



Legislative & Planning  
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1151 Bronte Road  
Oakville ON L6M 3L1

October 21, 2019

Sean Fraser, Director  
Provincial Planning Policy Branch  
777 Bay Street  
13<sup>th</sup> floor  
Toronto, ON M5G 2E5

Dear Mr. Fraser:

**RE: Provincial Policy Statement Review – Proposed Policies**

Thank you for the opportunity to provide input with respect to the Provincial Policy Statement (PPS) Review. Halton Region welcomes the opportunity to participate in the Ministry of Municipal Affairs and Housing's request for comments regarding proposed changes to the PPS in response to the posting on the Environmental Registry of Ontario (ERO 019-0279).

At its October 16, 2019 meeting, Regional Council discussed proposed changes to the PPS and endorsed both Report No. LPS105-19 (Comments on Proposed PPS Changes - Joint HAPP Response) and a Joint Submission from the Halton Area Planning Partnership (HAPP), which provides comments on the proposed PPS and responses to consultation questions posed by the Ministry.

Please find enclosed herewith the Region's endorsed submissions on the proposed PPS:

- Attachment #1: Halton Staff Report No. LPS105-19 Re: Comments on Proposed PPS Changes - Joint HAPP Response
- Attachment #2: Joint Submission on the Proposed Changes to The Provincial Policy Statement (cover submission, response to consultation questions, and policy comments and recommendations)

If you have any questions or concerns regarding the Region's submissions on the proposed PPS changes, we would be pleased to meet with you to review and discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt Benson", written in a cursive style.

Curt Benson  
Director, Planning Services and Chief Planning Official  
[curt.benson@halton.ca](mailto:curt.benson@halton.ca)

**Regional Municipality of Halton**

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Report To:	Regional Chair and Members of Regional Council
From:	Bob Gray, Acting Commissioner, Legislative and Planning Services and Corporate Counsel
Date:	October 16, 2019
Report No. - Re:	LPS105-19 - Comments on the Proposed Changes to the Provincial Policy Statement: Joint Submission from Halton Municipalities and Conservation Authorities

## RECOMMENDATION

1. THAT Report No. LPS105-19 Re: "Comments on the Proposed Changes to the Provincial Policy Statement: Joint Submission from Halton Municipalities and Conservation Authorities" be endorsed.
2. THAT the Regional Clerk forward a copy of Report No. LPS105-19 and Attachment #1 to the Ministry of Municipal Affairs and Housing (MMAH), the Halton Area MPPs, the City of Burlington, the Town of Halton Hills, the Town of Milton, the Town of Oakville, Conservation Halton, the Credit Valley Conservation Authority and the Grand River Conservation Authority for their information.

## REPORT

### **Executive Summary**

- On July 22, 2019 the Provincial government released changes to the Provincial Policy Statement (PPS) through the Environmental Registry of Ontario as a Policy Proposal Notice ["The Proposal"], ER Number: 019-0279. The Proposal was accompanied by a series of questions seeking feedback.
- The Halton Area Planning Partnership (HAPP) has reviewed the proposed changes and has developed a joint Halton municipal and conservation authority response to the MMAH (Attachment #1 – document under separate cover).
- This report provides information to Regional Council on the nature of the proposed changes to the PPS and recommends that Council endorse the joint submission as outlined in this Report.

## Background

The PPS is a consolidated statement of the Provincial government's policies on land use planning. It provides policy direction on key land use planning issues that affect communities, such as the efficient use and management of land and infrastructure, the provision of sufficient housing to support residential and job growth and the protection of the environment and natural resources. Municipalities are required to be consistent with the PPS in all their planning decisions as required by paragraph 3(5)(a) of the *Planning Act*.

The PPS is issued under section 3 of the *Planning Act*. The most recent update of the PPS came into force and effect on April 30, 2014. On July 22, 2019 the government released The Proposal. These proposed changes were part of a coordinated initiative with the stated purpose of increasing housing supply, cutting red tape and supporting jobs through the strategic plan: "More Homes, More Choice: Ontario's Housing Supply Action Plan", released on May 2, 2019.

The proposed changes to the PPS are intended to support the following objectives of the Provincial government:

- Encourage the development of an increased mix and supply of housing.
- Protect the environment and public safety.
- Reduce barriers and costs for development and provide greater predictability.
- Support rural, northern and Indigenous communities.
- Support the economy and job creation.

Through this consultation the Province has specifically requested responses to the following questions:

- Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?
- Do the proposed policies strike the right balance? Why or why not?
- How do these policies take into consideration the views of Ontario communities?
- Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?
- Are there any other tools that are needed to help implement the proposed policies?

## Discussion

HAPP has reviewed the proposed changes and has developed a joint submission to respond to both the Proposal and questions posed by the Province (Appendix 1). The submission identifies several key areas where changes were deemed significant and

where changes to the Proposal should be addressed to satisfy concerns and capitalize on opportunities. These key areas are:

### **1. Softening of Certain Policies “Shall to Should”**

The proposed PPS has softened municipal decision making standards from a mandatory “shall” to a less directive “should” for a number of important policies, as detailed in Attachment #1. These changes will likely compromise a municipality’s ability to defend good planning decisions, especially in the absence of a clear Provincial definition of how the “should” standard is to be interpreted and implemented. As a result, it is recommended that the proposed PPS be modified to maintain the PPS 2014 “shall” standard for these policies.

### **2. References to Undefined “Market” Factors and Terms**

There are several new proposed policy changes in the updated PPS that make reference to “market” based terms such as: accommodating an appropriate “market-based” range and mix of residential types to meet long-term needs (section 1.1.1.b); demonstrating a “market demand” test as part of the requirements for a settlement boundary expansion (section 1.1.3.8); providing for an appropriate range and mix of housing options to meet projected “market-based needs” (section 1.4.3); and encouraging residential uses to respond to dynamic “market-based needs” (section 1.7.1.b). There is concern that none of these proposed “market” based terms are defined in the updated PPS which leaves municipalities with little direction about how to apply these tests to decisions on planning matters.

Furthermore, with the introduction of the “market” tests in PPS policies such as the requirement for a settlement boundary expansion (section 1.1.3.8), there is concern that it would place the market as being more important than other community objectives in justifying the merits of a proposal. This does not represent good planning, nor is it consistent with implementing a broad range of matters defined by the *Planning Act* as representing the Provincial interest.

It is recommended that the Province remove references to the “market” as a basis for determining the merits of a policy or development proposal.

### **3. Proposed Changes to Prioritize Development Applications**

Proposed changes to section 4.7 of the PPS mandate that municipalities “shall” take action to support “streamlining”, “fast-tracking” and “prioritizing” applications to facilitate increased housing and job-related growth and development. This policy change is particularly important given that recent changes to the *Planning Act* under Bill 108, have already mandated that municipalities significantly fast track municipal planning decisions through reduced approval times. Introducing a new implementation policy in the proposed PPS that further mandates faster decision-making does not provide municipalities the discretion to prioritize and balance a range

of policy interests in application review, including impacts on housing supply and job growth.

It is recommended the proposed policy be modified from a directive “shall take action” to a more flexible “should take action” to provide planning authorities with some discretion to determine which planning applications should be prioritized for fast tracking, while balancing a range of policy interests, especially since some delays are caused by protracted Provincial reviews and a lack of quality supporting information from the proponent.

#### **4. Considerations for Climate Change Adaptation Mitigation Policy Directions**

There are numerous policy changes and additions to the PPS in support of climate change adaptation, including a new definition related to climate change impacts. This definition however, only speaks to the “impacts of a changing climate” and does not address the broader causes and drivers of climate change. Furthermore, with the introduction of climate change adaptation language, there is a great opportunity to enhance existing policies aimed at mitigating climate change and reducing greenhouse gas levels by encouraging the use of green infrastructure, sustainable housing and renewable energy systems. This is particularly important given that all municipalities in Halton have declared climate emergencies to respond to the growing public concern over climate change impacts and the need to make climate action a priority.

Therefore, it is recommended that the Province broaden its climate change response within the PPS to include mitigation policies and directives.

#### **5. Changes to Indigenous Engagement**

Changes to the proposed PPS include a welcome emphasis on the importance and value of the unique role Indigenous communities play in land use planning through consultations with municipalities. There is, however, a pressing need for Provincial guidance to support implementation of these policies by providing municipalities with clear directions on what will be expected through consultation and which applications will require consultation with Indigenous communities.

Therefore, it is recommended that the Province develop consultation guidelines so that there is a mutual understanding of what constitutes meaningful engagement.

#### **6. Changes to the Implementation and Interpretation Section**

Significant changes are proposed to the “Implementation and Interpretation” section of the PPS, most notably the relocation of section 4.9 that enables municipalities to go beyond the PPS minimum standards when making decisions on planning matters, as well as other changes as indicated in Attachment #1. There is a concern that

relocating policies from the Implementation section to the Preamble creates ambiguity and de-emphasizes their importance as directional policies that municipalities can reference when making planning decisions.

Therefore, it is recommended that the Province maintain the “minimum standards” policy and other directional policies in the "Implementation and Interpretation" section instead of removing them or relocating them to the Preamble of the PPS.

## **7. References to Implementation Guidelines**

There are numerous policy changes in the proposed PPS where references are made to unknown, draft, or non-existent guidelines that are intended to help implement the policies as indicated in Appendix 1. These policies are essentially incomplete if the guidelines that help implement them are not clearly identified in the PPS and are not finalized for public use. Furthermore, it is difficult to provide an accurate evaluation of the impact of proposed policies that reference guidelines when these guidelines are not clearly identified and not yet in place.

Therefore, it is important that the Province clearly identify these guidelines and consult extensively with municipalities to ensure that they have utility and can be implemented through planning decisions.

## **8. Changes Related to Mineral Aggregate Extraction**

Section 2.5.2.1 of the PPS requires that as much of the mineral aggregate resources that are realistically possible shall be made available as close to markets as possible. In addition, this policy indicates that there is no requirement to demonstrate need for mineral resources, including demand/supply analysis, in order to extract these resources locally or elsewhere. However, in order to establish an appropriate balance to protect aggregate resources and other important provincial interests such as protection of agricultural lands and natural heritage areas, it is recommended that the PPS be amended to require a proponent to demonstrate the need for any additional supply of aggregate resources before extraction can occur as indicated in Appendix 1. This position is consistent with the resolution of Regional Council from its meeting in April 2019.

Further, the Proposal includes changes to section 2.5.2.2 in the PPS that allow for extraction in natural heritage features (outside of the Greenbelt) provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological function. Aggregate extraction operations, although considered an interim use, may be in operation for decades. The proposed policy change permits mineral aggregate extraction in natural heritage features such as significant woodlands, fish habitat, and habitat of endangered and threatened species provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions. This change would allow extraction within some

of the most significant and sensitive natural heritage features, and is not consistent with the Region's approach to protect the Natural Heritage System.

Another policy change in this section of the PPS requires clarification. The revised wording of section 2.5.2.4 states that where the *Aggregate Resources Act* applies, processes under that Act shall address the depth of extraction of new or existing mineral aggregate operations. The intent of the policy is not clear, but it suggests that planning authorities would not have the opportunity to comment on the depth of the extraction. This is an important consideration in the review of an aggregate application as depth is likely a factor in determining the impact to the water table which has broad ranging implications on the quality of the private drinking water supply (i.e. nearby private wells) as well as impacts to the broader hydrogeological system needed to support the Region's Natural Heritage System. It is necessary to be able to review and comment on the depth of extraction to determine the conformity of the application with the Regional Official Plan.

## **Conclusion**

The proposed PPS includes positive changes that strengthen policies related to climate change adaptation and indigenous engagement. There are also opportunities for a number of enhancements to these important policies to ensure that they can be effectively implemented as described in Attachment #1. Some policy changes can be improved through modification, such as requiring a demonstration of need for aggregate resources extraction, maintaining directive policy statements in the "Implementation and Interpretation" section, and strengthening/softening directive language "shall vs. should" as appropriate. In addition, there are a number of policy changes that the Province has introduced in the PPS such as changes to mineral aggregate policies that permit extraction in natural heritage features, which will likely result in significant impacts to Halton's Natural Heritage System. These are not supported and should be removed from the PPS given their impacts to Halton.

## FINANCIAL/PROGRAM IMPLICATIONS

There are no financial implications arising from this report. Staff continue to monitor all changes (legislative, regulatory, policy and program area) associated with the Province's amendments to the Provincial Policy Statement. Staff will provide an update to Council if any further changes related to this effort result in financial impact to the Region.

Respectfully submitted,

<Curt Benson SIGNATURE>

Curt Benson  
Director, Planning Services and Chief  
Planning Official

<Bob Gray SIGNATURE>

Bob Gray  
Acting Commissioner, Legislative and  
Planning Services and Corporate Counsel

Approved by

<Jane MacCaskill SIGNATURE>

Jane MacCaskill  
Chief Administrative Officer

If you have any questions on the content of this report,  
please contact:

Curt Benson

Tel. # 7181

Attachments: Attachment #1 – Joint Submission on the Proposed Changes to the PPS (under separate cover)



# Joint Submission on the Proposed Changes To The Provincial Policy Statement

October 2019



## Introduction

The Halton Area Planning Partnership (HAPP) is comprised of Halton Region, City of Burlington, Town of Halton Hills, Town of Milton, Town of Oakville, Credit Valley Conservation, Grand River Conservation Authority and Conservation Halton.

This submission represents HAPP's collective review and joint response to the proposed changes to the Provincial Policy Statement (PPS) in support of the release of the "More Homes, More Choice: Ontario's Housing Supply Action Plan" in May. The proposed changes were placed on the Environmental Registry of Ontario as a Policy Proposal Notice (ER Number: 019-0279) on July 22, 2019 with a 91-day comment period ending October 21, 2019. According to the notice, the proposal was prepared by the Ontario Ministry of the Municipal Affairs and Housing to help increase the supply of housing, support jobs and reduce barriers and costs in the land use planning system.

HAPP welcomes this opportunity to have its collective voice heard by responding to the proposed changes to the PPS. HAPP's response includes:

1. This letter, which contains comments and recommendations related to main areas of proposed change within the PPS that are relevant to and important for Halton.
2. Appendix 1, which contains in table form responses to provincial questions and comments addressing specific changes to sections and policies within the PPS.

## Background

The Provincial Policy Statement (PPS) is a consolidated statement of the government's policies on land use planning. It was issued under section 3 of the *Planning Act* and came into force and effect on April 30, 2014.

On May 2, 2019, the government released "More Homes, More Choice: Ontario's Housing Supply Action Plan". The Action Plan included a series of initiatives to address housing supply, including a review of the PPS.

On July 22, 2019 the government released changes to the PPS through the Environmental Registry of Ontario as a Policy Proposal Notice (ER Number: 019-0279). The proposed changes to the PPS are meant to support the government's following objectives:

- Encourage the development of an increased mix and supply of housing.
- Protect the environment and public safety.
- Reduce barriers and costs for development and provide greater predictability.
- Support rural, northern and Indigenous communities.
- Support the economy and job creation.

In addition to proposed modifications to the PPS, the government is seeking feedback through responses to the following questions:

- Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?
- Do the proposed policies strike the right balance? Why or why not?

- How do these policies take into consideration the views of Ontario communities?
- Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?
- Are there any other tools that are needed to help implement the proposed policies?

## Key Points of HAPP's Response

### 1. Softening of Important Policy Standards from “Shall” to “Should”

The proposed PPS has softened municipal decision making standards from a mandatory “shall” to a less directive “should” for a number of important policies, including: settlement area policies concerning the form, mix, and type of new development that makes most efficient use of land, infrastructure and public facilities (section 1.1.3.6); requirements to establish and implement phasing to achieve orderly growth and development (section 1.1.3.7); and requirements for efficient use of existing and planned transportation infrastructure (section 1.6.7.2). These changes will likely compromise a municipality’s ability to uphold and enforce good planning decisions, especially in the absence of a clear provincial definition of how the “should” standard is to be interpreted and implemented. As a result, It is recommended that the updated PPS be modified to maintain the PPS 2014 “shall” directives for these policies.

### 2. Introduction of “Market” Considerations

With the introduction of the “market” tests in PPS policies such as the requirement for a settlement boundary expansion (section 1.1.3.8), there is concern that the PPS appears to elevate “market” to a foundational component that is more important than other community objectives in justifying the merits of a proposal, particularly as it relates to housing. This is not consistent with implementing a broad range of matters defined by *the Planning Act* as representing the Provincial interest.

Therefore, it is recommended that the Province remove references to “market” as a basis for determining the merits of a policy or development proposal and replace them with references to an appropriate range and mix of housing options and densities.

### 3. Proposed Changes to Prioritize Development Applications

Proposed changes to section 4.7 of the PPS mandate that municipalities “shall take action to support “streamlining”, “fast-tracking” and “prioritizing” applications to facilitate increased housing and job-related growth and development, but does not provide a clear definition of what constitutes a priority application such as “affordable housing” or how it can be determined. Given that recent changes to the *Planning Act* under Bill 108, have already mandated that municipalities significantly fast track municipal planning decisions, introducing a new implementation policy in the PPS that further mandates faster decision-making appears does not provide municipalities discretion to prioritize and balance a range of policy interests in application review, including impacts on housing supply and job growth.

It is recommended the proposed policy be modified from a directive “shall take action” to a more flexible “should take action” to provide planning authorities with some discretion

to make determinations what planning applications should be prioritized for fast tracking, while balancing a range of policy interests.

#### **4. Considerations for Climate Change Adaptation and Mitigation Policies**

There appears to be numerous welcomed policy changes throughout the proposed PPS that require municipalities and planning authorities to “prepare for the impacts of a changing climate” when making decisions on planning matters. The new climate change definition in the proposed PPS only speaks to the “impacts of a changing climate” and does not address the broader causes and drivers of climate change. It is recommended that the Province expand this definition to acknowledge the need to both “prepare for” and “mitigate” against climate change. This is particularly important given that many municipalities and agencies within Halton have recently declared “climate emergencies” to respond to the growing public concern over climate change impacts and calls to identify it as a priority issue.

Furthermore, with the addition of language around responding to the impact of climate change there is a great opportunity as well to improve existing policies to address climate change mitigation and reduce greenhouse gases through the use of green infrastructure, sustainable housing, and renewable energy systems. These additional changes could assist the Province in lowering its emissions, preserving air quality, and meeting targets and objectives outlined in the “Preserving and Protecting our Environment for Future Generations, A made-in-Ontario Environment Plan”.

#### **5. Changes to Indigenous Engagement**

The updated PPS emphasizes the importance and value of the unique role Indigenous communities play in land use planning and development. Halton’s planning partners acknowledge the need for engagement with Indigenous communities on land use matters as well as when conserving cultural heritage. There is, however, a need for the Province to provide additional guidance to support implementation of these policies so municipalities have clearer direction on what will be expected through consultation and what applications will require consultation with Indigenous communities. The Province needs to develop consultation guidelines so that there is a mutual understanding of what constitutes meaningful engagement.

#### **6. Changes to the Implementation and Interpretation Section**

Significant changes are proposed to the “Implementation and Interpretation” section of the proposed PPS, most notably the removal of section 4.9 PPS, 2014 minimum standards policy statement that enables municipalities to go beyond the PPS policies when making decisions on planning matters. This policy has been a longstanding statement in the “Implementation and Interpretation” section of the PPS since the establishment of the PPS, 2005. While this statement has been relocated to the Preamble of the proposed PPS, HAPP is concerned that relocating the minimum standards and other PPS 2014 implementation policies de-emphasizes their importance as expressed directional policies that municipalities can reference when making planning decisions. It is recommended that the Province maintain the minimum standards and other directional policies in the “Implementation and Interpretation” section instead of removing them or relocating them to the Preamble of the PPS.

## **7. Implementation Guidelines**

There are numerous policy changes in the proposed PPS where references are made to unknown, draft, or non-existent guidelines that are intended to help implement the policies (such as section 1.1.3.8.e) which appear to relate to the draft Provincial Agricultural Impact Assessment Guidelines released for public comments in March 2018 but not finalized, or section 2.1.10 references to wetland management guidelines that are non-existent). These policies are essentially incomplete if the guidelines that help implement them are not clearly identified in PPS and not finalized for public use. Furthermore, it is difficult for HAPP to provide an accurate evaluation of the impact of proposed policies that reference guidelines when these guidelines are not clearly identified and not yet in place.

PPS policies should largely be developed with sufficient detail to help municipalities and planning authorities achieve planning outcomes without having to rely on supplemental guidance. If certain guidelines are essential to implement PPS policies (such as guidelines that are identified in Attachment 1), it is important that the Province clearly identify these guidelines and consult extensively with municipalities to ensure that they have utility and can be implemented through planning decisions.

## **8. Changes to Permit Mineral Aggregate Extraction in Natural Heritage Features**

The proposed change to section 2.5.2.2 in the PPS is concerning to HAPP as it introduces consideration for extraction in natural heritage features (outside the Greenbelt) provided that the long-term rehabilitation can demonstrate no-negative impacts on the natural feature and its ecological function. Most aggregate extraction, although considered an interim use, may be in operation for decades. The proposed policy change permits mineral aggregate extraction in natural heritage features such as provincially significant woodlands, fish habitat, and habitat of endangered and threatened species provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions. This would appear to allow extraction within some of the most significant and sensitive natural heritage features without having to demonstrate “no negative impact” to these features until rehabilitation has commenced. Also, the proposed policy has no regard for hydrological features and functions that play an important role in these sensitive habitats nor for the connectivity between habitats and features. Rehabilitation, for most “below the water table” quarry operations, never returns the affected site to a similar state of features and functionality as they are most likely to become aquatic habitats as opposed to terrestrial habitats, especially in Halton Region. Claiming that an aquatic habitat will replace the previous terrestrial habitat in functionality and connectivity, most likely will not meet the “no negative impact” test. HAPP therefore does not support the addition of this policy and strongly suggests it be removed

## **Conclusion**

There is support for the Province’s introduction of a number of changes to the PPS that strengthen policies related to climate change and indigenous engagement, and suggests a number of enhancements to these important policies to ensure that they can be effectively implemented. Some proposed policy changes can be improved through modification, such as maintaining directive policy statements in the “Implementation and Interpretation” section or by strengthening/softening directive language “shall vs. should” as appropriate and where indicated

in Appendix 1. In addition, there are a number of policy changes that the Province has introduced in the PPS such as changes to mineral aggregate policies that permit extraction in natural heritage features, which would have significant impacts to Halton's planning partners. These are not supported and should be removed from the PPS given their impacts to Halton.

Thank you for providing the Region, its Local Municipalities, and Conservation Authorities the opportunity to comment on the proposed changes to PPS. It is recommended that the Province update the PPS to reflect our collective comments. We welcome the opportunity to have further discussions with Provincial staff to clarify our comments prior to the release of the final amendments to the PPS.

Respectfully submitted,

**Curt Benson, MCIP, RPP**  
Director of Planning Services &  
Chief Planning Official  
Halton Region



**Heather MacDonald, MCIP, RPP**  
Director and Chief Planner  
Department of City Building  
City of Burlington



**John Linhardt, MCIP, RPP**  
Commissioner of Planning & Sustainability  
Town of Halton Hills



**Barb Koopmans, MCIP, RPP**  
Commissioner of Planning & Development  
Town of Milton



**Mark H. Simeoni, MCIP, RPP**  
Director of Planning Services  
Town of Oakville



**Barb Veale, PhD, MCIP, RPP**  
Director, Planning and Watershed Management  
Conservation Halton



**Nancy Davy**  
Director of Resource Management  
Grand River Conservation Authority



**Josh Campbell, RPP**  
Director of Planning and Development Services  
Credit Valley Conservation



## Proposed Changed to the *Provincial Policy Statement*

## APPENDIX 1

**Table 1:** Responses to consultation questions that have been posed by the Province:

Consultation Questions	Proposed Final Comments
<p>1 Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?</p>	<p>The proposed modifications may support the goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction, however, HAPP has concerns with the following proposed policy changes:</p> <ul style="list-style-type: none"> <li>- Allowing mineral aggregate operations outside of the Greenbelt area to use rehabilitation plans to demonstrate that extraction will have no negative impacts which may result in permanent damage to significant natural features and their functions (Clause 2.5.2.2.).</li> <li>- Requiring the fast-tracking of development applications without giving municipalities the discretion to make such decisions. (Clause 4.7 a)).</li> <li>- Removing specific actions in land use planning that were meant to improve accessibility for persons with disabilities and older persons as prescribed by the Accessibility for Ontarians with Disabilities Act.</li> <li>- Removing requirements to coordinate with lower tier municipalities populations, housing and employment projections</li> <li>- Not providing a clear definition of "Market-based".</li> <li>- Only including climate change adaptation definition and recommendations and missing many opportunities to include encourage climate change mitigation.</li> <li>- Changes to the Implementation and Interpretation section affecting policies such as 4.9 (PPS as a minimum standard).</li> </ul>
<p>2 Do the proposed policies strike the right balance? Why or why not?</p> <p>How do the responses answer the questions about balance?</p>	<p>The proposed changes to the PPS strive to strike the right balance between providing sufficient housing options and protecting the environment and public safety, however it does not achieve this balance in many policy areas including:</p> <ul style="list-style-type: none"> <li>- Providing a strong planning foundation through clear and direct implementation policies, which has been somewhat weakened by proposed relocation of policies 4.9, 4.11, 4.12 and 4.13 from the "Implementation and Interpretation" section to the Preamble or Part II (How to Read the PPS), which address :</li> </ul>

	<ul style="list-style-type: none"> <li>• Minimum standards and the statement that planning authorities and decision makers are permitted to go beyond the minimum standards established in the PPS (Clause 4.9 -moved to Part III).</li> <li>• Infrastructure projects requiring approval under other legislation and regulations including the Environmental Assessment Act (Clause 4.11 – moved to Part I).</li> <li>• Provincial plans such as the Greenbelt Act taking precedence over the PPS (Clause 4.12 – moved to Part III). and</li> <li>• Agreements within the Great Lakes – St. Lawrence being considered (Clause 4.13 moved to Part I).</li> </ul> <p>- Addressing the urgency of climate change and its impacts on the Province, which the PPS partially addresses through the addition of climate change adaptation language. However, the PPS should also be changed to place more emphasis on climate change mitigation through green and low impact development as well as encouraging renewable energy systems.</p> <p>- There are instances where “shall” has been changed to a “should” making the policy more permissive (s.1.1.3.6, s.1.1.3.7 and s.1.6.7.2). Such change, especially in the context of the Greater Golden Horseshoe region, may impede municipalities’ work to manage growth and development in a way that protects important natural and agricultural resources</p>
<p>3 How do these policies take into consideration the views of Ontario communities?</p>	<p>There is a concern with proposed changes to policy 2.5.2.2, which allows mineral aggregate extraction to be considered in natural heritage features outside of the Greenbelt area, provided that the long-term rehabilitation plan can demonstrate no negative impacts on the natural features and their ecological functions. It is our position that although aggregate extraction is considered an interim use, significant and sensitive natural heritage features and designated vulnerable areas, vulnerable surface water, vulnerable groundwater features and their hydrologic function are irreplaceable and the short to medium impacts on the environment should be considered when assessing an aggregate extraction proposal. HAPP recommends that proposed changes to policy 2.5.2.2 be removed.</p> <p>HAPP welcomes the addition of proposed PPS policies that acknowledge the need to prepare for and adapt to climate change. However, we note that with the welcomed addition of language about preparing for the impact of climate change there is a great opportunity as well</p>



	<p>to add/or improve policies to address climate change mitigation to reduce greenhouse gas levels through the use of green infrastructure, sustainable housing and renewable energy systems. These additional policy changes are necessary for the Province to lower its emissions, preserve air quality, and meet its targets and objectives as outlined in the “Preserving and Protecting our Environment for Future Generations, A made-in-Ontario Environment Plan”. These policy changes will also reflect and respond to the growing public concern over climate change impacts and the need to identify it as a priority issue (as highlighted in Halton through the multiple climate change declarations: Burlington – April 23; Halton Hills – May 6; Oakville – June 24; and Milton – July 22).</p>
<p>4 Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?</p>	<p>Halton’s planning partners suggest putting more emphasis on prioritizing affordable and sustainable housing as important policy considerations in addressing the housing shortage and affordability crisis in the Region.</p>
<p>5 Are there other tools that are needed to help implement the proposed policies?</p>	<p>Additional tools are required including:</p> <ul style="list-style-type: none"> <li>- updated guidelines related to protecting public health and safety from natural hazards – in particular, updated technical guidelines related to flood and erosion hazards are needed.</li> <li>- define terminology and clarify guidance to help implement many updated policies, including: <ul style="list-style-type: none"> <li>• 1.1.1.b, 1.1.3.8, 1.3.1.c, 1.4.3 and 1.7.1.b - need for definition and clarity for undefined proposed market-related references;</li> <li>• 1.1.2 - need for provincial guidelines as proposed to help assess land needs;</li> <li>• 1.1.3.8.e - need for clarity about provincial guidelines referenced as part of the agricultural impact test for comprehensive review settlement area expansion;</li> <li>• 1.2.2 - need for Province to provide consistent guidelines for municipal consultation with Indigenous communities;</li> <li>• 1.2.4.a – need for Provincial guidelines as proposed in reference to population, housing and employment projection allocation;</li> <li>• 1.2.6.1 – need for Province to update provincial land use compatibility guidelines with respect to planning and development of major facilities and sensitive land uses;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• 2.3.2 – Clarify what is meant by “provincial standards” for designating prime agricultural areas and specialty crop areas;</li> <li>• 2.3.3.1 – Clarify in policy that Provincial criteria with respect to agriculture-related and on-farm diversified uses are provided in Province’s Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas;</li> <li>• 2.3.6.2 – Clarify MDS guidelines address impacts from new or expanding non-agricultural uses; and</li> <li>• 4.9 – Clarify what specific guidelines are proposed to monitor Official plan implementation.</li> </ul> <ul style="list-style-type: none"> <li>- There also numerous pre-existing guidelines that need to be updated such as: The Natural Heritage Reference Manual and Natural hazard-related technical guidelines (specifically geared to the PPS which are complementary and supportive of CA regulations).</li> <li>- Definitions of “Adjacent lands”, “Freight supportive”, “Major goods movement facilities and corridors”, “MDS formulae”, “major corridors”, “prime agricultural areas”, “Protected heritage property”, “Specialty crop area”, “transit supportive”, A clear definition and potential criteria and guidance for terms such as “market-based needs”, “mix of residential types.”</li> </ul> <p>In addition, to support and supplement the PPS, Halton recommends that the Province provides the following tools:</p> <ul style="list-style-type: none"> <li>- A guideline to assist municipalities in addressing climate change through land use planning instruments such as official plans and planning tools.</li> <li>- More incentives for small businesses and the residential markets are needed to encourage those sectors to increase their energy conservation/efficiency and convert to low carbon technologies (EVs, etc.).</li> <li>- Changes to the Ontario Building Code relating to requirements for accessible housing as it relates to low rise/single detached/townhouse forms of development.</li> </ul>
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**Table 2:** Proposed changes to PPS policies. Policies that are not proposed to be changed or renumbered have not been included:

Proposed Changes – PPS, 2019		
Section	Policy	Proposed Consolidated Comments
<b>Part I</b>	<b>Preamble</b>	
	The Provincial Policy Statement provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy- led planning system, the Provincial Policy Statement sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for all Ontarians.	Comment deleted and replaced by comments below (where appropriate)
	The Provincial Policy Statement provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment. The Provincial Policy Statement supports improved land use planning and management, which contributes to a more effective and efficient land use planning system.	
	The policies of the Provincial Policy Statement may be complemented by provincial plans or by locally-generated policies regarding matters of municipal interest. Provincial plans and municipal official plans provide a framework for comprehensive, integrated, place-based and long-term planning that supports and integrates the principles of strong	

	communities, a clean and healthy environment and economic growth, for the long term.	
	<u>Municipal official plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning. Official plans shall identify provincial interests and set out appropriate land use designations and policies.</u>	HAPP welcomes the added statement to emphasize the importance of official Plans in implementing the PPS, however it is important that they are maintained as part of Section 4 “Implementation and Interpretation” section of the PPS to ensure they are interpreted as directive implementation policies and not vision statements.
	<u>Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement.</u>	<p>HAPP welcomes the added statement to emphasize the importance of the use of official plans to coordinate cross-boundary matters, however:</p> <ol style="list-style-type: none"> <li>1- It is important that it maintained as part of Section 4 “Implementation and Interpretation” to ensure that it is interpreted as directive policy and not a vision statement.</li> <li>2- The statement should be modified to substitute “shall” in lieu of a “should” language in order to enforce such coordination.</li> </ol> <p>HAPP recommends that the statement be modified as follows:</p> <p><u>Official plans <del>should</del> <b>shall</b> also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas. In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement.</u></p>
	<u>Zoning and development permit by-laws are also important for implementation of this Provincial Policy Statement. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and this Provincial Policy Statement.</u>	<p>HAPP welcomes the added statement, however it is important that it is maintained as part of Section 4 “Implementation and Interpretation” to ensure it is interpreted as implementation policy directive and not a vision statement.</p> <p>HAPP also recommends the use of the term “Community Planning Permit” in lieu of “Development Permit” to be consistent with other provincial plans and regulations.</p>

	Land use planning is only one of the tools for implementing provincial interests. A wide range of legislation, regulations, policies and programs may <del>also</del> <u>apply to decisions with respect to Planning Act applications and</u> affect planning matters, and assist in implementing these interests.	
	<u>In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply. In addition to land use approvals under the Planning Act, infrastructure may also require approval under other legislation and regulations. An environmental assessment process may be applied to new infrastructure and modifications to existing infrastructure under applicable legislation.</u>	
	<u>There may be circumstances where land use approvals under the Planning Act may be integrated with approvals under other legislation, for example, integrating the planning processes and approvals under the Environmental Assessment Act and the Planning Act, provided the intent and requirements of both Acts are met.</u>	
	<u>Within the Great Lakes – St. Lawrence River Basin, there may be circumstances where planning authorities should consider agreements related to the protection or restoration of the Great Lakes – St. Lawrence River Basin. Examples of these agreements include Great Lakes agreements between Ontario and Canada, between Ontario and Quebec and the Great Lakes States of the United States of America, and between Canada and the United States of America.</u>	HAPP welcomes the added statement, however it is important that is maintained as part of Section 4 “Implementation and Interpretation” to ensure it is interpreted as a implementation policy directive and not a vision statement.
<b>Part II</b>	<b>Legislative Authority</b>	

	The Provincial Policy Statement is issued under the authority of section 3 of the Planning Act and came into effect on <del>April 30, 2014</del> <u>&lt;DATE&gt;</u> .	
	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.	
	<u>Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government “shall be consistent with” this Provincial Policy Statement.</u>	
<b>Part III</b>	<b>How to Read the Provincial Policy Statement</b>	
	<b>Relationship with Provincial Plans</b>	
	<u>The Provincial Policy Statement provides overall policy directions on matters of provincial interest related to land use planning and development in Ontario, and applies province-wide, except where this policy statement or another provincial plan provides otherwise.</u>	
	Provincial plans, such as the Greenbelt Plan, <del>the</del> <u>A Place to Grow</u> : Growth Plan for the Greater Golden Horseshoe and the Growth Plan for Northern Ontario, build upon the policy foundation provided by the Provincial Policy Statement. They provide <u>additional</u> land use planning policies to address issues facing specific geographic areas in Ontario.	
	Provincial plans are to be read in conjunction with the Provincial Policy Statement. They take precedence over the policies of the Provincial Policy Statement to the extent of any conflict,	

	except where the relevant legislation provides otherwise.	
	<u>Where the policies of provincial plans address the same, similar, related, or overlapping matters as the policies of the Provincial Policy Statement, applying the more specific policies of the provincial plan satisfies the more general requirements of the Provincial Policy Statement. In contrast, where matters addressed in the Provincial Policy Statement do not overlap with policies in provincial plans, the policies in the Provincial Policy Statement must be independently satisfied.</u>	
	Land use planning decisions made by municipalities, planning boards, the Province, or a commission or agency of the government must be consistent with the Provincial Policy Statement. Where provincial plans are in effect, planning decisions must conform or not conflict with them, as the case may be.	
<b>Part IV</b>	<b>Vision for Ontario's Land Use Planning System</b>	
	The long-term prosperity and social well-being of Ontario depends upon planning for strong, sustainable and resilient communities for people of all ages, a clean and healthy environment, and a strong and competitive economy.	
	Ontario is a vast province with diverse urban, rural and northern communities which may face different challenges related to diversity in population, economic activity, pace of growth and physical and natural conditions. Some areas face challenges related to maintaining population and diversifying their economy, while other areas face challenges related to accommodating and managing the development and population growth which is	

	occurring, while protecting important resources and the quality of the natural environment.	
	<p><del>Ontario The Province</del>'s rich cultural diversity is one of its distinctive and defining features. <del>The Provincial Policy Statement reflects Ontario's diversity</del> <u>Indigenous communities have a unique relationship with the land and its resources</u>, which <del>includes</del> <u>continues to shape the histories history</u> and <del>cultures</del> <u>economy</u> of <del>Aboriginal peoples</del>, and <del>is based on good land use planning principles that apply in communities across Ontario</del> <u>the Province today</u>. Ontario recognizes the unique role <u>Indigenous communities have in land use planning and development, and the contribution of Indigenous communities' perspectives and traditional knowledge to land use planning decisions</u>. The Province recognizes the importance of consulting with Aboriginal communities on planning matters that may affect their <del>rights and interests</del>. <u>section 35 Aboriginal or treaty rights</u>. <u>Planning authorities are encouraged to build constructive, cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes and inform decision-making</u>.</p>	<p>HAPP welcomes the emphasis on the importance and value of the unique role Indigenous communities play in land use planning and development.</p> <p>There is, however, a need for provincial guidance on what will be expected through consultation and what applications will require consultation with Indigenous communities.</p> <p>HAPP recommends that the Province develop consultation guidelines for municipal engagement with Indigenous communities to meet this policy requirement under the PPS.</p> <p>HAPP also recommends using consistency terminology within the statement by using the term "Indigenous" in lieu of "Aboriginal."</p> <p>HAPP recommends the following modifications to address the comments above :</p> <p><del>Ontario The Province</del>'s rich cultural diversity is one of its distinctive and defining features. <del>The Provincial Policy Statement reflects Ontario's diversity</del> <u>Indigenous communities have a unique relationship with the land and its resources</u>, which <del>includes</del> <u>continues to shape the histories history</u> and <del>cultures</del> <u>economy</u> of <del>Aboriginal peoples</del>, and <del>is based on good land use planning principles that apply in communities across Ontario</del> <u>the Province today</u>. Ontario recognizes the unique role <u>Indigenous communities have in land use planning and development, and the contribution of Indigenous communities' perspectives and traditional knowledge to land use planning decisions</u>. The Province recognizes the importance of consulting with <del>Indigenous</del> <u>Aboriginal</u> communities, <b><u>in accordance with the provincial guidelines</u></b>, on planning matters that may affect their <del>rights and interests</del>. <u>section 35 Aboriginal or treaty rights</u>. <u>Planning authorities are encouraged to build constructive, cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes and inform decision-making</u>.</p>



	<p>The Provincial Policy Statement focuses growth and development within urban and rural settlement areas while supporting the viability of rural areas. It recognizes that the wise management of land use change may involve directing, promoting or sustaining development. Land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns and avoiding significant or sensitive resources and areas which may pose a risk to public health and safety. <u>Planning authorities are encouraged to permit and facilitate a range of housing options, including new development as well as residential intensification, to respond to current and future needs.</u></p>	<p>HAPP supports the addition of language to encourage planning authorities to permitting a range of housing options which aligns with the policies in A place to Grow: Growth Plan. We also recommend the addition of the terms “energy efficient and sustainable” to support sustainable forms of housing:</p> <p>HAPP recommends the following modifications to the proposed policy:  <u>Planning authorities are encouraged to permit and facilitate a range of energy efficient and sustainable housing options, including residential intensification as well as new development, to respond to the current and future needs of communities.</u></p>
	<p>Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They <del>also</del> support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. <u>They also permit better adaptation and response to the impacts of a changing climate, which will vary from region to region.</u> Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change</p>	

	<p>The Province's natural heritage resources, water resources, including the Great Lakes, agricultural resources, mineral resources, and cultural heritage and archaeological resources provide important environmental, economic and social benefits. The wise use and management of these resources over the long term is a key provincial interest. The Province must ensure that its resources are managed in a sustainable way to conserve biodiversity, protect essential ecological processes and public health and safety, provide for the production of food and fibre, minimize environmental and social impacts, <u>provide for recreational opportunities (e.g. fishing, hunting and hiking)</u> and meet its long-term needs. It is equally important to protect the overall health and safety of the population. The Provincial Policy Statement directs development away from areas of natural and human- made hazards. 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>	
<b>1.0</b>	<b>Building Strong Healthy Communities</b>	
<b>1.1</b>	<b>Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns</b>	
1.1.1	Healthy, liveable and safe communities are sustained by:	
	a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;	<p>HAPP supports the policy but recommends additional language to clarifying what is meant by "efficient development".</p> <p>HAPP proposes the following policy modifications:</p>

		<p>promoting efficient development and land use patterns, <b><u>such as compact built form and energy efficient and transit supportive development</u></b>, which sustain the financial well-being of the Province and municipalities over the long term;</p>
	<p>b) accommodating an appropriate <b><u>market-based</u></b> range and mix of residential <b><u>types</u></b> (including <b><u>single-detached, additional residential second units, multi-unit housing</u></b>, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p>	<p>HAPP emphasizes the need to provide a clear definition of “market-based” as well as guidelines as to how market-based-needs are quantified, evaluated and implemented in planning decisions.</p> <p>In the absence of a definition of “market-based”, and to avoid listing certain housing and employment types while omitting others, HAPP recommends the following policy modifications:</p> <p>“accommodating an appropriate <b><u>market-based</u></b> range and mix of <b><u>housing options and densities</u></b>, employment, institutional, recreation, park and open space, and other uses to meet long-term needs;</p> <p>In the alternative, if market references are to remain in the PPS, it is recommended that the policies be structured to make it clear that market based factors are one of many that need to be considering in arriving at good planning decisions.</p>
	<p>c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;</p>	
	<p>d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;</p>	
	<p>e) promoting <b><u>the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve</u></b> cost-effective development</p>	<p>Since optimization of transit investment is included in the definition of transit-supportive development, HAPP proposes the following modification to simplify the statement:</p>

	patterns, <u>optimization of transit investments</u> , and standards to minimize land consumption and servicing costs;	promoting <u>the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve</u> cost-effective development patterns, <u>optimization of transit investments</u> and standards to minimize land consumption and servicing costs;
	f) improving accessibility for persons with disabilities and older persons by <del>identifying, preventing and removing</del> <u>addressing</u> land use barriers which restrict their full participation in society;	HAPP recommends keeping the terms previously used in the policy (identify, prevent and remove) as they align with the requirements of “Accessibility Standards” as defined in <i>the Accessibility for Ontarians with Disabilities Act</i> (AODA), Part III, section 6(a).  Ensuring improved accessibility throughout the Province is necessary in order to meet the Provincial requirement of the AODA by the deadline of 2025.  improving accessibility for persons with disabilities and older persons by <del>identifying, preventing and removing</del> <u>addressing</u> land use barriers which restrict their full participation in society;
	g) ensuring that necessary infrastructure, <del>electricity generation facilities and transmission and distribution systems</del> , and public service facilities are or will be available to meet current and projected needs; <del>and</del>	
	h) promoting development and land use patterns that conserve biodiversity; and	
	i) <del>consider</del> <u>preparing for</u> the <u>regional and local</u> impacts of a changing climate.	HAPP welcomes the strengthening of language related to climate change adaptation through the use of the term “preparing for”
	j)	HAPP recommends adding an additional clause that supports healthy and liveable communities:  <b>j) Providing opportunities for the development of renewable energy systems and green infrastructure.</b>

1.1.2	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 up to <del>20</del> 25 years, <u>informed by provincial guidelines</u> . However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.	
	Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.	
	Nothing in policy 1.1.2 limits the planning for infrastructure and public service facilities <u>and employment areas</u> beyond a <del>20</del> 25-year time horizon.	
1.1.3	<b>Settlement Areas</b>	
	Settlement areas are urban areas and rural settlement areas, and include cities, towns, villages and hamlets. Ontario's settlement areas vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of infrastructure available.	
	The vitality <u>and regeneration</u> of settlement areas is critical to the long-term economic prosperity of our communities. Development pressures and land use change will vary across Ontario. It is in the interest of all communities to use land and resources wisely, to promote efficient development patterns, protect resources, promote green spaces, ensure effective use of infrastructure and public service	

	facilities and minimize unnecessary public expenditures.	
1.1.3.1	Settlement areas shall be the focus of growth and development <del>and their vitality and regeneration shall be promoted.</del>	<p>HAPP recommends keeping the deleted parts of the policy as they echo and reinforce what has been stated in the preamble to ensure vitality and regeneration of settlement areas.</p> <p>Proposed change is as follows: Settlement areas shall be the focus of growth and development <b>and their vitality and regeneration shall be promoted.</b></p>
1.1.3.2	Land use patterns within <i>settlement areas</i> shall be based on:	
	a) densities and a mix of land uses which: a) efficiently use land and resources;	
	b) 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;	
	c) minimize negative impacts to air quality and climate change, and promote energy efficiency;	
	d) <u>prepare for the impacts of a changing climate;</u>	
	e) support <i>active transportation</i> ;	
	f) are <i>transit-supportive</i> , where transit is planned, exists or may be developed; and	
	g) are <i>freight-supportive</i> ; <del>and.</del>	
	<u>Land use patterns within settlement areas shall also be based on</u> a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.	

1.1.3.3	<p>Planning authorities shall identify appropriate locations and promote opportunities for <u>transit-supportive development, accommodating a significant supply and range of housing options through</u> intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>	<p>HAPP welcomes the added flexibility the policy offers planning authorities in promoting transit supportive redevelopment. However, it is unclear what constitutes a ‘<b>significant</b>’ supply and range of housing options especially since the proposed PPS indicates that housing options includes low density residential typologies that may not be able to create the pattern and form of development to support and transit.</p> <p>HAPP suggests also including the term “mix of uses “to the policy to further support intensification, as modified below:</p> <p>Planning authorities shall identify appropriate locations and promote opportunities for <u>transit-supportive development, accommodating a mix of uses and a significant supply and range of housing options through</u> intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>
	<p><del>Intensification and redevelopment 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.</del></p>	<p>HAPP recommends keeping this policy as it ensures that intensification and development is done in a comprehensive way that protects the public’s health and safety and ensures the wise use and management of resources. Maintaining this policy will further support policy 4.2 which states “The Provincial Policy Statement shall be read in its entirety and all relevant policies are to be applied to each situation.”</p>
1.1.3.6	<p>New development taking place in <i>designated growth areas</i> should occur adjacent to the existing built-up area and <del>shall</del> <u>should</u> have a compact form, mix of uses and densities that allow for the efficient use of land, <i>infrastructure</i> and <i>public service facilities</i>.</p>	<p>HAPP recommends that the policy be modified to substitute the less directive “should” language with the existing PPS, 2014 language directive “shall” language to minimize impacts on finite prime agricultural lands, to accommodate growth through compact form patterns of development within existing settlement areas, and to ensure efficient use of lands and infrastructure and public service facilities.</p> <p>HAPP proposes the following modification to the proposed policy:</p> <p>New development taking place in <i>designated growth areas</i> should occur adjacent to the existing built-up area and <del>shall</del> <u>should</u> have a compact</p>

		form, mix of uses and densities that allow for the efficient use of land, <i>infrastructure</i> and <i>public service facilities</i> .
1.1.3.7	Planning authorities <del>shall</del> <u>should</u> establish and implement phasing policies to ensure:	<p>HAPP recommends keeping the “shall” in lieu of the “should” as phasing policies are the main way to ensure orderly development and a vital tool to effectively plan infrastructure and ensure full optimization of infrastructure investments.</p> <p>HAPP proposes the following modification to the proposed policy:</p> <p>Planning authorities <del>shall-should</del> establish and implement phasing policies to ensure:</p>
	a) that specified targets for intensification and redevelopment are achieved prior to, or concurrent with, new development within designated growth areas; and	
	b) the orderly progression of development within designated growth areas and the timely provision of the infrastructure and public service facilities required to meet current and projected needs.	
1.1.3.8	A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:	



<p>a) sufficient opportunities <del>for</del> <u>to accommodate</u> growth <u>and to satisfy market demand</u> are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;</p>	<p>HAPP raises concerns over the introduction of “market demand” as a factor for the expansion of the settlement area without providing a definition of what market demands are, how to evaluate them, and who monitors and provides accurate measurements of such factors.</p> <p>HAPP recommends the following policy modification:</p> <p>sufficient opportunities <del>for</del> <u>to accommodate</u> growth <del>and to satisfy market demand are</del> not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;</p>
<p>b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;</p>	
<p>c) in prime agricultural areas:</p> <ol style="list-style-type: none"> <li>1. the lands do not comprise specialty crop areas;</li> <li>2. alternative locations have been evaluated, and <ol style="list-style-type: none"> <li>i. there are no reasonable alternatives which avoid prime agricultural areas; and</li> <li>ii. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;</li> </ol> </li> </ol>	
<p>d) the new or expanding settlement area is in compliance with the minimum distance separation formulae; and</p>	

<p>e) <u>impacts</u> from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area <u>are avoided, and where avoidance is not possible, impacts are minimized</u> and mitigated to the extent feasible <u>in accordance with provincial guidelines. In undertaking a comprehensive review the level of detail of the assessment should correspond with the complexity and scale of the settlement boundary expansion or development proposal.</u></p>	<p>HAPP does not support the proposed additions to the policy in the absence of a definition of “scale” and “complexity” and how they should be evaluated. A misinterpretation of the proposed policy may lead to incremental encroachment on finite agricultural and resource based lands outside of the settlement boundary.</p> <p>HAPP recommends the following modification:  <u>impacts</u> from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area <u>are avoided, and where avoidance is not possible, impacts are minimized</u> and mitigated to the extent feasible <u>in accordance with provincial guidelines.</u></p> <p>HAPP also highlights the importance of the reference to the provincial guidelines in this policy. We assume that this guideline reference is specific to the draft Agricultural Impact Assessment Guidelines that were released by the Province for public comment in March of 2018 but not finalized. We strongly encourage the Province to finalize these guidelines to assist municipalities in implementing this policy.</p>
<p><del>In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.</del></p>	<p>HAPP recommends maintaining this policy as it provides important reference to sections 2 and 3 of the PPS. Comprehensive review of Natural Heritage, Water and Hazards should be part of the assessment when determining the most appropriate direction for expansion to the boundaries of settlement areas or the identification of a settlement area. Furthermore, keeping this policy will further support policy 4.2 which states “The Provincial Policy Statement shall be read in its entirety and all relevant policies are to be applied to each situation.”</p>

1.1.3.9	<p><u>Notwithstanding policy 1.1.3.8, municipalities may permit adjustments of settlement area boundaries outside a comprehensive review provided:</u></p>	<p>HAPP supports the inclusion of this policy which provides limited flexibility to address the need for a settlement area boundary expansion outside of a municipal comprehensive review. However, HAPP recommends that, similarly to A Place to Grow: Growth Plan, 2019:</p> <ol style="list-style-type: none"> <li>1- An explicit reference to exclude the Greenbelt lands from any expansion be added to the policy (See added point c).</li> <li>2- The policy should be aligned with section 2.2.8.4 of the to A Place to Grow: Growth Plan.</li> </ol> <p>HAPP recommends that the proposed policy be modified as follows:</p> <p><u>Notwithstanding policy 1.1.3.8, municipalities may <b>adjust</b> settlement area boundaries outside a comprehensive review provided</u></p>
	a) <u>there would be no net increase in land within the settlement areas;</u>	
	b) <u>the adjustment would support the municipality's ability to meet intensification and redevelopment targets established by the municipality;</u>	
	c) <u>The affected settlement areas are not in the Greenbelt Area;</u>	<p>HAPP strongly supports this policy addition as an explicit reference to exclude the Greenbelt lands from any expansion.</p> <p><b><u>The affected settlement areas are not in the Greenbelt Area;</u></b></p>
	d) <u>prime agricultural areas are addressed in accordance with 1.1.3.8 (c), (d) and (e); and</u>	<p>HAPP proposes this following modification to help clarify implementation of this policy:</p> <p><b><u>Impacts to prime agricultural areas are addressed in accordance with 1.1.3.8 (c), (d) and (e); and</u></b></p>
	e) <u>The adjustment includes an assessment of the impacts on Natural Heritage and hazards in accordance with sections 2.1,2.2, 3.1 and 3.2.</u>	<p>HAPP recommends this addition as this policy does not include requirements for a natural heritage or natural hazard assessment in support of a proposal to adjust settlement area boundaries</p>

		<b><u>The adjustment includes an assessment of the impacts on Natural Heritage and hazards in accordance with sections 2.1,2.2, 3.1 and 3.2.</u></b>
	f) <u>the settlement area to which lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands.</u>	
<b>1.1.5</b>	<b>Rural Lands in Municipalities</b>	
1.1.5.2	On rural lands located in municipalities, permitted uses are:	
	a) the management or use of resources;	
	b) resource-based recreational uses (including recreational dwellings);	
	c) limited residential development;	
	d) home occupations and home industries;	
	e) cemeteries; and	
	f) other rural land uses.	
	<u>Agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be promoted and protected in accordance with provincial standards.</u>	HAPP recommends this this policy clause be identified as by distinct letter (g), in keeping with the policy sequence, for ease of use and referencing.
<del>1.1.5.8</del>	<del>Agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be promoted and protected in accordance with provincial standards.</del>	
<u>1.1.5.8</u>	<u>New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.</u>	

1.2	Coordination	
	A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies and boards including:	
	a) managing and/or promoting growth and development <u>that is integrated with infrastructure planning;</u>	
	b) economic development strategies;	
	c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;	
	d) infrastructure, <del>electricity generation facilities and transmission and distribution systems,</del> multimodal transportation systems, public service facilities and waste management systems;	<p>HAPP recommends the addition of a reference to renewable energy systems since the definition of infrastructure does not include one.</p> <p>HAPP proposes the following modification to the proposed policy:</p> <p>infrastructure, <u>renewable energy systems</u> <del>electricity generation facilities and transmission and distribution systems,</del> multimodal transportation systems, public service facilities and waste management systems;</p>
	e) ecosystem, shoreline, watershed, and Great Lakes related issues;	
	f) natural and human-made hazards;	
	g) population, housing and employment projections, based on <i>regional market areas</i> ; and	

	h) addressing housing needs in accordance with provincial policy statements such as the <del>Ontario Housing</del> Policy Statement: <u>Service Manager Housing and Homelessness Plans.</u>	
1.2.2	Planning authorities <del>are encouraged to shall</del> <u>engage with Indigenous communities and</u> coordinate <u>on land use</u> planning matters <del>with</del> <u>Aboriginal communities.</u>	<p>In keeping with the comment in Part IV, “Vision for Ontario’s Land Use Planning System”, HAPP welcomes the emphasis on the importance and value of the unique role Indigenous communities play in land use planning and development.</p> <p>There is, however, a need for provincial guidance on what will be expected through consultation and what applications will require consultation with Indigenous communities.</p> <p>HAPP recommend that the province develops consultation guidelines so that there is a mutual understanding of what constitutes meaningful engagement with Indigenous communities.</p> <p>HAPP proposes the following policy modifications:  Planning authorities <del>are encouraged to shall</del> <u>engage with Indigenous communities and</u> coordinate <u>on land use</u> planning matters <del>with</del> <u>Aboriginal communities in accordance with the provincial guidelines.</u></p>
1.2.4	Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall:	
	a) identify, <del>coordinate</del> and allocate population, housing and employment projections for lower-tier municipalities. Allocations and projections by upper-tier municipalities shall be based on and reflect provincial plans where these exist <u>and informed by provincial guidelines;</u>	<p>HAPP recommends maintaining the term “coordinate” as it is necessary to allow lower- and upper-tier to jointly work to manage the growth of the Region and implement its vision and objectives.</p> <p>identify, <del>coordinate</del> and allocate population, housing and employment projections for lower-tier municipalities. Allocations and projections by upper-tier municipalities shall be based on and reflect provincial plans where these exist <u>and informed by provincial guidelines;</u></p> <p>In addition, HAPP recommends the Province clarify the provincial guidelines referenced in the policy. Is the reference meant for the Land Needs Assessment or guidelines yet to be developed?</p>

	b) identify areas where growth or development will be directed, including the identification of nodes and the corridors linking these nodes;	
	c) identify targets for intensification and redevelopment within all or any of the lower-tier municipalities, including minimum targets that should be met before expansion of the boundaries of settlement areas is permitted in accordance with policy 1.1.3.8;	
	d) where <u>major</u> transit corridors exist or are to be developed, identify density targets for areas adjacent or in proximity to these corridors <u>and stations</u> , including minimum targets that should be met before expansion of the boundaries of settlement areas is permitted in accordance with policy 1.1.3.8; and	HAPP welcomes the emphasis on identifying targets along transit corridor and around stations but it would be helpful to define “major transit corridors” and stations, are these meant to signify the same as the “priority transit corridor” and “Major Transit Station” in the Greater Golden Horseshoe as defined in the A place to Grow: The Growth Plan, 2019.
	e) <del>identify and</del> provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries.	
1.2.6.1	<p><i>Major facilities and sensitive land uses <del>should</del> <u>shall</u> be planned <del>to ensure they are appropriately designed, buffered and/or separated from each other and developed to prevent</del> <u>avoid</u>, or <u>if avoidance is not possible, minimize and</u> mitigate <u>any potential</u> adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term <u>operational and economic</u> viability of <i>major facilities</i> in <u>accordance with provincial guidelines, standards and procedures.</u></i></p>	<p>HAPP supports the strengthening of this policy but has the following recommendations:</p> <ol style="list-style-type: none"> <li>1- Maintaining the references to buffering and separation distances, which were tools to protect sensitive uses and restricted the development of major facilities.</li> <li>2- Providing more guidance on how minimizing adverse effects from such uses can be achieved.</li> <li>3- Maintaining the term “prevent” as is means measures will be taken to ensure that some adverse effects are prevented, where warranted.</li> </ol> <p><i>Major facilities and sensitive land uses <del>should</del> <u>shall</u> be planned <b>to ensure they are appropriately designed, buffered and/or separated from each other and developed to prevent</b> <u>avoid</u>, or <u>if avoidance is not possible, minimize and</u> mitigate <u>any potential</u> adverse effects from</i></p>

		odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term <u>operational and economic</u> viability of <i>major facilities</i> in <u>accordance with provincial guidelines, standards and procedures.</u>
<u>1.2.6.2</u>	<u>Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall ensure that the planning and development of sensitive land uses adjacent to existing or planned industrial, manufacturing, or other uses that are particularly vulnerable to encroachment are only permitted if:</u>	
	a) <u>alternative locations for the proposed sensitive land uses have been evaluated and there are no reasonable alternative locations; and</u>	
	b) <u>potential impacts of these uses are minimized and mitigated in accordance with provincial guidelines, standards and procedures.</u>	
<b>1.3</b>	<b>Employment</b>	
1.3.1	Planning authorities shall promote economic development and competitiveness by:	
	a) providing for an appropriate mix and range of employment <del>and</del> , institutional, <u>and mixed</u> uses to meet long-term needs;	
	b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;	



	c) <u>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;</u>	HAPP recognizes the need to identify strategic sites to maintain a sustainable employment site supply, however, clarification is needed as to how it should be implemented. 1.3.1.c seems more appropriate for economic development strategies especially as the proposed policy introduces market based terminology identified through sections 1.1.1.b, 1.1.3.8 and 1.2.g.
	d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, <u>with consideration of housing policy 1.4;</u> and	
	e) ensuring the necessary <i>infrastructure</i> is provided to support current and projected needs.	
<b>1.3.2</b>	<b>Employment Areas</b>	
<u>1.3.2.2</u>	<u>At the time of the official plan review or update, planning authorities should assess <i>employment areas</i> identified in local official plans to ensure that this designation is appropriate to the planned function of the employment area.</u>	HAPP notes that the use of term “local” official plans in this policy can be interpreted as either a geographic characteristic (regional vs. local) or to mean a lower-tier official plan which would exclude upper-tier municipalities from reviewing their employment areas as identified in their official Plans. Therefore, HAPP recommends the Province clarifies the intent behind the term “local” which this policy.
	<u><i>Employment areas</i> planned for industrial and manufacturing uses shall provide for separation or mitigation from <i>sensitive land</i> uses to maintain the long-term operational and economic viability of the planned uses and function of these areas.</u>	HAPP recommends this this section be given a distinct number for ease of use and referencing.

1.3.2.3	<u>Within <i>employment areas</i> planned for industrial and manufacturing uses, planning authorities shall prohibit residential and institutional uses that are not ancillary to the primary employment uses in order to maintain land use compatibility.</u>	
	<u>Employment areas planned for industrial and manufacturing uses, should include an appropriate transition to adjacent non-employment areas.</u>	While HAPP agrees with the need to separate industrial and manufacturing uses from adjacent non-employment uses, it is recommended the province provide more guidance as to what the transition area would be and what uses, if any, would be permitted on it.
1.3.2.2 1.3.2.4	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.	
1.3.2.5	<u>Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally-significant by a regional economic development corporation working together with affected upper- and single-tier municipalities and subject to the following:</u>	<p>This proposed policy seeks to align the PPS with policy 2.2.5.10 of the Growth plan in offering a window of opportunity for conversions outside of the upper-tier municipal comprehensive review process. It introduces, however, a non-defined regulatory body “a regional economic development corporation” to play a role in decision-making about the significance and location of “regionally-significant” employment areas as well as helping to decide how these lands should be converted. Regional staff do not support the reference “a regional economic development corporation” playing a role in decision-making as this authority rests with municipal council.</p> <p>Regional staff recommend that the policy be modified to remove reference to a “regional economic development corporation” as follows:</p> <p><u>Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified</u></p>

		<u>as provincially significant through a provincial plan exercise <del>or as regionally significant by a regional economic development corporation working together with affected upper- and single-tier municipalities</del> and subject to the following:</u>
	a) <u>there is an identified need for the conversion and the land is not required for employment purposes over the long term;</u>	
	b) <u>the proposed uses would not adversely affect the overall viability of the employment area; and</u>	
	c) <u>existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.</u>	
<del>1.3.2.3</del> 1.3.2.6	Planning authorities shall protect <i>employment areas</i> in proximity to <i>major goods movement facilities and corridors</i> for employment uses that require those locations.	
<del>1.3.2.4</del> 1.3.2.7	Planning authorities may plan beyond <del>20</del> 25 years for the long-term protection of employment areas provided lands are not designated beyond the planning horizon identified in policy 1.1.2.	
<b>1.4</b>	<b>Housing</b>	
1.4.1	To provide for an appropriate range and mix of <i>housing types options</i> and densities required to meet projected requirements of current and future residents of the <i>regional market area</i> , planning authorities shall:	<p>HAPP notes that given the provided definition for Housing Options which does not include tenure, it is recommended to add the term tenure in the policy. This will help bridge the gap between the PPS and the A place to Grow: Growth Plan, which in section 2.2.6 (1) a) ii indicates the need to establish rental housing targets to allow the Province to meet its rental supply needs.</p> <p>The following is the proposed modification:</p>

		To provide for an appropriate range and mix of <i>housing types options, tenures</i> and densities required to meet projected requirements of current and future residents of the <i>regional market area</i> , planning authorities shall:
	a) maintain at all times the ability to accommodate residential growth for a minimum of <del>10</del> 12 years through <i>residential intensification</i> and <i>redevelopment</i> and, if necessary, lands which are <i>designated and available</i> for residential development; and	HAPP recommends maintaining the PPS 2014 time frames as they are sufficient in Halton's context.
	b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate <i>residential intensification</i> and <i>redevelopment</i> , and land in draft approved and registered plans.	
	<u>Upper-tier and single-tier municipalities may choose to maintain land with servicing capacity sufficient to provide at least a five-year supply of residential units available through lands suitably zoned to facilitate <i>residential intensification</i> and <i>redevelopment</i>, and land in draft approved and registered plans.</u>	HAPP recommends maintaining the 3 years minimum as this sufficiently discretionary to enable Halton to plan beyond that, if necessary.
1.4.3	Planning authorities shall provide for an appropriate range and mix of <i>housing types options</i> and densities to meet projected <del>requirements</del> <i>market-based needs</i> of current and future residents of the <i>regional market area</i> by:	HAPP suggests modifying the policy to address the following concerns: <ul style="list-style-type: none"> <li>1- including rental housing in the policy through the addition of the word "tenure" to align with the A place to Grow: Growth Plan, which in section 2.2.6 (1) a) ii.</li> <li>2- Consistent with sections 1.1.1.b, 1.1.3.8, 1.2.g and 1.3.1.c a definition of "market-base needs" is required in order to provide a standardized evaluation of these needs and an adequate</li> </ul>

		<p>response to them. In the absence of a definition, the terms should be removed.</p> <p>Proposed modifications:</p> <p>Planning authorities shall provide for an appropriate range and mix of housing <del>types</del> <u>options</u>, <del>tenures</del> and densities to meet projected <del>market-based</del> <u>needs</u> of current and future residents of the <i>regional market area</i> by:</p> <p>In the alternative, if market references are to remain in the PPS, it is recommended that the policies be structured to make it clear that market based factors are one of many that need to be considering in arriving at good planning decisions.</p>
	<p>a) establishing and implementing minimum targets for the provision of housing which is <i>affordable to low and moderate income households</i> <u>and which aligns with applicable housing and homelessness plans</u>. 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>b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>1. all <del>forms of</del> housing <u>options</u> required to meet the social, health, <u>economic</u> and well-being requirements of current and future residents, including <i>special needs</i> requirements <u>and needs arising from demographic changes and employment opportunities</u>; and</li> <li>2. all <del>forms</del> <u>types</u> of <i>residential intensification</i>, including <del>second</del> <u>additional residential</u></li> </ol>	<p>HAPP has the following comments on changes to this policy:</p> <ol style="list-style-type: none"> <li>1- Consistent with comment 1 on section 1.4.3 HAPP would like to see tenure added to the statement.</li> <li>2- There is also a need to encourage the development of energy efficient housing types.</li> <li>3- Clarification is required on what is meant by economic needs as well as needs arising from demographic changes and employment opportunities.</li> <li>4- If the addition of “<u>additional residential</u>” is to align the PPS with recent change to the planning act section 16(3) then the term should be defined and italicized in this document.</li> </ol>

<p>units, and <i>redevelopment</i> in accordance with policy 1.1.3.3;</p>	<p>To address the aforementioned comments, HAPP proposes the following modifications to the policy:</p> <p>b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>1. all <del>forms of</del> housing <u>options and tenures</u> required to meet the social, health, <u>economic</u> and well- being requirements of current and future residents, including <del>special needs requirements and needs arising from demographic changes and employment opportunities</del>; and</li> <li>2. all <del>forms</del> <u>types</u> of <i>residential intensification</i>, including <del>second additional residential</del> units, and <i>redevelopment</i> in accordance with policy 1.1.3.3;</li> <li>3. <u>Energy efficient housing options.</u></li> </ol>
<p>c) directing the development of new housing towards locations where appropriate levels of <i>infrastructure</i> and <i>public service facilities</i> are or will be available to support current and projected needs;</p>	<p>HAPP recommends the following modifications to promote climate change mitigation in this policy:</p> <p>c) directing the development of new housing towards locations where appropriate levels of <i>infrastructure</i>, <u>renewable energy systems</u> and <i>public service facilities</i> are or will be available to support current and projected needs;</p>
<p>d) 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 transit in areas where it exists or is to be developed;</p>	

	<p>e) <u>requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and</u></p>	<p>HAPP has the following comments on this policy:</p> <ol style="list-style-type: none"> <li>1- Removing the section, "<u>including potential air rights development, in proximity to transit, including corridors and stations;</u>" as it is already part of the definition of "Transit-Supportive Development".</li> <li>2- Recommend adding a definition of "Air Right Development" to the PPS.</li> </ol> <p>To address these comments, HAPP recommends the following policy modification:  <u>e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and</u></p>
	<p>f) establishing development standards for <i>residential intensification, redevelopment</i> and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.</p>	
<b>1.6</b>	<b>Infrastructure and Public Service Facilities</b>	
1.6.1	<p><del>Infrastructure, electricity generation facilities and transmission and distribution systems,</del> and <i>public service facilities</i> shall be provided in <del>a coordinated,</del> <u>an</u> efficient <del>and cost-effective</del> manner that <del>considers</del> <u>prepares for the</u> impacts <del>from of a</del> <u>changing</u> climate <del>change</del> while accommodating projected needs.</p>	<p>Since infrastructure planning and implementation offer a great opportunity to lower greenhouse gas emissions and mitigate against climate change impacts, HAPP recommends strengthening this policy through additional modifications that address mitigation:</p> <p><i>Infrastructure and public service facilities</i> shall be provided in <u>an</u> efficient manner that <del>considers</del> <u>mitigates climate change and prepares for the</u> <del>its</del> impacts <del>from of a climate change change</del> while accommodating projected needs.</p>
	<p>Planning for <del>infrastructure, electricity generation facilities and transmission and distribution systems,</del> and <i>public service facilities</i> shall be coordinated</p>	

	and integrated with land use planning <u>and growth management</u> so that they are:	
	a) financially viable over their life cycle, which may be demonstrated through asset management planning; and	
	b) available to meet current and projected needs.	
<b>1.6.6</b>	<b>Sewage, Water and Stormwater</b>	
1.6.6.1	Planning for <i>sewage and water services</i> shall:	
	a) <del>direct and</del> accommodate <del>expected</del> <u>forecasted</u> growth <del>or development</del> in a manner that promotes the efficient use and optimization of existing: <ol style="list-style-type: none"> <li><i>municipal sewage services and municipal water services</i>; and</li> <li><i>private communal sewage services and private communal water services</i>, where <i>municipal sewage services and municipal water services</i> are not available <u>or feasible</u></li> </ol>	HAPP recommends maintaining the term “ <b>direct</b> ” as it reinforces planning authorities’ ability to plan for and distribute growth in an efficient way and make best use of their existing infrastructure.
	b) ensure that these systems are provided in a manner that: <ol style="list-style-type: none"> <li>can be sustained by the water resources upon which such services rely;</li> <li><u>prepares for the impacts of a changing climate</u>;</li> <li>is feasible, <u>and</u> financially <u>viable</u> <del>and</del> <del>complies with all regulatory requirements over their lifecycle</del>; and</li> <li>protects human health <u>and safety</u>, and the natural environment;</li> </ol>	
	2. promote water conservation and water use efficiency;	



	<p>3. integrate servicing and land use considerations at all stages of the planning process; and</p>	<p>HAPP proposes the following modification:</p> <p>integrate servicing and land use considerations at all stages of the planning process <b>and ensure sewage and water infrastructure is in place and provides sufficient capacity to support planned growth;</b> and</p>
	<p>4. be in accordance with the servicing hierarchy outlined through policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5. <u>For clarity, where municipal sewage services and municipal water services are not available, planned or feasible, planning authorities have the ability to consider the use of the servicing options set out through policies 1.6.6.3, 1.6.6.4, and 1.6.6.5 provided that the specified conditions are met.</u></p>	
1.6.6.2	<p><i>Municipal sewage services and municipal water services are the preferred form of servicing for settlement <u>areas to support protection of the environment and minimize potential risks to human health and safety.</u> <del>Intensification and redevelopment</del> Within settlement areas <del>on</del> with existing municipal sewage services and municipal water services <del>should</del>, <u>intensification and redevelopment shall</u> be promoted, wherever feasible <u>to optimize the use of the services.</u></i></p>	<p>HAPP proposes the following modification to the policy.</p> <p><i>Municipal sewage services and municipal water services are the preferred form of servicing for settlement <u>areas to support protection of the environment and minimize potential risks to human health and safety.</u> <del>Intensification and redevelopment</del> Within settlement areas <del>on</del> with existing municipal sewage services and municipal water services <del>should</del>, <u>intensification and redevelopment shall</u> be promoted, wherever feasible <u>to optimize the use of the these services.</u></i></p>
1.6.6.3	<p><i>Where municipal sewage services and municipal water services are not <del>provided</del> <u>available</u>, <del>municipalities may allow the use of</del> planned or feasible private communal sewage services and private communal water services <u>are the preferred</u></i></p>	<p>Please provide a definition of “Multi-unit/lot” to clarify the intent of the policy.</p> <p>HAPP suggests the following modification to the proposed policy:</p>

	<u>form of servicing for multi- unit/lot development to support protection of the environment and minimize potential risks to human health and safety.</u>	Where <i>municipal sewage services</i> and <i>municipal water services</i> are not <del>provided</del> <u>available</u> , <del>municipalities may allow the use of</del> planned or feasible <i>private communal sewage services</i> and <i>private communal water services</i> are the preferred form of servicing for multi- unit/lot development to support protection of the environment and minimize potential risks to human health and safety. <u>provided that site conditions are suitable for the long-term provision of such services with no negative impacts.</u>
1.6.6.4	Where <i>municipal sewage services</i> and <i>municipal water services</i> or <i>private communal sewage services</i> and <i>private communal water services</i> are not <del>provided</del> <u>available, planned or feasible</u> , <i>individual on-site sewage services</i> and <i>individual on-site water services</i> may be used provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i> . In settlement areas, <del>these</del> <u>individual on-site sewage services and individual on-site water</u> services may <del>only</del> be used for infilling and minor rounding out of existing development.	
	<u>At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the character of rural settlement areas. Where planning is conducted by an upper-tier municipality, the upper-tier municipality should work with lower- tier municipalities at the time of the official plan review or update to assess the long-term impacts of individual on-site sewage services and individual on- site water services on the environmental health and the desired character of rural settlement areas and the feasibility of other forms of servicing set out in policies 1.6.6.2 and 1.6.6.3.</u>	HAPP proposes the following modifications to this new proposed policy to provide municipalities with the discretion of whether or not investigate the feasibility of providing other forms of servicing to rural settlements, based on factors including financial, growth management and environmental considerations.  <u>At the time of the official plan review or update, planning authorities may choose to</u> assess the long-term impacts of individual on-site sewage services and individual on-site water services on the environmental health and the character of rural settlement areas. Where planning is conducted by an upper-tier municipality, the upper-tier municipality should work with lower- tier municipalities at the time of the official plan review or update to assess the long-term impacts of individual on-site sewage services and individual on- site water services on the environmental health and the desired character of rural settlement areas

		<u>and the feasibility of other forms of servicing set out in policies 1.6.6.2 and 1.6.6.3.</u>
1.6.6.5	<i>Partial services</i> shall only be permitted in the following circumstances:	HAPP requires clarification as to whether this policy applies to rural areas broadly or within settlement areas only.
	a) where they are necessary to address failed <i>individual on-site sewage services</i> and <i>individual on-site water services</i> in existing development; or	
	b) within <i>settlement areas</i> , to allow for infilling and minor rounding out of existing development on <i>partial services</i> provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i> .	
	<u>Where <i>partial services</i> have been provided to address failed services in accordance with subsection (a), infilling on existing lots of record in rural areas in municipalities may be permitted where this would represent a logical and financially viable connection to the existing <i>partial service</i> and provided that site conditions are suitable for the long-term provision of such services with no <i>negative impacts</i>. In accordance with subsection (a), the extension of <i>partial services</i> into rural areas is only permitted to address failed <i>individual on-site sewage</i> and <i>individual on-site water services</i> for existing development.</u>	HAPP requires the term “infill” to be defined similarly to the term “Intensification” in order to accurately interpret the policy.
1.6.6.7	Planning for stormwater management shall:	
	a) <u>be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;</u>	
	b) minimize, or, where possible, prevent increases in contaminant loads;	

	c) minimize <u>erosion and</u> changes in water balance, and <del>erosion</del> <u>prepare for the impacts of a changing climate through the effective management of stormwater</u> ;	HAPP proposes the following modifications to respond to the impacts of climate change:  minimize <u>erosion and</u> changes in water balance, and <del>erosion</del> <u>prepare for the impacts of a changing climate through the effective management of stormwater use of green stormwater infrastructure</u> ;
	d) <del>not increase</del> <u>mitigate</u> risks to human health <del>and</del> , safety <del>and</del> , property damage <u>and the environment</u> ;	The proposed policy seems to suggest that development may increase risk to health and safety through stormwater management provided those risks are mitigated. The policy should be clear that planning for stormwater management shall not increase risks to human health, safety, property damage or the environment.  HAPP recommends that “ <del>not increase</del> ” be maintained rather than amending with proposed text “mitigate”.  <del>not increase</del> <u>mitigate</u> risks to human health <del>and</del> , safety <del>and</del> , property damage <u>and the environment</u> ;
	e) maximize the extent and function of vegetative and pervious surfaces; and	HAPP suggests the following modification:  maximize the extent and function of <del>vegetative and pervious surfaces</del> <u>green infrastructure</u> ; and
	f) promote stormwater management best practices, including stormwater attenuation and re-use, <u>water conservation and efficiency</u> , and low impact development.	
<b>1.6.7</b>	<b>Transportation Systems</b>	
1.6.7.2	Efficient use <del>shall</del> <u>should</u> be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	HAPP recommends maintaining the term “ <u>shall</u> ”, given the importance of efficient infrastructure planning and to remain consistent with the PPS policy of “promoting efficient development and land use patterns which sustain the well-being of the province and municipalities over the long term.”.  HAPP also recommends the addition of the following to the policy:

		<p>Proposed addition:</p> <p>Efficient use <del>shall</del> <u>should</u> be made of existing and planned infrastructure, including <u>active transportation and transit as well as</u> through the use of transportation demand management strategies, where feasible.</p>
<del>1.6.7.5</del>	<del>Transportation and land use considerations shall be integrated at all stages of the planning process.</del>	HAPP recommends keeping this policy. The integration of transportation and land use policies through all stages of the planning process is vital to ensure that the transportation needs of the community will be met.
<b>1.6.8</b>	<b>Transportation and Infrastructure Corridors</b>	
<u>1.6.8.5</u>	<u>The co-location of linear <i>infrastructure</i> should be promoted, where appropriate.</u>	
<del>1.6.8.5</del> <u>1.6.8.6</u>	When planning for corridors and rights-of-way for significant transportation, electricity transmission, and <i>infrastructure facilities</i> , consideration will be given to the significant resources in Section 2: Wise Use and Management of Resources.	
<b>1.6.10</b>	<b>Waste Management</b>	
1.6.10.1	<i>Waste management systems</i> need to be provided that are of an appropriate size and type to accommodate present and future requirements, and facilitate, encourage and promote reduction, reuse and recycling objectives. <del>Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion.</del>	HAPP recommends maintain the existing wording because it is unclear what benefit there is in removing the last sentence.
<b>1.6.11</b>	<b>Energy Supply</b>	
1.6.11.1	Planning authorities should provide opportunities for the development of energy supply including	HAPP recommends the following policy modification:

	electricity generation facilities and transmission and distribution systems, <u>district energy, and renewable energy systems and alternative energy systems</u> to accommodate current and projected needs.	Planning authorities <del>shall should</del> provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, <u>district energy, and renewable energy systems and alternative energy systems</u> to accommodate current and projected needs.
1.6.11.2	<del>Planning authorities should promote renewable energy systems and alternative energy system, where feasible, in accordance with provincial and federal requirements.</del>	
<b>1.7</b>	<b>Long-Term Economic Prosperity</b>	
1.7.1	Long-term economic prosperity should be supported by:	
	a) <u>promoting</u> opportunities for economic development and community investment-readiness;	
	b) <u>encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;</u>	<p>HAPP recommends defining the term “market-based needs” as it has been used throughout the document and requires a precise definition.</p> <p>HAPP recommends replacing residential uses with residential development to make the statement clearer.</p> <p>Given the reference to a “diverse workforce” it is recommended to include rental options to provide housing affordability and enable labour mobility.</p> <p>Based on the comments above, HAPP recommends the following modifications:</p> <p><u>encouraging residential uses to <del>respond to dynamic market-based needs and</del> provide necessary housing supply and range of housing options and tenures for a diverse workforce;</u></p>

		In the alternative, if market references are to remain in the PPS, it is recommended that the policies be structured to make it clear that market based factors are one of many that need to be considering in arriving at good planning decisions.
	c) optimizing the long-term availability and use of land, resources, <i>infrastructure</i> , <del>electricity generation facilities and transmission and distribution systems</del> , and <i>public service facilities</i> ;	
	d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;	
	e) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including <i>built heritage resources</i> and <i>cultural heritage landscapes</i> ;	
	f) promoting the redevelopment of <i>brownfield sites</i> ;	
	g) providing for an efficient, cost-effective, reliable <i>multimodal</i> transportation system that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support the movement of goods and people;	
	h) providing opportunities for sustainable tourism development;	HAPP recommends modifying the proposed policy to reference agri-tourism:  providing opportunities for sustainable tourism and <u>agri-tourism</u> development;
	i) <u>sustaining and enhancing the viability of the agricultural system through protecting</u>	

	<p><u>agricultural resources, minimizing land use conflicts</u>, providing opportunities to support local food, and <del>promoting</del> <u>maintaining and improving</u> the <del>sustainability of agri-food network and agri-product businesses by protecting agricultural resources, and minimizing land use conflicts</del>;</p>	
	<p>j) promoting energy conservation and providing opportunities for <del>development of renewable</del> <u>increased</u> energy <del>supply systems and alternative energy systems, including district energy</del>;</p>	HAPP recommends keeping the policy unchanged as language to encourage (and ideally prioritize) sustainable and resilient energy systems should be retained, in keeping with policy 1.6.11.1. Energy sustainability/resiliency is a key component of adapting to the impacts of a changing climate
	<p>k) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature; and</p>	
	<p>l) encouraging efficient and coordinated communications and telecommunications infrastructure.</p>	
<b>1.8</b>	<b>Energy Conservation, Air Quality and Climate Change</b>	
1.8.1	<p>Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and <u>preparing for impacts of a changing climate change adaptation</u> through land use and development patterns which:</p>	<p>HAPP proposes the following changes to allow the province to meet its GHG targets as per the Preserving and Protecting our Environment, A made-in-Ontario Environment Plan.</p> <p>HAPP recommends the following modifications:</p> <p>Planning authorities shall support <b>local renewable energy generation</b>, energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and <u>preparing for impacts of a changing climate adaptation</u> through land use and development patterns which:</p>
	<p>a) promote compact form and a structure of nodes and corridors;</p>	



	b) promote the use of <i>active transportation</i> and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas;	
	c) focus major employment, commercial and other travel-intensive land uses on sites which are well served by transit where this exists or is to be developed, or designing these to facilitate the establishment of transit in the future;	
	d) focus freight-intensive land uses to areas well served by major highways, <i>airports, rail facilities</i> and <i>marine facilities</i> ;	
	e) <u>encourage transit-supportive development and intensification to</u> improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion;	
	f) promote design and orientation which <u>maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and</u> <del>1. —maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and</del> <del>2. maximizes opportunities for the use of renewable energy systems and alternative energy systems; and</del>	HAPP suggests the following modifications to address climate change:  promote design and orientation which <u>maximizes local renewable energy generation, energy efficiency and conservation, and considers the mitigating effects of vegetation; and</u>
	g) maximize vegetation within <i>settlement areas</i> , where feasible.	
2.0	Wise Use and Management of Resources	
2.1	Natural Heritage	

2.1.10	<u>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.</u>	<p>HAPP raises two main concerns with the proposed policy:</p> <ul style="list-style-type: none"> <li>(a) the word manage can be open to interpretations and should be substituted by the more specific terms: “maintain, restore or, where possible, improve”</li> <li>(b) there is a reference to provincial guidelines which do not yet exist or may be subject to change.</li> </ul> <p>In light of the above concerns, HAPP proposes the following modification:</p> <p><u>Municipalities may choose to <del>manage</del> maintain, restore or, where possible, improve wetlands not subject to policy 2.1.4 and 2.1.5, in accordance with guidelines developed by the Province.</u></p>
<b>2.2</b>	<b>Water</b>	
2.2.1	Planning authorities shall protect, improve or restore the quality and quantity of water by:	
	a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;	
	b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts;	
	c) <u>evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level;</u>	HAPP supports including this provision as it enhances the requirement for planning authorities to evaluate and prepare for the impacts of a changing climate when dealing with water resources.
	d) identifying water resource systems consisting of ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline	

	areas, which are necessary for the ecological and hydrological integrity of the watershed;	
	e) maintaining linkages and related functions among ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas;	
	f) implementing necessary restrictions on development and site alteration to: <ol style="list-style-type: none"> <li>1. protect all municipal drinking water supplies <i>and designated vulnerable areas</i>; and</li> <li>2. protect, improve or restore vulnerable surface and ground water, sensitive surface water features and sensitive ground water features, and their hydrologic functions;</li> </ol>	
	g) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality;	
	h) ensuring consideration of environmental lake capacity, where applicable; and	
	i) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.	
<b>2.3</b>	<b>Agriculture</b>	
2.3.2	Planning authorities shall designate prime agricultural areas and specialty crop areas in accordance with guidelines developed by the Province, as amended from time to time.	

	<u>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.</u>	
<b>2.3.3</b>	<b>Permitted Uses</b>	
2.3.3.3	New land uses, <u>in prime agricultural areas</u> , including the creation of lots, and new or expanding livestock facilities shall comply with the minimum distance separation formulae.	
<b>2.3.6</b>	<b>Non-Agricultural Uses in Prime Agricultural Areas</b>	
2.3.6.1	Planning authorities may only permit non-agricultural uses in prime agricultural areas for:	
	a) extraction of minerals, petroleum resources and mineral aggregate resources, <del>in accordance with policies 2.4 and 2.5</del> ; or	HAPP recommends keeping the references to the sections 2.4 and 2.5 as they still relevant to Prime Agricultural Lands.  Proposed modification:  extraction of minerals, petroleum resources and mineral aggregate resources, <b>in accordance with policies 2.4 and 2.5</b> ; or
	b) limited non-residential uses, provided that all of the following are demonstrated: 1. the land does not comprise a specialty crop area; <del>2. the proposed use complies with the minimum distance separation formulae;</del> 2. there is an identified need within the planning horizon provided for in policy 1.1.2 for additional land <del>to be designated</del> to accommodate the proposed use; and	

	<p>3. alternative locations have been evaluated, and</p> <p>i. there are no reasonable alternative locations which avoid prime agricultural areas; and;</p> <p>ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.</p>	
2.3.6.2	<p>Impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be <u>avoided, and where avoidance is not possible, minimized and</u> mitigated to the extent feasible <u>and informed by provincial guidelines.</u></p>	<p>HAPP recommends the following change for added clarity of interpretation:</p> <p>Impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be <u>avoided, and where avoidance is not possible, minimized and</u> mitigated to the extent feasible <u>and informed by provincial guidelines Agriculture Impact Assessment guidelines.</u></p>
2.3.6.3	<p><b><u>Ground-mounted solar facilities are permitted in prime agricultural areas and specialty crop areas only as on-farm diversified uses.</u></b></p>	<p>The following section is moved from the definition of On-Farm Diversified Uses. HAPP recommends making this a policy instead of part of a definition:</p> <p><b><u>Ground-mounted solar facilities are permitted in prime agricultural areas and specialty crop areas only as on-farm diversified uses.</u></b></p>
<b>2.5</b>	<b>Mineral Aggregate Resources</b>	
<b>2.5.2</b>	<b>Protection of Long-Term Resource Supply</b>	
2.5.2.1	<p>As much of the <i>mineral aggregate resources</i> as is realistically possible shall be made available as close to markets as possible.</p> <p>Demonstration of need for mineral aggregate resources, including any type of supply/demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.</p>	<p>Proponents should be required by PPS to demonstrate the need for any additional supply of aggregate resources. HAPP recommends that the policy be modified to require a needs test as follows:</p> <p>As much of the <i>mineral aggregate resources</i> as is realistically possible shall be made available as close to markets as possible.</p> <p>Demonstration of need for <i>mineral aggregate resources</i>, including any type of supply/demand analysis, shall <del>not</del> be required, <del>notwithstanding</del></p>

		<del>the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.</del>
2.5.2.2	<p>Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts.</p> <p><u>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.</u></p>	<p>This policy is concerning as it introduces consideration for extraction in natural heritage features (outside of the Greenbelt) provided that the long-term rehabilitation can demonstrate no-negative impacts on the natural feature and its ecological function. Aggregate extraction operations, although considered an interim use, may be in operation for decades. The proposed policy change permits mineral aggregate extraction in natural heritage features such as significant woodlands, fish habitat, and habit of endangered and threatened species provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions. This would appear to allow extraction within some of the most significant and sensitive natural heritage features without having to demonstrate “no negative impact” to these features until rehabilitation has commenced. Also, the proposed policy has no regard for hydrological features and functions that play an important role in these sensitive habitats nor for the connectivity between habitats and features. Rehabilitation, for most “below the water table” quarry operations, never returns the affected site to a similar state of features and functionality as they are most likely to become aquatic habitats as opposed to terrestrial habitats, especially in Halton Region. Claiming that an aquatic habitat will replace the previous terrestrial habitat in functionality and connectivity, most likely will not meet the “no negative impact” test.</p> <p><b>The addition of this policy is not supported and it must be removed.</b></p>

2.5.2.4	Mineral aggregate operations shall be protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact. Existing mineral aggregate operations shall be permitted to continue without the need for official plan amendment, rezoning or development permit under the Planning Act. <u>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.</u> When a license for extraction or operation ceases to exist, policy 2.5.2.5 continues to apply.	
<b>2.6</b>	<b>Cultural Heritage and Archaeology</b>	
2.6.5	Planning authorities shall <u>engage with Indigenous communities and</u> consider <del>the their</del> interests <del>of Aboriginal communities in conserving when identifying, protecting and managing</del> cultural heritage and archaeological resources.	<p>As stated in Part IV of this document, HAPP welcomes the collaboration and participation of Indigenous communities in the planning and conservation processes, however we require the Province to provide guidelines as to how such collaboration should take place. Furthermore, given the definition of conserving which includes “identifying, protecting, managing and use of”, the proposed change is not required. Therefore, HAPP suggest the following modifications to the policy:</p> <p>Planning authorities shall <u>engage with Indigenous communities and</u> consider <del>the their</del> interests <del>of Aboriginal communities in conserving when identifying, protecting and managing</del> cultural heritage and archaeological resources in accordance with <u>Provincial Guidelines.</u></p>
<b>3.0</b>	<b>Protecting Public Health and Safety</b>	
	<u>(Note: policies in this section related to natural hazards are subject to ongoing review by the Province’s Special Advisor on flooding. Further</u>	HAPP would be pleased to provide comments on the ongoing review and proposed changes to Section 3.0 – Hazard in the PPS.

	<u>changes may be considered as a result of this review)</u>	
<b>3.1</b>	<b>Natural Hazards</b>	
3.1.3	Planning authorities shall <del>consider</del> <u>prepare for</u> the <del>potential</del> impacts of <u>a changing</u> climate <del>change</del> that may increase the risk associated with natural hazards.	HAPP supports the proposed changes to this policy.
<b>3.2</b>	<b>Human-Made Hazards</b>	
<u>3.2.3</u>	<u>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.</u>	HAPP provides the following modifications in order to align the policy with the provincial guidelines as a reference to the Excess Soil Best Management Practice Guide: <u>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 in accordance with provincial guidelines.</u>
<b>4.0</b>	<b>Implementation and Interpretation</b>	
4.1	This Provincial Policy Statement applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after <del>April 30, 2014</del> <u>&lt;DATE&gt;</u> .	
4.2	<del>In accordance with section 3 of the Planning Act, a decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Municipal Board, in respect of the exercise of any authority that affects a planning matter, "shall be consistent with" this Provincial Policy Statement.</del>	HAPP recommends keeping the original wording of this policy in PPS, 2014 as it places more emphasis on conforming to the PPS. The removal of the requirement "to be consistent with" is problematic, as it may lead to inconsistent application of PPS policies



	<p><del>Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government “shall be consistent with” this Provincial Policy Statement.</del></p> <p><u>This Provincial Policy Statement shall be read in its entirety and all relevant policies are to be applied to each situation.</u></p>	
4.4	<p>This Provincial Policy Statement shall be <del>read</del> <u>implemented</u> <del>in its entirety and all relevant policies are to be applied to each situation</del> <u>a manner that is consistent with Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms.</u></p>	
4.6	<p><del>This Provincial Policy Statement shall be implemented in a manner that is consistent with the Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms.</del></p>	
<del>4.7</del> <u>4.6</u>	<p>The official plan is the most important vehicle for implementation of this Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through official plans. Official plans shall identify provincial interests and set out appropriate land use designations and policies. To determine the significance of some natural heritage features and other resources, evaluation may be required.</p> <p><del>Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas.</del></p>	<p>HAPP does not support the proposed removal of the text related to cross boundary matters, as this policy supports the natural heritage and water policies that promote the management of natural resources using a “systems, cross-jurisdictional or watershed” approach.</p>

	In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement. The policies of this Provincial Policy Statement continue to apply after adoption and approval of an official plan	
4.7	<u>Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for local development by:</u>	HAPP proposes the following modifications that will provide flexibility to municipalities to create local processes to streamline applications.  <u>Planning authorities <del>shall</del> <b>should</b> take action to support increased housing supply and facilitate a timely and streamlined process for local development by:</u>
	a) <u>identifying and fast-tracking priority applications which support housing and job-related growth and development; and</u>	HAPP recommends the following changes to allow the province and municipalities to meet their needs of affordable housing options:  <u>identifying and fast-tracking priority applications which support <b>affordable</b> housing and job-related growth and development; and</u>
	b) <u>reducing the time needed to process residential and priority applications to the extent practical.</u>	HAPP recommends the following changes to allow the province and municipalities to meet their needs of affordable housing options:  <u>reducing the time needed to process <b>affordable</b> residential and priority applications to the extent practical.</u>
4.8	<del>Zoning and development permit by-laws are important for implementation of this Provincial Policy Statement. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and this Provincial Policy Statement.</del>	

4.9	<del>The policies of this Provincial Policy Statement represent minimum standards. This Provincial Policy Statement does not prevent planning authorities and decision-makers from going beyond the minimum standards established in specific policies, unless doing so would conflict with any policy of this Provincial Policy Statement.</del>	HAPP recommends maintaining this policy as it is important to allow planning authorities from exceeding the policies of the Provincial Policy Statement in protecting and effectively using their lands and resources.
4.10	<del>A wide range of legislation, regulations, policies, and plans may apply to decisions with respect to Planning Act applications. In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply.</del>	HAPP recommends maintaining this policy.
4.11	<del>In addition to land use approvals under the Planning Act, infrastructure may also require approval under other legislation and regulations. An environmental assessment process may be applied to new infrastructure and modifications to existing infrastructure under applicable legislation. There may be circumstances where land use approvals under the Planning Act may be integrated with approvals under other legislation, for example, integrating the planning processes and approvals under the Environmental Assessment Act and the Planning Act, provided the intent and requirements of both Acts are met.</del>	HAPP recommends maintaining this policy as we do not support the elimination of the EA process for changes to infrastructure or new infrastructure. This process functions to ensure that all issues are measured and mitigated.
4.12	<del>Provincial plans shall be read in conjunction with this Provincial Policy Statement and take precedence over policies in this Provincial Policy Statement to the extent of any conflict, except where establishing provincial plans provides otherwise. Examples of these are plans created under the Niagara Escarpment Planning and Development Act, the Ontario Planning and</del>	HAPP recommends maintaining this policy as it defines the hierarchy in the application of provincial plans in relationship to the provincial policy statement.

	<del>Development Act, 1994, the Oak Ridges Moraine Conservation Act, 2001, the Greenbelt Act, 2005 and the Places to Grow Act, 2005.</del>	
4.13	<del>Within the Great Lakes—St. Lawrence River Basin, there may be circumstances where planning authorities should consider agreements related to the protection or restoration of the Great Lakes—St. Lawrence River Basin. Examples of these agreements include Great Lakes agreements between Ontario and Canada, between Ontario, Quebec and the Great Lakes States of the United States of America, and between Canada and the United States of America.</del>	HAPP recommends maintaining this policy as it speaks to the cases when an agreement within the Great Lakes-St. Lawrence Basin is required.
4.14 4.8	The Province, in consultation with municipalities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies. The Province shall monitor their implementation, including reviewing performance indicators concurrent with any review of this Provincial Policy Statement.	HAPP would like to be engaged during this process, and to understand some of the KPIs that will be implemented into the provincial framework.
4.15 4.9	Municipalities are encouraged to <del>establish performance indicators to</del> monitor <u>and report on</u> the implementation of the policies in their official plans, <u>in accordance with any reporting requirements, data standards and any other guidelines that may be issued by the Minister.</u>	
6.0	Definitions	
	<b><u>Agricultural System:</u></b> <u>A system comprised of a group of inter-connected elements that collectively create a viable, thriving agricultural sector. It has two components:</u>	

	<p>a) <u>an agricultural land base comprised of prime agricultural areas, including specialty crop areas, and rural lands that together create a continuous productive land base for agriculture; and</u></p>	
	<p>b) <u>an agri-food network which includes infrastructure, services, and assets important to the viability of the agri-food sector.</u></p>	
	<p><b>Agri-food network:</b>  <u>Within the Agricultural System, a network that includes elements important to the viability of the agri-food sector such as regional infrastructure and transportation networks; on-farm buildings and infrastructure; agricultural services, farm markets, distributors, and primary processing; and vibrant, agriculture-supportive communities.</u></p>	
	<p><b>Areas of archaeological potential:</b>  means areas with the likelihood to contain archaeological resources. <del>Methods-Criteria</del> to identify archaeological potential are established by the Province, <del>but municipal approaches which achieve the same objectives may also be used.</del> The Ontario Heritage Act requires archaeological potential to be confirmed <u>by a licensed archaeologist</u> through archaeological <u>assessment and/or</u> fieldwork.</p>	<p>HAPP recommends keeping the language that allows municipalities to remain part of the process through the following modification:  means areas with the likelihood to contain archaeological resources. <del>Methods-Criteria</del> to identify archaeological potential are established by the Province, <b>but municipal approaches which achieve the same objectives may also be used.</b> The Ontario Heritage Act requires archaeological potential to be confirmed <u>by a licensed archaeologist</u> through archaeological <u>assessment and/or</u> fieldwork.</p>
	<p><b>Built heritage resource:</b>  means a building, structure, monument, installation or any manufactured <u>or constructed part or</u> remnant that contributes to a property's cultural heritage value or interest as identified by a community, including an <del>Aboriginal-Indigenous</del> community. <u>Most</u> built heritage resources are <del>generally</del> located on property that has been designated under Parts</p>	<p>HAPP recommends removing the last sentence, as there is no basis to assert that "most" built heritage resources have been proactively identified and protected through regulations by local, provincial, federal, and/or international registers. Ontario's heritage continues to evolve over time. It is quite possible that most built heritage resources have yet to be identified and/or recognized. Including this "most" statement in the PPS could have undesirable consequences of discounting the value of as-yet unidentified or unrecognized heritage resources.</p>

	IV or V of the <i>Ontario Heritage Act</i> , or <u>has been</u> included on local, provincial, <u>federal</u> and/or <del>federal</del> <u>international</u> registers.	<p>The definition would also benefit from a definition of the introduced term “constructed”.</p> <p>HAPP’s modifications to the definition are as follows:  <b>Built Heritage resource:</b></p> <p>means a building, structure, monument, installation or any manufactured <u>or constructed part or</u> remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an <del>Aberiginal-Indigenous</del> community. <del>Most built heritage resources are generally located on property that has been designated under Parts IV or V of the Ontario Heritage Act, or has been included on local, provincial, federal and/or federal international registers.</del></p>
	<p><b>Comprehensive review:</b> means</p> <p>a) for the purposes of policies 1.1.3.8, <u>1.1.3.9</u> and 1.3.2.2, an official plan review which is initiated by a planning authority, or an official plan amendment which is initiated or adopted by a planning authority, which:  [...]</p>	
	<p><b>Conserved:</b>  means the identification, protection, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained <del>under the Ontario Heritage Act</del> This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that <u>has been approved or adopted by the planning authority or decision-maker</u>. Mitigative measures and/or alternative development approaches can be included in these plans and assessments.</p>	<p>HAPP notes that it is concerned with the removal of the reference to the <i>Ontario Heritage Act</i> from the definition. The main statute used to “conserve” cultural heritage resources is now not referenced.</p>

	<p><b>Cultural heritage landscape:</b> means a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an <del>Aberiginal</del> <u>Indigenous</u> community. The area may <del>involve</del> <u>include</u> features such as <u>buildings</u>, structures, spaces, <u>views</u>, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association. <del>Examples may include, but are not limited to, heritage conservation districts designated</del> <u>Cultural heritage landscapes may be properties that have been determined to have cultural heritage value or interest</u> under the Ontario Heritage Act <del>villages, parks, gardens, battlefields, mainstreets and neighbourhoods, cemeteries, trailways, viewsheds, natural areas and industrial complexes of heritage significance; and areas recognized by, or have been included on</del> federal <u>and/or</u> international <del>designation authorities (e.g. a National Historic Site or District designation, or a UNESCO World Heritage Site)</del> <u>registers, or protected through official plan, zoning by-law, or other land use planning mechanisms.</u></p>	<p>The proposed changes produce a broader interpretation of the meaning of a cultural heritage landscape (i.e. not restricting one's understanding of a cultural heritage landscape to a few pre-identified examples).</p> <p>HAPP support this definition's recognition of "official plan, zoning by-law, or other land use planning mechanisms" as tools to protect cultural heritage landscapes, as such <i>Planning Act</i> mechanisms are becoming more commonly used to conserve cultural heritage landscapes in addition to those available under the <i>Ontario Heritage Act</i> (e.g. specific OP policies, secondary plans, etc.).</p> <p>The policy should be re-framed such that all the tools and mechanisms may be used, singly or in whatever combination is appropriate to conserve cultural heritage landscapes.</p>
	<p><b>Endangered species:</b> means a species that is <del>listed or categorized</del> <u>classified</u> as an "Endangered Species" on the <del>Ontario Ministry of Natural Resources'</del> <u>official</u> Species at Risk <u>in Ontario</u> List, as updated and amended from time to time.</p>	
	<p><b>Greenbelt Area:</b> <u>means the area identified in Ontario Regulation 59/05, as amended from time to time.</u></p>	
	<p><b>Habitat of endangered species and threatened species:</b></p>	

	<p>means <u>habitat within the meaning of Section 2 of the Endangered Species Act, 2007.</u></p> <p><del>a) with respect to a species listed on the Species at Risk in Ontario List as an endangered or threatened species for which a regulation made under clause 55(1)(a) is in force, the area prescribed by that regulation as the habitat of the species; or</del></p> <p><del>b) with respect to any other species listed on the Species at Risk in Ontario List as an endangered or threatened species, an area on which the species depends, directly or indirectly, to carry on its life processes, including life processes such as reproduction, rearing, hibernation, migration or feeding, as approved by the Ontario Ministry of Natural Resources; and</del></p> <p><del>places in the areas described in clause (a) or (b), whichever is applicable, that are used by members of the species as dens, nests, hibernacula or other residences.</del></p>	
	<p><b>Heritage attributes:</b></p> <p>means the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and <u>that must be retained. Attributes</u> may include the property's built, <u>constructed</u>, or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (<del>including e.g.</del> significant views or vistas to or from a protected heritage property)</p>	
	<p><b><u>Housing options:</u></b></p> <p><u>means a range of housing types such as, but not limited to single-detached, semidetached,</u></p>	<p>HAPP notes that the definition continues to exclude adequate rental housing from provincial interest related to land use planning and development, while adding four rarely used housing ownership models</p>



	<p><u>rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, multi- residential buildings and uses such as, but not limited to life lease housing, coownership housing, co-operative housing, community land trusts, affordable housing, housing for people with special needs, and housing related to employment, institutional or educational uses.</u></p>	<p>into provincial interests is a missed opportunity, since establishing rental targets is part of Section 2.2.6 (1) a) ii of the A place to Grow: Growth Plan.</p> <p>HAPP also recommends including adaptable and accessible housing as additional housing options and providing a definition for both.</p>
	<p><b><u>Impacts of a changing climate:</u></b>  <u>means the potential for present and future consequences and opportunities from changes in weather patterns at local and regional levels including extreme weather events and increased climate variability</u></p>	
	<p><b>Major facilities:</b>  means facilities which may require separation from sensitive land uses, including but not limited to airports, <u>manufacturing uses</u>, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities.</p>	
	<p><b>Municipal sewage services:</b>  means a sewage works within the meaning of section 1 of the Ontario Water Resources Act that is owned or operated by a municipality, <u>including centralized and decentralized systems.</u></p>	
	<p><b>Municipal water services:</b></p>	

	means a municipal drinking-water system within the meaning of section 2 of the Safe Drinking Water Act, 2002, <u>including centralized and decentralized systems.</u>	
	<p><b>Negative impacts:</b> means</p> <p>a) in regard to policy 1.6.6.4 and 1.6.6.5, <u>potential risks to human health and safety</u> and degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development. Negative impacts should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards;</p>	
	<p><b>On-farm diversified uses:</b> means uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, and uses that produce value-added agricultural products. <u>Ground-mounted solar facilities are permitted in prime agricultural areas and specialty crop areas only as on-farm diversified uses.</u></p>	<p>HAPP recommends deleting the last sentence as it has been proposed as a policy under section 2.3.6.3</p> <p>HAPP recommends revising the guidelines on permitted uses in Ontario to reflect the repeal of the Green Energy Act as well as any relevant amendments to the Planning Act, PPS and A place to Grow: Growth Plan.</p> <p>HAPP's proposes the following modification to the definition:</p> <p><b>On-farm diversified uses:</b> means uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri- tourism uses, <del>and</del> uses that produce value-added agricultural products <u>and renewable energy generation.</u></p>
	<b>Partial services:</b> means	

	<p>a) municipal sewage services or private communal sewage services <del>and</del> <u>combined with</u> individual on- site water services; or</p> <p>b) municipal water services or private communal water services <del>and-combined</del> <u>with</u> individual on-site sewage services.</p>	
	<p><b>Planned corridors:</b> means corridors or future corridors which are required to meet projected needs, and are identified through provincial plans, preferred alignment(s) determined through the Environmental Assessment Act process, or identified through planning studies where the Ontario Ministry of Transportation, <u>Metrolinx, Ontario Ministry of Energy, Northern Development and Mines or Independent Electricity System Operator (IESO) or any successor to those ministries or entities</u> is actively pursuing the identification of a corridor. Approaches for the protection of planned corridors may be recommended in guidelines developed by the Province.</p>	
	<p><b>Provincial and federal requirements:</b> means</p> <p><del>a) —in regard to policy 1.6.11.2, legislation, regulations, policies and standards administered by the federal or provincial governments for the purpose of protecting the environment from potential impacts associated with energy systems and ensuring that the necessary approvals are obtained;</del></p> <p>a) in regard to policy 2.1.6, legislation and policies administered by the federal or provincial governments for the purpose of fisheries protection (including fish and fish habitat), and related, scientifically</p>	

	<p>established standards such as water quality criteria for protecting lake trout populations; and</p> <p>b) in regard to policy 2.1.7, legislation and policies administered by the provincial government or federal government, where applicable, for the purpose of protecting species at risk and their habitat.</p>	
	<p><b>Public service facilities:</b> 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, recreation, police and fire protection, health and educational programs, <u>long-term care services</u>, and cultural services. Public service facilities do not include infrastructure.</p>	
	<p><b>Residential intensification:</b> means intensification of a property, site or area which results in a net increase in residential units or accommodation and includes:</p> <ul style="list-style-type: none"> <li>a) redevelopment, including the redevelopment of <i>brownfield sites</i>;</li> <li>b) the development of vacant or underutilized lots within previously developed areas;</li> <li>c) infill development;</li> <li>d) <u>development and introduction of new housing options within previously developed areas</u>;</li> <li>e) the conversion or expansion of existing industrial, commercial and institutional buildings for residential use; and</li> <li>f) the conversion or expansion of existing residential buildings to create new residential units or accommodation, including accessory apartments, <del>second</del></li> </ul>	

	<u>additional residential</u> units <del>and</del> , rooming houses, <u>and other housing options.</u>	
	<p><b>Regional market area:</b> refers to an area that has a high degree of social and economic interaction. The upper or single-tier municipality, or planning area, will normally serve as the regional market area. However, where a regional market area extends significantly beyond these boundaries, then the regional market area may be based on the larger market area. Where regional market areas are very large and sparsely populated, a smaller area, if defined in an official plan, may be utilized.</p>	
	<p><b>Significant:</b> means</p> <ul style="list-style-type: none"> <li>a) in regard to wetlands, coastal wetlands and areas of natural and scientific interest, an area identified as provincially significant by the Ontario Ministry of Natural Resources using evaluation procedures established by the Province, as amended from time to time;</li> <li>b) in regard to woodlands, an area which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or</li> </ul>	<p>HAPP is supportive with the proposed revisions to this part of the definition. As well, clear direction on how to apply O. Reg. 9/06, Criteria for determining Cultural Heritage Value or Interest would be welcome.</p>

	<p>due to the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history. These are to be identified using criteria established by the Ontario Ministry of Natural Resources;</p> <p>c) in regard to other features and areas in policy 2.1, ecologically important in terms of features, functions, representation or amount, and contributing to the quality and diversity of an identifiable geographic area or natural heritage system;</p> <p>d) in regard to mineral potential, an area identified as provincially significant through evaluation procedures developed by the Province, as amended from time to time, such as the Provincially Significant Mineral Potential Index; and</p> <p>e) in regard to cultural heritage and archaeology, resources that have been determined to have cultural heritage value or interest. <u>Processes for determining cultural heritage value or interest are established by the Province under the authority of the Ontario Heritage Act. National and international criteria are established by the certifying bodies.</u> <del>for the important contribution they make to our understanding of the history of a place, an event, or a people</del></p> <p>Criteria for determining significance for the resources identified in sections (c)- <del>(d)-(e)</del> are recommended by the Province, but municipal approaches that achieve or</p>	
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	<p>exceed the same objective may also be used.</p> <p>While some significant resources may already be identified and inventoried by official sources, the significance of others can only be determined after evaluation.</p>	
	<p><b>Special needs:</b> means any housing, including dedicated facilities, in whole or in part, that is used by people who have specific needs beyond economic needs, including but not limited to, needs such as mobility requirements or support functions required for daily living. Examples of special needs housing may include, but are not limited to, <u>long- term care homes, adaptable and accessible housing, and</u> housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for older persons.</p>	<p>HAPP recommends the following:</p> <ol style="list-style-type: none"> <li>1- Removing the added type (long-term care homes) to ‘special needs’ as it blurs the line between institutional medical care (traditional long-term care) and supported living that does not include 24 hour supports. This definition change will likely cause confusion in both land use designations in Official Plans and Zoning By Laws as it is redefining an institutional use as a residential use, while continuing to refer to long-term care as an institutional use in 1.1.1 b.</li> <li>2- Removing “adaptable and accessible housing” from the “Special Needs” definition and include them in the definition of “Housing Options.” “Special needs” in this case refers to people with complex health needs specifically group homes, supported residences, specialized residences and long-term care homes or a congregate housing arrangement where clients with disabilities or other unique conditions share personal care resources.</li> </ol> <p>HAPP’s proposes the following modifications to the definition:</p> <p><b>Special needs:</b> means any housing, including dedicated facilities, in whole or in part, that is used by people who have specific needs beyond economic needs, including but not limited to, needs such as mobility requirements or support functions required for daily living. Examples of special needs housing may include, but are not limited to, <del>long- term care homes, adaptable and accessible housing, and</del> housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for older persons.</p>

	<p><b>Threatened species:</b> means a species that is listed or <del>categorized</del> <u>classified</u> as a “Threatened Species” on the <del>Ontario Ministry of Natural Resources’ official</del> Species at Risk <u>in Ontario</u> List, as updated and amended from time to time.</p>	
	<p><b>Transit-supportive:</b> in regard to land use patterns, means development that makes transit viable, <u>optimizes investments in transit infrastructure</u>, and improves the quality of the experience of using transit. It often refers to compact, mixed-use development that has a high level of employment and residential densities, <u>including air rights development, in proximity to transit stations, corridors and associated elements within the transportation system</u>. Approaches may be recommended in guidelines developed by the Province or based on municipal approaches that achieve the same objectives.</p>	