) To support affordable, accessible and equitable housing. 	<p>The City reiterates its previous comments respecting policy 2.4.1.1 however it is unclear why the policy was weakened so the criteria is no longer a requirement. This reflects the policy direction away from supporting the encouragement of residential intensification.</p>
<p>2024: Adds new policy (2.4.1.3) that directs planning authorities to prioritize planning and investment for infrastructure and public service facilities in strategic growth areas, identify the appropriate type and scale of development in strategic growth areas, permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form, consider a student housing strategy when planning for strategic growth areas and support redevelopment of commercially-designated retail lands to support mixed use residential.</p>	<p>The City is supportive of the general direction in proposed policy 2.4.1.3, which supports intensification, redevelopment of underutilized land, the efficient use of infrastructure and public service facilities, and consideration for student housing which was absent in the 2023 version of the proposed PPS.</p> <p>It is unclear why the criteria included in this policy are only encouraged through the use of “should”. The City recommends strengthening this policy by replacing “should” with “shall”.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.4 Strategic Growth Areas (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Removes proposed new policy from 2023 respecting reductions to the size or change in locations of an urban growth centre.</p>	<p>The City of Hamilton maintains the previous comment indicating support of maintaining existing urban growth centres. This previously proposed policy has been removed as the 2024 version of the PPS removes urban growth centres altogether and refers to them as existing and emerging downtowns. Existing and emerging downtowns has not been defined in the proposed PPS and may cause ambiguity in the interpretation.</p> <p>Urban growth centres have minimum density targets established in the Growth Plan which will therefore be removed. The City has concerns that the removal of urban growth centres will negatively impact the promotion of residential intensification.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Removes reference to large and fast growing municipalities and adds the word “approximately” when referencing the radius for an MTSA.</p>	<p>The use of the wording “approximately” is consistent with the current definition of a Major Transit Station Area in the current Growth Plan and proposed PPS.</p> <p>The City’s MTSA workplan has used an approximate radius for the 500-800m draft delineations around the LRT stops and GO Transit rail locations. This has allowed flexibility in the delineations to capture lands that may fall slightly beyond the 800m catchment, but which are suitable for inclusion in the MTSA due to their potential for redevelopment and intensification.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.4 Strategic Growth Areas (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Removes reference to large and fast growing municipalities and replaces with planning authorities.</p> <p>Removes the word “inter-city” when referencing commuter and regional rail.</p>	<p>These minor amendments to the proposed policy are supported. No implications for policy interpretation.</p>
<p>2024: Adds new policy 2.4.2.3 which directs municipalities to promote development and intensification within MTSAs by:</p> <p>“a) planning for land uses and built form that supports the achievement of minimum density targets; and</p> <p>b) supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit supportive and promote complete communities.”</p>	<p>This series of policies seem generally supportable. Planning for land uses and built forms that support achieving minimum density targets in MTSAs is already being considered through the existing MTSA workplan.</p> <p>Regarding encouragement of redevelopment of surface parking lots, this is consistent with general feedback that Policy Planning staff heard through the public engagement process for GRIDS 2 and the MCR regarding intensification targets. There was a strong desire to see redevelopment of surface parking lots for intensification and housing in the urban boundary.</p> <p>While this policy is supportable in terms of intent, integration of commuter parking facilities into redevelopments for those wishing to access higher order transit as part of a multi-modal commute should be considered in the policy wording.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.4 Strategic Growth Areas (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Renumbered to Policy 2.4.2.4 and removes reference to large and fast growing municipalities and replaces with planning authorities.</p>	<p>The City of Hamilton maintains the comments previously provided in 2023 which indicated support for allowing flexibility in the required density targets within MTSAs where growth cannot be accommodated due to other considerations but recommended the minimum density target should not be subject to privately initiated official plan amendments.</p> <p>The City of Hamilton is not impacted by the replacement of “large and fast growing municipalities” with “planning authorities”.</p>
<p>2024: Removes Policy 2.4.2.4 (2023 version).</p>	<p>This policy refers to planning authorities that are not large and fast growing municipalities and therefore does not apply to the City of Hamilton.</p> <p>No comment.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City of Hamilton maintains the comments previously provided in 2023 in support of this added policy.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The updated proposed PPS, 2024 does not provide clarification as to why a Major Transit Station Area would not be transit supportive. City of Hamilton reiterates the comments previously provided in 2023.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.4 Strategic Growth Areas (Continued)	
<p>2024: Adds Policy 2.4.2.7 as follows:</p> <p>“All major transit station areas should be planned and designed to be transit-supportive and to achieve multimodal access to stations and connections to nearby major trip generators by providing, where feasible:</p> <ul style="list-style-type: none"> a) connections to local and regional transit services to support transit service integration; b) infrastructure that accommodates a range of mobility needs and supports active transportation, including sidewalks, bicycle lanes, and secure bicycle parking; and, c) commuter pick-up/drop-off areas.” 	<p>As written, Policy 2.4.2.7 appears to be an exact duplication of 2.4.2.6, which appears to be an error. If there is another policy that should have been added as 2.4.2.7 or 2.4.2.6 instead, the Province should provide clarification and additional time for review.</p>
<p>2024: Adds new policy section 2.4.3 “Frequent Transit Corridors” requiring planning authorities to plan intensification on lands adjacent to existing or planned frequent transit corridors (new term) which is 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.”</p>	<p>This revised policy needs to be reviewed in reference to the proposed service levels through the (Re)Envision the HSR project and the current Urban Structure identifications for “Corridors” on Schedule E of the Urban Hamilton Official Plan. The frequency of bus service and routing plans as part of (Re)Envision will have an impact on the interpretation of this policy and where intensification shall occur.</p> <p>The City notes that this is a “shall” policy however it is caveated with “where appropriate” at the end. Staff would like further direction from the province about the expected levels of intensification along these frequent transit corridors, and what may or may not be considered as an appropriate location for intensification.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.5 Rural Areas in Municipalities	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The 2024 PPS did not revise proposed policy 2.5.1 and therefore did not address the City’s previous comments provided in 2023. The City reiterates the previous comments.</p> <p>In policy 2.5.1 g, it has been stated “healthy, integrated and viable rural communities should be supported by conserving biodiversity and considering the ecological benefits provided by nature”. This should not just be restricted to the rural area. It is important to consider within both the urban and rural areas.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Reintroduces Policy 1.1.4.2 (now 2.5.2), reversing the 2023 PPS change that the City was not in support of.</p>	<p>The City of Hamilton was not supportive of the removal of policy 1.1.4.2 of PPS, 2020 as identified in the previously submitted comments. The City supports this policy being added back to ensure Rural Settlement Areas remain the residential and service centres serving the immediate community and surrounding rural area.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change, now numbered 2.5.3.</p>	<p>The City of Hamilton reiterates the comments previously provided in 2023 in support of the addition of “locally appropriate” to policy 2.5.3.</p>
<p>Other wording changes as outlined in PPS Comparison.</p>	<p>The 2024 version of the proposed PPS does not add back the preamble of Section 2.5 which provided background and context of the importance of preserving the social and environmental fabric of rural areas. The City of Hamilton reiterates the previous comments submitted in 2023 that the removal of the preamble does not adequately introduce the purpose and function of rural lands in Ontario.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.6 Rural Lands in Municipalities	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>In the current Provincial Policy Statement, the importance of protecting the natural environment and hazard lands in rural areas has been recognized.</p> <p>The City of Hamilton is not supportive of the proposed removal of policy 1.1.5.1 of PPS, 2020 as identified in the previous comments submitted in 2023. The City reiterates the previous comments as the 2024 version has not been revised to address these comments. While the conservation of biodiversity and consideration of ecological benefits has been identified in 1.1.4.1 h), this has not been translated into policy.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City of Hamilton maintains the comments previously provided in 2023.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>No comment.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City of Hamilton is not supportive of the proposed policy change as identified in the previous comments submitted in 2023. The City reiterates the previous comments.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 2.6.1c), (formerly 1.1.5.2 c)) is revised removing reference to “multi-lot residential development”.</p>	<p>The City of Hamilton maintains the previous comment that the City is not supportive of the removal of “locally appropriate” from policy 2.6.1 c) as it threatens the City’s ability to maintain its more restrictive lot creation policies to prevent further fragmentation of rural lands.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.7 Territory Without Municipal Organization	
Wording changes as outlined in PPS Comparison .	No comment.
2.8 Employment	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 2.8.1.1 d) now references the term “compatible” with respect to intensification of employment uses with compact mixed use development and adds reference to achievement of complete communities. This has been modified to remove reference to examples of employment uses that may be compatible in a mixed use setting (was previously referencing office, retail, industrial, manufacturing and warehousing).</p> <p>2.8.1.1e) added as a new policy to ensure transition areas are provided between employment areas and sensitive land uses.</p>	<p>The City reiterates its comment that there is value to having amenities/supports located in close proximity / integrated into significant employment areas. This needs to be done with care, but can be done in a manner that ensures the outcome is ‘supporting’ employment areas and advancing climate resilience through reducing automobile trips and encouraging pedestrian connections. The change in language to policy 2.8.1.1. d) does not have a significant impact on the policy interpretation.</p> <p>The inclusion of policy 2.8.1.1 e) helps address previous comments related to land use compatibility and helps ensure the long term viability for major facilities.</p>
2023: See Appendix “D” to Report PED23145.	The City identified some potential concerns as a result of the proposed new policy 2.8.1.2 in the previous comments provided in 2023. The City reiterates these comments.
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change from draft PPS 2023 version. Policy 2.8.1.3 is clarified that certain uses will be considered on lands that are considered “appropriate” transition between employment and sensitive land uses, and inserts reference to Policy 3.5 – Land Use Compatibility.</p>	The City reiterates the previous comments that the “lands for employment” that exists outside of an employment area will need to be carefully considered for local policy. However, the added clarification that only certain uses will be considered on lands which are considered “appropriate” transition between employment and sensitive land use is important.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.8 Employment (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Deletion of previous 2023 draft policy that stated that local OPs and Zoning By-laws could not contain provisions to be more restrictive than policy 2.8.1.3.</p>	<p>The City is supportive of removing the previously proposed policy 2.8.1.4.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Other than numbering change to 2.8.1.4 (due to deletion of policy above), no change to this proposed policy from 2023 version.</p>	<p>The City reiterates the previous comments provided in 2023 in support of this proposed policy.</p>
<p>2024: Policy 2.8.2.1 in previous 2023 version contained sub-policies a) and b) which have been revised to policies 2.8.2.1 and 2.8.2.2 respectively with subsequent policy numbering revised accordingly.</p> <p>“Planning authorities shall protect employment areas” has been added before policy 2.8.2.2.</p>	<p>The added language does not significantly change the interpretation of this policy. The City supports the direction within policies 2.8.2.1 and 2.8.2.2 to ensure the long term viability of major facilities and the centralization and efficiency of the movement of goods.</p>
<p>2024: Policy 2.8.2.3 (previously policy 2.8.2.2 in 2023 version) has been revised with respect to sub-policy d) which addresses prohibition of certain sensitive land uses that are not ancillary to employment. This has been updated and removes reference to “primary employment use” term and instead references “uses permitted in the employment area”, which appears to consider a broader range of uses in the area rather than a primary use on a site.</p>	<p>This language change appears to consider a broader range of uses than only the primary use on site thus allowing for more flexibility in permissions for sensitive land uses which are ancillary to uses permitted within employment areas.</p> <p>The addition of reference to “economic viability” better aligns policy 2.8.2.3 e) with policy 3.5.1 respecting land use compatibility.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.8 Employment (Continued)	
Policy 2.8.2.3 Sub-policy e) now references “economic viability” as a desired outcome in the planning for transitions between employment and sensitive land uses.	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 2.8.2.4 (previously policy 2.8.2.3 in 2023 version) maintains requirement for municipalities to review employment areas and update this designation where appropriate, in accordance with revised employment area definition. The policy now includes further language speaking to consideration of land use compatibility when undertaking assessment of the appropriateness of lands designated as “employment areas”.</p>	<p>The City continues to have concerns that the policy framework for employment areas would permit consideration of the removal of employment lands at any time. The updated proposed PPS does not clarify how often a municipality should be undertaking a review of the employment areas with the removal of the municipal comprehensive review process. If there are no longer requirements for municipal comprehensive reviews in the Policy Statement, the policy framework should provide direction that reviews be undertaken as part of an official plan update.</p> <p>The City is supportive of adding clarification to this policy that land use compatibility must be considered at the time of this review.</p>
2024: Policy 2.8.2.5 (previously policy 2.8.2.4 in 2023 version) has addition of sub-policy d) that references that when planning authorities decide to remove lands from an employment area, they need to demonstrate that there is sufficient local employment land to accommodate job growth to the end of the planning horizon in the OP. This speaks to a land supply consideration that was not mentioned in the earlier 2023 version.	<p>The City supports this addition of a land needs supply consideration for the removal of employment land. This is an important element in determining the appropriateness of removing employment land and ensures the protection of employment areas that have been identified as being needed to accommodate sufficient job growth within the planning horizon. The 2023 version of the proposed PPS did not require this to be demonstrated and would have threatened the maintenance of land for employment uses.</p> <p>An adequate supply of employment land contributes to the creation of more complete communities (live, work, play) which, in turn, is essential for building climate resilience/ lower carbon living.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	
2.9 Energy Conservation, Air Quality and Climate Change	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No Change.</p>	<p>The City of Hamilton has significant concerns with the proposed PPS weakening the policies related to climate change as described in the comments previously submitted in 2023. The City reiterates the previous comments which identify there should be much more robust policies related to climate change to ensure communities are being planned to promote low or no carbon living.</p> <p>In addition, within the vision it has been stated “a prosperous Ontario will support a strong and competitive economy, and a clean and health environment”. By not recognizing the importance of maintaining existing vegetation, it is unclear how the vision can be attained.</p> <p>It is recommended that current policy 1.8.1 f) and g) be included within policy 2.9.</p>
Chapter 3: Infrastructure and Facilities	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City reiterates the previous comments that are not supportive of the removal of reference to “prepares for the impacts of climate change” in the infrastructure and public service facilities policies as well as the removal of reference to “green infrastructure”.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 3: Infrastructure and Facilities	
3.2 Transportation Systems	
2024: Revised policy 3.2.1 to add reference to the use of zero- and low-emission vehicles.	The City of Hamilton is supportive of including reference to the use of zero and low emission vehicles in transportation systems. This is consistent with current direction within the City to plan for electric vehicles in new developments as well as the green building standards.
2024: Revises policy 3.2.3 to add words “planned for”.	The City of Hamilton has no concerns with adding the language “planned for” to policy 3.2.3 as it indicates connectivity within transportation systems is intended to be considered in the planning of complete communities and not only maintaining connectivity in the existing transportation systems.
2023: See Appendix “D” to Report PED23145. 2024: No change.	<p>The City of Hamilton maintains the previous comment that the City is not supportive of the removal of policy 1.6.7.4 of PPS, 2020 which is contrary to good planning with respect to the importance of transit, mode share, active travel, the climate emergency, air quality and energy conservation.</p> <p>The City still seeks clarification from the Province on the justification for removing this policy as there does not appear to be any defensible justification for removing this policy given that transportation is a major source of GHG emissions in every Ontario urban area and the current policy is not restrictive in cases where it cannot be achieved.</p>
	The City reiterates previous comments respecting policy 3.1.1, including the removal of reference to preparing for the impacts of a changing climate and the inclusion of “where appropriate” in policy 3.1.1 b).

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 3: Infrastructure and Facilities	
3.3 Transportation and Infrastructure Corridors	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Adds term adverse effects before “from the corridor and transportation facilities.”</p>	<p>The use of the term adverse impact when referring to impacts from the corridor and transportation facilities strengthens the policy relative to the protection of the natural environment, biodiversity, and public health and safety.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City of Hamilton maintains the previous comment that policy 1.6.8.6 of PPS, 2020 should be kept in the new PPS.</p>
3.4 Airports, Rail and Marine Facilities	
<p>Numbering changes only.</p>	<p>N/A</p>
<p>2024: Revises policy 3.4.2 c) to replace the word “discouraging” with “prohibiting” when referring to land uses which may cause a potential aviation safety hazard.</p>	<p>The proposed replacement of “discouraging” and “prohibiting” strengthens the policy relative to the protection of public safety and the protection of the airport operations.</p>
3.5 Land Use Compatibility	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The updated proposed PPS, 2024 does not add back the criteria for permitting a sensitive use adjacent to major facilities that there is an identified need for the proposed use or there are no alternative locations. The City reiterates the previous comments provided on the 2023 version that the City is not supportive of this amendment.</p> <p>Some of the revisions to the policies under Section 2.8 may reduce the impact of these changes however the concerns respecting restrictions on major facilities’ ability to expand or redevelop over the long term remain.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 3: Infrastructure and Facilities	
3.5 Land Use Compatibility (Continued)	
	<p>The Hamilton International Airport and Tradeport recently reaffirmed its support of the City’s position in adhering to the current measure of using the 28 Noise Exposure Forecast contours when considering residential development or other sensitive land uses in the area around the Airport. This considers that residential or other sensitive land use development within the 28 Noise Exposure Forecast contour could negatively impact the Airport’s ability to maintain and grow its position as a gateway hub for logistics, distribution and goods movement, such as limiting its key strategic advantage as a 24/7 unrestricted cargo airport.</p>
3.6 Sewage, Water and Stormwater	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Adds the word “timely” before manner in policy 3.6.1 (planning for sewage and water services to accommodate forecasted growth).</p> <p>Replaces the word “considers” with “aligns with” in policy 3.6.1 b) 4).</p> <p>Adds the following language to policy 3.6.1 d): “, including consideration of opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to meet current and projected needs for increased housing supply;”.</p>	<p>As was stated in the City’s comments to the Province on the first draft of the Provincial Planning Statement, 2023, the City does not support any policy changes that would encourage communal servicing systems (water and / or wastewater) due to the financial risk to the City in the event of a system failure and subsequent Ministry of Environment, Conservation and Parks orders for the City to assume the system.</p> <p>Additionally, the word “timely” added to policy 3.6.1 a) is too vague. If there is an expectation implied it should be included in the policy with more context.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 3: Infrastructure and Facilities	
3.6 Sewage, Water and Stormwater (Continued)	
<p>Adds policy 3.6.5 c) as follows: “c) within rural settlement areas where new development will be serviced by individual on-site water services in combination with municipal sewage services or private communal sewage services.”</p> <p>Revises policy 3.6.8 b) to include the words “or reduce” and “stormwater volumes and”.</p>	
3.7 Waste Management	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City of Hamilton reiterates the previous comment that policy 3.7.1 should maintain the language describing Integrated Waste Management (IWM) or define IWM in the definitions section and to expand the definition of waste management systems.</p> <p>Organics processing facilities are emerging as critical pieces of effective movement to net zero carbon. Hamilton’s Climate Action Strategy acknowledges this – and the need for the municipality to determine how to generate more ‘renewable natural gas’ (RNG) to fuel municipal vehicles, etc.</p>
3.8 Energy Supply	
Numbering changes only.	N/A
2024: Revises policy 3.8.1 to include energy storage systems.	The City of Hamilton does not have concern with this revision but requests that the province provide further guidance on siting requirements for energy storage systems.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 3: Infrastructure and Facilities	
3.9 Public Spaces, Recreation Parks, Trails and Open Space (Continued)	
Wording changes as outlined in PPS Comparison related to inclusive communities.	The City of Hamilton maintains support of the added language to support the needs of all ages and abilities as identified in the previous comments submitted in 2023.
Chapter 4: Wise Use and Management of Resources	
4.1 Natural Heritage	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policies remain the same as the 2023 version.</p> <p>Changes to defined terms related to natural heritage policies are included in summary of definition changes – see changes to the following terms:</p> <ul style="list-style-type: none"> - Fish habitat; - Natural heritage features and areas; and, - Negative impacts. 	<p>The 2024 version of the proposed PPS does not make any revisions to the existing natural heritage policies. The Natural Heritage System within the Province has been delineated based on a “systems” approach recognizing that features and their functions are important. This is based on the concept of Landscape Ecology and has been in place in the Province since 2005. A balance of growth and healthy environments are required. A healthy Natural Heritage System leads to a healthy population.</p> <p>The City of Hamilton maintains its previous comment that the proposed PPS provides the opportunity to strengthen the existing natural heritage policies in certain areas as described in the comments submitted in 2023.</p> <p>The changes to the defined terms are commented on below.</p>
4.2 Water	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	The City is not supportive of the proposed changes to policy 4.2.1 as described in the previous comments provided in 2023.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.2 Water (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The City is not supportive of the proposed changes to policy 4.2.2 which remove reference to sensitive surface water features, sensitive ground water features and their hydrologic functions as described in the previous comments provided in 2023.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Modifies policy 4.2.3 to state that large and fast-growing municipalities shall undertake watershed planning where the previous version encouraged municipalities to undertake watershed planning. Hamilton is a large and fast-growing municipality.</p>	<p>As was stated in the City’s previous comments, the City does not support any policy changes that would encourage communal servicing systems (water and / or wastewater) due to the financial risk to the City in the event of a system failure and subsequent Ministry of Environment, Conservation and Parks orders for the City to assume the system.</p> <p>The revision to this policy creates a two-tiered approach where it is only encouraged within some municipalities and required in others. This is not supported. A consistent approach should be taken, and this policy should be revised to require all municipalities to undertake watershed planning.</p> <p>The intent of the policy is supported, however, there is concern that the focus is only limited to water and water resources. The overall Natural Heritage System is to be considered (not just water). In addition, this policy specifically references municipalities. There is concern that recognition that this type of planning is complex, involves several disciplines, and can be multi-jurisdictional is missing. There are also questions regarding the timeframe associated with completing watershed planning.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.2 Water (Continued)	
<p>2024: Adds the following two additional policies stating:</p> <p>Upper-tier municipalities shall undertake watershed planning in partnership with lower tiers (4.2.4). “All municipalities undertaking watershed planning are encouraged to collaborate with applicable conservation authorities (4.2.5).</p>	<p>As was stated in the City’s comments, the City does not support any policy changes that would encourage communal servicing systems (water and / or wastewater) due to the financial risk to the City in the event of a system failure and subsequent Ministry of Environment, Conservation and Parks orders for the City to assume the system.</p> <p>Conservation Authorities, who have valuable knowledge of the larger system have not been specifically considered within this policy. Policy 4.2.5 “encourages” collaboration. It is suggested that the policy be revised to include stronger language (i.e., “shall”).</p>
4.3 Agriculture	
<p>2024: Policy 4.3.1.1 replaces “encourages” with “required” when referring to the use of an agricultural system approach.</p>	<p>In policy 4.3.1.1, it has been identified that an agricultural system approach is required. This is reflective of current policies within the Growth Plan. While it has been noted that guidance will be provided by the Province, it is unclear when this guidance will be available and if there is flexibility in the development of the system. In addition, it is unclear why the agricultural system developed for the Growth Plan is not being used.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 4.3.2.4 is modified replacing “may” with “shall” in regard to permitting a principal dwelling associated with an agricultural operation.</p>	<p>No comment.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.3 Agriculture (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 4.3.2.5 is modified to specify that the policy applies to lots in prime agricultural areas where a residential dwelling is permitted.</p> <p>Reference to additional residential units being subordinate to the principal dwelling has been removed.</p> <p>The word “may” is replaced with “shall” in regards to permitting two additional residential units and it is further specified that they need to be in accordance with provincial guidance.</p> <p>Policy 4.3.2.5 c) is modified to add “have” in front of “appropriate sewage and water services”. New policies d, e, and f are added requiring that any additional residential units:</p> <ul style="list-style-type: none"> - Address any public health and safety concerns; - Are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and, - Minimize land taken out of agricultural production. <p>The policy is modified removing “from the lot containing the principal dwelling” in reference to additional residential unit severance requirements.</p>	<p>The updated proposed PPS, 2024 makes two changes to the proposed policy 4.3.2.5 in the 2023 version that the City has concerns with. The revised policy removes reference to “subordinate to the principal dwelling”. The intent of the City’s new permissions for additional dwelling units in the rural areas is to ensure the additional dwelling unit is clearly secondary and subordinate to the principal dwelling. The removal of this phrase makes it difficult to interpret what would be considered a “limited scale” as per the revised policy 4.3.2.5 e). The City therefore reiterates the previous comment to revise the policy to include that municipalities shall establish appropriate policies and regulations to ensure that additional dwellings will be clearly subordinate to the principal dwelling as well as locational regulations.</p> <p>The City also requests clarification on how to evaluate the new policy d) for addressing health and safety concerns.</p> <p>The City also reiterates its previous comments recommending the policy be updated to limit to one additional dwelling.</p> <p>It is understood that the polices for Prime Agricultural Areas within the Protected Countryside designation of the Greenbelt Plan which only permit Additional Dwelling Units within single detached dwellings or existing accessory structures on the same lot, would take precedence over the proposed PPS.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.3 Agriculture (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 4.3.3.1 which contained criteria for residential lot creation within prime agricultural areas has been removed.</p>	<p>The City of Hamilton is supportive of the removal of policy 4.3.3.1 which contained criteria for residential lot creation in prime agricultural areas. Lot creation for residential purposes is not supported by the City of Hamilton as summarized in the previous comments submitted in 2023.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 4.3.3.2 has been deleted, removing the restriction that Official Plans and zoning by-laws cannot be more restrictive than policy 4.3.3.1 (now deleted).</p>	<p>The City supports this policy being deleted as it would limit municipality’s ability to establish “locally appropriate” official plan policies and regulations. The City strongly objected to the addition of this policy in the comments provided in 2023.</p>
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: Policy 4.3.3.1 (formerly 4.3.3.3) is modified to remove the words “non-residential”, thus changing the subject of the policy to lot creation in general.</p> <p>Policy 4.3.3.1 b) is modified to remove the words “while still ensuring.”</p> <p>Policy 4.3.3.1 c) is added to permit up to one residence surplus to agricultural operation per farm consolidation, provided that the new lot will be limited to a minimum size needed for appropriate sewage and water.</p>	<p>The updated proposed PPS, 2024 modifies policy 4.3.3.1 respecting lot creation in prime agricultural areas to reflect the existing policy in the current PPS (policy 2.3.4.1) with the only change being the inclusion of “up to one” when referring to residences surplus as a result of a farm consolidation and replaces the term “farming operation” with “agricultural operation”. The change in wording may expand the uses that are eligible for residential lot creation through a farm consolidation.</p> <p>The City supports permissions for lot creation in prime agricultural areas reverting back to ensure the protection of agricultural operations.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.3 Agriculture (Continued)	
The planning authority ensures that new dwellings and additional residential units are prohibited on any remnant parcel of farmland created by the severance.	
2024: Policy 4.3.3.3 is added stating: “the creation of new residential lots in prime agricultural areas shall not be permitted, except in accordance with policy 4.3.3.1.c).”	The updated proposed PPS, 2024 adds back policy 2.3.4.3 from the current PPS which does not permit the creation of new residential lots in prime agricultural areas except in accordance with the criteria discussed above. The City supports the policy being added back to maintain restrictive lot creation policies that ensure the protection of prime agricultural areas for agricultural purposes.
2023: See Appendix “D” to Report PED23145. 2024: Policy 4.3.5.2 is modified by replacing “surrounding agricultural lands and operations” with “agricultural systems”.	No comment.
2024: Section 4.3.6 “Supporting Local Food and the Agri-food Network” is added. Policy 4.3.6.1 is added which reads: “Planning authorities are encouraged to support local food, facilitate near-urban and urban agriculture, and foster a robust agri-food network”.	The City supports the inclusion of this policy.
4.4 Minerals and Petroleum	
Numbering changes only.	No comment.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from Current Provincial Policy Statement, 2020	2024 Comments
Chapter 4: Wise Use and Management of Resources	
4.5 Mineral Aggregate Resources	
2023: See Appendix “D” to Report PED23145. 2024: No change.	No comment.
4.6 Cultural Heritage and Archaeology	
2023: See Appendix “D” to Report PED23145. 2024: No change.	The 2024 version of the proposed PPS maintains the replacement of “significant” with “protected heritage property”. The City reiterates the comments previously provided on the 2023 version of the proposed PPS.
2023: Proposed policy 4.6.4 a) revises current PPS policy 2.6.4. 2024: No change.	The City does not have any concerns with this policy revision as it is consistent with the City’s Built Heritage Inventory (BHI) Strategy as outlined in the previous comments submitted in 2023.
2023: Proposed policy 4.6.5 revises previous PPS, 2020 policy 2.6.5. 2024: No change.	The City does not have any concerns with this policy revision as early engagement with indigenous communities when identifying, protecting and managing cultural heritage resources is already a best practice and is reflected in the City’s Archaeology Management Plan (AMP) and Indigenous Archaeological Monitoring Policy.
Chapter 5: Protecting Public Health and Safety	
5.1 General Policies for Natural and Human-Made Hazards	
2023: See Appendix “D” to Report PED23145. 2024: No change from 2023 version.	The City reiterates the previous comments that do not support the elimination of reference to a changing climate. Reference to a changing climate should be included within the preamble.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 6: Implementation and Interpretation	
6.1 General Policies for Implementation and Interpretation (Continued)	
<p>2023: See Appendix “D” to Report PED23145.</p> <p>2024: No change.</p>	<p>The 2024 version of the proposed PPS does not add back the policy stating the official plan is the most important vehicle for implementation of the PPS. The City reiterates the previous comments provided in 2023.</p>
<p>Other wording changes as outlined in PPS Comparison.</p>	<p>In the current Provincial Policy Statement, it is recognized that evaluation of natural heritage features may be required to determine significance. This recognizes that nature is dynamic. The removal of this reference in policy 6.1.5 is not supported.</p> <p>To allow for further flexibility, the statement “To determine the significance of some natural heritage features and other resources, evaluation may be required” should be included within policy 6.1.5.</p> <p>The City reiterates the previous comments raising concern about the removal of reference to further evaluation to determine the significance of natural heritage features.</p>
<p>2024: Revises policy 6.1.11 to include designated growth areas in addition to strategic growth areas.</p>	<p>This relates to the addition of designated growth areas as a defined term. See comments in the definitions section below.</p>
<p>2024: Adds policy 6.1.12 as follows which is adapted from policy 5.2.5.1 of the Growth Plan:</p> <p>“Density targets represent minimum standards and planning authorities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of this Policy Statement or any other provincial plan.”</p>	<p>The City of Hamilton already exceeds various minimum targets established in the Growth Plan. The City is supportive of the inclusion of this policy which clarifies that density targets are minimums as adapted from policy 5.2.5.1 of the Growth Plan. However, this should be clearly stated in the related policies, and not just in the implementation chapter.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 6: Implementation and Interpretation	
6.1 General Policies for Implementation and Interpretation (Continued)	
<p>2024: Adds policy 6.1.13 as follows: “Minimum density targets will be revisited at the time of each official plan update to ensure the target is appropriate.”</p>	<p>The City is supportive of reevaluating the minimum density targets at the time of each official plan update. This would be consistent with a municipal comprehensive review where municipalities can currently reevaluate existing growth targets.</p> <p>Stronger language is requested to prohibit private applications for changes in density targets. Applications/requests for changes outside of an official plan update process should not be permitted.</p>
6.2 Coordination	
<p>2023: See Appendix “D” to Report PED23145. 2024: No change.</p>	<p>The proposed PPS, 2024 does not provide further guidance on the requirements for early engagement with Indigenous communities. The City reiterates the previous comments from 2023.</p>
<p>2023: See Appendix “D” to Report PED23145. 2024: No change.</p>	<p>The City reiterates the previous comments respecting the proposed policy to encourage early engagement with the public and stakeholders. There are still a number of changes as described in the previous comments which are contrary to this policy direction.</p> <p>Engagement on the proposed PPS has been limited with a short review window to allow municipalities to fully consider and comment on the wide-reaching implications of the new policy directions. The Province has not engaged early with municipalities on the development of the proposed PPS.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 6: Implementation and Interpretation	
6.2 Coordination (Continued)	
2023: See Appendix “D” to Report PED23145. 2024: No change.	No further comment.
2023: See Appendix “D” to Report PED23145. 2024: Renumbered to 6.2.8.	The City of Hamilton supports this policy addition to the PPS as identified in the 2023 comments.
2024: Adds two new policies after policy 6.2.4 quoted below: Planning authorities shall collaborate with publicly-assisted post-secondary institutions, where they exist, to facilitate early and integrated planning for student housing that considers the full range of housing options near existing and planned post-secondary institutions to meet current and future needs.” Further to policy 6.2.5, “planning authorities should collaborate with publicly-assisted post- secondary institutions on the development of a student housing strategy that includes consideration of off-campus housing targeted to students”. All policies remain; however the numbering has changed.	The City has concerns with proposed policies 6.2.5 and 6.2.6 in the updated proposed PPS, 2024 as they relate to the proposed Amendment to the <i>Planning Act</i> under Bill 185 which exempts post-secondary institutions from the requirements of the <i>Planning Act</i> . Proposed policies 6.2.5 and 6.2.6 are not of concern on their own as the City supports collaboration with post-secondary institutions to facilitate an appropriate amount of student housing. The City also seeks clarification on what needs to be included in a student housing strategy and how it relates to the Bill 185 legislative amendments exempting Universities from being subject to local planning.

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 7: Definitions	
<p>2024: Definition of Affordable is added.</p> <p>Definition of Agricultural System is modified, removing reference to the agricultural land base being “based on mapping provided by the Province where mapping is available and requested”. It is also modified by adding “it may also include” rural lands and replacing “together” with “help to” create a continuous productive land base for agriculture.</p> <p>Definition for Designated Growth Areas is added.</p> <p>Definition for Employment Area is modified adding that “An employment area also includes areas of land described by subsection 1(1.1) of the <i>Planning Act</i>.”</p> <p>Definition for Energy Storage System is added.</p>	<p>Affordable: Supportive of adding back the definition of affordable in the PPS as these policies provide a clear and consistent measure for municipalities to use for the formulation of housing policies, targets, and related initiatives like Inclusionary Zoning. However, the City maintains its concerns with respect to the definition of affordable which was submitted to the Province through ERO 019-7669.</p> <p>Agricultural System: It is unclear what the agricultural land base will be based on if the mapping is not provided by the Province.</p> <p>The definition has been changed slightly. It now includes “agri-food sector” instead of “agricultural sector”. A clear definition of “agri-food sector” has not been provided. This should be included within the definition.</p> <p>Designated Growth Area: This definition appears to be adapted from designated greenfield areas – see policy 2.1.4 a).</p> <p>Employment Areas: Related to changes proposed through Bill 97.</p> <p>Energy Storage System: No comments.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 7: Definitions (Continued)	
<p>The definition for Fish Habitat is modified replacing “spawning grounds” with “water frequented by fish”. Spawning grounds is included as an example of an area on which fish depend directly or indirectly to carry out to their life processes.</p> <p>The definition of Infrastructure is modified by adding “broadband” as an example of communications/telecommunications infrastructure.</p> <p>The definition of Intensification is modified by adding “and underutilized shopping malls and plazas” as examples of redevelopment.</p> <p>Definition for Low and Moderate Income Households is added.</p> <p>The definition for Major Transit Station Area is modified removing “representing about a 10 minute walk”.</p> <p>The definition for Multi-modal is modified including “higher order transit” as an example of a form of transportation. “Commuter” is removed as an example of rail transportation.</p> <p>The definition for Negative Impact is modified replacing “permanent” with “harmful”.</p>	<p>Fish Habitat: The definition has been changed to remove “spawning grounds” and include “water frequented by fish”. The revisions align with the <i>Fisheries Act</i> definition of fish habitat. There is no concern with this change.</p> <p>Infrastructure: No comment.</p> <p>Intensification: The City of Hamilton is supportive of including underutilized shopping malls and plazas as examples of redevelopment.</p> <p>Low and Moderate Income: See comments on affordability.</p> <p>Major Transit Station Areas: No comment.</p> <p>Multimodal: No comment.</p> <p>Negative impact: b) Fish Habitat: The definition has been changed slightly to remove “any permanent alteration” and is replaced with “any harmful alteration”. The revision aligns with the terminology used in the <i>Fisheries Act</i>. There is no concern with this change.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 7: Definitions (Continued)	
<p>The definition for Prime Agricultural Area is modified to specify that planning authorities may identify prime agricultural areas “based on provincial guidance or informed by mapping obtained from the Ontario Ministry of Agriculture, Food and Rural Affairs”.</p> <p>The definition for Protected Heritage Property is modified by combining the last three bullets into one and reintroducing the previously removed reference to the “Standards and Guidelines for the Conservation of Provincial Heritage Properties”.</p> <p>The definition of Residence surplus to an agricultural operation is modified by replacing “an existing habitable farm residence..” with “one existing habitable detached dwelling..”.</p> <p>The definition of Strategic Growth Areas is modified by removing “urban growth centres” as an example of Strategic Growth Areas and adding “existing and emerging downtowns” and “lands adjacent to publicly assisted post-secondary institutions” as Strategic Growth Areas. Underutilized shopping malls and plazas are also added as examples of redevelopment.</p>	<p>Prime Agricultural Area: Within this definition there is a change in who determines “prime agricultural areas”. The onus has been placed on municipalities instead of on the Province. It is unclear what level of oversight will be involved and how (or by who) guidance/mapping will be updated.</p> <p>Protected Heritage Property: There are minor administrative changes to the definition of protected heritage property, but the intent of the definition remains the same.</p> <p>Residence surplus to an agricultural operation. No comment.</p> <p>Strategic Growth Areas: Replaces urban growth centres with “existing and emerging downtowns” and adds lands adjacent to publicly assisted post-secondary institutions.</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 7: Definitions (Continued)	
<p>The definition of Transit-supportive is modified by adding “Approaches may be recommended in guidelines developed by the Province or based on municipal approaches that achieve the same objectives.”</p> <p>The definition for Urban Growth Centres is removed.</p> <p>A definition for Urban Agriculture is added.</p> <p>The definition for Watershed planning is modified by adding “Watershed planning evaluates and considers the impacts of a changing climate on water resource systems and is undertaken at many scales.”</p>	<p>Transit-supportive It is unclear what alternative approaches could be.</p> <p>Urban Growth Centres. See comments above on Section 2.4 Strategic Growth Areas.</p> <p>Urban Agriculture: Examples have been included within the definition, however, it is unclear if there will be guidance provided by the Province. The definition should be revised. See comments above.</p> <p>Watershed Planning: A definition of watershed planning has been provided. This definition does not appear to be the same as the one found within the Growth Plan. The Growth Plan definition should be retained.</p> <p>Growth Plan Definition: “Planning that provides a framework for establishing goals, objectives, and direction for the protection of water resources, the management of human activities, land, water, aquatic life, and resources within a watershed and for the assessment of cumulative, cross-jurisdictional, and cross-watershed impacts.”</p>

City of Hamilton Comments on Proposed Provincial Planning Statement, 2024

Summary of Proposed Changes from current Provincial Policy Statement, 2020	2024 Comments
Chapter 7: Definitions (Continued)	
Watershed planning (Continued)	<p>Watershed planning typically includes: watershed characterization, a water budget, and conservation plan; nutrient loading assessments; consideration of the impacts of a changing climate and severe weather events; land and water use management objectives and strategies; scenario modelling to evaluate the impacts of forecasted growth and servicing options, and mitigation measures; an environmental monitoring plan; requirements for the use of environmental best management practices, programs, and performance measures; criteria for evaluating the protection of quality and quantity of water; the identification and protection of hydrologic features, areas, and functions and the interrelationships between or among them; and targets for the protection and restoration of riparian areas. Watershed planning is undertaken at many scales, and considers cross jurisdictional and cross-watershed impacts. The level of analysis and specificity generally increases for smaller geographic areas such as subwatersheds and tributaries”.</p>