

**Peoples Official Plan comments on the PPS ERO-019-6813 – August 4, 2023**

Row no.	Portion of the proposed PPS ERO – 019-6813	Analysis and recommendations to the Province
<b>Chapter 1: Introduction</b>		
1	<p>How to Read this Policy Statement</p> <p>The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning. This Policy Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.</p>	<p>POP supports the City of Ottawa’s recommendation to add “health” to the list of factors to be considered in land use planning.</p>
<b>Vision</b>		
2	<p>Second paragraph:</p> <p>The long-term prosperity and social well-being of Ontario depends on celebrating these differences and planning for <i>complete communities</i> for people of all ages, abilities and incomes. More than anything, a prosperous Ontario will see the building of more homes for all Ontarians. In addition, a prosperous Ontario will support a strong and competitive economy, and a clean and healthy environment. Ontario will increase the supply and mix of <i>housing options</i> and address the full range of housing affordability needs. Every community will build homes that respond to changing market needs, and local needs and demand. Providing a sufficient supply with the necessary range and mix of <i>housing options</i> will support a diverse and growing population and workforce, now, and for many years to come. A successful Ontario will also be one with a competitive advantage of being investment-ready and celebrated for its influence, innovation and cultural diversity. The Ontario economy will continue to mature into a centre of industry and commerce of global significance. Central to this success will be the people who live and work in this Province. Ontario’s land use planning framework, and the decisions that are made, shape how our communities grow and prosper. While progress has been made, equity-deserving groups still face a complex range of challenges. Municipalities will work with the Province to design complete communities with increased access to housing, employment, schools, transportation options, recreation and public spaces, and services that are equitable and sustainable for all Ontarians.</p>	<p>POP supports the City of Ottawa’s recommendation to add “healthy” as an attribute of complete communities and “healthy and resilient” in the phrase “Municipalities will work with the Province to design healthy and resilient communities...”</p>

3	<p>Eighth paragraph: The wise use and management of resources will be encouraged including natural areas, agricultural lands and the Great Lakes while providing attention to appropriate housing supply and public health and safety. Potential risks to public health or safety or of property damage from natural hazards and human-made hazards, including the risks associated with the impacts of climate change will be mitigated. This will require the Province, planning authorities, and conservation authorities to work together.</p>	POP supports the City of Ottawa’s recommendation regarding minimizing risks through avoidance rather than mitigation, retaining strong protection for natural features and including the notion of liveability and health as part of the vision.
4	<p><b>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities</b></p>	<p>POP supports the City of Ottawa’s recommendation to retain “health” in the title of this chapter and in policy directions of Chapter 2.1.</p> <p>“The City recommends that the Province re-integrate health in the title of Chapter 2 and policy directions of Chapter 2.1 to ensure health-promoting planning policies at the municipal level are supported by Provincial policies.”</p>
<p><b>2.1 Planning for People and Homes</b> 5</p>	<p>4. Planning authorities should support the achievement of complete communities by:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and</li> <li>c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.</li> </ul>	<p>These additional features of complete communities referenced in PPS 2020 should be retained:</p> <ul style="list-style-type: none"> <li>(d) minimizing negative impacts to air quality and climate change, and promoting energy and carbon efficiency</li> <li>(e) preparing for the impacts of a changing climate</li> </ul>
<p><b>2.2 Housing</b> 6</p>	<p>1. Planning authorities shall provide for an appropriate range and mix of <i>housing options</i> and densities to meet projected needs of current and future residents of the <i>regional market area</i> by:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) permitting and facilitating:</li> </ul>	<p>Affordable housing, both market affordability and deep affordability, must explicitly be included in the notion of a “ full range of housing options.” The requirement for municipalities to establish minimum targets for affordable to low- and moderate-income must also be retained.</p>

1. all *housing options* required to meet the social, health, economic and well-being requirements of current and future residents, including *additional needs housing* and needs arising from demographic changes and employment opportunities; and
  2. all types of residential *intensification*, including the conversion of existing commercial and institutional buildings for residential use, development and introduction of new *housing options* within previously developed areas, and *redevelopment* which results in a net increase in residential units in accordance with policy 2.3.3;
- c) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation*; and d) requiring *transit-supportive* development and prioritizing *intensification*, including potential air rights development, in proximity to transit, including corridors and stations.

### 2.3 Settlement Areas and Settlement Area Boundary Expansions

7	1. <i>Settlement areas</i> shall be the focus of growth and development. Within <i>settlement areas</i> , growth should be focused in, where applicable, <i>strategic growth areas</i> , including <i>major transit station areas</i> .	POP supports the concept of strategic growth areas, which include gentle intensification in neighbourhoods in addition to intensification in nodes and corridors.
8	2. Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities; c) support <i>active transportation</i> ; d) are <i>transit-supportive</i> , as appropriate; and e) are <i>freight-supportive</i> .	Land use patterns play a role in climate change mitigation, environmental and energy resilience. Sub-policies addressing these factors should be reflected in this policy as follows:  f) mitigate climate change; g) promote environmental and energy resilience; h) promoting development and land use patterns that conserve biodiversity (i) preparing for the regional and local impacts of a changing climate
9	3. Planning authorities should support 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 investment in the necessary infrastructure and public service facilities.	Even absent specific minimum intensification targets, intensification and redevelopment should be prioritized over further urban sprawl in the achievement of complete communities. This should be reflected in this policy as follows: “Planning authorities should <b>prioritize</b> intensification and redevelopment to support the achievement of complete communities,”.

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 area provides for the phased progression of urban development.

The current process ties such decisions to the comprehensive review of an official plan (as per section 26 of the *Planning Act*). This places urban expansion decisions in the proper context, namely a 25-year planning horizon and the need for additional urban land. In order to select lands suitable for urban expansion, municipalities such as Ottawa have developed a comprehensive evaluation system based on the facts of any particular candidate expansion land.

Still, this method has not served our community well. Its very complexity results in compromised transparency and ability to game the system. These weaknesses could be overcome by more rigorous peer review of the results.

We recognize, however, that a one-off process as proposed could have its advantages -- greater flexibility and ability to scrutinize each application individually -- but only if its provisions are strengthened through PPS text amendments and regulations as follows:

1. Instead of just having to "consider" certain factors, the planning authority must be provided with a "demonstration" that certain conditions have been met.
2. The condition of "sufficient capacity in existing or planned infrastructure and public service facilities" must be embedded in approved municipal official and long-range financial plans.
3. Agricultural lands must be strictly off-limits for urban expansion. Even in the current PPS, the protection of agricultural lands is too weak. "Prime Agricultural Areas" should be added to 2.3.4 b).
4. The "phased progression of urban development" must be as formulated in an approved official plan. The last point is so critical that some of the existing language of the PPS should be retained, namely current section 1.1.3.8 a), which requires demonstration that market demand cannot be met through intensification or redevelopment, i.e., there has to be demonstration of a need. This need could also be demonstrated in relation to policies 2.1.2a), which should be maintained as per the PPS 2020 language as follows: "(a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development", and also in relation to 2.1.2b) regarding a three year supply of serviced land.

The unmodified text of the PPS itself (proposed section 6.2, moved from current section 1.2) requires that a "coordinated, integrated and comprehensive approach should be used when dealing with planning matters" which includes "population, housing and employment

## 2.6 Rural Lands in Municipalities

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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.

projections". Likewise, in the "How to Read" the PPS, it states that the Province's planning system "recognizes and addresses the complex interrelationships among environmental, economic and social factors in land use planning."

A one-off process to decide on urban expansion would need the adoption of specific PPS policies to ensure these principles are respected.

Even if it is decided to divorce urban expansion decisions from comprehensive reviews of the official plan, the definition of "comprehensive review" should be retained and referenced in new text that sets out guidance for 5- or 10-year reviews of official plans as per section 26 of the *Planning Act*.

POP fully supports the City of Ottawa's position regarding the prohibition of multi-lot residential *developments* on *rural lands*.

QUOTE "The City of Ottawa does not support policy changes that would make rural lot creation for residential *development* easier to obtain outside of established *settlement areas*. Not only would it result in inefficient and costly land use patterns, but it would create challenges for providing essential services, adversely impact natural systems, increase conflict with agricultural businesses, and impact the feasibility of future mineral extraction operations.

The Official Plan considered urban expansion candidate areas, some of which posed challenges due to the presence of existing country lot subdivisions. Permitting future rural subdivisions will hamper potential future urban expansion areas and decrease the amount of housing those lands could have provided.

Rural multi-lot creation is inconsistent with the proposed direction in Chapter 2.1, Chapter 2.3 and Chapter 2.8. This will create a conflict between existing and future residents and will make planning for *infrastructure* very difficult, fragmented, and costly. This would create conflict between agricultural and residential traffic (i.e., tractors slowing impacting residential traffic). The introduction of additional residential *development* may hamper the expansion of agricultural operations and negatively impact a municipality's ability to expand the urban boundary in an orderly and logical way.

The City does not support the policy change regarding multi-lot residential *developments on rural lands*, which will introduce significant complexity to the City’s long-term planning of *infrastructure*. The City strongly recommends the Province withdraw this proposed change to policy, which will decrease the number of future homes on these lands, and create many negative impacts for municipalities.”ENDQUOTE

**2.9 Energy Conservation, Air Quality and Climate Change**

12 1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the *impacts of a changing climate* through approaches that:  
a) support the achievement of compact, *transit-supportive*, and *complete communities*; b) incorporate climate change considerations in planning for and the development of *infrastructure*, including stormwater management systems, and *public service facilities*; c) support energy conservation and efficiency; d) promote *green infrastructure*, *low impact development*, and *active transportation*, 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 *impacts of a changing climate*.

The new language of this policy addresses key issues but would benefit from these additional elements:  
add a specific reference to the transition away from fossil fuel use in sub-policy c);  
add a specific reference to maximizing tree cover and greenspace within settlement areas as a means of building community resilience.

**3.1 General Policies for infrastructure and Public Service Facilities**

13 1. Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs. Planning for infrastructure and public service facilities 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.

Preparing for climate change encompasses the sustainability of these infrastructures as well. Add to this policy, and also to policies 3.6.2 and 3.6.8, the following: d) prepare for the impacts of a changing climate

**3.7 Waste Management**

14 1. 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 original text “promote reduction, reuse and recycling objectives” has been removed and replaced with “integrated waste management”. The original text should be retained and expanded as follows.

Landfill gas recovery should be mandated for all municipal and private landfills and organics recovery should be a requirement for all municipalities, with the possible exception of small rural communities.

**4.1 Natural Heritage**  
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4.1 Natural Heritage

1. Natural features and areas shall be protected for the long term.
2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.
3. Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.
4. Development and site alteration shall not be permitted in: a) significant wetlands in Ecoregions 5E, 6E and 7E1; and b) significant coastal wetlands.
5. Development and site alteration shall not be permitted in:
  - a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;
  - b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)<sup>1</sup>;
  - c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)<sup>1</sup>;

While the original text was not at all specific, it did address in some fashion the broad waste management objectives that the Province has long supported. It did not however make any explicit reference to organics waste diversion, which is where major action to reduce GHGs / methane needs to be directed. In addition, it did not address the distinction between residential waste and that generated by the industrial, commercial and institutional sectors where there are no regulations driving or supporting waste diversion from disposal.

The new phraseology “integrated waste management” means little or nothing without any explanation of what an integrated waste management system looks like. Waste management collection, processing and disposal systems operated by municipalities are already integrated to a degree through such means as dual pick-ups (e.g., compost and garbage collected at the same time in dual compartment trucks). Integration does not exist with ICI wastes, which are largely managed through landfill disposal, because individual waste generators are responsible for managing the wastes they generate.

Neither the original nor the revised phrasing addresses the fundamental waste management challenges

The proposed text seems to be identical to PPS 2020.

However, changes to the Wetlands Evaluation System introduced by Bill 23 have opened the door to the loss of significant wetlands by permitting individual parts of a complexed wetland to be evaluated on their own. These changes must be reversed as they will surely lead to the loss of significant wetlands all around Ottawa.

In addition, unevaluated wetlands in Ottawa’s rural area continue to be lost to development and site alteration, as are woodlands if they are not considered significant. These are grievous losses in the context of climate change as these natural features produce valuable ecosystem services regarding the mitigation of and adaptation to climate change for all Ottawa residents.

Addressing these issues and providing even minimal protections for these features in this policy would be a great improvement.

- d) significant wildlife habitat;
  - e) significant areas of natural and scientific interest; and
  - f) coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4(b) unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.
6. Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.
  7. Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.
  8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.
  9. Nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue.

**4.2 Water**

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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) identifying water resource systems; d) maintaining linkages and functions of water resource systems; e) implementing necessary restrictions on development and site alteration to: 1. protect drinking water supplies and designated vulnerable areas; and 2. protect, improve or restore vulnerable surface and ground water and their hydrologic functions; f) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and g) ensuring consideration of environmental lake capacity, where applicable.

Sub-policy h) should be added retaining the same language as PPS 2020: evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level.

**4.3 Agriculture**

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4.3.1

1. Planning authorities are encouraged to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous

The entire section in numerous places replaces “based on guidelines developed by the province” with “based on provincial guidance” —a term with no specific meaning. The former should be retained.

This enshrines the term ‘geographically continuous’ into the determination of an agricultural land base worthy of protection—an artificial distinction that leaves unprotected thousands of acres of prime agricultural land. Protection should be extended to all productive agricultural



	agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.	land. 4.3.1.1 should be changed to read "...to maintain and enhance an agricultural land base and..."
18	3. Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through 7 lands within the prime agricultural area, in this order of priority.	Deleting the sentence "Prime agricultural areas are areas where prime agricultural lands predominate" removes the nuance that prime agricultural areas can include land that is not prime agricultural land. This makes the 'geographically continuous' threshold more difficult to meet, and will result in the loss of protection for more prime agricultural lands. This definition should be retained as in PPS 2020.
19	4.3.2 Permitted Uses 4. A principal dwelling associated with an agricultural operation may be permitted in <i>prime agricultural areas</i> as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1 b).	
20	5. Subordinate to the principal dwelling, up to two additional residential units may be permitted in prime agricultural areas, provided that: a) any additional residential units are within, attached to, or in close proximity to the principal dwelling; 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.	Allowing additional residential units on farmland may be of value to provide housing for multiple, shared owners or agricultural workers, particularly in labour-intensive horticultural food production. However, allowing the possibility for these additional units to be severed will invite abuse of this privilege. The sentence following d) should be changed to read e) The additional residential units are clearly identified as supporting agricultural operations on the existing lot, and therefore can never be severed from the lot containing the principal dwelling.
21	4.3.3 Lot Creation and Lot Adjustments 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;	Residential lot creation in prime agricultural areas should be restricted, as it will further disrupt the agricultural landscape, challenge the geographically continuous fabric, and potentially introduce more points of conflict for neighbouring farms. 4.3.3.1 should be changed to read "Residential lot creation in prime agricultural areas is not permitted."

- 3. any residential use is compatible with, and would not hinder, surrounding agricultural operations; and
- 4. any new lot:
  - i. is located outside of a specialty crop area;
  - ii. complies with the minimum distance separation formulae;
  - iii. will be limited to the minimum size needed to accommodate the use while still ensuring appropriate sewage and water services;
  - iv. has existing access on a public road, with appropriate frontage for ingress and egress; and
  - v. is adjacent to existing non-agricultural land uses or consists primarily of lower-priority agricultural lands.

22 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.

Municipalities should be able to decide to make their zoning by-laws more restrictive than 4.3.3.1 on a case by case basis so as to restrict lot creation in prime agricultural areas.

23 4.3.4 Removal of Land from Prime Agricultural Areas  
1.Planning authorities may only exclude land from prime agricultural areas for expansions of or identification of settlement areas in accordance with policy 2.3.4.

This essentially removes all protection for prime agricultural lands in peri-urban areas. Prime agricultural lands should be off-limit for urban expansion. Change 4.3.4.1 to read “Planning authorities must exclude land from prime agricultural areas for expansions of or identification of settlement areas.”

24 4.3.5 Non-Agricultural Uses in Prime Agricultural Areas  
1.Planning authorities may only permit non-agricultural uses in prime agricultural areas for: a) extraction of minerals, petroleum resources and mineral aggregate resources;  
or b) limited non-residential uses, provided that all of the following are demonstrated:  
1. the land does not comprise a specialty crop area;  
2. the proposed use complies with the minimum distance separation formulae;  
3. There is an identified need within the planning horizon provided for in policy 2.1.1 for additional land to accommodate the proposed use; and  
4. alternative locations have been evaluated, and  
i. there are no reasonable alternative locations which avoid prime agricultural areas;  
and  
ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.

This further de-prioritizes the protection of prime agricultural areas in favour of aggregate extraction and urban expansion. Priority ought to be given to the protection of prime agricultural areas. With this priority given, renewable energy generation should be listed as a permitted use in 4.3.5.1 a).

#### 4.6 Cultural Heritage and Archaeology

25	1. <i>Protected heritage property</i> , which may contain <i>built heritage resources</i> or <i>cultural heritage landscapes</i> , shall be <i>conserved</i> .	The definition of <i>protected heritage property</i> should be modified to include: “Designated National Historic Sites” and “Federally-owned properties designated by the Federal Heritage Buildings Review Office”.
<b>Chapter 7: Definitions</b>		
26	Complete communities: means places such as mixed-use neighbourhoods or other areas within cities, towns, and <i>settlement areas</i> that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, <i>public service facilities</i> , local stores and services. <i>Complete communities</i> are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.	The characteristics of <i>complete communities</i> also need to include “healthy and resilient” or “healthy, active, and inclusive”.
27	Housing options: means a range of housing types such as, but not limited to single-detached, semi-detached, row houses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses, multi-residential buildings, including low- and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, additional needs housing, multi-generational housing, student housing, farm worker housing, culturally appropriate housing, supportive, community and transitional housing and housing related to employment, educational, or institutional uses, such as long-term care homes.	In the definition of housing options (i) affordable housing should be included and defined; (ii) housing for people with special needs should be included and defined (iii) attainable housing should be included and defined; (iv) deeply affordable housing should be included and defined.
28	Deletion of definition of Low and moderate income households	The definition of low and moderate income households of the current 2020 PPS should be retained.
29	Definition of watershed planning	POP supports the City of Ottawa’s position on the definition of watershed planning.  “For clarity, the City of Ottawa recommends that the Province consider revising the definition to recognize that <i>watershed planning</i> may occur at different spatial scales and may include <i>sub-watersheds</i> and <i>catchment areas</i> . Consider recognizing the concept of <i>sub-watershed</i> planning for municipalities situated within portions of large <i>watersheds</i> . Ottawa has several large river systems that extend far outside our boundaries and our planning is

frequently informed by *sub-watershed* plans instead of (or as well as) full-scale watershed plans.”

30 Deletion of definition of recreation

The definition of Recreation of the current 2020 PPS should be retained.

31 Definition of Heritage attributes

The phrase “may include the property’s built, constructed, or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (e.g. significant views or vistas to or from a protected heritage property)” should be reinstated in the definition of heritage attributes.

32 Deletion of definition of residential intensification

A definition of residential intensification should be retained.