



## REPORT FOR ACTION

# Provincial Planning Statement 2024 Consistency Exercise Phase 1 - Recommendation Report

**Date:** October 16, 2025

**To:** Planning and Housing Committee

**From:** Chief Planner and Executive Director, City Planning

**Wards:** All

### **SUMMARY**

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The new Provincial Planning Statement 2024 (PPS 2024) came into effect on October 20, 2024, and replaced the previously issued Provincial Policy Statement 2020 (PPS 2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 (Growth Plan). Through the Planning Act, the City is required to ensure that the Official Plan is consistent with the PPS 2024.

This report is the first of a two-phased PPS 2024 Consistency Exercise to bring forward Official Plan Amendments to ensure consistency between the new PPS 2024 and the City's Official Plan. Phase 1 focuses on addressing policy conflicts between the Official Plan and the PPS 2024. This report concludes Phase 1 and recommends approval of OPA 846.

Through Phase 1, the City has identified six areas of policy conflict that are recommended to be addressed through Official Plan Amendment 846:

1. Population and Employment Growth Forecasting
2. Transit and Mobility Hubs
3. Urban Growth Centres
4. Former Provincial Plans
5. Heritage and Archaeology
6. Municipal Comprehensive Review
7. Land Use Compatibility

Phase 2 will focus on ensuring that the Official Plan aligns with and supports the objectives of the PPS 2024 and may include:

- Direction on engagement with Indigenous communities;
- Policy direction for compatible employment uses in mixed use areas;
- Further review of Chapter 6 and 7 for consistency with the PPS 2024; and
- Reviewing Chapter 5, Section 37 policies for updates to reflect Community Benefits Charge provisions.

## **RECOMMENDATIONS**

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The Chief Planner and Executive Director, City Planning recommends that:

1. City Council adopt Official Plan Amendment 846 in accordance with Attachment 1.
2. City Council authorize the Chief Planner and Executive Director, City Planning to seek approval of the Minister of Municipal Affairs and Housing of Official Plan Amendment 846 under Section 26 of the Planning Act.
3. City Council authorize the City Solicitor to make such stylistic and technical changes to the recommended Official Plan Amendment 846 as may be required.
4. City Council declare by resolution to the Minister of Municipal Affairs and Housing that Official Plan Amendment 846 conforms with Provincial Plans and does not conflict with them; has regard to the matters of Provincial Interest in Section 2 of the Planning Act; and is consistent with policy statements issued under subsection 3(1) of the Planning Act.
5. City Council authorize the City Solicitor and appropriate staff to take the necessary action to give effect to City Council's decision, including requesting that the Minister of Municipal Affairs and Housing carry forward modifications to Policies 2.2.4.15 and 2.2.4.17 set out in OPA 846 that supersede policies 2.2.4.15 and 2.2.4.17 in OPA 804, should OPA 804 be approved after OPA 846.

## **FINANCIAL IMPACT**

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City Planning confirms that there are no financial implications resulting from the recommendations included in this report in the current budget year or in future years.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact Section.

## **DECISION HISTORY**

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On June 14, 2023, City Council considered a report with City comments to be sent to the Ministry of Municipal Affairs and Housing on provincial policy changes that merge and amend the Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe into one policy document renamed the Provincial Planning Statement. <https://secure.toronto.ca/council/agenda-item.do?item=2023.PH4.8>

On April 17, 2024, City Council adopted a new Chapter 1 of the Official Plan that focuses on advancing reconciliation, creating a Vision to 2051, and setting out principles for a successful and inclusive city. Chapter 1 is intended to inform future amendments to the Official Plan. <https://secure.toronto.ca/council/agenda-item.do?item=2024.PH11.2>

On May 22, 2024, City Council endorsed, with modifications, further recommendations from the City to the Province on the updated PPS 2024. The report's attachment provided detailed analysis of the proposed PPS 2024 policies along with staff recommendations to be sent to the Province.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.PH12.7>

On May 21, 2025, City Council adopted Official Plan Amendment 804 which aligned the City's Official Plan with the new definition of "area of employment" in the Planning Act and PPS 2024, and removed references to the Municipal Comprehensive Review to ensure the City's Employment Area policies are consistent with the PPS 2024. The OPA was sent to the Minister of Municipal Affairs and Housing for approval.

<https://secure.toronto.ca/council/agenda-item.do?item=2025.PH21.1>

## **Background**

On April 6, 2023, as part of Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023, the Ministry of Municipal Affairs and Housing introduced a draft Provincial Planning Statement intended to replace the PPS 2020 and the Growth Plan. Staff reviewed the proposed Provincial Planning Statement and provided Council endorsed comments to the Province recommending changes (see 2023.PH4.8).

On April 10, 2024, the Ministry of Municipal Affairs and Housing introduced Bill 185, Cutting Red Tape to Build More Homes Act, and released a revised Provincial Planning Statement, 2024. Staff reviewed and provided further Council endorsed comments to the Province for consideration (see 2024.PH12.7).

On August 20, 2024, the Province released a revised draft of the PPS 2024, which combined the PPS, 2020 and Growth Plan into a single document. The PPS 2024 came into effect on October 20, 2024.

## **Two-Phased PPS 2024 Consistency Exercise**

Through the Planning Act, the City is required to ensure that the Official Plan is consistent with the PPS 2024. In response, City Planning staff initiated a two-phased PPS 2024 Consistency Exercise to review the new PPS 2024 policies against the City's current Official Plan:

- Phase 1 focuses on addressing policy conflicts between the Official Plan and the PPS 2024.
- Phase 2 will focus on ensuring that the Official Plan aligns with and supports the objectives of the PPS 2024.

## **ENGAGEMENT**

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### **Overview**

The PPS 2024 Consistency Exercise's phase 1 engagement began in Q1 2025 with outreach to Indigenous communities. Staff hosted public and stakeholder engagement meetings in June 2025 with a further public open house scheduled for October 2025. A detailed summary of the Phase 1 engagement program can be found in Attachment 3: OP Consistency Exercise Phase 1 Engagement Report.

### **First Nations Engagement**

The PPS 2024 includes new direction for planning authorities to undertake early engagement with Indigenous communities and coordinate on land use planning matters. The PPS 2024 Consistency Exercise also builds on the recently adopted new Chapter 1 of the Official Plan which includes a key principle of reconciliation through amplifying Indigenous voices in planning processes through respectful, meaningful and early engagement.

Through Phase 1, staff reached out to 10 First Nations and the Toronto Aboriginal Support Services Council (TASSC), with further discussions and engagement with 7 of the First Nations. Staff heard a range of comments from the First Nations, including:

- The need for all levels of government to provide adequate capacity-funding to First Nations governments for engagement;
- Interest in relationship building with the City of Toronto through consultation processes/protocols;
- Interest in establishing a process to have First Nation governments circulated for comment on development applications;
- Ability for First Nations to be involved, according to their own protocols, in archaeological assessments; and
- Importance of acknowledging and respecting First Nations' Treaty Rights.

While feedback from the First Nations goes beyond the scope of Phase 1, staff will continue discussions with the First Nations in Phase 2 to explore how and if comments can be addressed, along with further outreach to urban Indigenous communities. Staff will work with other divisions working on City-wide direction on Indigenous engagement to ensure alignment with ongoing initiatives.

### **Public and Stakeholder Engagement**

Comments received at the Public Meeting and Stakeholder Meeting, both held on June 24, 2025, and through email include:

- Concerns about inadequate investment in public transportation infrastructure;
- Concerns about how green space is protected;
- Concerns about population decline in neighbourhood areas;

- Concerns about the removal of employment lands and whether sufficient land exists to accommodate future employment;
- Questions about how schools are planned for in relation to growth forecasting;
- Concerns about weakened natural heritage system policies in the new PPS 2024; and
- Questions about new PPS 2024 policies for redeveloping shopping plazas and malls.

A full summary of First Nations engagement and public and stakeholder comments can be found in Attachment 3: OP Consistency Exercise Phase 1 Engagement Report.

## **COMMENTS**

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The PPS 2024 includes a wide range of changes to the land use planning framework in Ontario. The balance of this report provides a high-level summary of key changes and how staff propose the Official Plan be amended to address those changes to ensure consistency with the PPS 2024. This report organizes staff analysis and comments under the following themes:

1. Population and Employment Growth Forecasting
2. Transit and Mobility Hubs
3. Urban Growth Centres
4. Former Provincial Plans
5. Heritage and Archaeology
6. Municipal Comprehensive Review
7. Land Use Compatibility

The recommended Official Plan Amendment addressing these themes can be found as Attachment 1: Official Plan Amendment 846. Staff are recommending amendments to the following sections and maps of the Official Plan:

- Table of Contents, Official Plan: List of Maps;
- Chapter 2, Section 2.1 Building a More Liveable Urban Region;
- Chapter 2, Section 2.2.1 Downtown: The Heart of Toronto;
- Chapter 2, Section 2.2.2 Centres: Vital Mixed Communities;
- Chapter 2, Section 2.2.4 Employment Areas: Supporting Business and Employment Growth;
- Chapter 3, Section 3.1.6 Heritage Conservation;
- Chapter 3, Section 3.4 The Natural Environment;
- Chapter 4, Section 4.6 Employment Areas;
- Chapter 6, Secondary Plans 8, 10, 17, 18, 21, 41 and 42;
- Chapter 7, Site and Area Specific Policies 29, 395 and 426; and
- Map 6: Downtown Toronto Urban Growth Centre.

A blacklined version of the proposed changes can be found as Attachment 2: Blacklined Version of Official Plan Amendment 846.

## 1. Population and Employment Growth Forecasting

The PPS 2024 does not carry forward the population and employment growth forecasts that are included in the Growth Plan, which were used as the foundation for the Land Needs Assessment that municipalities were required to undertake to assess the quantity of land required to accommodate the allocated population and employment growth.

PPS 2024 Section 2.1 Planning for People and Homes now directs planning authorities to undertake their own population and employment growth forecasts based on the Ministry of Finance projections at the time of the next City-initiated Official Plan Review. The PPS 2024 states that municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning, provided that it enables planning for projected needs for a time horizon of at least 20 years but not more than 30 years. The forecasts in the Official Plan, and the current Ministry of Finance projections, have a horizon year of 2051. This enables the current forecasts to be used up to 2031, if appropriate.

The Ministry of Finance projections are updated annually and use Statistics Canada's latest annual demographic estimates as a starting point. These estimates and the Ministry's projections vary significantly from one year to the next. For example, their 2025 Projections are sharply different from their 2024 Projections, in which the City's projected growth to 2051 has been halved from about 964,000 to 482,000, and they are sharply lower than their projections to 2046 in recent years. As discussed in the City's [Land Needs Assessment](#) report, growth in Toronto has generally followed a trajectory closer to the Growth Plan Forecasts than the Ministry of Finance Projections. The forecasts currently in the Official Plan are more reflective of the City's growth trajectory and cover the planning horizon required by PPS 2024. In addition, the Ministry of Finance has not issued employment projections.

The Proposed Updates to the Projections Methodology Guideline, prepared by the Ministry of Municipal Affairs and Housing to support implementation of PPS 2024, states that the Ministry of Finance projections do not reflect local characteristics of existing or planned infrastructure capacity or availability, economic and planning assumptions, or information from official plans. The Proposed Updates further states that a major update to the Ministry of Finance Projections is produced every five years after the latest Census, reviewing its methodology and long-term assumptions. The next Census is scheduled by Statistics Canada for 2026, after which a major update to the Ministry of Finance Projections can be anticipated.

As such, OPA 846 includes amendments to the Growth Forecast sidebar in Chapter 2 to reflect the new direction of the PPS 2024 while noting that the Official Plan will continue to forecast growth using the population and employment forecasts previously issued by the Province for the purposes of land use planning. At the time of the next City-initiated Official Plan Review under s. 26 of the Planning Act, the growth projections and forecasts of this Plan will be reviewed and amended as needed to plan for a time horizon of at least 20 years, based on the Ontario Population Projections published by the Ministry of Finance as may be further modified, as appropriate.

## **2. Transit and Mobility Hubs**

The PPS 2024 includes a modified definition of "Higher-order transit" that includes elevated or surface rail and commuter rail. OPA 846 includes an amendment to a sidebar in Chapter 2 to reflect the new definition. This change in definition does not add any new station areas to the City's already-identified network of higher-order transit stations and is not expected to impact other aspects of the City's Official Plan, including the delineation of new Major Transit Station Areas.

Through review of the transit-related sidebars, staff identified a sidebar regarding the Metrolinx Transportation Plan was based on an outdated version of the plan. OPA 846 includes amendments to the sidebar to reflect updated wording around "Mobility Hubs" in the newest version of the Metrolinx Regional Transportation Plan.

## **3. Urban Growth Centres**

Urban Growth Centres were identified through the Growth Plan as focal areas on regional transit infrastructure for investment, employment and population growth. Urban Growth Centres have not been carried forward into the PPS 2024. As such, OPA 846 proposes to delete all references to Urban Growth Centres from the Official Plan and replace, as appropriate, with other existing terms in the Official Plan that maintain the intention of these areas as key locations for growth around transit. This includes modifications to Map 6: Downtown Toronto Urban Growth Centre to delete "Urban Growth Centre" while leaving in "Downtown Toronto". This change does not impact the general policy intent or urban structure contained within the City's Official Plan.

## **4. Former Provincial Plans**

As the former Growth Plan and PPS 2020 have been revoked, OPA 846 proposes to delete all references to those plans and replace them with reference to the new PPS 2024, as appropriate.

## **5. Heritage and Archaeology**

The PPS 2024 includes revised definitions of "areas of archaeological potential", "built heritage resource", "cultural heritage landscape" and "heritage attributes". OPA 846 proposes updates to heritage and archaeology policies and definitions in Chapter 3 to reflect the new definitions in the PPS 2024. Staff do not anticipate that the proposed changes will substantially affect the way the City conserves cultural heritage and archaeological resources.

The PPS 2024 added language encouraging planning authorities to develop and implement "proactive strategies for conserving significant built heritage resources and cultural heritage landscapes." OPA 846 proposes to add wording to reflect direction on developing "proactive strategies" which acknowledges and builds upon some of the practices the City has in place with the Toronto Heritage Survey including Cultural Heritage Resource Assessments as part of planning studies.

The PPS 2024 refers to "Indigenous communities" in a number of policies and non-policy text. Currently, the Chapter 3 heritage and archaeology policies of the Official

Plan refer to Indigenous communities as "First Nations or Metis". OPA 846 proposes to replace "First Nations or Metis" with "Indigenous Peoples" which more closely aligns with the PPS 2024 and the wording used in recently adopted Chapter 1 of the Official Plan. The term "Indigenous Peoples" may refer to First Nations, Metis and Inuit nations, urban Indigenous communities and Indigenous organizations.

## **6. Municipal Comprehensive Review and Employment Area Conversions**

The PPS 2024 does not carry forward the concept of and requirement to undertake a Municipal Comprehensive Review (MCR), which was part of the PPS 2020 and Growth Plan. An MCR requires that municipalities comprehensively apply the policies of the Provincial Policy Statement or Growth Plan when updating an Official Plan or developing a new one. While municipalities will still be required to update their Official Plan every five years (or every ten years after a new official plan) to ensure conformity with provincial land use plans and consistency with PPS 2024, Employment Area conversions were only permitted when municipalities undertook an MCR. Further, the PPS 2024 changes the term "conversions" to "removals". The PPS 2024 now allows for removals of Employment Areas to be considered at any point in time through a development application.

In May 2025 City Council adopted Official Plan Amendment 804 which aligned the City's Official Plan with the new definition of "area of employment" in the *Planning Act* and PPS 2024 and removed references to the MCR in parts of Chapter 2 and 4 of the Official Plan. OPA 846 proposes to further delete reference to the MCR and "conversions" from the remainder of the Official Plan and replace them with "City-initiated Official Plan Review" and "removals", respectively.

## **7. Land Use Compatibility**

The PPS 2024 contains new policy 2.8.1.3 which states: "lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines."

At the time of writing this report, new provincial guidelines regarding long-term economic viability of employment uses have not been issued. However, the new wording helps highlight the importance of protecting employment uses. Until new provincial guidance is issued, this policy shall or should be addressed through the planning rationale submitted as part of a development application for applications within 300 metres of Employment Areas. OPA 846 recommends adding a new policy to reflect the new policy wording of the PPS 2024 under Official Plan Section 2.2.4 Employment Areas: Supporting Business and Employment Growth.

When referring to land use compatibility between major facilities (such as industries) and sensitive land uses (such as residential), the PPS 2024 requires development to "avoid, or if avoidance is not possible, minimize and mitigate adverse effects" from odour, noise, etc. Currently, Official Plan policies relating to land use compatibility refer to "prevention or mitigation of adverse effects" from odour, noise etc. Staff note that the

PPS 2024 language is carried over from the Land Use Compatibility section of the PPS 2020. While staff are of the opinion that the Official Plan's current land use compatibility wording is consistent with the PPS 2024, OPA 846 proposes to align the Official Plan's wording directly with the PPS 2024 to ensure clarity around relevant land use compatibility policies.

## **Alignment with OPA 804**

OPA 804 was adopted by Council on May 29, 2025, its submission to the Ministry of Municipal Affairs and Housing was deemed complete on June 10, 2025, and the Environmental Registry of Ontario (ERO 025-0702) comment period ran from June 24 to August 8, 2025.

Staff note that Official Plan Amendment 804, which aligned the City's Official Plan with the new definition of "area of employment" in the Planning Act and PPS 2024 and removed references to the Municipal Comprehensive Review, has not been adopted by the Ministry of Municipal Affairs and Housing at the time of the writing of this report. OPA 804 includes changes to policies (also renumbered through OPA 804) 2.2.4.15 and 2.2.4.17 to remove reference to the Municipal Comprehensive Review. OPA 846 includes additional revisions to policies 2.2.4.15 and 2.2.4.17 to further clarify those policies. Staff have included a recommendation in this report to flag the issue to the Ministry to ensure that those policies continue to read clearly should OPA 846 be adopted prior to OPA 804.

## **Phase 2 of the PPS 2024 Consistency Exercise**

Phase 2 will focus on ensuring that the Official Plan aligns with and supports the objectives of the PPS 2024. Staff have identified several themes for further consideration in Phase 2, which may include:

- Policy direction to undertake early engagement with Indigenous communities on land use planning matters;
- Policy direction for industrial, manufacturing and small-scale warehousing uses, compatible with sensitive uses, to locate in mixed use areas where frequent transit is available;
- Further review of Chapter 6 and 7 for consistency with the PPS 2024, including PPS 2024 section 2.8 Employment; and
- Reviewing Chapter 5, Section 37 policies for updates to reflect Community Benefits Charge provisions.

Staff will assess the policies, conduct further engagement and report back to Planning and Housing Committee.

## **Conclusion**

The recommended OPA 846 will ensure that the Official Plan does not conflict with the new policy framework set out in the PPS 2024. The recommended OPA 846 is consistent with the PPS 2024, conforms and does not conflict with Provincial Plans, and does not conflict with the rest of the Official Plan. Staff will continue to review the PPS 2024 and bring forward a further report and OPA as part of Phase 2 of this Exercise.

## **CONTACT**

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## **SIGNATURE**

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Jason Thorne, MCIP, RPP  
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City Planning

## **ATTACHMENTS**

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Attachment 1: Official Plan Amendment 846  
Attachment 2: Blacklined Version of Official Plan Amendment 846  
Attachment 3: OP Consistency Exercise Phase 1 Engagement Report