3
REVIEW OF DRAFT SEPTEMBER 2012 PROVINCIAL POLICY STATEMENT

The Planning and Economic Development Committee recommends the adoption of the recommendations contained in the following report dated November 13, 2012, from the Executive Director, Corporate and Strategic Planning and the Commissioner of Transportation and Community Planning.

1. RECOMMENDATIONS

It is recommended that:

1. Council endorse the attached staff comments on the Environmental Bill of Rights posting No. 011-7070, as submitted to the Province on November 22, 2012.

2. The Regional Clerk forward this report to the Minister of Municipal Affairs and Housing.

3. The Regional Clerk circulate this report to local municipalities, the Lake Simcoe Region Conservation Authority and the Toronto and Region Conservation Authority.

2. PURPOSE

This report advises Council of the release of the Province's Draft September 2012 Provincial Policy Statement (PPS). This report also seeks Council endorsement of the comments that were submitted by Regional staff on November 22, 2012 to meet the November 23, 2012 Environmental Bill of Rights Registry (EBR) deadline.

3. BACKGROUND

The PPS provides direction on matters related to land use planning and development within the Province, and must be reviewed at least every five years

The PPS is issued under Section 3 of the *Planning Act*. The current PPS came into effect on March 1, 2005. The PPS provides the foundation for the Province's policy-led planning system and regulation of development and land use. The PPS provides direction on matters of provincial interest and is applied across all of Ontario. All Provincial Plans, including the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan, and the Lake Simcoe Protection Plan have been built upon the PPS. In accordance with the *Planning Act*, all decisions on planning

matters made by the Province, municipalities, and the Ontario Municipal Board must be consistent with the PPS. In turn, the Region's Official Plan and all local municipal official plans must be consistent with the policies of the PPS.

The *Planning Act* requires that the PPS be reviewed at least every five years from the date that a policy statement was issued. The Ministry of Municipal Affairs and Housing (MMAH) began formal consultation on this PPS review in May 2010.

York Region provided comments to the Province in October 2010 and June 2012

In 2010, the MMAH initiated formal consultation on the PPS through a posting to the EBR. York Region, in partnership with its local municipalities, provided consolidated comments to the MMAH on October 28, 2010, followed by Council endorsement of these comments at its meeting on January 27, 2011. These comments reviewed the PPS in its entirety, and are discussed in a later section of this report.

In June 2012, the MMAH invited the Canadian District Energy Association to provide a submission on how district energy policies might be incorporated into the PPS. York Region was part of a stakeholder group established to formulate a response and draft amendments to the PPS on this issue. The resulting comments were sent to the Province on June 4, 2012, followed by Council endorsement of these comments at its meeting on September 20, 2012.

The Province has requested feedback on the draft PPS, its implementation, the need for additional support material and the length of its review cycle

On September 24, 2012, in conjunction with the release of the Draft September 2012 PPS, the MMAH began another session of formal consultation through Posting No. 011-7070 to the EBR, titled "Provincial Policy Statement Five Year Review: Public Consultation on Draft Policies and the Review Cycle for the Provincial Policy Statement." This posting posed the following list of questions:

1. Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?
2. Are there additional land use planning matters that require provincial policy direction and which are not included?
3. Do you foresee any implementation challenges with the draft policies?
4. Is additional support material needed to help implement the PPS?
5. Do you think that the legislated PPS review cycle should be extended from the current 5-year period?

Through this posting, the MMAH has requested comments on the draft policies to ensure that the PPS provides effective policy direction to protect provincial interests and input on the current 5-year review period for the PPS. The formal consultation period for this posting was limited to 60 days, and all comments were required by November 23, 2012.

4. ANALYSIS AND OPTIONS

The Draft September 2012 PPS addresses some of the Region's earlier comments on the ongoing PPS review

As previously indicated, York Region and its local municipalities provided comments to the Province on the PPS review in October 2010 and June 2012. Table 1 summarizes the key themes commented on at those times and indicates how the Province responded.

Table 1
Summary of the integration of York Region's October 2010 and June 2012 PPS Comments

Comment	Included in Draft September 2012 PPS?
• The PPS should be updated to reflect recent Provincial Plans and legislation	• Not addressed
• Introduce sustainability into the PPS	• Sustainability, resiliency and climate change were integrated
• Encourage a provincially linked and protected natural heritage system	• Minor changes
• Provide better connections between land use decisions and human health and well-being	• Recognition of "healthy communities", and separations between major facilities and sensitive land uses
• Allow for longer term planning horizons to plan for and protect employment lands and infrastructure	• Extension of planning horizon for infrastructure, but not for employment lands
• Strengthen the urban agenda to support urban centres and the intensification of corridors	• Not addressed
• Strengthen the focus on a compact urban form to support pedestrians, cycling and transit; and considering transportation at the pedestrian scale earlier in the planning process	• Inclusion of active transportation and transportation demand management
• Support local agriculture and access to local food	• Promotion of local food

Regional staff is pleased to see these improvements and inclusions. However, a number of key Regional comments were not addressed in the Draft September 2012 PPS. Key comments from previous submissions that were not addressed in the Draft September 2012 PPS have been included in Regional and local municipal staff's latest submission to the Province, sent November 22, 2012.

The Draft September 2012 PPS policies build upon the existing policy framework

The Draft September 2012 PPS policies build upon the existing policy framework of the 2005 PPS to provide stronger, clearer direction to support the three goals of:

1. building strong, healthy communities
2. supporting a strong economy
3. protecting the environment and resources

The significant policy updates within the Draft September 2012 PPS include:

- Recognition of Aboriginal interests
- Requiring consideration for potential impacts of climate change
- Encouraging the use of green infrastructure
- Recognition of the benefits of local food and telecommunications infrastructure to economic prosperity
- Extending the planning horizon when planning for infrastructure and public service facilities

Regional staff provided consolidated comments from Regional Departments and Local Municipalities to the Province on November 22, 2012

York Region provided a coordinated response to the MMAH's EBR Posting No. 011-7070 on November 22, 2012 (see *Council Attachment 1*). This submission incorporated comments from Regional Departments, as well as staff comments from all nine local municipalities. These coordinated comments aim to ensure that the revised policies of the PPS are clear, strong, and support municipalities in their implementation of the PPS.

As previously indicated, the Province requested a response to five questions related to the PPS. The following sections summarize the response provided by Regional and local municipal staff on these questions.

Response to question 1: The PPS still needs to be strengthened to effectively protect provincial interests, including employment areas, comprehensive reviews and affordable housing

The Province asked stakeholders whether the draft policies provide sufficient direction to protect provincial interests. Regional and local municipal staff believe that, while the PPS includes policies on a wide variety of land use planning matters, some policies require additional details and clarification to effectively protect provincial interests.

Key comments to the Province include:

- While the PPS recognizes that the planning for and protection of employment areas needs to occur over the long term, the planning horizon is still limited to 20-years unless an alternate time period has been established by another Provincial plan. The Growth Plan still limits the planning horizon to 20-years, and unless this is modified within the Growth Plan, the PPS needs to be revised to allow the planning horizon to extend beyond 20-years for strategic employment areas.
- The definition within the PPS for 'comprehensive reviews' currently includes all official plan amendments adopted by planning authorities. This can be interpreted to enable comprehensive reviews that are initiated by the private sector. This provision should be removed, in compliance with Growth Plan requirements, ensuring that comprehensive reviews are only initiated by regional or local municipalities.
- The PPS recognizes that a range of housing types and densities is required to meet the needs of residents. A range in tenure choices would be helpful in achieving the goals of meeting the needs of residents, especially where affordability is concerned. Provisions for this should be afforded through the PPS or other Provincial tools, as appropriate.

A full list of comments from Regional and local municipal staff can be found in *Council Attachment 1*.

Response to question 2: The PPS speaks to a comprehensive list of land use planning matters that require Provincial direction

The Province asked stakeholders whether additional land use planning matters needed to be included in the PPS. As a whole, Regional and local municipal staff felt that the Draft September 2012 PPS includes policies on a fairly comprehensive list of matters related to land use planning. However, some notable exceptions include:

- The Draft September 2012 PPS is silent on the practice of peat extraction. The Region and local municipalities have had issues with the practice of peat extraction for a number of years. Without appropriate guidance in the PPS to limit or exclude this activity, significant wetland features will continue to be destroyed.
- In light of increased urbanization and the Province's focus on intensification, the PPS should explicitly recognize the importance of natural heritage systems and features in urban environments, including street trees, linked open space systems and creating an urban canopy, as they provide a wide array of benefits to communities.

Additional comments from Regional and local municipal staff can be found in *Council Attachment 1*.

Response to questions 3 & 4: Municipalities require additional support materials to implement the PPS

The Province asked stakeholders whether the policies of the PPS present any implementation challenges, and whether additional support material is needed to help implement the PPS.

Regional and local municipal staff concluded that while the overall direction of the PPS was positive, a number of its policies create implementation challenges for municipalities. These challenges stem from inconsistent interpretations of policies. Some policies within the PPS include unclear and ambiguous language, including new terms that should be explicitly defined within the PPS. Definitions for new terms, such as "climate change" and "resilient", will ensure a clear direction for implementation of related policies. Additionally, some areas of the PPS are not consistent with other Provincial Plans, such as the definition for "comprehensive review" and the Growth Plan. For municipalities subject to the Growth Plan, the PPS must be clear that the Growth Plan policies and its definitions prevail.

Municipalities will also continue to be challenged financially when planning for infrastructure in the long-term. Policies within the PPS call for adequate infrastructure to be in place to meet projected needs, yet many municipalities struggle to secure sustainable funding for these initiatives, without support from the Province. The Province should be clear on the level of financial support that will be provided, to ensure municipalities are able to meet the objectives of the PPS.

Municipalities require additional support materials to implement the PPS, as in many cases these materials are needed to address the implementation challenges referred to above. These support materials should expand on the policy direction within the PPS and provide example of best practices and implementation tools to remove all ambiguity surrounding the intention of policies. For example, some climate change policies refer to "addressing the impacts of climate change". Related support material should identify these potential impacts and include best practices and tools that can be used to address these impacts. It is also important that the Province provide consistent data and methodology that municipalities can use to calculate statistics and municipal targets, such as affordability, and create benchmarks to measure success.

Additional comments from Regional and local municipal staff can be found in *Council Attachment 1*.

Response to question 5: An extended PPS review cycle will support municipalities in implementing and enforcing their land use planning strategies and plans

The Province requested feedback on the current 5-year review cycle of the PPS and whether this should be extended. Regional and local municipal staff noted that most other Provincial plan reviews occur every 10 years.

A number of municipalities have indicated that keeping up with the changing nature of Ontario's planning policy context is taxing staff resources. A number of Provincial plans have been released in recent years, all requiring municipal official plan conformity to the policies within each Provincial plan. This has created a backlog of municipal official plans that are awaiting approval or are under appeal at the Ontario Municipal Board. Short review cycles can mean both additional backlogs, and that reviews of Provincial plans begin when municipalities do not yet have in force policies conforming to the original Provincial plan. Municipalities require additional time to ensure that they are able to enforce policies, so they can fully determine any implementation challenges and provide effective input to a review.

It is recommended that the PPS full review cycle be changed to every 10 years. This is appropriate, provided mid-term reviews and updates can occur whenever new provincial interests are determined.

Link to Key Council-approved Plans

The policies of the PPS shape the contents of all provincial, regional, and local plans related to land use. York Region's Official Plan has the most obvious connection to the PPS and must be consistent with the contents of the PPS. However, since the form of land use has significant implications for Regional interests such as transportation, public health, and wastewater servicing, most key Council-approved plans will be influenced by the PPS. The topics addressed by the policies of the PPS can be directly linked to nearly all of Vision 2051's guiding principles and goal areas, and four of the Strategic Plan's priority areas: Continue to Deliver and Sustain Critical Infrastructure, Improve Social and Health Supports, Increase the Economic Vitality of the Region, and Focus Growth along Regional Centres and Corridors.

The *Planning Act* states that the Region's Official Plan is required to be consistent with the PPS, and that this must be verified during each 5-year review of the Official Plan. Based on the contents of the September 2012 Draft PPS, the Region anticipates that the Region's Official Plan will remain consistent with the PPS. The final release of the PPS will not affect the ongoing appeal process for the York Region Official Plan - 2010.

5. FINANCIAL IMPLICATIONS

There are no direct financial implications associated with Council's endorsement of staff's comments on the Draft September 2012 PPS. Staff time required to review the Draft September 2012 PPS and the Province's next release of the PPS is accommodated within the existing Regional budget.

6. LOCAL MUNICIPAL IMPACT

York Region engaged its local municipalities to discuss the Draft September 2012 PPS and develop a coordinated submission to the Province. The submission made by York Region represents the views of Regional staff and local municipal staff from Aurora, East Gwillimbury, Georgina, King, Markham, Newmarket, Richmond Hill, Vaughan and Whitchurch-Stouffville.

All local municipalities are directly impacted by the PPS due to legislation under the *Planning Act*. All municipal plans, including the Region's Official Plan and all local municipal official plans, are required to be consistent with the PPS. Additionally, all local municipal official plans are required to conform to the Region's Official Plan policies.
Many of the comments submitted to the Province request additional clarity and support materials related to the policies of the PPS. Should the comments of this submission be integrated into the final PPS, local municipalities will be better supported in the implementation of their local official plans.

7. CONCLUSION

On November 22, 2012, York Region staff and staff from all nine local municipalities made a coordinated submission to the Province on the Draft September 2012 PPS. This submission was made through the EBR Posting No. 011-7070, requiring that all comments be received by November 23, 2012.

The Province requested comments on the draft policies to ensure that the PPS provides effective policy direction to protect provincial interests and input on the current 5-year review period for the PPS.

Overall, both Regional and local municipal staff are of the opinion that the Draft September 2012 PPS includes many positive changes from the 2005 PPS. This coordinated response aims to ensure that the revised policies of the PPS are clear, strong and support municipalities in their implementation of the PPS. This submission suggests policy revisions and additions to the PPS, and identifies support materials required to overcome implementation challenges associated with the PPS policies. Additionally, this submission recommends extending the 5-year PPS review cycle to allow municipalities

the time to reach conformity and begin enforcing these policies, prior to the policies undergoing a review.

For more information on this report, please contact Valerie Shuttleworth, Director, Long Range Planning at 905 830-4444, Ext. 1525 or Heather Konefat, Director, Community Planning at Ext. 1502.

The Senior Management Group has reviewed this report.

(The attachment referred to in this clause is attached to this report.)

York Region

November 22, 2012

Darryl Lyons
Team Lead
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street, Floor 14
Toronto, ON, M5G 2E5

Dear Mr. Lyons:

Re: Submission for EBR Registry #011-7070, Provincial Policy Statement Five Year Review: Public Consultation on Draft Policies and the Review Cycle for the Provincial Policy Statement

Thank you for the opportunity to comment on the Draft September 2012 Provincial Policy Statement (PPS), through the EBR Registry Posting #011-7070. This letter constitutes the submission to Posting #011-7070 from York Region staff and staff from the following local municipalities:

- Town of Aurora
- Town of East Gwillimbury
- Town of Georgina
- Township of King
- City of Markham
- Town of Newmarket
- Town of Richmond Hill
- City of Vaughan
- Town of Whitchurch-Stouffville

The comments contained in this letter will be brought to York Region's Planning and Economic Development Committee and Regional Council for endorsement on November 28, 2012 and December 13, 2012, respectively.

Regional and local municipal staff support the PPS' vision of creating strong, healthy and economically viable communities that promote transportation choices, open spaces, affordable housing and employment. Staff were pleased with the inclusion of policies related to climate change, local food, active transportation and transportation demand management within the release of the Draft September 2012 PPS. The PPS was also strengthened by policies that recognized healthy communities, extended the planning horizon for infrastructure, and enhanced coordination of planning activities. Despite these improvements, Regional and local municipal staff believe there are areas that could still be improved.

The comments within this letter aim to ensure that the revised policies of the PPS are clear, strong and support municipalities in their implementation of the PPS.

As requested, Regional and local municipal staff have reviewed the Draft September 2012 PPS and responded to the five review questions posed by the Province. Detailed comments regarding the PPS that have been vetted by the group and received general support have been provided in the attached 'Table 1 – Key Comments', along with specific recommendations for how policies should be modified. Additional comments that did not have enough time to be circulated & reviewed by the entire group have been provided in the attached 'Table 2 – Supplementary Comments'.

1. Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?

While the PPS includes policies on a wide variety of land use planning matters, some policies require additional details and clarification to effectively protect provincial interests. The PPS would be made stronger through the following comments:

- While the PPS recognizes that the planning for and protection of employment areas needs to occur over the long term, the planning horizon is still limited to 20-years unless an alternate time period has been established by another Provincial plan. The Growth Plan still limits the planning horizon to 20 years. Employment areas traditionally build out at a slower pace than other uses, such as residential and major retail, and an extended timeframe is required to allow for effective planning and protection of these areas. Unless the planning horizon within the Growth Plan is modified, the PPS needs to be revised to allow the planning horizon to extend beyond 20 years for strategic employment areas.
- The definition within the PPS for 'comprehensive reviews' currently includes all official plan amendments adopted by planning authorities. This can be interpreted to enable comprehensive reviews that are initiated by the private sector. This provision should be removed to ensure that comprehensive reviews are only initiated by regional or local municipalities.
- The PPS recognizes that a range of housing types and densities is required to meet the needs of residents. A greater choice in housing tenure would be helpful in achieving the goal of meeting the needs of residents, especially where affordability is concerned. Provisions for this should be afforded through the PPS or other Provincial tools, as appropriate.

2. Are there additional land use planning matters that require provincial policy direction and which are not included?

As a whole, the Draft September 2012 PPS includes policies on a fairly comprehensive list of matters related to land use planning. However, some notable exceptions include:

- The Draft September 2012 PPS is silent on the practice of peat extraction. The Region and local municipalities have had issues with the practice of peat extraction for a number of years. Without appropriate guidance in the PPS to limit or exclude this activity, significant wetland features will continue to be destroyed.
- In light of increased urbanization and the Province's focus on intensification, the PPS should explicitly recognize the importance of natural heritage systems and features in urban environments, including street trees, linked open space systems and creating an urban canopy, as they provide a wide array of benefits to communities.

3. Do you foresee any implementation challenges with the draft policies?

The overall direction of the PPS is positive, but a number of its policies create implementation challenges for municipalities. These challenges stem from inconsistent interpretations of policies.

Some policies within the PPS include unclear and ambiguous language, including new terms that should be explicitly defined within the PPS. Definitions for new terms, such as "climate change" and "resilient", will ensure a clear direction for implementation of related policies.

Additionally, some areas of the PPS are not consistent with other Provincial Plans, such as the definition for "comprehensive review" and the Growth Plan. For municipalities subject to the Growth Plan, the PPS must be clear that the Growth Plan policies and its definitions prevail.

Municipalities will also continue to be challenged financially when planning for infrastructure in the long-term. Policies within the PPS call for adequate infrastructure to be in place to meet projected needs, yet many municipalities struggle to secure sustainable funding for these initiatives, without support from the Province. The Province should be clear on the level of financial support that will be provided, to ensure municipalities are able to meet the objectives of the PPS.

4. Is additional support material needed to help implement the PPS?

Municipalities will require additional support materials to implement the PPS. These support materials should:

- Expand on the policy direction or definitions included within the PPS.
- Provide examples of best practices and implementation tools.
- Provide consistent data and methodology to calculate statistics, municipal targets and benchmarks to measure success.

Support materials could go a long way to remove any ambiguity surrounding the intention of PPS policies, and provide a solid foundation for consistent interpretation and application of policies. Examples of where additional support materials are needed to help implement the PPS include:

- Identification of the potential impacts of climate change, and the best practices and tools that can be used to address these impacts.
- Data sources and methodology for calculating affordability within local municipalities.
- Listings of the established standards and regulations referenced within PPS policies.

5. Do you think that the legislated PPS review cycle should be extended from the current 5-year period?

For municipalities, keeping up with the changing nature of Ontario's planning policy context is taxing on staff resources. A number of Provincial plans have been released in recent years, all requiring municipal official plan conformity to the policies within each Provincial plan. This has created a backlog of municipal official plans that are awaiting approval or are under appeal at the

Ontario Municipal Board. Short review cycles can mean both additional backlogs, and that reviews of Provincial plans begin when municipalities do not yet have in force policies conforming to the original Provincial plan. Municipalities would benefit from additional time to ensure that they are able to implement policies and determine any challenges and provide effective input to a review.

Most other Provincial plan reviews are required at least every 10 years. It is recommended that the PPS review cycle also occur with this level of frequency, provided that mid-term reviews and updates can occur whenever new provincial interests are determined. There is also value in ensuring the PPS review is coordinated with the reviews of other Provincial plans. This will further support municipalities in implementing and enforcing their land use planning strategies and plans.

In responding to Questions #3 and #4, above, Regional and local municipal staff identified a number of terms within the Draft September 2012 PPS that were new and/or complex and required definitions and/or additional supportive materials. These new and/or complex terms will have significant implications for how municipalities implement related policies. If the Province moves forward with these proposed terms, we suggest that municipalities be afforded the opportunity to respond to these new definitions before they are finalized in the new PPS. Regional and local municipal staff would be pleased to meet with Provincial staff to review these new and/or complex terms and proposed definitions to ensure that they will serve the needs of municipalities.

Thank you again for this opportunity to comment on the Draft 2012 PPS through the EBR Registry Posting #011-7070. We trust that you will find that these comments strengthen the PPS by ensuring its policies are clear, strong and support municipalities in their implementation of the PPS. We would be pleased to meet with your staff to discuss these recommendations in more detail.

Sincerely,

Valerie Shuttleworth, M.C.I.P., R.P.P.
Director
Long Range Planning

Heather Konefat, M.C.I.P., R.P.P.
Director
Community Planning

vs/hk/tye

Attachment 1 – Table 1: Key Comments on the Draft September 2012 PPS
2 – Table 2: Supplementary Comments on the Draft September 2012 PPS

Copy to: York Region Commissioners
York Region Local Municipalities
Regional Planning Commissioners of Ontario

eDOCS #4485865

Draft Sept. 2012 Provincial Policy Statement Review

TABLE 1
KEY COMMENTS

Table Legend:

"Question #" Column represents what Provincial review question is addressed within any particular comment/table row.

1 = Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?
2 = Are there additional land use planning matters that require provincial policy direction and which are not included?
3 = Do you foresee any implementation challenges with the draft policies?
4 = Is additional support material needed to help implement the Provincial Policy Statement?
5 = Do you think that the legislated Provincial Policy Statement review cycle should be extended from the current 5-year period?

General Comments:

- Use of italics is not consistent. Recommend using italics throughout the document (including in the preambles).
- An additional map that shows the boundaries of where the various other Provincial Plans apply would aid in the interpretation & implementation of provincial policies.
- There are a number of terms within the Draft September 2012 PPS that are new and/or complex. Definitions within the PPS would be helpful in understanding the intent of their related policies, however these definitions must be carefully crafted as they have significant implications for how municipalities will implement these policies. Municipalities recommend that the definitions for these terms be part of a future review/discussion, prior to the release of the final PPS. In addition, many definitions may be too complex to have a single application across the Province. The PPS definition should provide clear direction on the Provincial intent of terms, while allowing for municipalities to further refine the definition for the municipal-level context. Additional supporting materials should also be made available on these topics to further explain these complex concepts.

Draft PPS, Sept 2012 ***Note: Bolded words were added to provide reference to comments**	**Comment/Rationale**	**Details of Suggested Changes**	**Question #**
Part I: PREAMBLE The Provincial Policy Statement provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the Provincial Policy Statement sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for all Ontarians.			
The Provincial Policy Statement provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural environment. The Provincial Policy Statement supports improved land use planning and management, which contributes to a more effective and efficient land use planning system.	- The PPS should include more references to the importance of well-designed buildings and the contextual fit of development.	- Recommend that the paragraph be modified as follows: "The Provincial Policy Statement provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment. The Provincial Policy Statement supports improved land use planning and management, which contributes to a more effective and efficient land use planning system. "	1
The policies of the Provincial Policy Statement may be complemented by provincial plans or by locally-generated policies regarding matters of municipal interest. Provincial plans and municipal official plans provide a framework for comprehensive, integrated, place-based and long-term planning that supports and integrates the principles of strong communities, a clean and healthy environment and economic growth, for the long term. Land use planning is only one of the tools for implementing provincial interests. A wide range of legislation, regulations, policies and programs may also affect planning matters, and assist in implementing these interests.			

Part III: HOW TO READ THE PROVINCIAL POLICY STATEMENT The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning. The Provincial Policy Statement supports a comprehensive, integrated, place-based and long-term approach to planning, and recognizes linkages among policy areas.	- Cultural resources should be formally recognized within the PPS as being important in Ontario's land use planning system.	- Recommend that the paragraph be modified as follows: "The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic, ~~and~~ social and cultural factors in land use planning. The Provincial Policy Statement supports a comprehensive, integrated, place-based and long-term approach to planning, and recognizes linkages among policy areas. "	
Read the Entire Provincial Policy Statement The Provincial Policy Statement is more than a set of individual policies. It is intended to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together. The language of each policy, including the Implementation and Interpretation policies, will assist decision-makers in understanding how the policies are to be implemented. There is no implied priority in the order in which the policies appear. **Consider Specific Policy Language** When applying the Provincial Policy Statement it is important to consider the specific language of the policies. Each policy provides direction on how it is to be implemented, how it is situated within the broader Provincial Policy Statement, and how it relates to other policies. Some policies set out positive directives, such as "settlement areas shall be the focus of growth and development". Other policies set out limitations and prohibitions, such as "development and site alteration shall not be permitted". Other policies use enabling or supportive language, such as "should," "promote" and "encourage".			
The choice of language is intended to distinguish between the types of policies and the nature of implementation. **There is some discretion when applying a policy with enabling or supportive language in contrast to a policy with a directive, limitation or prohibition.**	- Unclear about how the second sentence can be applied. Does one trump the other in importance (limitation, prohibition, etc.). Needs to be reworded to provide more clarity.	Recommended that this paragraph be modified to provide more clarity on what kind of language is considered "enabling or supportive" and a "directive, limitation or prohibition." Additional clarity could be provided on how "should" policies are to be implemented.	1, 3

Geographic Scale of Policies The Provincial Policy Statement recognizes the diversity of Ontario and that local context is important. Policies are outcome oriented, and some policies provide flexibility in their implementation provided that provincial interests are upheld. While the Provincial Policy Statement is intended to be read as a whole, not all polices will be applicable to every site, feature or area. The Provincial Policy Statement applies at a range of geographic scales. Some of the policies refer to specific areas or features and can only be applied where these features or areas exist. Other policies refer to planning objectives that need to be considered in the context of the municipality or planning area as a whole, and are not necessarily applicable to a specific site or development proposal. **Policies Represent Minimum Standards** The policies of the Provincial Policy Statement represent minimum standards. Within the framework of the provincial policy-led planning system, planning authorities and decision-makers may build upon these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policy of the Provincial Policy Statement. **Defined Terms and Meanings** Except for references to legislation which are italicized, other italicized terms in the Provincial Policy Statement are defined in the Definitions section. For other terms, the normal meaning of the word applies. Terms may be italicized only in specific policies; for these terms, the defined meaning applies where they are italicized and the normal meaning applies where they are not italicized. Defined terms in the Definitions section are intended to capture both singular and plural forms of these terms in the policies.			
Part IV: VISION FOR ONTARIO'S LAND USE PLANNING SYSTEM The long-term prosperity and social well-being of Ontarians depend on maintaining strong, sustainable and **resilient** communities, a clean and healthy environment and a strong economy.	- Need clarification on what "resilient" means. Provide a definition and support material. - Cultural resources should be formally recognized within the PPS as being important in Ontario's land use planning system.	- Provide definition for "resilient" (see Definitions below). - Provide municipalities with additional supporting material that illustrates what 'resilient' means. - Recommended that the paragraph be modified as follows: "The long-term prosperity and social well-being of Ontarians depend on maintaining strong, sustainable and resilient communities, a clean and healthy environment, ~~and~~ a strong economy and vibrant culture."	1, 4

Ontario is a vast province with diverse urban, rural and northern communities which may face different challenges related to diversity in population levels, economic activity, pace of growth and physical and natural conditions. Some areas face challenges related to maintaining population and diversifying their economy, while other areas face challenges related to accommodating and managing the development and population growth which is occurring, while protecting important resources and the quality of the natural environment. The Provincial Policy Statement reflects this diversity, which includes the histories and cultures of Aboriginal peoples, and is based on good planning principles that apply in communities across Ontario. The Province recognizes the importance of consulting with Aboriginal communities, as appropriate, on planning matters that may affect their rights and interests. The Provincial Policy Statement focuses growth and development within settlement areas and away from significant or sensitive resources and areas which may pose a risk to public health and safety. It recognizes that the wise management of land use change may involve directing, promoting or sustaining development. Land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns.			
Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are **resilient** to climate change.	- Need clarification on what "resilient" means. Provide a definition and support material. - The PPS should include more references to the importance of well-designed buildings and the contextual fit of development. - Cultural resources should be formally recognized within the PPS as being important in Ontario's land use planning system.	- Provide definition for "resilient" (see Definitions below). - Provide municipalities with additional supporting material that illustrates what 'resilient' means. - Recommend modifying this paragraph as follows: "Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable, ~~and~~ healthy and well-designed communities promote and enhance human health and social well-being, are economically, culturally and environmentally sound, and are resilient to climate change."	1, 4

The Province's natural heritage resources, water resources, including the Great Lakes, agricultural resources and the food provided by these areas, mineral resources, and cultural heritage and archaeological resources provide important environmental, economic and social benefits. The wise use and management of these resources over the long term is a key provincial interest. The Province must ensure that its resources are managed in a sustainable way to maintain biodiversity, protect essential ecological processes and public health and safety, minimize environmental and social impacts, and meet its long-term needs. It is equally important to protect the overall health and safety of the population. The Provincial Policy Statement directs development away from areas of natural and human-made hazards, where these hazards cannot be mitigated. This preventative approach supports provincial and municipal financial well-being over the long term, protects public health and safety, and minimizes cost, risk and social disruption. Taking action to conserve land and resources avoids the need for costly remedial measures to correct problems and supports economic and environmental principles. Strong communities, a clean and healthy environment and a strong economy are inextricably linked. Long-term prosperity, human and environmental health and social well-being should take precedence over short-term considerations. The fundamental principles set out in the Provincial Policy Statement apply throughout Ontario. To support our collective well-being, now and in the future, all land use must be well managed.			
	- The last paragraph of this section in the PPS 2005 provided a larger vision to the Planning System and context within the PPS/this Section. Why was this paragraph deleted? It should be reinstated.	- Recommend re-adding the following paragraph to the end of Part IV: "The Vision for Ontario's Land Use Planning System may be further articulated through planning direction for specific areas of the Province issued through provincial plans, such as those plans created under the *Niagara Escarpment Planning and Development Act* and the *Oak Ridges Moraine Conservation Act, 2001*."	1

Part V: POLICIES **1.0 BUILDING STRONG HEALTHY COMMUNITIES** Ontario is a vast province with urban, rural, and northern communities with diversity in population levels, economic activities, pace of growth and physical and natural conditions. Ontario's long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and **resilient** communities, protecting the environment and public health and safety, and facilitating economic growth. Accordingly:	- Need clarification on what "resilient" means. Provide a definition and support material. - Why not use 'sustainable' in place of 'resilient'? - The Province should review the PPS to ensure consistency in the terms used to describe desired communities, i.e. healthy, accessible, safe, sustainable, liveable, resilient, strong. - It is important to highlight the link between the built environment and health, and additional text in this preamble should get at this connection.	- Provide definition for "resilient" (see Definitions below). - Provide municipalities with additional supporting material that illustrates what 'resilient' means. - Or, recommend replacing the word 'resilient' with 'sustainable', as follows: "Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and ~~resilient~~ sustainable communities, protecting the environment and public health and safety, and facilitating economic growth." - Recommend that the preamble be modified by the addition of a new paragraph at the end of the existing text, as follows: "Health-oriented development creates healthy, sustainable communities by recognizing the value of the quality of our air, soil and water; opportunities for exercise and recreation; access to healthy foods; healthy equity, social cohesion; and, safety and security."	1, 4
1.1 MANAGING AND DIRECTING LAND USE TO ACHIEVE EFFICIENT AND RESILIENT DEVELOPMENT AND LAND USE PATTERNS 1.1.1 Healthy, liveable and safe communities are sustained by: a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; b) accommodating an appropriate range and mix of residential (including affordable housing), employment (including industrial, commercial and institutional uses), recreation, park and open space uses to meet long-term needs; c) avoiding development and land use patterns which may cause environmental or public health and safety concerns; d) avoiding development and land use patterns that would prevent the efficient expansion of *settlement areas* in those areas which are adjacent or close to *settlement areas*; e) promoting cost-effective development patterns and standards to minimize land consumption and servicing costs; f) improving accessibility for persons with disabilities by identifying, preventing and removing land use barriers which restrict their full participation in society; g) ensuring that necessary *infrastructure* and *public service facilities* are or will be available to meet current and projected needs; and h) promoting development and land use patterns that maintain biodiversity and **resilience** to climate change.	- The PPS needs to explicitly acknowledge the fundamental importance of accessibility & include it as an important feature of communities. - Additional details would be helpful to provide context on residential component of clause (b); setting an objective of promoting the ability to age in place. - Human services and schools need to be integrated into communities; having schools within walking distances aids in the active transportation goals of the PPS. - Clause (e) could be strengthened by including transportation and energy as two types of costs that could be minimized by development patterns, as exhibited by other policies within the PPS. - Clause (f) is too limited by only speaking to people with disabilities, and should be expanded to speak to "universal accessibility". - This policy is missing active transportation and cultural heritage as things that sustain communities. These are important and should be	- Recommend that the policy be modified as follows: "Healthy, liveable, accessible and safe communities are sustained by: a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; b) accommodating an appropriate range and mix of residential (which promotes aging in place and includes ~~including~~ affordable housing), employment (including industrial, commercial and institutional uses), recreation, human services (including schools), park and open space uses to meet long-term needs; c) avoiding development and land use patterns which may cause environmental or public health and safety concerns; d) avoiding development and land use patterns that would prevent the efficient expansion of *settlement areas* in those areas which are adjacent or close to *settlement areas*; e) promoting cost-effective development patterns and standards to minimize land consumption, transportation, energy and servicing costs; f) improving universal accessibility for all persons ~~with disabilities~~ by identifying, preventing and removing land use barriers which restrict their full participation in society; g) ensuring that necessary *infrastructure* and *public service facilities* are or will be available to meet current and projected needs; ~~and~~	1, 4

	referenced as new clauses. - The PPS needs to place a stronger emphasis on the relationship between land use planning, transportation planning and public health. - The impact of development patterns on public health should be highlighted. - Healthy, liveable and safe communities are places where people want to be; and an important facet to desirable communities is the sense of place and connections provided through artistic and cultural diversity and expressions. This should be tied to the community framework. - Need clarification on what "resilience" means. Provide a definition and support material.	h) promoting development and land use patterns that maintain biodiversity and resilience to climate change~~.~~; i) integrated, accessible and convenient opportunities for active transportation; j) a strong cultural heritage that is protected and restored; k) considering land use, transportation and public health issues through all stages of the planning process; and, l) promoting development and land use patterns that improve public health outcomes, including improved air quality and increased physical activity. m) promoting and enhancing opportunities for artistic and cultural expressions." - Provide definition for "resilience" (see Definitions below). - Provide municipalities with additional supporting material that illustrates what 'resilience' means.	

1.1.2	Sufficient land shall be made available through *intensification* and *redevelopment* and, if necessary, *designated growth areas*, to accommodate an appropriate range and mix of employment opportunities, housing and other land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a *provincial plan*, that time frame may be used for municipalities within the area. Nothing in policy 1.1.2 limits the planning for *infrastructure* and *public service facilities* beyond a 20-year time horizon.	- The protection of employment areas for the long term is necessary for municipal and Provincial economic prosperity. This policy recognizes the longer terms needed for infrastructure and public facilities, and only allows for employment areas to be planned beyond a 20-year horizon if another provincial plan includes an alternate timeline. Currently, the Growth Plan also includes a limit of 20-years. If the Growth Plan is not going to be updated to acknowledge the need for employment areas to be planned for the longer term, then the PPS should be revised to do so. - In order to assist in the long term planning for infrastructure, we encourage the Province to also amend the Development Charges Act to: identify the long-term financial sustainability needed to support designated growth areas; review opportunities to include a forward looking level of service; and address how to fully accommodate the capital costs that are needed to support such development within the market constraints to absorb all or a portion of the required development charges.	- Recommend that the Growth Plan be modified to extend the planning horizon for employment areas beyond 20 years. - And/or, recommend that this policy be modified as follows: "Sufficient land shall be made available through *intensification* and *redevelopment* and, if necessary, *designated growth areas*, to accommodate an appropriate range and mix of employment opportunities, housing and other land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a *provincial plan*, that time frame may be used for municipalities within the area. Nothing in policy 1.1.2 limits the planning for *infrastructure*, employment areas and *public service facilities* beyond a 20-year time horizon".	1, 3
1.1.3 Settlement Areas				
The vitality of settlement areas is critical to the long-term economic prosperity of our communities. Development pressures and land use change will vary across Ontario. It is in the interest of all communities to use land and resources wisely, to **promote** efficient development patterns, protect resources, promote green spaces, ensure effective use of infrastructure and public service facilities and minimize unnecessary public expenditures.	- 'Promote' is not strong enough language surrounding efficient development patterns. The PPS previously spoke to 'ensuring' this, and should be maintained. - "The protection of public health and safety" is a provincial interest under Section 2(o) of the Planning Act. The goals of protecting health should be reinforced throughout the PPS.	- Recommend that the policy be modified as follows: "It is in the interest of all communities to use land and resources wisely, to ~~promote~~ ensure efficient development patterns, protect resources, protect public health and safety, promote green spaces, ensure effective use of infrastructure and public service facilities and minimize unnecessary public expenditures."	1

1.1.3.1	*Settlement areas* shall be the focus of growth or development, and their vitality and regeneration shall be promoted.	- This policy should refer to growth **and** development.	- Recommend that the typo in this policy be fixed by modifying the policy, as follows: "*Settlement areas* shall be the focus of growth and ~~or~~ development, and their vitality and regeneration shall be promoted."	1
1.1.3.2	Land use patterns within *settlement areas* shall be based on: a) densities and a mix of land uses which: 1. efficiently use land and resources; 2. are appropriate for, and efficiently use, the *infrastructure* and *public service facilities* which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; 3. minimize negative impacts to air quality and climate change, and promote energy efficiency and; 4. support *active transportation*; 5. are *transit-supportive*, where transit is planned, exists or may be developed; and 6. support the efficient movement of goods; and b) a range of uses and opportunities for *intensification* and *redevelopment* in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.	- Clarification in the language of this policy is recommended. - This policy neglects to include the protection of water quality and should be added. - The Province should provide a standard process to identify the negative impacts referred to in clause (a.3) such as through health, environmental and cumulative impact studies. - An important desirable outcome of good land use patterns is not simply a community that promotes active transportation or is transit supportive, but a development pattern that reduces the number and length of trips. This notion is fundamental, yet only appears in the PPS in policies 1.6.6.4 and 1.8.1.e. Only when trips are short enough, will promoting active transportation and transit work effectively.	- Recommend that this policy be modified as follows: Land use patterns within *settlement areas* shall be based on: a) densities, and a mix and range of land uses which: 1. efficiently use land and resources; 2. are appropriate for, and efficiently use, the *infrastructure* and *public service facilities* which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; 3. minimize negative impacts to air and water quality and climate change, and promote energy efficiency ~~and~~; 4. support *active transportation* and reduce the number and length of trips of residents; 5. are *transit-supportive*, where transit is planned, exists or may be developed; and 6. support the efficient movement of goods; and b) a range of uses and opportunities for *intensification* and *redevelopment* in accordance with the criteria in policy 1.1.3.3, where this can be accommodated. - Provide additional support material regarding identifying negative impacts to air and water quality and climate change, such as through health, environmental and cumulative impact studies.	1, 4
1.1.3.7	Planning authorities shall establish and implement phasing policies to ensure: a) that specified targets for *intensification* and *redevelopment* are achieved prior to, or concurrent with, new development within *designated growth areas*; and b) the orderly progression of development within *designated growth areas* and the timely provision of the *infrastructure* and *public service facilities* required to meet current and projected needs.	- The wording of this policy should be harmonized with the Growth Plan to remove misinterpretation. Consistency in the language of policies is important to effective implementation and interpretation. - If the wording of the Growth Plan is not appropriate for communities outside of the Greater Golden Horseshoe, then it should be explicitly stated within the PPS that the policies of the Growth Plan take precedence over those in the PPS in the GGH area.	- Recommend that the wording of this policy be modified to be the same as in the Growth Plan. - And/or, that the PPS include a policy/clause that explicitly states what Provincial policies take precedence: "In those municipalities subject to localized Provincial Plans, such as the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan, the Greenbelt Plan, and the Lake Simcoe Protection Plan, the policies and definitions of the localized Provincial Plans prevail to the extent of any conflict or difference from the PPS."	1, 3

1.1.3.8	A planning authority may identify a *settlement area* or allow the expansion of a *settlement area* boundary only at the time of a *comprehensive review* and only where it has been demonstrated that: a) sufficient opportunities for growth are not available through *intensification*, *redevelopment* and *designated growth areas* to accommodate the projected needs over the identified planning horizon; b) the *infrastructure* and *public service facilities* which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment; c) in *prime agricultural areas*: 1. the lands do not comprise *specialty crop areas*; 2. alternative locations have been evaluated, and i. there are no reasonable alternatives which avoid *prime agricultural areas*; and ii. there are no reasonable alternatives on lower priority agricultural lands in *prime agricultural areas*; d) the new or expanding *settlement area* is in compliance with the *minimum distance separation formulae*; and e) impacts from new or expanding *settlement areas* on agricultural operations which are adjacent or close to the *settlement area* are mitigated to the extent feasible. In determining the most appropriate direction for expansions to the boundaries of *settlement areas* or the identification of a *settlement area* by a planning authority, a planning authority shall apply the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.	- The wording of this policy and definition for *comprehensive review* should be harmonized with the Growth Plan to remove misinterpretation. Consistency in the language of policies is important to effective implementation and interpretation. - If the wording of the Growth Plan is not appropriate for communities outside of the Greater Golden Horseshoe, then it should be explicitly stated within the PPS that the policies of the Growth Plan take precedence over those in the PPS in the GGH area. - York Region is already witnessing the effects of inconsistently worded policies between the Growth Plan and PPS, through the appeals to the Region's Official Plan.	- Recommend that the definition for *comprehensive review* be modified to be the same as in the Growth Plan (see Definitions below). - Recommend that the wording of this policy be modified to be the same as in the Growth Plan - And/or, that the PPS include a policy/clause that explicitly states what Provincial policies take precedence: "In those municipalities subject to localized Provincial Plans, such as the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan, the Greenbelt Plan, and the Lake Simcoe Protection Plan, the policies and definitions of the localized Provincial Plans prevail to the extent of any conflict or difference from the PPS."	1, 3
1.1.4	**Rural Areas in Municipalities**			
1.1.4.5	*Agricultural uses*, *agriculture-related uses*, ***on-farm diversified*** *uses* and *normal farm practices* should be protected and promoted in accordance with **provincial standards**.	- Pleased with the inclusion of the *on-farm diversified uses*. - However, the restriction of 'small scale' in the on-farm diversified uses definition may be problematic by limiting opportunities for food production activities. - If *on-farm diversified uses* is included in the PPS, then it should also be reflected in the Greenbelt Plan when it is amended in 2015. However, until it is amended, this definition is effectively not applicable in Greenbelt Plan communities. This is a problem. - Need more clarification on what "provincial standards" are being referred to in this policy.	- See Definitions comments under *on-farm diversified uses* below. - Modify this policy to clarify what provincial standards are being referred to and where they can be found.	1, 4

1.1.4.7	Opportunities should be retained to locate new or expanding land uses that require separation from other uses.	- Additional materials/guidelines are required to clearly outline what is expected for separation distances from land uses. Wording from policy 2.3.3.1 could be added to allude to these guidelines.	- Recommended that the policy be modified as follows: "Opportunities should be retained to locate new or expanding land uses that require separation from other uses. Criteria for these uses may be based on guidelines developed by the Province or municipal approaches, as set out in municipal planning documents, which achieve the same objectives."	1
1.2	**COORDINATION**	- Needs and characteristics of communities across the Province vary; even when located in proximity to each other. Context sensitive planning solutions need to be explicitly emphasized. - Pleased with the addition of "multi-modal transportation systems" to clause (d). - It is important to identify that coordination is also needed across Provincial Ministries. A definition of what are considered as "agencies and boards". - Cross-boundary and agency coordination is also required when addressing climate change, and air and water quality. - Due to the cross-boundary nature of sourcewater protection areas, and all of the groups, agencies, and municipalities needed to implement sourcewater protection plans, effective coordination of these plans need to be explicitly addressed in this policy.	- Recommend that the policy be modified as follows: "A coordinated, integrated and comprehensive approach that provides a context sensitive solution should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other levels of government, across Provincial Ministries, agencies and boards (including public health units, school boards and conservation authorities) including: a) managing and/or promoting growth and development; b) economic development strategies; c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources; d) *infrastructure*, *multi-modal transportation systems*, *public service facilities* and *waste management systems*; e) ecosystem, shoreline, watershed, and Great Lakes related issues; f) natural and human-made hazards; g) population, housing and employment projections, based on *regional market areas*; and h) addressing housing needs in accordance with provincial policy statements such as the Ontario Housing Policy Statement. i) identifying climate change mitigation, impacts and adaptation measures. j) addressing impacts to air and water quality. k) implementing sourcewater protection plans."	1,3
1.2.1	A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other levels of government, agencies and boards including: a) managing and/or promoting growth and development; b) economic development strategies; c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources; d) *infrastructure*, *multi-modal transportation systems*, *public service facilities* and *waste management systems*; e) ecosystem, shoreline, watershed, and Great Lakes related issues; f) natural and human-made hazards; g) population, housing and employment projections, based on *regional market areas*; and h) addressing housing needs in accordance with provincial policy statements such as the Ontario Housing Policy Statement.			
1.2.2	Planning authorities are **encouraged** to coordinate planning matters with Aboriginal communities, **where appropriate**.	- The need to coordinate planning initiatives with Aboriginal communities needs to be stronger in this policy. - The wording surrounding "encouraging" needs to be strengthened.	- Recommend that the policy be modified as follows: "Planning authorities are ~~encouraged~~ required to coordinate planning matters with Aboriginal communities, where appropriate."	1

1.2.3	Planning authorities should coordinate emergency management and other economic, environmental and social planning considerations to support efficient and **resilient** communities.	- Emergency management should also include human health considerations. - Need clarification on what "resilient" means. Provide a definition and support material. - This policy is broad and additional detail is needed on the scope and intent of this policy.	- Recommend that the policy be modified as follows: "Planning authorities should coordinate emergency management and other economic, environmental, human health and social planning considerations to support efficient and resilient communities." - Provide definition for "resilient" (see Definitions below). - Provide municipalities with additional supporting material that illustrates what 'resilient' means. - Recommend modifying this policy to provide additional detail on the scope and intent of the policy.	1, 4

1.2.4	Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall: a) identify, coordinate and allocate population, housing and employment projections for lower-tier municipalities. Allocations and projections by upper-tier municipalities shall be based on and reflect *provincial plans* where these exist; b) identify areas where growth or development will be directed, including the identification of nodes and the corridors linking these nodes; c) identify targets for *intensification* and *redevelopment* within all or any of the lower-tier municipalities, including minimum targets that should be met before expansion of the boundaries of *settlement areas* is permitted in accordance with policy 1.1.3.8; d) where transit corridors exist or are to be developed, identify density targets for areas adjacent or in proximity to these corridors, including minimum targets that should be met before expansion of the boundaries of *settlement areas* is permitted in accordance with policy 1.1.3.8; and e) identify and provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries.	- Clause (d) should be expanded into a new Clause (e) that also ensures that coordination is used to implement strategies and requirements to ensure the success of transit and active transportation corridors. - The Province should provide supplementary information regarding the types of strategies and development requirements that can be used to ensure the success of transit and active transportation corridors.	- Recommend modifying this policy as follows: "Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall: a) identify, coordinate and allocate population, housing and employment projections for lower-tier municipalities. Allocations and projections by upper-tier municipalities shall be based on and reflect *provincial plans* where these exist; b) identify areas where growth or development will be directed, including the identification of nodes and the corridors linking these nodes; c) identify targets for *intensification* and *redevelopment* within all or any of the lower-tier municipalities, including minimum targets that should be met before expansion of the boundaries of *settlement areas* is permitted in accordance with policy 1.1.3.8; d) where transit corridors exist or are to be developed, identify density targets for areas adjacent or in proximity to these corridors, including minimum targets that should be met before expansion of the boundaries of *settlement areas* is permitted in accordance with policy 1.1.3.8; ~~and~~ e) where transit or active transportation corridors exist or are to be developed, implement strategies and development requirements to ensure the success of these corridors; and f) identify and provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries. " - Recommend that the Province provide supplementary information regarding strategies and development requirements that can help ensure the success of transit and active transportation corridors. Examples can include reduced parking requirements, transit-oriented development and Transportation Demand Management strategies.	1, 4

1.2.6	**Land Use Compatibility** 1.2.6.1 *Major facilities* and *sensitive land uses* should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent *adverse effects* from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of *major facilities*.	- This policy should not be limited to odour, noise and other contaminants; it should also consider air pollution and poor air quality. - This policy needs to be made stronger; not be limited to only the compatibility of *major facilities* and *sensitive land uses*. - This policy should speak to the important principles of land use compatibility. - The Land Use Compatibility section & one policy seem like an orphan, and supporting policies should be added to the PPS. - The Land Use Compatibility section of the PPS should provide more detailed information regarding separation distances between incompatible land uses.	- Recommend that the policy be modified as follows: "*Major facilities* and *sensitive land uses* should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent *adverse effects* from air pollution, odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of *major facilities*." - Recommend that additional policies be added to the PPS that speak to the land use compatibility of land uses in addition to major facilities and sensitive land uses. - Recommend that additional supportive policies be added to the PPS. - Additional support materials should be developed that provide recommended separation distances between sensitive land uses and major facilities and high traffic corridors. This material should be based on best practice and current scientific studies. Background air quality and cumulative impacts should also be taken into consideration. Similar to the "minimum distance separation formulae" for livestock facilities, minimum separation formula should be developed for the application of this policy and ensure that jurisdictions have the opportunity to adopt more restrictive separation distances.	1, 4
1.3	**EMPLOYMENT** 1.3.1 Planning authorities shall promote economic development and competitiveness by: a) providing for an appropriate mix and range of employment (including industrial, commercial and institutional) uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; c) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities; and d) ensuring the necessary *infrastructure* is provided to support current and projected needs.	- Pleased by the separation Employment Areas policies from Employment policies, although there are issues regarding the definition *employment areas* as it is too broad. - Clause (c) needs to be clarified, to ensure that it only applies to appropriate locations away from protected employment areas, to ensure that this policy cannot be interpreted to allow for the conversion of employment lands to mixed use development.	- See *employment areas* definition (below). - Recommend that the policy be modified as follows: "Planning authorities shall promote economic development and competitiveness by: a) providing for an appropriate mix and range of employment (including industrial, commercial and institutional) uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; c) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, outside of employment areas. d) ensuring the necessary *infrastructure* is provided to support current and projected needs."	1

1.3.2	**Employment Areas**	- The definition for *employment areas* is problematic for both the Region and the local municipalities. - The terms "projected need" and "long term" seem to be used interchangeably in relation to *employment areas*, yet the true timeline of these has not been defined. This is subject to misinterpretations and difficult to implement. A clear definition of these time periods is required. - Municipalities need to be able to plan for *employment areas* beyond the 20-year horizon.	- See *employment areas* definition (below) - Clarify the time horizon implied by "projected needs" and "long term", ensuring they are consistent & permit the planning for *employment areas* beyond 20-years. - Provide other tools for planning, protecting and preserving *employment areas* beyond 20-years.	1, 3, 4
1.3.2.1	Planning authorities shall plan for, protect and preserve ***employment areas*** for current and future uses and ensure that the necessary *infrastructure* is provided to support current and **projected needs**.			
1.3.2.2	Planning authorities may permit **conversion** of lands within *employment areas* to **non-employment uses** through a ***comprehensive review***, only where it has been demonstrated that the land is not required for employment purposes over the **long term** and that there is a need for the conversion.	- The definition of *comprehensive review* is problematic for the Region and local municipalities as it allows for reviews that are initiated by the private sector. - The idea that municipalities may permit the conversion if the lands are not required for employment over the "long term" runs counter to the expressed need for municipalities to "plan, protect and preserve" employment lands in the previous policy 1.3.2.1. - The terms "projected need" and "long term" seem to be used interchangeably in relation to *employment areas*, yet the true timeline of these has not been defined. This is subject to misinterpretations and difficult to implement. A clear definition of these time periods is required. - Municipalities need to be able to plan for *employment areas* beyond the 20-year horizon. - The conversion policies of the PPS do not match those within the Growth Plan. It should be explicit that the Growth Plan policies take precedence in these communities. - A definition of 'conversion' and 'non-employment use' would provide additional clarification to this policy.	- See *comprehensive review* definition (below). - Clarify the time horizon implied by "projected needs" and "long term", ensuring they are consistent & permit the planning for *employment areas* beyond 20-years. - Provide other tools for planning, protecting and preserving *employment areas* beyond 20-years. - Recommend addition of a policy that explicitly states what Provincial policies take precedence: "In those municipalities subject to localized Provincial Plans, such as the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan, the Greenbelt Plan, and the Lake Simcoe Protection Plan, the policies and definitions of the localized Provincial Plans prevail to the extent of any conflict or difference from the PPS." - Recommend the addition of definitions for 'conversion' and 'non-employment use' (see definitions below).	1, 3, 4

1.3.2.3	Planning authorities shall protect *employment areas* in proximity to *major goods movement facilities and corridors* for employment uses that require those locations.	- The idea behind this policy is good, but needs additional clarifications. - What are the tools that can be used for this protection and what is the planning time frame being considered in this policy? It should be beyond 20-years.	- Provide other tools for planning, protecting and preserving *employment areas* and define the planning horizon beyond 20-years.	1, 4
1.3.2.4	Planning authorities may plan for the **long-term** protection of employment areas provided lands are not designated beyond the planning horizon identified in policy 1.1.2.	- As the Draft PPS is currently written, this policy does not provide additional guidance beyond policy 1.1.2. If policy 1.1.2 is not altered though revisions suggested above, this policy should be reworded, or deleted. - The instance of 'employment area' in this policy should be italicized. - This policy does not explain how *employment areas* can be planned for the long-term, if they are not designated beyond the 20-year horizon. - Municipalities need to be able to plan for *employment areas* beyond the 20-year horizon. - The terms "projected need" and "long term" seem to be used interchangeably in relation to *employment areas*, yet the true timeline of these has not been defined. This is subject to misinterpretations and difficult to implement. A clear definition of these time periods is required. - Employment lands traditionally build out at a slower pace than other uses such as residential and major retail, the timeframe should be extended to 30 years to accommodate effective planning and protection of these areas.	- Recommend that should the changes recommended for policy 1.1.2 not be made, that this policy be deleted, or… - Clarify the time horizon implied by "projected needs" and "long term", ensuring they are consistent & permit the planning for *employment areas* beyond 20-years. - Or, clarify within this policy how municipalities can plan for the long-term without designating lands beyond 20-years. - Provide other tools for planning, protecting and preserving *employment areas* beyond 20-years. - Recommend that the policy be modified by italicizing the instance of "employment areas"	1, 3, 4

1.4	**HOUSING**			
1.4.1	To provide for an appropriate range of housing types and densities required to meet projected requirements of current and future residents of the *regional market area* identified in policy 1.4.3, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through *residential intensification* and *redevelopment* and, if necessary, lands which are *designated and available* for residential development; and b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate *residential intensification* and *redevelopment*, and land in draft approved and registered plans.	- The language in this policy should be revised to include a "mix and range" of housing. - To address issues of affordability and meet the needs of residents, a greater choice in housing tenure would be helpful. The Province needs to address the provision of a greater choice in tenure through the PPS or other Provincial tools, as appropriate.	- Recommend that this policy be modified as follows: "To provide for an appropriate mix and range of housing types and densities required to meet projected requirements of current and future residents of the *regional market area* identified in policy 1.4.3, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through *residential intensification* and *redevelopment* and, if necessary, lands which are *designated and available* for residential development; and b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate *residential intensification* and *redevelopment*, and land in draft approved and registered plans. - Recommend that additional support materials be provided that include tools for municipalities to ensure a diversified and appropriate housing stock, including a greater choice in housing tenure.	1, 4
1.4.3	Planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the *regional market area* by: a) establishing and implementing minimum targets for the provision of housing which is ***affordable*** to *low and moderate income households*. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities; b) permitting and facilitating: 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and 2. all forms of *residential intensification* and *redevelopment* in accordance with policy 1.1.3.3; c) directing the development of new housing towards locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation* and transit in areas where it exists or is to be developed; and e) establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate	- Municipalities will have implementation issues surrounding the definition of *affordable*. - The language in this policy should be revised to include a "mix and range" of housing. - To address issues of affordability and meet the needs of residents, a greater choice in housing tenure would be helpful. The Province needs to address the provision of a greater choice in tenure through the PPS or other Provincial tools, as appropriate. - Additional tools are required to help control tenure, to ensure an appropriate housing stock. - Densities for new housing should support Transportation Demand Management plans. - Secondary suites are a form of housing that will help address issues of affordability and help municipalities reach intensification targets. The PPS should recognize	- See *affordable* definition (below). - Recommend that the Province address the provision for a greater choice in housing tenure. This should be done through Provincial tools and legislation, and should the Province find it appropriate to address tenure within the PPS, that an additional clause could be added to this policy, as follows: " b) 3. a greater choice in tenure options for all forms of housing." - Recommend that the policy be modified as follows: "Planning authorities shall provide for an appropriate mix and range of housing types, and densities to meet projected requirements of current and future residents of the *regional market area* by:" a) establishing and implementing minimum targets for the provision of housing which is *affordable* to *low and moderate income households*. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities; b) permitting and facilitating: 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and	1, 2, 3, 4

compact form, while maintaining appropriate levels of public health and safety.	the recent Planning Act changes and include a policy on secondary suites, within the Housing Section.	2. all forms of *residential intensification* and *redevelopment* in accordance with policy 1.1.3.3; c) directing the development of new housing towards locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the development of Transportation Demand Management plans and the use of *active transportation* and transit in areas where it exists or is to be developed; and, e) establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety. f) establishing provisions to allow secondary units in detached, semi-detached and row houses, as well as ancillary structures.“ - Recommend that additional support materials be provided that include tools for municipalities to ensure a diversified and appropriate housing stock, including a greater choice in housing tenure.	

1.5 **PUBLIC SPACES, RECREATION, PARKS, TRAILS AND OPEN SPACE** 1.5.1 Healthy, active communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate *active transportation* and community connectivity; b) planning and providing for a full range and equitable distribution of publicly-accessible built and natural settings for *recreation*, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources; c) providing opportunities for public access to shorelines; and d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.	- Street trees provide multiple benefits to communities, including creating spaces that people want to be active within & should be included in clause (a). - The PPS needs to explicitly acknowledge the fundamental importance of accessibility & include it as an important feature of community elements. Clause (a) should be modified to include people of all ages and abilities. - "The protection of public health and safety" is a provincial interest under Section 2(o) of the Planning Act. The importance of public health needs to be reinforced in this policy, especially as it relates to healthy, active communities. - Additional details are required to clarify what is included under "other protected areas" and specifically name these areas. - Clause (d) can be further clarified by drawing the link between human health and ecological health.	- Recommend that the policy be modified as follows: Healthy, active communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians of all ages and abilities, provide space for trees, protect and promote public health and safety, foster social interaction and facilitate *active transportation* and community connectivity; b) planning and providing for a full range and equitable distribution of publicly-accessible built and natural settings for *recreation*, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources; c) providing opportunities for public access to shorelines; and d) recognizing the importance of provincial parks, conservation reserves, and other protected areas for both community and ecological health, and minimizing negative impacts on these areas"	1
1.6 **INFRASTRUCTURE AND PUBLIC SERVICE FACILITIES** 1.6.1 *Infrastructure* and *public service facilities* shall be provided in a coordinated, efficient and cost-effective manner that considers impacts from **climate change** while accommodating projected needs. Planning for *infrastructure* and *public service facilities* shall be coordinated and integrated with land use planning so that they are financially viable over their life cycle and available to meet current and projected needs.	- The PPS should reinforce that governments need to utilize financially sustainable models, especially when looking at long-term planning and maintenance of infrastructure and public service facilities. - Municipalities will have difficulty implementing solutions to the 'impacts of climate change', when they have not been defined. Need clarity on what the issues are, either through a definition and/or through additional support material. - It is important to speak to the use of renewable energy. This section of the PPS is silent on renewable energy, when it should be included.	- Recommend that the policy be modified as follows: "*Infrastructure* and *public service facilities* shall be provided in a financially sustainable, coordinated, efficient and cost-effective manner that considers impacts from climate change while accommodating projected needs. Planning for *infrastructure* and *public service facilities* shall be coordinated and integrated with land use planning so that they are financially viable over their life cycle and available to meet current and projected needs." - Recommend the addition of a definition for 'climate change', including the 'impacts of climate change'. (See definition section below). - And/or, provide additional support material about what the impacts of climate change are. - Recommend modifying the definition for *infrastructure* to include renewable energy systems (see definition section below).	1, 3, 4

1.6.2	Before consideration is given to developing new *infrastructure* and *public service facilities*: a) the use of existing *infrastructure* and *public service facilities* should be optimized; b) opportunities for adaptive re-use should be considered, wherever feasible; and c) the use of *green infrastructure* should be encouraged, where feasible, to augment *infrastructure*, and for other associated ecological and hydrological benefits.	- It is important to speak to the use of renewable energy. This section of the PPS is silent on renewable energy. It should be included in this policy. - Public health should be included in the list of benefits associated with green infrastructure.	- Recommend modifying the definition for *infrastructure* to include renewable energy systems (see definition section below). - Recommend that the policy be modified as follows: "Before consideration is given to developing new *infrastructure* and *public service facilities*: a) the use of existing *infrastructure* and *public service facilities* should be optimized; b) opportunities for adaptive re-use should be considered, wherever feasible; and c) the use of *green infrastructure* should be encouraged, where feasible, to augment *infrastructure*, and for other associated human health, ecological and hydrological benefits."	1
1.6.5	**Sewage, Water and Stormwater** 1.6.5.1 Planning for *sewage and water services* shall: a) direct and accommodate expected growth or development in a manner that promotes the efficient use and optimization of existing: 1. *municipal sewage services* and *municipal water services*; and 2. *private communal sewage services* and *private communal water services*, where *municipal sewage services* and *municipal water services* are not available; b) ensure that these systems are provided in a manner that: 1. can be sustained by the water resources upon which such services rely; 2. is feasible, financially viable and complies with all regulatory requirements; and 3. protects human health and the natural environment; c) promote water conservation and water use efficiency; d) integrate servicing and land use considerations at all stages of the planning process; and e) be in accordance with the servicing hierarchy outlined through policies 1.6.5.2, 1.6.5.3, 1.6.5.4 and 1.6.5.5.	- A cost-benefit analysis is needed to determine the optimum density related to infrastructure investment.	- Municipalities need additional support materials that aid in the cost-benefit analysis needed to determine the optimum density related to infrastructure investment.	4
1.6.5.3	Where *municipal sewage services* and *municipal water services* are not provided, *private communal sewage services* and *private communal water services* may be used.	- The current wording of this policy appears to allow the carte blanche use of private communal services, which is not appropriate. Additional clarification on the limitations is needed to reflect the municipal involvement, and financial and administrative realities of permitting such servicing solutions.	- Recommend that the policy be modified as follows: "Where *municipal sewage services* and *municipal water services* are not provided, *private communal sewage services* and *private communal water services* may be ~~used~~ considered, subject to municipal approvals and suitable administrative and financial arrangements, to the satisfaction of the municipality or Province in areas without municipal organization."	1, 3

1.6.5.4	Where *municipal sewage services* and *municipal water services* or *private communal sewage services* and *private communal water services* are not provided, *individual on-site sewage services* and *individual on-site water services* may be used provided that site conditions are suitable for the long-term provision of such services with **no *negative impacts***. In *settlement areas*, these services may only be used for infilling and minor rounding out of existing development.	- The reference to 'no negative impacts' is not appropriate in this policy, as there will always be some negative impacts to septic systems. It would be more appropriate to reference the Ontario Building Code.	- Recommend that the policy be modified as follows: "Where *municipal sewage services* and *municipal water services* or *private communal sewage services* and *private communal water services* are not provided, *individual on-site sewage services* and *individual on-site water services* may be used provided that site conditions are suitable for the long-term provision in accordance with the Ontario Building Code ~~of such services with no *negative impacts*~~. In *settlement areas*, these services may only be used for infilling and minor rounding out of existing development."	1
1.6.5.5	*Partial services* shall only be permitted in the following circumstances: a) where they are necessary to address failed *individual on-site sewage services* and *individual on-site water services* in existing development; or b) within *settlement areas*, to allow for infilling and minor rounding out of existing development on *partial services* provided that site conditions are suitable for the long-term provision of such services with **no *negative impacts***.	- Additional clarification on the limitations is needed to reflect the municipal involvement, and financial and administrative realities of permitting such servicing solutions. - Explicit reference should be given to existing restrictions on partial servicing. - The reference to 'no negative impacts' is not appropriate in this policy, as there will always be some negative impacts to septic systems. It would be more appropriate to reference the Ontario Building Code.	- Recommend that the policy be modified as follows: "Subject to existing restrictions on partial servicing under legislation, such as the Oak Ridges Moraine Conservation Plan, *partial services* shall only be permitted in the following circumstances: a) where they are necessary to address failed *individual on-site sewage services* and *individual on-site water services* in existing development; or b) within *settlement areas*, to allow for infilling and minor rounding out of existing development on *partial services* provided that site conditions are suitable for the long-term provision of such services ~~with no *negative impacts*~~ in accordance with the Ontario Building Code; and are subject to municipal approvals and suitable administrative and financial arrangements, to the satisfaction of the municipality or Province in areas without municipal organization. "	1, 3

1.6.5.7	Planning for stormwater management shall: a) minimize, or, where possible, prevent increases in contaminant loads; b) minimize changes in water balance and erosion; c) not increase risks to human health and safety and property damage; d) maintain or increase the extent and function of vegetative and pervious surfaces; and e) **promote** stormwater management best practices, including stormwater attenuation and reuse.	- Clauses (a) and (b) can be combined to provide a succinct direction on water. - The current wording in clause (e) is not consistent with other policies related to stormwater management in the PPS, specifically the use of 'promote' vs. 'ensure' in policy 2.2.1.g. These should be made consistent by using the stronger policy language. - The PPS should promote the efficient use of existing infrastructure before additional costly infrastructure is provided. - Stormwater management should abide by some high level principles, including source control, LID and maintaining the hydrologic regime. - There are limited opportunities within urban areas to build new stormwater management systems. The PPS should provide additional information regarding opportunities for cost sharing and coordinating stormwater management systems within urban settings.	- Recommend that the policy be modified as follows: "Planning for stormwater management shall: a) minimize changes to water quality, quantity, and the hydrologic regime to the extent possible ~~minimize, or, where possible, prevent increases in contaminant loads;~~ ~~b) minimize changes in water balance and erosion;~~ c) not increase risks to human health and safety and property damage; d) maintain or increase the extent and function of vegetative and pervious surfaces; ~~and~~ e) ~~promote~~ ensure the use of stormwater management best practices, including stormwater attenuation and reuse; f) promote the efficient use of existing stormwater management facilities prior to the construction of new facilities; and, g) abide by the principles of source control, LID, and maintaining the hydrologic regime." - Recommend that the additional information be provided regarding opportunities for cost sharing and coordinating stormwater management systems within urban systems.	1, 4
1.6.6	**Transportation Systems**	- Part IV of the PPS specifies that the use of active transportation and transit should be increased before other modes of travel. A policy within the PPS should be included for consistency with this principle, so that the hierarchy of transportation users is explicitly defined.	- Recommended that new policies be added, as follows: "Transportation systems should prioritize mode choice in the following order: pedestrians; cyclists; transit; automobiles; and emphasize trip reduction through Transportation Demand Management."	1
1.6.6.1	*Transportation systems* should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.	- The PPS needs to explicitly acknowledge the fundamental importance of accessibility & include it as an important feature of community elements. - The PPS should reinforce the importance of human health within the PPS, especially due to the impact that transportation issues have on air quality.	- Recommended that the policy be modified as follows: "*Transportation systems* should be provided which are safe, accessible, energy efficient, facilitate the movement of people and goods, minimize human health impacts from air pollution in accordance with regulatory standards and are appropriate to address projected needs."	1

1.6.6.2	Efficient use shall be made of existing and planned *infrastructure*, including the use of *transportation demand management* **where feasible**.	- The current wording of this policy implies that *transportation demand management* is a type infrastructure, which is incorrect. The reference to *transportation demand management* should be removed from this policy and added as its own policy in this section. - The language used in this policy needs to be strengthened by deleting "where feasible" and adding "appropriate".	- Recommend that the policy be modified as follows: "Efficient and appropriate use shall be made of existing and planned *infrastructure*~~, including the use of *transportation demand management* where feasible~~." - Recommend that the following new policy be added, and located after the existing 1.6.6.2 policy: "*Transportation Demand Management* techniques and strategies shall be utilized and implemented through context sensitive solutions."	1
1.6.6.4	A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and *active transportation*.	- This policy can provide additional guidance on the hierarchy of transportation, as single occupancy vehicle trips should be the top priority for reduction.	- Recommend that the policy be modified as follows: "A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips, particularly single occupancy vehicle trips, and support current and future use of transit and *active transportation*."	1
1.6.7	**Transportation and Infrastructure Corridors**			
1.6.7.1	Planning authorities shall plan for and protect corridors and rights-of-way for transportation, transit and *infrastructure* facilities to meet current and projected needs.	- To ensure municipalities can effectively plan for all modes of transportation, additional details are required on corridors.	- Recommend that the policy be modified as follows: "Planning authorities shall plan for and protect at-grade and subterranean corridors and rights-of-way for transportation, transit and *infrastructure* facilities to meet current and projected needs."	1
1.6.7.3	Planning authorities shall not permit *development* in ***planned corridors*** that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified. New *development* proposed on *adjacent lands* to existing or *planned corridors* and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid or minimize negative impacts on and from the corridor and transportation facilities.	- The definition of *planned corridors* needs to be clarified as to whether they are strictly provincial roads, or if they could include Regional/ municipal roads.	- See *planned corridors* definition (below).	1
1.6.7.4	The preservation and reuse of abandoned corridors for purposes that maintain the corridor's integrity and continuous linear characteristics should be encouraged, **wherever feasible**.	- This policy should be expanded to include missing and unopened road allowances to allow for effective support of continuous linear corridors. - This policy should be strengthened by removing "wherever feasible".	- Recommend the policy be modified as follows: "The preservation and reuse of abandoned corridors, and missing and unopened road allowances for purposes that maintain the corridor's integrity and continuous linear characteristics should be encouraged~~, wherever feasible~~."	1

1.6.8	**Airports, Rail and Marine Facilities**	- The inclusion of Rail and Marine Facilities in this section is too limited. This policy speaks to land uses in their vicinity, but there are no policies that speak to the planning for rail and marine facilities, or protection for planned improvements or future airport, rail or marine facilities.	- Recommend the addition of new policies related to planning for rail and marine facilities, and for the protection for planned improvements or future airport, rail and marine facilities.	2
1.6.8.1	Planning for land uses in the vicinity of *airports*, *rail facilities* and *marine facilities* shall be undertaken so that their long-term operation and economic role is protected.			
1.6.8.2	*Airports* shall be protected from incompatible land uses and development by: a) prohibiting new residential *development* and other sensitive land uses in areas near *airports* above 30 NEF/NEP, as set out on maps (as revised from time to time) that have been reviewed by Transport Canada; b) considering redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been demonstrated that there will be no negative impacts on the long-term function of the *airport*; and c) discouraging land uses which may cause a potential aviation safety hazard.	- The Provincial standards for NEF in the PPS are different from the Federal regulations, and needs to be harmonized.	- Recommend that the NEF requirements in this policy be replaced by those in the Federal regulations.	3
1.6.9	**Waste Management**	- The Waste Management section is very limited & needs additional details and strong policies to provide appropriate direction on waste management. - It is increasingly important to plan for the space required to provide access to waste management services. The development standards for residential intensification, redevelopment and new residential development should include provisions to ensure residents have equal or better access to waste management and diversion services. In particular, space should be allocated to ensure ease of use and proper servicing of waste management infrastructure, including road allowances, overhead clearances for vehicles, onsite storage, and resident accessibility.	- Recommend that the following policies be added to this Section: "Planning authorities shall ensure that new residential development, intensification, and redevelopment accommodate waste management infrastructure and provide residents with equal or better access to waste management and diversion services that are present within the existing community." "Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion." "Planning authorities shall plan for waste management, diversion services and infrastructure to accommodate the long-term growth of communities." "When developing and providing waste management services, waste reduction and local solutions should be prioritized over waste disposal to authorized landfill facilities."	2

1.6.9.1 *Waste management systems* need to be provided that are of an appropriate size and type to accommodate present and future requirements, and facilitate, encourage and promote reduction, reuse and recycling objectives. Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion. *Waste management systems* shall be located and designed in accordance with provincial legislation and standards.	- The PPS needs to speak to all four tools for waste management through the addition of "recover". - The PPS should include directives that address waste minimization and the progression towards a zero waste society.	- Recommend that the policy be modified as follows: "*Waste management systems* need to be provided that are of an appropriate size and type to accommodate present and future requirements, and facilitate, encourage and promote reduction, reuse, ~~and~~ recycling and recovery objectives as a progression towards a zero waste society. Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion. *Waste management systems* shall be located and designed in accordance with provincial legislation and standards"	1
1.6.10 Energy Supply 1.6.10.1 Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities, to accommodate current and projected needs, and promote *renewable energy systems*, where feasible.	- It is not clear what this policy accomplishes, as municipalities have a limited/no role in this. - The PPS should include energy policies that speak to things municipalities have control over/a role in, like the location of facilities, not just projected energy needs or the development of energy supply. - Planning authorities should always promote energy conservation, in addition to the use of renewable energy systems, when speaking of energy supply. - Policies on district energy should be included, as it provides a means to support efficient energy distribution, generation, community resiliency and waste energy recovery.	- Recommend that this policy be modified as follows: "Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities, to accommodate current and projected needs, and promote energy conservation and *renewable energy systems*, where feasible." - Recommend the addition of new policies that speak to the location of energy facilities/infrastructure.	2
	- Disappointed that the comments submitted by the Canadian District Energy Association in June 2012 were not integrated into the PPS. Recommend that these be included.	- Recommend that a new section and new policies related to District Energy, as submitted through the Canadian District Energy Association in June 2012 be included, as follows: "1.6.11 District Energy 1.6.11.1 A land use pattern, density and mix of uses should be promoted that maximize the long-term security and flexibility of the energy supply and support the development of viable choices and plans for community-based District Energy. 1.6.11.2 Planning authorities shall establish policies to ensure new development is compatible with thermal energy networks, where the use of such networks is feasible. 1.6.11.3 The consideration of community-based thermal energy strategies shall be integrated at all stages of the planning process."	2
1.7 LONG-TERM ECONOMIC PROSPERITY 1.7.1 Long-term economic prosperity should be supported by:	- The economic policies within the PPS should explicitly support the green economy.	- Recommend that the policy be modified as follows: "Long-term economic prosperity should be supported by: a) promoting opportunities for economic development, including a	1, 3, 4

a) promoting opportunities for economic development; b) optimizing the long-term availability and use of land, resources, *infrastructure*, and *public service facilities*; c) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets; d) encouraging a sense of place, through built form, cultural planning and promoting features that help define character, such as **cultural heritage resources**; e) promoting community investment-readiness; f) promoting the redevelopment of *brownfield sites*; g) providing for an efficient, cost-effective, reliable *multi-modal transportation system* that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support the movement of goods and people; h) providing opportunities for sustainable tourism development; i) providing opportunities to support local food, and promoting the sustainability of agri-food and agri-product businesses by protecting agricultural resources, and minimizing land use conflicts; j) promoting energy conservation and providing opportunities for development of energy supply, including the use of *renewable energy systems*; k) minimizing negative impacts from a **changing climate** and considering the ecological benefits provided by nature; and l) encouraging efficient and coordinated communications and telecommunications infrastructure.	- The term 'optimizing' in clause (b) can be easily misinterpreted and should be replaced with clear language. - This policy should recognize the importance of green space and environmentally important areas in creating sense of place, and its impact on long-term economic prosperity. - Clause (d) could be strengthened by ensuring that cultural features are not just promoted, but also protected. - A formal definition of 'cultural heritage resources' should be included to provide further clarification on these elements and acknowledge culture's role in economic prosperity. - Clarification is required in clause (e) to define what is meant by "community investment-ready". - The importance of human health needs to be reinforced in this policy. - Disappointed that the comments submitted by the Canadian District Energy Association in June 2012 were not integrated into the PPS. Recommend that these be included. - Municipalities will have difficulty implementing solutions to the 'impacts of climate change', when they have not been defined. Need clarity on what the issues are, either through a definition and/or through additional support material. - This policy should recognize the importance of a sound natural environment to long-term economic prosperity. - The minimization of waste & proper waste management will ensure the long-term prosperity of communities & economies and should be acknowledged in this policy.	green economy; b) ~~optimizing~~ promoting the long-term availability and use of land, resources, *infrastructure*, and *public service facilities*; c) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets; d) encouraging a sense of place, through built form, green spaces, cultural planning and promoting and protecting features that help define character, such as cultural heritage resources; e) promoting community investment-readiness; f) promoting the redevelopment of *brownfield sites*; g) providing for an efficient, cost-effective, reliable *multi-modal transportation system* that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support the movement of goods and people; h) providing opportunities for sustainable tourism development; i) providing opportunities to support local food, and promoting the sustainability of agri-food and agri-product businesses by protecting agricultural resources, and minimizing land use conflicts; j) promoting energy conservation and providing opportunities for development of energy supply, including the use of *renewable energy systems* and *District Energy* systems; k) minimizing negative impacts from a changing climate and considering the human health and ecological benefits provided by nature; ~~and~~ l) encouraging efficient and coordinated communications and telecommunications infrastructure; m) promoting a healthy, linked natural environment; and, n) providing opportunities for at-source waste diversion and waste minimization." - Recommend the addition of a definition for 'cultural heritage resource'. (See definition section below). - Recommend that clause (e) be modified to clarify what is meant by "community investment-readiness". - Recommend the addition of a definition for 'climate change', including the 'impacts of climate change'. (See definition section below). - And/or, provide additional support material about what the impacts of climate change are.	

1.8 ENERGY CONSERVATION, AIR QUALITY AND CLIMATE CHANGE	- This section will be very difficult to implement. Additional guidance and support is required, including more information on possible tools & how they can be used to address these issues.	- Recommend that additional support material be provided that illustrates the possible tools & how they can be used to address these issues.	3, 4

1.8.1	Planning authorities shall support energy conservation and efficiency, improved air quality, and climate change mitigation and adaptation through land use and development patterns which: a) promote compact form and a structure of nodes and corridors; b) promote the use of *active transportation* and transit in and between residential, employment (including commercial, industrial and institutional uses) and other areas; c) focus major employment, commercial and other travel-intensive land uses on sites which are well served by transit where this exists or is to be developed, or designing these to facilitate the establishment of transit in the future; d) focus freight-intensive land uses to areas well served by major highways, *airports*, *rail facilities* and *marine facilities*; e) improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; f) promote design and orientation which: 1. maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; 2. maximizes opportunities for the use of renewable energy; and 3. takes into account the impacts of **climate change**; and g) maintain or increase vegetation within *settlement areas*, where feasible.	- Green infrastructure and sustainability are intrinsically linked to energy conservation, air quality and climate change, and should be included in this policy/section. - The language in clause (a) should be strengthened by replacing 'promote' with 'direct'. - Clause (c) should be expanded to include active transportation. - Clause (e) should include the link to air quality through vehicular emissions. - Additional clarification is needed in Clause (f) as to what is being directed. - Clause (f).3 needs to be stronger in relation to mitigating climate change. - This policy seems to focus on mitigation, and needs additional details on adaptation and conservation. - Municipalities will have difficulty implementing solutions to the 'impacts of climate change', when they have not been defined. Need clarity on what the issues are, either through a definition and/or through additional support material. - Actions surrounding improving air quality should also include provisions of adequate separation distance between sensitive land uses and sources of emissions. - This policy should include some high level objectives related to climate change.	- Recommend that green infrastructure and sustainability be incorporated into this policy. - Recommend that the policy be modified to better address adaptation and conservation. - Recommend modifying the policy as follows: "Planning authorities shall support energy conservation and efficiency, improved air quality, and climate change mitigation and adaptation through land use and development patterns which: a) ~~promote~~ direct compact form ~~and~~ to a structure of nodes and corridors; b) promote the use of *active transportation* and transit in and between residential, employment (including commercial, industrial and institutional uses) and other areas; c) focus major employment, commercial and other travel-intensive land uses on sites which are well served by transit and active transportation infrastructure, where this exists or is to be developed, or designing these to facilitate the establishment of transit and active transportation infrastructure in the future; d) focus freight-intensive land uses to areas well served by major highways, *airports*, *rail facilities* and *marine facilities*; e) reduce vehicular emissions by improving the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; f) promote street and building design and orientation which: 1. maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; 2. maximizes opportunities for the use of renewable energy; and 3. takes into account and mitigates the impacts of climate change; ~~and~~ g) maintain or increase vegetation within *settlement areas*, where feasible; h) adequately separate sensitive land uses from sources of pollution. i) promote a climate-resilient Province that will adapt well to the impacts of climate change and its challenges." - Recommend the addition of a definition for 'climate change', including the 'impacts of climate change'. (See definition section below). - And/or, provide additional support material about what the impacts of climate change are.	1, 3, 4

2.0 WISE USE AND MANAGEMENT OF RESOURCES Ontario's long-term prosperity, environmental health, and social well-being depend on maintaining biodiversity, protecting the health of the Great Lakes, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. Accordingly:	- This preamble should include Lake Simcoe as a key resource.	- Recommend the addition of Lake Simcoe, as follows: "Ontario's long-term prosperity, environmental health, and social well-being depend on maintaining biodiversity, protecting the health of the Great Lakes and Lake Simcoe, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. "	1
2.1 NATURAL HERITAGE	- There's an overall feeling of disappointment with this section and how little it has changed. We were hoping for more strength and direction in these policies. - This section should include a statement about the core elements of provincial features that cannot be touched, and the host of local systems that need to be protected. This should be a provincial priority. - This section is missing any references to ecosystems services, which are supported by green development management. Municipalities need support to implement this. - Peat extraction should not be permitted, and this needs to be explicitly reinforced within the natural heritage section of the PPS. - It has been demonstrated that natural heritage provides economic, environmental, social and recreational benefits. The policies of the PPS should move beyond 'protection' of natural heritage, and speak to the 'enhancement' of natural heritage. - The importance of natural heritage in urban environments should be highlighted through policy, ensuring adequate planning and protection in the face of the impacts of urbanization and continuous loss of features, and an overall recognition of the importance of these features to communities.	- Recommend that the policies of this section be reviewed and strengthened. - Recommend that the province identify its core elements for protection through policy within the PPS. - Recommend that the following policies be added to this section: "Municipalities be encouraged to develop green development management tools and undertake natural heritage systems mapping." "That the extraction/harvesting of peat be prohibited within *natural heritage systems* and natural areas located within Ontario's southern lowlands, and shall only be permitted outside this area if the peat is to be used for fuel and subject to permits issued by the Provincial Ministry of Natural Resources land use permits." "Natural heritage planning should include the enhancement, expansion and managing of these areas to develop resiliency to outside forces, including destruction through weather events, insects, invasive species and natural disasters." "Natural heritage within urban areas, such as urban trees and urban forests, be planned and protected for the long term, including the importance of these features to healthy communities and considerations for maintaining the quality and linkages of these features in the face of increased urbanization."	1, 2, 3

2.1.1	Natural features and areas shall be protected for the long term.	- Vegetation protection zones should be included in the areas that need to be protected in the long-term, in order to ensure the successful protection of the features and areas themselves.	- Recommend that the policy be modified as follows: "Natural features and areas, including appropriate vegetation protection zones needed to sustain the function of the features, shall be protected for the long term."	1
2.1.2	The diversity and connectivity of natural features in an area, and the long-term *ecological function* and biodiversity of *natural heritage systems*, should be maintained, restored or, where possible, improved, recognizing linkages between and among *natural heritage features and areas*, *surface water features* and *ground water features*.	- Municipalities are currently having difficulty implementing this policy. - Some municipalities do not have the details required to implement this policy for natural heritage systems.	- Recommend that additional support material be made available that include the details of natural features and natural heritage systems within municipalities.	1, 3
2.1.3	*Natural heritage systems* shall be identified in Ecoregions 6E & 7E[1], recognizing that considerations in planning for *natural heritage systems* in *settlement areas*, *rural areas*, and *prime agricultural areas* may vary.	- The changes made to this policy have weakened it, and erode any consistent approach to protection. The only variations should occur because of localized provincial plans, and this should be clearly expressed in this policy.	- Recommend that the policy be modified as follows: "*Natural heritage systems* shall be identified in Ecoregions 6E & 7E[1], recognizing that considerations in planning for *natural heritage systems* in *settlement areas*, *rural areas*, and *prime agricultural areas* may vary due to the requirements of localized provincial plans."	1
2.1.5	*Development* and *site alteration* shall not be permitted in: a) *significant wetlands* in the Canadian Shield north of Ecoregions 5E, 6E and 7E[1]; b) *significant woodlands* in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)[1]; c) *significant valleylands* in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)[1]; d) *significant wildlife habitat*; e) *significant areas of natural and scientific interest*; and f) *coastal wetlands* in Ecoregions 5E, 6E and 7E[1] that are not subject to policy 2.1.4(b) unless it has been demonstrated that there will be no *negative impacts* on the natural features or their *ecological functions*.	- The term "*significant wildlife habitat*" needs to be better explained through the definition for *significant*. - 'No negative impact' is an unreasonable test. The language surrounding this should be modified.	- See *significant* definition (below). - Recommend this policy be modified as follows: "*Development* and *site alteration* shall not be permitted in: a) *significant wetlands* in the Canadian Shield north of Ecoregions 5E, 6E and 7E[1]; b) *significant woodlands* in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)[1]; c) *significant valleylands* in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)[1]; d) *significant wildlife habitat*; e) *significant areas of natural and scientific interest*; and f) *coastal wetlands* in Ecoregions 5E, 6E and 7E[1] that are not subject to policy 2.1.4(b) unless it has been demonstrated that any negative impact is mitigated to the highest standard possible and the *ecological functions* are maintained or enhanced ~~there will be no *negative impacts* on the natural features or their *ecological functions*~~."	1

2.1.8	*Development* and *site alteration* shall not be permitted on *adjacent lands* to the *natural heritage features and areas* identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the *ecological function* of the *adjacent lands* has been evaluated and it has been demonstrated that there will be no *negative impacts* on the natural features or on their *ecological functions*.	- The PPS should speak to vegetation protection zones. This term is used in Provincial technical manuals, and this term would provide additional clarification in the interpretation of these policies.	- Recommend that the policy be modified by either including vegetation protection zones in lieu of adjacent lands, or adding vegetation protection zones into the definition for adjacent lands.	
2.2	**WATER**	- Clause (a) should be strengthened by ensuring that this scale is used not just for the identification of impacts, but also determining required mitigation. - Municipalities need additional support materials to implement clauses (c) and (d). New mapping is required to identify features and maintain linkages. - Clause (e.2) should be expanded to include the protection of all water, not just those that are vulnerable. - Sourcewater protection is incredibly important, and this terminology needs to be explicitly included in the plan, along with the necessary requirement for protection.	- Recommend that additional support materials be created, including new mapping to identify features and linkages. - Recommend that the policy be modified as follows: Planning authorities shall protect, improve or restore the *quality and quantity of water* by: a) using the *watershed* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts and required mitigation of development; b) minimizing potential *negative impacts*, including cross-jurisdictional and cross-*watershed* impacts; c) identifying water resource systems consisting of *ground water features*, *hydrologic functions*, *natural heritage features and areas*, and *surface water features* including shoreline areas, which are necessary for the ecological and hydrological integrity of the *watershed*; d) maintaining linkages and related functions among *ground water features*, *hydrologic functions*, *natural heritage features and areas*, and *surface water features* including shoreline areas; e) implementing necessary restrictions on *development* and *site alteration* to: 1. protect all municipal drinking water supplies and *designated vulnerable areas*; and 2. protect, improve or restore all surface and ground water, including *vulnerable* surface and ground water, *sensitive surface water features* and *sensitive ground water features*, and their *hydrologic functions*; f) protecting all municipal drinking water supplies by implementing sourcewater protection plans; gf) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and hg) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.	1, 3, 4
2.2.1	Planning authorities shall protect, improve or restore the *quality and quantity of water* by: a) using the *watershed* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development; b) minimizing potential *negative impacts*, including cross-jurisdictional and cross-*watershed* impacts; c) identifying water resource systems consisting of *ground water features*, *hydrologic functions*, *natural heritage features and areas*, and *surface water features* including shoreline areas, which are necessary for the ecological and hydrological integrity of the *watershed*; d) maintaining linkages and related functions among *ground water features*, *hydrologic functions*, *natural heritage features and areas*, and *surface water features* including shoreline areas; e) implementing necessary restrictions on *development* and *site alteration* to: 1. protect all municipal drinking water supplies and *designated vulnerable areas*; and 2. protect, improve or restore *vulnerable* surface and ground water, *sensitive surface water features* and *sensitive ground water features*, and their *hydrologic functions*; f) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and g) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.			

2.3	**AGRICULTURE**	- Peat extraction should not be permitted, and this needs to be explicitly reinforced within the agriculture section of the PPS. - Nutrient Management plans are necessary at the source, as a means to control water quality at the source.	- Recommend the addition of new policies as follows: "That the extraction/harvesting of peat be prohibited within *prime agricultural areas* located within Ontario's southern lowlands, and shall only be permitted outside this area if the peat is to be used for fuel and subject to permits issued by the Provincial Ministry of Natural Resources land use permits." "Nutrient Management plans should be developed and implemented for all agricultural uses in accordance with provincial legislation."	2
2.3.1	*Prime agricultural areas* shall be protected for **long-term** use for agriculture. *Prime agricultural areas* are areas where *prime agricultural lands* predominate. *Specialty crop areas* shall be given the highest priority for protection, followed by Canada Land Inventory Classes 1, 2, and 3, and any associated Class 4 to 7 soils within the *prime agricultural area*, in this order of priority.	- The wording in this policy and the definition for *prime agricultural areas* is not immediately clear. To make it easier to understand, the Land Class details should be located in the same spot as the acknowledgement that municipalities can have their own Land Class definitions based on alternative evaluation procedures acceptable to the Province. - Clarification is required on what is meant by "long-term".	- Recommended that either the specifics of the Land Class definition be moved from the policy into the *prime agricultural areas* definition; or, the provision for municipalities to use their own Land Class definition based on a provincially accepted alternative evaluation procedure currently located in the *prime agricultural areas* definition be moved into the policy. - Recommend that the policy be modified to clarify what is meant by "long-term".	1
2.3.3	**Permitted Uses**	-The restriction of 'small scale' in the on-farm diversified uses definition may be problematic by limiting opportunities for food production activities.	- See Definitions comments under *on-farm diversified uses* below.	1
2.3.3.1	In *prime agricultural areas*, permitted uses and activities are: *agricultural uses*, *agriculture-related uses* and ***on-farm diversified uses***. Proposed *agriculture-related uses* and *on-farm diversified uses* shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on guidelines developed by the Province or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.			

2.3.4 Lot Creation and Lot Adjustments 2.3.4.1 Lot creation in *prime agricultural areas* is discouraged and may only be permitted for: a) *agricultural uses*, provided that the lots are of a size appropriate for the type of agricultural use(s) common in the area and are sufficiently large to maintain flexibility for future changes in the type or size of agricultural operations; b) *agriculture-related uses*, provided that any new lot will be limited to a minimum size needed to accommodate the use and appropriate *sewage and water services*; c) a *residence surplus to a farming operation* as a result of farm consolidation, provided that: 1 the new lot will be limited to a minimum size needed to accommodate the use and appropriate *sewage and water services*; and 2 the planning authority ensures that new residential dwellings are prohibited on any vacant remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the vacant remnant parcel may be recommended by the Province, or based on municipal approaches which achieve the same objective; and d) *infrastructure*, where the facility or corridor cannot be accommodated through the use of easements or rights-of-way.	- To ensure consistent application & reduce interpretation/implementation issues, the lot creation policies of the PPS should be consistent with those in either the Greenbelt Plan or the Oak Ridges Moraine Plan.	- Recommended that the Lot Creation policies of the PPS be replaced with the Lot Creation policies found within the Greenbelt or Oak Ridges Moraine Plans.	
2.4 MINERALS AND PETROLEUM	- Based on the language used in the policies of 2.4, there is concern over the municipal role surrounding minerals and petroleum. Municipalities would prefer to have a larger influence on the level of permission given to these uses. - There is mixed messaging regarding *prime agricultural areas*. It is incredibly important to protect these areas, yet mineral and petroleum extraction is permitted, despite knowledge that *prime agricultural lands* cannot be fully rehabilitated. - Peat extraction should not be permitted and this should be explicitly stated in the PPS.	- Recommend that additional policies be added to this section to address municipal influence over these uses. - Recommend the addition of a new policy as follows: "That the extraction/harvesting of peat be prohibited within Ontario's southern lowlands, and shall only be permitted outside this area if the peat is to be used for fuel and subject to permits issued by the Provincial Ministry of Natural Resources land use permits."	1, 3

2.5	**MINERAL AGGREGATE RESOURCES**			
2.5.1	*Mineral aggregate resources* shall be protected for long-term use and *deposits of mineral aggregate resources* shall be identified.	- Based on the language used in the policies of 2.4, there is concern over the municipal role surrounding mineral aggregate resources. Municipalities would prefer to have a larger influence on the level of permission given to these uses. - There is mixed messaging regarding *prime agricultural areas*. It is incredibly important to protect these areas, yet mineral and aggregate resource extraction is permitted, despite knowledge that *prime agricultural lands* cannot be fully rehabilitated.	- Recommend that additional policies be added to this section to address municipal influence over these uses.	1, 3
2.5.2	**Protection of Long-Term Resource Supply**			
2.5.2.2	Extraction shall be undertaken in a manner which minimizes social and environmental impacts.	- The importance of human health should be reinforced in this policy.	- Recommend that the policy be modified as follows: "Extraction shall be undertaken in a manner which minimizes social, human health and environmental impacts."	1
2.5.3	**Rehabilitation**			
2.5.3.2	Rehabilitation in accordance with **established standards** may be taken into consideration in the demonstration of no *negative impacts* for purposes of policies 2.1.5 and 2.1.8 provided that: a) *ecological functions* will be restored, and where possible improved; and b) connectivity of natural features will be restored, and where possible improved.	- The details of this policy need to be clarified – additional details are needed on what 'established standards' are being referred to. - The language of this policy is not strong enough; currently insinuating that rehabilitation may be considered, but is not required.	- Recommended that the policy be modified as follows: "Rehabilitation in accordance with established standards and regulatory requirements ~~may~~ shall be taken into consideration in the demonstration of no *negative impacts* for purposes of policies 2.1.5 and 2.1.8 provided that:: a) *ecological functions* will be restored, and where possible improved; and b) connectivity of natural features will be restored, and where possible improved." - Recommend that additional details be included within the policy that explains what 'established standards' are being referred to.	1, 4
2.5.3.3	*Comprehensive rehabilitation* planning is **encouraged** where there is a concentration of mineral aggregate operations.	- The language in this policy needs to be strengthened by replacing 'encouraged' with 'required. - The language in this policy needs to be clarified to include requirements both the planning and implementation of *comprehensive rehabilitation*. - Additional details are required in the definition for *comprehensive rehabilitation*.	- Recommend that the policy be modified as follows: "*Comprehensive rehabilitation* ~~planning~~ is ~~encouraged~~ required where there is a concentration of mineral aggregate operations." - See *comprehensive rehabilitation* definition below.	1

2.5.4	**Extraction in Prime Agricultural Areas** 2.5.4.1 In *prime agricultural areas*, on *prime agricultural land* outside of *specialty crop areas*, extraction of *mineral aggregate resources* is permitted as an interim use provided that the site will be rehabilitated back to an agricultural condition, so that substantially the same areas and same average soil capability for agriculture are restored. *specialty crop areas* extraction of *mineral aggregate resources* is permitted as an interim use provided that the site will be rehabilitated back to an agricultural condition, which allows for the same range and productivity of specialty crops common in the area; and, where applicable, the microclimate on which the site and surrounding area may be dependent for specialty crop production will be maintained, or restored. In Complete agricultural rehabilitation is not required if: a) outside of a *specialty crop area*, there is a substantial quantity of *mineral aggregate resources* below the water table warranting extraction, or the depth of planned extraction in a quarry makes restoration of pre-extraction agricultural capability unfeasible; b) in a *specialty crop area*, there is a substantial quantity of *high quality mineral aggregate resources* below the water table warranting extraction, and the depth of planned extraction in a quarry makes restoration of pre-extraction agricultural capability unfeasible; c) other alternatives have been considered by the applicant and found unsuitable. The consideration of other alternatives shall include resources in areas of Canada Land Inventory Class 4 to 7 soils, resources on lands identified as *designated growth areas*, and resources on *prime agricultural lands* where rehabilitation is feasible. Where no other alternatives are found, *prime agricultural lands* shall be protected in this order of priority: *specialty crop areas*, Canada Land Inventory Classes 1, 2 and 3; and d) agricultural rehabilitation in remaining areas is maximized.	- This policy needs to be clarified to better explain what it means, especially for clauses (c) and (d). - The term “complete agricultural rehabilitation” is not clear & needs to be defined. - The wording behind this policy has been softened, appearing to permit activity on more lands and without adequate rehabilitation. The language should be strengthened.	- Recommend that the policy be modified to provide additional clarity, especially for clauses (c) and (d). - Recommend the addition of a definition for *complete agricultural rehabilitation* (below). - Recommend that the policy be modified to strengthen the protection of these lands and rehabilitation requirements.	1, 3
2.6	**CULTURAL HERITAGE AND ARCHAEOLOGY** 2.6.1 *Significant built heritage resources* and *significant cultural heritage landscapes* shall be *conserved*.	- Despite having its own section, there are a limited number of policies on ‘cultural heritage’. Additional policies are required to protect its interests and properly represent its importance.	- Recommend that additional policies related to cultural heritage be added to this section to adequately protect its interests.	1

2.6.2	*Development* and *site alteration* shall not be permitted on lands containing *archaeological resources* or *areas of archaeological potential* unless *significant archaeological resources* have been *conserved*.	- Text from the 2005 PPS was deleted and should be reinstated in this policy, to reinforce that development and site alteration cannot impact resources that are being preserved on site. - The 2005 PPS policy text that is recommended to be instated in this policy includes the term "heritage integrity". This term should be clearly defined to ensure consistent interpretation and implementation.	- Recommend that the policy be modified as follows: *"Development* and *site alteration* shall not be permitted on lands containing *archaeological resources* or *areas of archaeological potential* unless *significant archaeological resources* have been *conserved*. Where *significant archaeological resources* are to be preserved on site, only *development* and *site alteration* which maintain the heritage integrity of the site may be permitted." - Recommend the addition of a definition for "integrity" (see definitions below).	1
2.6.4	Planning authorities should consider and promote **archaeological management plans** and **cultural plans** in conserving cultural heritage and archaeological resources.	- The language in this policy needs to be strengthened. - Definitions for 'archaeological management plans' and 'cultural plans' should be provided in the PPS to provide additional guidance and clarity on what is required.	- Recommend that the policy be modified as follows: "Planning authorities ~~should consider and promote~~ shall develop and utilize archaeological management plans and cultural plans in conserving cultural heritage and archaeological resources."	1
2.6.5	Planning authorities should consider the interests of Aboriginal communities in conserving cultural heritage and archaeological resources.	- The language in this policy needs to be strengthened.	- Recommended that the policy be modified as follows: "Planning authorities ~~should~~ shall consider the interests of Aboriginal communities in conserving cultural heritage and archaeological resources."	1
3.0 PROTECTING PUBLIC HEALTH AND SAFETY Ontario's long-term prosperity, environmental health and social well-being depend on reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards. Development shall **generally** be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards. Accordingly:		- The inclusion of the word "generally' has weakened the preamble and should be removed. - Guidelines and criteria, such as cumulative impact assessments, would assist in determining where to direct development in order to protect public health from hazards.	- Recommend that the preamble be modified as follows: "Ontario's long-term prosperity, environmental health and social well-being depend on reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards. Development shall ~~generally~~ be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards. " - Guidelines and criteria, including cumulative impact assessments, should be provided as additional supplemental materials.	1, 4

3.1	**NATURAL HAZARDS** Development shall generally be directed to areas outside of: a) *hazardous lands* adjacent to the shorelines of the *Great Lakes - St. Lawrence River System* and *large inland lakes* which are impacted by *flooding hazards*, *erosion hazards* and/or *dynamic beach hazards*; b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; c) *hazardous sites*; and d) *hazardous lands* associated with high to extreme risk of **wildland fire**.	3.1.1	- The term 'wildland fires' has been newly included and requires a definition.	- Recommend the inclusion of a definition for "wildland fire" (below).	1
3.1.3	Planning authorities shall consider the potential impacts of **climate change** that may increase the risk associated with natural hazards.		- There is a need for all levels of government to prepare coordinated mitigation and adaptation plans for climate change, so we can effectively address its impacts. - Municipalities will have difficulty implementing solutions to the 'impacts of climate change', when they have not been defined. Need clarity on what the issues are, either through a definition and/or through additional support material.	- Recommend modifying the policy as follows: "Planning authorities shall consider the potential impacts of climate change that may increase the risk associated with natural hazards, through the creation and implementation of climate change mitigation and adaptation plans in coordination with other levels of government, agencies and boards." - Recommend the addition of a definition for 'climate change', including the 'impacts of climate change'. (See definition section below). - And/or, provide additional support material about what the impacts of climate change are.	1, 3, 4
3.1.5	*Development* shall not be permitted to locate in *hazardous lands* and *hazardous sites* where the use is: a) an ***institutional use*** associated with hospitals, nursing homes, pre-school, school nurseries, day care and schools; b) an *essential emergency service* such as that provided by fire, police and ambulance stations and electrical substations; and c) uses associated with the disposal, manufacture, treatment or storage of *hazardous substances*.		- The term "institutional use" has a PPS definition that goes beyond the commonly understood definition of an institutional use, into those that are particularly sensitive. The defined term should be re-named "sensitive institutional use" and replaced in this policy.	- Recommend modifying the policy as follows: "*Development* shall not be permitted to locate in *hazardous lands* and *hazardous sites* where the use is: a) a~~n~~ *sensitive institutional use* associated with hospitals, nursing homes, pre-school, school nurseries, day care and schools b) an *essential emergency service* such as that provided by fire, police and ambulance stations and electrical substations; and c) uses associated with the disposal, manufacture, treatment or storage of *hazardous substances*." - Refer to the 'institutional use' definition (below).	1
3.2	**HUMAN-MADE HAZARDS** Development on, abutting or adjacent to lands affected by *mine hazards*; *oil*, *gas and salt hazards*; or former *mineral mining operations*, *mineral aggregate operations* or *petroleum resource operations* may be permitted only if rehabilitation measures to address and mitigate known or suspected hazards are under-way or have been completed.	3.2.1	- Human-made hazards should be expanded to include more than just mining, oil, gas and salt hazards.	- Recommend modifying the policy as follows: "Development on, abutting or adjacent to lands affected by *mine hazards*; *oil*, *gas and salt hazards*; other industrial operations that may impact human health, including those identified by cumulative studies; or former *mineral mining operations*, *mineral aggregate operations* or *petroleum resource operations* may be permitted only if rehabilitation measures to address and mitigate known or suspected hazards are under-way or have been completed."	1

3.2.2	Sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no *adverse effects*.	- This policy should be strengthened by explicitly noting that there are legislated requirements surrounding remediation of sites with contaminants.	- Recommend modifying the policy as follows: "Sites with contaminants in land or water shall be assessed and remediated as necessary and in accordance with legislated requirements prior to any activity on the site associated with the proposed use such that there will be no *adverse effects*."	1
4.0 4.1	**IMPLEMENTATION AND INTERPRETATION** This Provincial Policy Statement applies to all decisions **in respect of the exercise of any authority that affects a planning matter** made on or after <DATE>.	- Some municipalities are concerned that this policy, without further articulation (even beyond that provided in Section 4.2), is unclear. This is not a universally shared concern. The Province may wish to provide additional clarification on what is meant by "in respect of the exercise of any authority that affects a planning matter". Clarification is required to avoid future interpretation issues and disputes. For example, it is unclear if this is only limited to planning applications or decision matters that take place under the Planning Act, such as Zoning By-law Amendments or Official Plan Amendments, or any dealings with the municipality that is in conjunction with, or implements a planning matter, such as subdivision agreements or assignment of servicing allocation.	- Recommend that the policy could be modified to explain what is meant by "in respect of any authority that affects a planning matter".	1

4.2	In accordance with section 3 of the *Planning Act*, a decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Municipal Board, **in respect of the exercise of any authority that affects a planning matter**, "shall be consistent with" this Provincial Policy Statement. Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government "shall be consistent with" this Provincial Policy Statement.	- Some municipalities are concerned that this policy, without further articulation (even beyond that provided in Section 4.2), is unclear. This is not a universally shared concern. The Province may wish to provide additional clarification on what is meant by "in respect of the exercise of any authority that affects a planning matter". Clarification is required to avoid future interpretation issues and disputes. For example, it is unclear if this is only limited to planning applications or decision matters that take place under the Planning Act, such as Zoning By-law Amendments or Official Plan Amendments, or any dealings with the municipality that is in conjunction with, or implements a planning matter, such as subdivision agreements or assignment of servicing allocation.	- Recommend that the policy could be modified to explain what is meant by "in respect of any authority that affects a planning matter".	1
4.3	This Provincial Policy Statement shall be implemented in a manner that is consistent with the recognition and affirmation of existing Aboriginal and treaty rights in section 35 of the *Constitution Act*, *1982*.	- The language of this policy requires additional clarification.	- Recommend that this policy be modified to provide additional clarification on this policy.	1
4.5	In implementing the Provincial Policy Statement, the Minister of Municipal Affairs and Housing may take into account other considerations when making decisions to support strong communities, a clean and healthy environment and the economic vitality of the Province.	- The PPS should include clarification about what "other considerations" could be.	- Recommend the policy be modified, as follows: "In implementing the Provincial Policy Statement, the Minister of Municipal Affairs and Housing may take into account other considerations, as identified as provincial interests in the Planning Act, when making decisions to support strong communities, a clean and healthy environment and the economic vitality of the Province."	1

4.6	The official plan is an important vehicle for implementation of this Provincial Policy Statement. Official plans shall identify provincial interests and set out appropriate land use designations and policies. To determine the significance of some natural heritage features and other resources, evaluation may be required. Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement. The policies of this Provincial Policy Statement continue to apply after adoption and approval of an official plan.	- The modification made to this policy in the Draft PPS seems to erode the strength of municipalities and their official plans. The sentence needs to be reinstated to what was in the 2005 PPS to properly acknowledge the partnership between the Province and municipalities.	- Recommended that the text that was modified and deleted from the PPS, 2005 be reinstated, as follows: "The official plan is ~~an~~ the most important vehicle for implementation of this Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through municipal official plans. Official plans shall identify provincial interests and set out appropriate land use designations and policies… "	1
4.7	Zoning and development permit by-laws are also important for implementation of this Provincial Policy Statement. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and with this Provincial Policy Statement.	- The current language of "shall keep their zoning and development permit by-laws up-to-date" needs to be clarified, as it currently can be interpreted in such a way that municipalities will be kept at the OMB.	- Recommend that the policy needs to be modified to include clarification as to the details of what is meant by "shall keep their zoning and development permit by-laws up-to-date".	1, 3
4.11	*Provincial plans* shall be read in conjunction with the Provincial Policy Statement and **generally** take precedence over policies in this Provincial Policy Statement to the extent of any conflict, in accordance with relevant legislation or regulations. Examples of these are plans created under the *Niagara Escarpment Planning and Development Act*, the *Ontario Planning and Development Act*, *1994*, the *Oak Ridges Moraine Conservation Act*, *2001*, the *Greenbelt Act*, *2005* and the *Places to Grow Act*, *2005*.	- The addition of the word "generally" removes the strength of this policy and should be removed. - There have been implementation issues related to the interpretation of what policies take precedence between the PPS and other Provincial Plans; in addition to the various planning application transition provisions as set out in the enabling legislation/Acts of these Plans. This policy will not address these implementation issues and needs to be more explicit, and either this policy, or another one about this subject, needs to be moved to the beginning of the document. Additional support and clarification is required. - There needs to be an explicit list/hierarchy of what Plans take precedence.	- Recommend that the policy be modified as follows: "*Provincial plans* shall be read in conjunction with the Provincial Policy Statement and ~~generally~~ take precedence over policies in this Provincial Policy Statement to the extent of any conflict, in accordance with relevant legislation or regulations. Examples of these are plans created under the *Niagara Escarpment Planning and Development Act*, the *Ontario Planning and Development Act*, *1994*, the *Oak Ridges Moraine Conservation Act*, *2001*, the *Greenbelt Act*, *2005* and the *Places to Grow Act*, *2005*." - Recommend that this policy be modified to explicitly include a list/hierarchy of what takes precedence between the PPS and other Provincial Plans. - Recommend that either this policy, or an additional policy about the precedence of provincial plans, should be better highlighted and perhaps moved to a more prominent location in the PPS.	1, 3, 4

4.13	The Province, in consultation with municipalities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies. The Province shall monitor their implementation, including reviewing performance indicators concurrent with any review of this Provincial Policy Statement.	- This policy should be strengthened by explicitly clarifying that various Ministries of the Province will also work in coordination/consultation with one another.	- Recommend that the policy should be modified as follows: "The Province, in consultation with its Ministries, municipalities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies. The Province shall monitor their implementation, including reviewing performance indicators concurrent with any review of this Provincial Policy Statement."	1
6.0	**DEFINITIONS**	- Disappointed that the comments submitted by the Canadian District Energy Association in June 2012 were not integrated into the PPS. Recommend that these be included.	- Recommend that new definitions related to District Energy, as submitted through the Canadian District Energy Association in June 2012 be included, as follows: "**District Energy:** Means systems that generate and distribute thermal energy (heating and/or cooling) at a community scale. The infrastructure includes a localized centre where the thermal energy is generated, and a network of buried insulated pipes (the thermal grid) that distribute that energy to buildings within a defined geographic area. The medium for transmitting the thermal energy along the thermal grid is either steam (for legacy systems), or water (for modern systems). The thermal grid enables the application of heat recovery strategies (such as combined heat and power, waste heat capture), community-scale thermal storage, and the use of alternative and renewable fuel sources. **Combined heat and power (CHP or cogeneration):** Means a process that simultaneously produces electricity and useful heat. This process works by recovering waste heat from electricity generation, and distributing that heat through the thermal grid."	2
Adjacent lands: means a) for the purposes of policy 1.6.7.3, those lands contiguous to existing or planned corridors and transportation facilities where *development* would have a negative impact on the corridor or facility. The extent of the *adjacent lands* may be recommended in guidelines developed by the Province or based on municipal approaches that achieve the same objectives; b) for the purposes of policy 2.1.8, those lands contiguous to a specific *natural heritage feature or area* where it is likely that *development* or *site alteration* would have a *negative impact* on the feature or area. The extent of the *adjacent lands* may be recommended by the Province or based on municipal approaches which achieve the same objectives; c) for the purposes of policy 2.4.2.2 and 2.5.2.5, those lands contiguous to lands on the surface of known *petroleum resources*, *mineral deposits*, or *deposits of mineral aggregate resources* where it is likely that *development* would constrain future access to the resources. The extent of the *adjacent lands* may be recommended by the Province; and d) for the purposes of policy 2.6.3, those lands contiguous to a *protected heritage property* or as otherwise defined in the municipal official plan.		- The PPS should speak to vegetation protection zones. This term is used in Provincial technical manuals, and this term would provide additional clarification in the interpretation of these policies.	- Recommend modifying this definition by including vegetation protection zones, for the purposes of policy 2.1.8.	

Affordable: means a) in the case of ownership housing, the least expensive of: 1. housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for *low and moderate income households*; or 2.housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the *regional market area*; b) in the case of rental housing, the least expensive of: 1. a unit for which the rent does not exceed 30 percent of gross annual household income for *low and moderate income households*; or 2. a unit for which the rent is at or below the average market rent of a unit in the *regional market area*.	- There isn't enough information in this definition for local municipalities to properly implement this definition and related policies. Additional support materials are required to assist local municipalities.	- Recommend that the definition be modified to provide additional clarification for local municipalities to implement related policies. - Recommend that additional support materials be created for local municipalities, including templates that can be used to determine affordability.	1, 3, 4
	- A definition for 'archaeological management plan' would provide additional clarification on what is expected in these plans. - Additional clarification could also be presented through additional supplementary materials to the PPS.	- Recommend the addition of a definition for "archaeological management plan" and/or additional supplementary materials for this topic.	1, 3, 4
	- A definition is required to clarify what is meant by "climate change" and the "impacts of climate change". This term needs to be defined to help municipalities identify how to best implement policies that will affect these impacts. - Additional clarification could also be presented through additional supplementary materials to the PPS. - This is a complex term, and its definition will have significant implications for how municipalities implement related policies. Municipalities would like this definition to be part of a future review/ discussion, prior to the release of the final PPS. - This definition may be too complex to have a single application across the Province. The PPS definition should provide clear direction on this term, including parameters for a further municipal-level definition.	- Recommend the addition of a definition for "climate change" or "impacts of climate change", similar to that provided by the Expert Panel on Climate Change and the Ministry of the Environment's Climate Ready plan. Additional supplementary materials should also be provided to identify how best to interpret and implement related policies.	1, 3, 4

	- Policy 2.5.4.1 requires additional detail on what is meant by "complete agricultural rehabilitation".	- Recommend the addition of a definition for "complete agricultural rehabilitation".	1
Comprehensive rehabilitation: means **rehabilitation** of land from which *mineral aggregate resources* have been extracted that is coordinated and complementary, to the extent possible, with the rehabilitation of other sites in an area where there is a high concentration of *mineral aggregate operations*.	- Additional clarification is required for this definition, to describe what 'rehabilitation' means. - The language of the current policy does not set adequate standards for rehabilitation. The current interpretation allows for rehabilitation that is only as good as surrounding sites, which may not be to a sufficient amount.	- Recommend that the definition be modified, as follows: "means rehabilitation of land from which *mineral aggregate resources* have been extracted that is coordinated and complementary, to the extent possible, with the rehabilitation of other sites ~~in an area where there is a high concentration of *mineral aggregate operations.*~~" - Recommend that the policy be modified to explain what is meant by rehabilitation, or the addition of a definition for rehabilitation in the PPS.	1, 3

Comprehensive review: means a) for the purposes of policies 1.1.3.8 and 1.3.2.2, an official plan review which is initiated by a planning authority, or an official plan amendment which is initiated or adopted by a planning authority, which: 1. is based on a review of population and employment projections and which reflect projections and allocations by upper-tier municipalities and *provincial plans*, where applicable; considers alternative directions for growth or development; and determines how best to accommodate the development while protecting provincial interests; 2. utilizes opportunities to accommodate projected growth or development through *intensification* and *redevelopment*; **and considers physical constraints to accommodating the proposed development within existing *settlement area* boundaries**; 3. is integrated with planning for *infrastructure* and *public service facilities*, and considers financial viability over the life cycle of these assets; 4. confirms sufficient water quality, quantity and assimilative capacity of receiving water are available to accommodate the proposed development; 5. confirms that sewage and water services can be provided in accordance with policy 1.6.5; and 6. considers cross-jurisdictional issues. b) for the purposes of policy 1.1.5, means a review undertaken by a planning authority or comparable body which: 1. addresses long-term population projections, *infrastructure* requirements and related matters; 2. confirms that the lands to be developed do not comprise *specialty crop areas* in accordance with policy 2.3.2; and 3. considers cross-jurisdictional issues. In undertaking a *comprehensive review* the level of detail of the assessment should correspond with the complexity and scale of the proposal.	- This PPS definition conflicts with the policy within the Growth Plan. - Interpretation of this definition allows for reviews to be initiated by the private sector, which should not be allowed. Comprehensive reviews should always be implemented by municipalities. - Clause 2 of this definition requires additional clarification. The term "physical constraints" is too broad, and the intent of this needs to be clearer. It is also unclear whether the potential cost to overcome physical constraints should also be considered.	- Recommend that the definition be modified to provide additional clarity around the intent of the term "physical constraints". - Recommend that the definition be modified as follows: "a) for the purposes of policies 1.1.3.8 and 1.3.2.2, an official plan review which is initiated by a planning authority, or an official plan amendment which is initiated ~~or adopted~~ by a planning authority, which: 1. is based on a review of population and employment projections and which reflect projections and allocations by upper-tier municipalities and *provincial plans*, where applicable; considers alternative directions for growth or development; and determines how best to accommodate the development while protecting provincial interests; 2. utilizes opportunities to accommodate projected growth or development through *intensification* and *redevelopment*; and considers physical constraints to accommodating the proposed development within existing *settlement area* boundaries; 3. is integrated with planning for *infrastructure* and *public service facilities*, and considers financial viability over the life cycle of these assets; 4. confirms sufficient water quality, quantity and assimilative capacity of receiving water are available to accommodate the proposed development; 5. confirms that sewage and water services can be provided in accordance with policy 1.6.5; and 6. considers cross-jurisdictional issues. b) for the purposes of policy 1.1.5, means a review undertaken by a planning authority or comparable body which: 1. addresses long-term population projections, *infrastructure* requirements and related matters; 2. confirms that the lands to be developed do not comprise *specialty crop areas* in accordance with policy 2.3.2; and 3. considers cross-jurisdictional issues. In undertaking a *comprehensive review* the level of detail of the assessment should correspond with the complexity and scale of the proposal."	1, 3

Conservation: means a) the recovery and recycling of manufactured materials derived from mineral aggregates (e.g. glass, porcelain, brick, concrete, asphalt, slag, etc.), for re-use in construction, manufacturing, industrial or maintenance projects as a substitute for new mineral aggregates; and b) the wise use of mineral aggregates including utilization or extraction of on-site *mineral aggregate resources* prior to development occurring.	- The term 'conservation' has implications for many facets of provincial interest. Because this definition is only used as it relates to mineral aggregate resources, the definition should be modified to explicitly link it to particular policies, and increase readability of this definition.	- Recommend that the definition be modified as follows: "means, for the purposes of policy 2.5.2.3: a) the recovery and recycling of manufactured materials derived from mineral aggregates (e.g. glass, porcelain, brick, concrete, asphalt, slag, etc.), for re-use in construction, manufacturing, industrial or maintenance projects as a substitute for new mineral aggregates; and b) the wise use of mineral aggregates including utilization or extraction of on-site *mineral aggregate resources* prior to development occurring. "	1
Conserved: means the identification, protection, use and/or management of cultural heritage and archaeological resources in a manner that ensures their cultural heritage value, or interest is retained under the *Ontario Heritage Act*. This may be achieved by the implementation of recommendations sent out in a conservation plan, archaeological assessment, and/or heritage impact assessment, which may include mitigative measures and/or alternative development approaches.	- Reference should be removed to the Ontario Heritage Act (OHA). The definitions of "built heritage resources" and "cultural heritage landscapes" in the PPS indicate that they may be identified through a designation under the OHA, but that they can also be listed properties (and not designated), and in the case of landscapes, areas that have cultural heritage value but are not designated under the OHA. Since this definition for "conserved" focuses on their value or interest under the OHA, there is not a consistent message on determining the value and interest. - This definition includes a typo ("sent" should be "set"). - In the list of "a conservation plan, archaeological assessment and/or heritage impact assessment", the definition should be modified to indicate that these are not the only manner in which these objectives can be achieved.	- Recommend that the definition be modified by clarifying the discrepancies that exist between the definitions for "conserved", "built heritage resources" and "cultural heritage landscapes", in respect to their value and interest, and the OHA. - Recommend that the definition be modified as follows: "means the identification, protection, use and/or management of cultural heritage and archaeological resources in a manner that ensures their cultural heritage value, or interest is retained under the *Ontario Heritage Act*. This may be achieved by the implementation of recommendations set ~~sent~~ out in a conservation plan, archaeological assessment, and/or heritage impact assessment or other means, which may include mitigative measures and/or alternative development approaches."	1
	- A definition for 'cultural heritage resources' would further solidify culture as important within the PPS and provide direction on the facets that are important.	- Recommend the addition of a definition for "cultural heritage resource" that acknowledges the accepted categories of cultural assets used by the Provincial and Federal governments.	1

	- A definition for 'cultural plan' would provide additional clarification on what is expected in these plans. - Additional clarification could also be presented through additional supplementary materials to the PPS.	- Recommend the addition of a definition for "cultural plan" and/or additional supplementary material for this topic.	1, 3
Development: means the creation of a new lot, a change in land use, or the construction of buildings and structures requiring approval under the *Planning Act*, but does not include: a) activities that create or maintain *infrastructure* authorized under an environmental assessment process; b) works subject to the *Drainage Act*; or c) for the purposes of policy 2.1.4(a), underground or surface mining of *minerals* or advanced exploration on mining lands in *significant areas of mineral potential* in Ecoregion 5E, where advanced exploration has the same meaning as under the *Mining Act*. Instead, those matters shall be subject to policy 2.1.5(a).	- This definition, especially when referenced in Sections 2.1, 2.2, 2.6 and 3.1, should be consistent with the definition provided in the Greenbelt Plan, the Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan.	- Modify the definition to ensure consistency with the definition of Development within the Greenbelt Plan, the Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan.	1
Employment area: means those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities.	- The current definition is too broad. It does not limit the uses that can be included in employment areas and has caused implementation issues for municipalities.	- Recommend that the definition be modified as follows: "means those areas designated in an official plan for clusters of business and economic activities including, ~~but not limited to,~~ manufacturing, warehousing, offices, and associated retail and ancillary facilities."	1, 3
Flooding hazard: means the inundation, under the conditions specified below, of areas adjacent to a shoreline or a river or stream system and not ordinarily covered by water: a) Along the shorelines of the Great Lakes -St. Lawrence River System and large inland lakes, the flooding hazard limit is based on the *one hundred year flood level* plus an allowance for *wave uprush* and *other water-related hazards*; b) Along river, stream and small inland lake systems, the flooding hazard limit is the greater of: 1 the flood resulting from the rainfall actually experienced during a major storm such as the Hurricane Hazel storm (1954) or the Timmins storm (1961), transposed over a specific watershed and combined with the local conditions, where evidence suggests that the storm event could have potentially occurred over watersheds in the general area; 2 the *one hundred year flood*; and 3 a flood which is greater than 1. or 2. which was actually experienced in a particular watershed or portion thereof as a result of ice jams and which has been approved as the standard for that specific area by the Minister of Natural Resources; except where the use of the *one hundred year flood* or the actually experienced event has been approved by the Minister of Natural Resources as the standard for a specific watershed (where the past history of flooding supports the lowering of the standard).	- Include consideration of climate change impacts.	- Recommend that the definition be modified to include consideration of climate change impacts to flooding hazards.	1

	- The Province promotes a green economy, businesses and industries. This should be defined within the PPS to provide context on how municipalities can implement related policies.	- Recommend that a definition for "green" as it refers to the economy, businesses and industries be included within the PPS.	1
Habitat of endangered species and threatened species: means a) with respect to a species listed on the Species at Risk in Ontario List as an endangered or threatened species for which a regulation made under clause 55(1)(a) of the *Endangered Species Act*, *2007* is in force, the area prescribed by that regulation as the habitat of the species; or b) with respect to any other species listed on the Species at Risk in Ontario List as an endangered or threatened species, an area on which the species depends, directly or indirectly, to carry on its life processes, including life processes such as reproduction, rearing, hibernation, migration or feeding, as approved by the Ontario Ministry of Natural Resources; and c) places in the areas described in clause (a) or (b), whichever is applicable, that are used by members of the species as dens, nests, hibernacula or other residences.	- This definition appears to be taken directly from the provincial *Endangered Species Act*. Section 2.1.4 of the PPS (Natural Heritage section referring to development and site alteration) has been modified to remove reference to habitat of endangered or threatened species, and a new subsection 2.1.7 has been added which states "Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements". Given the reference to federal requirements in this policy, should the associated definition be expanded to include habitat definitions under the *Species at Risk Act*, or at least as it relates to Schedule 1 species, or is this new subsection only intended for provincially designated species at risk?	- Recommend that the policy be modified to include Federal requirements under the *Species at Risk Act*.	1
Infrastructure: means physical structures (facilities and corridors) that form the foundation for development. *Infrastructure* includes: sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications, transit and transportation corridors and facilities, oil and gas pipelines and associated facilities.	- Renewable energy should be better integrated into Section 1.6 "Infrastructure and Public Service Facilities", and can be done through the addition of renewable energy to the definition for infrastructure. - Disappointed that the comments submitted by the Canadian District Energy Association in June 2012 were not integrated into the PPS. Recommend that these be included.	- Recommend that the definition be modified as follows: "means physical structures (facilities and corridors) that form the foundation for development. *Infrastructure* includes: sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, *renewable energy systems*, electricity and thermal energy generation facilities, ~~electricity~~ transmission and distribution systems, communications/telecommunications, transit and transportation corridors and facilities, ~~oil and gas pipelines~~ gaseous and liquid fuel distribution and associated facilities."	1

	- A definition for 'integrity', specifically in reference to "heritage integrity", would provide additional clarification on what is expected when "maintaining the heritage integrity" - Additional clarification could also be presented through additional supplementary materials to the PPS.	- Recommend the addition of a definition for "integrity" (or "heritage integrity") and/or additional supplementary materials for this topic.	1, 3, 4
Institutional use: means land uses where there is a threat to the safe evacuation of the sick, the elderly, the physically challenged or the young during an emergency as a result of flooding, failure of floodproofing measures or protection works, or erosion.	- The term "institutional use" is only italicized in one instance (policy 3.1.5.a). This definition goes beyond the commonly understood definition of an institutional use, into those that are particularly sensitive. The defined term should be re-named "sensitive institutional use" and replaced in policy 3.1.5.a.	- Recommend keeping the contents of the definition the same, but re-naming the defined term to be "Sensitive institutional use". - The defined term in policy 3.1.5.a should also be replaced with "sensitive institutional use".	1
Major facilities: means facilities which may require separation from *sensitive land uses*, including but not limited to *airports*, transportation infrastructure and corridors, *rail facilities*, *marine facilities*, sewage treatment facilities, *waste management systems*, oil and gas pipelines, industries, and resource extraction activities.	- Additional clarification is required about how "transportation infrastructure and corridors" is defined.	- Recommend that the term "transportation infrastructure and corridors" within this definition be defined during the development of the Corridor Protection Guidelines or other guidelines on separation distances of sensitive land uses from major facilities.	
Major goods movement facilities and corridors: means transportation facilities and corridors associated with the inter-and intra-provincial movement of goods. Examples include: inter-modal facilities, ports, *airports, rail facilities*, freight corridors, freight facilities, and haul routes and primary transportation corridors used for the movement of goods. **Approaches that are freight-supportive** may be recommended in guidelines developed by the Province or based on municipal approaches that achieve the same objectives.	- This definition refers to "approaches that are freight-supportive", but this requires additional clarification to explain what is meant by that term.	- Recommend that supplemental information be created to explain what freight-supportive approaches are, or to provide a definition for freight-supportive approaches	1, 4
Multi-modal transportation system: means a transportation system which may include several forms of transportation such as automobiles, walking, trucks, cycling, buses, rapid transit, rail (such as commuter and freight), air and marine.	- This definition could be aided by the addition of public transit and carpooling as examples.	- Recommend that the definition be modified as follows: "means a transportation system which may include several forms of transportation such as automobiles, walking, trucks, cycling, carpooling, public transit (e.g. buses, rapid transit), rail (such as commuter and freight), air and marine."	1

Negative impacts: means a) in regard to policy 1.6.5.4 and 1.6.5.5, degradation to the *quality and quantity of water*, *sensitive surface water features* and *sensitive ground water features*, and their related *hydrologic functions*, due to single, multiple or successive *development*. *Negative impacts* should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards; b) in regard to policy 2.2, degradation to the *quality and quantity of water*, *sensitive surface water features* and *sensitive ground water features*, and their related *hydrologic functions*, due to single, multiple or successive *development* or *site alteration* activities; c) in regard to *fish habitat*, the harmful alteration, disruption or destruction of *fish habitat*, except where, in conjunction with the appropriate authorities, it has been authorized under the *Fisheries Act*, using the guiding principle of no net loss of productive capacity; and d) in regard to other *natural heritage features and areas*, degradation that threatens the health and integrity of the natural features or *ecological functions* for which an area is identified due to single, multiple or successive *development* or *site alteration* activities.	- Include negative impacts on human health.	- Recommend that the definition be modified as follows: "means, a) in regard to policy 1.6.5.4 and 1.6.5.5, degradation to the *quality and quantity of water*, *sensitive surface water features* and *sensitive ground water features*, and their related *hydrologic functions*, due to single, multiple or successive *development*. *Negative impacts* should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards; b) in regard to policy 2.2, degradation to the *quality and quantity of water*, *sensitive surface water features* and *sensitive ground water features*, and their related *hydrologic functions*, due to single, multiple or successive *development* or *site alteration* activities; c) in regard to *fish habitat*, the harmful alteration, disruption or destruction of *fish habitat*, except where, in conjunction with the appropriate authorities, it has been authorized under the *Fisheries Act*, using the guiding principle of no net loss of productive capacity~~; and~~ d) in regard to other *natural heritage features and areas*, degradation that threatens the health and integrity of the natural features or *ecological functions* for which an area is identified due to single, multiple or successive *development* or *site alteration* activities; and, e) in regard to policy 1.1.3.2, negative impacts includes human health impacts related to air, water and climate change."	
On-farm diversified uses: means **small scale** uses that are secondary to the principle use of the property and help support the farm. *On-farm diversified uses* include, but are not limited to, home occupations, home industries, *agri-tourism uses*, and uses that produce **value-added** agricultural products from the farm operation.	- The definition of scale in this definition may be problematic for the implementation of related policies and potential benefits to agricultural areas; and should be defined by local municipalities - Further clarification needs to be provided on what is required for something to be considered a "value-added" agricultural product.	- Recommend that the definition be modified as follows: "means ~~small scale~~ uses, of a scale defined by local municipalities, that are secondary to the principle use of the property and help support the farm. *On-farm diversified uses* include, but are not limited to, home occupations, home industries, *agri-tourism uses*, and uses that produce value-added agricultural products from the farm operation. " - Recommend that the definition be modified to provide additional details on what "value-added" entails/requires.	1, 3
One hundred year flood: for *river*, *stream and small inland lake systems*, means that flood, based on an analysis of precipitation, snow melt, or a combination thereof, having a return period of 100 years on average, or having a 1% chance of occurring or being exceeded in any given year.	- There is an opportunity to link this definition to climate change, through the impacts of climate change & infrastructure design in the face of climate change.		1

Planned corridors: means corridors or future corridors which are required to meet projected needs, and are identified through *provincial plans*, preferred alignment(s) determined through the *Environmental Assessment Act* process, or identified through planning studies where the Ontario Ministry of Transportation is actively pursuing the identification of a corridor. Approaches for the protection of *planned corridors* may be recommended in guidelines developed by the Province.	- The issue of whether "planned corridors" refer to only provincial corridors was raised in mediation on the Regional Official Plan, in reference to policy 7.2.52. In this case, the policy was modified to refer specifically to "provincial" corridors. - This definition needs to clarify whether planned corridors must be provincial roads, or if Regional/local roads may also be included. - This definition requires additional transparency on municipal interests, and municipal Master Plans should be used to solidify this in the policy.	- Recommended that the definition be modified as follows: "means provincial corridors or future provincial corridors which are required to meet projected needs, and are identified through *provincial plans* and approved Master Plan(s) by upper or single-tier municipalities as defined by a Municipal Class Environmental Assessment, preferred alignment(s) determined through the *Environmental Assessment Act* process, or identified through planning studies where the Ontario Ministry of Transportation is actively pursuing the identification of a corridor. Approaches for the protection of *planned corridors* may be recommended in guidelines developed by the Province."	1
Quality and quantity of water: is measured by indicators associated with hydrologic function such as minimum base flow, depth to water table, aquifer pressure, oxygen levels, suspended solids, temperature, bacteria, nutrients and hazardous contaminants, and hydrologic regime.	- The term 'bacteria' is too restrictive and should be modified to "microorganisms'.	- Recommend modifying the definition as follows: "is measured by indicators associated with hydrologic function such as minimum base flow, depth to water table, aquifer pressure, oxygen levels, suspended solids, temperature, microorganisms ~~bacteria~~, nutrients and hazardous contaminants, and hydrologic regime."	1
Recreation: means leisure time activity undertaken in built or natural settings for purposes of physical activity, health benefits, sport participation and skill development, personal enjoyment, positive social interaction and the achievement of human potential.	- Cultural resources should be formally recognized within the PPS as being important in Ontario's land use planning system.	- Recommend that the definition be modified to include cultural activities as a form of recreation.	1
Renewable energy systems: means a system that generates electricity from an energy source that is renewed by natural processes including, but not limited to, wind, water, biomass, biogas, solar energy and geothermal energy.	- The PPS should explicitly include energy from waste as a possible renewable energy system. - Disappointed that the comments submitted by the Canadian District Energy Association in June 2012 were not integrated into the PPS. Recommend that these be included.	- Recommend that the definition be modified as follows: "means a system that generates electricity or thermal energy from an energy source that is renewed by natural processes including, but not limited to, wind, water, biomass, biogas, energy from waste, solar energy and geothermal energy."	1

	- The term “resilient” and “resilience” have been used throughout the PPS, but need to be defined for the proper interpretation and implementation of related policies. - This is a complex term, and its definition will have significant implications for how municipalities implement related policies. Municipalities would like this definition to be part of a future review/ discussion, prior to the release of the final PPS. - This definition may be too complex to have a single application across the Province. The PPS definition should provide clear direction on this term, including parameters for a further municipal-level definition.	- Recommend the addition of a new definition for “resilient” and/or “resilience”. This definition should provide clear direction on the Provincial intent of this term, while allowing for municipalities to further refine the definition for the municipal-level context. - Recommend that additional supporting material be made available on the topic of “resilience”, to further explain this complex concept.	1. 3. 4
	- A definition for “secondary suites” should be added to the PPS to aid in the interpretation of related policies.	- Recommend that a new definition for “secondary suites” be added.	1
Sensitive land uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more *adverse effects* from contaminant discharges generated by a nearby *major facility*. *Sensitive land uses* may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities.	- The current definition is too specific by limiting adverse effects to those caused by “contaminant discharges”. Adverse effects can also be caused by a number of other types of contaminants including noise and vibrations, which should be included in this definition.	- Recommend that the definition be modified as follows: “means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more *adverse effects* ~~from contaminant discharges generated~~ caused by a nearby *major facility*. *Sensitive land uses* may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities.”	1

Significant: means a) in regard to *wetlands*, *coastal wetlands* and *areas of natural and scientific interest*, an area identified as provincially significant by the Ontario Ministry of Natural Resources using evaluation procedures established by the Province, as amended from time to time; b) in regard to *woodlands*, an area which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or due to the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history. These are to be identified using criteria established by the Ontario Ministry of Natural Resources. c) in regard to other features and areas in policy 2.1, ecologically important in terms of features, functions, representation or amount, and contributing to the quality and diversity of an identifiable geographic area or *natural heritage system*; d) in regard to *mineral* potential, an area identified as provincially significant through evaluation procedures developed by the Province, as amended from time to time, such as the Provincially Significant Mineral Potential Index; and e) in regard to cultural heritage and archaeology, resources that are valued for the important contribution they make to our understanding of the history of a place, an event, or a people. Criteria for determining significance for the resources identified in sections (c)-(e) are recommended by the Province, but municipal approaches that achieve or exceed the same objective may also be used. While some significant resources may already be identified and inventoried by official sources, the significance of others can only be determined after evaluation.	- Additional details are required in this definition to aid in the interpretation of "significant wildlife habitat"; and should be added as an additional clause. - Why is the sole criteria for identifying significant woodlands determined by the Ministry of Natural Resources? This approach may not allow enough flexibility.	- Recommend that this definition be modified to include an additional clause that defines *significant* in respect to *significant wildlife habitats*. - Recommend that this definition be modified to refer to other sources for significant woodland criteria.	1
Site alteration: means activities, such as grading, excavation and the placement of fill that would change the landform and natural vegetative characteristics of a site. For the purposes of policy 2.1.4(a), *site alteration* does not include underground or surface mining of *minerals* or advanced exploration on mining lands in *significant areas of mineral potential* in Ecoregion 5E, where advanced exploration has the same meaning as in the *Mining Act*. Instead, those matters shall be subject to policy 2.1.5(a).	- This definition, especially when referenced in Sections 2.1, 2.2, 2.6 and 3.1, should be consistent with the definition provided in the Greenbelt Plan, the Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan.	- Modify the definition to ensure consistency with the definition of Development within the Greenbelt Plan, the Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan.	1
Transportation demand management: means a set of strategies that result in more efficient use of the *transportation system* by influencing travel behaviour by mode, time of day, frequency, trip length, regulation, route, or cost.	- To aid in the interpretation of this definition, the examples of transportation demand management found within the Growth Plan should be included. - Greater emphasis should be placed within this definition on the reduction of trips.	- Recommended that the definition be modified to include the examples found in the Growth Plan's definition for *transportation demand management*, as follows: "means a set of strategies that result in the reduction of the overall number of trips and/or number of trips at certain time periods and/or transportation facilities that are at capacity, or a more efficient use of the *transportation system* by influencing travel behaviour by mode, time of day, frequency, trip length, regulation, route, or cost. Examples include, but are not limited to: carpooling, vanpooling, and shuttle buses; parking management; site design and on-site facilities that support transit and walking; bicycling facilities and programs; pricing (road tolls or transit discounts); flexible working hours; telecommuting; high occupancy vehicle lanes; park-and-ride; incentives for ride-sharing, using transit, walking and cycling; initiatives to discourage drive-alone trips by residents, employees, visitors, and students."	1

Transportation system: means a system consisting of facilities, corridors and rights-of-way for the movement of people and goods, and associated transportation facilities including transit stops and stations, sidewalks, cycle lanes, bus lanes, high occupancy vehicle lanes, *rail facilities*, parking facilities, park'n'ride lots, service centres, rest stops, vehicle inspection stations, inter-modal facilities, harbours, *airports*, *marine facilities*, ferries, canals and associated facilities such as storage and maintenance.	- Subways should be included in this policy as an example of a facility in the transportation system.	- Recommend that the definition be modified as follows: "means a system consisting of facilities, corridors and rights-of-way for the movement of people and goods, and associated transportation facilities including transit stops and stations, sidewalks, cycle lanes, bus lanes, high occupancy vehicle lanes, subway facilities, *rail facilities*, parking facilities, park'n'ride lots, service centres, rest stops, vehicle inspection stations, inter-modal facilities, harbours, *airports*, *marine facilities*, ferries, canals and associated facilities such as storage and maintenance."	1
	- The term "wildland fire" has been newly added to the PPS and requires a definition for proper interpretation.	- Recommend the addition of a new definition for "wildland fire".	1
PPS Review Cycle	- Other Provincial reviews are every 10 years, it would be appropriate that they occur at that time; with the provision to allow for mid-term reviews/updates when new provincial interests are determined. - The current PPS review cycle timeframe has municipalities dealing with changes to the PPS while still at the OMB from previous provincial plan changes. - Keeping up with the changing nature of Ontario's planning policy context is taxing municipal staff resources, as Provincial Plans are not coordinated. Coordinated review cycles would be more effective.		5

Draft Sept. 2012 Provincial Policy Statement Review

TABLE 2
SUPPLEMENTARY COMMENTS

Draft PPS, Sept 2012 *Note: Bolded words were added to provide reference to comments	Comment/Rationale	Details of Suggested Changes	Question #
Part IV: VISION FOR ONTARIO'S LAND USE PLANNING SYSTEM	- The PPS should speak to the four pillars of sustainability, reinforcing the important role of culture within the Province.	- Recommend that this section be modified to include the four pillars of sustainability, reinforcing the important role of culture.	1
The long-term prosperity and social well-being of Ontarians depend on maintaining strong, sustainable and **resilient** communities, a clean and healthy environment and a strong economy. Ontario is a vast province with diverse urban, rural and northern communities which may face different challenges related to diversity in population levels, economic activity, pace of growth and physical and natural conditions. Some areas face challenges related to maintaining population and diversifying their economy, while other areas face challenges related to accommodating and managing the development and population growth which is occurring, while protecting important resources and the quality of the natural environment. The Provincial Policy Statement reflects this diversity, which includes the histories and cultures of Aboriginal peoples, and is based on good planning principles that apply in communities across Ontario. The Province recognizes the importance of consulting with Aboriginal communities, as appropriate, on planning matters that may affect their rights and interests. The Provincial Policy Statement focuses growth and development within settlement areas and away from significant or sensitive resources and areas which may pose a risk to public health and safety. It recognizes that the wise management of land use change may involve directing, promoting or sustaining development. Land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns.			
Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change.	- The transportation choices that should be highlighted in this paragraph are active transportation, multi-modal transportation systems and transit.	- Recommend modifying this paragraph as follows: "Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation, multi-modal transportation systems and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change."	1

The Province's natural heritage resources, water resources, including the Great Lakes, agricultural resources and the food provided by these areas, mineral resources, and cultural heritage and archaeological resources provide important environmental, economic and social benefits. The wise use and management of these resources over the long term is a key provincial interest. The Province must ensure that its resources are managed in a sustainable way to maintain biodiversity, protect essential ecological processes and public health and safety, minimize environmental and social impacts, and meet its long-term needs. It is equally important to protect the overall health and safety of the population. The Provincial Policy Statement directs development away from areas of natural and human-made hazards, where these hazards cannot be mitigated. This preventative approach supports provincial and municipal financial well-being over the long term, protects public health and safety, and minimizes cost, risk and social disruption. Taking action to conserve land and resources avoids the need for costly remedial measures to correct problems and supports economic and environmental principles. Strong communities, a clean and healthy environment and a strong economy are inextricably linked. Long-term prosperity, human and environmental health and social well-being should take precedence over short-term considerations.			
	- The PPS needs to place a stronger emphasis on the relationship between land use planning, transportation planning and public health. A guiding principle should be inserted as a new paragraph in Part IV.	- Recommended that the following paragraph be inserted into this location of Part IV of the PPS: "Land use planning, transportation planning and public health need to be integrated at all stages of the planning process. An integrated planning process that considers the relationship between these three disciplines is necessary, as together they influence the design of the built environment and enhance the quality of life for the citizens of Ontario."	1
The fundamental principles set out in the Provincial Policy Statement apply throughout Ontario. To support our collective well-being, now and in the future, all land use must be well managed.	- This paragraph should be given additional support through the addition of climate change and self-sustaining communities.	- Recommend that the paragraph be modified as follows: "The fundamental principles set out in the Provincial Policy Statement apply throughout Ontario. To support our collective well-being, now and in the future, all land use must be well managed. This includes planning for climate change impacts and aiming to create self-sustaining communities."	1

1.1.3 Settlement Areas			
1.1.3.4 Appropriate development standards should be promoted which facilitate *intensification*, *redevelopment* and compact form, while avoiding or mitigating risks to public health and safety.	- The language of this policy should be revised to expand the scope to protecting and promoting public health and safety.	- Recommend modifying the policy as follows: "Appropriate development standards should be promoted which facilitate *intensification*, *redevelopment* and compact form, while ~~avoiding or mitigating risks to~~ protecting and promoting public health and safety."	1
1.1.3.6 New development taking place in *designated growth areas* should occur adjacent to the existing built-up area and shall have a compact form, mix of uses and densities that allow for the efficient use of land, *infrastructure* and *public service facilities*.	- The broad policy objectives in support of intensification have caused implementation issues at the OMB. The PPS should include statements that recognize the importance of well-designed buildings that fit contextually within surrounding intensification areas, and that strive to achieve an appropriate transition of built form.	- Recommend that the policy be modified as follows: "New development taking place in *designated growth areas* should occur adjacent to the existing built-up area and shall have a compact form, mix of uses and densities that allow for the efficient use of land, *infrastructure* and *public service facilities*. The scale of this new development will provide an appropriate transition in scale to adjacent lower scaled built form, including heritage resources. " - Recommend that a new policy be added after the existing policy 1.1.3.6, as follows: "Planning authorities shall identify the appropriate type and scale of development in intensification and redevelopment areas, promoting well-designed buildings that define and support high quality streets and public open spaces with good site design and urban design standards that create attractive, functional and vibrant places and achieve good contextual fit with adjacent areas, particularly heritage resources."	1, 3

1.3	**EMPLOYMENT** Planning authorities shall promote economic development and competitiveness by: a) providing for an appropriate mix and range of employment (including industrial, commercial and institutional) uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; c) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities; and d) ensuring the necessary *infrastructure* is provided to support current and projected needs.	- Consideration needs to be made for how employees get to and from employment, as this decision impacts other policies within the PPS related to climate change and sense of place, among others. - Employment policies within the PPS should explicitly support the green economy. - The economic success of employment lands are dependant on its location relative to transportation, servicing, labour resources, compatible residential development and amenities that create the live-work relationship.	- Recommend that the policy be modified as follows: "Planning authorities shall promote economic development and competitiveness by: a) providing for an appropriate mix and range of employment (including industrial, commercial and institutional) uses to meet long-term needs; b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; c) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities; ~~and~~ d) ensuring the necessary *infrastructure* is provided to support current and projected needs; e) ensuring convenient, efficient and reliable pedestrian, cycling and/or public transit infrastructure to facilitate sustainable and *active transportation* to employment areas, in addition to implementing *Transportation Demand Management* measures in these areas; ~~f)~~ supporting a green economy by encouraging green business and industry; and, g) ensuring that employment lands are located in areas in suitable proximity to transportation, servicing, labour resources, compatible residential development and amenities to create and maximize live-work relationships." ~~f)~~	1
1.4	**HOUSING**			
1.4.1	To provide for an appropriate range of housing types and densities required to meet projected requirements of current and future residents of the *regional market area* identified in policy 1.4.3, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through *residential intensification* and *redevelopment* and, if necessary, lands which are *designated and available* for residential development; and b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate *residential intensification* and *redevelopment*, and land in draft approved and registered plans.	- The requirement for a 10-year supply of residential land "per planning jurisdiction" creates difficulty for municipalities reaching full build-out to protect their future employment lands.	- Recommend that this policy be modified as follows: "To provide for an appropriate range of housing types and densities required to meet projected requirements of current and future residents of the *regional market area* identified in policy 1.4.3, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through *residential intensification* and *redevelopment* and, if necessary, lands which are *designated and available* for residential development; ~~and~~ b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate *residential intensification* and *redevelopment*, and land in draft approved and registered plans; and, c) ensure the supply of residential lands for draft approved and registered plans is balanced to maintain an adequate supply of employment lands for municipalities reaching full build-out."	1

1.4.3	Planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the *regional market area* by: a) establishing and implementing minimum targets for the provision of housing which is *affordable* to *low and moderate income households*. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities; b) permitting and facilitating: 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and 2. all forms of *residential intensification* and *redevelopment* in accordance with policy 1.1.3.3; c) directing the development of new housing towards locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation* and transit in areas where it exists or is to be developed; and e) establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.	- Additional clarification is required in clause (c) to ensure that these locations are adequately separated from major sources of pollution.	- Recommend that the policy be modified as follows: "Planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the *regional market area* by:" a) establishing and implementing minimum targets for the provision of housing which is *affordable* to *low and moderate income households*. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities; b) permitting and facilitating: 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and 2. all forms of *residential intensification* and *redevelopment* in accordance with policy 1.1.3.3; c) directing the development of new housing towards locations that are adequately separated from major sources of pollution and where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation* and transit in areas where it exists or is to be developed; and, e) establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety."	1
1.6.6	**Transportation Systems**	- Context sensitive solutions are important when designing and constructing transportation systems. It is important that the PPS recognize and reinforce this practice.	- Recommended that a new policy be added, as follows: "That infrastructure design and construction be sensitive to the features and functions of the greenlands system, and include context sensitive design and innovative technologies to minimize impacts and enhance the system. Infrastructure within the system should avoid key natural heritage features and key hydrologic features where possible and shall be subject to the policies of applicable Provincial plans."	1
1.6.6.5	Transportation and land use considerations shall be integrated at all stages of the planning process.	- The PPS needs to place a stronger emphasis on the relationship between land use planning, transportation planning and public health.	- Recommend that the policy be modified as follows: "Transportation, ~~and~~ land use and public health considerations shall be integrated at all stages of the planning process."	1

1.6.7 **Transportation and Infrastructure Corridors**	- Man-made and natural barriers such as 400 series highways and rail corridors function as critical barriers to creating complete communities that support connectivity, and the use of transit and active transportation. The PPS should be amended to require communities to plan for, protect, and construct mid-concession crossings of man-made and natural barriers to provide for connections between communities and motivate active transportation and transit, wherever feasible. - The Province could provide additional supportive material on what context sensitive crossings solutions are available, with examples of these crossings.	- Recommend adding a new policy to this section, as follows: "To ensure access between communities and motivate active transportation and transit, planning authorities shall plan for, protect, and construct continuous collector road networks and mid-concession crossings of man-made and natural barriers in both north-south and east-west directions, in accordance with context sensitive design best practices." - Recommend that supplementary information be provided on what context sensitive solutions could be used for these types of crossings.	1, 4
1.8 **ENERGY CONSERVATION, AIR QUALITY AND CLIMATE CHANGE**	- An additional policy is required to highlight the link between land use planning and the health impacts from air pollutants. This should be done in a similar manner to Policy 2.2.1 on Water. A new definition for 'airshed' should be created to support this new policy.	- Recommend the addition of a new policy, as follows: "Planning authorities shall protect, improve or restore air quality by using the *airshed* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development." - Recommend the addition of a new definition for 'airshed' (below).	1, 4
2.0 **WISE USE AND MANAGEMENT OF RESOURCES** Ontario's long-term prosperity, environmental health, and social well-being depend on maintaining biodiversity, protecting the health of the Great Lakes, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. Accordingly:	- This preamble should include Lake Simcoe as a key resource. - This preamble could reference the Great Lakes watershed, which includes Lake Simcoe.	- Recommend the addition of Lake Simcoe, as follows: "Ontario's long-term prosperity, environmental health, and social well-being depend on maintaining biodiversity, protecting the health of the Great Lakes and Lake Simcoe, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. " - Or, recommend the addition of the Great Lakes Watershed, as follows: "Ontario's long-term prosperity, environmental health, and social well-being depend on maintaining biodiversity, protecting the health of the Great Lakes and the Great Lakes Watershed, and protecting natural heritage, water, agricultural, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits. "	1

6.0 DEFINITIONS			
	- A definition for 'airshed' is required to clarify the policies regarding air quality, in a similar way that 'watershed' is used for water policies. - This is a complex term, and its definition will have significant implications for how municipalities implement related policies. Municipalities would like this definition to be part of a future review/ discussion, prior to the release of the final PPS. - This definition may be too complex to have a single application across the Province. The PPS definition should provide clear direction on this term, including parameters for a further municipal-level definition.	- Recommend that a new definition be added, based on the definition provided by the Ministry of the Environment in their Annual Air Quality Report 2010, as follows: "A geographical region of influence or spatial extent of the air pollution burden."	1
	- A definition for 'conversion' would aid in the implementation of policies related to employment lands.	- Recommend the addition of a definition for "conversion".	1, 3
Employment area: means those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities.	- The current definition is too broad. It should limit the uses within employment areas to industrial and related office activity, with further limits on ancillary uses and retail. - The uses that are permitted in employment areas needs to be explicitly listed.	- Recommend that the definition be modified to refine the business and economic activities permitted in there areas. This should be focused on industrial and related office activity, with further limits on ancillary uses and retail. - Recommend that all other business and economic activities allowed in employment areas be explicitly added to the definition's list.	1
	- A definition for 'non-employment use' would aid in the implementation of policies related to employment lands.	- Recommend the addition of a definition for "non-employment use".	1, 3