

Staff Analysis and Comments Table

PPS Section	Observations	City Comment
Part I: Preamble	<ul style="list-style-type: none"> • Expanded to include what is Policy in the 2014 PPS (Policies 4.7, 4.8, 4.10, 4.11, 4.13) <ul style="list-style-type: none"> ○ References importance of Municipal Official Plans and Zoning and Development Permit By-laws for implementation of the PPS ○ References other approval legislation to be integrated, such as the Environmental Assessment Act. 	<ul style="list-style-type: none"> • The City has no concern
Part II: Legislative Authority	<ul style="list-style-type: none"> • Expanded to include what is part of Policy 4.2 in the 2014 PPS. <ul style="list-style-type: none"> ○ References “shall be consistent with” this Provincial Policy Statement. 	<ul style="list-style-type: none"> • The City has no concern
Part III: How to Read the Provincial Policy Statement	<ul style="list-style-type: none"> • Expanded to provide clarity <ul style="list-style-type: none"> ○ References same, similar, related, or overlapping matters of other provincial plans • Expanded to include what is part of Policy 4.9 in the 2014 PPS. <ul style="list-style-type: none"> ○ References representing minimum standards. 	<ul style="list-style-type: none"> • The City has no concern
Part IV: Vision for Ontario’s Land Use Planning System	<ul style="list-style-type: none"> • Clarifies and expands on relationship with Indigenous communities • Adds language regarding housing options responding to current and future needs • Adds language regarding impacts of a changing climate • Speaks to recreational opportunities within natural heritage resources 	<ul style="list-style-type: none"> • The City supports the changes
Part V: Policies	<p>General</p> <ul style="list-style-type: none"> • Overall the policies, with respect to climate change adaptation and resiliency, have been strengthened related to preparing for climate change impacts • Overall the policies provide emphasis on energy conservation and energy supply • Overall the policies for natural heritage have been strengthened 	<p>General Comments</p> <p>The City supports:</p> <ul style="list-style-type: none"> • The City supports the encouragement of development of an increased mix and supply of housing and requiring alignment with Housing and Homelessness Plans. • The City is pleased with the Provinces response to our request, and supports the revised time horizon, from 20 years to 25 years, for sufficient land to be made available to accommodate an appropriate range and mix of land uses to meet projected needs.

	<ul style="list-style-type: none"> • No longer treating “electricity generation facilities and transmission and distribution” as separate from “infrastructure”. • Changed “shall” to “should” for <ul style="list-style-type: none"> ○ New development to have a compact form ○ Establishing and implementing phasing policies for intensification ○ Efficient use of existing and planned infrastructure (including transportation demand management strategies) • Changed “should” to “shall” for <ul style="list-style-type: none"> ○ Major facilities and sensitive land uses to be planned and developed to be separated or mitigated from odour, noise, etc. • Added language regarding consideration of “housing policy”, “provincial guidelines, standards and procedures”, and “Service Manager Housing and Homelessness plans”. • Added language to reference “market-based needs” regarding housing • Adjust from referencing “housing types” or “housing forms” to “housing options” • Adjust from referencing “second units” to “additional residential units” 	<ul style="list-style-type: none"> • The City supports enhanced municipal engagement with Indigenous communities on land use planning to help inform decision-making, build relationships and address issues upfront in the approvals process and strengthening language from “encouraged to” to “shall engage” with Indigenous communities. • The City supports the stronger direction to prepare for the impacts of a changing climate and to mitigate risks to human health, safety, property and the environment. • The City supports the stronger direction to integrate land use planning with transit and infrastructure planning, including the additional policy regarding the co-location of linear infrastructure should be promoted, where appropriate. • The City supports the inclusion of policies to support the economy and jobs • The City supports the promotion of providing opportunities to support local food and to improve the agri-food network. • The City supports the clearer direction with respect to potential impacts on agricultural operations from the expansion of settlement areas. • However, consideration of the following policy suggestions is requested.
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.0 Building Strong Healthy Communities 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns 1.1.1</p> <ul style="list-style-type: none"> • expanded on kinds of appropriate housing types (including market-based, single detached, additional and multi-unit housing) to be accommodated and kinds of cost-effective development patterns (including transit-supportive and intensification). 	<p>1.0 Building Strong Healthy Communities 1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns 1.1.1 1.1.1 (b)</p> <ul style="list-style-type: none"> • The City recommends that, policy 1.1.1 (b), not be changed from how it is worded in the 2014 PPS. REASON: <ul style="list-style-type: none"> • “market-based”, planning authorities include a market-based approach as part of their land use accommodations. “Market-based” is not defined and will have a variety of interpretations on

	<p>1.1.2</p> <ul style="list-style-type: none"> • Changed time horizon from 20 years to 25 years for sufficient land to be made available to accommodate an appropriate range and mix of land uses to meet projected needs. <p>1.1.3 Settlement Areas</p>	<p>what constitutes being “market-based”. A definition for “market-based” at a Provincial level may be too prescriptive to how planning authorities conduct their accommodation needs within their contexts, particularly with significant variations among Ontario municipalities.</p> <ul style="list-style-type: none"> • If the proposed “market-based” wording continues to be included, then either a definition will be required; or some recognition that text should reflect anticipated market changes throughout the planning horizon. These changes will mostly likely be shaped by local demographics and economics. <p>REASON:</p> <ul style="list-style-type: none"> • “single-detached, additional residential units, multi-unit housing” specifically identifying these residential types is too prescriptive as not all planning authorities may be able to support some of these types, either currently or through their planning horizons. The original wording on “accommodating an appropriate range and mix of residential” already requires the consideration of the residential types specifically mentioned and their appropriate accommodation within the planning horizon. The inclusion of these specific types will lead to misinterpretation that they will all have to be accommodated for, regardless of the supporting demographic demand within a planning authority’s jurisdiction. • It is not clear to the City what the Province intended by the term “additional residential unit” and this should be deleted or defined <p>1.1.1 (i)</p> <ul style="list-style-type: none"> • The City recommends that policy 1.1.1 (i) be revised as follows: “preparing for the regional and local impacts of a changing climate and mitigating the risks to health, safety, property and the environment” <p>1.1.1 (j)</p> <ul style="list-style-type: none"> • The City recommends the addition of a new policy 1.1.1 (j), being: “promoting development and land use patterns that support energy conservation and efficiency and reduce greenhouse gas emissions” <p>1.1.3 Settlement Areas</p> <p>1.1.3.3</p>
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	<p>1.1.3.2</p> <ul style="list-style-type: none"> Added “prepare for impacts of a changing climate” as a criterion for land use patterns within settlement areas. <p>1.1.3.3</p> <ul style="list-style-type: none"> Added “transit-supportive development, accommodating a significant supply and range of housing options” for planning authorities to identify appropriate locations and opportunities for. <p>1.1.3.8</p> <ul style="list-style-type: none"> strengthens language regarding impacts from new or expanding settlement areas on agricultural operations. <p>1.1.3.9</p> <ul style="list-style-type: none"> allows adjustments to settlement areas without a comprehensive review when: <ul style="list-style-type: none"> a) there would be no net increase in land within the settlement area; b) the adjustment would support the municipality’s ability to meet intensification and redevelopment targets established by the municipality; c) prime agricultural areas are addressed in accordance with 1.1.3.8 (c), (d) and (e); and d) the settlement area to which lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands. 	<p>The City recommends that policy 1.1.3.3 be revised to also continue to support other opportunities for intensification and redevelopment, as follows: “Planning authorities shall identify appropriate locations and promote opportunities for transit supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including transit service areas, brownfield sites, and the availability of suitable existing or planning infrastructure and public service facilities required to accommodate projected needs. Development that is transit supportive shall also accommodate a significant supply and range of housing options and unit sizes.”</p> <p>REASON:</p> <ul style="list-style-type: none"> Revise the proposed wording so that opportunities for intensification are not only limited to transit-supportive development, as planning authorities have different transit service levels and there may be other appropriate locations for intensification opportunities that are not directly tied to transit. <p>1.1.3.8 (a)</p> <ul style="list-style-type: none"> 1.1.3.8 a Similar to the response to changes in 1.1.1 (b) above clarification is needed to how “market demand” is to be determined. Is this intended to respond to isolated or structural changes in market demand? <p>1.1.3.9</p> <ul style="list-style-type: none"> The City Generally supports new policy 1.1.3.9 but it is not clear how a “no net gain” boundary adjustment supports “<i>Intensification and redevelopment targets</i>” when adjustments would most likely result in a swap of land that constitutes new “<i>designated growth areas</i>”. There should also be a requirement to demonstrate a significant increase in the developability, serviceability or other benefits from including the new land in such a swap. This policy could be beneficial if it allowed municipalities to rationalize marginal quality employment lands that may be a legacy of very outdated plans or as a result of municipal amalgamations. To do so, this policy should be amended to include language that includes conversion of employment lands to other land uses outside of a comprehensive review.
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<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.2 Co-ordination</p> <p>1.2.1</p> <ul style="list-style-type: none"> • Policy 1.2.1 (h) connects the PPS policies with the Housing and Homelessness Plans <p>1.2.2</p> <ul style="list-style-type: none"> • strengthening language from “encouraged to” to “shall engage” with Indigenous communities. <p>1.2.6 Land Use Compatibility</p> <ul style="list-style-type: none"> • flexibility to allow Major Facilities and Sensitive land uses not to be separated from odour, noise, etc.; where avoidance is not possible when there are no reasonable alternatives and impacts can be minimized or mitigated. 	<p>1.2 Coordination</p> <p>1.2.1</p> <p>1.2.1 (d)</p> <ul style="list-style-type: none"> • The City recommends inserting “alternative energy system” into policy 1.2.1 (d) such that it reads as follows: “infrastructure, alternative energy system, multimodal transportation systems, public service facilities and waste management systems”. <p>1.2.6 Land Use Compatibility</p> <p>1.2.6.1</p> <ul style="list-style-type: none"> • The City recommends that policy 1.2.6.1 be revised as follows: “<i>Major facilities and sensitive land uses</i> shall be planned and developed to ensure they are appropriately designed, buffered and avoid, or if avoidance is not possible, minimize and separated to mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety (including from extreme heat, flooding or other effects of a changing climate), and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.3 Employment</p>	<p>1.3 Employment</p> <p>The City requests consideration of the following:</p> <ul style="list-style-type: none"> • The City recommends that the term “employment” be relabelled to wording that is closer to what the public understands employment to be, which are about jobs. • The City recommends that the term “employment areas” be relabelled closer to what the public understands employment areas to be, which are about traditional industrial subdivisions that includes manufacturing, and/or assembly, and/or warehousing, and/or outdoor storage, and/or freight supportive uses. <ul style="list-style-type: none"> ○ Office campuses do not need to be defined under Employment Areas similar to how retail and other commercial uses are not included within this definition.

	<p>1.3.1</p> <ul style="list-style-type: none"> Regarding promoting economic development and competitiveness, have added: “c) facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment” <p>1.3.2.2</p> <ul style="list-style-type: none"> Addition of policy that directs municipalities to assess employment areas at the time of OP review or update; and to provide for separation to industrial and manufacturing uses <p>1.3.2.3</p> <ul style="list-style-type: none"> Flexibility to allow residential and institutional uses that are ancillary and to provide transition to adjacent non-employment areas. 	<p>1.3.1</p> <ul style="list-style-type: none"> The City recommends that clarity be provided in Policy 1.3.1 (a), (b), (c) and (d), by referring to employment generically, as in all types of jobs. This policy should also give the municipality the option to use partial services only for these specific investment ready sites where it can be demonstrated that there will be no adverse impact on groundwater resources. For example, the City frequently sees where the only need for municipal water is for fire protection purposes in manufacturing operations, allowing businesses to avoid hundreds of thousands of dollars in costs for fire protection water storage. <p>1.3.2</p> <ul style="list-style-type: none"> The City recommends that this section and subsections refer to traditional industrial subdivisions and freight supportive uses with a clearer and more specific label than the current “employment areas”. <ul style="list-style-type: none"> Recommend removing “Employment Areas” from the new label completely. <p>1.3.2.1</p> <ul style="list-style-type: none"> The City recommends a policy addition to permit Major Office only within the relabelled Employment Areas that have existing or planned frequent transit service. <p>REASON:</p> <ul style="list-style-type: none"> To be consistent with Places to Grow. <p>1.3.2.3</p> <ul style="list-style-type: none"> The City recommends that for policy 1.3.2.3, that major retail uses also be prohibited within these areas. <p>REASON:</p> <ul style="list-style-type: none"> To be consistent with Places to Grow. The City recommends that for policy 1.3.2.3, that term “new” be included. <p>REASON:</p> <ul style="list-style-type: none"> so that transition policies only apply to new areas for industrial and freight supportive areas. A transition will not be possible for many of the existing areas.
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	<p>1.3.2.5</p> <ul style="list-style-type: none"> Flexibility to allow employment lands to be converted at time of Official Plan Review 	<p>1.3.2.5</p> <ul style="list-style-type: none"> The City recommends that for policy 1.3.2.5, remove the reference to a “regional economic development corporation. <p>REASON:</p> <ul style="list-style-type: none"> Ottawa’s employment spectrum is different from many of the planning authorities in the GTA and is significantly weighted towards government, technology, software, health and education services. As such, Ottawa’s regional economic development corporation has a mandate that focuses on start-up incubation and mentorship, acceleration for existing companies, global business attraction and local business retention, targeted sector development and commercialization. PPS defined “Employment Areas” planned for industrial and manufacturing are not part of their mandate.
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.4 Housing</p> <p>1.4.1</p> <ul style="list-style-type: none"> Changed time horizon from 10 years to 12 years for sufficient land to be made available to accommodate residential growth and option to have 5-year supply of residential units available through lands zoned for residential intensification and land in draft approved and registered plans. <p>1.4.3</p> <ul style="list-style-type: none"> For “Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based needs of current and future residents of the regional market area by:” added “e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations” New Policy 1.4.3 e) to support requiring transit-supportive development and prioritizing intensification, including potential for air rights development, proximity to transit, including corridors and stations 	<p>1.4 Housing</p> <ul style="list-style-type: none"> The City recommends strengthening Policies in 1.4 to require housing development to consider the impacts of a changing climate through adaptive building and site design, as per regional and local variations. <p>1.4.3</p> <ul style="list-style-type: none"> The City supports the changes to Section 1.4.3 subject to the following: The City recommends that, policy 1.4.3 be revised to remove the term “market-based” unless more detail as to how this is interpreted can be provided. <ul style="list-style-type: none"> See comment above for policy 1.1.1 The City requests clarification, regarding policy 1.4.3 (b), in terms of what the Province intended by the term “additional residential unit” and this should be deleted or defined.
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.5 Public Spaces, Recreation, Parks, Trails, and Open Space</p>	<p>1.5 Public Spaces, Recreation, Parks, Trails, and Open Space</p> <ul style="list-style-type: none"> The City recommends a new policy under 1.5.1:

		<ul style="list-style-type: none"> ○ “e) planning public streets, spaces and facilities to provide adequate shade and shelter to enable safe use in all future climate conditions”
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.6 Infrastructure and Public Service Facilities</p> <ul style="list-style-type: none"> • stronger language regarding changing climate • clarifying for hierarchy of servicing • clarifying language for stormwater management <p>1.6.8 Transportation and Infrastructure Corridors</p> <ul style="list-style-type: none"> • additional policy regarding the co-location of linear infrastructure should be promoted, where appropriate. 	<p>1.6 Infrastructure and Public Service Facilities</p> <p>1.6.6 Sewage, Water and Stormwater</p> <p>1.6.6.1</p> <ul style="list-style-type: none"> • The City recommends, for Policy 1.6.6.1 (a) that the term “direct”, as it existed for the 2014 PPS remain, as it promotes the efficient use and optimization of existing services prior to construction of new services. <p>1.6.6.5</p> <ul style="list-style-type: none"> • The City recommends Policy 1.6.6.5 be revised, to allow for partial servicing for existing development (either water or sewer, depending on sustainability considerations), to improve the affordability of conversion. • The City recommends that consideration be given to removing reference to “rural areas” as privately serviced enclaves may exist within urban areas due to a variety of reasons. <p>1.6.11 Energy Supply</p> <p>1.6.11.1</p> <ul style="list-style-type: none"> • The City recommends Policy 1.6.11.1 be revised as follows: Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, district energy, and renewable energy systems and alternative energy systems, to accommodate current and projected needs. Alternative energy systems may be considered only if renewable energy systems are not feasible.
<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.7 Long-Term Economic Prosperity</p> <ul style="list-style-type: none"> • added policy “b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;” to “1.7.1 Long-term economic prosperity should be supported by:” 	<p>1.7 Long Term Economic Prosperity</p> <p>1.7.1</p> <ul style="list-style-type: none"> • For Policy 1.7.1 the City recommends deleting the term “market-based”. Please see comments above for section 1.1.1 (b) 1.1.7(j) • The City recommends that for Policy 1.7.1 (j), should be rephrased to: promoting energy efficiency and conservation and renewable energy generation and providing opportunities for increased energy supply.

<p>Part V: Policies, Section 1.0 Building Strong Healthy Communities</p>	<p>1.8 Energy Conservation, Air Quality and Climate Change</p> <ul style="list-style-type: none"> added “encourage transit-supportive development and intensification to” to “improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion”. 	<p>1.8 Energy Conservation, Air Quality and Climate Change</p> <ul style="list-style-type: none"> The City recommends consideration be given to including a policy regarding the promotion of the adaptive reuse of existing buildings, structures and infrastructure, to take advantage of their embodied energy.
<p>Part V: Policies, Section 2.0 Wise Use and Management of Resources</p>	<p>2.1 Natural Heritage 2.1.10</p> <ul style="list-style-type: none"> Added policy 2.1.10 Municipalities may choose to manage wetlands not subject to policy 2.1.4 and 2.1.5, in accordance with guidelines developed by the Province. 	<p>2.1 Natural Heritage</p> <ul style="list-style-type: none"> The City has no concern
<p>Part V: Policies, Section 2.0 Wise Use and Management of Resources</p>	<p>2.2 Water 2.2.1</p> <ul style="list-style-type: none"> Expanded on policy 2.2.1, by adding “evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;” 	<p>2.2 Water</p> <ul style="list-style-type: none"> The City has no concern
<p>Part V: Policies, Section 2.0 Wise Use and Management of Resources</p>	<p>2.3 Agriculture 2.3.1 Prime agricultural areas shall be protected for long-term use for agriculture.</p> <ul style="list-style-type: none"> Added note: “Planning authorities are encouraged to use an agricultural system approach to maintain and enhance the geographic continuity of the agricultural land base and the functional and economic connections to the agri-food network.” <ul style="list-style-type: none"> See added definitions for “Agricultural System” & “Agri-food network” 	<p>2.3 Agriculture</p> <ul style="list-style-type: none"> Additional language on criteria to be permissive of secondary or interim uses on farms to permit farmers to earn supplementary incomes may be helpful. The City would also like further policy clarity that any municipal facility/use could be permitted in prime agricultural areas where it can be demonstrated that there is no reasonable alternative on lower quality lands.
<p>Part V: Policies, Section 2.0 Wise Use and Management of Resources</p>	<p>2.5 Mineral Aggregate Resources 2.5.2 Protection of Long-Term Resource Supply 2.5.2.2</p> <ul style="list-style-type: none"> Added note: “Outside of the Greenbelt Area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions.” <p>2.5.2.4</p>	<p>2.5 Mineral Aggregate Resources</p> <ul style="list-style-type: none"> The City has no concern

	<ul style="list-style-type: none"> Added note: “Where the Aggregate Resources Act applies, processes under the Aggregate Resources Act shall address the depth of extraction of new or existing mineral aggregate operations or their expansions.” 	
Part V: Policies, Section 2.0 Wise Use and Management of Resources	2.6 Cultural Heritage and Archaeology	2.6 Cultural Heritage and Archaeology <ul style="list-style-type: none"> The City has no concern
Part V: Policies, Section 3.0 Protecting Public Health and Safety	3.0 Protecting Public Health and Safety <ul style="list-style-type: none"> Added note: “(Note: policies in this section related to natural hazards are subject to ongoing review by the Province’s Special Advisor on flooding. Further changes may be considered as a result of this review)” 3.2 Human-Made Hazards 3.2.3 <ul style="list-style-type: none"> Added policy 3.2.3 - Planning authorities should support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.” 	3.0 Protecting Public Health and Safety 3.1 Natural Hazards <ul style="list-style-type: none"> The City recommends that policies be added to 3.1.3 to protect public health and safety from the negative impacts of extreme heat and the risks of potential future flooding, as a result of changing climate conditions.
Part V: Policies, 4.0 Implementation and Interpretation	4.0 Implementation and Interpretation <ul style="list-style-type: none"> Some of the policies that are in Section 4 of the 2014 PPS are now included in other non-policy Parts of the draft 2019 PPS <ul style="list-style-type: none"> 2014 PPS Policies 4.7, 4.8, 4.10, 4.11, 4.13 are in the 2019 PPS, Part I: Preamble. <ul style="list-style-type: none"> References importance of Municipal Official Plans and Zoning and Development Permit By-laws for implementation of the PPS References other approval legislation to be integrated, such as the Environmental Assessment Act 2014 PPS Policy 4.2 is in the 2019 PPS, Part II: Legislative Authority <ul style="list-style-type: none"> References “shall be consistent with” this Provincial Policy Statement. 	4.0 Implementation and Interpretation 4.7 <ul style="list-style-type: none"> The City recommends, that Policy 4.7 (a) specifically identify affordable housing applications as being fast tracked.

	<ul style="list-style-type: none"> ○ 2014 PPS Policy 4.9 is in the 2019 PPS, Part III: How to Read the Provincial Policy Statement ● 2019 PPS adds a new policy: “4.7 Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for local development by: <ul style="list-style-type: none"> a) identifying and fast-tracking priority applications which support housing and job-related growth and development; and b) reducing the time needed to process residential and priority applications to the extent practical.” 	
Part V: Policies, 5.0 Figures	No apparent changes	<ul style="list-style-type: none"> ● The City has no concerns
Part V: Policies, 6.0 Definitions	<p>New Definitions were added for:</p> <ul style="list-style-type: none"> ● Agricultural System ● Agri-food network ● Housing options ● Impacts of a changing climate <p>Simplified Definition</p> <ul style="list-style-type: none"> ● Habitat of endangered species and threatened species <p>Definitions were expanded upon for:</p> <ul style="list-style-type: none"> ● On-farm diversified uses ● Residential intensification 	<ul style="list-style-type: none"> ● The City recommends a revised definition for “alternative energy systems”, being: means a system that uses sources of energy or energy conversion processes to produce power, heat and/or cooling that very significantly reduces the amount of harmful emissions to the environment (air, earth and water) when compared to the lowest emitting conventional energy systems ● The City recommends that “district energy” be defined, in support of Policy 1.6.11.1 or that the definition for Alternative energy system be revised to include “district energy” systems. ● The City recommends that the term “employment areas” be relabelled in the title and as referenced in the policies in 1.3.2; and in Section 6.0. <ul style="list-style-type: none"> ○ To avoid confusion on areas that include jobs not included within the existing definition. ○ The definition should focus solely on manufacturing, warehousing, outside storage and freight supportive uses. Major offices should only be permitted as per the comment in Section 1.3.2.1. ● The City recommends that the definition for “Frequent Transit Service” be included and be the same definition as Places to Grow. ● For definition for “Housing Options”, it is not clear to the City what the Province intended by the term “additional residential unit” and this should be deleted or defined

		<ul style="list-style-type: none">• The City recommends that the definition for “Major Office” be included and be the same definition as Places to Grow.• The City recommends that the definition for “Major Retail” be included and be the same definition as Places to Grow.• The City recommends that references to a “Market-based” approach be removed. However, if the concept proceeds a definition should be included which would consider whether the market will change throughout the planning horizon and the resulting appropriate range and mix of housing throughout the planning horizon.• The City recommends a revised definition for Public service facilities, being “means land, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, municipal parks, recreation services and facilities, police and fire protection, health and educational programs, long-term care services, and cultural services. <i>Public service facilities</i> do not include <i>infrastructure.</i>”• The City recommends a revised definition for Renewable energy source, being: “means an energy source that is renewed by natural processes and includes wind, water, biomass, biogas, biofuel, solar, waste heat and geothermal energy and tidal forces.• The City recommends a revised definition for Renewable energy system, being: “means a system that generates electricity, fuel, heat and/or cooling from a renewable energy source.• For definition for “Residential Intensification”, it is not clear to the City what the Province intended by the term “additional residential unit” and this should be deleted or defined• The City recommends that the changes to the definition for “significant” regard to cultural heritage” be reconsidered.<ul style="list-style-type: none">○ The City notes that the definition no longer recognises local municipal approaches but defers to provincial or national and International Criteria. This change could impact the classification of heritage resources, identified by the City.
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