



May 10, 2024

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
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Toronto ON, M7A 2J3

Strategic Initiatives and
Government Relations
Office of the CAO
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RE: Proposed Provincial Planning Statement, 2024 – ERO #019-8462

Dear Sir/Madam:

On April 10, 2024 the Province announced a wide range of changes to various acts and regulations and introduced a new proposed Provincial Planning Statement, 2024 (PPS, 2024). On April 17, 2024 Halton Regional Council received report [CA-11-24/FN-14-24 – April 10 Provincial Announcements](#) for information. This report provides an initial analysis of the changes and the following letter provides additional detailed comments. Halton Region recognizes that Bill 185 identifies the Region as an “upper-tier municipality without planning responsibilities” with an effective date of July 1, 2024. Given this change, the comments provided here are focused on Regional interests related to water and wastewater infrastructure, transportation systems, waste management, assisted housing etc.

The Region has a shared objective with the Province and its Local Municipalities to advance housing supply and support the Local Municipalities in meeting their housing pledges by proactively planning for, financing and delivering infrastructure. Regional Council has committed to support the planned growth, while protecting its taxpayers from the financial impact of growth.

Growth Forecasts

The PPS, 2024 now includes direction for municipalities to undertake forecasting work based on the Ministry of Finance 25-year projections, although flexibility is permitted to modify projections as appropriate or continue using population/employment forecasts previously issued by the Province. Additionally, there is flexibility in terms of the planning horizon between 20 and 30 years and that planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond the time horizon.

While the Halton Municipalities have a longstanding approach for integration and coordination of growth forecasting through the Memorandum of Understanding and Planning Estimates, the flexibility related to forecasting may present challenges for other jurisdictions that plan for large-scale infrastructure across multiple municipalities as different approaches could be used and the timing of updates undertaken by Local Municipalities may not align. Changes to forecasts on an ad hoc basis may present challenges in mobilizing servicing capacity given the protracted nature of planning for, designing and delivering significant water and wastewater infrastructure. These factors could create challenges when undertaking infrastructure master planning at an upper-tier without planning responsibilities, or create inequities between Local Municipalities with respect to the available servicing capacity.

Regional Municipality of Halton

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In addition to the above, the Ministers Zoning Orders are intended to be in addition to any projected needs for the planning horizon, however there is no requirement for input from the upper-tier municipality through the new criteria. Halton Region suggests that input from the upper-tier be solicited in making these decisions as it relates to the availability of infrastructure and associated capacity in addition to other services provided.

Affordable Housing

Halton Region supports the Province's decision to add the references and definition of housing that is *affordable* back into the proposed PPS along with the requirement for municipalities to establish and implement minimum targets for housing that is *affordable to low and moderate income households*. Halton continues to encourage the Province to provide direction on what the minimum targets should be along with tools that support municipalities in providing affordable and assisted housing.

Settlement Areas

The PPS, 2024 includes a policy that encourages planning authorities to establish and implement minimum targets for *intensification* and *redevelopment* within built up areas, encourages density targets for *designated growth area* and encourages a density target of 50 residents and jobs per hectare for *designated growth areas* within *large and fast growing municipalities*. Halton suggests that these policies could be strengthened by requiring municipalities to determine these base line numbers to make the most efficient use of new and existing infrastructure and ensure that more homes are built faster.

The PPS, 2024 now states that municipalities "shall" consider the list of criteria for settlement area boundary expansions rather than "should" in the 2023 PPS draft. The updated version also expands on the criteria to expand a settlement area related to need, infrastructure and agricultural considerations (no mention of environmental considerations) from what was proposed in the 2023 draft. These changes are improvements from the previous draft, however, there continues to be concern that these boundary expansions can occur at anytime by a municipality or private applicant. Further, with changes to the *Planning Act* through Bill 185, there will be appeal rights related to private applications for boundary expansions. These changes could allow for incremental changes that may have implications on comprehensive planning approaches for large-scale infrastructure and growth across multiple municipalities. Halton Region recommends that the Province consider only allowing boundary expansions through comprehensive planning processes that take into account population and employment projections, land needs and servicing.

Infrastructure Planning

The proposed PPS, 2024 maintains policies that prioritize planning and investment in infrastructure and public services to support strategic growth areas. This is positive as cost savings can be achieved by ensuring that existing infrastructure is optimized before new infrastructure is built. However, with the repeal of the Growth Plan, many of the detailed policy requirements for infrastructure capacity analysis, phasing, and efficiently utilizing existing infrastructure (i.e. promoting intensification and redevelopment within existing settlement areas) have been weakened or removed. The Province should consider maintaining detailed infrastructure policies from the Growth Plan to ensure that infrastructure is optimized, efficient and cost-effective and that comprehensive master planning continues.

Climate Change

The PPS, 2024 contains only general direction related to climate change and most of current Growth Plan and PPS, 2020 policies related to this emerging planning area have been removed or reduced. Considerations for planning authorities to avoid development and land use patterns which may cause environmental or public health and safety concerns and promoting development patterns that conserve biodiversity have not been carried forward. The PPS, 2024 should maintain references to climate change considerations throughout the various sections and continue to include more detailed policies within a climate change section. Further, there should be consideration for additional measures and tools to ensure that municipalities and agencies work in a coordinated way to address the impacts of a changing climate.

We trust that these comments will be of assistance to the Province as they continue to consider updates to the planning policy framework in Ontario in an effort to build homes faster. Please do not hesitate to reach out if you would like to discuss these comments further.

Sincerely,



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cc: Jane MacCaskill, CAO, Regional Municipality of Halton