

Attachment 2: City of Toronto Comments on the PPS 2024 Policies

ERO 019-8462 – Closing May 12, 2024

PPS 2024 Policy #	Comments	Recommendation
2.1	Planning for People and Homes	
<p>2.1.1</p> <p>Policy related to how municipalities will forecast population and employment growth</p>	<ul style="list-style-type: none"> • The new policy eliminates reference to the Growth Plan forecasts, and requires municipalities to use the Ministry of Finance 25-year projections as the basis of population and employment growth forecasts. • This is fundamentally flawed because forecasts contain judgements about long-term trends and changes in fundamental characteristics of population, households and employment change, whereas projections simply extend existing trends. Projections driving forecasts leads to short-term events driving long-term planning, whereas it should be the opposite. • The Growth Plan forecasts have proven to be a better reflection of the City's growth trajectory than the Ministry of Finance Projections. The Ministry of Finance Projections have not been realized and have consistently exceeded the actual population growth that has occurred as estimated by Statistics Canada. These projections are not a good reflection of the trajectory of the City's growth. • The Ministry of Finance Projections are revised annually and change significantly from one year to the next and thus are not suitable for long-range growth management. • The Ministry of Finance Projections are of population. The Ministry does not provide corresponding 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • The policy be amend to allow continued use of the existing Land Needs Assessment methodology as Provincial guidance to the large and fast-growing municipalities for assessing land needs as a complement to the Provincial Projections Methodology Guideline available to other municipalities. • The Province commits to leading a provincial-municipal process with large and fast-growing municipalities for the periodic preparation of regional population and employment forecasts that take into account urban structure and land use policy. Further, the Province enable and empower municipalities to adopt the resulting forecasts for land use planning and growth management, instead of the Ministry of Finance projections. • Proposed Policy 2.1.2 is ambiguous as to which projections it refers. Modify 2.1.1 so that it reads: "As informed by provincial

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	<p>employment projections. The Growth Plan employment forecasts are critical in municipal long-range planning. It will become the responsibility of each municipality to develop its own employment forecasts in order to drive local small-area projections of employment. This will complicate municipal land use planning, as well as regional transportation planning for which the municipal small-area employment projections are an important consideration.</p> <ul style="list-style-type: none"> • The proposed policy removes need to undertake a Land Needs Assessment in accordance with the method established by the Minister of Municipal Affairs and Housing. In the absence of regional coordination with GGH municipalities, it is likely that municipalities will adopt different methods which will complicate efforts to align and coordinate service and infrastructure delivery across the region. 	<p>guidance, planning authorities shall base population and employment growth forecasts on Ministry of Finance 25-year projections and may modify those projections, as appropriate.”</p>
<p>2.1.2</p> <p>Policy related to using previously issued population and employment forecasts</p>	<ul style="list-style-type: none"> • Enables a municipality to continue to utilize population and employment forecasts previously issued by the Province for the purposes of land use planning. • This would enable the City to continue to use the Growth Plan 2020 forecasts and the Technical Background Study of Hemson Consulting Ltd, 2020 as was used in its recent Municipal Comprehensive Review, Land Needs Assessment and the concurrent Official Plan Review. • As Policy 2.1.3 proposes a time horizon of at least 20 years, but not more than 30 years, it would be 	<p>Support in Principle</p> <p>If approved, recommend revisions:</p> <ul style="list-style-type: none"> • Allow municipalities to continue to rely on forecasts previously issued by the Province for the purpose of land use planning, while ensuring projected needs as per Policy 2.1.3 which may extend beyond the specified time horizon. Modify Policy 2.1.2 so that it reads: “Notwithstanding policy 2.1.1, municipalities may continue to forecast growth

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	possible to rely on the Growth Plan 2020 forecast until 2031 without modification.	using population and employment forecasts previously issued by the Province and may extend those forecasts and their horizon years for the purposes of the policies of this Chapter.”
<p>2.1.3</p> <p>Policy related to planning for projected growth</p>	<ul style="list-style-type: none"> • Policy provides for planning for a time horizon of at least 20 years, but not more than 30 years. • Policy that states that when a Minister's Zoning Order (MZO) has been issued, the resulting development potential will be in addition to projected needs over the planning horizon and that municipalities are required to incorporate the additional growth when updating their official plan and infrastructure plans. • It is not necessarily true that the entirety of Ministerially zoned potential exceeds the existing zoned potential. There may be unused potential under the existing zoning prior to the order. • This policy may lead municipalities to set aside more land than is needed for population growth, which may result in planning for too little land for employment growth. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Modify the second part of the policy so that it reads: “Where the Minister of Municipal Affairs and Housing has made a zoning order, the municipality shall assess the amount of zoned potential that exceeds the existing potential in the affected area and add the difference to the projected needs over the planning horizon. At the time of the municipality’s next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.”
<p>2.1.4</p> <p>Policy related to the amount of land that needs to be designated and fully serviced for growth</p>	<ul style="list-style-type: none"> • Removes references to “residential intensification and redevelopment” and introduces ambiguity as to whether “lands which are designated and available for residential development” include underutilized infill sites that have the potential to accommodate 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain references to “residential intensification and redevelopment” to provide clarity that where sufficient land and servicing

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	<p>significant portions of forecasted growth.</p>	<p>exists to accommodate forecast population through infill development.</p> <ul style="list-style-type: none"> Clarify that municipalities are not themselves expected to provide land with servicing capacity but can leverage policy / legislative tools to make servicing infrastructure available by others (e.g., developers).
<p>2.1.6</p> <p>Policy related to achieving the goal of building complete communities</p>	<ul style="list-style-type: none"> Removing references to climate change, green infrastructure, compact built form, transit supportive development, and affordable housing may hinder a planning authority's ability to ensure these matters are considered when planning for complete communities. Removes references to the “convenient access to” amenities and services (i.e., public service facilities, local stores, etc.). Convenient access to a wide range of amenities and services is a core principle of a complete community. Changing the policy from “will support” to “should support” may allow for outcomes that counter the goal of achieving complete communities lowering the bar for the development of complete communities. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain references to climate change, green infrastructure, compact built form, transit supportive development, affordable housing, safety, and convenient access to a range of amenities and services. Maintain the policy language of “will/shall support”.
<p>2.2</p>	<p>Housing</p>	
<p>2.2.1</p> <p>Policy related to how municipalities must accommodate a</p>	<ul style="list-style-type: none"> Support the reference to low and moderate-income households in the definition of affordable housing as it provides municipalities with a basis and rationale to develop land use planning policies that better respond to the housing affordability 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Amend proposed policy 2.2.1.b.2, related to the redevelopment of existing

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range and mix of housing options	<p>needs of residents as these were tied to household incomes.</p> <ul style="list-style-type: none"> • Removing the direction for the “development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available” may restrict the policy rationale in securing development-related funding for growth-related projects such as new community recreation centres or new parkland. • Removing the reference to municipalities requiring that multi-unit developments incorporate a mix of unit sizes to accommodate a diverse range of housing incomes may limit the development of complete communities with options for larger households, including families with children, particularly in large and fast-growing municipalities where multi-unit developments make up a large proportion of residential developments. • Permitting and facilitating the redevelopment of existing commercial and institutional sites for residential use may make it harder to plan for complete communities, as it may result in the loss of retail, office, and institutional uses without replacement of these amenities. These uses are needed to support future population growth. • Redevelopment of existing commercial sites for residential use can cause long-term economic implications for job growth and erode employment lands and the property tax base, especially those primarily comprised of office uses. 	<p>commercial and institutional sites, to enable municipalities to include a requirement to maintain or replace commercial space within the redevelopment or within an off-site location.</p> <ul style="list-style-type: none"> • Enact a Regulation to permit the use of zoning with conditions, pursuant to Section 113 of the City of Toronto Act 2006, that would enable a municipality to secure replacement employment space as part of redevelopments proposing to convert existing commercial and institutional space. • Maintain policy direction for municipalities to direct new housing towards locations where appropriate levels of infrastructure and public service facilities are or planned for (PPS 2.2.1(c)). • Maintain Growth Plan policy 2.2.6.3 that provides direction to municipalities to use available tools to require that multi-unit residential developments incorporate a mix of unit types to accommodate a diverse range of households sizes and incomes.

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	<ul style="list-style-type: none"> Specifically referencing shopping malls and plazas as potential areas for residential intensification will likely result in significant redevelopment pressures on existing employment lands with these types of uses. These types of employment lands typical act a buffer between sensitive land uses and heavy employment uses. 	
2.3	Settlement Areas and Settlement Area Boundary Expansions	
<p>2.3.1.1</p> <p>Policy related to growth being focused in settlement areas and strategic growth areas</p>	<ul style="list-style-type: none"> Policy direction for Strategic Growth Areas omits reference to general intensification of areas outside of Strategic Growth Areas, limiting opportunities to encourage the development of housing in areas that can accommodate new housing options. Policies should require the coordination of development with the delivery of infrastructure to ensure municipalities can proactively and strategically plan infrastructure in a financially responsible manner. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Add a policy that encourages the development of missing middle type housing in areas outside of Strategic Growth Areas.
<p>2.3.1.2</p> <p>Policy related to how land-use patterns should be coordinated within settlement areas</p>	<ul style="list-style-type: none"> Changing policy 2.3.1.2 from “shall” to “should” significantly weakens the policy and reduces the prospect of the policy having a meaningful impact, including ensuring that land use patterns are based on densities and a mix of land uses which use land resources efficiently, optimizing existing hard and soft infrastructure, supporting active transportation, and supporting public transit systems. Removing policies that tie land use decisions to minimizing the negative impacts of air quality and 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain policies that direct municipalities to avoid uneconomical expansion of infrastructure. (PPS 1.1.3.2 (b)) Maintain policies that direct municipalities to account for climate change planning and mitigation, air quality and energy efficiency. (PPS 1.1.3.2 (c) & (d))

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	<p>climate change, and encouraging energy efficiency, weakens the policy rationale for the City's environmental policies such as TransformTO.</p>	
<p>2.3.1.4</p> <p>Policy related to establishing density targets for designated growth areas</p>	<ul style="list-style-type: none"> Policy change removes requirement for large municipalities (i.e., York Region, Peel Region, Durham Region, etc.) in the Greater Golden Horseshoe to accommodate 50% of residential intensification within their delineated built-up areas. This will potentially result in less efficient land use patterns leading to a loss in permeable lands, natural spaces, and agricultural lands. This will impact Toronto as a community downstream (i.e., greater risk of flooding). 	<p>Do Not Support</p> <p>If approved, recommend revisions:</p> <ul style="list-style-type: none"> Require that large and fast-growing municipalities accommodate the at least 50% of residential development within their current built-up areas.
<p>2.3.1.5</p> <p>Policy related to establishing density targets for new or expanded settlement areas</p>	<ul style="list-style-type: none"> The policy change removes the requirement for select municipalities to set density targets for greenfield development. While Toronto does not have land available for greenfield development the upper-tier and lower-tier municipalities surrounding Toronto are likely to be impacted by these policy changes. Over time it can be anticipated that these policies will result in more greenfield development than would otherwise happen if the policies in the current Provincial Policy Statement and Growth Plan were maintained. As result, there is a risk that Toronto could be exposed to greater environmental risks (i.e., flooding) due to the downstream effects of the loss of permeable 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Direct that large and fast-growing municipalities must achieve a minimum density target of 50 residents and jobs combined per hectare for new settlement areas or settlement area expansion lands.

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	surfaces, natural spaces and agricultural lands.	
<p>2.3.2.1</p> <p>Policy related to when to allow new or expanded settlement area boundaries</p>	<ul style="list-style-type: none"> • Policy changes reduce the role of intensification and increase the opportunity for urban expansion to accommodate residential growth. • While Toronto does not have the ability to expand its settlement boundary, the upper-tier and lower-tier municipalities surrounding Toronto are likely to be impacted by these policy changes. • Over time it can be anticipated that these policies will result in more urban boundary expansions than would otherwise happen if the policies in the current Provincial Policy Statement and Growth Plan were maintained. As result, there is a risk that Toronto could be exposed to greater environmental risks (i.e., flooding) due to the downstream effects of the loss of permeable surfaces, natural spaces and agricultural lands. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain that municipalities may identify a settlement area or allow the expansions of a settlement area boundary only at the time of a 5-year official plan update and only where it has been demonstrated that certain conditions have been met (PPS 1.1.3.8).
<p>2.4</p>	<p>Strategic Growth Areas</p>	
<p>2.4.1.2</p> <p>Policy related to the planning of strategic growth areas</p>	<ul style="list-style-type: none"> • Would maintain Strategic Growth Areas as an important element of a municipality’s urban structure that are planned to accommodate significant population and job growth, and support affordable housing. • Would remove the need to set minimum density targets for each strategic growth area. • Would remove the concept and related policies to Urban Growth Centres (UGCs) • The City of Toronto’s Secondary Plans that correspond to the UGCs in the Growth Plan for the Greater 	<p>Support in Principle</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Clarify that Strategic Growth Areas include Urban Growth Centres as defined by former Provincial Plans. • The policy should contain language that emphasizes the importance of maintaining Urban Growth Centres as focal points for significant population and employment growth and that any changes to the size and

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	<p>Golden Horseshoe and each explicitly identify the Secondary Plan area as an UGC as required for Growth Plan conformity.</p> <ul style="list-style-type: none"> Removing all Growth Plan policies for Urban Growth Centres (UGC) may diminish their ability to: (1) serve as centres for investments in regional public service facilities, as well as commercial, recreational, cultural, and entertainment uses, (2) accommodate and support the transit network at a regional scale, (3) serve as a high-density major employment centres that will attract provincially, nationally, or internationally significant employment uses, and (4) accommodate significant population and employment growth. 	<p>location of does not diminish this objective.</p> <ul style="list-style-type: none"> Modify policy (b) so that is reads: “as focal areas for investment in public service facilities, as well as, commercial, recreational, entertainment, and cultural uses;”
<p>2.4.2.1</p> <p>Policy related to identifying and delineating Major Transit Station Areas</p>	<ul style="list-style-type: none"> Existing Major Transit Station Areas (MTSA) are unlikely to be affected by the MTSA policy change. The City may need to include 70 new MTSA based on the definition of “higher order transit” corridors. 	<p>Support in Principle</p>
<p>2.4.2.2</p> <p>Policy related to density targets for the types of Major Transit Station Areas</p>	<ul style="list-style-type: none"> No change to density targets for MTSA. 	<p>Support</p>
<p>2.4.2.4</p> <p>Policy related to requests for alternative targets for Major</p>	<ul style="list-style-type: none"> Municipalities are still allowed to request a lower density target where it has been demonstrated as necessary based on the two conditions being met. 	<p>Support</p>

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Transit Station Areas		
2.4.2.5 Policy related to identifying MTSA not on a higher order transit corridor	<ul style="list-style-type: none"> Provides the flexibility for municipalities to identify MTSAs along transit corridors that do not meet the definition of higher order transit. 	Support
2.4.2.6 Policy related to how Major Transit Station Areas should be planned and designed	<ul style="list-style-type: none"> Policy direction with respect to planning for MTSAs is weakened, which could reduce their transit supportiveness and negatively impact the building of complete communities in areas adjacent to MTSAs and along higher order transit corridors. Further, policy changes may result in developments that have land uses and built forms that could adversely impact the achievement of transit-support densities. 	Do Not Support If approved, recommended revisions: <ul style="list-style-type: none"> Maintain the Growth Plan policies that support the development of complete communities with a compact built form and affordable housing within MTSAs, on lands adjacent to MTSAs, and along transit corridors (Growth Plan 2.2.4.8 - 2.2.4.10). Include reference to affordable housing given direction to include affordable housing in Protect Transit Station Areas through Inclusionary Zoning.
2.4.3.1 Policy related planning for intensification on lands adjacent to frequent transit corridors	<ul style="list-style-type: none"> Policy provides stronger direction to intensify lands adjacent to planned or existing frequent transit corridors. Policy assigns with Official Plan policies that support intensification along these corridors, such as Avenues. The appropriateness of intensification depends on much more than frequent public transit service but also the availability of community and social services and 	Support in Principle If approved, recommended revisions: <ul style="list-style-type: none"> Include reference to “transit supportive” in the policy to provide greater direction around the type of intensification desired along frequent transit corridors. Align policy with definition of Strategic Growth Areas.

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	<p>facilities, land use mix and compatibility.</p> <ul style="list-style-type: none"> The policy language differs from the wording in the definition of Strategic Growth Areas and creates confusion as to its intent and relationship to Strategic Growth Areas. Specifically, while the policy directs that intensification is to be directed to “lands that are adjacent to existing and planned frequent transit corridors”, the definition of Strategic Growth Areas appears to provide a different interpretation of the lands that this policy would apply to. The definition speaks to “lands along major roads, arterials, or other areas with existing or planned frequent transit service” being a type of Strategic Growth Area in addition to “<i>higher order transit corridor</i>”. 	
2.8	Employment	
<p>2.8.1.1</p> <p>Policy related to promoting economic development and competitiveness</p>	<ul style="list-style-type: none"> Policy change may allow for a broader mix of employment uses within mixed use areas and a broader mix of non-employment uses within employment lands. The policy change may undermine planning for economic development by removing the requirement to consider infrastructure availability. Policy change may decrease the City’s ability to regulate separation of industrial and manufacturing uses intended to be located in Employment Areas from the permitted land uses intended to be located on the lands surrounding them. As well, reference to appropriate transition is unclear 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Revise to include all the considerations listed in PPS 1.3.1. and 1.7.1., as well as Growth Plan Policy 2.2.5.1, in particular: PPS 1.3.1.e PPS 1.7.1.c PPS 1.7.1.g PPS 1.7.1.h PPS 1.7.1.e Growth Plan 2.2.5.1.b.

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	<p>with regard to regulating land use through zoning.</p> <ul style="list-style-type: none"> • Policy change may result in the loss of built heritage resources and cultural heritage landscapes. 	
<p>2.8.1.2</p> <p>Policy related to the location of employment uses next to sensitive land uses</p>	<ul style="list-style-type: none"> • Policy change may result in more industrial, manufacturing, and small-scale warehousing uses (that meets the no adverse effects test) to locate adjacent to sensitive land uses in strategic growth areas and mixed-use areas with frequent transit. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change policy to read: “Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of Employment Areas, by prohibiting residential uses in appropriate locations.”
<p>2.8.1.3</p> <p>Policy related to how lands for employment outside of employment lands will be used</p>	<ul style="list-style-type: none"> • Policy change is likely to result in the encroachment of residential, institutional, and public service facilities uses on lands for employment outside of <i>Employment Areas</i>, such as office parks and those lands that are no longer deemed <i>Employment Areas</i>. This may result in a net loss of jobs as employment uses are converted to residential uses and limit the City’s ability to provide a buffer around <i>Core Employment Areas</i> to allow for a transition of uses. • Further, policy 3.5.1 states that where avoidance is not possible, minimization and mitigation will take place. Allowing for sensitive land uses on “lands that provide for 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Revert to the previous wording in the PPS 2023 and include a second part to the policy by changing the policy to read: “On lands for employment outside of employment areas, and taking into account the transition of uses to prevent adverse effects, a diverse mix of land uses, including residential, employment, public service facilities and other institutional uses shall be

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	<p>an appropriate transition of uses to prevent adverse effects” may result in more instances where avoidance is not possible and mitigation/minimization may be insufficient to appropriately protect residents from adverse effects.</p> <ul style="list-style-type: none"> • Provincial Guidelines, such as the D-6 guidelines, are not policy. As such, these tools are likely insufficient to ensure sensitive land uses are not adversely affected by certain types of employment uses (i.e., Major Facilities) when this policy explicitly permits uses, such as residential, in lands that are intended to provide a transition (i.e., buffer) to prevent adverse effects. 	<p>permitted, to support the achievement of complete communities.</p> <p>On lands for employment outside of Employment Areas, uses that would have adverse effects if located in proximity to Employment Areas or major facilities shall be prohibited.”</p>
<p>2.8.1.4</p> <p>Policy related to location of major office and institutional developments</p>	<ul style="list-style-type: none"> • Policy change may lead some major offices and major institutional developments to occur outside of strategic growth areas. 	<p>Support in Principle</p>
<p>2.8.2.1</p> <p>Policy related to planning, protecting, and preserving employment areas</p>	<ul style="list-style-type: none"> • PPS 2024 deletes the concept of Provincially Significant Employment Zones. Toronto has 11 PSEZs either partially or entirely within its borders. These sites are key strategic employment sites that are sensitive to encroachment from incompatible uses. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Strengthen land use policy protections for all Employment Areas to ensure that these lands support the economy and are viable over the long-term.
<p>2.8.2.2</p> <p>Policy related to the protection of employment</p>	<ul style="list-style-type: none"> • Removing “plan for” and “preserve” may open the door to the conversion of some of the employment lands nearby major 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p>

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<p>areas located next to major goods movement facilities and corridors</p>	<p>goods movement facilities and corridors.</p>	<ul style="list-style-type: none"> Modify policy so that it reads: “Planning authorities shall plan for, protect and preserve employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.”
<p>2.8.2.3 Policy related to protection of <i>Employment Areas</i></p>	<ul style="list-style-type: none"> Policy change includes new limitations on what can be located within <i>Employment Areas</i>: public service facilities, other institutional uses, commercial uses, and retail/office uses not associated with the primary employment use. Excluding standalone office uses and major office uses excludes office parks from being designated <i>Employment Areas</i>. This exposes some <i>Core and General Employment Areas</i> to encroachment from sensitive uses. Will likely result in the destabilization of Areas of Employment. Prohibiting commercial uses, public service facilities and other institutional uses in <i>Employment Areas</i> will reduce the number of places these uses can locate in Toronto. These uses would need to compete against residential uses in a highly land speculative market. Comprehensive planning and protection of employment lands for a variety of sectors on a city-wide scale aligned with municipal investment in water and wastewater infrastructure, transit, 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Modify policy (and employment area definition) to explicitly include all types of office, retail, and service uses. Change policy (e) to read: “including an appropriate transition to adjacent non-Employment Areas to ensure land use compatibility and to maintain the long-term economic viability of the planned uses and function of these areas.”

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	<p>and economic development initiatives is key in supporting job growth and attracting and retaining businesses to the City's employment lands.</p>	
<p>2.8.2.4</p> <p>Policy related to updating Official Plans to appropriately identify <i>Employment Areas</i></p>	<ul style="list-style-type: none"> • This policy makes no reference to the timing of when planning authorities should assess and update <i>Employment Areas</i> identified in official plans. By removing this critical timing policy, municipalities may face pressure to reconsider these designations repeatedly and at site-by-site requests, which leads to poor planning outcomes, and land use uncertainty for landowners and business operators in <i>Employment Areas</i>. • This policy and policy 3.5.1 place the onus of land use compatibility on the employment areas, and would (1) reduce the range of permitted uses in locations within the employment areas in proximity to sensitive uses, and (2) reduce the land inventory available for more impactful uses that are to be permitted only within employment areas. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change policy to read: “At the time of the official plan review or update, planning authorities shall assess and update <i>Employment Areas</i> identified in official plans to ensure that this designation is appropriate to the planned function of <i>Employment Areas</i>. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5.1 to maintain the long-term operational and economic viability of the planned uses and function of these areas.”
<p>2.8.2.5</p> <p>Policy related to conditions when municipalities may grant the removal of lands from <i>Employment Areas</i></p>	<ul style="list-style-type: none"> • Policy eliminates the role of a comprehensive review when considering conversions of <i>Employment Areas</i>, a critical method of providing land use certainty, ensuring careful and comprehensive consideration of these requests and ensuring long-term stability and availability of employment lands. Municipalities will face ongoing, site-by-site requests, which does not allow for comprehensive analysis and 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain that a conversion or removal of employment area lands can only be considered when a municipality is undertaking their 5-year Official Plan review. Change policy to read: “Planning authorities may remove lands from

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	<p>planning considerations. In addition, this will lead to increased land use uncertainty for business operations and growth, increased land speculation (since essentially all lands could be proposed for conversion) and significantly impact the integrity of large <i>Employment Areas</i>.</p> <ul style="list-style-type: none"> • Private requests to remove lands from <i>Employment Areas</i> would be subject to Bill 23’s 180-day review timeline. This timeline will be challenging to meet as the issues that need to be addressed are complex and require detailed study (e.g., land use compatibility study). • It is unclear what “employment lands” refer to in policy (d). As the policy relates to the removal of lands from employment areas the policy should clarify that this test should be determined by whether municipalities have sufficient lands within employment areas to accommodate projected employment growth to the horizon of their official plan. 	<p>employment areas at the time of the official plan review or update only where it has been demonstrated that:”</p> <ul style="list-style-type: none"> • Change policy (d) to read: “the municipality has sufficient lands within <i>employment areas</i> to accommodate projected employment growth to the horizon of the approved official plan.”
2.9	Energy Conservation, Air Quality and Climate Change	
<p>2.9.1</p> <p>Policy related to reducing greenhouse gas emissions and preparing for the impacts of climate change</p>	<ul style="list-style-type: none"> • Policy weakens direction regarding adequately addressing climate change adaptation and green houses gas emissions goals. Changes reduce the role of land use and development patterns to support energy conservation, improve air quality, reduce greenhouse gas emissions, and prepare for the impacts of a changing climate. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain the current Provincial Policy Statement and Growth Plan policies: <ul style="list-style-type: none"> • PPS policy 1.8.1 (d), (f), and (g) • Growth Plan policy 4.2.10.1 (a), (b) and (c) • Growth Plan policy 4.2.10.2 (b) and (c)

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3.1	General Policies for Infrastructure and Public Service Facilities	
<p>3.1.1</p> <p>Policy providing general direction on planning infrastructure and public service facilities</p>	<ul style="list-style-type: none"> • The proposed language does not address infrastructure resilience, climate change considerations, and infrastructure capacity when planning for infrastructure and public service facilities. There is less guidance for municipalities. • The removal of more detailed Growth Plan policies speaking to coordinated investment in infrastructure and public service facilities, and the removal of language speaking to climate change considerations in planning these elements may require a re-evaluation of the municipal policy framework protecting parklands and may compromise the ability to secure growth-related infrastructure and facilities as a condition of development. • The proposed policy also removes reference to the Province supporting planning for infrastructure and public service facilities. • Requirements to ensure viability of infrastructure over its lifecycle in 3.1(1)a is critical and needs to remain clearly called out. • Deleted PPS Policy 1.6.2 which directed municipalities to promote green infrastructure to complement infrastructure. • Infrastructure takes time to plan and build, it is recommended that the PPS direct proponents to develop in areas with servicing or servicing is planned, whenever possible, as outlined in the municipality’s long term servicing plans and capital plans. Private servicing should be a last resort, 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Retain the policies from the Growth Plan (3.2.1.2 (b) – (d)). • Provide additional policy direction on how municipalities are expected to “leverage the capacity of development proponents”. • Maintain policy reference to green infrastructure. • Introduce new language that emphasises the important of ongoing state-of-good repair for infrastructure.

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	subject to adequate tests with adequate measures to address potential liability.	
<p>3.1.3</p> <p>Policy providing direction on locating new infrastructure and public service facilities to support emergency management services</p>	<ul style="list-style-type: none"> The proposed changes in various sections (1.1.1 (c), 1.1.3.4, 1.4.3 (f), and Vision) setting out that safety only needs to be "mitigated" may result in the design of development-provided infrastructure not requiring adherence to public safety, except to provide emergency vehicle access. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Amend 3.1.4 to ensure the protection of public health and safety as its own requirement, irrespective of Section 3 which only addresses hazards. Change policy to read: "3.1.4 Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services; and to ensure the protection of public health and safety in accordance with the policies in Section 3.0: Protecting Public Health and Safety."
<p>3.1.4</p> <p>Policy related to how public service facilities should be planned</p>	<ul style="list-style-type: none"> Public service facilities include a diverse range of programs, facility types and service models. Co-location is not feasible for all planned or existing public service facilities. Implementation of the policy may not be feasible in many cases. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Modify policy so that it reads: "<i>Public service facilities</i> are encouraged to be planned and co-located with one another, along with parks and open space where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and <i>active transportation</i>."

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3.2	Transportation Systems	
3.2.1 Policy providing general principles for transportation systems	<ul style="list-style-type: none"> Policy changes may limit opportunities to coordinate land use and transportation planning, reduce reliance on automobile or reduce emission of greenhouse gases and plan for multi-modal transportation. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Modify policy to read: “<i>Transportation systems</i> should be provided which are safe, space and energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support walking, cycling, public transit and the use of zero- and low- emission vehicles.”
3.2.2 Policy related to transportation system efficiency	<ul style="list-style-type: none"> Changed policy so Transportation Demand Management (TDM) is only required ‘where feasible’. Growth Plan TDM goals have been removed. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain Growth Plan policy 3.2.2.4.
3.2.3 Policy related to connectivity between transportation systems/modes	<ul style="list-style-type: none"> Removes prioritization of non-auto modes, as well as integration with land-use planning. Removes requiring efficient land use patterns, density, and mix of uses along with the objective of minimizing trip lengths and vehicle trips. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Modify policy to read “As part of a <i>multimodal</i> transportation system, connectivity within and among <i>transportation systems</i> and modes should prioritize non-auto modes, be integrated with efficient land use and density, and reduce vehicle trips. A <i>multimodal</i> transportation system should be planned for, maintained and, where possible, improved including

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		connections which cross jurisdictional boundaries.”
3.3	Transportation and Infrastructure Corridors	
3.3.2 Policy related to protecting major goods movement facilities and corridors	<ul style="list-style-type: none"> Minor changes. Removes reference to coordination with municipalities in Growth Plan. 	Support in Principle
3.3.3 Policy related to development in and adjacent to planned corridors	<ul style="list-style-type: none"> Minor changes. Prioritizes corridor protection over the land use designations along transportation corridors. Gives stronger policy support for City to refuse applications that may not be compatible with planned corridors. 	Support in Principle
3.3.4 Policy related to abandoned corridors	<ul style="list-style-type: none"> Minor changes. Preserves and reuses abandoned corridors. Supports the future use of currently abandoned corridors to potentially improve the transportation system which aligns with Official Plan policies. 	Support in Principle
3.3.5 Policy related to co-locating linear infrastructure	<ul style="list-style-type: none"> Removes policy direction for how municipalities are to plan for linear infrastructure and corridors. 	Support in Principle If approved, recommended revisions: <ul style="list-style-type: none"> Maintain Growth Plan policy 3.2.5.1 (d).
3.4	Airports, Rail and Marine Facilities	
3.4.2 Policy related to the protection of Airports from	<ul style="list-style-type: none"> Policy strengthened so that municipalities, when planning to protect airports from incompatible land uses and development, may now prohibit (instead of 	Support

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incompatible land uses and development	“discourage”) land uses which may cause a potential aviation safety hazard.	
3.5	Land Use Compatibility	
3.5.1 Policy related to planning major facilities and sensitive land uses	<ul style="list-style-type: none"> • Appears to be a policy conflict with the employment policies. The <i>Employment Area</i> policies in the proposed Provincial Planning Statement would allow for sensitive land uses (i.e., residential) in all lands for employment outside of <i>Employment Areas</i>, regardless of whether or not adverse effects can be minimized and mitigated as required by the land use compatibility policies. The determination of compatibility should occur before the permission for sensitive land uses are put in place. • Policies do not identify major retail and major offices as uses that could have adverse effects on existing or planned industrial, manufacturing or other major facilities. This exclusion will eliminate considerations of the adverse effects of these uses, which often have high public access needs (high traffic, potential pedestrian traffic, etc.). • The land use compatibility policies have also removed some of the detailed considerations that municipalities should make when reviewing development applications with adverse impacts on Employment Areas, such as identifying alternative locations for the proposed sensitive land use. • The criteria around identifying alternative locations has helped the City with evaluating whether there 	<p>Do Not Support (More Information Needed)</p> <p>If approved, recommend revisions:</p> <ul style="list-style-type: none"> • Require that municipalities determine that sensitive land uses proposed near manufacturing, warehousing and other major facilities are compatible or can be made compatible prior to permitting the sensitive land use. • Maintain the Growth Plan policy (2.2.5.8) which requires that the development of sensitive land uses, major retail and major office will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other major facilities.
3.5.2 Policy related to protecting industrial, manufacturing, or other major facilities from sensitive land uses		

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	<p>is a real 'need' for the conversion, with evidence that there are no other available locations.</p>	
<p>3.6</p>	<p>Sewage, Water, and Stormwater</p>	
<p>3.6.1</p> <p>Policy related to planning for sewage and water services</p>	<ul style="list-style-type: none"> • Policy no longer addresses comprehensive water or wastewater master planning and adapting/revising municipal stormwater infrastructure to address climate change. Sewage, water and stormwater should be managed with climate change impacts in mind. • Includes new direction that when municipalities are planning for sewage and water services they accommodate forecasted growth in a “timely” manner. Further, new direction is provide that municipalities consider opportunities to allocate and re-allocate unused system capacity to meet current and projected needs for increased housing supply. This change reflects legislative changes proposed through Bill 185 that permits municipalities to enact a by-law that would allow for the re-allocation of system capacity for approved developments under certain conditions. • Toronto Water undertakes comprehensive modelling of the water supply and sewer systems to ascertain capacity conditions. There are numerous capital projects in the 10-year capital plan that have a servicing growth component. These projects are undertaken within the context of a 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain PPS policy 1.6.6.1 (b) 2. • Maintain Growth Plan policy 3.2.6.2.1, 3.2.6.2 (a) and (c).

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	<p>built city, competing for construction space with many city building initiatives such as transit expansion.</p>	
<p>3.6.2</p> <p>Policy related to identifying preferred sewage and water services for settlement areas</p>	<ul style="list-style-type: none"> • Policy removes direction to optimize municipal sewage and water services through intensification and redevelopment. • Unclear what “centralized servicing systems” and “decentralized servicing systems” are. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change policy to read: Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems. • Clarify in the definition section what “centralized servicing systems” and “decentralized servicing systems” are.
<p>3.6.7</p> <p>Policy related to allowing lot creation where there is sufficient</p>	<ul style="list-style-type: none"> • Policy removes consideration of sufficient reserve sewage system capacity by reviewing capacity for hauled sewage from private communal sewage services and individual on-site sewage services 	<p>Support in Principle</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change policy to read: “Planning authorities may allow lot creation only if

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sewage and water system capacity	when deciding whether to approve lot creation.	where there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity. The determination of sufficient reserve sewage system capacity shall include treatment capacity for hauled sewage from private communal sewage services and individual on-site sewage services.”
3.6.8 Policy related to planning for stormwater management	<ul style="list-style-type: none"> • Policy no longer addresses adapting/revising municipal stormwater infrastructure to address climate change and removes direction for stormwater management planning to inform proposals for large-scale developments. • Policy provides new direction to “reduce increases in storm water volumes and contaminant loads”. It is unclear what the impact of this change may, however, there could be impact to Wet Weather Flow requirements applied to new developments. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain Growth Plan policy 3.2.7.2. • Change policy (c) to read: “minimize erosion and changes in water balance, and prepare for the impacts of changing climate through the effective management of stormwater, including through the use of green infrastructure;”
3.7	Waste Management	
3.7.1 Policy related to planning and providing for a waste management system	<ul style="list-style-type: none"> • The proposed Provincial Planning Statement omits a more thorough explanation of what is meant by integrated waste management. This risks a narrow interpretation of the term that is more focussed on downstream waste management strategies. This is contrary and not supportive of Toronto’s aspiration to move towards a more circular economy, and it’s proposed circular economy goals to: 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change the definition of "waste management system" to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province’s circular economy ambitions and hierarchies

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	<ul style="list-style-type: none"> ○ Reduce overall material consumption ○ Sustain a robust ecosystem of reuse, repair, donation ○ Minimize waste generation ○ Stimulate a thriving market for secondary materials ● Additionally, this change is seemingly inconsistent with the Provincial Interest expressed in the Resource Recovery and Circular Economy Act, including fostering the continued growth and development of the circular economy, and increasing the reuse and recycling of waste across all sectors of the economy. In particular, the lack of definition for integrated waste management system means that the proposed policy statement is devoid of reference to resource recovery, which could be interpreted as allowing planners to put disposal (e.g., landfilling) on par with any efforts toward resource recovery. This is inconsistent with the objectives of most municipalities in Ontario and a departure from the RRCEA. ● This revision is also inconsistent with direction provided in the Food and Organic Waste Policy Statement (FOWPS) established under the RRCEA. Provincial direction in the FOWPS is directed to entities including municipalities and provincial ministries to meet targets for the reduction and recovery of food waste and facilitate the planning and siting of processing facilities. ● The revision further removes references to the need to design and locate waste management 	<p>referenced in the Strategy for a Waste Free Ontario and Food and Organic Waste Policy Statement.</p> <ul style="list-style-type: none"> ● Align the Waste Management policies with the language of the Resource Recovery and Circulate Economy Act (RRCEA) and provide guidance on how municipalities are to interpret the Waste Management policies in the Provincial Planning Statement alongside the RRCEA, its related regulations and the Food and Organic Waste Policy Statement. ● Include policy direction that requires municipalities to coordinate and plan for appropriate and adequate shared waste management infrastructure. ● Include policy direction that ensures the provision of lands for integrated waste management, including recycling and processing facilities, and residual disposal/management. The policy direction should consider language that facilitates siting new capacity or re-designating neighbouring land uses, promoting compatibility, preventing encroachment and mitigating adverse effects to ensure that existing and planned waste processing facilities can contribute to building a circular economy in

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	<p>systems in accordance with provincial legislation and standards. For greater clarity, this language should be retained in the policy.</p> <ul style="list-style-type: none"> • Removal of the Growth Plan policies to consider waste management initiatives within the context of long-term regional planning, and in collaboration with neighbouring municipalities, risks a loss of efficiency and effectiveness in Ontario's planning context for sustainable waste management. 	<p>Ontario. This is of particular importance with the limited landfill capacity available across the province, by most estimates to reach capacity in the next 10 years.</p>
3.8	Energy Supply	
<p>3.8.1</p> <p>Policy related to planning for energy systems</p>	<ul style="list-style-type: none"> • Removed policy direction for the energy conversation for existing buildings and planned developments. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain Growth Plan policy 4.2.9.1 (b). • Add new policy 3.8.2: Planning for energy distribution shall: <ul style="list-style-type: none"> a) prepare for the impact of a changing climate; and b) accommodate climate-focused behaviour changes that will increase electricity demand, such as EV adoption or electric HVAC systems.
3.9	Public Spaces, Recreation, Parks, Trails, and Open Space	
<p>3.9.1</p> <p>Policy related to planning and providing for public spaces,</p>	<ul style="list-style-type: none"> • The removal of the more detailed Growth Plan policies (2.2.1.4(d), 3.2.2.3, 4.2.5.1, and 4.2.5.2) may require a re-evaluation of existing municipal policies which utilize these policies as a foundation. 	<p>Partially Support</p> <p>If approved, recommended revision:</p> <ul style="list-style-type: none"> • Maintain Growth Plan policy 2.2.1.4 (d) (iii) an (iv).

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recreation, parks, trails, and open space	<ul style="list-style-type: none"> • This policy introduces the idea that public spaces should be inclusive but de-emphasizes the need for them to be equitably distributed geographically across a municipality. • Narrowing the meaning of healthy, active and inclusive communities by omitting mention of access to healthy, local, and affordable food options does not support Toronto’s proposed circular economy goal of promoting healthy and culturally appropriate food for all, sourced as locally as possible. 	<ul style="list-style-type: none"> • Change policy (b) to read: “planning and providing for the needs of persons of all ages and abilities in the equitable distribution of a full range of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources.”
4.1	Natural Heritage	
<p>4.1.3</p> <p>Policy directing the identification of natural heritage systems in southern and eastern Ontario</p>	<ul style="list-style-type: none"> • The draft PPS 2024 policies match the PPS 2020, but differs from Growth Plan. • The Growth Plan’s Natural Heritage System (NHS) policies were not carried into the draft PPS 2024. These included consideration for ecological connectivity and enhanced protection for the NHS and key natural heritage and hydrologic features outside of settlement area boundaries of the GGH. • While these Growth Plan policies did not apply within the City of Toronto, Toronto is functionally connected to the Growth Plan’s NHS as a downstream community. The proposed deletion of the Growth Plan’s NHS policies will impact land use patterns upstream from Toronto, which may influence the City’s overall ecological health and resilience. Within this rapidly urbanizing region, it is vital to maintain policies that promote 	<p>Partially Support</p> <ul style="list-style-type: none"> • Maintain the Natural Heritage System policies of the Growth Plan (4.2.2, 4.2.3, 4.2.4) for the mapped Natural Heritage System for the Growth Plan

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	natural connectivity and limit the conversion of land from pervious to urban and impervious.	
4.2	Water	
<p>4.2.1</p> <p>Policy related to protecting or improving the quality and quantity of water</p>	<ul style="list-style-type: none"> Removed policy direction that planning authorities should evaluate and prepare for the impacts of a changing climate to water resource systems at the watershed level. Removed policy direction to increase the extent of vegetative and pervious surfaces as a stormwater management practice. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain policy references to “key hydrologic features, key hydrologic areas and their functions” from PPS 2.2.1 (e). Maintain PPS policy 2.2.1 (c) and (i). Maintain Growth Plan policy 4.2.1.2.
<p>4.2.3</p> <p>Policy related to undertaking watershed planning</p>	<ul style="list-style-type: none"> Introduced requirement for “large and fast-growing municipalities” to undertake watershed planning. Still no requirement that sub watershed planning is to be utilized to inform planning for large-scale development in greenfield areas for Growth Plan municipalities. This is an important consideration in land use planning decisions in order to understand the local and downstream impacts of new, greenfield and other large-scale development 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Include policies from the Growth Plan (3.2.7.2, 4.2.1) to require subwatershed plans to inform large-scale development and secondary plans should be included in the new Provincial Planning Statement.
<p>4.2.4</p> <p>Policy related to the responsibility of upper-tier municipalities to work with lower-tier municipalities on</p>	<ul style="list-style-type: none"> New policy requires Upper Tier municipalities with a one or more “large and fast growing” municipality to undertake watershed planning in partnership with the lower tier municipalities. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain Growth Plan policy 4.2.1.1 to require watershed planning is completed in partnership with relevant Conservation Authorities

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watershed planning		
4.2.5 Policy related to municipalities collaboration with conservation authorities on watershed planning	<ul style="list-style-type: none"> • New policy encourages that watershed planning is done in collaboration with Conservation Authorities. • Conservation Authorities have expertise in watershed planning and their involvement in watershed planning has been instrumental in Toronto's context. It is key that this policy ensures they are engaged as partner in the development of watershed planning to ensure cross-jurisdictional perspective and a true watershed perspective. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain Growth Plan policy 4.2.1.4. to require watershed planning is completed in partnership with relevant Conservation Authorities.
4.3.1	General Policies for Agriculture	
4.3.1.1 Policy related to encouraging support for agricultural system	<ul style="list-style-type: none"> • Removed Provincially identified Agricultural System and associated policies. The Provincially identified Agricultural System created consistency for application of the Growth Plan policies across the Region. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain the Provincially identified Agricultural System.
4.3.3	Lot Creation and Lot Adjustments	
4.3.3.1 Policy related to permitting residential lot creation in prime agricultural areas	<ul style="list-style-type: none"> • Policy changed to permit new residential lot creation on prime agricultural land. This was previously explicitly discouraged in the current Provincial Policy Statement. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Maintain prohibition on new residential lots.
4.6	Cultural Heritage and Archaeology	
4.6.1 Policy related to conserving	<ul style="list-style-type: none"> • This policy excludes properties listed on the municipal heritage register. Recommend reverting to the original definition of "built 	<p>Partially Support</p> <p>If approved, recommendation revisions:</p>

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protected heritage properties	<p>heritage resource" from 2020 as Bill 23 now has a 2-year time limit for listed properties which will greatly reduce the number of listed properties. Modernizing the Register is sufficient to scope the number of properties versus deleting the Heritage Register in its entirety. Further, with the 2-year time limit the Register will no longer capture Provincial and Federal properties since they cannot be designated by the City.</p>	<ul style="list-style-type: none"> • Modify “built heritage resource” definition so it reads: “means a building, structure, monument, installation or any manufactured or constructed part or remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an Indigenous community. Built heritage resources are located on property that may be designated under Parts IV or V of the Ontario Heritage Act, or that may be included on local, provincial, federal and/or international registers.” • Clarify that this policy applies to archaeological resources as well.
<p>4.6.3</p> <p>Policy related to conserving protected heritage properties</p>	<ul style="list-style-type: none"> • This policy does not apply to properties adjacent to those listed on the municipal heritage register. Recommend broadening the definition of "protected heritage property" to encompass properties listed on the heritage register. Consequently, this policy would extend to properties adjacent to those listed on the heritage register, leading to the conservation of a broader spectrum of heritage resources. • In the absence of a designation by-law/Heritage Conservation District Plan etc. that clearly notes archaeological resources as heritage attributes of the property, it is possible to overlook that this policy applies to lands with known archaeological resources as per 	<p>Partially Support</p> <p>If approved, recommendation revisions:</p> <ul style="list-style-type: none"> • Consider expanding the definition of “Protected Heritage Property” to include “Properties listed on the Municipal Heritage Register under Section 27 of the Ontario Heritage Act.” • This matter would affect Policy 4.6.3 regarding development on “adjacent lands” and the definition of “adjacent lands” as it relates to “Protected Heritage Property”: <p>“c) For the proposes of policy 4.6.3, those lands</p>

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	the new definition of “protected heritage property”.	contiguous to a <i>protected heritage property</i> .”
4.6.4 Policy related to developing an archaeological management plan and strategies to identify heritage properties	<ul style="list-style-type: none"> Adds language that planning authorities “are encouraged to develop” and “implement” proactive strategies for identifying properties for evaluation under the Ontario Heritage Act. 	<p>Support in principle</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Provide clarification on what is meant by “proactive strategies” for identifying properties for evaluation under the Ontario Heritage Act.
4.6.5 Policy related to engaging with Indigenous communities	<ul style="list-style-type: none"> Provides direction for planning authorities to engage early with Indigenous communities on matters related to archaeological resources, built heritage resources, and cultural heritage landscapes. 	Support
5.1	General Policies for Natural and Human-Made Hazards	
5.1.1 Policy related to identifying hazardous lands and sites	<ul style="list-style-type: none"> Policy removes reference to the risk associated with a changing climate. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain language to “including the risks that may be associated with the impacts of a changing climate”.
5.3	Human-Made Hazards	
5.3.2 Policy related to remediating lands	<ul style="list-style-type: none"> Removed direction to reuse excess soil on site or locally through development applications. This risks excess soil going towards landfill instead of onsite reuse. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain Growth Plan policies 4.2.9.2 and 4.2.9.3
6.1	General Policies for Implementation and Interpretation	

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<p>6.1.4</p> <p>Policy related to Ministerial decisions and government priorities</p>	<ul style="list-style-type: none"> Provides more flexibility for the Minister to make land use planning decisions that deviate from the Policy Statement. This creates uncertainty with respect to the planning framework and its implementation. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Revise to clarify that MZOs, should always be consistent with the PPS and have regard to the matters of provincial interest as spelled out in the Planning Act.
<p>6.1.5</p> <p>Policy that relates to the purpose of Official Plans and expectations regarding updates to reflect the PPS</p>	<ul style="list-style-type: none"> Does not include the first paragraph of PPS 4.6, stating primacy of the official plan in implementing the PPS. Restore this paragraph. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Prepend the following paragraph: “The official plan is the most important vehicle for implementation of this Provincial Planning Statement. Comprehensive, integrated and long-term planning is best achieved through official plans.”
<p>6.1.7</p> <p>Policy related to the timing of when planning decisions must be consistent with the PPS</p>	<ul style="list-style-type: none"> Policy states that planning authorities, when making a decision on a planning matter before they have updated their policies to be consistent with the PPS, must still make a decision that is consistent with the PPS. 	<p>Unsupportive</p> <p>If approved, recommend revisions:</p> <ul style="list-style-type: none"> Provide planning authorities will sufficient time to review, analyze and engage on affect Official Plan policies before decisions needs to be consistent with the PPS. Include as part of the transition regulation that all planning matters (Official Plan Amendments or Zoning By-law Amendments) that predate the in-effect date of the new Provincial Planning Statement be transitioned under the existing planning framework. These include

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		<p>planning matters that are: (1) deemed complete and in process/ under review; (2) city-initiated process underway or nearing completion, or (3) Council-adopted but is under appeal or appeal period nearing.</p> <ul style="list-style-type: none"> • Continue to transition Official Plan Amendment 231 under the Planning Act as a matter in process that was approved under the Growth Plan, 2006, but is currently under appeal at the Ontario Land Tribunal.
<p>6.1.9</p> <p>Policy that relates to assess progress on the implementation of the PPS</p>	<ul style="list-style-type: none"> • Does not include consultation. • The implementation of O.Reg. 73/23 Municipal Reporting of Planning Data has been problematic because the Regulation and proposed modifications do not reflect Planning application approvals processes and are internally inconsistent resulting in data collection that is unlikely to support meaningful indicators of the outcomes and implementation of the current or proposed PPS. • Improvement of the Regulation could be achieved through consultation with municipalities. Restore PPS 4.8 language. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Revise the policy as follows: “To assess progress on implementation of this Policy Statement, the Province, in consultation with municipalities, Indigenous communities, other public bodies and stakeholders, may:....”
<p>6.2</p>	<p>Coordination</p>	
<p>6.2.1</p> <p>Policy related to using a coordinated, integrated, and comprehensive</p>	<ul style="list-style-type: none"> • Policy change is proposing to remove a more prescriptive requirement in the Growth Plan that requires planning authorities to undertake "integrated planning". • This change could create ambiguity and inconsistencies 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Change policy to read: “A coordinated, integrated, and comprehensive

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approach to planning	<p>among planning authorities with respect to the degree to which they undertake integrate and coordinated planning.</p> <ul style="list-style-type: none"> • Integrated and coordinated planning forms the foundation of good planning that accounts for the complex and multifaceted nature of building complete communities that have the required soft and hard infrastructure. • A growth management approach that is integrated with infrastructure planning and financial planning has proven to be successful over the last few decades in using land more efficiently, by encouraging more compact, complete communities reducing sprawl. 	<p>approach shall be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies, boards and Service Managers including.”</p>
<p>6.2.2</p> <p>Policy related to planning authority engagement with Indigenous communities</p>	<ul style="list-style-type: none"> • Policy strengthens direction regarding early engagement and coordination on land use planning matters with Indigenous communities, which includes supporting the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Clarify the scope of a municipality's obligation to identify potential impacts of decisions on the exercise of Aboriginal or treaty rights and how the Province's role in addressing asserted Aboriginal or treaty rights will be integrated in the municipal decision-making process. • Provide guidance on expectations with respect to municipal engagement with Indigenous communities on land use planning matters that identify best practices.
<p>6.2.4</p> <p>Policy related to</p>	<ul style="list-style-type: none"> • Supportive of new policies that direct municipalities to work collaboratively with school boards 	<p>Support</p>

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collaborating with school boards to meet current and future needs	to ensure schools are planned for as part of large development sites and complete communities.	
6.2.5 Policy related to collaborating with publicly-assisted post-secondary institutions to meet student housing needs	<ul style="list-style-type: none"> This policy aligns with the City’s commitment to address housing needs of post-secondary students, faculty and noted in the Housing Action Plan 2022-26, however, the proposed changes introduced to the Planning Act, 1990 and the City of Toronto Act, 2006 in Bill 185 preclude the collaboration in this policy as these changes exempt undertakings of post-secondary institutions from the Planning Act, 1990 and sections 113 and 114 of the City of Toronto Act, 2006. 	Do Not Support
Definitions		
Housing Option	<ul style="list-style-type: none"> Removed reference to affordable housing, which weakens direction and the policy rationale for municipalities to define and use municipal official plans and policy documents to address housing affordability challenges. 	Do Not Support If approved, recommended revisions: <ul style="list-style-type: none"> Revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes. Change definition to read: “Housing options: means a range of housing types, tenures, unit types, and affordability levels, such as, but not limited to...affordable housing, purpose-built rental housing....”
Affordable (Housing)	<ul style="list-style-type: none"> The proposed definition does not align with the definition of affordable housing proposed 	Partially Support

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	<p>through Bill 134: <i>Affordable Homes and Good Jobs Act, 2023</i> (Bill 134) and included in the <i>Development Charges Act, 1997</i>. Comments on Bill 134 were provided in item PH7.7 adopted by City Council on November 8, 2023.</p> <ul style="list-style-type: none"> • The proposed definition in Bill 134 uses an income-based approach for affordable rental and affordable ownership housing and aligns with the City’s in-force Official Plan affordable definitions. The income-based definition better reflects a human rights approach ensuring the price and rent for affordable units are more aligned with what low-and moderate-income households can afford. The definition proposed through Bill 134 will come into effect on June 1, 2024. • Further, this policy does not include the “Affordable Residential Units bulletin” that the Province included in Bill 134, which would be published to sets out the income-based affordable rent and average market rent, and which is expected to be published on June 1, 2024. • Different definitions of affordable housing can create confusion and act as barriers to private and non-profit housing developers seeking program funding or incentives. A common definition that is used consistently in provincial policies and legislation provides clarity in the use of municipal land use planning tools to support the development of affordable housing and furthers housing goals for municipalities and the province. 	<p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Align with the current definition of affordable housing in the <i>Development Charges Act, 1997</i> for use in implementation of land use planning tools. Further, identify and align the policy with the “Affordable Residential Units Bulletin” noted in the <i>Development Charges Act, 1997</i>, as well as the City’s in-force Official Plan affordable definitions. • Guidance should be provided on how the affordable definitions apply to student housing applies in relation to the Residential Tenancies Act, 2006 as well as the definition of affordable housing in Bill 134 and included in the <i>Development Charges Act, 1997</i>.

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	<ul style="list-style-type: none"> • Municipal boundaries rather than the ‘regional market area’ are identified as area for the calculation of affordable rents and ownership prices. This provides clarity in the calculation of affordable rents and ownership prices. Comments which requested clarification of these boundaries were included in the City’s comments to Bill 134 in item PH7.7 adopted by City Council on November 8, 2023. • Proposed policies in the 2024 PPS 6.2.5 and 6.2.6 require collaboration for student housing options and a student housing strategy. The income-based affordable housing definition will be challenging to implement in relation to the creation of affordable housing options for students as student incomes commonly fall on the low end of the low to moderate income housing deciles. 	
Employment Areas	<ul style="list-style-type: none"> • Definition has been scoped to exclude institutional and commercial uses, including retail and office not associated with the primary employment use. Changing the definition will destabilize <i>Employment Areas</i> and undermines the City’s ability to achieve employment projections and long-term economic viability. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Revise definition to explicitly include all types of office, retail and services uses within Employment Areas.
Protected Heritage Property		<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Expand the definition of “Protected Heritage Property” to include “Properties listed on the

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		<p>Municipal Heritage Register under Section 27 of the Ontario Heritage Act.”</p> <ul style="list-style-type: none"> • This matter would also affect the definition of “adjacent lands” as it relates to Protected Heritage Properties: “c) For the proposes of policy 4.6.3, those lands contiguous to a <i>protected heritage property</i>.” • Modify the definition so that it reads: “Protected heritage property: means property designated under Part IV or VI of the <i>Ontario Heritage Act</i>; • property included in an area designated as a heritage conservation district under Part V of the <i>Ontario Heritage Act</i>; • property subject to a heritage conservation easement or covenant under Part II or IV of the <i>Ontario Heritage Act</i>; • properties listed on the Municipal Heritage Register under Section 27 of the Ontario Heritage Act. • property identified by a provincial ministry or a prescribed public body as a property having cultural heritage value or interest under the Standards and Guidelines for the Conservation of Provincial Heritage Properties; • property with known <i>archaeological resources</i> in accordance with Part VI of

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		the <i>Ontario Heritage Act</i> , property protected under federal heritage legislation; and UNESCO World Heritage Sites.”
Residential Intensification	<ul style="list-style-type: none"> Definition Removed. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Maintain the current definition of “Residential Intensification”.
Waste Management System	<ul style="list-style-type: none"> No changes to the definition but opportunity to provide clarification. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Change definition to consider the waste hierarchy and is inclusive of and prioritizes resource recovery and environmental outcomes consistent with the Province’s circular economy ambitions.
Major Transit Station Area	<ul style="list-style-type: none"> Definition states that a major transit station area can be the “area including and around a major bus depot in an urban core.” However, “major bus depot” and “urban core” are not defined. The TTC has many bus facilities that are not associated with a higher order transit station. Furthermore, “major bus depot” excludes streetcar facilities. Removing reference to walking distance puts sites technically within 800 m of an MTSA but blocked by barriers (e.g., highway, rail corridor) and not walkable, 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Provide additional policy direction on how municipalities are to interpret “major bus depot” and “urban core”. Maintain definition as proposed in the Provincial Planning Statement 2023

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	<p>within the definition of MTSA. Could encourage car-oriented development due to long walking distances to MTSA.</p>	
Multimodal	<ul style="list-style-type: none"> Definition includes “rail” but is ambiguous as to interpretation. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Revise definition to read: “means relating to the availability or use of more than one form of transportation, such as automobiles, walking, cycling, buses, streetcars, rapid transit, higher order transit, rail (such as commuter, inter-city, and freight), trucks, air, and marine.”
Negative Impacts	<ul style="list-style-type: none"> In regard to policy 3.3.3, definition favours planned corridors over existing corridors. Older segments of the subway system require ongoing upgrades to meet present day AODA and OBC requirements. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Revise definition to read: c) “in regard to policy 3.3.3, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs or meet legislative requirements, and cost of implementation or modernization of the corridor.”
Planned Corridors	<ul style="list-style-type: none"> Definition favours planned corridors over existing corridors. From a transit perspective, definition appears limited to planned Provincial transit 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Revise definition to read:

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	expansion projects and not existing transit infrastructure (subways, LRTs, and other operations within a dedicated transit ROW).	“means corridors (including existing higher order transit corridors) or future corridors....”
Strategic Growth Areas	<ul style="list-style-type: none"> The emphasis on underutilized shopping malls and plazas, especially without defining “underutilized” may make it harder to plan for complete communities, as it may result in the loss of retail without replacement. It sends the message that shopping malls and plazas are obsolete. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Delete “(e.g., underutilized shopping malls and plazas)”
Significant wetlands & significant coastal wetlands	<ul style="list-style-type: none"> In alignment with recent changes to the Ontario Wetlands Evaluation System (OWES), the proposed Provincial Planning Statement has removed reference to the Ministry of Natural Resources and Forestry’s role in identifying wetlands as significant. This change was considered in the Environmental Registry posting 019-6160, with a decision posted on December 22, 2022. City Planning continues to have concerns related to the removal of Provincial oversight of identification or re-evaluation of Provincially Significant Wetlands. This change in oversight, alongside the changes in wetland criteria in OWES, are expected to decrease the level of protection for some significant wetlands across the province where re-designation occurs. 	<p>Do Not Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> Develop and implement, in collaboration with municipal partners, a public reporting tool to track the status of Significant Wetlands in Ontario, including any re-evaluations.
Watershed Planning	<ul style="list-style-type: none"> Definition removes references to the need to integrate and consider: “the management of human activities, land, aquatic life, and resources within a watershed” in 	<p>Do Not Support</p> <ul style="list-style-type: none"> Retain the Growth Plan’s definition of Watershed Planning

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	watershed planning. It also reduces the level of detail around what should be included in watershed planning.	
Transit-supportive	<ul style="list-style-type: none"> • Definition does not reference safety or accessibility which are key components of any transit system – especially higher-order transit corridors below-grade. • Older segments of the subway system require ongoing upgrades (second exits, elevators, fire ventilation shafts) to meet present day AODA and OBC requirements. • To be transit-supportive, development should not preclude the ability of transit agencies to modernize their systems – which is especially challenging for higher-order transit corridors below-grade. • Further, upgrades to modernize below-grade corridors need not preclude development above and adjacent to the upgrades – integration is preferred and is a better use of the land. 	<p>Partially Support</p> <p>If approved, recommended revisions:</p> <ul style="list-style-type: none"> • Revise definition to read: “in regard to land use patterns, means development that makes transit viable, optimizes investments in transit infrastructure, and improves the quality of the experience of using transit, including safety and accessibility. It often refers to compact, mixed-use development that has a high level of employment and residential densities, including: <ul style="list-style-type: none"> a) air rights development, in proximity to transit stations, corridors and associated elements within the transportation system; and/or b) integration with transit stations or corridors.”