

Appendix A: City of Ottawa’s Analysis of the Proposed Provincial Planning Statement (2024)

Row no.	2024 Proposed PPS Portion of the PPS ERO – 019-8462 <i>Italicized = defined term in the proposed PPS</i>	Staff analysis and Recommendations to the Province, Staff analysis and Recommendations to the Province Bold = language proposed to be added
1	Chapter 1: Introduction	<u>This chapter replaces Parts I through IV of the 2020 PPS.</u>
2	How to Read this 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. This Policy Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.	<u>Staff analysis</u> This replaces Part III: How to Read the Provincial Policy Statement in the 2020 PPS. <u>Recommendations to the Province</u> The City of Ottawa recommends adding the following reference to “health”: “How to Read this Policy Statement The provincial policy-led planning system recognizes and addresses the complex interrelationships among environmental, economic, health and social factors in land use planning. This Policy Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.”
3	Vision	
4	Second through fifth paragraphs: The long-term prosperity and social well-being of Ontario depends on celebrating these differences and planning for complete communities for people of all ages, abilities and incomes. More than anything, a prosperous Ontario will see the building of more homes for all Ontarians. In addition, a prosperous Ontario will support a strong and	<u>Staff analysis</u> This replaces Part IV: Vision of Ontario’s Land Use Planning System in the 2020 PPS. The proposed Provincial Planning Statement has removed reference to healthy communities in the vision. The expanded focus on planning for complete communities for all ages, abilities and incomes, recognizing the needs of equity-deserving groups, is a positive addition. However, land use tools such as planning for complete communities that meet the needs of all, including addressing the needs of equity deserving groups, ultimately promote healthy communities that support quality of life and well-being, and the ability of people to thrive. The current references to health are only in relation to health hazards, which are just of one of many impacts of the built environment on health and well-being outcomes. Health and well-being are a pre-requisite for strong communities and a thriving economy. Lack of inclusion of healthy communities, and health and well-being as a cornerstone in the vision for how Ontario grows, limits our collective ability to ensure growth takes population health and well-being into account.

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	<p>competitive economy, and a clean and healthy environment.</p> <p>Ontario will increase the supply and mix of housing options and address the full range of housing affordability needs. Every community will build homes that respond to changing market needs, and local needs and demand. Providing a sufficient supply with the necessary range and mix of <i>housing options</i> will support a diverse and growing population and workforce, now, and for many years to come. A successful Ontario will also be one with a competitive advantage of being investment-ready and celebrated for its influence, innovation and cultural diversity. The Ontario economy will continue to mature into a centre of industry and commerce of global significance. Central to this success will be the people who live and work in this Province.</p> <p>Ontario’s land use planning framework, and the decisions that are made, shape how our communities grow and prosper.</p>	<p>Recommendations to the Province Integrating the concept of health and well-being into the vision will strengthen policy, and reinforce health, inclusive and climate resilient policies of the City of Ottawa’s new Official Plan.</p> <p>The City of Ottawa recommends the following adjustments: “The long-term prosperity and social well-being of Ontario depends on celebrating these differences and planning for healthy complete communities for people of all ages, abilities and incomes. [...]”</p> <p>Municipalities will work with the Province to design healthy and resilient communities with increased access to housing, employment, schools, transportation options, recreation and public spaces, and services that are equitable and sustainable for all Ontarians.”</p>

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	While progress has been made, equity-deserving groups still face a complex range of challenges. Municipalities will work with the Province to design complete communities with increased access to housing, employment, schools, transportation options, recreation and public spaces, and services that are equitable and sustainable for all Ontarians.	
4	<p>Eighth paragraph: The wise use and management of resources will be encouraged including natural areas, agricultural lands and the Great Lakes while providing attention to appropriate housing supply and public health and safety. Potential risks to public health or safety or of property damage from natural hazards and human-made hazards, including the risks associated with the impacts of climate change will be mitigated. This will require the Province, planning authorities, and conservation authorities to work together.</p>	<p>Staff analysis The Vision of the current 2020 PPS places much greater emphasis on planning for sustainability over the long-term; this short paragraph replaces two paragraphs which had separately addressed resource conservation and natural hazards. The current 2020 PPS asserts that “The wise use and management of these resources [natural heritage resources, water resources, including the Great Lakes, agricultural resources, mineral resources, and cultural heritage and <i>archaeological resources</i>] over the long term is a key provincial interest. The Province must ensure that its resources are managed in a sustainable way to conserve biodiversity, protect essential ecological processes and public health and safety, provide for the production of food and fibre, minimize environmental and social impacts, provide for recreational opportunities (e.g. fishing, hunting and hiking) and meet its long-term needs [...] The Provincial Policy Statement directs <i>development</i> away from areas of natural and human-made hazards. 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.”</p> <p>There are significant changes in the language: instead of being mandated to ensure that resources are managed wisely as a key provincial interest, the Province is now only providing encouragement. Similarly, risks from natural hazards will be mitigated rather than avoided. This is concerning, especially given the yet unknown changes being made to the natural heritage policies, which are expected to introduce the concept of compensation as a way to mitigate impacts. The priority has shifted from sustainable growth to maximizing housing supply, without consideration for the long term cost.</p> <p>Recommendations to the Province The City of Ottawa supports minimizing risks to health and safety through avoidance rather than mitigation. The City recommends that the Province retain strong protections for natural heritage features and other resources, and to continue directing <i>development</i> away from natural hazards. The City would also recommend that the following is added: “Municipalities and the Province shall plan for a balance of interests, with the goal of making Ontario more liveable and healthier.”</p>

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5	Chapter 2: Building Homes, Sustaining Strong and Competitive Communities	<p>Staff analysis This chapter replaces 1.0 - Building Strong Healthy Communities in the 2020 PPS. Removal of the concept of “health” from the title of Chapter 2 and in the supporting policy narrative disconnects the importance of health and well-being in developing a strong and competitive community with sufficient homes. Sufficient and affordable housing has direct impacts on health outcomes. A healthy population provides the engine for economic growth and competitive communities, as evidenced during the Covid-19 pandemic.</p> <p>Removing recognition of health as a key determinant for a <i>complete community</i> reduces capacities of planning decisions to consider health and well-being in the deliberation of planning policies and decisions; this is despite the built environment being a significant driver of health outcomes. This also contradicts directives to Ontario Boards of Health, through the Ontario Public Health Standards Requirements for Programs, Services and Accountability, which states “To reduce exposure to health hazards and promote the development of healthy built and natural environments that support health [...]”.</p> <p>Ottawa’s Official Plan deeply embeds health and well-being, in the strategic directions as well as through many policy implementation links throughout.</p> <p>Recommendations to the Province The City of Ottawa recommends that the Province re-integrate health in the title of Chapter 2 and policy directions of Chapter 2.1 to ensure health-promoting planning policies at the municipal level are supported by Provincial policies.</p>
6	2.1 – Planning for People and Homes	This section replaces 1.1 – Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns in the 2020 PPS
7	<p>1. As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ministry of Finance 25-year projections and may modify projections, as appropriate.</p> <p>2. Notwithstanding policy 2.1.1, municipalities may continue to</p>	<p>Staff analysis This series of policies replaces the sub-policies of 1.1.1 in the 2020 PPS. The current 2020 PPS directs municipalities to designate enough land for a maximum of 25 years, whereas the proposed policies require lands be designated for a minimum of 20 years and a maximum of 30 years. <i>Infrastructure, employment areas and strategic growth areas</i> are expressly allowed to extend beyond this horizon.</p> <p>The City of Ottawa’s Official Plan designates lands to 2046 and thereby meets a 25-year target. The Official Plan projections were also based on the Ministry of Finance forecasts at the time; however the Ministry of Finance forecasts for the same planning horizon are updated annually, whereas it would be impractical and unnecessary for municipalities to do the same. The next Official Plan update may project and plan for a time horizon beyond a 25-year period. A timeframe longer than 25-years will better align with infrastructure planning that typically has a longer outlook. However, the accuracy of growth projections diminish with longer time horizons so an analysis will be required to establish an appropriate planning range.</p>

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	<p>forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.</p> <p>3. At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.</p> <p>Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related</p>	<p>The timing of zoning orders from the Minister of Municipal Affairs and Housing are to be incorporated into the next official plan update and related infrastructure plans; however, this proposed phasing of zoning orders may not be feasible if the zoning order allows for building permit issuance prior to the incorporation of the next update and the existing <i>infrastructure</i> cannot accommodate the proposed <i>development</i>, or if the proposed <i>development</i> supplants existing <i>development</i> that relies on existing capacity in the system.</p> <p><u>Recommendations to the Province</u> The City of Ottawa supports increasing the maximum designated supply of land beyond the current 25-year maximum to better integrate <i>infrastructure</i> and land use planning. Policy 1 in section 2.1 should state that planning authorities that base population and employment growth forecasts on Ministry of Finance 25-year projections are not required to update them until the next Official Plan review. An interpretation to update the projections more frequently are unnecessary due to the minimum land supply requirements and impractical.</p> <p>The PPS should require Minister's Zoning Orders to be cognizant of existing <i>infrastructure</i> limitations and have no effect until sufficient capacity and infrastructure are available.</p>

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	infrastructure plans.	
8	<p>4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:</p> <p>a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and</p> <p>b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.</p> <p>5. Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.4 shall be based on and reflect the allocation</p>	<p>Staff analysis</p> <p>The proposed policy replaces 1.4.1 a) and b) in the 2020 PPS. The proposed language weakens the Province’s stance on healthy and liveable communities. The policies of the current PPS focus on health, liveability, and safety as key elements of communities and that efficient land use patterns have a role to play in sustaining these communities. The current policies also provide for the foundation of the City’s Official Plan’s focus on healthy and inclusive communities. Although the proposed changes do not directly impact City policy, should the City be taken to the tribunal on a matter where health and wellness are prioritized, the City’s stance will be weakened.</p> <p>The proposed policies introduce the ideal to “improve social equity for [...] equity-deserving groups” but does not define social equity or equity-deserving group.</p> <p>Recommendations to the Province</p> <p>The City of Ottawa is generally supportive of this policy and the focus on creating <i>complete communities</i>, particularly the introduction of sub-policy (c). However, the ultimate objective for communities is that they are healthy, liveable, resilient, and safe for all; the <i>complete community</i> planning principle is a great tool to achieve this goal but is not a desired outcome in of itself. Therefore, the City recommends that the Province adjust the definition of <i>complete communities</i> in Chapter 7 to read as “means healthy and resilient places such as mixed-use [...]”.</p> <p>References to health are an appropriate consideration when evaluating <i>development</i> applications, due to the links between land use planning and healthy communities.</p> <p>References to affordable housing are proposed to be removed from this chapter. The City recommends that sub-policy (a) read as “[...] <i>housing options that include a range of affordability</i>, [...]”.</p> <p>The City recommends the Province adjust sub-policy (c) to also refer to “economic and social equity” and introduce a definition in Chapter 7 for both “social equity” and “economic equity”. Without a definition these concepts are difficult to implement in municipal official plans, and it is important to have a shared definition between planning authorities.</p>

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	of population and units by the upper-tier municipality.	
9	2.2 Housing	This section replaces 1.4 in the 2020 PPS.
10	<p>1. Planning authorities shall provide for an appropriate range and mix of <i>housing options</i> and densities to meet projected needs of current and future residents of the <i>regional market area</i> by:</p> <p>a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income <i>households</i>, and coordinating land use planning and planning for housing with Service Managers to address the full range of <i>housing options</i> including <i>affordable housing</i> needs;</p> <p>b) permitting and facilitating:</p> <ol style="list-style-type: none"> 1. all <i>housing options</i> required to meet the social, health, economic and well-being requirements of current and future residents, including <i>additional needs housing</i> and needs arising from demographic changes and employment opportunities; and 	<p>Staff analysis This policy replaces 1.4.3 from the 2023 PPS. Proposed policy 2.2.1 a) requires Service Managers to coordinate land use planning to address the full range of <i>housing options</i>, including housing affordability needs.</p> <p>Based on feedback following the 2023 draft, the Province has largely reinstated the language from the 2020 PPS, which is supported by staff.</p> <p>Recommendations to the Province The City of Ottawa agrees with establishing minimum targets of housing that is affordable to low- and moderate-income households.</p>

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	<p>2. all types of residential <i>intensification</i>, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new <i>housing options</i> within previously developed areas, and <i>redevelopment</i> which results in a net increase in residential units in accordance with policy 2.3.3;</p> <p>c) promoting densities for new housing which efficiently use land, resources, <i>infrastructure</i> and <i>public service facilities</i>, and support the use of <i>active transportation</i>; and</p> <p>d) requiring <i>transit-supportive</i> development and prioritizing <i>intensification</i>, including potential air rights development, in proximity to transit, including corridors and stations.</p>	
11	2.3 Settlement Areas and Settlement Area Boundary Expansions	

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	2.3.1 General Policies for Settlement Areas	
12	1. <i>Settlement areas</i> shall be the focus of growth and development. Within <i>settlement areas</i> , growth should be focused in, where applicable, <i>strategic growth areas</i> , including <i>major transit station areas</i> .	<p>Staff analysis This policy replaces 1.1.3.1 in the 2020 PPS. Proposed policy 2.3.1 encourages growth to be focused in <i>strategic growth areas</i> within a <i>settlement area</i>, whereas the current 2020 PPS directs that <i>settlement areas</i> in their entirety shall be the focus of growth. <i>Strategic growth areas</i> is a concept from the Growth Plan for the Greater Golden Horseshoe and the definition carries over from the growth plan into the proposed PPS.</p> <p>Applying the proposed definition to the City’s Official Plan, <i>Strategic growth areas</i> corresponds to the Protected <i>Major Transit Station Area</i>, Hub, Corridor, Neighbourhood, and Village designations.</p> <p>Recommendations to the Province N/A</p>
13	2. Land use patterns within <i>settlement areas</i> should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned <i>infrastructure</i> and <i>public service facilities</i> ; c) support <i>active transportation</i> ; d) are <i>transit-supportive</i> , as appropriate; and e) are <i>freight-supportive</i> .	<p>Staff analysis This policy replaces 1.1.3.2 of the current 2020 PPS. The proposed policy is weaker than the existing policy through the replacement “shall” with “should”. Notably, sub-policies relating to <i>active transportation</i>, air quality, energy efficiency, and climate change have been removed.</p> <p>Recommendations to the Province As modelled in Ottawa’s Energy Evolution action plan to meet greenhouse gas (GHG) emission reductions, land use patterns play a role in increasing environment and energy resilience and should be reflected in this PPS policy.</p> <p>Sub-policy e), <i>freight-supportive</i> is recommended to have the same condition of “as appropriate” as proposed in sub-policy d), as not all parts of settlement areas will have a direct relationship to being freight-supportive.</p>
14	3. Planning authorities shall support general <i>intensification</i> and <i>redevelopment</i> to support the achievement of <i>complete communities</i> , including by planning for a range and mix of	<p>Staff analysis This policy replaces 1.1.3.3 of the current 2020 PPS.</p>

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	<i>housing options</i> and prioritizing planning and investment in the necessary <i>infrastructure</i> and <i>public service facilities</i> .	
15	4. Planning authorities are encouraged to establish and implement minimum targets for <i>intensification</i> and <i>redevelopment</i> within built-up areas, based on local conditions.	Staff analysis This policy replaces policy 1.1.3.5 in the 2020 PPS.
16	5. Planning authorities are encouraged to establish density targets for <i>designated growth areas</i> , based on local conditions. <i>Large and fast-growing municipalities</i> are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.	Staff analysis This policy replaces policy 1.1.3.6 in the 2020 PPS. A target of 50 residents and jobs per gross hectare has been added within <i>designated growth areas</i> . Ottawa’s Official Plan minimum density meets this target.
17	6. Planning authorities should establish and implement phasing policies, where appropriate, to ensure that development within <i>designated growth areas</i> is orderly and aligns with the timely provision of the <i>infrastructure</i> and public service facilities.	Staff analysis This policy replaces policy 1.1.3.7 in the 2020 PPS.
18	2.3.2 New Settlement Areas and Settlement Area Boundary Expansions	<u>This section is new in the 2024 PPS.</u>
19	1. In identifying a new <i>settlement area</i> or allowing a <i>settlement area</i>	Staff analysis

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	<p>boundary expansion, planning authorities should consider the following:</p> <ul style="list-style-type: none"> a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses; b) if there is sufficient capacity in existing or planned <i>infrastructure</i> and <i>public service facilities</i>; c) whether the applicable lands comprise <i>specialty crop areas</i>; d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas; e) whether the new or expanded <i>settlement area</i> complies with the <i>minimum distance separation formulae</i>; f) whether impacts on the <i>agricultural system</i> are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an <i>agricultural impact assessment</i> 	<p>This policy replaces 1.1.3.8 of the current 2020 PPS. The proposed policy removes the requirement of a municipal comprehensive review (MCR) to expand the City’s urban and village boundaries, (i.e., <i>settlement areas</i>). Under the proposed policies, a <i>settlement area</i> boundary may be expanded, or a new <i>settlement area</i> may be created, through an application for an Official Plan Amendment by a private-landowner or the municipality at any given time.</p> <p>The strength of the municipal comprehensive review is the relative comparison of candidate expansion areas to select the lands that best fit the framework identified in the PPS, including the proposed 2024 PPS. This detailed analysis ensures efficient development patterns, protects resources, ensures effective use of <i>infrastructure</i> and <i>public service facilities</i> and minimizes unnecessary public expenditures. Allowing expansion of <i>settlement areas</i> through a piecemeal approach takes away a critical tool in assessing the viability of the lands to be added to the <i>settlement areas</i>.</p> <p>Combined with Bill 185’s proposed change to the <i>Planning Act</i> to allow appeals for refusal or lack of decision relating to private Official Plan Amendment applications for settlement area expansions, appeals for such applications will create uncertainty in eligible lands that are included in implementing transportation master plans and infrastructure master plans, along with the related projects that are eligible for development charges. The requirement for supporting infrastructure is further explored in comments on policy 2 to section 2.3.2.</p> <p>The proposed sub-policy criteria a) through e) are similar to the current 1.1.3.8 sub-policy criteria a) through d); however, the weight of the proposed criteria is reduced to a “shall consider”.</p> <p>Proposed sub-policy f) expands on the current 1.1.3.8 sub-policy e) by requiring an <i>agricultural impact assessment</i> where avoidance on the <i>agricultural system</i> is not possible based on provincial guidance; however, such guidance has been provided for concurrent review to determine the full impact of this policy. There may be additional resource costs to the City for a review of these assessments. \</p> <p><u>Recommendations to the Province</u></p> <p>The City of Ottawa supports the current PPS requirement for a municipal comprehensive review when evaluating <i>settlement area</i> boundary expansions. While we recognize that it may be necessary to expand <i>settlement areas</i> to accommodate growth, doing so within a municipal comprehensive review of an official plan is the most efficient methodology because it takes a holistic approach to identify the best areas to accommodate future growth and considers the long-term cost of expansion in terms of <i>infrastructure</i>, <i>public service facilities</i>, protection of resources and public health and the environment. Taking a coordinated approach to land uses and <i>infrastructure</i> further reduces servicing and transportation costs.</p> <p>In addition, the City recommends also retaining the current PPS policy 1.1.3.9 to allow settlement area adjustments outside of a municipal comprehensive review that results in no net increase to settlement area lands.</p>

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	or equivalent analysis, based on provincial guidance; and g) the new or expanded <i>settlement area</i> provides for the phased progression of urban development.	
20	2. Notwithstanding 2.3.2.1.b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available.	<p>Staff analysis This is a new policy for new settlement areas, such as a new urban community or Village in Ottawa, and elevates the infrastructure and public service facilities criterion of 2.3.2.1.b) from “shall be considered” to “being demonstrated”. If infrastructure and public service facilities are not available, then an update to the infrastructure and transportation master plans is required to be adopted concurrently with an Official Plan amendment that identifies the new settlement area. However, it is not clear how public service facilities outside of the municipal jurisdiction, such as hospitals and school boards, can reasonably be demonstrated as being planned at the time that a new settlement area is identified.</p> <p>Identifying a new settlement area is not necessarily the same as designating a new settlement area. The City of Ottawa supports demonstrating planned or available infrastructure when new settlement areas a designated; however, identifying but not designating a new settlement area can initiate an update to the infrastructure and transportation master plans so that when the master plans for the related infrastructure is complete, a new settlement area can then be designated.</p> <p>Recommendation to the Province The City of Ottawa supports the creation of new settlement areas only through a municipal comprehensive review so that the best lands are selected from a suite of options.</p> <p>Replace “identify” with “designate”, such as “Notwithstanding 2.3.2.1.b), planning authorities may identify designate a new settlement area....” so that infrastructure and transportation master plan updates can commence through the identification of a new settlement area rather than concurrent with an Official Plan amendment or municipal comprehensive review.</p>
21	2.4 Strategic Growth Areas	This is a new policy section in the 2024 PPS.
22	2.4.1 General Policies for Strategic Growth Areas	This is a new policy section in the 2024 PPS.
23	1. Planning authorities are encouraged to identify and focus	Staff analysis

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	<p>growth and development in <i>strategic growth areas</i>.</p> <p>2. To support the achievement of <i>complete communities</i>, a range and mix of <i>housing options</i>, <i>intensification</i> and more mixed-use development, strategic growth areas should be planned</p> <ul style="list-style-type: none"> a) to accommodate significant population and employment growth; b) as focal areas for education, commercial, recreational, and cultural uses; c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and d) to support <i>affordable</i>, accessible, and equitable housing <p>3. Planning Authorities should:</p> <ul style="list-style-type: none"> a) prioritize planning and investment for <i>infrastructure</i> and <i>public service facilities</i> in <i>strategic growth areas</i>; b) identify the appropriate type and scale of development in <i>strategic growth areas</i> and 	<p>This is a new series of policies in the 2024 PPS. <i>Strategic growth areas</i> is a concept from the Growth Plan for the Greater Golden Horseshoe; however, jurisdictions outside of the Greater Golden Horseshoe will not be familiar with the concept. <i>Strategic growth areas</i> are defined and represent areas identified by a municipality to be the focus for accommodating <i>intensification</i> and a more <i>compact built form</i>. In Ottawa, <i>strategic growth areas</i> corresponds to Protected <i>Major Transit Station Area</i>, Hub, Corridor, Neighbourhood, and Village designations.</p> <p>A new policy 3 notably directs the prioritization of infrastructure to these areas and to identify appropriate development scale and transition to adjacent areas.</p> <p><u>Recommendations to the Province</u> The City of Ottawa supports adding the concept of strategic growth areas to the PPS.</p>

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	<p>the transition of built form to adjacent areas;</p> <p>c) permit development and intensification in strategic growth areas to support the achievement of <i>complete communities</i> and a <i>compact built form</i>;</p> <p>d) consider a student housing strategy when planning for <i>strategic growth areas</i>; and</p> <p>e) support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential.</p>	
24	2.4.2 Major Transit Station Areas	This is a new policy section in the 2024 PPS.
25	1. Planning authorities shall delineate the boundaries of <i>major transit station areas</i> on <i>higher order transit corridors</i> through a new official plan or official plan amendment adopted under section 26 of the <i>Planning Act</i> . The delineation shall define an area within an approximately 500 to 800 metre radius of a transit station and that maximizes the number of	<p>Staff analysis</p> <p>This is a new policy. Ottawa has been identified as a <i>large and fast-growing municipality</i>, which prescribes additional requirements around density targets for <i>major transit station areas</i>. The City’s Official Plan designates 25 <i>major transit station areas</i> around most of, but not all, its O-Train stations. These are the areas that the City has identified for the most density and variety of uses, intended to be nodes of residential and commercial activity.</p> <p>The City may consider an amendment to the Official Plan to re-name “Protected <i>Major Transit Station Areas</i>” simply to <i>Major Transit Station Areas</i>.</p> <p>The 2024 PPS now proposes flexibility for the delineation of major transit station areas through the addition of the word “approximately” before “500 to 800-metre radius of a transit station” and addresses the City’s previous comments on the 2023 draft.</p>

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	potential transit users that are within walking distance of the station.	
26	<p>2. Within <i>major transit station areas on higher order transit corridors</i>, planning authorities shall plan for a minimum density target of:</p> <ul style="list-style-type: none"> a) 200 residents and jobs combined per hectare for those that are served by subways; b) 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or c) 150 residents and jobs combined per hectare for those that are served by commuter or regional inter-city rail. <p>3. Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by:</p> <ul style="list-style-type: none"> a) planning for land uses and built form that supports the achievement of minimum density targets; and b) supporting the redevelopment of surface 	<p>Staff analysis</p> <p>This is a new policy in the 2024 PPS. The proposed density targets were taken from the Growth Plan for the Greater Golden Horseshoe and are specific to municipalities within this area, however the province proposes to apply these density targets across the province. The City of Ottawa would only be subject to the prescribed minimum target of 160 residents and jobs combined per hectare (RJH) in sub-policy b) due to the nature of our city’s transit system.</p> <p>The Official Plan designates 25 <i>MTSAs</i>, five of which would fall below the proposed provincial minimum. These five <i>MTSAs</i> are: Orléans Town Centre (120 RJH), Barrhaven Town Centre (120 RJH), Kanata Town Centre (120 RJH), Riverside South Town Centre (100 RJH), and Tallwood + Knoxdale (120 RJH).</p> <p>Proposed policy 2.4.2.4 allows for a municipality to submit an Official Plan Amendment to the Minister to approve density targets for <i>MTSAs</i> that are lower than the minimum target. However, the City of Ottawa, as a single-tier municipality, does not submit an Official Plan Amendment to the Province for approval. Only the new Official Plan is submitted to the Province for approval and this was done in 2022. It is unclear how the City will receive permission from the Province to have density targets that are lower than the prescribed minimums.</p> <p>Recommendations to the Province</p> <p>The City of Ottawa has a number of BRT and LRT stations that are not designated as <i>MTSAs</i>, and the City seeks clarity if new <i>MTSAs</i> are required to be designated around these stations. The City would not be supportive of designating every <i>higher order transit</i> station as an <i>MTSA</i>. Some stations are located adjacent to designated <i>employment areas</i>. Requiring that these be <i>MTSAs</i> will remove a significant portion of lands that are currently dedicated for high-impact employment uses.</p> <p>The City also has five approved <i>MTSAs</i> that are below the minimum densities outlined in policy 2.4.2.2. The City assigned their respective density targets due to feedback from the industry on the feasible economics surrounding these <i>higher order transit</i> stations located in newly developing areas, and the existing built form.</p> <p>The City would like clarity if the Province will require municipalities to increase the density targets of already approved <i>MTSAs</i> that don’t meet the minimum 160 residents and jobs per hectare, and how the Province will approve an Official Plan Amendment for single-tier municipalities, or the OLT with respect to policy 2.4.2.</p>

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	<p>parking lots within major transit station areas, including commuter parking lots, to be transit supportive and promote complete communities.</p> <p>4. For any particular <i>major transit station area</i>, planning authorities may request the Minister to approve an official plan or official plan amendment with a target that is lower than the applicable target established in policy 2.4.2.2, where it has been demonstrated that this target cannot be achieved because:</p> <ul style="list-style-type: none"> a) <i>development</i> is prohibited by provincial policy or severely restricted on a significant portion of the lands within the delineated area; or b) there are a limited number of residents and jobs associated with the built form, but a <i>major trip generator</i> or feeder service will sustain high ridership at the station or stop. <p>5. Planning authorities may plan for <i>major transit station areas</i> that are not on <i>higher order transit corridors</i> by delineating</p>	

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	boundaries and establishing minimum density targets.	
27	6. All <i>major transit station areas</i> should be planned and designed to be <i>transit-supportive</i> and to achieve <i>multimodal</i> access to stations and connections to nearby <i>major trip generators</i> by providing, where feasible: <ul style="list-style-type: none"> a) connections to local and regional transit services to support <i>transit service integration</i>; b) <i>infrastructure</i> that accommodates a range of mobility needs and supports <i>active transportation</i>, including sidewalks, bicycle lanes, and secure bicycle parking; and c) commuter pick-up/drop-off areas. 	<p>Staff analysis This policy was taken from the Growth Plan for the Greater Golden Horseshoe and would be a new policy to Ottawa. There will be nominal impact on City policies, however, the language is weakened compared to what is in the current Growth Plan and the City would prefer that the Province take a stronger stance on requiring <i>multimodal</i> access within <i>major transit station areas</i>.</p> <p>Recommendations to the Province The City of Ottawa supports the integration of this policy into the proposed PPS but recommends that proposed policy 2.4.2.6 retain the existing “will” condition from policy 2.2.4.8 of the Growth Plan “All <i>major transit station areas</i> will be planned and designed to be <i>transit-supportive</i> and to achieve <i>multimodal</i> access to stations and connections to nearby <i>major trip generators</i> by providing, where feasible:”.</p> <p>Municipalities are required to designate <i>MTSAs</i> in the area immediately around <i>higher order transit</i> stations. It is in the municipality and the Province’s best interest to require that these areas prioritize <i>multimodal</i> access and are designed in ways that support transit, as to reflect the significant investment that has gone into financing the stations. <i>Transit-supportive</i> designs and <i>active transportation</i> near transit are crucial to reduce GHG emissions.</p> <p>The City recommends that the reference to “bicycle lanes” in sub-policy (b) be replaced with “cycling facilities” to provide for more flexibility on the types of cycling amenities that can be provided. Bicycle lanes are a subset of cycling facilities and are not usually physically separated from the road. This change is necessary to ensure flexibility in how this policy is implemented, which will ultimately improve safety for cyclists.</p>
28	2.8 Employment	
29	2.8.1 Supporting a Modern Economy	
30	2. Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to <i>sensitive land uses</i> without <i>adverse effects</i> are encouraged in <i>strategic growth areas</i> and other	<p>Staff analysis This proposed policy is new and encourages the location of certain industrial uses within <i>strategic growth areas</i>, which are also the City’s designations that permit the most residential density. The City’s Hubs and Corridors already permit similar uses provided certain conditions, including scale and compatibility, are met, but this policy provides the City with the opportunity to revisit what uses are permitted and expand on them. Small-scale warehousing permissions will provide opportunities to reduce transportation costs associated with e-commerce and the last-kilometre delivery.</p>

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	mixed-use areas where <i>frequent transit service</i> is available, outside of <i>employment areas</i> .	<p>Recommendations to the Province</p> <p>In addition to not having any <i>adverse effects</i>, including health risks, industrial and manufacturing uses within <i>strategic growth areas</i> should also be “small-scale”. The City of Ottawa recommends that the policy be re-worded to “Small-scale industrial, manufacturing and warehousing uses [...]”.</p> <p>The City of Ottawa supports permitting small-scale industrial, manufacturing, and warehousing adjacent to sensitive land uses without adverse effects; however, encouraging such uses within strategic growth areas where frequent transit service is available may have implications for planning authorities when considering other land uses that may better utilize the transit system while still supporting a modern economy and complete communities. The City recommends replacing “encouraged” with “permitted”.</p>
31	3. On lands for employment outside of <i>employment areas</i> , including on lands that provide for an appropriate transition of uses to prevent <i>adverse effects</i> , a diverse mix of land uses, including residential, employment, <i>public service facilities</i> and other institutional uses shall be permitted, in accordance with policy 3.5, to support the achievement of <i>complete communities</i> .	<p>Staff analysis</p> <p>This is a new policy in the 2024 PPS. The City of Ottawa recognizes the importance for many municipalities to co-locate residential uses with commercial services to create more mixed-use communities.</p> <p>However, if the province’s goal is to allow for a diversity of uses, certain areas outside of employment areas must be protected for non-residential uses that cannot compete with residential land values to ensure there is a place for them as part of <i>complete communities</i>. Otherwise these areas will be dominated by residential uses.</p> <p>The proposed addition of a residential use within lands intended as an appropriate transition is counter to the goal of providing a transition area and could also sterilize adjacent vacant land from developing as industrial or other uses that generate off-site impacts to adjacent sensitive uses but have limited alternative locations.</p> <p>The desire to create additional permissions for housing will have unintended consequences on existing and future businesses in former employment areas that are transitioning but still have significant industrial-related uses.</p> <p>Recommendations to the Province</p> <p>The City of Ottawa recommends that policy 2.8.1.3 be re-worded to “On lands for employment outside of <i>employment areas</i> and taking into account the transition of uses to prevent <i>adverse effects</i>, a diversity of uses may be permitted to support the achievement of a healthy local economy”. This will enable municipalities to consider the range of permissions that are appropriate for their context. Permitting residential and other sensitive uses within a transition area defeats the purpose of a transition area.</p>
32	2.8.2 Employment Areas	This section replaces 1.3.2 in the 2020 PPS.

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33	<p>3. Planning authorities shall designate, protect and plan for all <i>employment areas</i> in <i>settlement areas</i> by:</p> <ul style="list-style-type: none"> a) planning for <i>employment area</i> uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities; b) prohibiting residential uses, commercial uses, <i>public service facilities</i> and other <i>institutional uses</i>; c) prohibiting retail and office uses that are not associated with the primary employment use; d) prohibiting other <i>sensitive land uses</i> that are not ancillary to the primary employment use; and e) including an appropriate transition to adjacent non-<i>employment areas</i> to ensure land use compatibility. 	<p>Staff analysis This policy replaces 1.3.2.1 in the 2020 PPS. The proposed language will explicitly prohibit office and retail uses from lands designated as <i>employment areas</i>, unless they are associated with the primary use, as well as <i>institutional uses</i> such as child-care or places of worship.</p> <p>The City’s Official Plan allows for major office uses not affiliated with a primary use to locate within an employment area designation to make the best use of transit investments. Residential, <i>institutional</i>, and all other <i>sensitive land uses</i> are not permitted within this designation.</p> <p>Recommendations to the Province The City of Ottawa recommends that the Province provide clarity on major office permissions in a <i>major transit station area</i> that is also an <i>employment area</i> (proposed policies 2.8.1.4 vs 2.8.2.3 c).</p> <p>2.8.2.3 c) prohibits office uses that are not associated with the primary employment use. However, 2.8.1.4 directs major office to <i>major transit station areas</i>. There are scenarios where an <i>MTSA</i> is also an <i>employment area</i>, meaning they can be “stackable” with related policies for both applying to the same lands rather than being mutually exclusive.</p> <p>The City of Ottawa recommends that 2.8.2.3 c) include an exception for office permissions that are within a <i>major transit station area</i> to achieve <i>transit supportive</i> densities that are otherwise not achievable with other industrial and manufacturing uses and make best use of transit investments.</p> <p>To maximize the use of <i>employment areas</i> for <i>employment uses</i>, 2.8.23 e) should be revised so that where feasible, the transition occurs on the non-employment side and to be consistent with policy 3.5.2. Including an appropriate transition within the built-up area is not typically feasible within built-up areas, whether the transition occurs within or outside of the employment area.</p>
34	4. Planning authorities may remove lands from <i>employment</i>	Staff analysis

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	<p><i>areas</i> only where it has been demonstrated that:</p> <ul style="list-style-type: none"> a) there is an identified need for the removal and the land is not required for <i>employment area</i> uses over the long term; b) the proposed uses would not negatively impact the overall viability of the <i>employment area</i> by: <ul style="list-style-type: none"> 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned <i>employment area</i> uses in accordance with policy 3.5; 2. maintaining access to <i>major goods movement facilities</i> and <i>corridors</i>; c) existing or planned <i>infrastructure</i> and <i>public service facilities</i> are available to accommodate the proposed uses; d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan. 	<p>This policy replaces 1.3.2.5 in the 2020 PPS. The proposed policy would allow for lands to be removed from <i>employment areas</i> without a municipal comprehensive review. The criteria to remove these lands, as outlined in proposed sub-policies (a), (b), and (c), remain the same as the criteria in the current 2020 PPS, with the exception that it may now be initiated by both the City and a private landowner at any time.</p> <p>The <i>employment area</i> concept intentionally protects the conditions that make these businesses successful, including clustering with similar uses and proximity to goods movement networks, and are otherwise unable to locate in other areas of the municipality. A comprehensive review allows municipalities to consider economic investment and protection along with residential growth to ensure adequate lands for both. This would not be fully recognized outside of a comprehensive review on a site-by-site basis and directly contradicts the intent of sub-policy (a). A comprehensive review is precisely the tool municipalities use to assess the long term impacts of removing and adding employment lands.</p> <p>Site specific conversions will impact adjacent properties and the business park overall, particularly with the proposed wording of 2.8.2.5 b) that allows for conversions where avoidance is not possible and impacts only need to be minimized but not introduced or prevented. Moreover, systemic changes that results in a net benefit to employment lands and other PPS goals overall, such as the division of employment areas into multiple categories, are beyond the scope of site-specific applications. Allowing conversions outside of a comprehensive review threatens the viability of remaining employment lands through the introduction of new and different uses that affects land values, as well as eliminates opportunity for economic growth over the long-term as new and emerging industries may seek lands that are no longer available.</p> <p>Land values in <i>employment areas</i> tend to be less than lands that permit residential uses within the same municipality. Real estate market speculation will result in a negative impact to industrial employers who require land that is large but cost effective to accommodate their land extensive employment/industrial uses.</p> <p>Policy 2.8.2.5 b) intends for proposed uses to not negatively impact the overall viability of the <i>employment area</i>, which the City supports. However, the same policy lists condition (1) that allows for impacts to be minimized, implying a negative impact still occurs, which contradicts the parent policy of no negative impacts.</p> <p><u>Recommendations to the Province</u> The City of Ottawa recommends retaining the current need for a comprehensive review to evaluate the removal of lands from <i>employment areas</i>.</p> <p>The City of Ottawa recommends 2.8.2.5 b) 1) be deleted as it contradicts the intent of 2.8.2.5 b) and that 2.8.2.5 b) 2) be renumbered accordingly as a sub-policy of 2.8.2.5. Policy 2.8.2.5 b) intends for proposed uses to not negatively impact the overall viability of the <i>employment area</i>, which the City supports. The following sub-policies should not be able to establish conditions that undermine the goal of the parent policy in every situation.</p>

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		The City of Ottawa supports the addition of sub-policy d) to the proposed 2024 PPS, as this requires planning authorities to consider the long-term needs of employment lands when considering their removal.
	2.9 Energy Conservation, Air Quality and Climate Change	This section replaces 1.8 in the 2020 PPS.
35	1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the <i>impacts of a changing climate</i> through approaches that: a) support the achievement of compact, <i>transit-supportive</i> , and <i>complete communities</i> ; b) incorporate climate change considerations in planning for and the development of <i>infrastructure</i> , including stormwater management systems, and <i>public service facilities</i> ; c) support energy conservation and efficiency; d) promote <i>green infrastructure, low impact development, and active transportation</i> , protect the environment and improve air quality; and e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community	<p>Staff analysis</p> <p>This policy replaces 1.8.1 in the current PPS. The proposed PPS removes the policy regarding maximizing vegetation in urban areas where feasible. However, due to the caveat of “where feasible” in the current 2020 PPS, the policy was difficult to implement. This policy supported the City’s efforts to increase the urban canopy cover, which has positive implications on climate, natural heritage, and human health. Trees have been relegated to providing green infrastructure and by doing so deny their use in mitigating and adapting to climate change for the purposes of providing shade on public and private property.</p> <p>The new policy regarding promotion of “<i>green infrastructure, low-impact development</i> [...] protect the environment and improve air quality” provides strong support for the urban tree and urban greenspace policies in the Official Plan. The City’s new Asset Management Plan specifically identifies the urban forest and greenspace as <i>green infrastructure</i>.</p> <p>The proposed policies emphasize the incorporation of climate change consideration into the planning and development of <i>infrastructure</i>, including stormwater management systems, promotion of <i>low-impact development (LID)</i>, and taking into consideration of approaches to build community resilience to the <i>impacts of a changing climate</i>. This policy would provide support for the Official Plan policies that require <i>infrastructure</i> to be durable, adaptive, and resilient to the current climate and future climate, including extreme weather events. The Official Plan also states that when local plans are prepared, they need to evaluate and apply mitigation measures to ensure future <i>development</i> is resilient to the <i>impacts of changing climate</i>.</p> <p>Policies pertaining to air quality have been reduced.</p> <p>Proposed sub-policy (e) could be useful to implement innovative policies to reduce GHG emissions if the reference to “take into consideration” was replaced with a more direct action, such as “incorporation of alternative” or “innovative design features”.</p> <p>Recommendations to the Province</p> <p>The City of Ottawa is concerned that these policies, which are crucial to mitigating the <i>impacts of changing climate</i> and upholding environmental and human health, are proposed to be weakened.</p>

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	resilience to the <i>impacts of a changing climate</i> .	<p>The City recommends that the Province strengthen the direction to reduce greenhouse gases, incorporate climate change considerations into the development of <i>infrastructure</i>, and preparing for the <i>impacts of a changing climate</i>. Climate change is already occurring and will only get worse. The City of Ottawa is experiencing the impacts of climate change. Notably, the Rideau Canal skating rink (a major local economic generator and culturally significant event) was unable to open due to an increasingly warming winter, impacting revenues for many restaurants, hotels, shops and other tourist attractions. To protect our economy, we must protect our residents and their businesses from climate change.</p> <p>The City recommends that the Province reinstate policies related to air quality. Negative impacts to neighbouring <i>sensitive land uses</i> should be a concern. Provincial regulations are based on 8-hour, 12-hour or 24-hour exposures. Health impacts still occur below these levels. Ontario’s ambient air quality contaminants provides concentrations of a contaminant in air that is protective against <i>adverse effects</i> on health and/or the environment. They are commonly used in environmental assessments, special studies using ambient air monitoring data, and assessment of general air quality in a community.</p> <p>The City of Ottawa recommends that the Province modifies section 2.9 as follows: “1. Planning authorities shall plan to reduce greenhouse gas emissions, improve air quality, and prepare for the <i>impacts of a changing climate</i> through approaches that: [...] c) advance sustainable design which maximizes energy efficiency and conservation; d) seek opportunities for green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; e) incorporate innovative design features that reduce greenhouse gas emissions and build community resilience to the <i>impacts of a changing climate</i>.”</p>
36	Chapter 3: Infrastructure and Facilities	This is a new chapter in the 2024 PPS.
37	3.1 General Policies for infrastructure and Public Service Facilities	This section replaces 3.1 in the 2020 PPS.
38	1. <i>Infrastructure and public service facilities</i> shall be provided in an efficient manner while accommodating projected needs.	<p>Staff analysis This policy replaces 1.6.1 in the 2020 PPS. The more permissive policies regarding expansion of <i>settlement areas</i> and rural development contradict the objective of providing <i>infrastructure</i> and <i>public service facilities</i> in an efficient and financially viable manner.</p> <p>Proposed sub-policy b) introduces new language that will encourage the use of stormwater management that is provided and paid for by private landowners at the time of <i>development</i>.</p>

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	Planning for <i>infrastructure</i> and <i>public service facilities</i> shall be coordinated and integrated with land use planning and growth management so that they: <ul style="list-style-type: none"> a) are financially viable over their life cycle, which may be demonstrated through asset management planning; b) leverage the capacity of development proponents, where appropriate; and c) are available to meet current and projected needs. 	<p>Recommendations to the Province</p> <p>To provide <i>infrastructure</i> in the most efficient manner, the City of Ottawa recommends directing growth to <i>settlement areas</i> and continuing the comprehensive review approach to evaluate the expansion of <i>settlement areas</i>.</p>
39	5. Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high-rise developments, in <i>strategic growth areas</i> , and other areas with a <i>compact built form</i> .	<p>Staff analysis</p> <p>This is a new policy in the 2024 PPS. The City’s Official Plan encourages this type of co-location between residential uses, schools and <i>public service facilities</i>. This proposed change will not impact the Official Plan. However, during discussions with school boards, it became clear that the co-location of school space with residential uses is not feasible given how resources are allocated to schools under the Education Act.</p> <p>Recommendations to the Province</p> <p>The City of Ottawa is supportive of the proposed direction. However, changes to the <i>Education Act</i> are required to ensure that this type of co-location is feasible for school boards.</p>

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40	3.2 Transportation Systems	<p>Staff analysis These policies are proposed to be re-located from section 1.6.7 of the current 2020 PPS to Chapter 3.2.</p> <p>Policy 1.6.7.4 of the current 2020 PPS is proposed to be removed in its entirety. The policy reads “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 <i>active transportation</i>.” The removal will not directly impact City policies, but it will weaken the City’s stance during future reviews of the Official Plan to strengthen policies around 15-minute neighbourhoods and <i>active transportation</i>.</p> <p>Recommendations to the Province The City of Ottawa recommends that the language of 1.6.7.4 of the current 2020 PPS be retained in section 3.2 to support the intent of proposed policies 2.1.4 sub-policy a) and 2.3.2, sub-policy c) and d) regarding transportation options with <i>multimodal</i> access and <i>active transportation</i>.</p>
41	3.5 Land Use Compatibility	
42	1. <i>Major facilities</i> and <i>sensitive land uses</i> shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential <i>adverse effects</i> from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of <i>major facilities</i> in accordance with provincial guidelines, standards and procedures.	<p>Staff analysis Policy 1.2.6.2 of the current 2020 PPS are proposed to be re-located to section 3.5. There are concerns with the deletion of policy 1.2.6.2 b) and (c) of the current 2020 PPS that requires the proponent of <i>sensitive land uses</i> to demonstrate the need or evaluate alternative locations for <i>sensitive land uses</i> where avoidance of <i>adverse effects</i> is not possible. The policy also refers to <i>adverse effects</i> to the proposed <i>sensitive land use</i> being minimized and mitigated. The potential health concerns related to land use compatibility related to <i>major facilities</i> and <i>sensitive land uses</i> need to be planned and developed to avoid, minimize, and mitigate any potential <i>adverse effects</i> from odour, air pollutants, noise, and other contaminants.</p> <p>Recommendations to the Province The City of Ottawa recommends strengthening the policy to improve public health protective measures by requiring appropriate separations and mitigation of impacts where necessary.</p> <p>Ottawa Public Health uses the Ontario Ambient Air Quality Criteria to monitor air quality. The criteria are based on health effects and should be incorporated in this policy to minimize risk to public health.</p> <p>The City of Ottawa recommends that proposed policy 3.5.1 be re-written as: “<i>Sensitive land uses</i> shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential <i>adverse effects</i> from odour, noise and other contaminants, minimize risk to public health and safety, and to</p>

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		ensure the long-term operational and economic viability in accordance with provincial guidelines, standards and procedures, and the Ontario’s Ambient Air Quality Criteria.”
43	3.6 Sewage, Water and Stormwater	This section replaces 1.6.6 in the 2020 PPS.
44	1. Planning for sewage and water services shall: a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services; b) ensure that these services are provided in a manner that: 1. can be sustained by the water resources upon which such services rely; 2. is feasible and financially viable over their life cycle; 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and 4. aligns with comprehensive municipal planning for these services, where applicable.	This policy replaces 1.6.6.1 in the 2020 PPS.

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	<p>c) promote water and energy conservation and efficiency; d) integrate servicing and land use considerations at all stages of the planning process, including consideration of opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to meet current and projected needs for increased housing supply; e) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5; and f) integrate with source protection planning.</p>	
45	<p>2. <i>Municipal sewage services</i> and <i>municipal water services</i> are the preferred form of servicing for <i>settlement areas</i> to support protection of the environment and minimize potential risks to human health and safety. For clarity, <i>municipal sewage services</i> and <i>municipal water services</i> include both centralized servicing systems and decentralized servicing systems.</p>	<p>Staff analysis This policy replaces 1.6.6.2 in the 2020 PPS. The current definitions for <i>municipal sewage services</i> and <i>municipal water services</i> both refer to “centralized” and “decentralized” servicing systems, with no reference to either of these systems in the policy text. The proposed PPS seeks to remove the references to “centralized” and “decentralized” servicing systems from the definitions and refers to them in proposed policy 3.6.2. The policies seem to achieve similar objectives to the current policies, however, staff are not sure why the change is proposed.</p> <p>Recommendations to the Province The City of Ottawa requests clarity as to why references to “centralized” and “decentralized” servicing systems were re-located from the definitions to the policy, and whether this will make it easier for decentralized servicing systems to occur. The City of Ottawa has taken the stance that a centralized servicing system is the preferred and most cost-effective way to deliver services.</p>

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46	<p>5. Partial services shall only be permitted in the following circumstances:</p> <ul style="list-style-type: none"> 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. c) within rural settlement areas where new development will be serviced by individual on-site water services in combination with municipal sewage services or private communal sewage services. 	<p>Staff analysis This policy replaces 1.6.6.5 in the 2020 PPS. Proposed policy 3.6.5 c) is a new sub-policy that may permit partial servicing, even if a) and b) are not met. The sub-policy does not contemplate individual septic and communal water systems. This combination of partial systems exists in some areas in Ottawa.</p> <p>Recommendations to the Province The City of Ottawa recommends modifying 3.6.5.c) as follows:</p> <ul style="list-style-type: none"> c) within rural settlement areas where new development will be serviced by, either individual on-site water services in combination with municipal sewage services or private communal sewage services, or municipal water services in combination with individual on-site sewage services or private communal sewage services.
47	<p>8. Planning for stormwater management shall:</p> <ul style="list-style-type: none"> a) be integrated with planning for <i>sewage and water services</i> and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; 	<p>Staff analysis This policy replaces 1.6.6.7 in the 2020 PPS. The proposed policy adds “retrofitted as appropriate” in the planning of stormwater management. This supports the council-approved retrofit studies and implementation plans, as indicated in the Official Plan. The City has plans for future retrofit studies under the City’s stormwater retrofit program. Further, the change on full life cycle provides support to the City’s lifecycle management as part of the Comprehensive Asset Management Framework.</p> <p>The changes proposed to this chapter support a watershed-based approach to stormwater planning, including the City’s current requirements for water budgets, impacts on source water protection, and cumulative impact assessment.</p>

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	<ul style="list-style-type: none"> b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of <i>green infrastructure</i>; d) mitigate risks to human health, safety, property and the environment; e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and <i>low impact development</i>; and g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a <i>watershed</i> scale. 	<p><u>Recommendations to the Province</u> The City of Ottawa is supportive of the direction provided by this policy.</p>
48	3.9 Public Spaces, Recreation, Parks, Trails and Open Space	This section replaces 1.5 in the 2020 PPS.
49	1. Healthy, active, and inclusive communities should be promoted by:	<p><u>Staff analysis</u> These policies replace section 3.9 in the 2020 PPS. These policies align very well with the policies in the City’s Official Plan and the approach proposed for the new Greenspace and Urban Forest Master Plan.</p>

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	<p>a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate <i>active transportation</i> and community connectivity;</p> <p>b) planning and providing for the needs of persons of all ages and abilities in the distribution of 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;</p> <p>c) providing opportunities for public access to shorelines; and</p> <p>d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.</p>	<p>Recommendations to the Province</p> <p>The City of Ottawa supports the proposed policy’s focus on healthy, active, and inclusive communities. It highlights, however, a discrepancy between this policy and the reference to <i>complete communities</i> in proposed policy 2.1.4.</p> <p>Proposed policy 2.1.4 should be amended to also include “healthy and resilient” or “healthy, active, and inclusive” as an objective for <i>complete communities</i>. The definition for <i>complete communities</i> also needs to be modified to reflect this change.</p>
50	Chapter 4: Wise Use and Management of Resources	This chapter replaces 2.0 Wise Use and Management of Resources in the 2020 PPS.
51	4.2 Water	These policies replace section 2.2. in the 2020 PPS.

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52	<p>1.Planning authorities shall protect, improve or restore the <i>quality and quantity of water</i> by:</p> <ul style="list-style-type: none"> a) using the <i>watershed</i> 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 <i>negative impacts</i>, including cross-jurisdictional and cross-watershed impacts; c) identifying <i>water resource systems</i>; d) maintaining linkages and functions of <i>water resource systems</i>; e) implementing necessary restrictions on development and <i>site alternation</i> to: <ul style="list-style-type: none"> 1. protect drinking water supplies and <i>designated vulnerable areas</i>; and 2. protect, improve or restore <i>vulnerable</i> surface and ground water, and their <i>hydrologic functions</i>; f) planning for efficient and sustainable use of water resources, through practices for 	<p>Staff analysis This policy replaces 2.2.1.1 in the 2020 PPS. The new water resource policies appear to maintain or strengthen current protections, although details around the types of <i>water resource systems</i>, which were once listed in policy, are proposed to be re-located from the policy to the definition of <i>water resource systems</i>.</p> <p>Recommendations to the Province The City of Ottawa is supportive of the direction provided by this policy.</p>

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	water conservation and sustaining water quality; and g) ensuring consideration of environmental lake capacity, where applicable.	
53	3. Municipalities are encouraged to undertake, <i>and large and fast-growing municipalities shall undertake watershed planning to inform planning for sewage and water services and stormwater management, including low impact development, and the protection, improvement or restoration of the quality and quantity of water.</i>	<p>Staff analysis This is a new policy. The addition of this policy supports the City’s approach to <i>watershed planning</i> and provides a potentially powerful tool for the regulation of land <i>development</i>.</p> <p>Recommendations to the Province The City of Ottawa is supportive of the direction provided by this policy.</p>
54	4.3 Agriculture	This section replaces section 2.3 in the 2020 PPS.
55	4.3.1 General Policies for Agriculture	
56	1. Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.	<p>Staff analysis The City of Ottawa notes that no agricultural system approach assessment has been done for the National Capital Region. This may lead to interpretation issues regarding what can be considered agricultural lands.</p> <p>The agricultural land base in policy 2 is not defined.</p> <p>Recommendation to the Province The City of Ottawa recommends that a definition of agricultural land base be added.</p>

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	2. As part of the agricultural land base, prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture.	
57	4.3.2 Permitted Uses	
58	4. A principal dwelling associated with an agricultural operation may be permitted in <i>prime agricultural areas</i> as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1 b).	<p>Staff analysis This is a new policy that allows for a principal dwelling unit as an agricultural use and up to two additional residential units within the same building, attached to the principal dwelling, or entirely separate provided it is in close proximity.</p> <p>The City of Ottawa’s Agricultural Resource Area designation functions as <i>prime agricultural areas</i> as defined by the current 2020 PPS. The Official Plan only permits for a single detached dwelling and accommodation for labour on Agricultural Resource Area lands.</p> <p>The current 2020 PPS limits the ability to develop in <i>prime agricultural areas</i>. However, the proposed PPS will permit the development of up to two dwelling units in addition to the principal dwelling in <i>prime agricultural areas</i> using private services provided they are able to satisfy the listed criteria in proposed policy 4.3.2.5 (a – d).</p>
59	5. Where a residential dwelling is permitted on a lot in a prime agricultural area, up to two additional residential units shall be permitted in accordance with provincial guidance, provided that any additional residential units: a)-comply with the <i>minimum distance separation formulae</i> ; b)-are compatible with, and would not hinder, surrounding agricultural operations; c) -have appropriate <i>sewage and water services</i> ; d) address any public health and safety concerns;	<p>Recommendations to the Province The City of Ottawa supports the permission for additional dwellings but has concerns with the potential to build two new additional detached dwellings prior to enacting lot creation policy 4.3.3.1.c).</p>

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	<p>e) are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and</p> <p>f) minimize land taken out of agricultural production.</p> <p>The additional residential units may only be severed from the lot containing the principal dwelling in accordance with policy 4.3.3.1.</p>	
60	4.3.3 Lot Creation and Lot Adjustments	
61	<p>1. Lot creation in <i>prime agricultural areas</i> is discouraged and may only be permitted in accordance with provincial guidance for:</p> <p>a) <i>agricultural uses</i>, 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;</p> <p>b) <i>agriculture-related uses</i>, provided that any new lot will be limited to a minimum size needed</p>	<p>Staff analysis This policy mostly mirrors policy 2.3.4.1 in the current PPS. However, a re-wording in sub-policy c) from “as a result of farm consolidation” to “per farm consolidation” could be used to justify severances for dwellings that were built under 4.3.2.5, rather than for a bona fide residence surplus through farm consolidation.</p> <p>Despite the Province removing proposed language from the draft 2023 PPS that permitted up to three lots, this policy could work with 4.3.2.5 to achieve a similar result of removing agricultural lands through lot creation and new dwellings and introducing new incompatibilities.</p> <p>Recommendations to the Province The City of Ottawa recommends reverting to the existing wording for 4.3.3.1 c), being “a residence surplus to a farming operation as a result of farm consolidation....”.</p> <p>The City of Ottawa also recommends that a new circumstance be added to 4.3.3.1.c) that restricts lot creation from farm consolidation in circumstances where there are no existing additional dwellings that are detached from the principal dwelling. Such an approach is consistent with circumstance number 2 that proposes to prohibit new dwellings and additional residential units on the remnant parcel of farmland and ensures this intent is not circumvented by building the additional detached dwelling(s) prior to a farm consolidation.</p>

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	<p>to accommodate the use and appropriate <i>sewage and water services</i>;</p> <p>c) up to one <i>residence surplus to an agricultural operation</i> per farm consolidation, provided that:</p> <ol style="list-style-type: none"> 1. the new lot will be limited to a minimum size needed to accommodate the use and appropriate <i>sewage and water services</i>; and 2. the planning authority ensures that new dwellings and additional residential units are prohibited on any remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the remnant parcel may be recommended by the Province, or based on municipal approaches which achieve the same objective. <p>d) <i>infrastructure</i>, where the facility or corridor cannot be accommodated through the use of easements or rights-of-way.</p>	
62	4.3.5 Non-Agricultural Uses in Prime Agricultural Areas	<u>This section replaces 2.3.6 in the 2020 PPS.</u>

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63	2. Impacts from any new or expanding non-agricultural uses on the <i>agricultural system</i> are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an <i>agricultural impact assessment</i> or equivalent analysis, based on provincial guidance.	<p>Staff analysis</p> <p>This policy replaces 2.3.6.2 in the 2020 PPS. The City of Ottawa typically does not conduct an <i>agricultural impact assessment</i> for the expansion of a non-agricultural use on surrounding agricultural lands. Currently, no City staff are trained or qualified to review these assessments (or testify on their behalf at the Tribunal) and are usually sent out to a consultant on a standing offer. Additional resources for staff or consulting assignments may be required.</p> <p>The four provincial land use plans (Growth Plan, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan) have policy requirements for Agricultural Impact Assessment (AIAs) that provide support for the long term prosperity of agriculture. Draft AIA Guidelines have been prepared by OMAFRA which state that “where an AIA is not required in land use policies (e.g. in areas outside of the GGH), it is encouraged as an effective tool to assess, avoid, minimize and mitigate impacts to agriculture.” Ottawa is consulting with OMAFRA to determine how the proposed policy change by referring specifically to the <i>agricultural system</i> will impact Ottawa should it wish to require AIAs as recommended in the draft provincial guidelines.</p> <p>Recommendations to the Province</p> <p>Given that farmland accounts for approximately 40 per cent of Ottawa’s Rural area and the PPS requirement for municipalities to protect farmland for long-term agricultural production, it is appropriate that Ottawa’s farmlands are included as a part of Ontario’s <i>agricultural system</i> or that additional wording be provided to allow for municipalities outside the GGH to be able to implement this policy.</p> <p>The agricultural system and agri-food network should be assessed. Provincial guidance speaks to the potential of these extending beyond municipal boundaries; however, the agri-food network is a regional scale at minimum. This is not reflected in AIA guidance nor definitions and other guidance from the Province. These should be redefined as the current gap could undermine the protection of prime agriculture lands. There is also no guidance regarding the cumulative impacts of AIAs supporting conversion of lands.</p>
64	4.6 Cultural Heritage and Archaeology	This section replaces 2.6 in the 2020 PPS.

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65	1. <i>Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.</i>	<p>Staff analysis This policy replaces 2.6.1 in the 2020 PPS. The concept of significant <i>built heritage resources</i> has been removed and replaced with “<i>protected heritage property</i>”. This definition generally restricts what is considered “heritage” under the current 2020 PPS to designated properties or those protected federally or provincially.</p> <p>One potential gap is the definition’s inclusion of “property protected under federal heritage legislation”. As of May 2023, no such federal heritage legislation exists with the exception of the <i>Heritage Railway Stations Protections Act</i> and the <i>Heritage Lighthouse Protection Act</i>, both of which have limited applicability. Both the current 2020 and proposed PPS refer to “property protected under federal legislation”. National Historic Sites are designated under the <i>Historic Sites and Monuments Act</i> but are not “protected” by federal legislation. The City recommends that the Province revise the definition that it be expanded to address an existing gap from the current 2020 PPS.</p> <p>Ottawa, perhaps more than other parts of the province, is home to many federally-owned heritage properties that are designated by the Federal Heritage Buildings Review Office under the Treasury Board policy on Management of Real Property. Many of these sites, such as the Central Experimental Farm are also National Historic Sites. The consideration of these important protected heritage properties as part of the planning process has been overlooked in this change to the PPS.</p> <p>Recommendations to the Province The definition of <i>protected heritage property</i> should be modified to include: “Designated National Historic Sites” and “Federally-owned properties designated by the Federal Heritage Buildings Review Office”.</p>
66	3. Planning authorities shall not permit development and <i>site alteration</i> on adjacent lands to <i>protected heritage property</i> unless the <i>heritage attributes</i> of the <i>protected heritage property</i> will be conserved.	<p>Staff analysis This policy is a slight change from the wording of policy 2.6.3 in the current 2020 PPS. The change comes from the removal of the City’s ability to define adjacency within an Official Plan, as set out in the new definition of <i>adjacent</i>. This change in definition means that the City can only assess heritage impacts and provide comments on <i>development</i> applications <i>adjacent</i> to protected properties when they are directly contiguous to the subject site.</p> <p>In Ottawa, this means the City generally loses its ability to assess the impacts and provide heritage comment on applications <i>adjacent</i> to two of the most significant heritage resources in the city - the Rideau Canal UNESCO World Heritage Site and the Central Experimental Farm (CEF) National Historic Site of Canada as the <i>adjacent</i> roads and pathways mean few developable parcels abut the canal or the CEF. For example, properties west of Colony-By Drive would be proposed to not be considered <i>adjacent</i> to the Rideau Canal.</p>

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		<p>Additionally, it is not clear how this policy will apply to Heritage Conservation Districts (HCD), particularly older HCDs that do not have property specific attributes defined. The Province has stated that an amendment process for HCDs will come into effect through regulation, but staff have no information on its form, requirements, or when this process will be released in draft form.</p> <p>Recommendations to the Province The definition of <i>adjacent lands</i> as it relates to protected heritage properties should reinstate the ability of municipalities to define adjacency within an Official Plan. Alternatively, it should provide for options related to circumstances such as those described above for the Rideau Canal and the Central Experimental Farm.</p> <p>The City of Ottawa recommends that the Province revise the wording of this policy to clarify its application to Heritage Conservation Districts or landscapes.</p>
67	Chapter 5: Protecting Public Health and Safety	<p>This chapter replaces chapter 3 in the 2020 PPS.</p> <p>Staff analysis The preamble of Chapter 3.0 – Protecting Public Health and Safety of the current 2020 PPS is proposed to be removed in its entirety, which would seek to eliminate necessary direction on “mitigating potential risk to public health”.</p> <p>Recommendations to the Province The City of Ottawa recommends that the proposed PPS retain and add the preamble of Chapter 3.0 of the current 2020 PPS that addresses mitigating potential risks to public health as the pre-able of Chapter 5. Include additional words “human hazards” as follows: “Mitigating potential risk to public health or safety or of property damage from natural and human hazards, including the risks that may be associated with the <i>impacts of a changing climate.</i>”</p>
68	5.1 General Policies for Natural and Human-Made Hazards	This is a new policy section in the 2020 PPS.
69	1. Development shall 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	<p>Staff analysis The proposed policy will replace “mitigating potential risk” to “unacceptable risks”, though neither the current or proposed PPS, or other provincial legislation, defines what is considered to be “unacceptable”. City staff currently assume that “unacceptable risk” is a lower threshold to public safety than “mitigating potential risk”.</p>

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	damage, and not create new or aggravate existing hazards.	<p>The <i>Ontario Health Promotion and Protection Act</i>, however, does define a “public health risk” and therefore can be relied upon for consistent interpretation across planning authorities.</p> <p>Recommendations to the Province The City of Ottawa recommends that policy 5.1.1 be re-worded accordingly: “<i>Development</i> shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk a public health or safety risk, as defined by the <i>Health Promotion and Prevention Act</i>, or of property damage, and not create new or aggravate existing hazards.”</p>
70	5.2 Natural Hazards	
71	1. Planning authorities shall, in collaboration with conservation with conservation authorities where they exist, identify <i>hazardous lands</i> and <i>hazardous sites</i> and manage development in these areas, in accordance with provincial guidance.	<p>Staff analysis This is proposed to be a new policy that supports past and proposed reductions in the role of Conservation Authorities in regulating <i>hazardous lands</i> subject to <i>development</i> applications.</p> <p>Recommendations to the Province The City of Ottawa supports the current role of Conservation Authorities in regulating all <i>hazardous lands</i>, including those subject to <i>development</i> applications. The City reiterates its request that it not be prescribed as an area where lands subject to <i>development</i> applications would be excluded from Conservation Authority regulation. Such a move would have significant resource implications for the City and would disrupt and delay the review of <i>Planning Act</i> applications.</p>
72	Chapter 6: Implementation and Interpretation	This chapter replaces 4.0 in the 2020 PPS.
73	6.2 Coordination	This section replaces 1.2 in the 2020 PPS.
74	5. Planning authorities shall collaborate with publicly-assisted post-secondary institutions, where they exist, to facilitate early and integrated planning for student housing that considers the full range of housing options	<p>Staff analysis New proposed policies require that municipalities collaborate with certain post-secondary institutions to facilitate the development of student housing. Further, the policies encourage municipalities to implement a student housing strategy.</p> <p>As part of the legislative changes proposed through Bill 185, the Province proposes to exempt certain post-secondary institutions from <i>Planning Act</i> requirements.</p>

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	<p>near existing and planned post-secondary institutions to meet current and future needs.</p> <p>6. Further to policy 6.2.5, planning authorities should collaborate with publicly-assisted post-secondary institutions on the development of a student housing strategy that includes consideration of off-campus housing targeted to students.</p> <p>2.4.1.3 planning authorities should: [...] d) consider a student housing strategy when planning for strategic growth areas;</p>	<p><u>Recommendations to the Province</u> While the City supports the provision of a full range of housing options, including student housing, there is a lack of clarity regarding how municipalities will partner with post-secondary institutions in light of the proposed changes. The City recommends that the Province provide more clarity concerning these changes.</p>
75	Chapter 7: Definitions	
76	Complete communities: means places such as mixed-use neighbourhoods or other areas within cities, towns, and <i>settlement areas</i> that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities,	<p><u>Staff analysis</u> The characteristics of <i>complete communities</i> also needs to be “healthy and resilient” or “healthy, active, and inclusive”.</p> <p><u>Recommendations to the Province</u> The City recommends that the definition for <i>complete communities</i> be modified as follows: “means places such as healthy and resilient mixed-use neighbourhoods [...]” or “means places such as healthy, active, and inclusive mixed-use neighbourhoods [...]”</p> <p>The City of Ottawa prefers “healthy and resilient”, however, the City would support the inclusion of “healthy, active, and inclusive” as it aligns with the language in section 3.9.</p>

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	including an appropriate mix of jobs, a full range of housing, transportation options, <i>public service facilities</i> , local stores and services. <i>Complete communities</i> are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.	
77	Green infrastructure: means natural and human-made elements that provide ecological and hydrological functions and processes. <i>Green infrastructure</i> can include components such as natural heritage features and systems, parklands, stormwater management systems, street trees, urban forests, natural channels, permeable surfaces, and green roofs.	<u>Recommendations to the Province</u> Given the role of <i>green infrastructure</i> in policy 2.9.1, the City recommends revising the definition of <i>green infrastructure</i> by adding ecological services to functions and processes to include shade as a component of <i>green infrastructure</i> : Green infrastructure: means natural and human-made elements that provide ecological and hydrological functions, services , and processes. <i>Green infrastructure</i> can include components such as natural heritage features and systems, parklands, stormwater management systems, street trees, private trees , urban forests, natural channels, permeable surfaces, and green roofs.
78	Energy storage system: means a system or facility that captures energy produced at one time for use at a later time to reduce imbalances between energy demand and energy production, including for example, flywheels, pumped hydro storage, hydrogen storage, fuels storage,	<u>Staff analysis</u> The City acknowledges the definition for energy storage addressing the City's previous comments.

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	compressed air storage, and battery storage.	
79	Higher order transit: means transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. <i>Higher order transit</i> can include heavy rail (such as subways, elevated or surface rail, and commuter or regional inter-city rail), light rail, and buses in dedicated rights-of-way.	Staff analysis This definition is currently in the Growth Plan for the Greater Golden Horseshoe and will be introduced to the PPS. The City’s Official Plan jointly refers to Light Rail Transit and Bus Rapid Transit as “rapid transit”, which functions similarly to <i>higher order transit</i> . Recommendations to the Province N/A
80	Housing options: means a range of housing types such as, but not limited to single-detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses, multi-residential buildings, including low- and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community	Staff analysis The proposed definition makes minor adjustments to include additional housing forms, but notably removes references to affordable housing. Recommendations to the Province The City recommends including a reference to affordable housing in the proposed definition for <i>housing options</i> .

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	homes, <i>additional needs housing</i> , multi-generational housing, student housing, farm worker housing, culturally appropriate housing, supportive, community and transitional housing and housing related to employment, educational, or <i>institutional uses</i> , such as long-term care homes.	
81	Large and fast-growing municipalities: means municipalities identified in Schedule 1.	<p>Staff analysis Ottawa has been identified as a <i>Large and fast-growing municipality</i>. Specific policies relating to intensification and <i>strategic growth areas</i> are prescribed and discussed in the above rows of this table. The proposed PPS introduces a new Schedule 1, which lists the municipalities that are identified as <i>large and fast-growing</i>.</p> <p>Recommendations to the Province The City of Ottawa supports the proposed definition and supports of being identified as a <i>large and fast-growing municipality</i>.</p>
82	<p>Deletion of Low and moderate income households</p> <p>Low and moderate income households: means</p> <p>a) in the case of ownership housing, households with incomes in the lowest 60 percent of the income distribution for the municipality; or</p> <p>b) In the case of rental housing, household with incomes in the lowest 60 percent of the income distribution for renter households for the municipality</p>	<p>Staff analysis The City of Ottawa acknowledges the inclusion of the 2020 PPS definition for low and moderate income households. This addresses the City’s previous comments.</p>

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83	Major transit station area: means the area including and around any existing or planned <i>higher order transit station</i> or stop within a <i>settlement area</i> ; or the area including and around a major bus depot in an urban core. <i>Major transit station areas</i> generally are defined as the area within an approximate 500 to 800 metre radius of a transit station.	Staff analysis The City’s Official Plan refers to the same concept as “Protected Major Transit Station Areas”, to mirror the reference from the <i>Planning Act</i> , whereas <i>Major Transit Station Area</i> is the term used in the Growth Plan for the Greater Golden Horseshoe. The City may consider an amendment to the Official Plan to re-name “Protected <i>Major Transit Station Areas</i> ” simply to <i>Major Transit Station Areas</i> . The City of Ottawa acknowledges the addition of the word “approximately”, which addresses the City’s previous comments.
84	Surface water feature: means water-related features on the earth’s surface, including headwaters, rivers, permanent and intermittent streams, inland lakes, seepage areas, recharge/discharge areas, springs, wetlands, and associated riparian lands that can be defined by their soil moisture, soil type, vegetation or topographic characteristics.	Staff analysis This definition has been only slightly modified (replacing stream channels with permanent and intermittent streams). The City’s Official Plan uses a slightly modified version of the current 2020 PPS definition. Recommendations to the Province N/A
85	Watershed planning: means planning that provides a framework for establishing comprehensive and integrated goals, objectives, and direction for the protection, enhancement, or restoration of water resources, including the <i>quality and quantity of water</i> , within a <i>watershed</i> and	Staff analysis <i>Watershed planning</i> can occur at different scales including planning within a <i>watershed</i> through <i>subwatersheds</i> and <i>catchment areas</i> . Recognizing planning that occurs within <i>watersheds</i> implements the goals and objectives of the larger <i>watershed</i> area. The City of Ottawa acknowledges that the Province has addressed the City’s previous comments by adjusting the definition to note that <i>watershed planning</i> may occur at different spatial scales.

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	for the assessment of cumulative, cross-jurisdictional, and cross-watershed impacts. <i>Watershed planning</i> evaluates and considers the <i>impacts of a changing climate on water resource systems</i> and is undertaken at many scales. It may inform the identification of <i>water resource systems</i> .	