

---

**REPORT TITLE:** **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

**FROM:** Andrew Farr, Interim Commissioner of Public Works  
Adrian Smith, Interim Chief Planner and Director, Regional Planning and Growth Management

---

## **RECOMMENDATION**

**That the comments on proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe, outlined in the report of the Interim Commissioner of Public Works and the Interim Chief Planner and Director, Regional Planning and Growth Management, titled “Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe”, be endorsed;**

**And further, that a copy of the subject report be forwarded to the City of Brampton, the Town of Caledon, the City of Mississauga and the Ministry of Municipal Affairs and Housing.**

## **REPORT HIGHLIGHTS**

- On June 16, 2020, the Ministry of Municipal Affairs and Housing (the Ministry) released two documents that propose changes to A Place to Grow – Growth Plan for the Greater Golden Horseshoe, 2019.
  - This report includes a summary of the key Provincial proposed changes, preliminary implications and comments for planning at the Region of Peel.
  - The proposed amendments and evolving provincial planning context will require some adjustments to the current Peel 2041: Official Plan Review, including growth management and Settlement Area Boundary Expansion focus area work.
  - A detailed staff level response to the Ministry is attached as Appendix I.
- 

## **DISCUSSION**

### **1. Background**

On June 16, 2020 the Ministry of Municipal Affairs and Housing (the Ministry) released two documents that propose changes to A Place to Grow – Growth Plan for the Greater Golden Horseshoe, 2019. These proposed changes were released through the Environmental Registry of Ontario (ERO) website, as follows:

- Proposed Amendment #1 to A Place to Grow Growth Plan for the Greater Golden Horseshoe (Schedule 3 Population and Employment Forecasts) - ERO 019-1680.
- Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe – ERO 019-1679.

## **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

The Province advises that the proposed changes are intended to provide municipalities with more flexibility to respond to demographic, employment, market demand, and housing affordability trends in the Greater Golden Horseshoe (GGH). The following changes are proposed:

- Extends the planning horizon from 2041 to 2051;
- Three growth outlooks are provided for consideration (low, reference and high). The reference forecast directs an additional 310,000 people and 100,000 jobs to Peel by 2051;
- Upper-tier municipalities may use higher growth forecasts for planning and managing growth;
- Simplifies the approach to calculating the amount of land needed to accommodate new growth;
- Permits the conversion of Provincially Significant Employment Zones outside of a municipal comprehensive review if the lands are within a Major Transit Station Area;
- Allows for new aggregate resource extraction in endangered and threatened species habitats;
- Introduces new definitions and consistency with the Provincial Policy Statement, 2020;
- Required consultation with Indigenous communities to implement the plan; and,
- Proposed amendments maintain the existing July 2022 Provincial conformity deadline.

This report highlights the key proposed changes, identifies potential implications, and staff level comments and recommendations. Appendix I provides more detail regarding the proposed changes and staff comments, which were submitted to the Ministry by the commenting deadline, July 31, 2020 (45-day comment period).

The proposed amendments will have an impact on the current Peel 2041 Official Plan Review work and other program areas, that utilize the growth forecasts to support program planning and service delivery. The impacts include the allocation of new growth to the local municipalities, additional lands needed through the Settlement Area Boundary Expansion work, and the assessment of infrastructure capacity to accommodate the forecasted growth to 2051.

### **2. Overview of Proposed Policy Changes, Implications and Response**

This section provides highlights of the key changes proposed in Amendment #1 and Proposed Land Needs Assessment Methodology, 2020, and identifies key implications and recommendations. Detailed technical comments and staff recommendations are provided in Appendix I.

#### **New Planning Horizon to 2051**

The proposed amendment would extend the planning horizon from 2041 to 2051 to support long term planning over a 30-year period. Municipalities would be required to plan to the year 2051, as a part of their current official plan and municipal comprehensive reviews.

Staff support the extension of the planning horizon to 2051 to accommodate the long-term planning and management of growth.

## **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

### **Growth Scenario Outlook**

The proposed amendment provides three growth outlooks for consideration (low, reference, and high). Based on the Provincial Technical Background document associated with the 2051 forecasts, the analysis supports the reference scenario as the most likely outlook utilizing the best information available, which is consistent with long term comprehensive planning.

In order to accommodate the growth forecast provided by the Province, the timely investment and delivery of key transportation infrastructure such as the GTA West Transportation Corridor, as well as provincial and regional transit initiatives will be required to support planning for employment and complete communities.

Staff support the reference scenario in Appendix II – Mock B as the recommended forecast. This is supported along, with additional Provincial policy direction for municipal authority to manage the staging and sequencing of new growth in a financially sustainable manner ensuring the development of complete communities.

### **Minimum Schedule 3 Forecast**

The proposed amendment would update policies to refer to the Growth Plan Schedule 3 forecasts as minimums for planning and managing growth. Upper- and single- tier municipalities would have the option to develop population and employment growth forecasts beyond what is prescribed on Schedule 3, through a municipal comprehensive review process.

Staff have concerns associated with the Schedule 3 forecast set as a minimum. This policy approach has the potential for municipalities to see great pressure to make non-evidence-based planning decisions for long term growth.

Staff suggest a policy reference be added, if flexibility beyond Schedule 3 is desired, which would permit municipalities to undertake a comprehensive and evidenced based approach linked to a consistent Land Needs Assessment Methodology to determine if additional growth needs are required beyond the Schedule 3 reference scenario, but not exceeding the high scenario.

In addition, given the higher growth and longer planning horizon, the Region also encourages the Province to consider strengthening municipal authority to impose strong staging and sequencing requirements through the planning and development process, in order to carefully manage growth that delivers complete communities and financial sustainability.

### **Provincially Significant Employment Zones and Major Transit Station Areas**

Proposed policies provide flexibility that allows Provincially Significant Employment Zones (PSEZ) within Major Transit Station Areas to be converted to non-employment uses outside of a municipal comprehensive review. Previously there was no flexibility to convert PSEZ lands outside of a municipal comprehensive review. Staff support this increased flexibility.

## **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

### **Transition to 2051**

Proposed Amendment #1 does not include any transition for incorporating the new 2051 planning horizon and updated Schedule 3 forecasts, as a part of the current municipal comprehensive review, which has a conformity deadline of July 1, 2022.

If no transition is provided, it is recommended that the Province expedite the release of the final Amendment #1 and Land Needs Assessment Methodology to allow municipalities sufficient time to plan to the 2051 horizon.

### **Mineral Aggregate and Resources**

The proposed policy would remove the prohibition of new mineral aggregate operations and new wayside pits and quarries being established in habitats of endangered and threatened species within the Natural Heritage System for the Growth Plan. The Natural Heritage System for the Growth Plan only affects three small areas in Peel. The majority of Peel's mineral aggregate resources is located in the Greenbelt, which is not affected by the proposed policy changes to the Growth Plan Natural Heritage System.

Although the effect of this policy is limited in Peel, the Province is strongly encouraged to continue to protect endangered and threatened species in accordance with permitting and approval requirements under the *Endangered Species Act*, and by restricting proposed areas of disturbance for aggregate resources extraction adjacent to key natural heritage features and key hydrologic features.

### **Indigenous Communities Engagement**

The proposed amendments strengthen policies around Indigenous engagement (from "encouraged" to "shall"), in terms of coordinating planning matters with Indigenous communities. Other proposed changes include removing references to First Nations and Metis, in order to capture the broader and more consistent reference of Indigenous communities.

It is recommended the Province provide guidance materials on what is considered an appropriate level of engagement, in order to assist municipalities in facilitating engagement and share best practices on how to engage indigenous communities.

### **Proposed Land Needs Assessment Methodology for A Place to Grow Growth Plan for the Greater Golden Horseshoe**

A new simplified approach has been outlined for municipalities to determine the amount of additional housing units and jobs required to meet market demand in conformity with the Plan. The formal methodology previously issued by the Province is proposed to be removed and replaced with general guidance to support a more outcome-based method.

The Region of Peel supports efforts to deliver a consistent and transparent approach to determining the Land Needs Assessment, in accordance with the Growth Plan, 2019.

## **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

The proposed Land Needs Assessment Methodology has a more streamlined approach and provides flexibility to account for local conditions. However, it lacks the definitive direction required to enable a consistent methodology to be applied across the Greater Golden Horseshoe.

Staff recommend a structured and documented approach to the Land Needs Assessment that outlines the required steps, inputs, and data sources to be utilized for each required component.

### **3. Regional Work Plan Implications, Potential Risks, and Next Steps**

#### **Peel 2041: Official Plan Review Work Program**

The proposed amendment and Land Needs Assessment will have an impact on the current Peel 2041: Regional Official Plan and Municipal Comprehensive Review. The current Official Plan Review, including allocation of growth is based on a planning horizon to 2041. However, Regional staff have endeavored to retain a flexible process given the anticipated Provincial consideration of increased population for Peel and an extended planning horizon.

The impact of the new growth allocations will need to be considered, as it relates to the current Peel 2041: Regional Official Plan Review focus areas. For example, the new forecasts and Land Needs Assessment Methodology will mean that additional lands will be required, as part of the settlement area boundary expansion (beyond the 1,300 hectares originally anticipated). It is possible that the anticipated December 2020 date for providing staff recommended settlement boundary details will be delayed by several months. Regional staff are working closely with local municipal partners to capitalize on past growth scenario work and endorsed growth forecast, to address the new Provincial proposed Amendment #1 directions. Additional technical analysis is required to determine how the new forecasted growth will be accommodated in Peel, including a local municipal allocation.

Further, in order to address the changing planning horizon of the forecast. the communication approach for the Peel 2041: Regional Official Plan Review and Municipal Comprehensive Review will undergo some slight adjustments. The Peel 2041 brand has begun to reference Peel 2041+ to raise continued awareness of anticipated changes to the planning horizon. When the Province makes a final decision on the planning horizon, Peel 2041+ will be changed accordingly (i.e. to Peel 2051). Also, staff will continue to monitor Provincial announcements, to assess whether further adjustments to the Peel 2041 work plan will be needed.

#### **Potential Risks**

Staff continue to manage the potential risks associated with this uncertainty in Provincial direction, while meeting the conformity deadline of July 1, 2022.

However, should the Province delay the release of the final Amendment # 1 and Land Needs Assessment, this may have implications on Peel 2041 related major bodies of work including: Major Transit Station Area, housing, transportation, employment land and growth management planning; delays to proceeding with Settlement Area Boundary Expansion recommendation; potential impact to meeting the Provincial conformity deadline; affect the ability to hold comprehensive consultation with stakeholders, implications for advancing

## **Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

local municipal priorities (such as City of Brampton's 2040 Vision, Town of Caledon's Official Plan Review, and City of Mississauga's strategic city building initiatives); and anticipated risk to informing infrastructure and financial decisions to 2051.

In our comments to the Province, staff have recommended an expedited release of final forecasts and land needs assessment. In addition, staff continue to work with the Province to encourage an accelerated Provincial direction, in order to mitigate the risks noted above.

### **Growth Management Program**

The Region's Growth Management Program was established to implement an integrated approach to planning, servicing and financing growth in Peel. An update to the Region's growth forecast will impact the Program's integrated work plan and influence future infrastructure decision-making in order to minimize the Region's debt risk.

A new growth forecast to the 2051 horizon will require updates to the Region's Master Plan's (including the Water and Wastewater Master Plan and Long-Range Transportation Plan), in order to meet the infrastructure requirements of projected growth. Through the Program's integrated approach, new growth allocation scenarios will need to be developed and integrated into the master plan process. The updated plans will serve as the basis for infrastructure programming and capital budget needs and is a primary input to future updates of the Region's development charge policies and background study.

The development of updated Plan's will be undertaken through an iterative process in support of the principles of Program. This includes maintaining the principle that growth pays for growth, aligning the timing of infrastructure projects with actual growth, and maximizing the use of existing infrastructure. This process will include extensive consultation with internal staff and external stakeholders, such as the local municipalities and members of the Building Industry and Land Development Corporation (BILD) through the Program's committee structure.

## **FINANCIAL IMPLICATIONS**

There are no direct financial implications associated with this report. Any future considerations as a result of any updates required to the Regional Official Plan will be included in future budget submissions.

## **APPENDICES**

Appendix I - Staff Comment letter to the Province on proposed Amendment #1 to A Place to Grow and Land Needs Assessment Methodology, 2020

Appendix II - Detailed Forecast Summary and Comparison, prepared by Hemson Consulting for the Ministry of Municipal Affairs and Housing

---

*For further information regarding this report, please contact Adrian Smith, Interim Chief Planner and Director of Regional Planning and Growth Management, Ext. 4047, [Adrian.smith@peelregion.ca](mailto:Adrian.smith@peelregion.ca).*

*Authored By:* Naheeda Jamal, Acting Manager and April Fang, Intermediate Planner

**Comments on Proposed Amendment #1 and Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

*Reviewed and/or approved in workflow by:*

Department Commissioner, Division Director and Financial Support Unit.

Final approval is by the Chief Administrative Officer.

A handwritten signature in black ink that reads "Nancy Polsinelli". The signature is written in a cursive style with a large initial "N" and a distinct "P".

---

N. Polsinelli, Interim Chief Administrative Officer