Appendix 1: 2023 PPS vs 2024 PPS OPPI Comparison + Comment Acceptance

OPPI has attached a chart which outlines the comments its members made for its submission for the 2023 draft *Provincial Planning Statement*, comparing them to the updated 2024 draft *Provincial Planning Statement*. OPPI has also highlighted whether comments were accepted in the updated draft.

Sec	2023 PPS Version	Sec	2024 PPS Version	2023 OPPI Comments	Included?
2.1.1	At the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.	2.1.3	At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.	"At the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of <u>up to 30</u> at least 25 years , informed by provincial guidance . Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon."	YES
			Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.		
2.1.4	Planning authorities should support the achievement of <i>complete communities</i> by: a) accommodating an appropriate range and mix of land uses, <i>housing options</i> , transportation options with <i>multimodal</i> access, employment, <i>public service</i> <i>facilities</i> and other institutional uses (including, schools and associated child care facilities, long-term care facilities, places of worship and cemeteries),	2.1.6	Planning authorities should support the achievement of complete communities by: a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including, schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;	 This policy should retain the wording outlined in the Provincial Policy Statement, 2020 S.1.1.1 a) and c) to reflect: a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term. b) improving accessibility for persons with disabilities by addressing housing land use barriers which restrict their full participation in society. e) promoting the integration of land use planning, growth management, transit- 	NO

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	recreation, parks and open space, and other uses to meet long-term needs; b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.		 b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups. 	supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs".	
2.2.1 a)	Planning authorities shall provide for an appropriate range and mix of <i>housing options</i> and densities to meet projected needs of current and future residents of the <i>regional market</i> <i>area</i> by: a) coordinating land use planning and planning for housing with Service Managers to address the full range of <i>housing options</i> including housing affordability needs;	2.2.1. a)	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;	The term "Service Managers" is undefined in the current policy, and further clarity is needed to understand the intent as written.	YES Service managers is defined at this <u>link</u>
2.2.1 c)	c) promoting densities for new housing which efficiently use land, resources, <i>infrastructure</i> and <i>public service facilities</i> , and support the use of <i>active</i> <i>transportation</i> ; and	2.2.1. c)	c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and	This policy promotes density and the efficient use of land and other resources, which is supported by OPPI. However, also important is policy direction for the appropriate location of affordable housing options which can best meet the needs of those residents. An additional policy	Yes Addressed through 2.2.1 (c) and 2.2.1(d)

Sec	2023 PPS Version	Sec	2024 PPS Version	2023 OPPI Comments	Included?
				should require that affordable housing be located in proximity to existing and planned community facilities, transit infrastructure, and active transportation connections. Further direction on this matter would help to both strengthen the policy and help to create stronger communities.	
2.3.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	"Municipalities that contain urban settlement areas that are currently serviced and/or are planned to be serviced with municipal water and sewage services shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas where applicable."	NO An important issue which needs to be further addressed by the Province
2.3.2 b)	Land use patterns within settlement areas should be based on densities and a mix of land uses which: b) optimize existing and planned infrastructure and public service facilities;	2.3.1.2 b)	Land use patterns within settlement areas should be based on densities and a mix of land uses which: b) optimize existing and planned infrastructure and public service facilities;	A definition should be provided for "planned infrastructure and public service facilities" to provide clarity. Previous OLT and OMB hearings have focused on what constitutes "planned". The definition could incorporate criteria such as: inclusion in the municipal official plan, inclusion in the municipal 10-year capital works plan, as identified by the infrastructure provider, or has an approved environmental assessment.	Partial Public Service facility definition on PPS page 50.
2.3.3	Planning authorities should support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing	2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and	"Planning authorities <u>shall</u> should support general intensification and redevelopment <u>within the existing built up areas</u> to support the achievement of complete communities, including by planning for a range and mix of housing options, <u>establishing intensification</u>	Partial "shall" included

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	planning and investment in the necessary infrastructure and public service facilities.		investment in the necessary infrastructure and public service facilities.	strategies including targets for intensification and"	
2.3.4	In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities should consider the following: a) that there is sufficient capacity in existing or planned infrastructure and public service facilities; b) the applicable lands do not comprise specialty crop areas; c) the new or expanded settlement area complies with the minimum distance separation formulae; d) impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and e) the new or expanded settlement	2.3.2	In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following: a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses; b) if there is sufficient capacity in existing or planned infrastructure and public service facilities; c) whether the applicable lands comprise specialty crop areas; d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas; e) whether the new or expanded settlement area complies with the minimum distance separation formulae; f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact	"In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities <u>shall</u> should -consider the following <u>to support</u> growth within the planning horizon of an official plan:"	Partial "shall" included; new 2.3.2 a) added

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Sec	d) impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and	Sec	assessment or equivalent analysis, based on provincial guidance; and g) the new or expanded settlement area provides for the phased progression of urban development. c) whether the applicable lands comprise specialty crop areas; d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;	Adjust wording of d) to "alternatives should be considered which avoid, or where avoidance is not possible, mitigate impacts on prime agricultural lands and agricultural operations to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance".	YES
2.3.4 d)		2.3.4. c) – f)	 e) whether the new or expanded settlement area complies with the minimum distance separation formulae; f) whether impacts on the 		
			agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and		
2.3.4	In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities should consider the following	2.3.2.1	In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:	Add new requirement: <u>f) "that the land is</u> <u>needed to support growth identified in</u> <u>Policy 2.1.1"</u>	Partial "shall" and 2.3.2.1 a) added
		a)	a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;		

Sec	2023 PPS Version	Sec	2024 PPS Version	2023 OPPI Comments	Included?
2.3.5	Planning authorities are encouraged to establish density targets for new settlement areas or settlement area expansion lands, as appropriate, based on local conditions. Large and fast- growing municipalities are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare.	2.3.1.5	Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast- growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.	"Planning authorities <u>shall</u> are encouraged to establish density targets for new community areas in new settlement areas or settlement area expansion lands, as appropriate, based on local conditions. Large and fast-growing municipalities <u>shall</u> are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare" in new community areas. Large and fast-growing municipalities should also develop densities for new employment areas based on the anticipated market characteristics of these areas.	Partial
2.3.5	Planning authorities are encouraged to establish density targets for new settlement areas or settlement area expansion lands, as appropriate, based on local conditions. Large and fast- growing municipalities are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare.	2.3.1.5	Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast- growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.	Setting out a density target of 50 residents and jobs per gross hectare for settlement expansion areas is appropriate however direction needs to be provided on how that density is to be measured similar to Growth Plan Policy 2.2.7.3.	NO
2.4.1	To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed- use development, planning authorities may, and large and fast-growing municipalities shall, identify and focus growth and development in strategic growth areas by: a) identifying an appropriate minimum density target for each strategic growth area; and	2.4.1.2	To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned: a) to accommodate significant population and employment growth; b) as focal areas for education, commercial, recreational, and cultural uses; c) to accommodate and support the	Overall, the changes which further allow municipalities to direct growth to strategic growth areas are positive and support the planning of strong and sustainable communities. However, an unintended consequence of giving more municipal control and less provincial guidance on factors such as minimum density and intensification targets, compatible land uses, and identifying the appropriate scale of development in these <i>Strategic Growth</i> <i>Areas</i> may result in Councils not approving an appropriate level of density. Strong	NO

Sec	2023 PPS Version	Sec	2024 PPS Version	2023 OPPI Comments	Included?
Sec	2023 PPS Version b) identifying the appropriate type and scale of development General Comments See Page 8-9 of 2023 PPS	Sec	 2024 PPS Version transit network and provide connection points for inter-and intra- regional transit; and d) to support affordable, accessible, and equitable housing. Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by: a) planning for land uses and built form that supports the achievement of minimum density targets; and b) supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit supportive and promote complete communities. 	 2023 OPPI Comments provincial policies directing municipalities to appropriately intensify in strategic growth areas are essential for creating vibrant and complete communities, and avoiding local decisions based on external "not in my backyard" pressures. General Comment: Major Transit Station Areas (MTSAs) are an important part of building complete communities as they represent a chance to locate people and jobs adjacent to transit infrastructure. Growth Plan Policy 2.2.4.9 a) identified that MTSAs should include a mix of uses, including the provision for affordable housing. This policy from the Growth Plan should be carried over to the Provincial Planning Statement to ensure that growth around transit includes housing for all market segments. Additionally, integrating references to affordable housing in relation to MTSA growth is also important to recognize and seek to balance the displacing impacts that transit-oriented growth has on Indigenous, 	Included? Partial
				Black, and equity-deserving groups, as well as lower-income households, and renters. These groups are particularly vulnerable to land value speculation and physical development.	
2.5.2	When directing development in rural settlement areas in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.	2.5.2 2.5.3	 2.5.2 In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted. 2.5.3 When directing development in rural settlement areas in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural 	Section 1.1.4.2 of the Provincial Policy Statement states that rural settlement areas will be the focus of growth in rural areas. Re-including this policy in the Provincial Planning Statement will ensure sustainable and orderly growth in rural areas.	YES

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	Growth and development may be directed to <i>rural lands</i> in accordance with policy 2.6, including where a municipality does not have a <i>settlement area</i> .		characteristics, the scale of development and the provision of appropriate service levels. Growth and development may be directed to rural lands in accordance with policy 2.6, including where a municipality does not have a settlement area.		
2.6.1	On rural lands located in municipalities, permitted uses are: a) the management or use of resources; b) resource-based recreational uses (including recreational dwellings not intended as permanent residences); c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate sewage and water services; d) agricultural uses, agriculture- related uses, on-farm diversified uses and normal farm practices, in accordance with provincial standards; e) home occupations and home industries; f) cemeteries; and g) other rural land uses.	2.6.1	 On rural lands located in municipalities, permitted uses are: a) the management or use of resources; b) resource-based recreational uses (including recreational dwellings not intended as permanent residences); c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services; d) agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices, in accordance with provincial standards; e) home occupations and home industries; f) cemeteries; and g) other rural land uses. 	The <i>Provincial Planning Statement</i> states "On rural lands located in municipalities, permitted uses are:c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate sewage and water services. The inclusion of "multi-lot residential developments" enables the establishment of estate lots in rural areas, which threaten the viability of agricultural operations and enables rural sprawl. This reference should be removed.	Partial "multi-lot" excluded
2.6.2	Development that can be sustained by rural service levels should be promoted.	2.6.2	Development that can be sustained by rural service levels should be promoted.	Wording from the <i>Provincial Policy</i> <i>Statement section 1.1.5.4</i> which references "development that is compatible with the rural landscape" has been removed and	NO

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				should be retained to ensure growth is compatible with its unique and sensitive rural context.	
2.8.1.3	On lands for employment outside of employment areas, and taking into account the transition of uses to prevent adverse effects, a diverse mix of land uses, including residential, employment, public service facilities and other institutional uses shall be permitted to support the achievement of complete communities.	2.8.1.3 & 3.5.1 3.5.2	 2.8.1.3 - On lands for employment outside of employment areas, including on lands that provide for an appropriate transition of uses to prevent adverse effects, a diverse mix of land uses, including residential, employment, public service facilities and other institutional uses shall be permitted, in accordance with policy 3.5, to support the achievement of complete communities. 3.5.1 - Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures. 3.5.2 - Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that proposed adjacent sensitive land uses are only permitted if potential 	"On lands for employment outside of employment areas, and taking into account the transition of uses to prevent adverse effects, a diverse mix of land uses, including residential, employment, public service facilities and other institutional uses <u>should shall</u> be permitted to support the achievement of complete communities."	Partial Addressed in 3.5

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			impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.		
2.8.2	General Comments Page 12 of 2023 PPS	2.8.2	General Comments Page 13-14 of 2024 PPS	General Comment: As outlined in the Definitions section of the Provincial Planning Statement, the revised definition of Employment Areas removed "institutional and commercial, including retail and office not associated with the primary employment use listed above". These permitted land uses should be retained in employment areas. If removed, it has long-term implications for how municipalities plan for and protect these essential areas over time. Municipalities should retain the ability to protect these areas over the long term.	NO
2.9	General comments Page 13 of 2023 PPS	2.9	General comments Page 15 of 2024 PPS	General Comment: As the Province is aware of the human, financial impacts, and implications of a climate change, the proposed provincial policy changes have not addressed the expectation and opportunity to ensure planning for communities and growth supports not only the protection of important resources residents rely on. This includes access to drinking water, local food and natural assets, but also the design of accessible and sustainable spaces maximizing infrastructure investment and providing important activity and refuge, such as parks and open space. The <i>Provincial</i> <i>Planning Statement</i> should be enhanced to ensure resiliency is considered by more than	NO

Sec	2023 PPS Version	Sec	2024 PPS Version	2023 OPPI Comments	Included?
	Planning authorities shall plan to		Planning authorities shall plan to	 mainly greenhouse gas reduction, but also through actions such as community energy planning, climate change resilience for infrastructure, and long-term climate planning. b) incorporate climate risk considerations 	NO
2.9.1	reduce greenhouse gas emissions and prepare for the <i>impacts of a</i> <i>changing climate</i> through approaches that: a) support the achievement of compact, <i>transit-supportive</i> , and <i>complete communities</i> ; b) incorporate climate change considerations in planning for and the development of <i>infrastructure</i> , including stormwater management systems, and <i>public</i> <i>service facilities</i> ; c) support energy conservation and efficiency; d) promote green <i>infrastructure</i> , <i>low impact development</i> , and <i>active transportation</i> , protect the environment and improve air quality; and e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the <i>impacts of a changing climate</i> .	2.9.1	reduce greenhouse gas emissions and prepare for the <i>impacts of a changing</i> <i>climate</i> through approaches that: a) support the achievement of compact, <i>transit-supportive</i> , and <i>complete communities</i> ; b) incorporate climate change considerations in planning for and the development of <i>infrastructure</i> , including stormwater management systems, and <i>public service facilities</i> ; c)support energy conservation and efficiency; d) promote green <i>infrastructure</i> , low <i>impact development</i> , and <i>active</i> <i>transportation</i> , protect the environment and improve air quality; and e) take into consideration any additional approaches that help reduce green house gas emissions and build community resilience to the <i>impacts of a changing climate</i> .	 particularly relating to extreme heat and increasing storm occurrences into planning for and the development of housing, public spaces, and <i>infrastructure</i>, including stormwater management systems, and <i>public service facilities</i>; c) support energy conservation and efficiency and encourage opportunities to incorporate renewable community energy into <i>public service facilities</i>, parking facilities, and all new development or redevelopment; d) Incorporate equity considerations into climate change planning, addressing the disproportionate vulnerabilities for Indigenous Nations, persons with disabilities, and other equity-deserving groups; f) Connect climate change adaptation planning to broader public health and safety considerations, including food access and supply, air and water quality, and delivery of emergency management services. 	
3.1.1	Infrastructure and public service facilities shall be provided in an	3.1.1	Infrastructure and public service facilities shall be provided in an	References to climate change when planning for infrastructure and public	NO

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	efficient manner while accommodating projected needs. Planning for <i>infrastructure</i> and <i>public service facilities</i> shall be coordinated and integrated with land use planning and growth management so that they: a) are financially viable over their life cycle, which may be demonstrated through asset management planning; b) leverage the capacity of development proponents, where appropriate; and c) are available to meet current and projected needs.		efficient manner while accommodating projected needs. Planning for <i>infrastructure</i> and <i>public</i> <i>service facilities</i> shall be coordinated and integrated with land use planning and growth management so that they: a) are financially viable over their life cycle, which may be demonstrated through asset management planning; b) leverage the capacity of development proponents, where appropriate; and c) are available to meet current and projected needs.	service facilities should be included in this section, to encourage sustainable and climate-friendly growth.	
3.1.1. b)	leverage the capacity of development proponents, where appropriate; and	3.1.1. b)	leverage the capacity of development proponents, where appropriate; and	Further clarity on the intent of b) "leverage the capacity of development proponents" should be provided.	NO
3.1.2	Planning and investments in infrastructure and public service facilities should be prioritized to support strategic growth areas as focal areas for growth and development.	N/A	Deleted	This policy should be modified to re- include references to green infrastructure, to support sustainable and climate-friendly growth.	NO
3.1.6	Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high-rise developments, in <i>strategic growth</i>	3.1.5	Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high- rise developments, in strategic growth areas, and other areas with a compact built form.	This policy should be broadened beyond school boards and daycare facilities to be more inclusive of all public service facilities. Additionally, the role of other levels of government and government bodies, such as the Ministry of Education, should be recognized for the role they play in delivering these facilities such as through funding. To achieve this, the policy should	NO

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	areas, and other areas with a compact built form.			be expanded to better align with the <i>Growth</i> <i>Plan section</i> 3.2.8.5. Additionally, to better achieve goals relating to compact growth and the efficient use of land, school boards should be required to consider how to develop school sites in a more compact manner.	
3.2.1	Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.	3.2.1	Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero- and low- emission vehicles.	Policies from the Growth Plan section 3.2.2.2 should be reintegrated into the Provincial Planning Statement.	NO
3.2.4	N/A – New Addition	N/A	N/A	(addition to PPS) Maintain section 3.2.2.4 from the Growth Plan.	NO
3.3.6	N/A – New Addition	N/A	N/A	(addition to PPS) This section should be strengthened using the wording and policies from section 3.2.5 of the Growth Plan.	NO
3.5.1	Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.	3.5.1	Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.	In its current form, it is unclear if land use compatibility policies apply where sensitive uses are permitted in lands for employment outside of employment areas. It should be clarified policies 3.5 apply whether in an employment or outside of an employment area.	NO

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3.5.2	Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other <i>major</i> <i>facilities</i> that are vulnerable to encroachment by ensuring that proposed adjacent <i>sensitive land</i> <i>uses</i> are only permitted if potential impacts to industrial, manufacturing or other <i>major</i> <i>facilities</i> are minimized and mitigated in accordance with provincial guidelines, standards and procedures.	3.5.2	Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that proposed adjacent sensitive land uses are only permitted if potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.	In its current form, the policy focuses solely on impacts on the major facility from the sensitive land use. The policy does not address impacts on the sensitive land uses from the major facility. This is an important component with respect to land use compatibility, particularly as we continue to intensify residential land uses it must be done in a manner that mitigates and minimizes adverse effects on sensitive land uses.	NO
3.6.1 b)	 Planning for sewage and water services shall: b) ensure that these services are provided in a manner that: 1. can be sustained by the water resources upon which such services rely; 2. is feasible and financially viable over their life cycle; 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and 4. considers comprehensive municipal planning for these services, where applicable. 	3.6.1. b)	 Planning for sewage and water services shall: b) ensure that these services are provided in a manner that: 1. can be sustained by the water resources upon which such services rely; 2. is feasible and financially viable over their life cycle; 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and 4. aligns with comprehensive municipal planning for these services, where applicable. 	References to climate change should be added to this section to ensure resilient and sustainable infrastructure.	NO
3.6.4	Where municipal sewage services and municipal water services or private communal sewage services and private communal	3.6.4	Where municipal sewage services and municipal water services or private communal sewage services and private communal water	Despite planning no longer being conducted up upper-tier levels of government, this policy should still require coordination with upper-tier governments	NO

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	water services are not available, planned or feasible, <i>individual on-</i> <i>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> . At the time of the official plan review or update, planning authorities should assess the long-term impacts of <i>individual</i> <i>on-site sewage services</i> and <i>individual on-site water services</i> on environmental health and the financial viability or feasibility of other forms of servicing set out		services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. 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 environmental health and the financial viability or feasibility of other forms of servicing set out in policies 3.6.2 and 3.6.3.	who retain control of servicing. The removal of this direction is not recommended.	
3.6.8	in policies 3.6.2 and 3.6.3. Planning for stormwater management shall: a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b) minimize, or, where possible, prevent increases in contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure; d)mitigate risks to human health, safety, property and the environment;	3.6.8	 Planning for stormwater management shall: a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure; d) mitigate risks to human health, safety, property and the environment; 	References to climate change should be reintroduced to this section to ensure that stormwater management planning considers this critical aspect of forward- looking planning.	NO

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	 e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and <i>low impact</i> <i>development</i>; and g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a <i>watershed</i> scale. 		 e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale. 		
3.7	Waste management systems need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future requirements, and facilitate integrated waste management.		Waste management systems need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future requirements, and facilitate integrated waste management.	The portion of the policy on encouraging and promoting waste reduction, reuse and recycling in the <i>Provincial Policy Statement</i> <i>section 1.6.10.1</i> was removed but should be re-integrated into the <i>Provincial Planning</i> <i>Statement</i> .	NO
3.X	N/A – New Addition	N/A	N/A	(addition to PPS) Section 1.7.1 a)-i) of the Provincial Policy Statement should be re- introduced to the Provincial Planning Statement. This section provides strong statements relating to growth and the role that orderly planning has in promoting it. This section could be integrated into a more applicable Chapter 2: Building Homes, Sustaining Strong and Competitive Communities.	NO
3.9.1 a)	Healthy, active, and inclusive communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and	3.9.1 a)	Healthy, active, and inclusive communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster	This section could be enhanced by referencing "vulnerable users and people of all ages and abilities" for a greater degree of inclusivity. Additionally, including references to active transportation and recreation is important as these public spaces are	NO

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	abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;		social interaction and facilitate active transportation and community connectivity;	intended to be used for day-to-day trips as well as for recreational activities.	
3.9.1 b)	b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;	3.9.1. b)	b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;	"planning and providing a full range of publicly accessible built and natural settings for recreation including public facilities, parklands, public spaces, open space areas, trails and where practical water-based resources with consideration for the needs of persons of all ages and abilities where appropriate and feasible"	NO
3.9.1 c)	c) providing opportunities for public access to shorelines; and	3.9.1. c)	providing opportunities for public access to shorelines; and	This policy should be enhanced to reference not only shorelines, but also include reference to natural areas or destinations where there are opportunities for public use and recreation.	NO
3.9.1 d)	d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.	3.9.1 d)	d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.	"recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas in tandem with safe, comfortable and respectful recreational use"	NO
4.1	See PPS 2023 Page 19-20	4.1	See PPS 2024 Page 21	(General Comments) OPPI has concerns that the natural heritage policies in the Growth Plan have not been carried over into the proposed Provincial Planning Statement. While the natural heritage policies and definitions appear to be consistent with the Provincial Policy Statement, 2020, this has the effect of lowering the standards of protection for natural heritage features and systems in the Greater Golden Horseshoe which currently reside within the Growth Plan.	NO
4.2	See PPS 2023 Page 20-21	4.2	See PPS 2024 Page 22	(General Comments) Though policies for	NO

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				stormwater management are contained in <i>Chapter 3</i> of the <i>Provincial Planning</i> <i>Statement</i> , the important link between water quality and quantity and stormwater management must be understood. Stormwater, especially considering the effects of climate change, can have large impacts on streams, lakes, rivers, and wetlands, and cannot be considered in isolation. Proper controls for stormwater are essential for preventing the degradation of natural heritage features, such as water, which could severely impact the benefits of Ontario's water cycle/regime.	
4.2.3	Municipalities are encouraged to undertake watershed planning to inform planning for sewage and water services and stormwater management, including low impact development, and the protection, improvement or restoration of the quality and quantity of water.	4.2.3	Municipalities are encouraged to undertake, and large and fast- growing municipalities shall undertake watershed planning to inform planning for sewage and water services and stormwater management, including low impact development, and the protection, improvement or restoration of the quality and quantity of water.	4.2.3 encourages municipalities to undertake watershed planning to inform planning for swage and water services and stormwater management. We understand the importance of watershed planning for stormwater management but do not understand the linkage between watershed planning and sewage and water services. This needs to be clarified or refence to swage and water services removed.	NO
4.3.2.5	Subordinate to the principal dwelling, up to two additional residential units may be permitted in <i>prime agricultural areas</i> , provided that: a) any additional residential units are within, attached to, or in close proximity to the principal dwelling;	4.3.2.5	Where a residential dwelling is permitted on a lot in a <i>prime</i> <i>agricultural area</i> , up to two additional residential units shall be permitted in accordance with provincial guidance, provided that any additional residential units: a) comply with the <i>minimum distance</i> separation formulae;	Section 4.3.2.5 allows up to two additional residential units subordinate to the principal dwelling. This change can help keep multi- generational farm families on the farm, but severances of these additional residential units as contemplated in 4.3.2.5 should not be permitted for the reasons noted above.	Partial

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	 b) any additional residential unit complies with the minimum distance separation formulae; c) any additional residential unit is compatible with, and would not hinder, surrounding agricultural operations; and d) appropriate sewage and water services will be provided. The additional residential units may only be severed from the lot containing the principal dwelling in accordance with policy 4.3.3.1. 		 b) are compatible with, and would not hinder, surrounding agricultural operations; c) have appropriate sewage and water services; d) address any public health and safety concerns; e) are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and f) minimize land taken out of agricultural production. Additional residential units may only be severed in accordance with policy 4.3.3.1.c). 		
4.3.3.1 4.3.3.2	 4.3.3.1. Residential lot creation in prime agricultural areas is only permitted in accordance with provincial guidance for: a) new residential lots created from a lot or parcel of land that existed on January 1, 2023, provided that: 1. agriculture is the principal use of the existing lot or parcel of land; 2. the total number of lots created from a lot or parcel of land as it existed on January 1, 2023 does not exceed three; 3. any residential use is compatible with, and would not hinder, surrounding agricultural operations; and 	4.3.3.1 4.3.3.2 4.3.3.3	 4.3.3.1 Lot creation in <i>prime agricultural areas</i> is discouraged and may only be permitted in accordance with provincial guidance for: a) <i>agricultural uses</i>, provided that the lots are of a size appropriate for the type of <i>agricultural use(s)</i> common in the area and are sufficiently large to maintain flexibility for future changes in the type or size of agricultural operations; b) <i>agriculture-related uses</i>, provided that any new lot will be limited to a minimum size needed to accommodate the use and appropriate <i>sewage and water services</i>; c) up to one <i>residence surplus to an agricultural operation</i>, provided that: 	The Provincial Planning Statement fundamentally changes the established approach to agriculture and threatens the viability of key aspects of the agricultural industry within the Province. These changes would allow unprecedent growth to occur in rural and agricultural areas. This not only threatens the long-term viability of farms, but it increases traffic and wear and tear on rural roads and escalates service delivery and infrastructure burdens for rural municipalities. There are two main initiatives included within the Provincial Planning Statement that raise concern about the ongoing viability of farming in Ontario, and which should not be included in the final document:	Yes

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	4. any new lot: i. is located outside		1. the new lot will be limited to a	Section 4.3.3.1 would allow three	
	of a specialty crop area;		minimum size needed to	residential severances per farm parcel in	
	ii. complies with the minimum		accommodate the use and appropriate	prime agricultural areas.	
	distance separation formulae;		sewage and water services; and		
	iii. will be limited to the minimum		2. the planning authority ensures that	Section 4.3.3.2 forces municipalities to	
	size needed to accommodate the		new dwellings and additional	abide by section 4.3.3.1, allowing the three	
	use while still ensuring		residential units are prohibited on any	residential severances.	
	appropriate sewage and water		remnant parcel of farmland created by		
	services;		the severance. The approach used to		
	iv. has existing access on a public		ensure that no new dwellings or		
	road, with appropriate frontage		additional residential units are		
	for ingress and egress; and		permitted on the remnant parcel may		
	v. is adjacent to existing non-		be recommended by the Province, or		
	agricultural land uses or consists		based on municipal approaches that		
	primarily of lower-priority		achieve the same objective; and		
	agricultural lands.				
			d) infrastructure, where the facility or		
			corridor cannot be accommodated		
	b) a residence surplus to an		through the use of easements or		
	agricultural operation as a result		rights-of-way.		
	of farm consolidation, provided				
	that:		4.3.3.2		
			Lot adjustments in prime agricultural		
	1. the new lot will be limited to a		areas may be permitted for legal or		
	minimum size needed to		technical reasons.		
	accommodate the use while still				
	ensuring appropriate sewage and		4.3.3.3		
	water services; and		The creation of new residential lots in		
			prime agricultural areas shall not be		
	2. the planning authority ensures		permitted, except in accordance with		
	that new residential dwellings are		policy 4.3.3.1.c).		
	prohibited on any remnant parcel				
	of farmland created by the				
	severance. The approach used to				
	ensure that no new residential				
	dwellings are permitted on the				
	remnant parcel may be				
	recommended by the Province, or				

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	based on municipal approaches which achieve the same objective. 4.3.3.2. Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 4.3.3.1 (a) except to address public health or safety concerns.				
4.5	See 2023 PPS Pages 24-26	4.5	See 2024 PPS Pages 27-28	(General Comments) It is important for Ontario to maintain strong policies for the protection and abundant availability of mineral aggregate resources, as this supports the government's stated goal to build 1.5 million new homes by 2031 and supports the growth and renewal of required infrastructure. Additionally, residential lot creation in rural areas also could threaten the protection of mineral aggregate deposits due to incompatible development.	NO
4.6	See 2024 PPS Pages 26	4.6	See 2024 PPS Pages 29	(General Comments) There are inconsistencies between the recent changes to the Ontario Heritage Act and the wording of the proposed PPS. For example, while municipalities are now obligated to evaluate Section 27 "Listed" properties against O.Reg 9/06 and demonstrate that at least one provincial criterion is met, under the PPS, these properties have no formal protection under the proposed definition of Protected Heritage Property. The process of completing an evaluation can be time- consuming and costly for municipalities and development applicants. If Section 27 "Listed" properties have no protections,	NO

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				more municipalities may proceed directly to designation to ensure the protection of cultural heritage resources as their only option.	
4.6	N/A – General Comment	4.6	N/A – General Comment	(General Comments) The current wording concerning National Historic Sites and other federal sites within the definition of Protected Heritage Property states that it only applies to "property protected under federal heritage legislation." This does not protect privately owned National Historic Sites which fall outside the protection of federal legislation. The definition of Protected Heritage Property should be amended to ensure the protection of all National Historic Sites of Canada.	NO
4.6.3	Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.	4.6.3	Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.	The changes to the definition of adjacent as applied to cultural heritage resources will increase direct and indirect risks. The current definition, which allows for expanded definition within an official plan, is critical to ensure that development near (but not contiguous to) cultural heritage resources adequately takes their significance and heritage attributes into account. A good example are the buffer areas surrounding World Heritage Sites. These areas are often not directly contiguous but works within these areas can have significant impacts on the Outstanding Universal Value of these sites. Similarly, construction projects near cultural heritage resources can results in impacts such vibrations (such as from blasting) or dust that are not limited to contiguous properties.	NO

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4.6.5	Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.	4.6.5	Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.	Ontario is proposing changes to Cultural Heritage and Archaeology (Section 4.6) and Implementation and Interpretation (Section 6.1) policies to encourage "early" engagement with Indigenous Nations. We support this language change and the requirement that planning authorities "shall" undertake early engagement, which remains unchanged. The term "early" however, is not interpreted consistently.	Partial
5.2.1	Planning authorities shall identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.	5.2.1	Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.	Further clarity on this policy is required. If municipalities have not identified these hazards, are protections still granted? Typically, Conservation Authorities have the ability to assist with identifying hazards. However, often hazard mapping is out of date and the process of updating it is cost prohibitive.	YES
6.1	N/A	N/A	N/A	Insert a new policy under 6.1 that replicates Provincial Policy Statement section 4.6 to clarify that a municipality's official plan is the most important tool for implementing the policies outlined in the Provincial Planning Statement.	NO
6.1.4	When implementing this Policy Statement, the Minister of Municipal Affairs and Housing may make decisions that take into account other considerations to balance government priorities.	6.1.4	When implementing this Policy Statement, the Minister of Municipal Affairs and Housing may make decisions that take into account other considerations to balance government priorities.	It is unclear what this policy means with respect to other considerations. If the intent is that the Minister does not have to be consistent with the Provincial Planning Statement, that would be a step in the wrong direction.	NO
6.1.10	Municipalities are encouraged to monitor and report on the implementation of the policies in their official plans, in accordance with any requirements for reporting planning information to the Province, and data standards	6.1.10	Municipalities are encouraged to monitor and report on the implementation of the policies in their official plans, in accordance with any requirements for reporting planning information to the Province,	Further clarity is requested on additional reporting expectations. Often, municipalities lack the resources to implement comprehensive data reporting.	NO

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	and including through any other guidelines that may be issued by the Minister.		and data standards and including through any other guidelines that may be issued by the Minister.		
6.2.2; 6.2.3; 6.2.4	2. Planning authorities shall undertake early engagement with Indigenous communities and coordinate on land use planning matters to facilitate knowledge- sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.6.2.2; encouraged to engage the public and stakeholders early in local6.2	6.2.2; 6.2.3; 6.2.4	 2. Planning authorities shall undertake early engagement with Indigenous communities and coordinate on land use planning matters to facilitate knowledge- sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. 3. Planning authorities are encouraged to engage the public and stakeholders early in local efforts to implement this Policy Statement, and to provide the necessary information to ensure the informed involvement of local citizens, including equity-deserving groups. 	These subsections establish the early engagement policies with various key stakeholders. The direction is positive as it has been the practice of many municipalities. However, it is important to ensure the provincial requirements and Treaty obligations are maintained as they relate to Duty to Consult. It is recommended that a new Section 6.3 be created specifically for the engagement policies separate from the coordination policies in Section 6.2.	NO
	4. Planning authorities and school boards shall collaborate to facilitate early and integrated planning for schools and associated child care facilities to meet current and future needs.		4. Planning authorities and school boards shall collaborate to facilitate early and integrated planning for schools and associated child care facilities to meet current and future needs.		
6.2.7	Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall: a) identify and allocate population, housing and employment	6.2.9	Where planning is conducted by an upper-tier municipality, the upper- tier municipality in consultation with lower-tier municipalities shall: a) identify and allocate population, housing and employment projections for lower-tier municipalities;	The proposed policy states that upper tiers would identify where growth would be focused. However, there is a need to provide clarity to whether that includes determinations on the location of settlement boundary expansions. This lack of clarity could result in confusion and	NO

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	projections for lower-tier municipalities; b) identify areas where growth and development will be focused, including strategic growth areas, and establish any applicable minimum density targets; c) identify minimum density targets for growth and development taking place in new or expanded settlement areas, where applicable; and d) provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries.		 b) identify areas where growth and development will be focused, including strategic growth areas, and establish any applicable minimum density targets; c) identify minimum density targets for growth and development taking place in new or expanded settlement areas, where applicable; and d) provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries. 	differences of interpretations.	
7	Additional needs housing: 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 additional needs housing may include, but are not limited to long-term care homes, adaptable and accessible housing, and housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for older persons.	7	Additional needs housing: 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 additional needs housing may include, but are not limited to long-term care homes, adaptable and accessible housing, and housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for older persons.	Additional Needs Housing: Further consideration is required with regards to this definition and the implications for guiding equitable land use, development and growth in the province.	NO
7	Complete communities: means places such as mixed-use neighbourhoods or other areas	7	Complete communities: means places such as mixed-use neighbourhoods or other areas	Complete Communities: The emphasis on inclusivity and equitable access in how Complete Communities are defined is	YES

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	within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, <i>public</i> <i>service facilities</i> , local stores and <i>services. Complete communities</i> are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.		within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.	encouraging.	
7	Employment area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. Uses that are excluded from <i>employment areas</i> are institutional and commercial, including retail and office not associated with the primary employment use listed above.	7	Employment area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.	Employment Areas: The Provincial Planning Statement Employment Areas definition removed "institutional and commercial, including retail and office not associated with the primary employment use listed above". This creates issues with how municipalities plan for these areas over time and may have unintended consequences for attracting jobs.	NO
7	N/A	N/A	N/A	Equity-Deserving Groups: The draft Provincial Planning Statement uses the term "equity-deserving groups" in two	NO

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				policies: Policy 2.1.4. c) Planning	
				authorities should support the	
				development of complete communities by:	
				improving social equity and overall quality	
				of life for people of all ages, abilities, and	
				incomes, including equity-deserving	
				groups; and Policy 6.2.3 "Planning	
				authorities are encouraged to engage the	
				public and stakeholders early in local	
				efforts to implement this Policy Statement,	
				and to provide the necessary information	
				to ensure the informed involvement of local citizens, including equity-deserving	
				group." While this is an improvement from	
				the 2020 Provincial Policy Statement and	
				Growth Plan, which did not use this	
				language, the Provincial Planning	
				Statement does not provide a clear	
				definition as to what constitutes equity-	
				deserving groups.	
				The Government of Canada defines equity-	
				deserving groups or equity-denied groups	
				as: "A group of people who, because of	
				systemic discrimination, face barriers that	
				prevent them from having the same access	
				to the resources and opportunities that are	
				available to other members of society, and	
				that are necessary for them to attain just	
				outcomes." The Provincial Planning	
				Statement should adopt this definition to	
				provide clarity in interpreting the intent of	
				the policy and its impacts on equity-	
				deserving groups and communities.	
	N/A		N/A	Affordable Housing: The Provincial	NO
7		N/A		Planning Statement should re-integrate	
				references to affordable housing and the	

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				need for municipalities to establish	
				minimum targets for the provision of	
				affordable housing explicitly for low-	
				income households and those experiencing	
				homelessness. The removal of this	
				language is counter to policy direction of	
				the Federal National Housing Strategy Act	
				(2019) which recognizes that housing is an	
				essential human right that is inherent to	
				the dignity and wellbeing of all Ontarians,	
				as well as Provincial direction to create	
				socially equitable complete communities.	