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ERO 019-8462 Review of proposed policies for a new provincial planning policy instrument

Thank you for the opportunity to provide input on the proposed Provincial Planning Statement (PPS). Please note that the following comments and recommendations are provided by Peel Region in response to the above posting. If additional comments are provided through a Council resolution, they will be forwarded to the Ministry of Municipal Affairs and Housing for consideration.

Please note that Peel staff have provided separate comment responses on the Environmental Registry of Ontario (ERO) and Ontario Regulatory Registry postings relating to changes to the *Planning Act*, *Municipal Act*, and Newspaper Notice Requirements in *Bill 185, Cutting Red Tape to Build More Homes Act, 2024*.

Peel staff's detailed comments are provided in Appendix I, which identifies suggestions for the proposed PPS based on Peel's subject matter expertise in these areas. At a high-level, recommended policy directions should:

- Mandate consistent use of growth forecasts to prevent fragmented planning and ensure alignment in population, employment, and housing projections.
- Implement standardized land assessment methodologies, protect agricultural lands, and support sustainable development.
- Strengthen policies to ensure the provision of long-term affordable housing and explore and promote public-private partnerships and non-profit approaches for diverse and equitable housing solutions.
- Require thorough land needs assessments for settlement area boundary expansions to consider environmental, agricultural, and infrastructural impacts to balance housing needs with asset protection, and promote compact urban development and financially sustainable growth.
- Preserve economic diversity in Areas of Employment by maintaining a mix of uses, including office, and introduce stringent land use conversion controls to reflect evolving economic demands and ensure land use compatibility.
- Introduce stringent climate action measures by mandating risk assessments, integrating renewable energy systems, and requiring detailed climate impact studies for infrastructure planning and settlement area boundary expansions.

- Mandate protective measures for natural heritage using definitive language and strategies to ensure uniform environmental protection for a broader systems-based approach.
- Require comprehensive watershed planning, including sub-watershed studies for major developments, and integrate climate change and green infrastructure considerations into water management strategies.
- Continue to maintain the protection standard of the 2020 PPS for settlement area boundary expansion into specialty crop and prime agricultural areas, restrict non-farm residential development and severance in prime agricultural areas including through farm consolidation, and provide detailed provincial guidance for the identification of the Agricultural System and Agricultural Impact Assessments.

Peel looks forward to continuing to work with the Province, local municipalities, and other stakeholders to meet Ontario's housing needs. I would be pleased to provide any clarifications or additional comments on these matters.

Yours Respectfully,

A handwritten signature in black ink that reads "Tara Buonpensiero". The signature is written in a cursive, flowing style.

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Appendix I

Proposed Provincial Planning Statement

Region of Peel staff comments on ERO 019-8462: Review of proposed policies for a new provincial planning policy instrument

General Comments

Peel staff recognize the significance of Ontario's current housing issues and appreciate the Province's efforts to increase housing supply, improve affordability, and provide comprehensive policy direction on land use planning matters. These are important issues that require integrated solutions.

The proposed Provincial Planning Statement (PPS), while combining elements of the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow), 2019, represents a significant streamlining of policy direction and fundamental change to the policy-led planning framework in Ontario. While Peel supports streamlining to increase housing supply, it is important that policy direction balance multiple planning objectives including infrastructure, affordability, employment, equity, diversity and inclusion, Indigenous engagement, and protection of resources, agriculture, water, and natural systems.

Municipalities play a critical role in planning and coordinating infrastructure and services across municipal boundaries to support growth. Supporting this role will result in continued strategic planning of services to ensure efficient growth management and alignment of development with infrastructure capacity. Some of the directions in the PPS, however, could result in discretionary and fragmented decision-making resulting in unintended consequences such as uncoordinated, more costly, and delayed infrastructure and development. Peel is committed to moving forward with the Province on common objectives and implementing policy direction to help address shared planning challenges.

Specific Comments

Growth Forecasts and Targets

It is appreciated that the Province has made strides to standardize growth forecasts by mandating that municipalities base their population and employment projections on the Ministry of Finance (MOF)'s 25-year forecasts while permitting municipalities to continue using forecasts previously issued by the Province for land use planning purposes.

While incorporating MOF forecasts alongside other methodologies can offer flexibility and prevent municipalities from underestimating growth, the lack of consistency in growth forecasting methodologies could result in fragmented decision-making across municipalities, potentially leading to adverse outcomes in infrastructure planning. For instance, MOF forecasts do not consider infrastructure capacity and land availability being calculated for census divisions and often do not align with the local context of lower-tier municipalities. Additionally, as MOF forecasts only project population, there are questions as to how employment and economic

growth will be measured as part of infrastructure planning and building complete communities in a sustainable manner.

The variety of projections and analytical methods used across documents (i.e. Official Plans, existing, increased 2031 municipal housing targets from Bill 23, and MOF projections) could create unintended confusion and inconsistency. Municipalities continue to update forecasts to align with targets assigned through municipal housing pledges.

In addition, the proposed PPS does not contain specific growth forecasts and minimum intensification and density targets that are part of the Growth Plan. This could result in an uncoordinated and inconsistent vision and result in development that is not efficient from the perspective of achieving growth targets. Efforts should be made to maximize the use of existing urban land and infrastructure, supporting transit, minimize the need to convert additional agricultural land for residential purposes, use existing urban land and infrastructure, and support transit.

Recommendations:

- The Province should provide clear guidance and clarity on how to effectively and consistently forecast population, housing and job trends, and how to adapt to MOF data.
- Specific growth forecasts and targets should be coordinated between municipalities to ensure alignment and that the planning and financing of infrastructure can be staged in a systematic way to achieve the objective of building more homes faster.

Land Assessment Methodology

Introducing a 20 to 30-year limit to serviced land availability within each Official Plan and Official Plan Amendment (OPA) aligns with infrastructure availability and planning. Consideration should be given, however, to avoid the premature designation of agricultural lands for development that could compromise the agricultural system and the agri-food network. Clarity is needed, however, on policy 2.1.3 on whether the 2020 provincial Land Needs Assessment (LNA) standard methodology remains in effect or if new provincial guidance will be issued. In addition, the introduction of policy 2.3.2.1 allowing for new settlement area creation and settlement area boundary expansion outside of an Official Plan or OPA could potentially compromise the planning, phasing, and financing of growth efforts.

Lastly, there is a need for more detailed strategies for coordination and financing aligned with growth projections and how this would be implemented to provide more effective support and sustainability of community growth and development.

Recommendation:

- Include a standardized Land Needs Assessment methodology and strengthen policies for infrastructure planning by reconsidering the removal of key policies addressing study requirements and infrastructure planning.

Housing

The re-introduction of a definition for affordable housing and low and moderate income households that incorporates income-based factors and minimum targets for affordable housing will provide important policy direction that will strengthen efforts to plan, fund, and secure more affordable housing. It is also appreciated that there are increased references to affordable housing. Peel, as service manager for housing, plays a key role in addressing housing issues and addressing the full range of housing options, including non-market housing such as supportive housing.

Policy direction could be strengthened by encouraging and including a minimum affordability period to support long-term affordability of units (such as 25 years or more for rental units and in perpetuity for ownership units). In addition, the definition of housing options should reference affordability and there are opportunities for the PPS to emphasize opportunities to leverage the development review process and land use approvals to secure affordable housing supply. More generally, the PPS and associated Provincial legislation and policy can speak directly to how housing affordability types are intended to be delivered and the importance of considering large-scale public-private partnerships and non-profit approaches involving all levels of government.

While it is appreciated that the PPS includes increased references to the development and redevelopment of underutilized commercial and institutional sites, such as for residential use, greater clarity is needed on criteria used to determine what is considered “underutilized” and if this is determined by the approval authority or development applicant.

It is appreciated that the PPS incorporates references to support affordable, accessible and equitable housing. Greater clarity is requested on the meaning of “equitable housing”.

Recommendations:

- Provide clear guidelines on what constitutes “underutilized” commercial and institutional sites and identify who is responsible for making this assessment.
- Amend the definition of housing options to reference affordability.
- Include or encourage references to a minimum affordability period (e.g., 25 years to perpetuity) to support long-term affordability of units.

Settlement Area Boundary Expansion

Peel staff believe there can be a balance achieved between making more land available for housing while also protecting existing assets such as natural resources. Given the potential significant impact to existing communities through one-off expansions, planning criteria for settlement area boundary expansions should require a sufficiently rigorous assessment of need and impacts related to the environment, agricultural lands, resources, and the technical and financial feasibility of providing public infrastructure and services. An overly streamlined and permissive policy framework with minimal evaluation tests could lead to the inefficient use of land, resources, and infrastructure.

The proposed PPS introduces permissive language that softens policies that would otherwise consider factors such as land use needs and infrastructure capacity before permitting settlement area boundary expansions. This adds uncertainty to the task of aligning infrastructure planning and planning for sustainable, complete communities. Settlement area boundary expansion should be based on a Land Needs Assessment with consideration for viable infrastructure servicing to accommodate growth. The assessment of impacts to the environment, including to natural and water resources systems and prime agricultural areas, should be included with flexibility to scope the level of detail of the assessment based on study needs.

The proposed revoking of the Growth Plan that removes policies limiting when settlement expansions can be considered and removing comprehensive criteria for settlement area expansions is concerning as it could compromise technical and financial feasibility.

The proposal of less stringent justifications for settlement area boundary expansions will have significant implications for the protection of the Province's Agricultural System, including the agricultural land base. Peel staff are concerned that the proposed policy direction weakens the Provincial direction for the protection of the agricultural land base, such as language that permits planning authorities to only consider "whether" settlement area boundary expansions do not comprise specialty crop areas, whether it complies with the Minimum Distance Separation Formulae, and whether there is avoidance/mitigation of impacts to the prime agricultural area and Agricultural System.

The limiting of third-party appeal rights to the applicant, Minister, public bodies and specified persons for settlement area boundary expansions, will limit the ability of Peel Region to appeal. Bill 185, as proposed, does not include Peel as a public body. As settlement area boundary expansions will not be undertaken by Peel under the new PPS, there is no mechanism to ensure that settlement expansions consider the ability of the Region, as a service and infrastructure provider, to meet the projected needs and address any conflicts.

Recommendations:

- Settlement area boundary expansion policies in the Growth Plan should include requirements for considering alternative locations, phasing, and promoting intensification and compact urban form. Expansions should be based on a Land Needs Assessment with consideration for viable infrastructure servicing to accommodate growth. The assessment of impacts to the environment, including to natural and water resources systems and prime agricultural areas, should be included with flexibility to scope the level of detail of the assessment based on study needs.
- Require planning authorities to establish density targets for new settlement areas or settlement area expansion lands to provide for a consistent planning approach across municipalities.
- Strengthen language regarding phasing policies (2.3.1.2) to mandate that planning authorities "shall" establish and implement phasing policies where appropriate.
- Reinstate the "do not comprise" restriction for settlement area boundary expansions into specialty crop areas in the proposed PPS policy 2.3.2.1 c).
- Retain the PPS 2020 settlement area boundary expansion policies that restricts development into specialty crop areas and requires planning authorities to demonstrate, rather than consider whether there is impact of the settlement area boundary expansion on the prime agricultural area, compliance with the Minimum Distance Separation Formulae, and completion of an Agricultural Impact Assessment based on provincial guidance, as existing PPS 2020 policies clarify the tests of "reasonable alternatives" and for "compliance".

Strategic Growth Areas

It is appreciated that new policies advance development by emphasizing the importance of identifying strategic growth areas and supporting complete communities. This includes supporting a range of housing options that are affordable, accessible, and equitable, alongside prioritizing infrastructure and public service planning to address servicing challenges. Clarity is requested on the meaning of "equitable housing".

Efforts to increase affordable housing and include a student housing strategy in strategic growth areas are appreciated. Student housing is in great need in Peel, which hosts many international students and has a number of colleges and university campuses. There is a shortage of rental units for students and residents in general. Peel staff are committed to working with post-secondary institutions and other community partners to ensure that students have safe, legal, and affordable housing.

Policies regarding Major Transit Station Areas align with Peel's recommendations regarding promoting development and intensification, enhancing multi-modal access to transit stations, and directing intensification on lands adjacent to existing and planned frequent transit corridors.

Policy direction (2.4.2.3) regarding MTSAs, however, could be strengthened by requiring rather than encouraging development and intensification within MTSAs.

The use of permissive wording in strategic growth areas, however, potentially weakens municipal mandates. For instance, policy 2.4.1.3 could be strengthened by requiring planning authorities to prioritize infrastructure planning and investment, an appropriate type and scale of development, and development and intensification in strategic growth areas.

Recommendations:

- Revise 2.4.1.3 to specify that planning authorities “shall” prioritize infrastructure planning and investment, an appropriate type and scale of development, and development and intensification in strategic growth areas.
- Strengthen policy direction in 2.4.2.3 to require municipalities to promote development and intensification within major transit station areas.

Employment Areas

Peel staff are supportive of proposed employment area policies that promote a flexible mix of employment, institutional, and broader uses in employment areas. These areas, however, need to be protected from non-employment uses, such as residential and retail, to maintain their economic viability and safeguard jobs.

The proposed PPS does not fully address Peel's need for more flexible definitions and broader economic activities within employment areas, which are essential for economic diversity and resilience. Policies also lack a detailed mechanism for managing employment land conversions, risking less controlled changes and potential misalignment with long-term planning objectives.

The definition of Areas of Employment continues to exclude institutional uses and commercial uses (such as office and retail) with the exception of commercial uses associated with primary manufacturing, research and development, and warehouse uses. Peel has long been invested in planning for employment areas to support Provincial directions and the economic development objectives of its local municipalities. As such, employment areas in Peel have been established to attract and maintain a variety of employment uses to ensure Peel-specific and Provincial employment forecasts can be met. Strong policies have been in place to preserve the long-term viability of employment areas by avoiding, minimizing, or mitigating the adverse impacts of residential development and other sensitive land uses on employment areas. Many successful employment areas in Peel contain a mix of manufacturing, warehousing, and office uses.

The proposed PPS allows municipalities to consider employment area conversions outside of a municipal comprehensive review, subject to the condition that sufficient employment land is available to accommodate employment growth. Increased flexibility in undertaking employment

area conversions and the proposed redefinition of Area of Employment could potentially compromise the long-term viability of municipal employment and may result in a loss of employment lands. The proposed redefinition of Area of Employment could potentially put office and other uses within established employment areas at risk of being replaced by residential development. The loss of these uses could result in job reductions, hamper efforts to meet employment targets, and create servicing challenges. In addition, the proposed definition could lead to employment areas exposed to potentially incompatible uses, which could have impacts on overall health protection.

Recommendations:

- Maintain the inclusion of office uses within the definition of Area of Employment as currently established in subsection 1 (5) (c) of the *Planning Act*. Should the definition be approved as proposed, Peel staff recommend retaining Policy 2.2.5.14 of the Growth Plan that requires development criteria for any redevelopment outside of employment areas to ensure space is retained for a similar number of jobs to remain accommodated on site.
- Allow for broader definitions of employment areas and include a wider range of permissible economic activities within employment areas to better reflect the evolving economic landscape and support regional economic development.
- Establish a detailed mechanism for managing conversions of employment lands to other uses, ensuring that such conversions are strategically overseen and aligned with long-term planning goals to prevent the dilution of employment-focused land use.
- Provide detailed guidelines on how to manage the exclusion of commercial and institutional uses from employment areas, ensuring compatibility, and reducing potential land use conflicts.
- Implement mandatory assessments for air quality, land use compatibility, and overall health protection when industrial and small-scale warehousing uses are proposed near sensitive land uses such as residential areas. This will help mitigate potential health risks and ensure that development is both safe and compatible with existing land uses.
- Clearly delineate jurisdictional responsibilities for assessing land use compatibility and ensure that existing guidelines and study requirements are rigorously applied to any proposed or permitted developments to enhance coordination between different ministries and provide clearer guidance for developers and planners.

Energy Conservation, Air Quality and Climate Change

The PPS aligns with Peel's sustainability goals by encouraging compact, transit-supportive communities, integrating climate considerations into planning, and emphasizing energy conservation and green infrastructure. These measures reflect Peel's commitment to sustainable land use and improved air quality and supports research that shows the mental health benefits of green spaces.

The PPS, however, lacks aggressive policies for mitigating greenhouse gas emissions and detailed guidance for municipalities on energy use and emissions reduction. It encourages, but does not mandate, comprehensive assessments of climate-related risks and vulnerabilities, nor does it require the integration of renewable energy systems into planning decisions. More directive and target-specific policies are required.

Recommendation:

- Require that climate related risks and vulnerabilities be addressed in municipal climate change approaches. Require that municipalities facilitate the introduction of renewable and alternative energy systems including district energy to support greenhouse gas emission reduction in planning decisions.

Infrastructure Planning

The PPS aligns with several of Peel's recommendations for infrastructure planning that emphasize the efficient provision and coordination of infrastructure with land use and growth management. This will help to ensure financial viability and support Peel's emphasis on fiscal responsibility, the optimization of infrastructure, and sustainability. Policies that require infrastructure to be strategically located to support emergency services, public health, and public service facilities further Peel's promotion of healthy site design, such as in the development of new schools and retrofits of existing schools.

PPS policies, however, lack specific measures for protecting provincial resources during infrastructure planning and could more explicitly direct integrating climate change considerations. Additionally, while it supports efficient land use, the PPS does not explicitly prioritize intensification or establish it as a key principle for sustainable growth. The PPS also omits requirements for detailed assessments of climate change impacts on infrastructure planning, which is critical given the increasing frequency and severity of climate-related challenges.

Furthermore, while the enhanced capability to allocate and reallocate unused services capacity will promote coordination between municipalities and improve the efficient utilization of resources, it is crucial to maintain a balance in the current planning and development landscape, particularly as we aim to encourage the construction of housing units. We must carefully consider the impact of reallocating unused services on the maintenance of a three-year supply of serviced lands.

Recommendations:

- Require an integrated and coordinated approach to planning, including requiring considerations for climate change and air quality.

- Retain requirements that land use and infrastructure planning consider climate change, assess infrastructure risks and vulnerabilities, and provide infrastructure in a manner that prepares for the impacts of climate change.

Natural Heritage

The PPS addresses essential aspects of environmental conservation, aligning with Peel's priorities for robust standards in protecting natural features and promoting ecosystem management. It mandates the long-term protection of key natural areas and emphasizes the maintenance and enhancement of ecological functions and biodiversity. Specific policies also prevent development and site alterations in ecologically sensitive zones like wetlands and wildlife habitats, reflecting Peel's advocacy for stringent environmental safeguards.

The PPS could be improved in several areas to ensure more effective and comprehensive environmental management. It lacks tailored approaches for large and fast-growing municipalities, particularly where there is no upper-tier municipality with planning authority, which may lead to a piece-meal approach and inconsistent environmental protection measures across local jurisdictions.

Use of terms such as "encourage" or "consider" instead of "should" or "shall" weakens policies as requirements should produce stronger outcomes. In addition, the definition of "Significant" and the guidelines for interpreting "negative impacts" require further detailed guidance to ensure consistent application across the province and support decision-making.

Recommendations

- Revise the PPS to use more definitive language, replacing terms like "encourage" and "consider" with "shall" where stronger regulatory outcomes are intended. This change should be clearly explained to ensure all stakeholders understand the goal of strengthening the requirements.
- Introduce specific policies or guidelines for areas without an upper-tier municipality with planning authority to ensure a cohesive, system-based approach to environmental management, preventing piecemeal approaches by local municipalities.
- The Province should issue comprehensive and updated guidance documents such as the Natural Hazard Technical Guidelines, Watershed and Subwatershed Planning Guides, and the Natural Heritage Reference Manual. This would support consistent application of the PPS and aid in decision-making, especially in evaluating the significance of natural features and assessing potential negative impacts.
- Retain the current level of protection for non-Provincially significant wetlands as outlined in the Growth Plan and introduce additional provincial guidance to protect these wetlands both within and outside of settlement areas.

Water

The PPS includes policies on advanced watershed-based planning, which aligns with Peel's comprehensive environmental management strategies and recognizes that the watershed is the essential scale for integrated, long-term planning. Peel staff are supportive that the PPS mandates the protection, improvement, and restoration of water quality and quantity, aiming to minimize impacts and maintain water resource system functions. The PPS also supports the identification and maintenance of linkages within water resource systems, which is crucial for Peel's detailed water management approach.

The PPS specifically requires large and fast-growing municipalities like Peel to undertake watershed planning, addressing the need for policies that respond to the challenges and capacities of larger municipalities. It also encourages collaborative planning efforts among various municipal tiers and conservation authorities, bolstering integrated regional planning capabilities.

Proposed policies, however, lack specific requirements for significant development plans in new settlement areas to incorporate subwatershed studies or equivalent detailed studies, which is crucial for precise planning. There is also a lack of flexibility in scoping watershed planning studies based on local needs and the lack of a mandate to address climate change impacts or integrating green infrastructure strategies in these studies, which are critical for adapting to environmental changes.

Policies could be strengthened by identifying the reason why watershed planning must be undertaken, such as to protect biodiversity and support growth management and infrastructure.

Recommendations

- Amend the PPS to clearly state the purposes of watershed planning, such as protecting biodiversity, managing growth effectively, and supporting infrastructure services, to guide stakeholders towards a more purpose-driven approach.
- Formalize the requirement for Conservation Authorities to work in concurrence with municipalities, leveraging their historical expertise in watershed management to ensure cohesive and integrated regional planning.
- Mandate that significant development plans, especially in new settlement areas, include subwatershed studies or equivalent detailed analyses to ensure well-informed planning decisions.
- Allow for adaptability in scoping watershed planning studies to meet local conditions, enabling municipalities to effectively tailor their environmental strategies.
- Explicitly require the inclusion of climate change impact assessments and green infrastructure strategies in watershed planning to enhance environmental resilience and adaptability.

Agriculture

Ontario's Agricultural System annually provides billions of dollars in gross farm receipts leading to direct, induced, and indirect annual impacts to the Provincial "Grow Ontario" agricultural economy. Peel staff look forward to continued discussions on Provincial policy and the development of guidance on how to protect, enhance and support the Province's Agricultural System's agricultural land base and agri-food network, to further grow the agricultural sector in Ontario.

The 2024 PPS outlines measures to protect prime agricultural areas by specifying conditions under which additional residential units may support farm operations, while also restricting the creation of new, non-farm residential lots.

However, there are gaps in this approach, particularly regarding the protection of specialty crop areas. Proposed policies decrease protection levels, especially noticeable in policy 2.3.2.1c, which contrasts with the higher protection standard for specialty crop and prime agricultural areas, found in section 4.3.1.

While policies permitting consents for multiple, non-farm residential lots in prime agricultural areas have been removed, there is still the permission of additional residential units on non-farm lots in the prime agricultural area. The introduction of additional non-farm residential units introduces more land use conflicts in agricultural areas that will impede the normal farm practices of farm operations. Non-farm residential development should be directed to settlement areas with stricter criteria and justification tests for settlement area boundary expansions.

Permission for consents of surplus dwellings through farm consolidations introduces the potential creation of three new, non-farm rural residential lots into the prime agricultural area. The introduction of additional non-farm rural lots will lead to scattered lot creation, erosion of the agricultural land base, and introduction of more land use conflicts in the prime agricultural area.

The identification of the Agricultural System by a planning authority, Agricultural Impact Assessments and permitted uses in the prime agricultural area, are proposed to be based on criteria and guidance developed and provided by the Province. Comprehensive and directive guidance materials, provided in a timely manner, are necessary to ensure that municipalities can continue to rely on a strong framework for informed decision-making.

The new proposed policy that recognizes the importance of supporting local food, near-urban and urban agriculture production, and the agri-food network as part of the Agricultural System is encouraged. It recognizes the robust local food guide initiatives undertaken by Region's, and the different types and landscapes of agricultural production occurring across the Province.

Recommendations

- Amend policy 2.3.2.1 c) to align with the long-standing protection standards for specialty crop areas of the PPS 2020, and in proposed policy 4.3.1.
- Direct non-farm residential development to settlement areas and restrict additional residential dwellings in the prime agricultural area to farm properties. Additional residential dwellings should be limited to a subordinate accessory farm dwelling or bunkhouse within the existing farm cluster which is restricted from future severance, including through farm consolidation.
- Ensure the Province provides guidance on the identification of the Agricultural System, Agricultural Impact Assessments and permitted uses in prime agricultural areas, in a timely manner, to support informed and consistent application of the PPS across municipalities. Further policy guidance on how the Province defines “near-urban agriculture” and “urban agriculture” is requested.

Implementation and Interpretation:

The proposed PPS supports Peel's urban planning objectives with its integrated approach, reiterating the importance of monitoring and reporting and protecting provincial interests.

The proposed policy direction, however, does not fully address the challenges specific to large municipalities, such as managing complex growth, resolving uncertainties between new and existing plans, addressing financial uncertainties in planning, and integrating housing needs with long-term forecasts.

In addition, Policy 6.1.4 that permits the Minister to make decisions without public input and debate is concerning, particularly if there are environmental, sustainability, public health, or infrastructure concerns.

Recommendations

- Introduce targeted measures to address the unique challenges of managing growth in large municipalities, ensuring flexibility in the PPS to accommodate urban complexities.
- Provide clear guidance on resolving potential conflicts and ambiguities between the PPS and existing regional plans, ensuring smooth policy integration.
- Include specific provisions on financial planning for infrastructure and services to aid municipalities like Peel in effective budgeting without clear growth targets.
- Develop guidelines for integrating housing needs assessments with long-term forecasts, allowing for accurate future housing planning.
- Recognize and enhance collaboration on student housing, addressing Peel's urgent need for safe, legal, and affordable student accommodations due to its high international student population and several academic institutions.