



RE: Environmental Registry of Ontario Posting 019-8462 – Review of proposed policies for a new provincial planning policy instrument.

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as 'the City') appreciates the opportunity to provide comments on the proposed changes outlined in the Environmental Registry of Ontario posting 019-8462 – Review of proposed policies for a new provincial planning policy instrument.

The City is supportive of efforts by the Province to address housing supply and development challenges, and remains committed to working with the Province towards their ambitious goal of delivering more housing. The City provides a number of recommendations below in response to the proposed changes.

The changes reflected through the PPS 2024 that the City is most concerned about are summarized as follows:

- Removal of the Municipal Comprehensive Review (MCR) process and subsequent requirements for Planning Authorities to evaluate settlement area boundary expansions and employment conversions at any time;
- Removal of urban growth centres;
- Reduced direction and policies on responding to climate change and protecting the Natural Heritage System;
- Removal of mandatory minimum density target requirements in settlement areas for designated growth areas, and strategic growth areas (other than Major Transit Station Areas);
- Removal of 'office' uses within the definition of employment lands; and,
- Removal of Provincially Significant Employment Zones.

Please see below specific comments on individual aspects of the proposed policy changes. Please note that the proposed changes are listed in order of occurrence within the proposed Provincial Planning Statement, 2024 (PPS 2024) and make reference to the corresponding policies in the proposed Provincial Planning Statement, 2023 (PPS 2023), the current *Provincial Policy Statement, 2020* (PPS 2020), and *A Place To Grow: The Growth Plan for the Greater Golden Horseshoe* (Growth Plan).

Vision			
PPS 2024 Chapter Reference	Key proposed change	City Comment	Recommendation
Vision	Proposal to add text to state that more than anything, a prosperous Ontario will see the building of more homes for all Ontarians.	Although the City supports the Province's aim to increase housing supply, it must take a balanced approach and a strong, competitive economy, and a clean and healthy environment should be given equal importance.	The City recommends that the PPS 2024 include language which demonstrates that strong communities, a clean and healthy environment, and a strong economy are inextricably linked.
Vision	Proposal to remove reference to the fact that the Province's natural heritage resources provide important environmental, economic and social benefits	It is important to demonstrate why natural heritage resources are essential by linking to the environmental, economic, and social benefits that the NHS provides to the greater vision for the province.	The City recommends maintaining the language around natural heritage resources providing environmental, economic, and social benefits.
Vision	Proposal to move reference to resources being managed in a sustainable way to conserve biodiversity and protect essential ecological processes from the Vision to Section 2.5 Rural Areas in Municipalities	The City notes that conserving biodiversity and protecting essential ecological processes applies to all areas, not just rural areas.	The City recommends maintaining the language around sustainable ways to conserve biodiversity and protect essential ecological processes within the Vision.
Vision	Proposal to keep reference to impacts of climate change only within the Vision and Section 2.9 Energy Conservation, Air Quality and Climate	Staff appreciate the statement in the vision that risks associated with the impacts of climate change will be mitigated. However, any mention of preparing for the impacts of climate change have been removed from	The City recommends maintaining the language related to climate change throughout all sections of the PPS 2024.

	Change, and 5.2 Natural Hazards	individual sections of the document and appear only in section 2.9 Energy Conservation, Air Quality and Climate Change and 5.2 Natural Hazards. The proposed change does not effectively integrate preparing for the impacts of climate change throughout all topics within the PPS. In order to effectively address climate change, we must consider it in all elements of decision-making for the use of land/resources	
Vision	Proposal to remove reference to the fact that a clean and healthy environment and a strong economy are inextricably linked	While the proposed PPS does state that a prosperous Ontario will support a strong and competitive economy and a clean and healthy environment, the statement that a clean and healthy environment and a strong economy are inextricably linked is equally important to clearly identify.	<p>The City recommends maintaining the language around the linkage between protection of the environment and a strong economy.</p> <p>The City requests clarification from the Province on how the environment and economy will be effectively balanced.</p>

Chapter 1: Introduction			
PPS 2024 Chapter Reference	Key proposed change	City Comment	Recommendation
1	Addition of the term “large and fast growing municipalities” (LFMs)	The City recognizes the Province’s intent to capture the tenets of the Growth Plan through the term “large and fast-growing municipalities”. However, the magnitude of growth across the Greater Golden Horseshoe will lead to increased demand for infrastructure and coordination across this region to manage growth in an orderly manner. The Growth Plan, alongside the Greenbelt Plan, and Oak Ridges Moraine Conservation Plan play a key role in managing how and where growth should occur and where it should not. The details of the Growth Plan provide key information to deliver a clear plan that reflects the level of growth that these locations will achieve in relationship to where growth must be protected against. The orderly coordination of growth is well determined through the Growth Plan, which differs from the rest of Ontario’s municipalities outside of the Greater Golden Horseshoe.	<p>Although the City supports the Province’s aim to increase housing supply, it must take a balanced approach across planning priorities to ensure the creation of complete communities and coordination to ensure the efficient and effective use of investments. The City recommends that additional policies from the Growth Plan be integrated into the proposed PPS 2024 to provide a standardized land needs assessment methodology, clear settlement area boundary expansion criteria, intensification requirements, and infrastructure planning guidance to support transit, maximize infrastructure to service growth and integrate climate change considerations as a fundamental principle in all planning decisions.</p> <p>Furthermore, the PPS 2020 mentions climate change adaptation in the vision</p>

			statement, which is important to maintain as a key priority.
1	Zoning and development permit by-laws should be forward-looking and facilitate opportunities for an appropriate range and mix of housing options	The City supports the additional text but request expansion to identify the need to balance a range of employment opportunities as a component, ensuring the creation of complete communities.	The City recommends the addition of text to expand beyond housing to consider the range of uses that meet the current and future long-term planning horizon needs of communities.
1	Additional text highlighting the unique role and contribution of Indigenous communities in land use planning and development. Removal of language that provided a focus on the cultural diversity of the Province.	The City agrees with the importance of highlighting the role Indigenous communities must have in the planning process and remains committed to reconciliation.	The City notes that it is important to touch on the Province's rich cultural diversity. This is an integral part of planning in Ontario, especially in Brampton, that should be highlighted.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

PPS 2024 Chapter Reference	Key proposed change	City comment	Recommendation
2	Remove pre-amble text from Section 1.0 Building Strong Healthy Communities (PPS 2020).	The wording in this section should be maintained. This highlights the triple bottom line approach, which is important for good land use planning.	The City recommends maintaining existing language.
2.1	Planning for People and Homes		
2.1.1	Add the requirement for planning authorities to base population and employment growth forecasts on Ministry of Finance 25-year projections and modify projections, as appropriate.	The City is supportive of maintaining the requirement for growth forecasting but requests to be consulted on any proposed provincial guidance relating to the methodology for basing population and employment forecasts on Ministry of Finance projections.	The City requests to be consulted on any proposed provincial guidance relating to the methodology for basing population and employment forecasts on Ministry of Finance projections.
2.1.2	Permit municipalities to continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.	The City is supportive of this amendment.	N/A
N/A	The Growth Plan identified minimum population and employment forecasts for all upper-tier and single-tier municipalities in the GGH, and a Land Needs Assessment for municipalities to evaluate if they have enough land for the	Coordinated and clear provincial guidance is integral to ensure similar approaches are considered in determining the magnitude of growth that can occur in municipalities and how that growth will be accommodated. Leaving municipalities without clear guidance could lead to discrepancies for agencies in how they	The City recommends that growth forecast and land needs assessment methodologies should be provided by the Province for consistent approaches across the province.

	<p>forecasted growth. PPS 2024 does not carry forward both of these concepts. Municipalities will be required to conduct their own growth forecasting moving forward, and the Land Needs Assessment Methodology is removed.</p>	<p>plan and allocate funds for hard and soft infrastructure.</p>	
2.1.3	<p>Amendment to change the time horizon to which official plans must make sufficient land available to accommodate an appropriate range and mix of land uses to meet projected needs from 25 years to 20-30 years.</p>	<p>The City is supportive of the amendment as it aligns better with the update cycle for the Ministry of Finance projections referenced in Policy 2.1.1 (PPS 2024).</p>	N/A
2.1.3	<p>Add the direction for municipalities to incorporate the development potential resulting from a Minister's Zoning Order into the municipality's next official plan update, as an addition to projected needs over the planning horizon established in the official plan.</p>	<p>Zoning orders should consider where growth and development are directed through a local Official Plan. Significant public engagement has occurred to identify how and where major growth should occur and where gentle intensification is more appropriate. The range and mix of uses has been determined through this process and should be considered in what is approved. As the next Official plan update may not take place for another 10 years, it is important to ensure an MZO does not compromise growth allocations in alignment with strategic growth areas and key investment in higher order or rapid transit.</p>	<p>The City recommends MZO's only be approved if there is alignment with the direction set forth through a local Official Plan, aligning with the core principles determined through public consultation and directing large-scale growth to strategic growth areas.</p>

2.1.6	Amendments to policy 1.1.1 (PPS 2020) to reduce the requirements through which Planning Authorities should support the achievement of complete communities.	It is important to maintain the language around “affordable and market-based range and mix of housing types” as “housing options” is too broad of a term. It is also crucial to maintain the importance of parks and open spaces as part of the complete communities.	The City recommends maintaining the language around “affordable and market-based range and mix of housing types” as “housing options” is too broad of a term. The City also recommends maintaining the wording regarding “avoiding development and land use patterns which may cause environmental or public health and safety concerns” and maintaining language around achieving cost-effective development patterns and optimization of transit-investments, as this directly supports the creation of transit-oriented communities and intensification aims for the city.
2.2	Housing		
2.2.1	Amendments to how Planning Authorities should provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market areas (1.4.3 PPS 2020).	The City is supportive of the amendment to maintain minimum targets for the provision of affordable housing. However, the Growth Plan included requirements for municipalities to establish minimum targets for affordable ownership and rental housing.	The City recommends that the Growth Plan requirement for municipalities to establish minimum targets for affordable ownership and rental housing be maintained.
N/A	Removal of Growth Plan policy 2.2.6.1 a) which identifies the requirement for	While the PPS 2024 includes a policy requiring municipalities to establish minimum targets for the provision of	The City recommends the Growth Plan policy 2.2.6.1 be carried into the PPS 2024.

	<p>municipalities to support housing choice through the achievement of the Plan's minimum intensification and density targets by identifying a diverse range and mix of housing options, including ARUs and affordable housing to meet projected needs of current and future residents and to establish targets for affordable ownership housing and rental housing.</p>	<p>affordable housing, the requirement to establish minimum targets for rental housing has not been carried forward. The requirements for LFMs to complete this work and implement them through Official Plan policy is important to advocate for new developments to incorporate affordable housing and/or rental housing into their site plans.</p>	
N/A	<p>Removal of policy direction from Growth Plan policy 2.2.6.3 which provides important direction to ensure the provision of larger, family-size units.</p>	<p>As many households in Brampton live in multi-generational households, ensuring that family size units are available as the city intensifies is integrally important direction to maintain.</p>	<p>The City recommends this policy direction be carried into the PPS 2024.</p>
2.3	Settlement Areas		
2.3	<p>Proposal to remove pre-ambule text from section 1.1.3 PPS 2020</p>	<p>Identification of the importance of efficient development patterns should be maintained, specifically, the focus on the protection of resources and importance of the effective use of infrastructure/public service facilities.</p> <p>Information about variations in settlement areas should be maintained to recognize the vast differences in settlement areas across Ontario.</p>	<p>The City recommends maintaining the preamble text of Section 2.3.</p>

2.3.1.1	Clarification on where growth should be directed in Settlement Areas (1.1.3.1 PPS 2020)	Staff agree with the clarification of where growth should be directed in settlement areas.	N/A
2.3.1.2	Reduce the requirements for land use patterns within settlement areas (1.1.3.2 PPS 2020)	Minimizing negative impacts to air quality and climate change are key tenets for the efficient use of lands and are key pillars for developing sustainable communities. Preparing for the impacts of climate change are integral for long-term planning in Ontario and must be highlighted.	The City recommends maintaining 1.1.3.2 c. and d. from the PPS 2020.
2.3.1.3	Removal of policies regulating new development within settlement areas (1.1.3.3 – 1.1.3.4 PPS 2020).	It should be articulated that planning for a full mix of employment uses, amenities, parks, open space, trails and community services is imperative to creating complete communities.	The City recommends adding “including by planning for a range and mix of housing options, employment, amenities, and community services and prioritizing planning and investment...”
2.3.1.4	Amendment to encourage planning authorities to establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions (1.1.3.5 PPS 2020)	The City is supportive of the amendment to maintain the requirement for minimum targets to be established and implemented for intensification and redevelopment.	N/A
2.3.1.5	Encouraging LFMs to plan for a target of 50 residents and jobs per gross hectare in designated growth areas (rather than new settlement areas or settlement area	While the City is supportive of implementing density targets in designated growth areas, this should be a requirement rather than simply “encouraged”. Furthermore, while the proposed PPS will encourage LFMs to	The City recommends that the policy language be strengthened by “requiring” rather than “encouraging” LFMs to plan for and implement a target of 50 residents and jobs per gross

	expansion lands (2.3.5 PPS 2023)).	establish a density target of 50 residents and jobs per hectare, it will not require implementation of these targets. The City recognizes the importance of directing growth through intensification and recommends the requirements set out in the Growth Plan remain and be carried forward in the PPS 2024.	hectare in designated growth areas. Furthermore, the City recommends the maintenance of 5.2.4 and 5.2.5 of the Growth Plan to be integrated into the PPS 2024.
2.3.1.6	Encouraging planning authorities to establish and implement phasing policies, where appropriate, to ensure that development within designated growth areas is orderly and aligns with the provision of infrastructure and public service facilities.	The City is supportive of the amendment to maintain this policy. However, ensuring the effective provision of infrastructure and public service facilities with development in designated growth areas is critical to achieve complete, healthy communities and should be required rather than encouraged.	The City recommends strengthening the policy language to “shall” rather than “should”.
2.3.2.1 – 2.3.2.2	Removing the requirement for Planning Authorities to identify a new settlement area or allow a settlement area boundary expansion to occur only during a municipal comprehensive review, and reducing the conditions which the new settlement area or boundary expansion must meet (1.1.3.8 – 1.1.3.9 PPS 2020)	Settlement area boundary expansions, as currently based on criteria outlined through the Growth Plan, which have major impacts to infrastructure planning should be limited to comprehensive review processes that are evaluating the overall impacts to long-range planning over the planning horizon.	The City recommends maintaining the existing wording, specifically on when refinements can be made (through the MCR process) in a manner that manages expansion and protects for future growth, prioritizing intensification. 1.1.3.8 a. (PPS 2020) should also be maintained, as priority focus should be on intensification, redevelopment and designated growth areas and reducing greenfield

			expansion. Furthermore, reference to protecting public health and safety and the natural environment in policy 1.1.3.8 b. (PPS 2020) should also be maintained.
N/A	Removal of policy regulating settlement area expansions into the NHS	The loss of guidance for settlement area expansions into the NHS creates a major gap in the protection of the NHS.	The City maintains that this policy language be included within the PPS 2024.
2.4	Strategic Growth Areas		
2.4.1.2	Removal of requirement for planning authorities to identify an appropriate minimum density target for each strategic growth area (5.2.3.2, Growth Plan).	Identifying minimum density targets is an important step to planning for effective strategic growth areas and ensures that municipalities are able to prioritize intensification in the appropriate locations.	The City recommends that planning authorities continue to be required to identify minimum density targets in strategic growth areas.
2.4.1.3	Amendment to encourage planning authorities to prioritize planning and investment for infrastructure and public services, identify appropriate transition of built forms, plan for the achievement of complete communities, consider a student housing strategy, and support redevelopment of commercially designated retail lands for mixed-use residential.	The City is supportive of the amendment to prioritize infrastructure, public service facilities, and the achievement of complete communities through a variety of tools.	N/A

N/A	Removal of policies regulating the reduction in the size or change in the location of urban growth centres, previously proposed through the PPS 2023.	Urban growth centres are an important planning tool that allow planning authorities to focus intensification and redevelopment within central locations such as existing and emerging downtowns.	The City recommends maintaining the concept of urban growth centres and associated minimum density targets.
2.4.3.1	Amendment to require planning authorities to plan for intensification on lands adjacent to existing and planned frequent transit corridors, where appropriate	The City is supportive of the amendment.	N/A
2.5	Rural Areas in Municipalities		
2.5	Removing the requirement for Planning Authorities to apply relevant policies of Section 1: Building Strong Healthy Communities, Section 2: Wise Use and Management of Resource, and Section 3: Protecting Public Health and Safety (PPS 2020) when directing development on rural lands (1.1.5.1 PPS 2020)	The City supports maintaining the application of other policies in planning for rural lands.	The City recommends that 1.1.5.1 from the PPS 2020 be maintained.
2.8	Employment		
2.8.1.1	Amendment to how Planning Authorities shall promote economic development and competitiveness (1.3.1 PPS 2020).	The City supports intensification of employment uses but the original policy 1.3.1 e. should be maintained to ensure the necessary infrastructure is delivered to support growth.	The City recommends the words “liveable and resilient” be maintained and that the original policy 1.3.1 e. be maintained: “e. ensuring the necessary infrastructure is provided to

			support current and projected needs.”
2.8.1.3	Amendment to permit a diverse mix of land uses, including residential, employment, public service facilities, and other institutional uses on lands outside of employment areas, while taking into account the transition of uses to prevent adverse effects.	This policy should provide further details to ensure that employment uses are still delivered in the mixed-use context.	The City requests further clarification to ensure that employment is still delivered in the mixed-use context.
N/A	Removal of 2.8.1.4 (PPS 2023) prohibiting official plans and zoning by-laws from being more restrictive than policy 2.8.1.3.	The City is supportive of this amendment as it provides planning authorities flexibility in administering the PPS.	N/A
2.8.1.5	Amendment to direct major office and major institutional development to MTSAs or other strategic growth areas where frequent transit service is available	The City agrees with the direction for major office and major institutional development in strategic growth areas where frequent transit is available. The City supports protections of locations for major office to ensure a full mix of employment uses across the city.	The City requests the ability to enforce policies protecting employment areas to ensure the long-term economic growth and development of the city.
2.8.2.2	Amendments to how planning authorities shall designate, protect, and plan for all employment areas in settlement areas.	The City requests that major office also be protected in employment areas and that office uses not associated with the primary employment use should not be prohibited. Office nodes should have the same protection policies as other employment areas as they are a significant component of the city’s job base. Aligned with the comments	The City requests the Province maintain office as a key protected employment use.

		submitted to the change of definition to employment areas in the <i>Planning Act</i> under Bill 97, the City requests that office remain a protected employment use.	
2.8.2.3	Removal of the requirement for planning authorities to assess and update employment areas through an official plan review or update (1.3.2.2 PPS 2020).	The City supports the assessment and update of employment areas, however, this should be conducted through an Official Plan review or update.	The City recommends maintaining the original language identifying the appropriate time to assess and update employment areas.
2.8.2.4	Amendment to reduce requirements for industrial and manufacturing uses in employment areas to provide separation and mitigation from sensitive land uses, and for sensitive land uses that are not ancillary to manufacturing or industrial uses in employment areas to be prohibited (1.3.2.2, 1.3.2.3 PPS 2020).	The separation or mitigation for sensitive land uses is integral to be maintained through policy, ensuring the health and safety of residents and workers in the city. Land use compatibility is integral to the planning of these locations and the long-term viability of employment areas. Although the D-6 Guidelines provide further requirements for land use compatibility, protection through the PPS 2024 is important to enshrine these guidelines through policy.	The City recommends language from the original policy 1.3.2.2 and 1.3.2.3 (PPS 2020) be maintained.
2.8.2.5	Amendments to how and when planning authorities may permit employment conversions, which will no longer be required to be conducted at the time of municipal comprehensive reviews (1.3.2.4 PPS 2020).	Employment conversion policies have been a significant tool in the protection of employment areas since they were established. Brampton has experienced enormous pressure to convert employment lands, and without these policies it will be much easier to erode the city's employment areas. Municipal Comprehensive Reviews	The City recommends maintaining the current conversion requirements limiting conversion or removal of employment lands during an MCR. If the current conversion requirements are not maintained, the City recommends that municipalities be authorized to

		offer an ideal time to comprehensively evaluate the existing employment areas, where a conversion could be warranted and holistically look at the impact to the entire employment land base. Enabling conversions or removal of employment lands at any time could lead to the erosion of critical employment areas across the city, leaving reduced or patchwork areas. This is also where the maintenance of the provincially significant employment zone is important, as it provides further protections for key employment lands in Brampton.	strengthen Official Plan policies to limit conversions.
N/A	Removal of the concept of Provincially Significant Employment Zones and policies related to PSEZs (1.3.2.5 PPS 2020).	The protection of employment areas through Provincially Significant Employment Zones or regionally significant areas are critical to the provincial and local economy and should be maintained and protected for long-term economic health. Provincial housing targets should not have an impact on the Province's ability to protect the long-term viability of employment areas, and without the protection of a PSEZ, they run the risk of being slowly eroded by the introduction of sensitive uses.	The City requests the maintenance of Provincially Significant Employment Zones to protect critical employment lands in the city.
2.9	Energy Conservation, Air Quality and Climate Change		
2.9.1	Removal of requirements to support energy conservation and efficiency through land	The City requests that the support for energy conservation, efficiency and improved air quality, as well as public	The City recommends the Province maintain reference to transit supportive land use and

	<p>use and development patterns including promoting active transportation and transit supportive development, focusing travel and freight intensive uses on sites which are well served by relevant modes of travel, etc. (1.8.1 PPS 2020)</p>	<p>transit-based policies remain in the policy (original language) to ensure climate change remains a key pillar for planning decision-making. As a key principle for growth, the new draft Official Plan aligns land use to public transit investment, ensuring growth and intensification occurs in a sustainable manner, thereby reducing car-oriented development.</p> <p>The design and orientation policy that speaks to maximizing energy efficiency and considering the mitigation effects of vegetation and green infrastructure, as well as maximizing vegetation within settlement areas are integral for healthy communities that are working to address climate change.</p>	<p>development patterns that shorten commute journeys and decrease congestion, as well as language that mitigates effects of vegetation and design/orientation that maximizes energy efficiency and conservation, while integrating green infrastructure.</p>
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Chapter 3: Infrastructure and Facilities

PPS 2024 Chapter Reference	Key proposed change	City Comment	Recommendation
3.1	General Policies for Infrastructure and Public Service Facilities		
3.1.1	Removal of requirement for infrastructure and public service facilities to be provided in an efficient manner that prepares for the impacts of a changing climate (1.6.1 PPS 2020)	Preparing for the impacts of climate change when accommodating projected needs for infrastructure and public services is an integral approach to sustainable growth and development in Brampton.	The City requests the language that focuses on preparing for the impacts of climate change be maintained.
3.1.2	Removal of encouragement for investments in infrastructure and public service facilities to be prioritized to support strategic growth areas; and removal of requirement for Planning Authorities to promote green infrastructure (1.6.2 PPS 2020).	The investment and prioritization of infrastructure and public service facilities in strategic growth areas is critical in order to support intensification and the development of healthy, complete communities.	The City recommends the original wording regarding investments in infrastructure and public service facilities, as well as reference to green infrastructure remain, as it is an important policy tool in responding to climate change.
3.1.6	Amendment directing planning authorities to consider and encourage innovative approaches in the design of schools and associated childcare centres	The City supports this policy change and agrees with the direction. As the city grows and intensifies, the development of compact built form for a large array of uses and community services is integral to support the population growth that will occur. Opportunities to encourage the integration of schools and childcare facilities into compact development is encouraged by the City.	N/A
3.2	Transportation Systems		
N/A	Removal of policy 1.6.7.4 (PPS 2020): A land use pattern,	As congestion is a major issue identified by Brampton residents,	The City requests this language be maintained, as it

	density, and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation (1.6.7.4 PPS 2020)	growing in an efficient and sustainable manner requires that land use patterns and a mix of uses be directed in areas already serviced by public transit.	aligns with the core principle of creating 15-minute communities, one of the key goals of the City’s new Official Plan, Brampton Plan.
N/A	Removal of Growth Plan policies identifying that transportation system planning, land use planning and transportation investment be coordinated. It includes direction that the transportation system provides connectivity among modes for moving people and goods to reduce reliance on the automobile and promote transit and active transportation.	The PPS 2024 does not adequately maintain these integral policies, nor does it call for the adoption of a complete streets approach like that ascribed to by the City of Brampton. The City maintains that public transit should be the first priority for transportation infrastructure planning and investment.	The City recommends sections 3.2.1 through 3.2.4 of the Growth Plan be maintained to support integrated land use and transportation planning and integrated into the PPS 2024.
3.5	Land Use Compatibility		
	Removal of specific requirements for permitting sensitive land uses adjacent to industrial, manufacturing, or other major facilities that are vulnerable to encroachment	The separation of sensitive land uses is integrally important, especially for major facilities, as well as planned industrial or manufacturing uses. The removed criteria (3.5.2 a-d) are important considerations to have enshrined in policy.	The City requests the original language identifying the criteria to be demonstrated be maintained.
3.6	Sewage, Water, and Stormwater		
3.6.1	Removal of requirement for sewage and wastewater services to prepare for the impacts of a changing climate (1.6.6.1 PPS 2020)	Staff request maintaining reference to impacts of a changing climate, as it is important to consider in the context of this infrastructure.	The City recommends maintaining the original 1.6.6.1.b.2 “prepares for the impacts of a changing climate”, as this is an integral

			part of responding to climate change through planning for sewage and water services, with a growing role for stormwater management.
3.6.2	Removal of policy language promoting intensification and redevelopment where feasible in areas with existing municipal sewage and water services, to optimize the use of the services; and, clarification provided that municipal sewage and water services include both centralized and decentralized servicing systems (1.6.6.2 PPS 2020).	The City supports opportunities to clarify intent. However, the content identifying that intensification and redevelopment should be promoted should be changed from promoted to “prioritized” to optimize the use of services, as this leads to the most cost efficient and effective method for managing municipal sewage and water services.	The City requests the reintegration and following change to the original language: “Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment should be prioritized wherever feasible to optimize the use of the services.”
3.6.7	Removal of the determination of sufficient reserve sewage system capacity to include treatment capacity, when allowing lot creation (1.6.6.6).	Consideration for treatment capacity from private communal sewage services and individual on-site sewage services should be maintained through policy.	The City recommends the original wording be maintained.
3.6.8	Removal of preparing for the impacts of a changing climate through planning for stormwater management (1.6.6.7).	Preparing for the impacts of climate change plays a key role in stormwater management and is an important priority to highlight through the PPS.	The City recommends maintaining the existing language on preparing for the impacts of a changing climate and the reference to the effective management of stormwater.
	Significant reduction of policies from sections 3.2.6, 3.2.7, and 3.2.8 of the Growth Plan.	Policy direction providing detailed direction and policy requirements for planning for infrastructure to support growth are critical for building healthy, complete communities. This direction is	The City recommends additional policies from section 3.2.6 – 3.2.8 of the Growth Plan be integrated into the PPS 2024.

		significantly reduced through the PPS 2024.	
3.7	Waste Management		
3.7.1	Removal of requirement for waste management systems to facilitate, encourage, and promote reduction, reuse, and recycling objectives (1.6.10.1 PPS 2020).	The City recognizes that Integrated Waste Management includes reducing, reusing and recycling, as well as recovering energy from waste that cannot be managed in other ways. Maintaining language to this effect to explain Integrated Waste Management is important to ensure the intent of reducing waste, reusing materials, recycling and recovering energy from waste is highlighted.	The City recommends expanding the wording to explain integrated waste management to ensure the objectives of this model are clearly identified.
3.8	Energy Supply		
N/A	Removal of policies regarding 'Long Term Economic Prosperity' (1.7.1 PPS 2020)	The City recommends maintaining the entire section to ensure that the economic growth of the city occurs in a manner that is optimizing land, resources, infrastructure and public service facilities, enhancing downtowns (Brampton has invested in a vibrant Downtown and Uptown), encouraging a sense of place, promoting the redevelopment of brownfield sites, providing reliable multimodal transportation systems and sustainable tourism development. The agricultural system policies, energy conservation and increased energy supply, as well as minimizing negative impacts from climate change are critical to supporting the long-term environmental	The City recommends maintaining the original policy language.

		health of Brampton, as well as Ontario more generally.	
3.9	Public Spaces, Recreation, Parks, Trails and Open Space		
3.9.1	Removal of the requirement for publicly accessible built and natural settings for recreation to be equitably distributed (1.5.1 PPS 2020).	<p>The City supports the addition of “inclusive communities”, as well as “persons of all ages and abilities” to identify the full range of needs in planning for residents at every age, stage and ability.</p> <p>However, the City requests “Equitable distribution” remains, as this is an integral part of good planning, as historically, access to public spaces, recreation, parks, trails and open space have not always been fairly considered especially for vulnerable or marginalized communities. Maintaining equitable distribution in this section is important to ensure past historical inequity does not continue.</p>	The City recommends keeping “equitable distribution” in the wording to recognize that planning for equity, specifically in public spaces, recreation, parks, trails and open space, is integral for great communities for people of all ages, abilities, incomes and backgrounds.

Chapter 4: Wise Use and Management of Resources

PPS 2024 Chapter Reference	Key proposed change	City comment	Recommendation
4.1	Natural Heritage		
N/A	Removal of mapping of the Natural Heritage System for the Growth Plan (4.2.2.1, Growth Plan)	The City is concerned about the loss of Natural Heritage System mapping through the Growth Plan. Each municipality may not utilize the same methodology to ensure connectivity across the greater NHS system, which could lead to reduced linkages and increased disruptions to the greater NHS system with the absence of comprehensive mapping, as currently provided in the Growth Plan.	The City requests that further information be provided in order to understand the full impacts of the changes with the revocation of the Growth Plan on Natural Heritage System mapping, to ensure that this does not lead to any erosion of the NHS as a whole. Further the City requests clarification regarding what is permitted to be mapped if municipalities are to undertake their own methodology for NHS mapping. If municipalities are only permitted to map significant features, this leaves out a large portion of the NHS that is not significant but that is currently protected through policies within Official Plans as a result of the Growth Plan.
N/A	Removal of requirement for municipalities to incorporate the Natural Heritage System for the Growth Plan as an	Further to the above comments related to NHS mapping, the integrated, systems planning of the NHS will be lost in the absence of detailed mapping. In	The City requests clarification be provided about whether municipalities may provide stronger policy language in their

	<p>overlay in official plans, and apply appropriate policies to maintain, restore, or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features and areas (4.2.2.2, Growth Plan)</p>	<p>addition, removing language around developing appropriate policies that will maintain, protect, restore and enhance the NHS and replacing it with more general language in the PPS (e.g., “should be maintained, restored or, where possible, improved”) weakens its strength and also makes it difficult to understand whether municipalities will be able to implement strong “shall/will” policies in their Official Plans.</p>	<p>Official Plan policies around maintaining, restoring, or enhancing the NHS.</p>
N/A	<p>Removal of policies regulating the conditions for development or site alteration within the NHS (4.2.2.3, Growth Plan)</p>	<p>The proposed PPS 2024 policies prohibit development or site alteration within significant natural heritage features and areas, however this is not sufficient to protect the entirety of the NHS.</p> <p>The intent of the policy is to protect the long-term ecological function and biodiversity of the natural heritage system. The definition provided of natural heritage system within the PPS 2024 identifies ‘other natural heritage features’, which could be interpreted to include non-significant natural heritage features. This is not included within the ‘natural features and areas’ definition. In addition, environmental buffers are not included within the definition.</p>	<p>The City requests clarification on whether municipalities are still able to manage/protect natural heritage features not identified as significant, including environmental buffers, in the PPS 2024.</p>
N/A	<p>Removal of policies regarding implementation of provincial</p>	<p>See comments above related to NHS mapping.</p>	<p>The City requests further information be provided in order</p>

	mapping of the Natural Heritage System for the Growth Plan (4.2.2.4 & 4.2.2.5, Growth Plan)		to understand the full impacts of the changes with the revocation of the Growth Plan on Natural Heritage System mapping, to ensure that this does not lead to any erosion of the NHS as a whole
N/A	Removal of requirement for municipalities to continue to protect an other NHS features or identify new NHS systems (4.2.2.6, Growth Plan)	This policy should remain as it provides strength in helping municipalities to continue to protect NHS features. Furthermore, through the development process, an EIS can help to identify new systems and also refine information on NHS systems, which makes keeping these policies important.	The City maintains that this Growth Plan policy language be included within the PPS 2024 as a key principle for complete communities through the long-term protection of the NHS.
N/A	Removal of policy regulating development and site alteration within vegetation protection zone, and removal of definition of vegetation protection zone (4.2.4.3, Growth Plan)	A vegetated buffer area surrounding a key natural heritage feature or key hydrologic feature. (Greenbelt Plan)	The City recommends the definition and policy be maintained as it is found within Brampton Plan.
4.2	Water		
4.2.1	Removal of the requirement for planning authorities to evaluate and prepare for the impacts of a changing climate to water resource systems at a watershed level when protecting, improving, or restoring the quality and	Water is an important resource and climate change will impact water quality and availability; thus climate change must be accounted for in watershed planning. Furthermore, as the water resource system is integrally linked to the natural	The City recommends maintaining reference to the impacts of a changing climate and also notes that it will be important to assess water-related policies in tandem with the draft Natural Heritage policies.

	quantity of water (2.2.1 PPS 2020)	heritage system, it is important to assess these policies in tandem with the draft natural heritage system policies, when they are published by the Province.	
4.2.3	Amendment to require municipalities to undertake watershed planning to inform planning for sewage and water services and stormwater management, and the protection, improvement, or restoration of the quality and quantity of water.	The City supports the addition of this policy, as well as the amendment that LFMs “shall” undertaking watershed planning.	N/A
N/A	Removal of the concept of key hydrologic features, and areas and removal of detailed policies that permit or prohibit certain types of development or site alteration with key hydrologic features, and areas, and key natural heritage features (4.2.3.1, Growth Plan)	The proposed definition for natural heritage system within the PPS 2024 speaks to areas that support hydrologic function, however it doesn’t mention hydrologic features. This is concerning as it would mean that hydrologic features that are currently protected would be open for development.	While this specific policy applies to areas outside of settlement areas, the City requests clarification on whether municipalities would still be able to protect and manage key hydrologic features and areas as well as key natural heritage features. It is recommended that hydrologic features be included in the PPS.
N/A	Removal of policy regulating development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System for the Growth Plan or a key	This amendment is concerning as it would mean that lands adjacent to natural heritage features, and specifically lands within 120 metres of natural heritage features, that are currently protected would be open for	The City recommends that direction be provided for development adjacent outside of settlement areas proximate to key natural heritage features and key hydrologic areas to

	hydrologic feature (4.2.4.1, Growth Plan)	development or site alteration. Development or site alteration activity in this proximity to natural heritage features can be detrimental for those features.	ensure any impacts on key natural heritage features and key hydrologic areas have been avoided or, if avoidance is not possible, minimized, and to the extent feasible, mitigated.
N/A	Removal of direction for large-scale development outside of settlement areas proposed within a key hydrologic area (4.2.3.2, Growth Plan)	The City is not supportive of this amendment.	The City recommends direction be provided for large scale development outside of settlement areas within a key natural heritage feature/hydrologic area to ensure any impacts on key hydrologic features/areas and key natural heritage features have been avoided or, if avoidance is not possible, minimized and to the extent feasible mitigated
N/A	Removal of requirement for municipalities to identify any additional restrictions to be applied before, during, and after development to protect the hydrologic functions and ecological functions of key hydrologic and key natural heritage features (4.2.4.2, Growth Plan)	Empowering municipalities to ensure the long-term protection of the hydrologic and ecological functions of key hydrologic and key natural heritage features is an important step throughout the development process.	The City requests that the proposed 2023 PPS include language related to additional restrictions to be applied before, during, and after development to protect the hydrologic functions and ecological functions of the feature.
4.3	Agriculture		
4.3.1.1	Amendment to require planning authorities to use an agricultural system approach,	The City supports the amendment for an agricultural system approach to be “required” rather than “encouraged”.	N/A

	based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network		
4.5	Mineral Aggregate Resources		
4.5.4.2	Removal of conditions that permit complete rehabilitation to an agricultural condition to not be required (2.5.4.1 PPS 2020).	The City recommends maintaining policy language that requires planning authorities to consider other alternatives prior to deeming complete rehabilitation not required.	The City recommends maintaining Policy 2.5.4.1 d. from the PPS 2020: “d.) other alternatives have been considered by the applicant and found unsuitable. The consideration of other alternatives shall include resources in areas of Canada Land Inventory Class 4 through 7 lands, resources on lands identified as designated growth areas, and resources.”
4.6	Cultural Heritage and Archaeology		
4.6.1	Protection of “significant” heritage property or cultural heritage landscapes removed (2.6.1 PPS 2020).	Although the PPS does not contain specific requirements that are identified in the <i>Ontario Heritage Act</i> , this change in language underscores the need for municipalities to address listed properties within their heritage register.	The City strongly recommends that the Province reconsider the timeline prescribed in Bill 23 for the review of listed properties.
4.6.2	Amendments to clarify policy language prohibiting development and site	The City supports the amendment to clarify language emphasizing the need	N/A

	altercation on lands containing archaeological resources or areas of archaeological potential unless the archaeological resources have been recovered (2.6.2 PPS 2020).	for archaeological assessment and conservation of artifacts.	
4.6.3	Clarification of when development and site alteration may be permitted on adjacent lands to protected heritage property (2.6.3 PPS 2020).	The City supports the amendment to clarify the policy and notes that the definition of “adjacent” in relation to this policy 4.6.3 in the proposed PPS 2024 should be amended to include contiguous properties and those separated from the protected property by a public right of way.	The City recommends that the following language be used: “Adjacent means those lands adjoining a protected heritage property or that are directly across from and near to a protected heritage property. This includes properties separated by land used as a private or public road, highway, street, lane, trail, right-of-way, walkway, green space, park and/or easement, or an intersection of any of these.”
4.6.4	Removal of requirement for planning authorities to develop and implement cultural plans for conserving cultural heritage (2.6.4 PPS 2020).	Cultural Heritage Master Plans are critical tools for creating a Citywide vision of how cultural heritage can be incorporated into the development and redevelopment processes. This will support a balanced approach to heritage management.	The City recommends policy regarding Cultural Heritage Master Plans be maintained by adding the following language to the existing 4.6.4: “and c) cultural heritage master plans to provide objectives and policies to guide the identification, evaluation, conservation and management of protected heritage resources

			in the context of land development and alteration.”
4.6.5	Amendment to require planning authorities to engage early with Indigenous communities (2.6.5 PPS 2020).	The City supports the amendment and notes that it aligns with Brampton’s ongoing Archaeological Management Plan. Early engagements with First Nations and Indigenous Communities are one of the recommendations through this plan.	<p>The City recommends that the term Indigenous Communities be replaced by “First Nations and Indigenous Communities” throughout the PPS 2024 and not just for the Cultural Heritage section.</p> <p>The City also notes that the PPS 2024 is lacking in sufficient policies and direction on the nature of the duty to consult and the relationship between the Province's responsibilities and those of the municipality's as per Section 35 of the <i>Constitution Act</i>.</p>

Chapter 5: Protecting Public Health and Safety			
PPS 2024 Chapter Reference	Key proposed change	City comment	Recommendation
	Removal of preamble text (Section 3, PPS 2020)	The preamble text is important to identify the context and policy direction of this section.	The City recommends this content be maintained.
5.1	General Policies for Natural and Human-Made Hazards		
5.1.1	Removal of policy language that requires the Province, planning authorities, and conservation authorities to work together to mitigate potential risks to public health or safety or of property damage from natural hazards, including those that may be associated with the impacts of a changing climate (3.0 PPS 2020).	The language around mitigating potential risk to public health and safety is critically important, including the ongoing and changing risks brought about as a result of climate change. Coordination across the City, Province, conservation authorities, the public and other key stakeholders is critical.	The City recommends “mitigating potential risk to public health or safety or of property damage from natural hazards, including the risks that may be associated with the impacts of a changing climate, will require the Province, planning authorities and conservation authorities to work together” be maintained.
5.3	Human-Made Hazards		
	Removal of policy requiring planning authorities to support, where feasible, on-site and local re-use of excess soil through planning and development approvals (3.2.3 PPS 2020).	If soil is not being reused locally then it is being transported, creating GHG emissions.	The City recommends this language remain to support on site and local re-use of excess soil, which will support reduced GHG emissions and impacts on the environment.

Chapter 6: Implementation and Interpretation			
PPS 2024 Chapter Reference	Key proposed change	City comment	Recommendation
6.1	General Policies for Implementation and Interpretation		
6.1.4	Removal of requirement for planning authorities to consider a clean and healthy environment and economic vitality of the Province when implementing this Policy Statement (4.5 PPS)	The City notes that the removed policy language regarding a clean and healthy environment and economic vitality is important when implementing this Policy Statement, as the PPS should be balanced with implementing the triple bottom line (social, environmental, and economic health and well-being of a community).	The City recommends that the original language identifying “to support strong communities, a clean and healthy environment and the economic vitality of the Province” be maintained.
	Removal of policy stating the importance of the official plan as a vehicle for implementation of this Policy Statement (4.6 PPS)	Official Plans are the most important vehicles to implement provincial policies, helping to comprehensively balance key priorities and engage residents to help inform how to implement Provincial policy direction, including balancing government priorities.	The City recommends this policy remain, as this provides critical direction on the importance of Official Plans in implementing Provincial policy and comprehensively evaluating the long-term planning for the city.
6.1.12 – 6.1.13	Amendment to encourage planning authorities to go beyond minimum density targets where appropriate, except where doing so would conflict with any policy of this Policy Statement or any other provincial plan; and be	The City is supportive of the amendment. However, the general reduction in requirements for planning authorities to establish minimum density targets in key growth areas such as strategic growth areas, urban growth centres, designated growth areas, and settlement areas is concerning.	The City recommends maintaining the requirement (rather than encouragement) for planning authorities to establish and implement minimum density targets in strategic growth areas, urban growth

	required to revisit minimum density targets during official plan updates.		centres, designated growth areas, and settlement areas.
6.2	Coordination		
6.2.1	Amendments to add that managing growth and development should be integrated with planning for infrastructure and public service facilities (1.2.1 PPS 2020).	The City supports the proposed amendments and recommends further coordination policies from the Growth Plan be integrated into the PPS 2024.	The City recommends further coordination policies from the Growth Plan be integrated into the PPS 2024.
6.2.2	Amendment to require planning authorities to engage with Indigenous communities early and coordinate on land use matters (1.2.2 PPS 2020)	<p>The City supports the amendment and notes that this is an important change. However, the City notes that consultation and engagement are two different, and equally important priorities to undertake with First Nations and Indigenous communities. Furthermore, in addition to facilitating knowledge-sharing, it is important to specify that Traditional Ecological Knowledge (TEK) sharing will be facilitated as this is the language used by host Nations and speaks to the relationship between land and environment.</p> <p>Early consultation and engagement in these discussions can ensure that trust is established based on collaboration and respect, and that Aboriginal Treaty Rights are guaranteed under the Canadian Constitution.</p>	<p>The City recommends further amending the policy language as:</p> <p>“Planning authorities shall undertake early consultation and engagement with host Nations and Indigenous communities to coordinate on land use planning matters and facilitate (TEK) Traditional Environmental Knowledge-sharing to ensure that potential impacts are identified, considered and included in land use decision-making and that the exercise of Aboriginal or treaty rights is protected.”</p> <p>Furthermore, the City recommends promoting and encouraging the involvement and inclusion of First Nations</p>

			and Indigenous communities in economic opportunities.
6.2.3 - 6.2.7	Amendments to encourage planning authorities to engage the public and stakeholders early, collaborate with school boards, collaborate with publicly-assisted post-secondary institutions to facilitate student housing and a student housing strategy, and take a coordinated approach with the Province and other appropriate stakeholders to implement this Policy Statement.	The City supports the proposed amendments.	N/A

Chapter 7: Definitions			
PPS 2024 Definition Reference	Key proposed change	City comment	Recommendation
Additional Needs Housing	“Special Needs Housing” to now be termed “Additional Needs Housing” with no additional amendments to the definition.	The City is supportive of the proposed amendment.	N/A
N/A	Removal of definition of “Comprehensive review”.	<p>Comprehensive Reviews provide a clear process for an official plan review or amendment to evaluate long-term growth projections, consider how to best accommodate this growth in the city, plan for the relevant services and infrastructure needed to accommodate growth, and evaluate cross-jurisdictional issues to ensure complete communities across regions.</p> <p>Furthermore, settlement boundary expansions, although no longer something the City can explore, provides the Town of Caledon with the ability to expand significantly across their lands. This does impact the provision of servicing for the City if significant expansions happen</p>	<p>The City recommends the maintenance of the comprehensive review process, ensuring that projections are effectively evaluated with prioritization of supporting intensification, infrastructure, public services and facilities. Settlement boundary expansions should be limited to this time to consider the impacts to these changes, particularly to ensure the delivery of hard and soft infrastructure. The inability to consider cross-jurisdictional issues and impacts through a comprehensive review process leaves the City concerned on how these elements will be properly reconciled and growth will be managed efficiently and effectively.</p>

		outside of a comprehensive review process.	
Complete communities	Amendment to include a definition of “Complete communities”	The City is supportive of the proposed amendment.	N/A
Designated growth areas	Amendment to maintain the definition of “Designated growth areas”	The City is supportive of the proposed amendment.	N/A
Employment area	Removal of “office” as a permitted use in employment areas	Office nodes should have the same protection policies as other employment areas as they are a significant component of our job base. Aligned with the comments submitted to the change of definition to employment areas in the <i>Planning Act</i> , the City requests that office remain a protected employment use.	The City recommends that office remain a protected employment use, or that a new definition be given for office uses throughout the city and specific criteria be applied for non-office uses to ensure that these other non-industrial employment functions are also protected.
Housing options	Amendments to the types of housing arrangements and forms defined as “housing options”	Affordable housing should not be removed from this definition as this is a critical housing option that Brampton needs more of. This connects to the maintenance of the “affordable” and “low- and moderate-income household” definition that the City requests remain in the PPS. The City supports the addition of multi-generational housing, student housing, culturally appropriate housing, as well as supportive, community and transitional housing.	The City requests that “affordable housing” be maintained in the definition. Further, the City requests the addition of purpose-built rental housing as an integral component of housing options that includes a mix of tenures (both ownership and rental), and growth of the primary rental market.

Intensification	Amendment to include underutilized shopping malls and plazas in the definition of "Intensification"	The City is supportive of the proposed amendment.	N/A
Strategic growth areas	Amendment to include existing and emerging downtowns, and lands adjacent to publicly assisted post-secondary institutions in the definition of "Strategic growth areas"	The City is supportive of the proposed amendment. However, it seems that this amendment is intended to reconcile the loss of urban growth centres, many of which were existing and emerging downtowns. Despite the addition of these areas within SGAs, the City is concerned that the associated minimum density targets are not carried forward.	The City recommends maintaining urban growth centres to include "existing and emerging downtowns" with associated minimum density targets, as is currently required under the Growth Plan.
Affordable; Low- and moderate-income households	Amendment to maintain the definition of "Affordable" and "Low- and moderate-income households"	The City supports maintaining this definition.	The City request clarity on how the definition of affordable proposed here links to that defined in the Development Charges Act through Bill 134.
N/A	Removal of the definition of "Urban growth centres"	Urban growth centres are an important planning tool that allow planning authorities to focus intensification and redevelopment within central locations such as existing and emerging downtowns.	The City recommends maintaining urban growth centres and associated minimum density targets, as is currently required under the Growth Plan.
	Removal of the definition of "Provincial plan"	The reason for this removal is not clear - this is an important legislative definition to define what constitutes a provincial plan.	The City requests the maintenance of this definition.

Watershed planning	Addition of new definition	<p>Watershed Planning was not previously defined in the PPS 2020, but was defined in the Growth Plan. As the Growth Plan policies are not integrated into the PPS 2024, the City is supportive of including this definition in the PPS 2024. In the Growth Plan, the definition provided for the protection, enhancement, or restoration of water resources. However, the definition in the PPS 2024 only includes the protection of water resources. The Growth Plan also included a description of what watershed planning typically includes, which is missing from the definition in the PPS 2024. The missing items are critical for effective watershed planning.</p>	<p>The City supports this definition brought forward from the Growth Plan into the PPS 2024, however request that the wording more closely resemble the definition in the Growth Plan, include a description of what watershed planning typically includes, and include a reference to consideration of the impacts of a changing climate and severe water events.</p>
Water resource systems	Addition of new definition	<p>Water Resource Systems was not previously defined in the PPS 2020, but was defined in the Growth Plan. As the Growth Plan policies are not integrated in the PPS 2024, the City is supportive of including this definition in the PPS 2024. Further, the Growth Plan definition of water resource system includes water resources necessary to sustain human water consumption while the PPS 2024 definition does not.</p>	<p>The City supports this definition being brought forward from the Growth Plan into the PPS 2024, however request that the wording include mention of human water consumption to reinforce the importance of the water resource system to humans</p>



The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Ganesh'.

Steve Ganesh, MCIP, RPP
Commissioner
Planning, Building & Growth Management