

Appendix 2 – Detailed Comments to Province

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Table 1 - Bill 185 - Cutting Red Tape to Build More Homes Act

Proposed Changes	Potential City Impacts	Comments to the Province
<p>Schedule 6 – Development Charges Act, 1997 Provincial Comment Period closes on May 10, 2024 (ERO: 019-8371) (ORR: 24-MMAH006)</p>		
<p>Repeal mandatory five-year phase-in of DC rates</p> <p>The More Homes Built Faster Act, 2022, introduced the mandatory phase-in of Development Charge (DC) rates over five years for DC by-laws passed on or after January 1, 2022. DCs are discounted by 20% in Year 1, 15% in Year 2, 10% in Year 3, and 5% in Year 4, with the full DC rate applying in Year 5.</p> <p>The repeal would not impact those developments where planning applications have been submitted and the DC rates have been frozen under s.26.2 of the Act.</p> <p>Proposed transition rules:</p> <ul style="list-style-type: none"> • The discounted phase-in rates continue to be “frozen” on site plan application filed on or after November 28, 2022, and before the day that Bill 185 receives royal assent. • Discounted phase-in rates “frozen” prior to November 28, 2022 (and after effective date of the 2022 DC By-law) 	<ul style="list-style-type: none"> • There are a number of site plan applications submitted between November 28, 2022 and present day, that will receive the benefit of a “frozen” phase-in rate. • These developments would receive a 15 to 20 percent discount on their DCs. This results in a DC revenue loss to the City of nearly \$12 million. • The City would need to fund this shortfall in DC revenue using a non-DC funding source or seek grants from upper levels of government. 	<ul style="list-style-type: none"> • The City is supportive of repealing the phase-in of DC rates. • Of the \$12 million in DC revenue loss from the transition provision, \$3.6 million relates to purely employment-related development. It is unclear how a discount in DCs to the non-residential sector would aid in the act of building more homes. • By implementing this transition provision, the Province has effectively created a “window” where certain applications would receive a 15 to 20 percent discount in their DCs. It seems arbitrary that a planning application would not receive this discount if they applied one day before the passage of Bill 23, or one day after the royal assent of Bill 185. This creates inequity amongst the development community. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Fully repeal the phase-in discount such that no planning application will receive a discount by applying between November 28, 2022 and Royal Assent of Bill 185 and repeal the transition provision.

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<p>would no longer benefit from the phase-in discount.</p>		
<p>Reinstate studies as an eligible DC capital cost</p> <p>The More Homes Built Faster Act, 2022 removed the cost of studies as an eligible capital cost that municipalities could recover through DCs.</p> <p>The cost of studies can again be included as a capital cost when calculating the DC rate.</p> <p>Subsection 5 (3) of the Development Charges Act, 1997 is amended to add the costs of certain studies as capital costs for the purposes of section 5. Specified transition and special rules in section 5 are repealed and new transition rules with respect to the repeal of subsections 5 (7) and (8) are added.</p>	<ul style="list-style-type: none"> • The City was not immediately affected by this change in Bill 23 as the City's DC By-law fell under the transition rules. • During the City's next DC By-law review, the City will continue to recover for growth-related studies. 	<ul style="list-style-type: none"> • The City is supportive of reinstating studies as an eligible DC capital cost.
<p>Streamline Process for Extended DC By-laws</p> <p>The More Homes Built Faster Act, 2022 amended the requirement to update and replace a DC by-law from at least once every 5 years to at least once every 10 years. It is now proposed that Municipalities could extend existing DC By-laws through a streamlined process.</p>	<ul style="list-style-type: none"> • The City's current DC by-law contains an expiry date of 2027, therefore the City would be required to extend, or repeal and replace its current DC by-law. • Should the City require additional time in 2027 to update various master planning studies, the City could implement the new subsections in the DC Act to extend its current by-law. 	<ul style="list-style-type: none"> • The City is supportive of the streamlined process for extending DC By-laws. It provides clarity and direction about the permission to undertake administrative amendments to in-force DC By-laws.

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<p>New subsections 19 (1.1) to (1.3) provide that subsection 19 (1) of the Act does not apply to amendments to development charge by-laws in specified circumstances and new subsection 19 (1.4) governs notice of such amendments.</p>		
<p>Reduce Time Limit on DC Freeze</p> <p>Currently, developers have two years – from site plan approval to building permit issuance – to pay their DCs to benefit from the “frozen” DC rate for a site plan application. Bill 185 is proposing to reduce this time frame from two years to eighteen months.</p> <p>Currently, subsection 26.2 (5) of the Act provides that clauses 26.2 (1) (a) and (b) do not apply in respect of certain developments if more than the prescribed time has elapsed since certain applications were approved. This subsection is amended to replace the prescribed time with 18 months.</p>	<ul style="list-style-type: none"> • Many site plan applications make use of conditional building permits and pay their “frozen” development charges and pull their associated building permit prior to site plan approval. Effectively, many site plan applications do not even reach the point where the two year “clock” begins to start. 	<ul style="list-style-type: none"> • DC rates are “frozen” at the time of site plan application (day the site plan is deemed complete). The two-year “clock” does not begin at the point in time, but rather at site plan approval. • Multiple years often elapse from submission of a site plan application to building permit issuance. However, this is not addressed by Bill 185. Therefore, the notion of incentivizing more housing development is not aided by this change to the DC Act. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Implement a time limit on the DC freeze that begins at the date a site plan application is deemed complete and not the approval date (e.g. – consistent with the freeze date). This may encourage fast-tracking of some developments.
<p>Newspaper Notice Requirements and Consequential Housekeeping Changes Provincial Comment Period closes on May 10, 2024 (ERO: 019-8370) (ORR: 24-MMAH012)</p>		

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<p>Public Notice Requirements to DCs and CBCs Proposed amendments to the Development Charges Act, 1997, would enable municipalities to give notice of a proposed development charge (DC) by-law, or passage of a by-law relating to DCs or community benefit charges (CBCs) to give notice of a proposed new/amending by-law or passage of a by-law on a municipal website, if a local newspaper is not available.</p>	<ul style="list-style-type: none"> In accordance with the DC Act, the City posts notices in Mississauga News to advertise for the DC public meeting. For future By-law reviews, the City will be required to provide notice via its municipal website and utilize existing social media platforms. 	<ul style="list-style-type: none"> The City is supportive of this change to modernize the public notice requirements.
<p>Statutory Land Use Planning Notice Requirements The proposed changes to the Planning Act would allow municipalities other ways of giving notice to meet statutory land use planning notice requirements. Municipalities would be able to also provide notice on a municipal website if there is no local print newspaper available.</p>	<ul style="list-style-type: none"> The City currently goes beyond Planning Act requirements for statutory notices. For city-initiated amendments, the City provides digital notice on the its website and online newspapers. For development applications, in addition to having a sign on the subject property and notices mailed by first class mail, the City also provides digital notice on its website. 	<ul style="list-style-type: none"> The City of Mississauga (City) supports the Province’s proposal to allow for digital notification through municipal website if there is no local print newspaper available. <p>Request to the Province:</p> <ul style="list-style-type: none"> Digital notification should also include online newspaper even if local print newspaper is available, and further consideration should be given to the use of other digital media.
<p>Engaging with Culturally Diverse Communities The ministry is working to identify best practices for public engagement, including how municipalities engage culturally diverse communities through non-English and French languages.</p>	<ul style="list-style-type: none"> The City has an interim framework for equitable community engagement and will be updating its framework following the completion of the Anti-Racism and Anti-Oppression Strategy with an expected completion date in 2025. 	<ul style="list-style-type: none"> The City supports the Province’s proposal to explore best practices for public engagement and how to involve culturally diverse communities. <p>Request to the Province:</p> <ul style="list-style-type: none"> A process for equitable engagement should be considered that involves culturally diverse communities and equity deserving groups in a meaningful way.

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		<ul style="list-style-type: none"> The City would welcome collaboration with the Province to identify best practices for engaging with the public.
<p>Schedule 7 – Hazel McCallion Act (Peel Dissolution), 2023 Provincial Bulletin Notice for Information Purposes Only – Posted April 10, 2024 (ERO: 019-8492) Provincial Comment Period Closes May 10, 2024 (ORR: 24-MMAH005)</p>		
<p>Name Change The title of the Act is changed to the Hazel McCallion Act (Peel Restructuring), 2023.</p>		
<p>Repeal of Regional Dissolution Section 2, which provides for the dissolution of The Regional Municipality of Peel and the continuation of the City of Mississauga, the City of Brampton and the Town of Caledon as single-tier municipalities, is repealed.</p>		<ul style="list-style-type: none"> The City remains committed to finding a mutually beneficial solution and are open to constructive dialogue regarding the proposed adjustments.
<p>Transition Board Recommendations Amendments to subsection 3 (5) are made to provide that the board must provide recommendations respecting the transfer of powers, responsibilities or jurisdiction from The Regional Municipality of Peel with respect to land use planning, water and wastewater, storm water, highways and waste management.</p>		<ul style="list-style-type: none"> The City remains committed to finding a mutually beneficial solution and are open to constructive dialogue regarding the proposed adjustments.
<p>Municipalities Must Consider the Transfer of Powers in Decision Making Section 5 is re-enacted to require that the municipalities and their local boards must instead have regard to the transfer of powers, responsibilities or jurisdiction from The Regional Municipality of Peel with respect to the matters set out in new subsection 3 (5.1).</p>	<ul style="list-style-type: none"> It would also remove upper-tier planning responsibilities from the Region as of July 1, 2024. Specifically, the City of Mississauga would assume planning responsibilities related to growth management (e.g. growth forecasting and allocation) and planning for employment areas. 	<ul style="list-style-type: none"> The City has been planning to assume upper-tier planning responsibilities from the Region of Peel, and can meet the July 1, 2024 timeline.

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<p>Compensation Limits Section 9 is re-enacted to set out additional limitations on remedies that no cause of action arises against the Crown, the transition board, The Regional Municipality of Peel, the City of Mississauga as a direct or indirect result of this Act</p>		<ul style="list-style-type: none"> The City remains committed to finding a mutually beneficial solution and are open to constructive dialogue regarding the proposed adjustments.
<p>Schedule 9 – Municipal Act, 2001 Provincial Comment Period closes on May 10, 2024 (ERO: 019-8369) (ORR: 24-MMAH010)</p>		
<p>Allocation of Water Supply and Sewage Capacity Current Act permits municipalities to enact by-laws to establish an allocation system for water and sewage servicing that are subject to a <u>draft plan of subdivision</u>. Changes would give municipalities the authority to pass by-laws which may include the tracking and allocation for water and sewage servicing for approved developments.</p> <p>Adds section 86.1, which provides that a municipality may, by by-law, adopt a policy providing for the allocation of water supply and sewage capacity. Such a policy may include a system for tracking the water supply and sewage capacity available to support approved developments as well as criteria respecting the allocation of water supply and sewage capacity.</p>	<ul style="list-style-type: none"> As the Region currently manages water and sewage services, the roles and responsibilities for decision making/enforcement/etc. need to be agreed-upon by parties. City staff would need to coordinate with the Region on any updates to how servicing is to be allocated. In the event that water and sewage servicing become a City responsibility, staff would need to update its Municipal Servicing By-law, and any other associated processes. 	<p>Request to the Province:</p> <ul style="list-style-type: none"> The City requires further details to understand how to enforce its allocation system, and potential impacts.
<p>Municipalities Assisting Industry to Attract Investment Proposed Section 106.1 of the Municipal Act, 2001 would provide the Lieutenant</p>	<ul style="list-style-type: none"> There are other communities across Ontario/Canada that provide incentives more broadly including land banking, DC offsets, payment of critical infrastructure, etc. This new 	<p>Request to the Province:</p> <ul style="list-style-type: none"> Consult with municipal economic development leaders in developing the draft regulations to ensure they optimize

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<p>Governor in Council to make regulations authorizing a municipality to grant assistance, directly or indirectly, to a specified manufacturing business or other industrial or commercial enterprise during a specified period if considered necessary or desirable in the provincial interest to attract investment in Ontario.</p> <p>Provincial Comment Period closes on May 10, 2024 (ORR: 24-MMAH009)</p>	<p>section of the Planning Act could provide flexibility and may help level the playing field across the Province.</p> <ul style="list-style-type: none"> • Providing incentive at the local level has budget implications (grants, tax revenue losses more broadly across the city, staffing resources, etc.). • If this incentive mirrors ones in the USA, communities across Ontario would now compete more aggressively against each other for investment attraction and possibly company retention. What is typically at the Provincial and Federal level becomes a responsibility of the Municipality. • Mississauga has 1,400 + international companies with nearly 1,000 from the USA that may expect a contribution for both retention and expansion in addition to net new. • Cities don't have the same regulatory, fiscal and reporting tools as province. Making companies accountable for fulfilling their negotiated commitments in exchange for incentives may be challenging. • The city would require additional resources to manage, negotiate agreements, monitor and enforce negotiated agreements with companies. 	<p>incentive tools without unintended negative impacts on municipalities.</p> <ul style="list-style-type: none"> • Regulations should address: <ul style="list-style-type: none"> ○ The type and size of investment that would qualify. ○ Defined parameters for eligibility and ineligibility. ○ Define “commercial enterprise”. ○ Whether developers would be eligible for incentives under this tool or aimed directly at companies. ○ Whether downtown office tenants would be included. ○ How this would work with existing incentive tools, such as CIPs. ○ The approval process to provide a grant, and whether Provincial or Municipal approval is required on a case-by-case. Alternatively, whether a city-wide CIP is required ○ How would this apply to existing businesses, or is it to apply to new net investments/companies currently not located in Ontario. ○ Elements/criteria to be considered for grant assistance. ○ Clarify what is meant by “Desirable in the provincial interest to attract investment in Ontario”. ○ How success is to be measured for the return on the investment. ○ Clarify that existing grants and supports are not being replaced by this incentive.
<p>Schedule 12 – Planning Act</p>		

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<p>Provincial Comment Period closes on May 10, 2024 (ERO: 019-8369) (ORR: 24-MMAH010)</p>		
<p>Remove Planning Responsibilities from Peel, Halton, and York Amendments are made to provide that the Regional Municipality of Peel, the Regional Municipality of Halton and the Regional Municipality of York become upper-tier municipalities without planning responsibilities on July 1, 2024.</p>		<ul style="list-style-type: none"> The City has been planning to assume upper-tier planning responsibilities from the Region of Peel, and can meet the July 1, 2024 timeline.
<p>Remove Parking Minimums from MTSAs and other Prescribed Areas Parking minimums within protected MTSAs, existing/planned higher order transit/stop or will be prohibited.</p> <p>New subsections 16 (22) to (24) will limit the ability of official plans to contain policies requiring an owner or occupant of a building or structure to provide and maintain parking facilities, other than parking facilities for bicycles, within a protected major transit station area, existing or planned higher order transit station and other prescribed areas. Related amendments are made to section 34.</p>	<ul style="list-style-type: none"> The City has been reducing parking requirements over the years and allowing for further parking reductions along the LRT to leverage higher order transit investments and reduce automobile dependency. Further reductions in parking rates are supported provided residents have other transportation options, such as requiring onsite car share spaces and drop off spaces for ride share vehicles; no reductions for visitor and accessible parking. The Zoning By-law would have to be amended not only to reflect the elimination of parking requirements, but future consideration for car share and other TDM measures. 	<ul style="list-style-type: none"> The City has been reducing parking requirements over the years. Removing parking requirements should be done in a manner that minimizes impact on residents and businesses of existing and new developments. The municipality has limited tools available to require measures to help encourage transit and alternative modes of transportation. <p>Requests to the Province:</p> <ul style="list-style-type: none"> Clarify what is meant by “Parking Facilities”. Clarify that municipalities can still regulate parking standards (e.g. parking aisle, size of space) if a developer chooses to provide parking. Consider making municipal parking an eligible DC service to aid in the development of shared lots. Consider options for municipalities to impose criteria in MTSAs to ensure

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		<p>alternative transportation choices are available, for example:</p> <ul style="list-style-type: none"> ○ TDM measures such as car share and bike share spaces and dedicated drop off/pick up spaces for Uber and taxis. These measures are especially important in MTSAs where transit service and active transportation infrastructure are not yet fully constructed ○ Site distance to a Station ○ Having a mix of land uses near the station <ul style="list-style-type: none"> ● The City requests that the elimination of parking requirements not apply to non-residential uses (e.g. commercial), lower density residential uses, visitor and accessible parking.
<p>Limits Third Party Appeals The proposed changes would limit appeal rights for official plans, official plan amendments, zoning by-laws and zoning by-law amendments to only the applicant, the Minister, the approval authority, a public body and specified persons who made oral or written submissions.</p> <p>Third party appeals filed prior to the legislation coming into force and where the hearing has not been scheduled before April 10, 2024, will be dismissed.</p>	<ul style="list-style-type: none"> ● Limits the rights of the general public and participation in the appeals process. ● Third party appeals may be beneficial in unique circumstances where there may be impacts to the economic stability of employment areas due to land use compatibility. For example, a manufacturer would lose the ability to participate in an appeal of an adjacent development application proposing sensitive land uses that may result in additional regulatory and fiscal burdens for those industries. 	<ul style="list-style-type: none"> ● The City generally supports this change, but there should be consideration to recognize unique circumstances where additional participation rights are warranted (e.g. areas where there are potential for land use compatibility issues). <p>Request to the Province:</p> <ul style="list-style-type: none"> ● Enhance criteria in Planning Act to enable OLT to grant party status to third parties to recognize unique circumstances where additional participation rights are warranted.

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<p>Amendments to the Planning Act are made to provide that a person must be a specified person, as currently defined in the Act. New subsections 17 (24.0.1) to (24.0.4) provide for transitional rules. Similar amendments are made to appeal rights under subsections 17 (36) and 34 (19).</p> <p>Provincial Comment Period closes on May 10, 2024 (ERO: 019-8370) (ORR: 24-MMAH012)</p>	<ul style="list-style-type: none"> This would place a burden on municipalities to defend an industry’s interests. 	<ul style="list-style-type: none"> Equip municipalities with more concrete/mandatory policy direction in PPS that municipalities are required to implement to help protect third-party interests.
<p>Removal of Pre-Consultation Requirements for Development Applications</p> <p>Pre-application consultation is voluntary and no longer a requirement.</p> <p>The re-enacted subsection 22 (3.1) does not include the authority for a council or planning board to pass a by-law requiring applicants to consult with the municipality prior to submitting development applications. Pre-consultation is at the applicant’s discretion. Similar amendments are made to sections 34, 41 and 51.</p>	<ul style="list-style-type: none"> This change eliminates the City's ability to mandate a pre-application consultation. Without pre-consultation, applications may be submitted which do not meet City requirements. Low quality submissions may result in delays in approvals and review of application. The city has historically required pre-consultations, which has been beneficial for identifying material to be submitted as part for an application and issues to be addressed early in the process. This leads to greater success in approving applications. 	<ul style="list-style-type: none"> Pre-consultation is a valuable tool for improving the calibre of applications. This change introduces a risk to the overall integrity of land development processes. When a voluntary exception is made without clear justification or criteria, it undermines the consistency and fairness that stakeholders expect, potentially resulting in a loss of trust or transparency, and adding further complexity or cost for all stakeholders. Most Mississauga builders and developers recognize the importance of pre-consultation because it enhances the value of their proposals, is seen as a due diligence measure, and safeguards against risks that could lead to substantial costs for all stakeholders. <p>Request to the Province:</p>

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		<ul style="list-style-type: none"> • Allow municipalities the flexibility to determine when pre-application consultation is required. • Allow municipalities pause the clock or other enforceable mechanism to require additional information that was not identified/ submitted.
<p>Procedural Changes: Motion Re Dispute for Complete OPA Application Changes to re-enact subsection 22 (6.2) would permit applicants to bring forward a motion to the OLT to determine whether the information and materials required for an OPA have been provided, or whether a requirement to provide such information or material is reasonable at any time after pre-request consultation has begun or the application fee has been made.</p> <p>Subsection 22 (6.3), which currently provides for the extension of the timeframe under subsection 22 (6.2) in certain circumstances, is repealed. Similar amendments are made to sections 34, 41 and 51.</p> <p>Provincial Comment Period closes on May 10, 2024 (ERO: 019-8370) (ORR: 24-MMAH012)</p>		<ul style="list-style-type: none"> • Generally, improvements to the OLT are welcomed, however, the City does not support the proposed policy in its current state. The draft is too ambiguous and would lead to uncertainty for proponents and City staff in the development application process. <p>Request to the Province:</p> <ul style="list-style-type: none"> • The policy should be amended to provide clearer guidance for the municipality and applicant.
<p>Request for Amendment Re Protected Major Transit Station Areas (PMTSAs) Proposed changes to Act would allow amendments to PMTSA policies in subsection 16 (15)(b) or 16(16)(b)(i) that</p>	<ul style="list-style-type: none"> • As the City will have single-tier planning authority post-July 1, 2024 this provision would be limited to the exception in 16(5)(b), related to uses of land only. 	

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<p>identify authorized uses of land in the area and or buildings or structures in area without the need for a Council Resolution.</p> <p>Amends subsection 22 (2.1.3) and adds 22(2.1.4).</p>		
<p>Repeal of Refund of Fees Introduced By Bill 109 Subsections 34 (10.12) to (10.14) of the Act, which currently provide rules respecting when municipalities are required to refund fees in respect of applications under that section, are repealed. Transitional rules are provided for in new subsections 34 (35) and (36). Similar amendments are made to section 41.</p>	<ul style="list-style-type: none"> • Bill 109 introduced rules for the refund of development applications that are not processed within provincially-mandated timelines. Many municipalities, including Mississauga, responded by front-ending their requirements for a complete application prior to the clock starting on review timelines (called pre-consultation). • Once an application was submitted, the timelines did not allow for revisions or review of resubmissions. <p>The proposed change will again require procedural changes to the processing of development applications.</p>	<ul style="list-style-type: none"> • The City is supportive of the proposed change.
<p>Repeal Municipalities Ability to Request Minister's Orders Section 34.1 currently provides for Minister's orders that are made at the request of a municipality. The section is repealed and re-enacted to provide a transition rule respecting orders that were previously made under the section.</p>		
<p>Additional Residential Unit (ARU) Requirement and Standards The Minister will be given the ability to establish regulations that removes barriers for additional residential units.</p>	<ul style="list-style-type: none"> • The City has introduced zoning to permit ARUs for up to four units on a lot. With 3 units permitted internal to a building and 1 unit permitted external to the main building. 	<ul style="list-style-type: none"> • The City is supportive of this change, as it complements the City's work in increasing the mix of housing options in Mississauga. <p>Response to Discussion Question 1:</p>

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<p>Subsection 35.1 (2) is re-enacted to authorize the Minister to make regulations establishing requirements and standards with respect to any additional residential units in a detached house, semi-detached house or rowhouse, a residential unit in a building or structure ancillary to such a house, a parcel of land where such residential units are located or a building or structure within which such residential units are located.</p> <p><i>Discussion questions prepared by the Province (on ERO 019-8366):</i></p> <ol style="list-style-type: none"> 1. <i>Are there specific zoning by-law barriers standards or requirements that frustrate the development of ARUs (e.g., maximum building height, minimum lot size, side and rear lot setbacks, lot coverage, maximum number of bedrooms permitted per lot, and angular plane requirements, etc.)?</i> 2. <i>Are there any other changes that would help support development of ARUs?</i> <p>Removing Barriers for Additional Residential Units. Provincial Comment Period closes on May 10, 2024 (ERO: 019-8366) (ORR: 24-MMAH011)</p>	<ul style="list-style-type: none"> • Mississauga has observed an increase in basement second units, but accommodating multiple additional units is complex due to the OBC defining dwellings with three or more units as not being a “house”. Applicants abandon proposals for three units and opt for basement second units instead. 	<ul style="list-style-type: none"> • The in-force zoning related to ARUs is quite flexible in and takes into consideration our local context. A broad exemption of further standards could potential impacts for adjacent properties. • For internal ARUs, no further changes to the City’s By-Law are necessary. Since most ARU are being accommodated in existing dwelling structures, there is no need to change lot coverage, setbacks, height, etc. • For external ARUs, Mississauga has already provided zoning flexibility in the form of additional lot coverage and minimal setbacks, while balancing impacts to neighbouring properties through appropriate height and size permissions. • It should be at the discretion of municipalities to identify reductions in max lot and setbacks requirements to ensure ARUs comply with drainage and Lot Grading By-laws. • The City request the province make municipalities whole for lost revenue from statutory DC and parkland ARU exemptions. <p>Response to Discussion Question 2:</p> <ul style="list-style-type: none"> • Through the City’s consultation on Increasing Housing Choices in Neighbourhoods the following additional barriers were identified: <ul style="list-style-type: none"> ○ the cost of construction

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		<ul style="list-style-type: none"> ○ impact of being a landlord on personal income tax ○ how much property taxes would increase after MPAC reassesses the property with an ARU ○ the ability to remove delinquent tenants and LTB backlog <ul style="list-style-type: none"> ● The City has removed many municipal fees associated with ARUs (e.g. DCs and cash-in-lieu of parkland) and is exploring building permit grants and pre-approved plans as a incentive to increase supply. ● The Province should consider a public education program to encourage Ontarians to become small landlords providing them with relevant resources and financial incentives such as tax incentives.
<p>Lapsing of Approvals of Plans and Drawings Approval authorities can provide for the lapsing of a draft plan of subdivision with a prescribed time set by regulation (default of no less than 3 years if a regulation does not apply).</p> <p>A new subsection 41 (7.1) permits authorized persons referred to in subsection 41 (4.0.1) to provide for the lapsing of approvals of plans and drawings referred to in subsection 41 (4). A new subsection 41 (7.3) permits an authorized person to provide for the lapsing of</p>	<ul style="list-style-type: none"> ● Staff would need to update the development application process to reflect this proposed change 	<ul style="list-style-type: none"> ● The City is supportive of this change, but this change on its own may be insufficient to achieve the desired objectives. ● There may be cases where an extension to timelines for lapsing of approvals would be preferred and much simpler than requiring a new application. <p>Request to the Province:</p> <ul style="list-style-type: none"> ● Consider additional tools to expedite timelines between planning approvals and construction starts.

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<p>previous approvals and, if the person does so, requires the municipality to notify the owner of the land. Amendments are made to subsection 70.1 (1) to authorize certain regulations in relation to subsections 41 (7.1), (7.2) and (7.3), including providing for exemptions to those provisions.</p>		<ul style="list-style-type: none"> Municipalities should be allowed to extend timelines for the lapsing of approvals.
<p>Non-Application – Houses & Ancillary Structures A new section of the Act authorizes regulations that provide for the non-application of any provision of Part V or a regulation under section 70.2, or setting out restrictions or limitations with respect to its application, to houses and ancillary structures meeting prescribed criteria.</p> <p>Removing Barriers for Additional Residential Units. Provincial Comment Period closes on May 10, 2024 (ERO: 019-8366) (ORR: 24-MMAH011)</p>	<ul style="list-style-type: none"> See comments under “Additional Residential Unit Requirement and Standards” 	<ul style="list-style-type: none"> See comments under “Additional Residential Unit Requirement and Standards”
<p>Lapsing of Approvals of Draft Plan of Subdivision Approval authorities can provide for the lapsing of a draft plan of subdivision with a prescribed time set by regulation.</p> <p>Where draft plans of subdivisions were approved on or before March 27, 1995, they will lapse within 3 years of the passing of the Bill.</p> <p>Subsection 51 (32) is re-enacted to, among other things, require approval authorities to provide for the lapsing of an approval to</p>	<ul style="list-style-type: none"> See comments under “Lapsing of Approvals of Plans and Drawings” 	<ul style="list-style-type: none"> See comments under “Lapsing of Approvals of Plans and Drawings”

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<p>a draft plan of subdivision. New subsection 51 (33.4) deals with the lapsing of approvals that were given on or before March 27, 1995. Amendments are made to subsection 70.1 (1) to authorize certain regulations in relation to subsections 51 (32), (32.1) and (33.4), including providing for exemptions to those provisions.</p>		
<p>Post-Secondary Institution Exemptions A new section 62.0.2 is added to the Act to exempt undertakings of certain classes of post-secondary institutions from the Act and sections 113 and 114 of the City of Toronto Act, 2006.</p>	<ul style="list-style-type: none"> • The policy would exempt all publicly funded post secondary institution from the Planning Act, for the purpose of developing student housing. • The City’s Parkland Conveyance By-law applies to post-secondary institutions. These exemptions would impact the cash-in-lieu (CIL) and parkland dedication that the City is currently negotiating with University of Toronto Mississauga (UTM). • The City is generally support an expedited approvals process, but have concerns if a municipal role is not maintained to address potential issues (e.g. water and wastewater capacity and design). Improvements to infrastructure may be difficult to secure. • Post-secondary institutions in Mississauga, particularly UTM, are adjacent to some of the city’s most significant natural areas. Exemptions from the Planning Act removes the ability to ensure that the natural heritage system is protected, enhanced, restored, and expanded. 	<ul style="list-style-type: none"> • The City recommends that this policy be refined as the exemptions will challenge the ability to plan for future infrastructure and growth needs. • The proposed exemptions are overly broad, particularly where development is proposed private land or in combination with other private developments (e.g. a campus in a mall or a mixed use residential building). <p>Request to the Province:</p> <ul style="list-style-type: none"> • The Province is urged to retain Planning Act processes for post-secondary institutions proposing development on private land. • Prescribed requirements should continue to include parkland dedication. • Clarify what is meant by “publicly-assisted university.”

Proposed Changes	Potential City Impacts	Comments to the Province
	<ul style="list-style-type: none"> The City's OP has special policies for UTM that allows for broad permissions while having regard for minimizing adverse effects on adjacent areas. Blanket exemptions could have unintended consequences to surrounding residential areas and infrastructure. 	
<p>Non-Application – Community Service Facilities Exemption for community service facilities (schools, hospitals, long-term care homes) from the Act that meet prescribed requirements.</p> <p>A new section 62.0.3 of the Act authorizes regulations that provide for the non-application of any provision of the Act or a regulation made under section 70.2, or setting out restrictions or limitations with respect to its application, to prescribed classes of community service facilities that meet prescribed requirements.</p>	<ul style="list-style-type: none"> The policy would exempt all community service facilities (schools, hospitals and long-term care homes) from the Planning Act. The City's Parkland Conveyance By-law applies to schools, hospitals, and long-term care homes. These exemptions would impact the cash-in-lieu (CIL) and parkland dedication. Schools in Mississauga that are adjacent to parks have been well used. Exemptions for community service facilities from the Act would add increased pressure to the City's park system. Exemptions from the Planning Act will hinder the City's ability to regulate the Natural Heritage System and Urban Forest. 	<ul style="list-style-type: none"> The City recommends that this policy be refined as the exemptions will challenge the ability to plan for future infrastructure and growth needs. There is also concern that the development of community service facilities does not take into consideration the provision for an urban (e.g., schools situated within a tower podium, or high-rise long-term care homes). The City would support the ability to retain review of these developments but agree that an expedited review process is appropriate. The province should still have the ability to issue site-specific MZO's where warranted and allows for a municipal role in implementation. <p>Request to the Province:</p> <ul style="list-style-type: none"> A municipal role should be maintained in the review of applications for community service facilities. This would ensure issues are addressed through the appropriate process and early in the design of such facilities, avoiding costly delays Prescribed requirements should continue to include parkland dedication.

Proposed Changes	Potential City Impacts	Comments to the Province
<p>Repeal of By-Laws to Establish Water and Wastewater Allocation System Section 70.3 of the Act currently permits the making of regulations that authorize municipalities to pass by-laws establishing a system for allocating sewage and water services to land that is subject to an application under section 51. The section is repealed.</p>	<ul style="list-style-type: none"> Currently, this is a Region of Peel program. The transfer of responsibilities will determine the arrangements for water and wastewater servicing. The City would need to coordinate with the Region on servicing allocations. 	

Table 2 – Proposed Provincial Planning Statement, 2024

Proposed Changes	Potential City Impacts	Comments to Province
Provincial Planning Statement April 2024		
<p>Vision The Provincial Planning Statement (or “PPS 2024”) proposes a vision for planning in Ontario that emphasises increased housing supply with a mix of housing options and the creation of complete communities.</p> <p>The previous Growth Plan provided a regional planning focus with a clear urban structure that aligned growth with the efficient use of existing infrastructure, the creation of prosperous and strong economy, and the protection of the Greater Golden Horseshoe’s (GGH’s) fragile ecosystem has significantly changed.</p> <p>The previous vision to direct development away from areas of natural and human-made hazards would be deleted; and instead, the vision would indicate that potential risks to public health and safety or of property damage from natural and human made-hazards, including the risks associated with climate change, should be mitigated. References related to strong, liveable and healthy communities that promote and enhance human health and social well being and are economically environmentally sound have also been deleted. This has been replaced with the</p>	<ul style="list-style-type: none"> • The proposed vision focuses on the provision of market housing while diminishing the current vision for land conservation, a regional growth management concept, and protections to sustainable resource management and the natural environment. References to the conservation of biodiversity, land and resources, protection of essential biological processes, climate change response and resilience would be deleted or significantly weakened. • Mississauga supports provincial efforts to create more housing, a greater mix of housing and efforts to make home ownership and renting more affordable. • The City seeks to strike a balance between housing development and the generation of economic prosperity, the protection of the natural environment, the provision of community facilities, efficient use of infrastructure, and the preservation of cultural heritage resources. • The City continues its reconciliation efforts. The process of reconciliation entails re-evaluating standard practices that regulate municipal procedures and listening to difficult truths. The City collaborates with Indigenous communities to determine what constitutes significant engagement for them. Staff have early and frequent 	<ul style="list-style-type: none"> • The City supports efforts to increase housing supply. The City recognizes that solving the housing affordability crisis will take significant effort, bold moves from all those involved in housing approval and development, and innovative approaches to planning and construction. • Measures to expedite housing supply should balance different planning priorities. The Province should not implement measures that would generate short-term benefits while creating long-term negative impacts on the natural environment, agricultural systems, infrastructure and transit delivery, economic prosperity, and the creation of complete communities. • While it is important to create-more housing in the GGH, new developments should not undermine access to services and jobs near where residents live, and that major cost savings can be achieved by coordinating growth and infrastructure delivery. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Redefine complete communities to include "healthy, liveable and safe", or revise vision to include this language.

Proposed Changes	Potential City Impacts	Comments to Province
<p>concept of complete communities with increased access to housing, employment, schools, transportation, recreation, public spaces and services that are equitable and sustainable for all.</p> <p>Language has been included to have meaningful early engagement and relationship building between planning authorities and Indigenous communities.</p>	<p>communications and meetings with Indigenous communities, and organizations to discuss matters of mutual interest and a variety of City initiatives and projects, such as the comprehensive Official Plan Review.</p> <ul style="list-style-type: none"> The proposed vision removes reference to "healthy, liveable and safe" communities and replaces it with "complete". The complete communities definition does not explicitly reference walkability and there should be consideration for the needs of the populations to be healthy, as found by numerous health networks (e.g. the UTM Network for Healthy Populations). 	
<p>Growth Management PPS, 2024 would shift how growth planning has operated since the introduction of the 2006 Growth Plan. The elimination of growth allocations, intensification targets and minimum greenfield densities, the ability to expand settlement areas at any time, and allowing private amendments to employment areas would significantly shift how, where and when municipalities grow.</p>	<ul style="list-style-type: none"> The proposed changes could significantly increase servicing costs and create fragmented communities, while reducing achievement of creating complete communities. This could divert service improvements away from already established urban areas and growth areas, such as the Downtowns and the Major Transit Station Areas to service fragmented communities. Municipalities have limited resources for servicing and would need to optimise improvements to be cost effective. 	<ul style="list-style-type: none"> The changes would make it more difficult to align growth with infrastructure planning. <p>Request to the Province:</p> <ul style="list-style-type: none"> Carry forward policies that: <ul style="list-style-type: none"> relate to building strong, healthy communities, and managing and directing land use; and allow growth to be tied to the efficient use of existing and planned infrastructure.
<p>Planning for People and Homes Population and growth forecasts will be based on Ministry of Finance 25-year projections. Municipalities will have the option to continue using previous forecasts issued by the Province.</p> <p>Planning authorities will be required to plan for a minimum of 20 years, but not more than 30 years with planning allowed to</p>	<ul style="list-style-type: none"> The Region of Peel and the lower-tier municipalities are currently working on updating the approved 2051 Growth Forecasts to incorporate new immigration targets and the Provincial Housing Pledges, among other factors. Approved forecasts are used to plan for infrastructure delivery, transit, parks, and community services and facilities (including fire and emergency services). 	<ul style="list-style-type: none"> City staff support the Province allowing municipalities to keep using the approved growth forecast to 2051 as this forecast is already being used for infrastructure master planning. There are associated risks with using the Ministry of Finance 25-year projections to forecast growth that may not consider land supply and water and wastewater servicing

Proposed Changes	Potential City Impacts	Comments to Province
<p>extend beyond this horizon for infrastructure, public service facilities, strategic growth areas and employment areas.</p> <p>Development potential resulting from a Minister Zoning Order would be in addition to the projected forecast over the planning horizon in the Official Plan and would be required to be incorporated into official plans and associated infrastructure plans.</p> <p>Planning authorities will be required to maintain a 15-year residential land supply that is designated and available for residential development.</p> <p>PPS 2024 removes the concept of “healthy, liveable and safe communities” and instead provides that “planning authorities should support the development of complete communities.”</p> <p>It also removes considerations for: “avoiding development and land use patterns which may cause environmental or public health and safety concerns” and “promoting development patterns that conserve biodiversity.”</p>	<ul style="list-style-type: none"> In-effect Growth Plan targets would be deemed “a minimum”, which may create uncertainty and delays in infrastructure delivery (e.g. transit, parks, and community services and facilities planning). 	<p>constraints. Every municipality will be adopting their individual approaches to forecasting with the potential for inconsistencies and without considering overall growth in southern Ontario.</p> <p>Request to the Province:</p> <ul style="list-style-type: none"> Confirm what assumptions are included in Ministry of Finance 25-year projections (e.g. servicing and land supply). Provide a growth forecasting methodology to ensure consistency between municipalities. Re-insert the following policies and/or wording: <ul style="list-style-type: none"> Promoting development and land use patterns that conserve biodiversity. Avoiding development and land use patterns which may cause environmental or public health and safety concerns.
<p>Housing PPS 2024 maintains the requirement for planning authorities to establish and implement minimum affordable housing targets. It also provides a definition of affordable housing.</p>	<ul style="list-style-type: none"> The proposed policy seeks to implement minimum targets for the provision of housing that is affordable to low and moderate-income households which is consistent with the City’s approach. 	<ul style="list-style-type: none"> The City generally supports introducing residential uses on underutilized commercial and institutional sites as part of a mix of uses where appropriate, but has concerns the proposed policy does not reference a mix of uses.

Proposed Changes	Potential City Impacts	Comments to Province
<p>The definition of housing options is expanded to include laneway housing, garden suites, rooming houses, and low- and mid-rise apartments. It can also refer to a variety of housing arrangements and forms which has been expanded to include additional needs housing, multi-generational housing, student housing, culturally appropriate housing, supportive, community and transitional housing and housing related to educational uses.</p> <p>Planning authorities will need to coordinate with Service Managers to address the full range of housing options including housing affordability needs.</p> <p>Planning authorities will be required to permit and facilitate all forms of residential intensification that includes redevelopment of underutilized commercial and institutional buildings for residential uses.</p>	<ul style="list-style-type: none"> • The inclusion of range of housing options also aligns with the City’s housing strategy and implementation of Increasing Housing Choices in Neighbourhoods study. • The inclusion of the definition of affordable housing and requirement to establish and work towards meeting affordable housing targets would help to secure affordable housing. The policy provides more clarity and transparency of Provincial direction to municipalities to plan for affordable housing. • The proposes policy language to permit and facilitate residential development on these sites, has no corresponding reference for a continued mix of uses. These sites provide residents with access to services and amenities within their communities, and their loss would be contrary to the goal of building walkable, mixed-use communities. The policies are silent on the replacement of existing non-residential uses. The City has policies requiring the replacement of existing commercial gross floor area (GFA) when redevelopment of commercial sites occurs. 	<p>Request to the Province:</p> <ul style="list-style-type: none"> • Policies should direct non-residential floor space on commercial sites be retained as part of any future redevelopment wherever possible. • Policies permitting and facilitating residential development of underutilized commercial and institutional sites should include <u>as part of a mix of uses</u> that supports the achievement of complete communities. • Include minimum affordable housing period of 25 years for rental and up to perpetuity for ownership. • Define what is meant by “underutilized” in reference to industrial and commercial sites and "equitable housing” (e.g. equitable access to affordable housing? If so, how?).
<p>Settlement Areas and Settlement Area Boundary Expansions</p> <p>Planning authorities will no longer be required to achieve a minimum density target for development in new greenfield developments. Large and fast growing municipalities (a defined term) will only be encouraged to plan for a minimum target of 50 people plus jobs per hectare (PPJ/ha). No intensification target has been included.</p>	<ul style="list-style-type: none"> • The proposed changes would result in urban sprawl that increases servicing costs and may create fragmented development, while reducing the opportunity of creating complete communities. This could divert improvements away from already established built up areas (e.g. SGAs and MTSAs). Municipalities have limited resources for servicing and would need to optimize resources to be cost effective. 	<ul style="list-style-type: none"> • The proposed removal of minimum density requirements for greenfield development may result in fewer homes being built. The development industry has demonstrated that they can build new greenfield communities in excess of current mandated minimums in the Growth Plan. • Allowing residential growth in areas not planned for would affect a municipality’s ability

Proposed Changes	Potential City Impacts	Comments to Province
<p>When making a decision on settlement boundary expansions, planning authorities will consider a list of criteria that includes: the need for additional land, infrastructure and public service facility capacity, impacts on specialty crop areas and prime agricultural areas, and the phased progression of urban development.</p> <p>Planning authorities should establish and implement phasing policies, where appropriate, to ensure development is orderly and aligns with the timely provision of infrastructure and public service facilities.</p>	<ul style="list-style-type: none"> This may dilute intensification and growth focused in Strategic Growth Areas such as MTSAs. If growth is being redirected elsewhere, the achievability of minimum targets within MTSAs will be more challenging. This does not appear to be aligned with strategic investments in infrastructure (e.g. transit, servicing). 	<p>to optimize resources including unplanned social and physical infrastructure upgrades.</p> <p>Request to the Province:</p> <ul style="list-style-type: none"> Carry forward settlement boundary expansion criteria in the Growth Plan (i.e. section 2.2.8). Retain policies requiring municipalities to create intensification strategies, focusing growth and intensification in SGAs, establishing minimum intensification targets, and requiring new development to occur adjacent to existing built up areas. Retain requirement for a minimum greenfield density target to facilitate the achievement of complete communities; while avoiding the need to develop on natural areas and prime agricultural land.
<p>Municipal Comprehensive Review (MCR) The Growth Plan requirement for MCRs of official plans has not been carried forward for settlement boundary expansions and employment area conversions.</p> <p>There is no limitation on the ability of landowners to request a settlement boundary expansion and employment conversion. With proposed Bill 185 changes to the Planning Act, landowners will now be able to appeal a refusal of a settlement boundary expansion request.</p>	<ul style="list-style-type: none"> Currently, settlement area expansions and the removal of lands from employment areas can only occur through an MCR process based on criteria within the Growth Plan. These occur every 5 to 10 years. The proposed approach to the expansion of settlement areas may jeopardize planned growth within existing urban areas. Un-coordinated urban expansions at lower densities would not maximize the use of existing and planned infrastructure, would make it difficult to create complete communities, and may have more negative impacts on the natural environment, agricultural lands and resources. 	<ul style="list-style-type: none"> Eliminating the requirements of an MCR may have negative impacts on how municipalities plan for infrastructure, job creation and for employment lands protections. <p>Request to the Province:</p> <ul style="list-style-type: none"> The Province is urged to maintain a comprehensive review process for evaluating settlement area expansions and the removal of lands from employment areas. The Municipal Comprehensive Review (MCR) process allows conversion and settlement expansion requests to be assessed in totality with reference to growth forecasts, changes in land supply,

Proposed Changes	Potential City Impacts	Comments to Province
	<ul style="list-style-type: none"> The proposed changes would allow requests for lands to be converted at anytime through the development application process. Given the scope of analysis typically required, a mandated timeline of 120 days for official plans amendments may not facilitate the best planning advice. Council and staff will need to be prepared to deal with conversion requests on an ongoing basis without the benefit of understanding cumulative impacts. Converting employment land can lead to land value escalation making it more difficult for businesses to locate and expand in the city. 	<p>trends in employment space and market conditions.</p> <ul style="list-style-type: none"> The Province should maintain the existing approach that conversions only be considered through a comprehensive approach that occurs at least every 5 years, while allowing municipally-initiated amendments at any time.
<p>Employment Currently, requests to remove lands from employment areas can only be made through the Municipal Comprehensive Review process that occurs every 5 to 10 years. The proposed changes would not require a Municipal Comprehensive Review and instead, allow for private amendment requests at any time to remove lands from employment areas. Provincially significant employment zones have not been carried forward in the draft PPS 2024.</p> <p>Planning authorities will be prohibited from allowing retail and office uses in employment areas unless they are associated with the primary employment use (e.g. manufacturing). This is in line with recent updates to the Planning Act definition of Employment Areas that were passed in 2023 (but not yet in force).</p>	<ul style="list-style-type: none"> Employment areas provide land for diverse employment uses (i.e. industrial, office, retail) to meet current and future needs, and residential development is currently not permitted. Staff and landowner-initiated requests for conversion occur when the Region’s Official Plan is updated typically every 5-10 years (Municipal Comprehensive review or MCR). The conversion requests can be assessed in totality with reference to growth forecasts, changes in land supply, trends in employment space and market conditions. In Mississauga’s case, there is enough residential land already available to more than double the number of housing units in the city, well above provincial targets. The proposed changes to employment policies generally move towards reviews conducted on site-by-site basis. This will almost certainly lead to land speculation making it more expensive and complex (e.g. land-use compatibility concerns) for potential businesses to locate or expand in these areas. 	<ul style="list-style-type: none"> The Province’s proposed modifications to how municipalities plan for employment may have long-term, unintended consequences. <p>Request to the Province:</p> <ul style="list-style-type: none"> Maintain the MCR process for the removal of lands from employment areas. The MCR allows for a holistic approach to employment planning, and helps avoid unintended consequences to industry, and commercial development. Allow small-scale office and retail services that complement and strengthen the function of the employment areas and provide services and amenities to the employees in those areas (e.g., essential office and retail uses such as restaurants, pharmacies, medical offices, etc.). They should also allow for commercial uses where other PPS policies do not permit sensitive land uses (e.g. adjacent to the

Proposed Changes	Potential City Impacts	Comments to Province
<p>Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. Planning authorities shall also maintain land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.</p> <p>PPS 2024 does not carry forward language requiring separation or mitigation of sensitive land uses from heavier employment uses in employment areas.</p> <p>Planning authorities would be permitted to remove lands from an employment area subject to demonstrating several tests. The tests are as follows:</p> <ul style="list-style-type: none"> a) there is an identified need for the removal and the land is not required for employment area uses; b) the proposed uses would not negatively impact the overall viability of the employment area by: <ul style="list-style-type: none"> 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts; 2. maintaining access to major goods movement corridors; c) existing or planned infrastructure and public service facilities are available; and d) the municipality has sufficient employment lands to accommodate 	<ul style="list-style-type: none"> • While there are some strategic opportunities for conversions, the process should be rigorous and comprehensive. Many areas where non-residential uses are present do not have proper servicing (schools, parks etc.) for residential development and are generally inferior locations compared to existing vacant or underutilized mixed-use sites. While increasing housing supply is vital, it does not have to occur at the expense of future economic growth. • Through Bill 97, the Province changed how employment areas are defined by removing commercial uses such as office and retail, while allowing municipalities to bring forward policies permitting these uses where they are lawfully established. The proposed policies do not recognize that existing commercial uses (i.e. lawfully established) are permitted to continue. • The employment land definition is overly restrictive and does not account for how businesses rely on a mix of non-residential uses to continue to be attractive places for investment. Commercial uses in employment areas offer several benefits: <ul style="list-style-type: none"> ○ provide access to services and amenities that support the wider employment area – e.g. restaurants, print shops, banks, courier services, etc; ○ allow for a transition along the edges of employment areas between major facilities and nearby residential communities; ○ make sites more attractive to companies and their employees and assist in employee attraction and retention; and 	<p>Airport), or where they provide a transition to nearby residential communities.</p> <ul style="list-style-type: none"> • Policies should recognize commercial uses may continue to be permitted where they are lawfully established as per Bill 97. • Conduct more in-depth analysis and consultation with industry leaders before approving changes to employment policies. • Clarify the Province’s intent for employment lands outside of employment areas. Request policies distinguish between primary and secondary uses for these lands. The City relies on employment lands as part of its economic development strategy, and it is important that the primary use continue to be protected for employment to ensure a balanced mix of jobs and residents. Having this distinction would still allow for PPS policies that require municipalities to permit a mix of secondary uses on those lands, including residential. • In order to support the creation of complete communities, the PPS should clarify that when redevelopment of existing commercial buildings occurs, commercial and office GFA should be replaced, wherever possible. The loss of these uses would reduce the range of amenities and services that residents enjoy in their community, and eliminate jobs near where they live.

Proposed Changes	Potential City Impacts	Comments to Province
<p>projected employment growth to the horizon of the official plan.</p>	<ul style="list-style-type: none"> ○ accommodate office uses that are often along transit corridors and contribute towards transit ridership. ● Redeveloping commercial lands in employment areas with sensitive land uses could have negative implications for industry. Commercial lands are often located near the edges of employment areas in-between industry and nearby residential areas. They can also be located in the middle of an employment area where their removal may impact the overall integrity and viability of the remaining employment area. These lands provide access to small-scale retail that support the wider employment area – e.g. restaurants, print shops, medical office, banks, etc. Through our engagements with industry, they have expressed concerns that allowing sensitive land uses in close proximity may have cost and risk implications to their operations. ● Existing Office and mixed-use buildings located in employment areas accommodate many uses, which may be impacted by the proposed policy changes. Restricting office and commercial uses may impact a landowner’s ability to attract new tenants. 	
<p>Strategic Growth Areas PPS 2024 brings forward several concepts from the Growth Plan including Strategic Growth Areas and Major Transit Station Areas (MTSAs). However, it removes the concept of Urban Growth Centres (UGC). Planning authorities will no longer be required to identify and focus growth in</p>	<ul style="list-style-type: none"> ● The proposed policies that support redevelopment of commercially-designated retail lands to mixed-use residential are silent on the replacement of existing non-residential uses. The City currently has policies requiring the replacement of existing commercial gross floor area (GFA) when redevelopment of commercial sites occurs to accommodate a range and mix of land uses. 	<ul style="list-style-type: none"> ● Comments provided under Housing on the development and redevelopment of underutilized commercial sites is also applicable to this section. <p>Request to the Province:</p> <ul style="list-style-type: none"> ● Retain Provincially delineated UGCs which could be modified through a municipal comprehensive review.

Proposed Changes	Potential City Impacts	Comments to Province
<p>strategic growth areas. Instead, they will only be encouraged to identify and focus growth in such areas.</p> <p>Planning authorities should prioritize planning and investment in infrastructure in strategic growth areas, identify the appropriate type and scale of development, permit development and intensification to support achievement of complete communities, consider a student housing strategy and support redevelopment of commercially-designated retail lands to support mixed-use residential development.</p> <p>PPS 2024 proposes to carry forward the MTSA framework from the Growth Plan including requirements for delineation of MTSA boundaries and minimum density targets. Planning authorities will be required to delineate MTSA boundaries on higher order transit corridors through new official plan policies adopted under section 26 of the Planning Act.</p> <p>Planning authorities will be encouraged to promote transit-supportive development within MTSA's by supporting the development of surface parking lots, including commuter parking lots.</p> <p>Additional policy language is proposed to encourage multi-modal access to stations and connections to nearby major trip generators, accommodate a range of</p>	<ul style="list-style-type: none"> • The removal of UGCs does not include a clear definition of downtowns which may impact the City's ability to secure parkland in these areas based on the existing Parks Plan and the Parkland Conveyance By-law. • Changes to SGA policies and definitions may not align with the City Structure and the established urban hierarchy of densities as set out by the Official Plan. • Mississauga would also be required to plan for intensification on lands that are adjacent to existing and planned frequent transit corridors where appropriate. Frequent transit corridors are defined as "a public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week." The implications of this proposed change is unclear. • The definition for SGAs now includes lands adjacent to publicly assisted post-secondary institutions. The addition this wording is a concern because it does not consider local context and these areas may not always be suitable for these uses. 	<ul style="list-style-type: none"> • Provide a definition for Downtowns that recognizes these are created through an Official Plan review and/or Provincially delineated UGC. • Reconsider implications of policy 2.4.3. on frequent transit corridors: <ul style="list-style-type: none"> ○ This policy is too broad and may compete with a municipality's ability to attract development in MTSA's and Downtowns. ○ Clarify, the "where appropriate" provides flexibility for municipalities to determine which, if any, frequent rapid transit corridors should be included in a SGA. ○ Clarify what is meant by adjacency and transit frequency as it varies according to many factors such as: changes in the seasons, overall ridership, and transit networks. A frequent local bus route is not as fixed as a higher-order transit line and may not always support intensification. • Consider including policies on the following: <ul style="list-style-type: none"> ○ Focusing growth in SGAs (e.g. UGC, MTSA) where infrastructure investments (e.g., transit) would be optimized and where there are more opportunities to create complete communities. If growth is being redirected elsewhere, the achievability of minimum targets within SGAs such as MTSA's would be more challenging.

Proposed Changes	Potential City Impacts	Comments to Province
<p>mobility needs and support active transportation.</p> <p>Planning authorities will now be required to plan for intensification on lands that are adjacent to existing and planned frequent transit corridors where appropriate.</p>		<ul style="list-style-type: none"> ○ Identifying, planning for, and directing growth to, urban growth centres. Most large municipalities have already centered their growth and infrastructure planning priorities towards developing their urban growth centres into complete communities. ● Revise the definition of SGA to remove “lands adjacent to publicly assisted post-secondary institutions”. ● Policies 2.4.2.6 and 2.4.2.7 appear to be duplicate policies and may need to be deleted. ● Consider policies for shared parking between GO commuters and new/adjacent development within MTSAs.
<p>Infrastructure</p> <p><u>General</u> Public service facilities should be planned and co-located with one another, along with parks and open space where appropriate. Planning authorities in consultation with school boards should consider and encourage innovative approaches in the design of schools and associated child care facilities (e.g. integrate schools in high-rise buildings).</p> <p><u>Transportation</u> PPS 2024 deletes policy promoting a land use pattern, density and mix of uses that minimize the length and number of vehicle</p>	<ul style="list-style-type: none"> ● The proposed policies may encourage more development for schools in mixed use buildings. ● There are many parks in Mississauga that are located adjacent to schools, and Mississauga has shared-use agreements with school boards to provide for community access to facilities either partially or fully located on school board lands, where appropriate. ● As parkland acquisition is opportunity driven, co-locating with public service facilities is not always possible or desired, and may result in limited access to a park by the public on certain times and days of the week. 	

Proposed Changes	Potential City Impacts	Comments to Province
<p>trips and support current and future use of transit and active transportation.</p> <p><u>Sewage and Water Services</u> Planning for sewage and water shall consider opportunities to re-allocate if necessary unused system capacity to meet current and projected needs for increased housing supply.</p>		
<p>Airports Stronger policy language is proposed from <u>discouraging</u> to <u>prohibiting</u> land uses which may cause a potential aviation safety hazard. <i>Note: This is a change from the first draft PPS (2023) and current PPS (2020).</i></p>	<ul style="list-style-type: none"> • Toronto-Lester B. Pearson Airport (Airport) continues to serve a significant role for economic growth, creating business and employment opportunities, tourism, and in facilitating the movement of goods - regionally, nationally and internationally. • The City's Official Plan policies recognize that new construction can potentially impact the airport or airspace capacity and has policies to ensure that new construction is compatible with the requirements of the Airport. The proposed PPS 2024 change would require a minor amendment to the official plan. 	<ul style="list-style-type: none"> • The City supports the Province's proposal to have stronger policy language prohibiting land uses which may cause a potential aviation safety hazard.
<p>Land Use Compatibility Planning authorities would no longer need to demonstrate that there are no alternative locations for a proposed sensitive land use where encroachment may occur adjacent to planned industrial, manufacturing and other uses.</p> <p>Proposed adjacent sensitive land uses would only be required to demonstrate potential impacts to heavier employment uses are minimized and mitigated in accordance with provincial guidelines.</p>	<ul style="list-style-type: none"> • The proposed changes to employment area and land use compatibility policies may make it easier to locate sensitive land uses in closer proximity to industrial uses. Reducing requirements for separation and transition may threaten the viability of industry in employment areas and lead to negative impacts on public health and safety. • By weakening these policies, sensitive land uses, including schools and new residential high rise buildings, could more easily be built in proximity to industry. More burden would be placed on industrial operators to demonstrate compliance with 	<p>Request to the Province:</p> <ul style="list-style-type: none"> • The Province should re-emphasize avoidance as opposed to mitigation for development proposing sensitive land uses adjacent to major facilities. The proposed policies appear to place the burden on industry through regulatory approvals, which may frustrate their ability to continue to operate or expand. • The policies should also be strengthened to ensure an appropriate separation and transition between heavier employment uses and sensitive land uses is achieved.

Proposed Changes	Potential City Impacts	Comments to Province
	<p>Provincial guidelines related to minimizing and mitigating impacts to nearby sensitive land uses. This has risk and cost implications for industrial operators, particularly when expansions are proposed, and in some cases, businesses may find that their location is no longer viable.</p> <ul style="list-style-type: none"> • The proposed changes would weaken the ability of municipalities to ensure development does not result in land use compatibility issues, and avoid adverse impacts to human health and safety. • Employment Land conversion outside of a comprehensive process can significantly fragment these lands and impede industries' ability for future expansions and growth. It encourages encroachment of sensitive uses closer to industrial ones by eliminating commercial uses which tend to act as buffers. It also impacts the municipality's ability to optimally and wisely plan for infrastructure and social services for areas that were not intended to permit sensitive uses, and does not allow for the planning of complete connected communities. • The policies emphasise minimizing and mitigating where avoidance is not possible for the introduction of sensitive land uses. This would make it easier to locate sensitive land uses (e.g. residential) in closer proximity to major facilities. As a result, industry may be exposed to more nuisance-related complaints and face additional regulatory burdens. This may impede industries' ability to expand in the future. 	<ul style="list-style-type: none"> • Reinstate policies in section 1.2.6.2 of PPS 2020 on land use compatibility.
Natural Heritage	<ul style="list-style-type: none"> • The mapping of natural heritage features would now become a municipal responsibility based on 	<ul style="list-style-type: none"> • The City supports the retention of the Natural Heritage policies.

Proposed Changes	Potential City Impacts	Comments to Province
<p>No significant changes to the natural heritage policies except to definitions. However, natural heritage system mapping and associated policies have not been carried forward from the Growth Plan. This may weaken protections for natural heritage features within the Greater Toronto and Hamilton Area.</p>	<p>evaluation criteria that is to be established by the Province.</p> <ul style="list-style-type: none"> • Generally, changes can be made more easily to municipal planning policy, and there is more recourse for challenge than is the case with policies and mapping contained in provincial planning documents. • Changes to the definition of <i>significant</i> (a & b) regarding <i>wetlands</i> and <i>woodlands</i> would not have a direct impact on the city. However, it is unclear if the province will release any new criteria and procedures to determine a significant woodland or significant wetland as per the revised definitions. • The City would be encouraged to undertake watershed planning with the appropriate conservation authority. Watershed planning is a complicated discipline which touches on many topics (e.g. natural heritage, water and sewage, stormwater management), and may require additional resources. 	<p>Request to the Province:</p> <ul style="list-style-type: none"> • Clarify whether there are any additional/refined criteria and procedures being developed. • If the Province chooses to release criteria and procedures on significant wetlands and woodlands, the City welcomes collaboration on their development.
<p>Natural and Human-made Hazards Municipalities would be required to identify hazardous lands and hazardous sites and management of development in these areas in accordance with provincial guidance.</p> <p>PPS 2024 would remove policy requiring planning authorities to support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.</p>	<ul style="list-style-type: none"> • The City's Official Plan and Zoning By-law already identifies the location of hazards throughout the City and has policies managing development in these areas. The exact limits of development are determined during the development application process and in consultation with the appropriate conservation authority. • The On-Site and Excess Soil Regulation O. Reg. 406/19, made under the <i>Environmental Protection Act</i> would make it more restrictive to dispose of excess soil at waste management facilities by 2025. 	<ul style="list-style-type: none"> • The City supports the inclusion of policy requiring the identification of hazard lands and the management of development in these areas. The City will continue to coordinate with conservation authorities when evaluating development applications to assess the limits of development near hazard lands. • The City has no concerns with the removal of policy language regarding on-site and local re-use of excess soil.

Proposed Changes	Potential City Impacts	Comments to Province
<p>PPS 2024 also amends policy 5.3.2 to provide that sites with contaminants in land or water shall be assessed and remediated prior to any activity on the site associated with a proposed use so that there will be no adverse effect.</p>	<p>This would encourage all industries to look for ways to reuse excess soil either on-site or at other off-site properties that could beneficially re-use that soil for their own projects. Therefore, it is no longer necessary to have this wording in the PPS, which acts more as a guideline rather than an enforceable provision.</p>	
<p>Cultural Heritage and Archaeology <i>“Significant”</i> terminology has been deleted from <i>“built heritage resources”</i> and from <i>“cultural heritage landscapes”</i>. New term introduced: <i>“Protected heritage property”</i>.</p> <p>Planning authorities are encouraged to develop and implement archaeological management plans and proactive strategies for identifying properties for evaluation under the <i>Ontario Heritage Act</i>.</p> <p>PPS 2024 carries forward the PPS 2020 requirements for early engagement with Indigenous communities and ensuring their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.</p>	<ul style="list-style-type: none"> Proposed changes would have a limited effect on the City. The City is presently in the process of implementing an archaeological management plan. 	<p>Request to the Province:</p> <ul style="list-style-type: none"> Clarify the meaning of “proactive strategies” in regards to identifying properties for evaluation under the <i>Ontario Heritage Act</i>. Will there be an opportunity to discuss examples? Additionally, would this language apply only to archeology or to all historic properties? Clarify engagement requirements with Indigenous communities. What is meant by “ensuring interests are considered” and what is the expectation of municipal staff? Policies on engagement with Indigenous communities should be clarified to facilitate more substantive municipal-Indigenous relationships.
<p>Implementation and Interpretation Municipalities will be required to keep zoning by-laws up-to-date with their Official Plans and the PPS by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.</p>	<ul style="list-style-type: none"> Bill 185 removes the Region’s planning authority on July 1, 2024. Based on this date the Province would be the approval authority of the City’s new Official Plan. Implementation provisions require that all planning decisions (even for applications submitted under the previous regime) be consistent with the PPS, 2024, (once it is adopted) even if the Official Plan has not 	<ul style="list-style-type: none"> Each Official Plan conformity exercise requires a significant amount of resources for staff to conduct research, policy development and engage with Council, Indigenous communities, community, and stakeholders. The City is at the final stage of completing its 10-year Official Plan Review. Having to review the City’s Official Plan again and in a short time frame to be consistent with a new PPS would require

Proposed Changes	Potential City Impacts	Comments to Province
<p>Where a planning authority must decide on a planning matter before their official plan has been updated to be consistent with the PPS, or before other applicable planning instruments have been updated accordingly, it must still make a decision that is consistent with the PPS.</p> <p>Policy removed that official plans are the most important vehicle for implementation of PPS policies. (still retained in Preamble)</p> <p>PPS 2024 carries forward language from the Growth Plan that density targets represent minimum standards and planning authorities are encouraged to go beyond these targets where appropriate, except with doing so would conflict with other provincial policy.</p>	<p>been updated. Staff are in the process of updating the City’s Official Plan to bring it into consistency/conformity with Provincial plans and policies. A new PPS may delay this process, and cause uncertainty in the review of development applications in the interim.</p>	<p>additional time and resources. In addition, the period in-between conformity could create more uncertainty for development and could impact the success of several City planning initiatives.</p> <p>Request to the Province:</p> <ul style="list-style-type: none"> • Policies should include a transition extending the timeline for the completion of official plan reviews to address changes to be consistent with the proposed PPS. • Restore the policy that the official plan is the most important vehicle for implementation of this PPS and that comprehensive, integrated and long-term planning is best achieved through official plans.
<p>Coordination</p> <p>Planning authorities shall collaborate with publicly-assisted post-secondary institutions to facilitate student housing that considers the full range of housing options nearby to meet current and future needs. Planning authorities shall collaborate with these institutions in the development of a student housing strategy that includes consideration of off-campus housing targeted to students.</p> <p>PPS 2024 proposes to strengthen policy language with an explicit requirement for “early” engagement with indigenous communities and to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision making and</p>	<ul style="list-style-type: none"> • The City has developed and implemented a comprehensive engagement framework, and has a long history of having early, meaningful and continuous communications with Indigenous communities, Service Managers, school boards, and stakeholders. However, it is difficult to negotiate with developers to secure spaces for schools through development. • The City collaborates with Indigenous communities to determine what constitutes significant engagement for them. The City has early and frequent communications and meetings with Indigenous communities, and organizations to discuss matters of mutual interest and City initiatives and projects, such as the Official Plan Review. 	<ul style="list-style-type: none"> • Mississauga welcomes the opportunity to coordinate on student housing matters with post-secondary institutions. This is reflected in our housing supply pledge – <i>Growing Mississauga</i>. In addition, the City is supportive of the local HomeShare program. However, our experience to-date has been that post-secondary institutions prefer to rely on the secondary rental market to satisfy demand. <p>Request to the Province:</p> <ul style="list-style-type: none"> • Clarify what is requested for engagement with Indigenous communities. What is meant by "ensuring interests are considered" and what is the expectation of municipal staff?

Proposed Changes	Potential City Impacts	Comments to Province
<p>support identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. PPS 2020 only requires engagement and coordination. The Growth Plan includes language on facilitating knowledge sharing.</p>	<ul style="list-style-type: none"> • Through several initiatives and studies, including the Official Plan Review, the City is making continuous efforts to engage with the public, stakeholders and equity-deserving groups. Staff would continue to have an open and transparent approach to engagement in planning matters, including the implementation of the PPS. 	<ul style="list-style-type: none"> • Policies for collaboration with school boards should also involve development industry.

Table 3 – Proposed Amendments to Ontario Regulation 73/23: Municipal Planning Data Reporting

Proposed Changes	Potential City Impacts	Comments to the Province
Ontario Regulation 73/23		
Allow municipalities to indicate when an application has been withdrawn.		
Make the registration of a plan of subdivision a “reportable action.” Currently, only applications that are submitted, decided, or appealed are required to be reported. This would make the registration a “reportable action.”		
<p>Require municipalities to provide a summary table for each planning-application type with their quarterly reports. The summary table would be posted publicly to the municipality’s webpage and would be updated each quarter. The table would include the following components:</p> <ul style="list-style-type: none"> (a) The total number of applications reported. (b) The total number of submissions. (c) The total number of municipal decisions. <ul style="list-style-type: none"> a. The % of municipal decisions that took longer than legislated timelines (where applicable). b. The total number of approved housing units for applications where the municipality approved or granted the application. 	<p>The Province is proposing regulations that would increase the frequency of reporting on development outcomes and the type of data to be included by municipalities. Staff have previously commented that data being requested by the Province is complex and difficult to interpret, and have suggested revisions and further clarification (click here). This would maximize the value of the data being collected and avoid double counting.</p>	<p>Request to the Province:</p> <ul style="list-style-type: none"> • Provide clarification and definitions for each reporting figure as noted below: <ul style="list-style-type: none"> ○ Are the total number of applications to be reported quarterly and what type of applications are to be included reporting on all land uses and all types of applications? ○ Define submissions, and is this figure referring to the number of resubmissions of each application or the total number of new applications that have been submitted from an applicant to the Municipality in the quarter? What type of applications are to be included? ○ a) Define municipal decisions and whether it is referring to the by-law enacted or is it applications approved in general/ in principle? b) If this refers to the total number of approved housing units where a municipality has approved the application, there will likely be double counting of multiple applications approved for one site within the same quarter (e.g., rezoning and Site Plan).

Proposed Changes	Potential City Impacts	Comments to the Province
<p>(d) The number of housing units proposed across all planning applications submitted during the respective quarter.</p> <p>(e) The number of applications that were for privately initiated settlement area boundary expansions.</p>		<ul style="list-style-type: none"> • Is this figure to be reported as a net new number of approved housing units within the quarter, or to indicate total numbers of approved housing units by type of application (e.g., indicate the number of units approved through different application streams such as Rezoning, Site Plans, Building Permits, etc.). ○ Clearer direction is required as there may be instances of double counting if multiple applications are submitted for one site within the same quarter (e.g., Rezoning and Site Plan). <ul style="list-style-type: none"> • Is this figure the net number of proposed housing units submitted within the quarter or the total number of submitted housing units by each application type (e.g., separate the number of units proposed through different application streams such as Rezoning, Site Plans, Building Permits, etc.)?
<p>Provide a copy of the municipality's geospatial data that identifies designated serviced land supply.</p>		