

## Appendix A: City of Ottawa’s Analysis of the Proposed Provincial Planning Statement (2023)

Row no.	Portion of the PPS <a href="#">ERO – 019-6813</a> <i>Italicized = defined term in the proposed PPS</i>	Staff analysis and recommendations to the Province <b>Bold = language proposed to be added</b>
	<b>Chapter 1: Introduction</b>	
1	<p><b>How to Read this Policy Statement</b></p> <p>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.</p>	<p><b>Staff analysis</b> N/A</p> <p><b>Recommendations to the Province</b> The City of Ottawa recommends adding the following reference to “health”:</p> <p>“How to Read this Policy Statement The provincial policy-led planning system recognizes and addresses the complex interrelationships among environmental, economic, <b>health</b> 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.”</p>
	<b>Vision</b>	
2	<p>Second paragraph:</p> <p>The long-term prosperity and social well-being of Ontario depends on celebrating these differences and planning for <i>complete communities</i> 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 competitive economy, and a clean and healthy environment. Ontario will increase the supply and mix of <i>housing options</i> 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. Ontario’s land use planning framework, and the decisions that are made, shape how our communities grow and prosper. While progress has been</p>	<p><b>Staff analysis</b> The proposed Provincial Planning Statement has removed reference to healthy communities in the vision.</p> <p>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.</p> <p>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.</p> <p><b>Recommendations to the Province</b> 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 <b>healthy complete communities</b> for people of all ages, abilities and incomes. [...]”</p>

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	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.	Municipalities will work with the Province to design <b>healthy and resilient communities</b> with increased access to housing, employment, schools, transportation options, recreation and public spaces, and services that are equitable and sustainable for all Ontarians.”
3	<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><b>Staff analysis</b> 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><b>Recommendations to the Province</b> 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>
4	<b>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities</b>	<p><b>Staff analysis</b> 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>

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		<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.</p> <p>This also contradicts directives to Ontario Boards of Health, through the <a href="#">Ontario Public Health Standards Requirements for Programs, Services and Accountability, which states</a> “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><b><u>Recommendations to the Province</u></b> The City 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>
	<b>2.1 – Planning for People and Homes</b>	
5	<p>1. At the time of 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 25 years, informed by provincial guidance. Planning for <i>infrastructure, public service facilities, strategic growth areas</i> and <i>employment areas</i> 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 infrastructure plans</p>	<p><b><u>Staff analysis</u></b> 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 25 years. <i>Infrastructure, employment areas</i> and <i>strategic growth areas</i> are expressly allowed to extend beyond this horizon.</p> <p>The City’s Official Plan designates lands to 2046 and meets the minimum 25-year requirement. 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> <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><b><u>Recommendations to the Province</u></b> 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.</p>

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		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.
6	<p>4. Planning authorities should support the achievement of <i>complete communities</i> by:</p> <p>a) accommodating an appropriate range and mix of land uses, <i>housing options</i>, transportation options with <i>multimodal</i> access, employment, <i>public service facilities</i> and other <i>institutional uses</i> (including, schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;</p> <p>b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and</p> <p>c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.</p>	<p><b>Staff analysis</b></p> <p>The proposed policy 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><b>Recommendations to the Province</b></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 <b>healthy and resilient</b> 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</i> <b>that include a range of affordability</b>, [...]”.</p> <p>The City recommends the Province adjust sub-policy (c) to also refer to “<b>economic</b> 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>
	<b>2.2 Housing</b>	
7	<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) coordinating land use planning and planning for housing with Service Managers to address the full range of <i>housing options</i></p>	<p><b>Staff analysis</b></p> <p>The proposed policies remove the requirement for municipalities to establish minimum targets for affordable to low- and moderate-income households and removes references to <i>affordable housing</i> including the definition in Chapter 7. The proposed PPS also notes the role of <i>Service Managers</i> in the coordination of land use planning and planning for housing to address the full range of housing options, but <i>Service Managers</i> is not defined.</p>

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	<p>including housing affordability needs;</p> <p>b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>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</li> <li>2. all types of residential <i>intensification</i>, including the conversion of existing commercial and institutional buildings 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;</li> </ol> <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>	<p>References to housing affordability in the proposed PPS have been re-located to this chapter and no longer refer to “affordable housing” but rather as “a full range of <i>housing options</i>”, which are more general than the current 2020 PPS.</p> <p><b><u>Recommendations to the Province</u></b></p> <p>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. Service Managers should be defined. If the concept is the same as under the <i>Housing Services Act</i>, Service Managers do not address <i>housing options</i> outside of housing affordability needs, particularly market housing. Proposed policy 2.2, 1)(a) should more clearly separate the coordination of land use planning and the coordination of planning for housing under the authority of Service Managers.</p> <p>The City of Ottawa would like clarity on the rationale for removing the definition and reference to <i>low and moderate income households</i> and targets for new affordable units. If affordable housing is not considered in the proposed PPS, the City would like to know what other provincial legislation defines affordability that would support any municipal affordable housing initiatives, particularly when coordination across jurisdictions will require a common definition.</p>
<b>8</b>	<p><b>2.3 Settlement Areas and Settlement Area Boundary Expansions</b></p> <p>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>	<p><b><u>Staff analysis</u></b></p> <p>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><b><u>Recommendations to the Province</u></b></p> <p>N/A</p>
<b>9</b>	<p>2. Land use patterns within <i>settlement areas</i> should be based on densities and a mix of land uses which:</p> <ol style="list-style-type: none"> <li>a) efficiently use land and resources;</li> <li>b) optimize existing and planned <i>infrastructure</i> and <i>public service facilities</i>;</li> </ol>	<p><b><u>Staff analysis</u></b></p> <p>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>

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	<p>c) support <i>active transportation</i>;  d) are <i>transit-supportive</i>, as appropriate; and  e) are <i>freight-supportive</i>.</p>	<p><b><u>Recommendations to the Province</u></b>  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>
10	<p>3. Planning authorities should support <i>intensification and redevelopment</i> to support the achievement of <i>complete communities</i>, including by planning for a range and mix of <i>housing options</i> and prioritizing planning and investment in the necessary <i>infrastructure and public service facilities</i>.</p>	<p><b><u>Staff analysis</u></b>  This policy replaces 1.1.3.3, 1.1.3.4, 1.1.3.5, 1.1.3.6, and 1.1.3.7 of the current 2020 PPS. The largest impact is the removal of the requirement to establish minimum targets for <i>intensification</i>.</p> <p><b><u>Recommendations to the Province</u></b>  The City recommends that the language from policies 1.1.3.5, relating to requiring minimum <i>intensification</i> targets of the current 2020 PPS be retained.</p>
11	<p>4. In identifying a new <i>settlement area</i> or allowing a <i>settlement area</i> boundary expansion, planning authorities should consider the following:</p> <p>a) that there is sufficient capacity in existing or planned <i>infrastructure and public service facilities</i>;  b) the applicable lands do not comprise <i>specialty crop areas</i>;  c) the new or expanded <i>settlement area</i> complies with the <i>minimum distance separation formulae</i>;  d) impacts on agricultural lands and operations which are adjacent or close to the <i>settlement area</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> or equivalent analysis, based on provincial guidance; and  e) the new or expanded <i>settlement area</i> provides for the phased progression of urban development.</p>	<p><b><u>Staff analysis</u></b>  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 Official Plan Amendment by a private-landowner or the municipality at any given time. However, these amendments are not appealable if refused or a decision has not been made.</p> <p>The strength of the municipal comprehensive review is the relative comparison of candidate parcels to select the parcels that best fit the framework identified in the PPS, including the proposed PPS. This detailed analysis ensures efficient development patterns, protects resources, ensures effective use of <i>infrastructure and 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>The proposed PPS removes the requirement that expansion of <i>settlement areas</i> should demonstrate that the <i>infrastructure and public service facilities</i> which are planned or available are suitable for the <i>development</i> over the long term, and are financially viable over their life cycle. This has been replaced with only the consideration that there is sufficient capacity in the existing or <i>planned infrastructure and public service facilities</i>. This takes away any long-term financial implications to the municipality on <i>infrastructure</i> capacity planning. This will also lead to piecemeal applications to consume and reserve remaining infrastructure capacity without a review of other areas that could utilize remaining capacity sooner and more cost effectively.</p> <p>The proposed PPS removes the current 2020 PPS requirement for expansion of <i>settlement areas</i> to demonstrate that sufficient opportunities to accommodate growth and to satisfy market demand are not available through <i>existing designated supply</i>, and to</p>

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		<p>accommodate the projected needs over the identified planning horizon. A review of existing designated supply to accommodate the needs during the planning horizon should occur before a <i>settlement area</i> is considered for expansion.</p> <p>The revised policy also seeks to reduce protections for <i>prime agricultural areas</i> when expanding a <i>settlement area</i>, focusing specifically on <i>specialty crop areas</i> (which are not present in many Ontario cities outside the Niagara area) and on agricultural lands and operations (undefined terms, which could be interpreted as actively farmed lands only).</p> <p>Proposed sub-policy (d) would require that an <i>agricultural impact assessment</i> be undertaken when agricultural lands may be affected by a proposed new <i>settlement area</i> or <i>settlement area</i> expansion. Additional resources for staff or consulting assignments may be required.</p> <p>The proposed policies weaken the overall protection of <i>prime agricultural lands</i>, a non-renewable resource, by removing the current 2020 PPS requirement for the evaluation of alternative locations and that lands can only be considered if there are no reasonable alternatives to <i>prime agricultural lands</i>. Official Plan Amendments for expansion parcels do not include alternative locations for evaluation, which currently is possible through a municipal comprehensive review.</p> <p>The proposed policies also refer to “agricultural lands”, which is an undefined term.</p> <p><b><u>Recommendations to the Province</u></b></p> <p>The City of Ottawa supports the existing 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>Without the requirement to evaluate alternative locations, sub-policy d) should be reworded so that agricultural lands are avoided without any conditional considerations where avoidance is not possible: “impacts on agricultural lands and operations which are adjacent or close to the <i>settlement area</i> are avoided”.</p> <p>The City recommends that the Province add a policy to review the existing designated supply over the planning horizon before a <i>settlement area</i> is considered to for expansion.</p> <p>The City seeks clarity on how the Province defines “agricultural lands”, as stated in sub-policy (d) and throughout other policies of the proposed PPS. Does the Province intend for this term to be used for lands where <i>agricultural uses</i> occur?</p>



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12	5. Planning authorities are encouraged to establish density targets for new <i>settlement areas</i> or <i>settlement area</i> expansion lands, as appropriate, based on local conditions. <i>Large and fast-growing municipalities</i> are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare.	<p><b>Staff analysis</b></p> <p>This policy carries over from the Growth Plan for the Greater Golden Horseshoe. Future Neighbourhood expansion areas require a minimum of 36 units per net hectare in the Official Plan.</p> <p>The proposed PPS encourages a minimum density target of 50 residents and jobs per gross hectare for new or expanded <i>settlement areas</i>. The City’s Official Plan assigns a minimum density target of 36 units per net hectare for Future Neighbourhoods. The Official Plan target is equivalent to the proposed PPS target as populating the Plan’s minimum target of 36 units per net hectare exceeds 50 residents per gross hectare. However, staff are concerned that rural villages, which are <i>settlement areas</i>, may not be able to meet the provincial target while also taking into consideration locally appropriate characteristics as directed in chapter 2.5 policy 2), particularly villages without municipal or communal wastewater services that require larger lots for on-site services. Ideally the target does not apply to villages and alternative density metrics may also be used to that achieve similar results.</p> <p><b>Recommendations to the Province</b></p> <p>The City of Ottawa has many villages in its <i>rural area</i>, which are <i>settlement areas</i>, however, not all of these villages are publicly serviced. Those <i>settlement areas</i> without municipal servicing may not be able to achieve the minimum target of 50 residents and job per gross hectare. In addition, chapter 2.5, policy 2) directs consideration of locally appropriate rural characteristics in rural <i>settlement areas</i> that may not be able to achieve 50 residents and jobs per gross hectare. The City recommends that the target is not applicable to rural <i>settlement areas</i> and that alternate density targets may be used that achieve similar results.</p>
	<b>2.4 Strategic Growth Areas</b>	
13	1. 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, planning authorities may, and <i>large and fast-growing municipalities</i> shall, identify and focus growth and development in <i>strategic growth areas</i> by: <ul style="list-style-type: none"> <li>a) identifying an appropriate minimum density target for each <i>strategic growth area</i>; and</li> <li>b) identifying the appropriate type and scale of development in <i>strategic growth areas</i> and transition of built form to adjacent areas.</li> </ul>	<p><b>Staff analysis</b></p> <p><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><b>Recommendations to the Province</b></p> <p>To help differentiate between 2.4.1 Strategic Growth Areas and 2.4.2 <i>Major Transit Station Areas</i>, chapter 2.4.1 should describe the range and mix of <i>housing options</i> in <i>strategic growth areas</i> as a hierarchy, with <i>major transit station areas</i> having the highest density and mix of uses all the way to areas with general <i>intensification</i> that result in a net increase in residential units. As proposed, a <i>major transit station area</i> is not clearly distinguished from <i>strategic growth areas</i> that are not MTSAs.</p>
14	2. Any reduction in the size or change in the location of <i>urban growth centres</i> identified in an in effect official plan as of [effective	Proposed policy 2.4.1, 2) should provide context regarding <i>urban growth centres</i> for municipalities outside of the Greater Golden Horseshoe or those that do not have them identified on the relevant schedule to the Growth Plan for the Greater Golden Horseshoe.



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	date] may only occur through a new official plan or official plan amendment adopted under section 26 of the <i>Planning Act</i> .	
15	<p><b>2.4.2 Major Transit Station Areas</b></p> <p>1. <i>Large and fast-growing municipalities</i> 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 a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.</p>	<p><b>Staff analysis</b></p> <p>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>Many of these <i>MTSAs</i> expand large areas that form the logical hub around transit. The <i>MTSAs</i> for the Downtown, the suburban Town Centres and a few others have a radius greater than 800 metres. Pending clarity from the Province, City staff may need to revise the boundaries of certain <i>MTSAs</i> to make sure that they don’t extend beyond the 800-metre radius if it is in fact a maximum.</p> <p>The City’s Official Plan does not designate any <i>MTSAs</i> around its planned bus rapid transit (BRT) stations such as the future Baseline Road and March Road BRT lines. The City may consider delineating <i>MTSAs</i> around these <i>higher order transit</i> stations through an Official Plan Amendment.</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><b>Recommendations to the Province</b></p> <p>Proposed policy 2.4.2, 1) and the definition for <i>major transit station area</i> do not appear to be consistent. The proposed definition in Chapter 7 for “<i>Major Transit Station Areas</i>” states “<u>generally</u> are defined as the area within an <u>approximate 500 to 800 metre</u> radius of a transit station [...]”, whereas proposed policy 2.4.2, 1) states that an <i>MTSA’s</i> “delineation <u>shall define</u> an area <u>within</u> a 500 to 800 metre radius [...]”, implying a maximum radius of 800 metres. Please clarify the language on whether there is flexibility on the distances between the policy and the definition The City of Ottawa is supportive of the proposed direction provided that <i>MTSAs</i> are not restricted to a maximum 800-metre radius.</p> <p>The City suggests the following adjustment: “The delineation shall define an area <b>generally</b> within a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.” A flexible approach would support a number of <i>MTSAs</i> within Ottawa that exceed an 800-metre radius.</p>
16	2. Within <i>major transit station areas</i> on <i>higher order transit corridors</i> , <i>large and fast-growing municipalities</i> shall plan for a minimum density target of:	<p><b>Staff analysis</b></p> <p>These 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</p>

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	<ul style="list-style-type: none"> <li>a) 200 residents and jobs combined per hectare for those that are served by subways;</li> <li>b) 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or</li> <li>c) 150 residents and jobs combined per hectare for those that are served by commuter or regional inter-city rail.</li> </ul>	<p>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>
17	<p>3. For any particular <i>major transit station area, large and fast-growing municipalities</i> 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"> <li>a) <i>development</i> is prohibited by provincial policy or severely restricted on a significant portion of the lands within the delineated area; or</li> <li>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.</li> </ul>	<p>Proposed policy 2.4.2, 3) 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><b><u>Recommendations to the Province</u></b></p> <p>The City 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 under policy 2.4.2, 3).</p>
18	<p>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:</p> <ul style="list-style-type: none"> <li>a) connections to local and regional transit services to support <i>transit service integration</i>;</li> <li>b) <i>infrastructure</i> that accommodates a range of mobility needs and supports <i>active transportation</i>, including sidewalks, bicycle</li> </ul>	<p><b><u>Staff analysis</u></b></p> <p>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><b><u>Recommendations to the Province</u></b></p> <p>The City of Ottawa is pleased to see 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> <b>will</b> be planned</p>

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	lanes, and secure bicycle parking; and c) commuter pick-up/drop-off areas.	<p>and designed to be <i>transit</i>-supportive 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 “<b>cycling facilities</b>” 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>
	<b>2.5 Rural Areas in Municipalities</b>	
<b>19</b>	<p>1. Healthy, integrated and viable <i>rural areas</i> should be supported by:</p> <ul style="list-style-type: none"> <li>a) building upon rural character, and leveraging rural amenities and assets;</li> <li>b) promoting regeneration, including the <i>redevelopment of brownfield sites</i>;</li> <li>c) accommodating an appropriate range and mix of housing in <i>rural settlement areas</i>;</li> <li>d) using <i>rural infrastructure</i> and <i>public service facilities</i> efficiently;</li> <li>e) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;</li> <li>f) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;</li> <li>g) conserving biodiversity and considering the ecological benefits provided by nature; and</li> <li>h) providing opportunities for economic activities in <i>prime agricultural areas</i>, in accordance with policy 4.3.</li> </ul>	<p><b>Staff analysis</b></p> <p>The proposed PPS seeks to remove direction that directs growth and development within rural <i>settlement areas</i> (i.e., villages). The removal of this policy sets up the introduction of multi-lot development outside of rural <i>settlement areas</i>.</p> <p><b>Recommendations to the Province</b></p> <p>The City recommends that the language of current 2020 PPS policy 1.1.4.2 be retained, as this is consistent with the direction outlined in the proposed Chapter 2.3.</p>

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20	<p>2. When directing development in rural <i>settlement areas</i> in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.</p> <p>Growth and development may be directed to <i>rural lands</i> in accordance with policy 2.6, including where a municipality does not have a <i>settlement area</i>.</p>	<p><b>Staff analysis</b> <i>Development</i> within villages shall consider the local context, including available servicing. In accordance with the policies of Chapter 2.6, a municipality may also permit rural lot creation through Consent to Sever, and/or multiple lot creation through Plan of Subdivision outside of villages. Rural lot creation on this scale outside of villages is contrary to the principle of locating growth to where existing infrastructure services, commercial services, and a more robust transportation network to reduce GHG emissions. Ottawa has a strong agricultural presence with 1,000 farm holdings on farmland accounting for 40 per cent of the rural area. The City is concerned that increased pressure for multi-lot subdivisions outside of villages will increase conflicts with agricultural operations, to the detriment of the agricultural operators. This permission is also contrary to Section 2.3 policy 1 in the proposed PPS where settlement areas should be the focus of growth and development.</p> <p><b>Recommendations to the Province</b> Within Ottawa, rural <i>settlement areas</i> are identified as villages in the Official Plan. The City supports the consideration of the local context for <i>development</i> within villages. However, locally appropriate rural characteristics and appropriate service levels may require densities that conflict with the target of 50 residents and jobs per gross hectare, as proposed in Chapter 2.3, policy 5). Existing limitations for rural lot creation outside of villages in the 2020 PPS should be maintained to locate growth closer to existing services, reduce GHG emissions from transportation access, and avoid (not just minimize) conflict with agricultural operators.</p>
	<b>2.6 Rural Lands in Municipalities</b>	
21	<p>1. On <i>rural lands</i> located in municipalities, permitted uses are:</p> <ul style="list-style-type: none"> <li>a) the management or use of resources;</li> <li>b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);</li> <li>c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate <i>sewage</i> and <i>water services</i>;</li> <li>d) <i>agricultural uses, agriculture-related uses, on-farm diversified uses</i> and <i>normal farm practices</i>, in accordance with provincial standards;</li> <li>e) home occupations and home industries;</li> <li>f) cemeteries; and</li> <li>g) other rural land uses.</li> </ul>	<p><b>Staff analysis</b> The current 2020 PPS has a number of policies that limit the ability to develop in a <i>rural area</i> outside of a <i>settlement area</i> (i.e. villages), which are to be removed from the proposed PPS. Proposed policy 2.6, 1)(c) permits lot creation and multi-lot residential development on <i>rural lands</i> where site conditions are suitable for the provision of appropriate sewage and water services, if a municipality has elected to direct development in the <i>rural area</i> outside of villages. Staff are of the opinion that rural growth shall continue to be directed to villages and grandfathered country lot subdivisions. In a future City-initiated Official Plan Amendment, the City will consider the potential relocation of grandfathered country lot subdivisions as per the Council motion when the Official Plan was adopted and provide recommendations.</p> <p>The result of this policy change could be the approval of country lot estate subdivisions on lands where the City could contemplate future urban expansion. Rural subdivisions could supplant more housing as a future urban expansion area and introduces uncertainty in the City’s ability to predict long-term servicing needs in planning of trunk <i>infrastructure</i>.</p> <p><b>Recommendations to the Province</b> The PPS currently recognizes that “efficient development patterns optimize the use of land, resources and public investment” and that they “support the financial well-being of the province and municipalities over the long term [...]”. In most instances, rural <i>development</i> does not represent an efficient or cost-effective land use pattern, and for that reason the current 2020 PPS</p>

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		<p>discourages rural lot creation except in very specific circumstances. The City of Ottawa does not support policy changes that would make rural lot creation for residential <i>development</i> easier to obtain outside of established <i>settlement areas</i>. Not only would it result in inefficient and costly land use patterns, but it would create challenges for providing essential services, adversely impact natural systems, increase conflict with agricultural businesses, and impact the feasibility of future mineral extraction operations.</p> <p>The Official Plan considered urban expansion candidate areas, some of which posed challenges due to the presence of existing country lot subdivisions. Permitting future rural subdivisions will hamper potential future urban expansion areas and <u>decrease</u> the amount of housing those lands could have provided.</p> <p>Rural multi-lot creation is inconsistent with the proposed direction in Chapter 2.1, Chapter 2.3 and Chapter 2.8. This will create a conflict between existing and future residents and will make planning for <i>infrastructure</i> very difficult, fragmented, and costly. This would create conflict between agricultural and residential traffic (i.e., tractors slowing impacting residential traffic). The introduction of additional residential <i>development</i> may hamper the expansion of agricultural operations and negatively impact a municipality’s ability to expand the urban boundary in an orderly and logical way.</p> <p>The City does not support the policy change regarding multi-lot residential <i>developments on rural lands</i>, which will introduce significant complexity to the City’s long-term planning of <i>infrastructure</i>. The City strongly recommends the Province withdraw this proposed change to policy, which will decrease the number of future homes on these lands, and create many negative impacts for municipalities.</p>
	<b>2.8 Employment</b>	
22	<p><b>2.8.1 Supporting a Modern Economy</b></p> <p>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 mixed-use areas where <i>frequent transit service</i> is available, outside of <i>employment areas</i>.</p>	<p><b>Staff analysis</b></p> <p>This proposed change 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> <p><b>Recommendations to the Province</b></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 recommends that the policy be re-worded to “<b>Small-scale</b> industrial, manufacturing and warehousing uses [...]”.</p>

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23	3. 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 diverse mix of land uses, including residential, employment, <i>public service facilities</i> and other <i>institutional uses</i> shall be permitted to support the achievement of <i>complete communities</i> .	<p><b>Staff analysis</b></p> <p>The City of Ottawa recognizes the importance for many municipalities to co-locate residential uses with commercial services to create more mixed-use communities. The City of Ottawa’s Official Plan takes that approach and directs compatible commercial uses to integrate with residential uses while preserving lands for industrial and logistics uses. Ottawa’s Official Plan uses a three-tier approach for its employment uses, the most restrictive tier (Industrial and Logistics designation) meets the proposed definition of <i>employment areas</i> and allows for heavy and noxious uses, with the second tier (Mixed Industrial designation) allowing for a diversity of light industrial and sensitive <i>institutional uses</i> that rely on lower rents by prohibiting residential and large-scale retail, and the third tier are our <i>strategic growth areas</i> (Hubs, Corridors, Neighbourhoods, and Special Districts) that allow for both residential, office, and commercial uses.</p>
24	4. Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 2.8.1.3 except for purposes of public health and safety.	<p>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>.</p> <p>The Mixed Industrial designation fits the description of employment lands outside of <i>employment areas</i>, as described in the proposed policy, but does so while explicitly prohibiting residential uses. While not <i>employment areas</i>, lands designated as Mixed Industrial preserve land for a broader mix of non-residential uses, such as smaller-scale office up to 4 storeys, light manufacturing, warehousing, trades/contractors, telecommunications broadcasting, and similar businesses with needs for moderate indoor or outdoor space. Some community-based uses are also located in these areas such as places of worship, indoor recreational uses, and stand-alone licensed child care centres. The latter uses typically adapt and reuse older vacant buildings that are less suited for modern-day warehousing and offer a large amount of floor space with a rent that is more affordable relative to commercial areas outside of Mixed Industrial areas. Mixed Industrial areas are not considered <i>employment areas</i> due to the presence of these latter <i>sensitive land uses</i> that are incompatible with defined employment uses. However, the other non-residential uses and businesses also need locations with affordable rents, which Mixed Industrial areas provide due to the lack of residential and large-scale retail permissions.</p> <p>While some industrial uses may be able to locate on lands that permit residential uses if compatible (i.e., Hubs, Corridors, and Neighbourhoods) they would likely not be able to afford the significantly higher land values in these areas, which is why the Mixed Industrial designation does not permit uses that would increase land values, being residential and large-scale retail. These businesses are currently part of <i>complete communities</i>. Residential permissions in these locations will undermine <i>complete communities</i> by not providing locations with the adequate conditions for such businesses to locate. Municipalities and communities are in the best position to determine how land use permissions contribute to <i>complete communities</i> in their local contexts.</p> <p>The proposed addition of a residential use 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. The proposed policy would also</p>

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		<p>create conflicts for existing uses that generate off-site impacts when there were previously none by virtue of the land use permissions that limited speculation of the real estate market. Existing light manufacturing, shipping, storage, warehousing and construction-related uses generate truck and heavy vehicle traffic at all times of the day, presenting noise and air quality concerns that typically generate complaints from residential uses.</p> <p>Light industrial sites are often large enough that if they are redeveloped for residential uses, they likely would meet the minimum threshold for parkland dedication (min. 4,000 sq.m). There are major health and safety concerns with locating parks in proximity to heavy-vehicle traffic, especially for vulnerable populations.</p> <p>The desire to create additional permissions for housing will have unintended consequences on existing and future businesses and the dedication of future parks in former employment areas that are transitioning but still have significant industrial-related uses.</p> <p><b>Recommendations to the Province</b></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 <b>diversity of uses may</b> be permitted to support the achievement of a <b>healthy local economy</b>”. This will enable municipalities to consider the range of permissions that are appropriate for their context.</p> <p>The City of Ottawa recommends deleting 2.8.1 policy 4) to protect existing and future businesses from higher rents and land values due to unintended consequences of real estate market speculation. The deletion of this policy allows municipalities to determine how to achieve their <i>complete communities</i> rather than a one-size approach across the province, which may undermine achieving <i>complete communities</i> in their local contexts.</p>
25	<p><b>2.8.2 Employment Areas</b></p> <p>2. 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"> <li>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;</li> <li>b) prohibiting residential uses, commercial uses, <i>public service facilities</i> and other <i>institutional uses</i>;</li> <li>c) prohibiting retail and office uses that are not associated with the primary employment use;</li> <li>d) prohibiting other <i>sensitive land uses</i> that are not ancillary to the primary employment use; and</li> </ul>	<p><b>Staff analysis</b></p> <p>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 the Industrial and Logistics 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><b>Recommendations to the Province</b></p> <p>The City 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, 5) vs 2.8.2 2)(c).</p>



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	e) including an appropriate transition to adjacent non- <i>employment areas</i> to ensure land use compatibility.	<p>2.8.2, 2)(c) prohibits office uses that are not associated with the primary employment use. However, 2.8.1, 5) 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 recommends that 2.8.2, 2)(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>, 2.8.2, 2)(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.</p>
26	<p>4. Planning authorities may remove lands from <i>employment areas</i> only where it has been demonstrated that:</p> <p>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;</p> <p>b) the proposed uses would not negatively impact the overall viability of the <i>employment area</i> by:</p> <ol style="list-style-type: none"> <li>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; and</li> <li>2. maintaining access to <i>major goods movement facilities</i> and <i>corridors</i>;</li> </ol> <p>c) existing or planned <i>infrastructure</i> and <i>public service facilities</i> are available to accommodate the proposed uses.</p>	<p><b>Staff analysis</b></p> <p>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 that a site specific conversion cannot effectively mitigate, particularly with the proposed wording of 2.8.2, policy 4) b) that allows for conditions 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 are trying to purchase land that is large enough and cost effective to accommodate their employment/industrial use.</p>

Row no.	Portion of the PPS <a href="#">ERO – 019-6813</a> <i>Italicized = defined term in the proposed PPS</i>	Staff analysis and recommendations to the Province <b>Bold = language proposed to be added</b>
		<p>Policy 2.8.2, 4)(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><b>Recommendations to the Province</b> The City recommends retaining the current need for a comprehensive review to evaluate the removal of lands from <i>employment areas</i>.</p> <p>The City recommends 2.8.2, 4)(b)(1) be deleted as it contradicts the intent of 2.8.2, 4)(b) and that 2.8.2, 4)(b)(2) be renumbered accordingly as a sub-policy of 2.8.2, 4). Policy 2.8.2, 4)(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>
	<b>2.9 Energy Conservation, Air Quality and Climate Change</b>	
27	<p>1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the <i>impacts of a changing climate</i> through approaches that:</p> <ul style="list-style-type: none"> <li>a) support the achievement of compact, <i>transit-supportive</i>, and <i>complete communities</i>;</li> <li>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>;</li> <li>c) support energy conservation and efficiency;</li> <li>d) promote <i>green infrastructure</i>, <i>low impact development</i>, and <i>active transportation</i>, protect the environment and improve air quality; and</li> <li>e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the <i>impacts of a changing climate</i>.</li> </ul>	<p><b>Staff analysis</b></p> <p>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.</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>

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		<p><b>Recommendations to the Province</b></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> <p>The City of Ottawa 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 of Ottawa 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. <a href="#">Ontario’s ambient air quality contaminants</a> 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 strongly recommends that the Province makes the following modifications to Chapter 2.9:  “1. Planning authorities shall plan to reduce greenhouse gas emissions, <b>improve air quality</b>, and prepare for the <i>impacts of a changing climate</i> through approaches that:  [...]  c) <b>advance sustainable design which maximizes</b> energy efficiency and conservation;  d) <b>seek opportunities for</b> <i>green infrastructure, low impact development, and active transportation</i>, protect the environment and improve air quality;  e) <b>incorporate innovative design features</b> that reduce greenhouse gas emissions and build community resilience to the <i>impacts of a changing climate</i>.”</p>
	<b>Chapter 3: Infrastructure and Facilities</b>	
	<b>3.1 General Policies for infrastructure and Public Service Facilities</b>	
28	<p>1. <i>Infrastructure and public service facilities</i> shall be provided in an efficient manner while accommodating projected needs.</p> <p>Planning for <i>infrastructure and public service facilities</i> shall be coordinated and integrated with land use planning and growth management so that they:</p>	<p><b>Staff analysis</b></p> <p>The more permissive policies regarding expansion of <i>settlement areas</i> and rural development contradict the objective of providing <i>infrastructure and 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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	<ul style="list-style-type: none"> <li>a) are financially viable over their life cycle, which may be demonstrated through asset management planning;</li> <li>b) leverage the capacity of development proponents, where appropriate; and</li> <li>c) are available to meet current and projected needs.</li> </ul>	<p><b><u>Recommendations to the Province</u></b> To provide <i>infrastructure</i> in the most efficient manner, the City recommends directing growth to <i>settlement areas</i> and continuing the comprehensive review approach to evaluate the expansion of <i>settlement areas</i>.</p>
29	6. 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><b><u>Staff analysis</u></b> 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><b><u>Recommendations to the Province</u></b> 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>
30	<b>3.2 Transportation Systems</b>	<p><b><u>Staff analysis</u></b> 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><b><u>Recommendations to the Province</u></b> The City recommends that the language of 1.6.7, 4) of the current 2020 PPS be retained in Chapter 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>
	<b>3.5 Land Use Compatibility</b>	
31	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><b><u>Staff analysis</u></b> Policy 1.2.6, 2) of the current 2020 PPS are proposed to be re-located to Chapter 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>

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		<p><b><u>Recommendations to the Province</u></b> 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 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 ensure the long-term operational and economic viability in accordance with provincial guidelines, standards and procedures, <b>and the Ontario’s Ambient Air Quality Criteria.</b>”</p>
	<b>3.6 Sewage, Water and Stormwater</b>	
<b>33</b>	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><b><u>Staff analysis</u></b> 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><b><u>Recommendations to the Province</u></b> The City 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>
<b>34</b>	8. Planning for stormwater management shall: 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; b) minimize, or, where possible, prevent increase in 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;	<p><b><u>Staff analysis</u></b> 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> <p><b><u>Recommendations to the Province</u></b> The City of Ottawa is supportive of the direction provided by this policy.</p>

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	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.	
	<b>3.8 Energy Supply</b>	
<b>35</b>	1. Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and <i>renewable energy systems</i> and <i>alternative energy systems</i> , to accommodate current and projected needs.	<p><b>Staff analysis</b>            There are no references to “energy storage”, except for the definition for <i>on-farm diversified use</i>. Given the increased demand of electricity and the retiring supply from existing generating stations, the Independent Energy System Operator is looking to procure significant amounts of battery storage capacity to help offset periods of peak demand by storing power during off-peak times.</p> <p><b>Recommendations to the Province</b>            The City of Ottawa recommends that a reference to “energy storage” be added to this policy. Energy storage will play a role in planning for Ottawa’s future energy supplies, especially in response to the increasing demand for electricity.</p>
	<b>3.9 Public Spaces, Recreation, Parks, Trails and Open Space</b>	
<b>36</b>	1. Healthy, active, and inclusive communities should be promoted by: <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>c) providing opportunities for public access to shorelines;</li> <li>and d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.</li> </ul>	<p><b>Staff analysis</b>            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> <p><b>Recommendations to the Province</b>            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) needs to be amended to also include “<b>healthy and resilient</b>” or “<b>healthy, active, and inclusive</b>” 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>

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	<b>Chapter 4: Wise Use and Management of Resources</b>	
	<b>4.2 Water</b>	
37	<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"> <li>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;</li> <li>b) minimizing potential <i>negative impacts</i>, including cross-jurisdictional and cross-watershed impacts;</li> <li>c) identifying <i>water resource systems</i>;</li> <li>d) maintaining linkages and functions of <i>water resource systems</i>;</li> <li>e) implementing necessary restrictions on development and <i>site alternation</i> to: <ul style="list-style-type: none"> <li>1. protect drinking water supplies and <i>designated vulnerable areas</i>; and</li> <li>2. protect, improve or restore <i>vulnerable</i> surface and ground water and their <i>hydrologic functions</i>;</li> </ul> </li> <li>f) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and</li> <li>g) ensuring consideration of environmental lake capacity, where applicable.</li> </ul>	<p><b><u>Staff analysis</u></b> 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><b><u>Recommendations to the Province</u></b> The City of Ottawa is supportive of the direction provided by this policy.</p>
38	<p>3. Municipalities are encouraged to undertake <i>watershed planning</i> to inform planning for <i>sewage and water services</i> and stormwater management, including <i>low impact development</i>, and the protection, improvement or restoration of the <i>quality and quantity of water</i>.</p>	<p><b><u>Staff analysis</u></b> 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><b><u>Recommendations to the Province</u></b> The City of Ottawa is supportive of the direction provided by this policy.</p>
	<b>4.3 Agriculture</b>	
39	<p><b>4.3.2 Permitted Uses</b></p> <p>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>	<p><b><u>Staff analysis</u></b> The proposed policies allow 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>



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40	<p>5. Subordinate to the principal dwelling, up to two additional residential units may be permitted in <i>prime agricultural areas</i>, provided that:</p> <ul style="list-style-type: none"> <li>a) any additional residential units are within, attached to, or in close proximity to the principal dwelling;</li> <li>b) any additional residential unit complies with the <i>minimum distance separation formulae</i>;</li> <li>c) any additional residential unit is compatible with, and would not hinder, surrounding agricultural operations; and</li> <li>d) appropriate <i>sewage</i> and <i>water services</i> will be provided.</li> </ul> <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>	<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> <p><b>Recommendations to the Province</b></p> <p>The proposed policies have the potential of reducing a farm’s ability to expand its operations in proximity to a residential use, which will hinder the local agriculture economy and regional food security.</p> <p>The City of Ottawa recommends that any permitted residential units be restricted to the principal dwelling and farm labour accommodations.</p>
41	<p><b>4.3.3 Lot Creation and Lot Adjustments</b></p> <p>1. Residential lot creation in <i>prime agricultural areas</i> is only permitted in accordance with provincial guidance for:</p> <ul style="list-style-type: none"> <li>a) new residential lots created from a lot or parcel of land that existed on January 1, 2023, provided that: <ul style="list-style-type: none"> <li>1. agriculture is the principal use of the existing lot or parcel of land;</li> <li>2. the total number of lots created from a lot or parcel of land as it existed on January 1, 2023 does not exceed three;</li> <li>3. any residential use is compatible with, and would not hinder, surrounding agricultural operations; and</li> <li>4. any new lot: <ul style="list-style-type: none"> <li>i. is located outside of a <i>specialty crop area</i>;</li> <li>ii. complies with the <i>minimum distance separation formulae</i>;</li> <li>iii. will be limited to the minimum size needed to accommodate the use while still ensuring appropriate <i>sewage</i> and <i>water services</i>;</li> <li>iv. has existing access on a public road, with appropriate frontage for ingress and egress; and</li> <li>v. is adjacent to existing non-agricultural land uses or consists primarily of lower-priority agricultural lands.</li> </ul> </li> </ul> </li> </ul>	<p><b>Staff analysis</b></p> <p>The proposed policy allows for the creation of a residential lot in <i>prime agricultural areas</i> via Consent to Sever. Any application seeking to sever the property and create three new lots will still be required to assess the conditions listed in policy 4.3.3, 1)(a)4)(i – v). Therefore, not every property designated as Agricultural Resource Areas (i.e. <i>prime agricultural areas</i>) will be permitted to be severed into three lots, however, the condition of sub-policy 4)(v) is vague and will be difficult to interpret consistently, since no threshold is provided. The City should anticipate an increase in Consent to Sever applications in the Rural Transect.</p> <p>The City’s Official Plan currently allows for the severance of surplus farm dwellings on Agricultural Resource Area lands. An accessory or secondary dwelling to the principal residence may be permitted.</p> <p>In addition to limiting the ability for farms to expand, increasing the number of residential lots in <i>prime agricultural areas</i> results in conflicts between land uses, fragments farmland, and encourages speculative investment, which then raises the cost of farmland.</p> <p>Proposed policy 4.3.3, 2) directs that an Official Plan and Zoning By-law cannot be more restrictive than the PPS, meaning that the City would be required to amend the Official Plan to allow for the creation of three additional lots in Agricultural Resource Areas. Staff have not yet completed a site-by-site analysis of how the proposed restrictions of sub-policy 1)(a)4)(i – v) would apply to its Agricultural Resource Area lands. These comments were based solely on the proposed language, it is not yet clear how many properties will be impacted by the proposed criteria.</p>

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	<p>b) a <i>residence surplus to an agricultural operation</i> as a result of farm consolidation, provided that:</p> <ol style="list-style-type: none"> <li>1. the new lot will be limited to a minimum size needed to accommodate the use while still ensuring appropriate <i>sewage and water services</i>; and</li> <li>2. the planning authority ensures that new residential dwellings 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.</li> </ol>	<p><b><u>Recommendations to the Province</u></b> Proposed policy 4.3.3.1(a)4(v) refers to “consists of primarily of lower-priority agricultural lands”. The City of Ottawa requests clarity on how the Province will define “primarily” and “lower-priority”. The City would also like clarity whether sub-policy (v) would apply solely to the adjacent lands or if it includes the subject site.</p> <p>The City strongly recommends that proposed policies 4.3.3, 1) and 2) be removed in their entirety and that the language in section 2.3.4 of the current PPS, which limits lot creation and lot adjustments in <i>prime agricultural areas</i>, be retained.</p> <p>Ottawa has over 1,000 active farms that contribute to over 5% of the city’s employment. Municipalities should have the opportunity to protect their local economy and the livelihood of their labour force.</p>
42	2. Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 4.3.3.1 (a) except to address public health or safety concerns.	
43	<p><b>4.3.5 Non-Agricultural Uses in Prime Agricultural Areas</b></p> <p>2. Impacts from any new or expanding non-agricultural uses on surrounding agricultural lands and operations 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>	<p><b><u>Staff analysis</u></b> The City 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><b><u>Recommendations to the Province</u></b> N/A</p>
	<b>4.6 Cultural Heritage and Archaeology</b>	
44	1. <i>Protected heritage property</i> , which may contain <i>built heritage resources</i> or <i>cultural heritage landscapes</i> , shall be conserved.	<p><b><u>Staff analysis</u></b> 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>

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		<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><b><u>Recommendations to the Province</u></b> 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>
45	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 <i>conserved</i> .	<p><b><u>Staff analysis</u></b> 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> <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><b><u>Recommendations to the Province</u></b> 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 recommends that the Province revise the wording of this policy to clarify its application to Heritage Conservation Districts or landscapes.</p>

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	<b>Chapter 5: Protecting Public Health and Safety</b>	
46		<p><b>Staff analysis</b> 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><b>Recommendations to the Province</b> 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-amble 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 <b>human hazards</b>, including the risks that may be associated with the <i>impacts of a changing climate.</i>”</p>
47	<p><b>5.1 General Policies for Natural and Human-Made Hazards</b> 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 damage, and not create new or aggravate existing hazards.</p>	<p><b>Staff analysis</b> 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> <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><b>Recommendations to the Province</b> 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 <del>an unacceptable risk</del> <b>a public health or safety risk, as defined by the <i>Health Promotion and Prevention Act</i></b>, or of property damage, and not create new or aggravate existing hazards.”</p>
	<b>5.2 Natural Hazards</b>	
48	1. Planning authorities shall identify <i>hazardous lands</i> and <i>hazardous sites</i> and manage development in these areas, in accordance with provincial guidance.	<p><b>Staff analysis</b> 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><b>Recommendations to the Province</b> 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>

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	<b>Chapter 7: Definitions</b>	
49	<b>Complete communities:</b> 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, 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.	<p><b>Staff analysis</b> The characteristics of <i>complete communities</i> also needs to be “healthy and resilient” or “healthy, active, and inclusive”.</p> <p><b>Recommendations to the Province</b> The City recommends that the definition for <i>complete communities</i> be modified as follows: “means places such as <b>healthy and resilient</b> mixed-use neighbourhoods [...]” or “means places such as <b>healthy, active, and inclusive</b> 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 Chapter 3.9.</p>
50	<b>Proposed definition:</b> Energy Storage	<p><b>Staff analysis</b> There is no definition of “Energy storage” in the PPS, yet it is noted that “battery storage” was added to the definition of <i>on-farm diversified use</i> and “compressed air energy storage” was added to the definition of <i>petroleum resources</i> and <i>petroleum resource operations</i>. While there are existing definitions for <i>alternative energy generation</i> and <i>renewable energy generation</i>, no definition exists for energy storage which is not the same as generation. Energy storage is important for ensuring a continuous supply of electricity can be supplied to the grid, especially in the case of renewable sources of energy which are not continuously available.</p> <p><b>Recommendations to the Province</b> The City of Ottawa recommends that a new definition be added to the PPS as follows: <b>“Energy storage:</b> means the capture of 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, compressed air storage and battery storage”.</p> <p>This new definition will distinguish between the storage of energy in contrast to the generation of energy, as defined in <i>alternative energy generation</i> and <i>renewable energy generation</i>. Energy storage is important for ensuring a continuous supply of electricity to the grid.</p> <p>It is also recommended that “compressed air energy storage” be removed from the definition of <i>petroleum resources</i> and <i>petroleum resource operations</i> and moved to the new definition of energy storage.</p>
51	<b>Higher order transit:</b> 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	<p><b>Staff analysis</b> 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>.</p>

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	or regional inter-city rail), light rail, and buses in dedicated rights-of-way.	<b><u>Recommendations to the Province</u></b> N/A
52	<b>Housing options:</b> 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 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.	<b><u>Staff analysis</u></b> The proposed definition makes minor adjustments to include additional housing forms, but notably removes references to affordable housing.  <b><u>Recommendations to the Province</u></b> In addition to retaining the requirements for a municipality to provide a minimum affordable housing target, the City recommends including references to affordable housing in the proposed definition for <i>housing options</i> .
53	<b>Large and fast-growing municipalities:</b> means municipalities identified in Schedule 1.	<b><u>Staff analysis</u></b> 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> .  <b><u>Recommendations to the Province</u></b> The City of Ottawa is supportive of the proposed definition and is supportive of being identified as a <i>large and fast-growing municipality</i> .
54	<b>Deletion of Low and moderate income households</b>	<b><u>Staff analysis</u></b> The definition for <i>low and moderate income households</i> is proposed to be removed from the PPS.  <b><u>Recommendations to the Province</u></b> The City recommends that the definition for <i>low and moderate income households</i> of the current 2020 PPS be retained since no other provincial legislation defines a low or moderate income. Planning authorities risk no longer being coordinated in their understanding of a low and moderate income, possibly creating a disparity across the province around how resources should be equitably distributed to provide for affordable housing.
55	<b>Major transit station area:</b> means the area including and around any existing or planned <i>higher order transit</i> station 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	<b><u>Staff analysis</u></b> 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.

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	defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.	<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><b><u>Recommendations to the Province</u></b> Proposed policy 2.4.2, 1) and the definition for <i>major transit station area</i> do not appear to be consistent. The proposed definition in Chapter 7 for “<i>Major Transit Station Areas</i>” states “<u>generally</u> are defined as the area within an <u>approximate 500 to 800 metre</u> radius of a transit station [...]”, whereas proposed policy 2.4.2, 1). states that an <i>MTSA</i>’s “delineation <u>shall define</u> an area <u>within a</u> 500 to 800 metre radius [...]”, implying a maximum radius of 800 metres. Please clarify the language on whether there is flexibility on the distances between the policy and the definition The City of Ottawa is supportive of the proposed direction provided that <i>MTSAs</i> are not restricted to a maximum 800-metre radius.</p> <p>The City recommends the following adjustment: “The delineation shall define an area <b>generally</b> within a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.” A flexible approach would support a number of <i>MTSAs</i> within Ottawa that exceed an 800-metre radius.</p>
56	<b>Surface water feature:</b> 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.	<p><b><u>Staff analysis</u></b> 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.</p> <p><b><u>Recommendations to the Province</u></b> N/A</p>
57	<b>Watershed planning:</b> 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 for the assessment of cumulative, cross-jurisdictional, and cross- <i>watershed</i> impacts. It may inform the identification of <i>water resource systems</i> .	<p><b><u>Staff analysis</u></b> <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.</p> <p><b><u>Recommendations to the Province</u></b> For clarity, the City of Ottawa recommends that the Province consider revising the definition to recognize that <i>watershed planning</i> may occur at different spatial scales and may include <i>subwatersheds</i> and <i>catchment areas</i>. Consider recognizing the concept of <i>subwatershed</i> planning for municipalities situated within portions of large <i>watersheds</i>. Ottawa has several large river systems that extend far outside our boundaries and our planning is frequently informed by <i>subwatershed</i> plans instead of (or as well as) full-scale watershed plans.</p>