



# Corporate Report

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**DATE:** August 31, 2010

**TO:** Chair and Members of Planning and Development Committee  
Meeting Date: September 20, 2010

**FROM:** Edward R. Sajecki  
Commissioner of Planning and Building

**SUBJECT:** **Review of the Provincial Policy Statement 2005**

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**RECOMMENDATION:** That the report titled "Review of the Provincial Policy Statement 2005", dated August 31, 2010 from the Commissioner of Planning and Building, be received and forwarded, by the City Clerk, to the Ministry of Municipal Affairs and Housing.

**BACKGROUND:** The Ministry of Municipal Affairs and Housing, in conjunction with other land use planning ministries, is undertaking a five-year review of the Provincial Policy Statement, 2005 (PPS), as required under the *Planning Act*, and have requested input from municipalities on whether changes to the PPS are needed (see Appendix 1).

**COMMENTS:** **Introduction**

The PPS provides policy direction on matters of Provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the PPS sets the policy foundation for regulating the development and use of land.

The PPS provides for development while protecting resources of Provincial interest, public health and safety, and the quality of the natural environment. The PPS supports improved land use planning and management, which contributes to a more effective and efficient land use planning system.

The policies of the PPS are complemented by other Provincial plans, such as the Growth Plan, or by locally-generated policies regarding matters of municipal interest. Provincial plans and municipal official plans provide a framework for comprehensive, integrated and long-term planning that supports and integrates the principles of strong communities, a clean and healthy environment and economic growth, for the long term.

### **Legislative Authority**

The PPS is issued under the authority of Section 3 of the *Planning Act* and came into effect on March 1, 2005. It applies to all applications, matters or proceedings commenced on or after March 1, 2005.

In respect of the exercise of any authority that affects a planning matter, Section 3 of the *Planning Act* requires that decisions affecting planning matters “shall be consistent with” policy statements issued under the Act.

### **Comments**

Detailed comments on the PPS are attached as Appendix 2. The comments in Appendix 2 are in the order in which the policies appear in the PPS. Deletions are shown as strikeouts and additions are in ***bold italics and underline***. General comments on key policy areas are outlined below.

#### Vision (Part IV – Vision for Ontario’s Land Use Planning System)

The vision in the PPS speaks primarily to the physical and natural environment and, while these two elements are important, the new

PPS should provide clearer references to sustainability and sustainable development in the vision provide policy direction on climate change, and support for transit and active transportation as viable transportation choices. Further, the PPS, like the Growth Plan, should focus on “complete communities” where land use, urban design and active transportation are integrated to create walkable, vibrant and fully serviced communities.

#### “One Size Fits All”

The PPS uses a broad policy framework to guide municipalities in three distinct land use categories consisting of Settlement Areas, Rural Areas in Municipalities and Rural Areas in Territory Without Municipal Organization. While this “one size fits all” approach may be suitable to generalize development on a Provincial basis, it fails to recognize the issues and needs of municipalities in different growth phases, such as emerging areas, high growth urban areas and non-urban municipalities which undergo little growth. This would support and align with the intensification/redevelopment, and transportation policies in the Growth Plan and Regional Transportation Plan.

#### Consistency Between the PPS and Growth Plan

The review of the PPS should consider that official plans in the Greater Golden Horseshoe need to conform to the Growth Plan and be consistent with the PPS. In some areas, the policy direction between these two documents is not consistent or co-ordinated. For example, the PPS should be consistent with the Growth Plan with respect to “complete communities”, and when referring to “designated growth areas” and “designated greenfield areas” for areas where the built boundary has been defined. Another example is that the Growth Plan considers “major retail” as a non-employment use, while the PPS does not.

There are also inconsistencies in language. For example, the PPS uses the term “shall”, whereas the Growth Plan uses the term “will”. The Growth Plan refers to “forecasts”, whereas the PPS uses “projections”.

The term “public service facilities” is used in the PPS whereas the Growth Plan uses “community infrastructure”. The PPS should be reviewed to be consistent with the policies and language in the Growth Plan.

#### Intensification

The PPS places clear and repeated emphasis on intensification. While there is some acknowledgement allowed for accommodating existing building stock or areas, there is insufficient or inadequate attention given to respecting the character of established neighbourhoods and communities. This has resulted in an imbalance within the PPS, and has led to many development applications which seek intensification for the sake of intensification and maximization of financial yield from development sites. The result is inordinate pressure placed on municipalities to balance the appropriate location for intensification projects against the valid and well recognized planning principle of respecting existing character. Local neighbourhoods with a defined ambience are as much a vital part of a healthy and dynamic municipality as providing for a varied form of housing needs on a macro level. The PPS should explicitly recognize that the established character is worthy of respect and should be a significant factor when considering development applications.

#### Conversion of Employment Lands

The PPS provides support for municipal decision-making with respect to the preservation of employment lands and the process of, and test for, conversion of lands within employment areas. Regrettably, through various Ontario Municipal Board decisions, the application of the PPS has become complicated. Now, the onus rests on local municipalities in their official plans to determine what constitutes an employment use within an employment area. This creates an opportunity for the spirit and intent of the PPS to be frustrated where an applicant, or the OMB, determines to interpret an official plan that large scale retail commercial uses, e.g. big box retail, is contemplated for an employment area, and concludes a proposal to change a land

use within such an area to permit large scale retail commercial use does not constitute a conversion. It would be of great assistance for municipalities if the PPS were to provide clarity and greater guidance on this issue by, among other matters, clearly stating that major retail uses are not considered an employment use, and by providing a definition for major retail uses.

### Phasing

A key area missing in the PPS is provision for the adequate phasing of infrastructure and growth in a manner that supports responsible development. It is suggested that the PPS be revised to provide criteria to ensure local and regional municipalities have the appropriate level of infrastructure, including transit facilities, in place prior to development approvals. As an example, the draft Mississauga Official Plan contains the following:

*4.1.8 New development will not exceed the capacity of existing and planned engineering services, transit services and community infrastructure. Development proposals may be refused if existing or planned servicing and/or infrastructure are inadequate to support the additional population and employment growth that would be generated or be phased to coordinate with the provision of services and infrastructure.*

*4.1.9 The population and employment forecasts are premised on the adequacy of services and infrastructure to support growth in the appropriate locations. This includes the Mississauga Bus Rapid Transit corridor and **higher order transit** along Hurontario Street and Dundas Street. If satisfactory arrangements for the implementation of **higher order transit** currently being planned are not made, the population and employment forecasts may be reduced in accordance with the capacity of the transportation system.*

### Transportation

Section 1.6 of the PPS should be updated to reflect the new elements in the transportation system as suggested in the Regional Transportation Plan. This includes the concept of a multi-modal

approach to transportation planning, mobility hubs, consideration of transit as a priority for investment, and active transportation as viable transportation choices.

The Ministry of Transportation is preparing Provincial Transportation Policy Statements to guide the development of municipal Transportation Master Plans. Consideration should be given to integrating the Provincial Transportation Policy Statements into the PPS, which will support the integration of transportation and land use as per section 1.6.5.5 of the current PPS.

### Energy

The PPS, particularly Policies 1.7: Long-Term Economic Prosperity and 1.8: Energy and Air Quality, should be reviewed in light of Bill 150: *The Green Energy and Green Economy Act, 2009*.

Bill 150's essential focus is the expansion of the generation of electricity from renewable resources, and the strengthening of electricity system infrastructure to facilitate this type of expansion. As such, it is reasonable that municipalities would review their Official Plan and zoning by-laws to incorporate aspects of the Bill as those projects would affect the municipality.

An important aspect of Bill 150, however, is that the Bill gives authority to the Province over renewable energy projects and exempts these projects from zoning by-laws, the Official Plan and various other municipal by-laws. As there is centralized control, the Province remains the approval authority for Renewable Energy Projects. Further, with some exceptions, Renewable Energy Project's and generation facilities are exempt from PPS and provincial plans.

It may be helpful if the PPS could provide direction or clarify and refine these provisions to ensure consistency with Bill 150. It may also be useful to refine the definitions relating to energy in the PPS to include definitions that appear in Bill 150.

### Pressure on the Natural System

The Growth Plan directs growth to lands within the built boundary, which puts pressure on the natural system through intensification and redevelopment. There is a need to balance the growth directed by the

Growth Plan with the policies in the PPS protecting Natural Heritage. Balancing the competing policies in the PPS is a challenge as the document is to be considered in its entirety; consequently, implementation or interpretation policies should be provided in cases where there is a conflict in policies.

The PPS contains policies to protect Provincially significant natural features such as wetlands, areas of natural and scientific interest, and coastal wetlands. As the natural system is under increasing pressure, these policies should support and provide protection for any natural heritage system identified by a local or regional municipality, even though its features may not be of Provincial significance.

Further, these policies are “feature based” in that they individually address each natural feature, rather than treating the natural features as part of an overall natural system. This encourages consideration of impacts on the natural features on a site by site basis, rather than considering impacts on the natural feature as part of a natural system.

**STRATEGIC PLAN:**

Because municipal decisions and the Official Plan must be consistent with the PPS, the PPS is an important tool to assist the implementation the land use components of the Strategic Plan. The policy themes of the PPS advance the strategic pillars for change, which are:

- Move: Developing a Transit Oriented City
- Belong: Ensuring Youth, Older Adults and New Immigrants Thrive
- Connect: Complete Our Neighbourhoods
- Prosper: Cultivating Creative and Innovative Businesses
- Green: Living Green

**FINANCIAL IMPACT:** Not Applicable

**CONCLUSION:** The Province continues to provide guidance to regional and local municipalities in land use planning. The provision of an updated PPS, together with the Growth Plan and other provincial initiatives provides an important and necessary framework to guide planning in Ontario. A revised PPS will assist Mississauga with the implementation of the Strategic Plan, the new Official Plan and will also support other municipal initiatives such as green development standards, the Bus Rapid Transit (BRT) and Cycling Master Plan.

**ATTACHMENTS:** APPENDIX 1: Letter from Ministry of Municipal Affairs and Housing dated June 4, 2010 requesting comments on the review of the Provincial Policy Statement  
APPENDIX 2: Detailed Comments – Provincial Policy Statement 2005

*Original Signed By:*

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Edward R. Sajecki  
Commissioner of Planning and Building

*Prepared By: Ron Miller, Planner, Policy Planning*



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June 4, 2010

Dear Clerk:

**RE: Five Year Review of the Provincial Policy Statement, 2005**

The Ministry of Municipal Affairs and Housing, in conjunction with other land use planning ministries, is undertaking a review of the Provincial Policy Statement, 2005 (PPS), as required under the *Planning Act*. The main goal of the review is to assess the need for revisions to the PPS.

The PPS is the integrated, consolidated statement of all ministries' policies concerning land use for Ontario and it provides policy direction on matters of provincial interest related to land use planning and development. Municipal councils, planning boards and any other decision makers including the Ontario Municipal Board must ensure their decisions that affect planning matters are consistent with the PPS.

The PPS recognizes the complex inter-relationships among economic, environmental and social factors in planning. It provides direction on key issues such as: the efficient use and management of land and resources; long-term protection of the natural environment and water resources; the conservation of cultural heritage and archaeological resources; and the protection of public health and safety. Your municipality's input and perspectives on whether changes to the PPS are needed will assist the government in determining if the policies are providing appropriate direction and protecting broader provincial interests.

A PPS Review pamphlet containing background information on the land use planning system in Ontario including what the PPS is and how it is used; why the review is necessary; questions asking not only about what policies are working well but also whether some changes are needed; and information on how to provide comments is available online at [www.mah.gov.on.ca/Page7243.aspx](http://www.mah.gov.on.ca/Page7243.aspx). The PPS, 2005 can also be viewed online by visiting [www.mah.gov.on.ca/Page1485.aspx](http://www.mah.gov.on.ca/Page1485.aspx).

Please provide your municipality's feedback on the questions contained in the pamphlet by August 31, 2010.

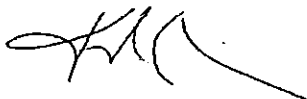
Further information about the PPS Review is available online at [www.ontario.ca/PPS](http://www.ontario.ca/PPS).

Information regarding the review of the PPS is also posted on the Environmental Bill of Rights Environmental Registry at [www.ebr.gov.on.ca](http://www.ebr.gov.on.ca).

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If you have any questions, please contact Kyle MacIntyre, Manager (A), Provincial Planning Policy Branch at 416-585-6014.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Petersen', with a long horizontal stroke extending to the right.

Ken Petersen  
Director (A)  
Provincial Planning Policy Branch

**Detailed Comments - Provincial Policy Statement (PPS) 2005**

Policy	Comment	No.	Recommendation
<b>1.0 Building Strong Communities</b>			
<b>1.1 Managing and Directing Land Use To Achieve Efficient Development and Land Use Patterns</b>			
<b>1.1.3 Settlement Areas</b>			
<p>1.1.3.2: Land use patterns within <i>settlement areas</i> shall be based on:</p> <p>(a) densities and a mix of land uses which:</p> <ol style="list-style-type: none"> <li>1. efficiently use land and resources;</li> <li>2. are appropriate for, and efficiently use, the <i>infrastructure</i> and <i>public service facilities</i> which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; and</li> <li>3. minimize negative impacts to air quality and climate change, and promote energy efficiency in accordance with policy 1.8;</li> </ol>	<p>Land use patterns and densities should be tied to the promotion of transit and active transportation as alternatives to automobiles. An additional point should be added to this section to encourage use of these alternative forms of transportation.</p>	<p>1.</p>	<p>That 1.1.3.2 (a) of the PPS be revised by adding:</p> <p><b><u>“4. <i>supporting transit use and active transportation as viable transportation choices.</i>”</u></b></p>

Policy	Comment	No.	Recommendation
<p>(b) a range of uses and opportunities for <i>intensification</i> and <i>redevelopment</i> in accordance with the criteria in policy 1.1.3.3.</p>	<p>Two additional criteria for land use patterns in this section should be provided to reference “complete communities” and respect for the natural system, including provision for low impact development.</p>	<p>2.</p>	<p>That 1.1.3.2 (b) of the PPS be revised to read:</p> <p>(b) a range of uses and opportunities for <i>intensification</i> and <i>redevelopment</i>, <b><i>where appropriate</i></b>, in accordance with the criteria in policy 1.1.3.3.</p> <p>That 1.1.3.2 of the PPS be revised to include additional criteria that land use patterns in settlement areas provide for complete communities, and respect for the natural system, including provision for low impact development.</p>
<p>1.1.3.3: Planning authorities shall identify and promote opportunities for <i>intensification</i> and <i>redevelopment</i> where this can be accommodated taking into account existing building stock or areas, including <i>brownfield sites</i>, and the availability of suitable existing or planned <i>infrastructure</i> and <i>public service facilities</i> required to accommodate projected needs.</p>	<p>These policies are interpreted by development proponents as permitting intensification at any cost, for the sake of intensification, whether or not is it appropriately located, permitted by official plans, or supported by necessary community infrastructure. The policies should be revised to tie intensification to neighbourhood character appropriate locations, and in accordance with municipal official plans.</p>	<p>3.</p>	<p>That 1.1.3.3 of the PPS be revised to read:</p> <p>1.1.3.3 Planning authorities shall identify <b><i>appropriate locations</i></b> for and promote opportunities <b><i>in their official plans</i></b> for <i>intensification</i> and <i>redevelopment</i> where this can be accommodated taking into account <b><i>neighbourhood character</i></b> ,existing building stock or areas, including <i>brownfield sites</i>, and the availability of suitable existing or planned <i>infrastructure</i> and <i>public service facilities</i> required to accommodate projected needs.</p>

Policy	Comment	No.	Recommendation
<p><i>Intensification and redevelopment</i> shall be directed in accordance with the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.</p>			<p><i>Intensification and redevelopment</i> shall be directed <b><u>by municipal official plans</u></b> in accordance with the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.</p>
<p><b>1.3 Employment Areas</b></p>			
<p>1.3.2: Planning authorities may permit conversion of lands within <i>employment areas</i> to non-employment uses through a <i>comprehensive review</i>, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.</p>	<p>To be consistent with the Growth Plan, this policy should be revised to clarify that a major retail use is considered a non-employment use.</p>	<p>4.</p>	<p>That 1.3.2 of the PPS be revised by adding the following:  <b><u>For the purposes of this Provincial Policy Statement, major retail uses are considered non-employment uses.</u></b></p>
<p><b>1.4 Housing</b></p>			
<p>1.4.1: ...planning authorities shall: (b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential</p>	<p>The supply of zoned or registered lots is beyond municipal control as it is largely a function of the housing market which determines the build out of supply, the registration of draft plans of subdivision, and the submission of</p>	<p>5.</p>	<p>That the PPS be revised by deleting 1.4.1 (b)</p>

Policy	Comment	No.	Recommendation
<p>units available through lands suitably zoned to facilitate <i>residential intensification</i> and <i>redevelopment</i>, and land in draft approved and registered plans.</p>	<p>new draft plans.</p>		
<p>1.4.3: Planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the <i>regional market area</i> by:                      (a) establishing and implementing minimum targets for the provision of housing which is <i>affordable to low and moderate income households</i>. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;</p>	<p>The use of the word “targets” requires clarification. Is a target a measurable objective to achieve conformity with the Plan? What happens if a target is not achieved?</p> <p>The reference to low and moderate income households may be difficult to administer given the forthcoming proposed changes to census information.</p>	<p>6.</p>	<p>That the use of “targets” 1.4.3 (a) of the PPS be clarified.</p>

Policy	Comment	No.	Recommendation
<p>(b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including special needs requirements; and</li> <li>2. all forms of <i>residential intensification</i> and <i>redevelopment</i> in accordance with policy 1.1.3.3</li> </ol>	<p>This policy should be revised to tie intensification to appropriate locations, in accordance with municipal official plans.</p>	<p>7.</p>	<p>That 1.4.3 (b) 2 of the PPS be revised to read:</p> <ol style="list-style-type: none"> <li>2. all forms of <i>residential intensification</i> and <i>redevelopment</i> in accordance with <b><u>municipal official plans</u></b> and policy 1.1.3.3.</li> </ol>
<p><b>1.5 Public Spaces, Parks and Open Spaces</b></p>			
<p>1.5.1: Healthy, active communities should be promoted by:</p>	<p>The adjective “sustainable” should be added so that communities are healthy, active and sustainable.</p>	<p>8.</p>	<p>That 1.5.1 of the PPS of the PPS be revised to read:</p> <p>“Healthy, active <b><u>and sustainable</u></b> communities should be promoted by:</p>
<p><b>1.6 Infrastructure and Public Service Facilities</b></p>			
<p>1.6.4.1 (b): Planning for <i>sewage and water services</i> shall: ensure that these systems are provided in a manner that:</p> <ol style="list-style-type: none"> <li>1. can be sustained by the water resources upon which such services rely;</li> </ol>	<p>This section should be revised to refer to new municipal sewage and water services, and to include references to water conservation and efficiency plans, and financial plans which achieve full cost recovery.</p>	<p>9.</p>	<p><b><u>That 1.6.4.1.(b) of the PPS be deleted and replaced with:</u></b></p> <p><b><u>“ensure that new municipal sewage services and municipal water services are supported by:</u></b></p> <ol style="list-style-type: none"> <li><b><u>1. water conservation and efficiency plans which are regularly updated;</u></b></li> </ol>

Policy	Comment	No.	Recommendation
<p>2. is financially viable and complies with all regulatory requirements; and</p> <p>3. protects human health and the natural environment.</p> <p>1.6.4.1 (c): Planning for <i>sewage and water services</i> shall: promote water conservation and water use efficiency;</p>	<p>This policy is covered in 1.6.4.1 (b), as revised above, and should be deleted.</p>	<p>10.</p>	<p><b><u>2. financial plans which achieve full cost recovery;</u></b>  <b><u>3. compliance with all regulatory requirements”.</u></b></p> <p>That 1.6.4.1 (c) of the PPS be deleted.</p>
<p>1.6.7.2: <i>Airports</i> shall be protected from incompatible land uses and development by:</p> <p>(a) prohibiting new residential <i>development</i> and other sensitive land uses in areas near <i>airports</i> above 30 NEF/NEP, as set out on maps (as revised from time to time) that have been reviewed by Transport Canada;</p> <p>(b) considering redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been</p>	<p>The official plans of regional and local municipalities in the vicinity of Pearson International Airport incorporate an Airport Operating Area (AOA) rather than the 30NEF/NEP contour. The AOA, which was developed in consultation with the Greater Toronto Airports Authority, and approved by the OMB, follows identifiable physical features as close as possible to the 30NEF/NEP contour, and, as such, is easier to administer as a land use planning tool. This policy should provide for it.</p> <p>The reference to “no negative</p>	<p>11.</p> <p>12.</p>	<p>That 1.6.7.2 (a) of the PPS be revised to read:</p> <p>(a) prohibiting new residential <i>development</i> and other sensitive land uses in areas near <i>airports</i> above 30 NEF/NEP, <b><u>or its equivalent</u></b>, as set out on maps (as revised from time to time) that have been reviewed by Transport Canada;</p> <p>That 1.6.7.2 (b) of the PPS be revised to read:</p> <p>(b) considering redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been demonstrated that there will be no negative <b><u>cumulative</u></b> impacts on the long-</p>



Policy	Comment	No.	Recommendation
demonstrated that there will be no negative impacts on the long-term function of the <i>airport</i> ; and	<i>impacts on the long-term function of the airport</i> ” is too broad and difficult to determine. It should be revised instead to refer to “no negative cumulative impacts”.		term function of the <i>airport</i> ; and
<b>1.7 Long-Term Economic Prosperity</b>			
1.7.1: Long-term economic prosperity should be supported by: (e) planning so that major facilities (such as airports, transportation/transit/rail infrastructure and corridors, intermodal facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries and resource extraction activities) and <i>sensitive land uses</i> are appropriately designed, buffered and/or separated from each other to prevent <i>adverse effects</i> from odour, noise and other contaminants, and minimize risk to public health and safety;	This is a difficult policy to implement at a local level when a potential conflict arises. The D-6 Guidelines of the Ministry of Environment are difficult to work with, leaving uncertainty with respect to odour and dust. Dust and odour studies are difficult to scope with respect to their requirements for development review.	13.	That 1.7.1 (e) of the PPS be clarified with respect to consideration of the adverse effect from odour and other contaminants.

Policy	Comment	No.	Recommendation
<b>1.8 Energy and Air Quality</b>			
1.8.3: <i>Alternative energy systems and renewable energy systems shall be permitted in settlement areas, rural areas and prime agricultural areas in accordance with provincial and federal requirements.</i>	This section may no longer be relevant as it may be superseded by the <i>Green Energy Act</i> .	14.	That 1.8.3 of the PPS be reviewed in light of the <i>Green Energy Act</i> .
<b>2.0 Wise Use and Management of Resources</b>			
<b>2.1 Natural Heritage</b>			
2.1.2: The diversity and connectivity of natural features in an area, and the long-term <i>ecological function</i> and biodiversity of <i>natural heritage systems</i> , should be maintained, restored or, where possible, improved, recognizing linkages between and among <i>natural heritage features and areas, surface water features and ground water features</i> .	The use of the words “should” and “where possible” weakens the policy.	15.	That 2.1.2 be revised to read:  The diversity and connectivity of natural features in an area, and the long-term <i>ecological function</i> and biodiversity of <i>natural heritage systems</i> , <b><i>shall</i></b> <del>should</del> be maintained, restored or, <del>where possible</del> , improved, recognizing linkages between and among <i>natural heritage features and areas, surface water features and ground water features</i> .
2.1.4: Prohibits development and site alteration in identified significant natural features unless it has been demonstrated there	Natural areas in southern Ontario are degraded and in need of improvement. Consequently, these policies should require that	16.	That 2.1.4 and 2.1.6 of the PPS be revised by deleting the words “no negative impacts” and replacing them with “a net gain”.

Policy	Comment	No.	Recommendation
<p>will be no negative impacts on the natural features or their ecological function.</p> <p>2.1.6: <i>Development and site alteration</i> shall not be permitted on <i>adjacent lands</i> to the <i>natural heritage features and areas</i> identified in policies 2.1.3, 2.1.4 and 2.1.5 unless the <i>ecological function</i> of the <i>adjacent lands</i> has been evaluated and it has been demonstrated that there will be no <i>negative impacts</i> on the natural features or on their <i>ecological functions</i>.</p>	<p>development and site alteration will only be permitted where there is a net gain to the natural feature so as to benefit or enhance the environment, rather than maintaining the status quo.</p>		
<b>2.6 Culture Heritage and Archaeology</b>			
<p>2.6.1: Significant <i>built heritage resources</i> and <i>significant cultural heritage landscapes</i> shall be conserved.</p>	<p>The <i>Ontario Heritage Act</i> should be strengthened to give municipalities tools to conserve <i>significant built heritage resources</i> and <i>significant cultural heritage landscapes</i>.</p>	17.	<p>That the <i>Ontario Heritage Act</i> be strengthened to give municipalities tools to conserve <i>significant built heritage resources</i> and <i>significant cultural heritage landscapes</i>.</p>

Policy	Comment	No.	Recommendation
<b>6. Definitions</b>			
“should”	In some policies the PPS uses the term “should” whereas “shall” is used in many other policies. Given the different use of these words, a definition of “should” is required.	18.	That Section 6, Definitions of the PPS be revised to provide a definition of “should”.
“major retail”	A clear definition of “major retail” should be provided to determine what is considered an employment use.	19.	That Section 6, Definitions of the PPS be revised to provide a definition, preferably with respect to building size, of “major retail”.
“employment area”	The definition of “employment area” should be clarified so as to not include a single employment use on a lot, which may have potential for infill of additional employment uses on the same lot.	20.	That the definition of “employment area” in Section 6, Definitions of the PPS be revised to clarify it does not include a single employment use on a lot.
“intensification”	The policies of the PPS refers to “intensification and redevelopment”, whereas the definition of intensification includes redevelopment. The policies of the PPS should be revised to eliminate this redundancy, or the definition of intensification be revised to delete the term redevelopment.	21.	That the policies of the PPS be revised to replace the term “intensification and redevelopment” with “intensification” or the definition of intensification be revised to delete the term “redevelopment”.

<b>Policy</b>	<b>Comment</b>	<b>No.</b>	<b>Recommendation</b>
“complete community”	A new focus on “complete communities” in the PPS will be assisted by providing a definition for the same.	22.	That Section 6, Definitions of the PPS be revised to provide a definition for “complete community”.
“active and passive recreation “	The terms “active and passive recreation” should be used instead of “recreation” and definitions for the same be provided.	23.	That the PPS be revised by replacing the word “recreation” with “active and passive recreation” and that Section 6, Definitions of the PPS be revised to provide definitions for “active and passive recreation”.