

At its meeting held on May 21, 2015, the Council of The Regional Municipality of York referred Report No. 1 of the Commissioner of Corporate Services and Chief Planner, as amended by the memorandum from the Chief Planner dated May 21, 2015 (to insert 8 maps to Attachment 3), to the Special Meeting of Regional Council scheduled on May 28, 2015.

At its Special Meeting held on May 28, 2015, the Council of The Regional Municipality of York adopted the recommendations, as amended, in the memorandum from the Chief Planner dated May 28, 2015 and the recommendations, as amended, in Report No. 1 of the Commissioner of Corporate Services and Chief Planner dated May 21, 2015.

1. Council received the following deputations:

- Bob James, Resident of the Town of Whitchurch-Stouffville
- Leo McArthur, President, Miller Group
- Susan Lloyd Swail, Greenbelt Program Manager, Environmental Defence
- Nancy Hopkinson, Nobleton Alert Residents Association Inc.
- Debbie Schaefer, Ward 5 Councillor, Township of King
- Deb Schulte, Resident of the City of Vaughan
- Susan Rosenthal, Davies Howe Partners LLP on behalf of Frank Rita, John DiCostanzo and 1483404 Ontario Limited
- Don Given, Malone Given Parsons Ltd., on behalf of various clients
- Mary Bromley, Resident of the Township of King
- Greg Locke, Chair, Concerned Citizens of King Township
- Susan Walmer, Executive Director, Oak Ridges Moraine Land Trust
- Bobby Bhoola, Resident of the City of Vaughan
- Marianne Yake, Richmond Hill Naturalists
- Anthony Francescucci, Weston Downs Ratepayers Association
- Ryan Guetter, Vice President, Weston Consulting on behalf of various landowners

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- Garry Hunter, Hunter and Associates
- Stephen Roberts, Sustainable Vaughan
- Carin Bachen, Resident of the Town of Whitchurch-Stouffville

2. Council received the following communications:

- Guido Masutti, Resident of the City of Vaughan, dated April 6, 2015
- Mark McConville, Humphries Planning Group Inc. on behalf of Vaughan 400 North Landowners Group Inc., dated May 11, 2015
- Paul Tobia, Evans Planning Inc. on behalf of Asha Rani Batra, dated May 13, 2015
- Matthew James Cory, Malone Given Parsons Ltd. on behalf of Glenwoods Gateway Investments Inc., dated May 15, 2015
- Garry Hunter, Hunter and Associates, dated May 15, 2015
- Cam Milani, Milani Group, dated May 15, 2015
- Susan Rosenthal, Davies Howe Partners LLP on behalf of Frank Rita, John DiCostanzo and 1483404 Ontario Limited, dated May 19, 2015
- Matthew Cory, Malone Given Parsons Ltd. on behalf of The Ballantrae/Aurora Road Property Owners Group, dated May 22, 2015
- Bobby Bhoola, Resident of the City of Vaughan, dated May 25, 2015
- Brad Rogers, Groundswell Urban Planners Inc. on behalf of Oxford Homes, dated May 26, 2015
- Don Given, Malone Given Parsons Ltd. on behalf of the Sharon Heights Landowner Group, dated May 26, 2015
- Peter Smith, 1448774 Ontario Limited - Planning Consultants on behalf of various clients, dated May 27, 2015
- Ryan Guetter, Weston Consulting, dated May 27, 2015

3. Council received the presentation slides from Valerie Shuttleworth, Chief Planner, dated May 21, 2015.

4. Council adopted the following three recommendations, as amended, in the memorandum from Valerie Shuttleworth, Chief Planner, dated May 28, 2015, recommending that Report No. 1 of the Commissioner of Corporate Services and Chief Planer, dated May 21, 2015 be amended as follows:

1. Staff recommendation 14 contained in Report No. 1 of the Commissioner of Corporate Services and the Chief Planner, dated May 21, 2015, be revised to remove the word “recreational” so the recommendation now reads as follows:
 14. The Province consider amending the Greenbelt Plan to permit compatible community uses.
2. Council endorse additional staff recommendation 35 as follows:
 35. The Province provide enforcement assistance and/or additional resources to local municipalities to address the legal or illegal placement of fill, dumping and outdoor storage on rural and agricultural lands within the Plan areas.
3. This memorandum be forwarded to the Ministry of Municipal Affairs and Housing as part of the Region’s submission in response to EBR posting No. 012-3256.

5. Council adopted the following consolidated recommendations, as amended, in Report No. 1 of the Commissioner of Corporate Services and Chief Planner, dated May 21, 2015:

1. Regional Council endorse the following 37 staff recommendations as the Region’s formal response to the Environmental Bill of Rights (EBR) posting entitled Coordinated review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan (EBR No. 012-3256):
 1. The Province stay the course by maintaining the integrity and objectives of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan.
 2. The Province provide no less than a six month period for review of any proposed amendments to the Plans.

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3. The Province recognize the importance of significant woodlands and urban forest canopy cover as integral to delivering complete communities, and take a no-net-loss approach to managing forest cover in the Greenbelt Plan and ORMCP areas.
4. The Province amend the Plans to reflect recent Provincial Policy Statement modifications (2014) to agricultural definitions and permitted uses.
5. The Province review and resolve the conflict between the Holland Marsh Specialty Crop Area in the Greenbelt Plan and the Provincially Significant Wetland.
6. The Province amend the Plans to include policies that require appropriate buffers and/or mitigation measures in new urban areas adjacent to Greenbelt Plan agricultural lands.
7. The plans be amended to provide guidance and policies which support municipal efforts to mitigate and adapt to climate change.
8. The Province provide standardized data and a methodology to analyze and quantify climate change impacts.
9. The Province develop a process to allow municipalities to access strategically located employment lands, if deemed necessary through a Municipal Comprehensive Review.
10. Policy 2.2.6.5 of the Growth Plan be amended to include the words "... through an upper- or single-tier *municipal comprehensive review*..."
11. The Province provide greater direction on what constitutes 'strategic' employment lands.
12. The Province not expand the Greenbelt onto the developable portion of 'whitebelt' lands as part of the 2015 review.
13. The Province revise the Plans, in how they refer to the 'whitebelt' lands.
14. The Province consider amending the Greenbelt Plan to permit compatible community uses.
15. The Province align the mandates of provincial ministries beyond the Ministry of Municipal Affairs and Housing to achieve Growth Plan objectives.
16. The Province consider removing the requirement that cemeteries be "small scale" on rural lands within the ORMCP to provide access to a greater supply of land to accommodate future needs.

17. The Province explore opportunities to provide guidance within the Provincial Plans related to infrastructure to ensure that planning for new communities and intensification is carried out in a coordinated and consistent manner across the GTHA (e.g. acknowledge Master Planning exercises).
18. Provincial investments in infrastructure be made strategically to support forecasted growth and to ensure that the GGH is positioned competitively in the global marketplace when competing for employment attraction.
19. The Province continue financial support to municipalities in constructing and operating multi-modal transportation networks essential to achieving the required densities and objectives of the Growth Plan.
20. The Province revisit policies regarding servicing communities in the Greenbelt and ORMCP, in consultation with municipalities and stakeholders.
21. The Growth Plan be amended to shift policies 3.2.6.5 and 3.2.6.6 from Section 3.2.6 Community Infrastructure to a new subsection within the Where and How to Grow section.
22. The Province allow municipalities to use inclusionary zoning to require affordable housing units in new developments.
23. The Province consider minor amendments to the method of measuring density for the planning of complete communities, particularly as it relates to incorporating industrial and warehousing type employment uses.
24. The Province develop a methodology for consistently undertaking a land budget and for forecasting population and employment growth.
25. Although York Region takes no new positions on individual landowner requests, the Region asks the Province to develop a process to review boundaries associated with the Greenbelt Plan and ORMCP.
26. The Province amend subsection 2(4) of the ORMCP to permit residual lands outside of the ORM, resulting from confirmation of the 245 contour, to be reconciled with the adjacent land use designation.
27. The Province consider growing the Greenbelt northwards into south Simcoe County in order to prevent continuing 'leap-frog' development in communities which may not have the appropriate infrastructure to manage such growth in a sustainable manner which is consistent with delivering complete communities as is the intent of the Plans.
28. The Province amend Section 42 of the ORMCP and Section 3.2.3 of the Greenbelt Plan as necessary to identify and resolve mapping and policy conflicts and terminology inconsistencies.

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29. The Province consider amending the *Oak Ridges Moraine Conservation Act* and *Greenbelt Act* to include ‘sunset’ clauses, excluding strategic employment lands on the “400 series” corridors.
 30. The Province reconcile policies, terminology and mapping within legislation and plans to ensure they align.
 31. The Province deliver outstanding technical guidelines in a timely manner.
 32. The Province develop guidelines to address the fiscal implications for not accommodating forecast growth through the development of complete communities.
 33. The Province revoke outdated technical guidelines.
 34. The Province consult with stakeholders on monitoring in accordance with the indicators and available data to establish the baseline conditions for future monitoring.
 35. The Province provide enforcement assistance and/or additional resources to local municipalities to address the legal or illegal placement of fill, dumping and outdoor storage on rural and agricultural lands within the Plan areas.
 36. The Province examine the possible expansion of the Greenbelt after local municipalities complete subwatershed studies or other environmental studies that might identify additional lands appropriate for the Greenbelt Plan.
 37. The Province develop a process to consider compatible additions to land use permissions within the Greenbelt Plan and ORMCP.
2. The Regional Clerk forward this report and attachments to the Minister of Municipal Affairs and Housing.
 3. The Regional Clerk circulate this report to the Clerks of the local municipalities and to the York Region Agricultural Advisory Liaison Group.

Report No. 1 of the Commissioner of Corporate Services and Chief Planner, dated May 21, 2015 now follows:

2015 Coordinated Provincial Review
of the Growth Plan for the Greater Golden Horseshoe,
the Greenbelt Plan and Oak Ridges Moraine Conservation Plan

1. Recommendations

It is recommended that:

1. Regional Council endorse the staff recommendations contained in the body of this report as the Region's formal response to the Environmental Bill of Rights (EBR) posting entitled Coordinated review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan (EBR No. 012-3256).
2. The Regional Clerk forward this report and attachments to the Minister of Municipal Affairs and Housing.
3. The Regional Clerk circulate this report to the Clerks of the local municipalities and to the York Region Agricultural Advisory Liaison Group.

2. Purpose

To seek council endorsement of the staff recommendations contained in this report as the Region's formal response to the Coordinated review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan (ORMCP) and Niagara Escarpment Plan (Environmental Bill of Rights (EBR) No. 012-3256). Further, that this report and attachments be forwarded to the Minister of Municipal Affairs and Housing as input to the 2015 Coordinated Review.

3. Background

The Region has a strong history leading to the development of the Oak Ridges Moraine Conservation Plan, Greenbelt Plan and Growth Plan

In the late 1980s and early 1990s, the Province recognized the importance of the Oak Ridges Moraine through release of the GTA Greenlands Study (Kanter Report, 1989), declaration of Provincial Interest in the Moraine in 1990, and release of interim implementation guidelines for protecting the Moraine in 1991.

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Later in the 1990s, the Regional municipalities of York, Peel and Durham, with the support of grass-roots conservation organizations, initiated the Tri-Region Strategy to address long-term protection of the Oak Ridges Moraine. Reports emerging from that partnership included recommendations that were fundamental in advancing a Provincial agenda which ultimately resulted in the release of the *Oak Ridges Moraine Conservation Act* and Plan in 2001, the *Greenbelt Act* and Plan in 2005 and the *Places to Grow Act* and Growth Plan for the Greater Golden Horseshoe (Growth Plan) in 2005/2006.

Since the release of these Plans, Regional Council has supported their implementation and incorporated policies into both the 1994 and 2010 York Regional Official Plans. York Region's continued support and active participation in the current review is critical to the success of the Plans, and to meeting Regional objectives.

In anticipation of the 2015 Provincial review, the Region conducted proactive consultation and provided preliminary input to the Province on the Greenbelt Plan and ORMCP

In anticipation of the Provincial review of the Greenbelt Plan and ORMCP the Region undertook proactive consultation. Staff hosted workshops with local municipal staff and stakeholders, in addition to hosting a Council Education Session on the Plans in October 2013. In early 2014, Regional staff from across the organization was invited to participate in a workshop and provide comments.

In April 2014, Regional Council endorsed a report entitled "Preliminary Input – Upcoming Reviews of the Greenbelt Plan and Oak Ridges Moraine Conservation Plan", summarizing these proactive consultation efforts. Through that report, the Region formally requested that the Province coordinate the review of the Greenbelt Plan and ORMCP with the review of the Growth Plan and to ensure that all future 10-year reviews are undertaken in the same manner. The Region also recommended that the Province undertake a comprehensive consultation process, comparable to that undertaken in the early 2000s, prior to the initial release of the Plans.

As directed by Council in April 2014, Regional staff hosted three Public Open Houses in June 2014 at three different locations across the Region to gather public input on the Greenbelt Plan and ORMCP and inform the Regional position on the Plans. Feedback from the Public Open Houses has been included in Attachment 1.

The Province initiated a 90-day comment period for Phase 1 of the 2015 coordinated review of four Provincial Plans in February

On February 27, 2015, the Province announced the coordinated review of the Greenbelt Plan, ORMCP, Niagara Escarpment Plan and the Growth Plan, with a

90-day commenting period. The Niagara Escarpment Plan has not been reviewed as part of the Regional response to the Provincial process, as the Niagara Escarpment is located entirely outside of York Region.

Provincial materials confirm that the 2015 Coordinated Provincial review will be completed in two phases of public consultation as follows:

Phase 1 of the Provincial Review Process (February 27 – May 28 2015):

- The Province has provided a 90-day window for input to be received during this phase of consultation. Public comments will be accepted until May 28, 2015.
- To help guide public consultation during Phase 1, the Province released a discussion document entitled “Our Region, Our Community, Our Home”. Staff has prepared a response to the discussion document in consultation with local municipal staff and stakeholders (Attachment 2)
- Submissions received during Phase 1 of the process will assist the Province in informing the development of proposed amendments to the Plans

Phase 2 of the Provincial Review Process (timing uncertain):

- The second phase of consultation will focus on obtaining feedback on any proposed amendments to the Plans, to be developed following the conclusion of Phase 1
- Timing and additional details of the second phase of consultation have yet to be announced by the Province

Preventing leap-frog development, access to strategic employment lands and comprehensive consultation remain Regional priorities after 10 years of implementation

In 2004, the Region provided comments and recommendations to the Province on Bill 135 (*The Greenbelt Act*) and the Greenbelt Draft Plan. The Region submitted a number of recommendations on December 16, 2004 that were not addressed in the final version of the Greenbelt Plan, currently under review. Specifically, comments related to:

- ‘Leap-frog’ development occurring beyond the northern boundary of the Plan area;
- Providing access to strategic employment lands; and

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- Timing and duration of the review period.

After a decade of implementation experience with the Greenbelt Plan, the Region will put forth a number of the same recommendations to the Province, as submitted in 2004.

Staff has participated in a wide range of consultation activities with respect to the Provincial Plan reviews

The Region has been committed to conducting a balanced and inclusive review process that captures the input and experiences of our diverse community members and stakeholders who are affected by these policy documents. In addition to the consultation Regional staff undertook prior to the Provincial process, activities undertaken during the 90-day Phase 1 consultation period were as follows:

**Table 1
Staff Participation in Consultation Activities during the 90-day review period for Phase 1 of the 2015 Coordinated Review**

Date	Activity
March 2, 2015	Discussion Document circulated to Regional Staff for comments
March 3, 2015	Invitation to comment sent out to regional staff, stakeholders, circulation list, local municipal staff, etc.
March 16, 2015	York Region Agricultural Advisory Liaison Group meeting
March 23, 2015	Provincial Stakeholder Workshop
March 27, 2015	Ontario Farmland Trust 2015 Farmland Forum – Pursuing Diverse and Collaborative Approaches to Farmland Protection
March 31, 2015	Friends of the Greenbelt Foundation – Feedback Session on Agricultural Systems Report by Dr. Wayne Caldwell
April 10, 2015	York Region Planning Directors and Commissioners Meeting
April 12, 2015	Provincial Town Hall Meeting – Aurora
April 20, 2015	York Region Agricultural Advisory Liaison Group meeting
April 25, 2015	York Region local municipal planners meeting
May 8, 2015	York Region Local Municipal CAOs Meeting
May 14, 2015	Provincial Town Hall Meeting – Vaughan

The Region has taken steps above and beyond participating in the Province’s process to ensure residents and stakeholders have had ample notice and opportunity to participate in the review of the Plans. In addition to attending and hosting formal engagement opportunities, staff has met with developers,

landowners and other stakeholder groups to discuss and receive additional input on the Plans. As much as possible, the Region has conducted a comprehensive consultation process to ensure that a balance of perspectives on the Plans is put forward in the Regional submission to the Province.

4. Analysis and Options

The Analysis and Options section of this report has been broken down into the following sub-topics incorporating specific staff recommendations within each section:

- Consultation Process
- Supporting Environmental and Agricultural Principles
- Accommodating Long-Term Growth
- Plan Area and Designation Boundaries
- Plan Implementation and Monitoring

Consultation Process

Given the extent of these Plans on the geography and future of the Region, and given the short Phase 1 review timeframe, extensive consultation and review time is essential for the next phase of the review.

The Region recommends the Province provide at least six months for Phase 2 consultation

As the Provincial Plans have significant implications for Regional and Local land use planning, the Region requires sufficient time to undertake a comprehensive review and analysis of any proposed amendments. Given the relatively short Phase 1 time frame, the Region is asking the Province to allow at least six months to respond to draft amendments, when published in Phase 2.

Regional staff recommends that:

1. The Province provide no less than a six month period for review of any proposed amendments to the Plans.

Supporting Environmental and Agricultural Principles

Staying the course and strengthened support for environmental and agricultural principles can be achieved by recognizing the importance of forest cover, agricultural viability and addressing climate change.

In general, the Province is encouraged to stay the course to achieve objectives of the Plans

The Province of Ontario is to be commended for its commitment to growth management, environmental and agricultural protection and the creation of complete communities in the Greater Golden Horseshoe (GGH). Over the past decade, tremendous effort and resources, on behalf of local and regional municipalities in the GTHA, have been exerted to amend and defend official plans to conform to these significant land-use planning documents.

Regional staff recommends that:

2. The Province stay the course by maintaining the integrity and objectives of these Plans.

The Province is encouraged to recognize the importance of significant woodlands and urban forest canopy cover

The York Region Greening Strategy was developed in 2001 and refined in 2012 and includes the objective of increasing forest cover to 25% of York Region's total land area by 2031. The Region is currently in the process of delivering an integrated monitoring strategy and advancing an implementation plan in support of the Greening Strategy as it relates to forest cover and urban forest canopy. To support the Region's efforts, it would be beneficial for the Province to identify mechanisms to support the achievement of a net gain of forest cover in Provincial Plan areas.

Regional staff recommends that:

3. The Province recognize the importance of significant woodlands and urban forest canopy cover as integral to delivering complete communities, and take a no-net-loss approach to managing forest cover in the Greenbelt Plan and ORMCP areas.

There are opportunities to enhance the Plans' ability to promote agricultural viability and a strong rural economy

Agriculture depends upon connections with the natural heritage system, transportation networks, businesses that serve the agriculture sector (including processing, preserving and distributing agricultural products), as well as other

land uses and economic activities. It is important for the Plans to acknowledge and sustain these connections in order to support the viability of agricultural activities and not simply preserve land viable for agriculture. Supporting a successful agricultural industry and maintaining working farms within the Greenbelt is key to its long-term protection and stewardship.

Revised policies contained in the Provincial Policy Statement 2014 permit a greater range of uses in Prime Agricultural Lands, supporting flexibility and resilience in the agriculture industry and the rural economy. Specifically, the Provincial Policy Statement (2014) added or clarified defined terms, and expanded permitted uses which recognize how the practice of farming is evolving. The agricultural community supports these modifications which will enhance overall viability of the agricultural industry.

Regional staff recommends that:

4. The Province amend the Plans to reflect recent Provincial Policy Statement modifications (2014) to agricultural definitions and permitted uses.

York Region is fortunate enough to have one of only two Greenbelt 'Specialty Crop Areas', the Holland Marsh, within its boundaries. However, that Specialty Crop Area designation extends beyond what is currently actively farmed, and those lands not currently in production are also identified as Provincially Significant Wetland by the Ministry of Natural Resources. While the Province has recognized the full extent of the Holland Marsh Specialty Crop Area in the Greenbelt Plan, concern has been expressed that the Provincially Significant Wetland designation precludes any agricultural expansion, thereby impacting the ongoing viability and economic stability of this important resource.

Regional staff recommends that:

5. The Province review and resolve the conflict between the Holland Marsh Specialty Crop Area in the Greenbelt Plan and the Provincially Significant Wetland.

Addressing the urban-agricultural interface is essential to protecting the viability of agricultural operations

The interface between future residential communities and abutting existing, permanent agricultural uses creates challenges. As the Region continues to grow and urbanize, compatibility issues need to be addressed at a Provincial scale to protect both residents and farmers. On March 26, 2015, Regional Council endorsed a recommendation to address issues of urban-agricultural compatibility through comments to the Province during the review of the Greenbelt Plan and ORMCP. Staff has consulted with the York Region Agricultural Advisory Liaison Group and with other members of the agricultural community in York Region and

throughout the GGH and have received support for requesting the Province to develop policies addressing this issue.

The Province is encouraged to include amendments requiring a transition area between urban and permanent agriculture through the current review of the Greenbelt Plan and ORMCP in order to protect and promote agricultural viability, particularly as this issue is not unique to York Region.

Regional staff recommends that:

6. The Province amend the Plans to include policies that require appropriate buffers and/or mitigation measures in new urban areas adjacent to Greenbelt Plan agricultural lands.

Support for building communities resilient to climate change should be strengthened

York Region commends the Province for its commitment to addressing climate change through reduced greenhouse gas emissions and increasing the resiliency of communities. The Region recently submitted staff comments to the Ministry of the Environment and Climate Change regarding the Climate Change Discussion Paper, released in early 2015 (EBR No. 012-3452). Staff comments outlined the need to address both adaptation and mitigation. The Province is encouraged to review the Region's submission when developing actions to address climate change.

While the Plans currently work to ensure the resiliency of communities within the GGH by protecting natural heritage and agricultural systems and promoting the delivery of complete communities, improvements to the Plans should be considered. Providing guidance for how municipalities can manage increased demands and impacts on infrastructure such as stormwater management, wastewater and drinking water treatment and conveyance, in light of increasingly severe weather events, would enable municipalities to optimize the design and use of infrastructure.

The Province might also consider providing information or metrics for how municipalities could analyze and quantify climate change impacts consistently and also help facilitate collaboration between municipalities on common initiatives (i.e. stormwater management at municipal boundaries). Further, providing climate data and assessment tools to municipalities to help in identifying risks and areas of opportunities related to climate change would enable municipalities to be proactive in planning for the impacts.

Regional staff recommends that:

7. The plans be amended to provide guidance and policies which support municipal efforts to mitigate and adapt to climate change.
8. The Province provide standardized data and a methodology to analyze and quantify climate change impacts.

Accommodating Long-Term Growth

Access to strategic employment lands, the reservation of 'whitebelt' lands, investment in transit and the ability to deliver community uses and affordable housing are essential to achieving the objectives of the Growth Plan.

Access to strategically located employment lands is required to deliver long-term employment growth

Protection of strategic employment lands is a priority for the Region. Work completed to date through York Region's Municipal Comprehensive Review indicates that York Region has sufficient land outside of Provincial Plan areas to accommodate projected growth in employment and population to 2041. There will likely come a time when York Region's employment needs can no longer be accommodated within the existing and planned employment areas. Attracting and strategically locating employment is especially important for economic sustainability and the delivery of complete communities in smaller municipalities within the Region.

The Province should consider the development of a process through which lands within Greenbelt Plan and ORMCP areas, identified as strategic locations to accommodate future employment growth, could be made available for that purpose. The permissions should be accompanied by policies which prohibit conversion of the lands to uses other than employment in the future. Developing a process, criteria or special designation to enable municipalities to access these lands for employment purposes would make the most efficient use of existing and planned provincial transportation infrastructure. These locations are essential for employment uses that are reliant on goods movement.

Regional staff recommends that:

9. The Province develop a process to allow municipalities to access strategically located employment lands, if deemed necessary through a Municipal Comprehensive Review.

Existing policies within the Growth Plan regarding employment land conversions do not provide municipalities with adequate authority or tools to protect strategic lands from conversion to residential and other uses. Enabling upper- and single-

tier municipalities to prevent conversions of strategically located employment lands will ensure that the GGH remains globally competitive in attracting jobs and supporting economic growth.

Regional staff recommends that:

10. Policy 2.2.6.5 of the Growth Plan be amended to include the words "... through an upper- or single-tier *municipal comprehensive review*..."
11. The Province provide greater direction on what constitutes 'strategic' employment lands.

'Whitebelt' lands should be reserved to accommodate long-term growth

The 'whitebelt' lands within York Region may be required for the delivery of future growth (post 2031) and to optimize the use of existing and planned infrastructure. It is essential to reserve the Region's finite supply of developable land, and limit growing the Greenbelt within York Region to non-developable areas including urban river valleys.

Further, 'whitebelt' lands represent the only locations where urban expansions can be accommodated, if deemed necessary to deliver Growth Plan population and employment forecasts. Protecting this supply of land to accommodate future growth will further reinforce and strengthen the Greenbelt's objective of protecting agricultural lands and natural heritage features.

Regional staff recommends that:

12. The Province not expand the Greenbelt onto the developable portion of 'whitebelt' lands as part of the 2015 review.
13. The Province revise the Plans, in how they refer to the 'whitebelt' lands.

Accommodating a full range of facilities and services required to support complete communities is a challenge

Recreational facilities, sports fields, places of worship, cemeteries and other community service facilities are often very low-density uses. Locating these uses within the urban area reduces the overall density of the community in which they are located. This leads to challenges in meeting density requirements of the Growth Plan, while still endeavouring to provide for the full range of community facilities and services that support the delivery of complete communities.

The Vision for the Greenbelt Plan clearly articulates that the Greenbelt is a broad band of permanently protected land which provides for a diverse range of

economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses. While the Greenbelt Plan to date, has been successful in protecting agricultural land and natural heritage systems, there has been less emphasis placed on the importance of the Plan area for providing recreational opportunities to the residents of the GGH. While York Region supports and encourages alternative built forms to deliver these services within urban centres, additional consideration of some compatible community uses within the Greenbelt is warranted.

Alignment between the mandates of provincial ministries beyond the Ministry of Municipal Affairs and Housing with the Growth Plan is imperative to achieving required density targets. Partner ministries such as the Ministries of Transportation, Health and Long Term Care, and Education, for example, are encouraged to design infrastructure (i.e. interchanges) and mandate community facilities (i.e. schools, hospitals) that are sized to fit the increasingly urban context, rather than continuing to deliver traditional, land-consumptive suburban models. Delivering a built form which is more compact will enable municipalities to be better positioned to achieve Growth Plan intensification targets.

Finally, locating new cemetery facilities within the GTHA is a challenge. Restrictions within the Provincial Plans make it difficult to locate these community facilities.

Regional staff recommends that:

14. The Province consider amending the Greenbelt Plan to permit compatible community recreational uses.
15. The Province align the mandates of provincial ministries beyond the Ministry of Municipal Affairs and Housing to achieve Growth Plan objectives.
16. The Province consider removing the requirement that cemeteries be “small scale” on rural lands within the ORMCP to provide access to a greater supply of land to accommodate future needs.

The alignment of infrastructure planning with land use planning should be emphasized and supported by the Plans

Coordinated planning for growth management, including infrastructure, transportation, services and natural and cultural heritage management considerations is encouraged in the Provincial Policy Statement (2014). Similar coordination should be encouraged or required by the Growth Plan. York Region continues to use a coordinated systems-based approach to develop and update planning documents, such as the current five-year Regional Official Plan review and update being coordinated with master planning efforts for water and

wastewater and transportation services. Coordinating the update of these significant servicing and land use planning documents enables York Region to plan to accommodate growth in a comprehensive manner and eliminates the need for the Region to carry out future conformity exercises to ensure that the Regional Official Plan reflects the latest information and policy direction obtained from the completion of these studies.

Regional staff recommends that:

17. The Province explore opportunities to provide guidance within the Provincial Plans related to infrastructure to ensure that planning for new communities and intensification is carried out in a coordinated and consistent manner across the GTHA (e.g. acknowledge Master Planning exercises).
18. Provincial investments in infrastructure be made strategically to support forecasted growth and to ensure that the GGH is positioned competitively in the global marketplace when competing for employment attraction.

A dedicated source of funding to ensure continued support to build critical public transit infrastructure is essential to achieving objectives of the Growth Plan

Through the establishment of Metrolinx and adoption of The Big Move, the Provincial government has made unprecedented investments in planning for and delivering rapid transit infrastructure across the GTHA. Achieving the Growth Plan objective of building transit-oriented complete communities is dependent on the Province, in partnership with municipalities, being able to deliver critical transit infrastructure such as the Yonge North Subway Extension to Richmond Hill and Regional Express Rail, which would bring all-day, two-way GO Transit rail service to the Region. To date, much of the capital funding for projects outlined in The Big Move, with the exception of the Spadina Subway Extension into York Region, has been provided by senior levels of government, having limited tax levy impacts on the local municipalities.

Regional staff recommends that:

19. The Province continue financial support to municipalities in constructing and operating multi-modal transportation networks essential to achieving the required densities and objectives of the Growth Plan.

Progressive legislative reforms to the *Development Charges Act* and the *Municipal Act* are required to ensure that the significant investment in transit can be sustained over time. Similarly, revisions to the *Municipal Act* and

Development Charges Act are required to assist neighbouring communities at both the Local and Regional levels to fund transportation improvements that have mutual benefits for bordering jurisdictions. The goal should be to provide for seamless service levels across municipal boundaries. These comments have been included in the Region's response to Bill 73.

Policies regarding servicing options for existing communities within the Greenbelt and Oak Ridges Moraine Plan Areas should be reviewed

Extending lake-based municipal servicing into Greenbelt communities (example Community of Nobleton in King Township) is prohibited by the Greenbelt Plan. The same prohibition, however, does not seem to apply to communities within the Oak Ridges Moraine (example Village of Gormley in Whitchurch-Stouffville). Clarification is required in relation to these different standards, with apparently less restrictions on the Moraine. Further, within York Region there are communities on private sewage systems or standalone wastewater systems that are in close proximity of existing lake-based water and wastewater systems and a lake-based connection may potentially be a more preferable option (financially and environmentally) to service those communities. Regional staff is of the opinion that the Plans should allow for exploration of these alternatives.

Regional staff recommends that:

20. The Province revisit policies regarding servicing communities in the Greenbelt and ORMCP, in consultation with municipalities and stakeholders.

Affordable housing is an important part of creating complete communities

The Growth Plan includes two policies that speak directly to affordable housing, located in the Infrastructure to Support Growth section (Community Infrastructure subsection). Since the Growth Plan was approved in 2006, the Province has developed:

- Ontario's Long-Term Affordable Housing Strategy (currently under review);
- *Strong Communities through Affordable Housing Act* and *Housing Services Act* (in effect); and
- The Housing Policy Statement (in effect).

To implement minimum affordable housing targets, as directed in the Growth Plan, municipalities would benefit from additional Provincial tools, such as inclusionary zoning, that allow municipalities to require that affordable units be included in new developments.

Regional staff recommends that:

21. The Growth Plan be amended to shift policies 3.2.6.5 and 3.2.6.6 from Section 3.2.6 Community Infrastructure to a new subsection within the Where and How to Grow section.
22. The Province allow municipalities to use inclusionary zoning to require affordable housing units in new developments.

The Growth Plan requires municipalities to develop Housing Strategies and the *Housing Services Act* requires municipalities to develop Housing and Homelessness Plans. Many have interpreted these documents to be one in the same. If this is the Provincial intent, language between the two documents should be made consistent.

The Province should consider minor amendments to the method of measuring the Greenfield Density Target of 50 people and jobs per hectare

The Growth Plan's Designated Greenfield Density target of 50 people and jobs per hectare is intended to contribute towards the development of complete communities that include a mix of uses and an urban form that supports opportunities for walking, cycling and transit. The combined 50 people and jobs density target is the minimum density requirement that can support basic bus transit service at 30 minute intervals.

While the density that can potentially be achieved in residential areas can be forecast with reasonable accuracy, densities in employment land areas are much more variable. Within a typical employment area, employment densities could range from a very high density office building to a warehouse with very few employees. While warehousing and other low density employment uses do not contribute as much to meeting the Growth Plan's density targets as office uses, they are essential components of the York Region, GTHA and GGH economies. In areas with large amounts of lower density employment land uses, a much higher residential community density is needed to offset this lower density in order to meet the Growth Plan requirement. Planning has a reasonable array of tools to influence residential density levels, but limited capacity to influence the needs of businesses.

Regional staff recommends that:

23. The Province consider minor amendments to the method of measuring density for the planning of complete communities, particularly as it relates to incorporating industrial and warehousing type employment uses.

Clear direction on land budget and forecast methodology is required across the GTHA

The province is encouraged to develop a land budget and growth forecast methodology to ensure consistency between all municipalities in the GGH. The various assumptions a land budget is built around are complex and should be consistent across the GGH. A Provincial process used by all municipalities should help minimize appeals of regional and local growth management exercises to the Ontario Municipal Board, and make defending against such appeals more straightforward and effective.

In 2013, the Growth Plan was amended to include policy 5.3.5 stating that the Minister of Infrastructure will work with other Ministries on the development of a new methodology for measuring and forecasting employment. To date, this methodology has not been made available to municipalities.

Regional staff recommends that:

24. The Province develop a methodology for consistently undertaking a land budget and for forecasting population and employment growth.

Plan Area and Designation Boundaries

Regional staff is not making specific recommendations regarding individual landowner requests. Rather, the nature of a number of submissions support areas of concern and prompt additional recommendations regarding plan area boundaries and access to strategic employment lands.

The Region received submissions from landowners concerning 51 properties throughout the Region

Table 2 illustrates the number of properties included in site-specific requests, by local municipality. The majority of the submissions received relate to properties concentrated in King, Vaughan and Whitchurch-Stouffville.

Table 2
Distribution of Lands Subject to Site-Specific Requests across Local Municipalities

Local Municipality	Number of Site-Specific Submissions Received
Aurora	2
East Gwillimbury	3
Georgina	2
King	8
Markham	5
Newmarket	0
Richmond Hill	3
Vaughan	15
Whitchurch-Stouffville	13
York Region	51

Attachment 3 includes local municipal maps identifying all site-specific submissions received by York Region and contains details of the requests. Staff is recommending that site-specific requests fall into two categories as follows:

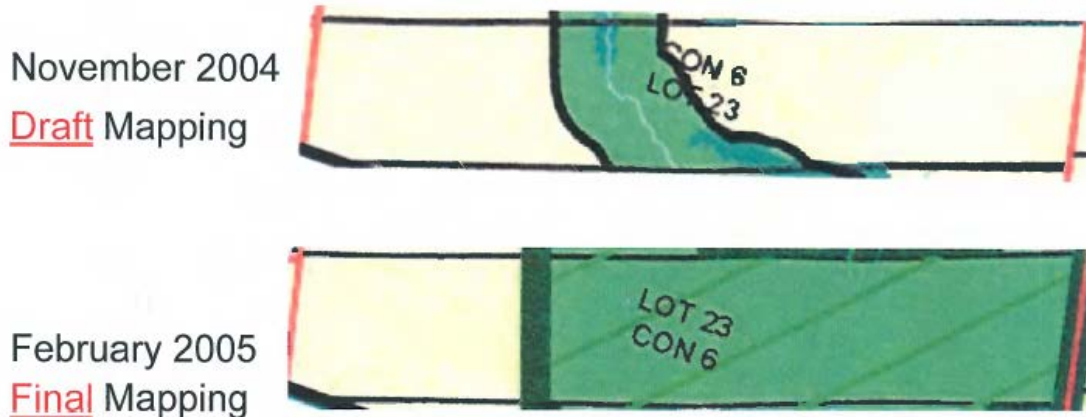
- Process for Employment Lands
- Process for Boundary Adjustments

The submissions that do not fall into either of the above categories will be provided to the Province as input received. A package containing all submissions in their entirety will be provided to the Ministry of Municipal Affairs and Housing.

A Provincially-led process to review Greenbelt Plan and ORMCP area and designation boundaries is required

A number of site specific submissions express concern over plan area boundaries, both outer boundaries and designation area boundaries. Although the nature of submissions is varied, a number question the rationale behind the mapping provided by the Province for the Greenbelt Plan and ORMCP. In some instances draft mapping varied significantly from final mapping; Figure 1 illustrates an example.

Figure 1
Sample Comparison of Lands Included in the Draft vs. Final Greenbelt Plan Mapping



Regional staff recommends that:

25. The province develop a process to confirm or correct boundaries associated with the Greenbelt Plan and ORMCP.

The level of support for the Plans among the general public has been strong with particular emphasis on maintaining and enhancing the integrity of the Oak Ridges Moraine in York Region. In this regard, the Region supports the continued protection of the Oak Ridges Moraine, particularly those lands identified as Natural Core and Natural Linkage areas. Significant background studies and scientific analyses were completed to support development of the ORMCP.

Confirmation of ORM boundary by surveying the 245 contour elevation should not result in 'orphaned' pockets of Protected Countryside

With respect to portions of the ORM southern boundary (i.e. east of Bathurst Street), the plan permits more precise delineation of the boundary through survey of the 245 metres above sea level contour. Subsection 2(4) of the ORMCP requires that residual lands, verified to be south of the confirmed contour (i.e. not within the ORM), be deemed within the Protected Countryside and subject to applicable policies. Regional staff questions the value of maintaining these lands within the Plan area. Rather, staff is of the opinion that these lands would be more appropriately consolidated with the adjacent land use designation.

Regional staff recommends that:

26. The province amend subsection 2(4) of the ORMCP to permit residual lands outside of the ORM, resulting from confirmation of the 245 contour, to be reconciled with the adjacent land use designation.

Growing the Greenbelt northwards into south Simcoe County would assist in preventing 'leap-frog' development from continuing to fragment agricultural and environmental systems

Communities situated in the Simcoe Sub-area of the Growth Plan, outside of the Primary Settlement Area of Barrie, are not subject to the same requirements as municipalities within the GTHA, including York Region. The Region has concerns about the direction of the Growth Plan as it relates to south Simcoe County and resulting impacts on York Region. In some cases, growth in south Simcoe County has resulted in residents of those communities commuting into and through GTHA municipalities for work and/or to access services and amenities. This has implications for infrastructure capacity in the Region.

In 2004, prior to the initial adoption of the Greenbelt Plan, Regional Council recommended that the Greenbelt Plan and Growth Plan contain provisions to prevent 'leap-frogging' of development north of the Greenbelt Plan (Report 11, Dec. 16, 2004).

Regional staff recommends that:

27. The Province consider growing the Greenbelt northwards into south Simcoe County in order to prevent continuing 'leap-frog' development in communities which may not have the appropriate infrastructure to manage such growth in a sustainable manner which is consistent with delivering complete communities as is the intent of the Plans.

Plan Implementation and Monitoring

Meeting the objectives of the Provincial Plans will be better achieved through the development of guidelines, ensuring consistent wording across provincial documents and by introducing a 'sunset' clause related to transitioned applications.

Provincial Plans should be updated to ensure consistency with source water protection approach specified by the Clean Water Act

Since the ORMCP and the Greenbelt Plan came into force in 2001 and 2005, respectively, additional Provincial legislation related to the protection of drinking

water quality has been enacted. Specifically, the *Clean Water Act* (2006) and related assessment reports, have resulted in both updated and new mapping for Wellhead Protection Areas, Intake Protection Zones, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas. This updated science has formed the basis for the development of Source Protection Plans. The Province should aim for consistency between the various pieces of legislation related to water quality in order to assist in interpreting and implementing overlapping Plans.

Regional staff recommends that:

28. The Province amend Section 42 of the ORMCP and Section 3.2.3 of the Greenbelt Plan as necessary to identify and resolve mapping and policy conflicts and terminology inconsistencies.

The Province is encouraged to 'sunset' transition policies for unapproved applications in the Greenbelt Plan and ORMCP

The ORMCP contains a number of transition policies which allow some applications commenced prior to November 17, 2001, which meet certain criteria, to continue to be 'grandfathered'. Similarly, the Greenbelt Plan contains a number of provisions which permit development applications made prior to December 16, 2004, to be transitioned and not required to conform to the policies of the Plan. Supported through public consultation, there is the opinion that proponents of development applications commenced prior to the ORMCP and Greenbelt Plans coming into effect have had sufficient time (up to 14 years) to act on such approvals. While, Regional staff has not reviewed the extent of transitioned applications in York Region, it is recommended that the Province consider amending the *Oak Ridges Moraine Conservation Act* and *Greenbelt Act* to include 'sunset' clauses.

Regional staff recommend that:

29. The Province consider amending the *Oak Ridges Moraine Conservation Act* and *Greenbelt Act* to include 'sunset' clauses.

The Province should be reconciling legislation and plans for easy, consistent implementation

Other legislation within the Province has been amended since adoption of these Plans; an example includes the Provincial Policy Statement (updated April 2014). Through consultation, the Region has heard strong support for the direction of the Provincial Policy Statement (2014). The Plans could benefit from amendments consistent with a number of the modified policies and definitions from the Provincial Policy Statement (2014). The Plans should also be updated to provide definitions that are consistent with other legislation, across all Ministries, which has been passed or amended since 2005, including but not

limited to: the *Clean Water Act*, the *Lake Simcoe Protection Act* and Plan, the *Endangered Species Act* and the *Green Energy Act*. Providing consistent definitions or interpretation guidelines for key undefined terms used throughout the Plans, such as “local” and “small-scale” would also promote consistent and defensible implementation of the Plans.

The Growth Plan establishes aggressive targets with respect to accommodating population and employment forecasts. Substantial infrastructure and services are required to support this growth. It is important to ensure that planning policy, fiscal policy, taxation policy, land use development and transit implementation are coordinated and aligned to support the objectives of the Growth Plan.

Regional staff recommends that:

30. The Province reconcile policies, terminology and mapping within legislation and plans to ensure they align.

The Province is encouraged to publish or revise existing technical guidelines to ensure consistent implementation of policies

The original Plans include references to a number of supporting guidelines to have been developed following their release in the early 2000s. The Growth Plan stated that a number of guidelines including transit-supportive land use guidelines, freight-supportive land-use guidelines, and a methodology for forecasting employment growth would be developed. To date, only the transit-supportive land use guidelines have been published in a final version. It is important for the Province to supply municipalities with guidelines in a timely manner, to ensure they inform any requisite updates to official plans, policies, or monitoring programs.

In addition to the guidelines that the Province originally indicated would follow the Growth Plan coming into effect, there are opportunities for the Government of Ontario to provide further technical guidance to continue to ensure appropriate and consistent implementation of the Plans. As previously discussed in this report, guidelines should be provided by the Province which establish the appropriate methodology for developing a land budget to accommodate Growth Plan forecast population and employment growth.

The Provincial Policy Statement (2014) now requires municipalities to plan for infrastructure in a manner which is coordinated and integrated with land use planning so that it is financially viable over its lifecycle (PPS 2014 policy 1.1.3.8 b) and policy 1.6.3 a). Highlighting best practices in fiscally responsible delivery of infrastructure from other jurisdictions would assist municipalities in determining the most fiscally-responsible approach to planning to accommodate and service forecast population and employment growth.

Regional staff recommends that:

31. The Province deliver outstanding technical guidelines in a timely manner.
32. The Province develop guidelines to address the fiscal implications for not accommodating forecast growth through the development of complete communities.
33. The Province revoke outdated technical guidelines.

A strong foundation for monitoring progress towards achieving Plan objectives is required

Within the Plans, the Province committed to monitoring their success. While performance indicators were recently published and released for the Growth Plan and the Greenbelt Plan, monitoring and reporting undertaken to date has been limited. Developing measureable indicators is a key step to ensuring that the Plans achieve their objectives. Without measureable, objective indicators, challenges will exist in deciding on a course of action to make appropriate amendments to the Plans that will continue to support the overall goals and vision of the Province. Understanding how the Plans are progressing towards achieving their objectives, will inform future reviews and municipal implementation of the Plans.

Regional staff recommends that:

34. The Province consult with stakeholders on monitoring in accordance with the indicators and available data to establish the baseline conditions for future monitoring.

Link to key Council-approved Plans

The responsibility for long-term planning in Ontario is shared between the Province and municipalities. The province sets the ground rules and directions for land use planning through the *Planning Act* and Provincial Policy Statement (2014). Additional plans, such as the Greenbelt Plan, ORMCP and Growth Plan, are created and brought into effect as needed to provide additional detailed and geographically specific policies. These Plans have laid much of the groundwork for the York Regional Official Plan 2010 (YROP-2010), and will continue to be influential in how the Region accommodates forecast growth in the future. The YROP-2010 is currently undergoing a five-year review and update.

The current provincial plan review is an example of how the Region will work to ensure optimal locations for business and employment growth are available, preserve green spaces, encourage growth along Regional Centres and Corridors and optimize critical infrastructure systems capacity as outlined in the Strategic

Plan 2015-2019. The Region's commitment to continuous improvement and implementation of the Greenbelt Plan, ORMCP and Growth Plan will help ensure that in the future, York Region will include "A Resilient Natural Environment and Agricultural System"; a goal of the Region's *Vision 2051*. Some of *Vision 2051*'s action areas that will be satisfied also include "A Protected, Connected and Enhanced Regional Greenlands System", "A Healthy Environment for a Healthy Population", and "Protect[ed] Vital Water Systems".

5. Financial Implications

Staff time associated with public, stakeholder and local municipal consultation and the development of a Regional response to the coordinated review of the Provincial Plans has been undertaken within the existing Planning and Economic Development staff complement and budget.

6. Local Municipal Impact

York Region's local municipalities have been consulted consistently leading up to and during the 2015 coordinated Provincial Plan review. A workshop with local municipal planning staff was hosted by the Region in November 2013 to gather input to inform the Region's preliminary review of the Greenbelt Plan and ORMCP. Once the 2015 coordinated review was announced by the Province, regional staff solicited further input from the local municipalities through an e-mail invitation to submit comments and through hosting an additional workshop in April 2015, to enable local and regional staff to coordinate comments on areas of Regional interest. The submission made by York Region endeavours to represent the views of Regional staff and local municipal staff from Aurora, East Gwillimbury, Georgina, King, Markham, Newmarket, Richmond Hill, Vaughan and Whitchurch-Stouffville regarding Regional areas of interest.

A number of York Region local municipalities have reported to their Councils with local positions on the coordinated review. While local recommendations may be more detailed than the Regional position, they are generally complementary. Attachment 4 includes a summary of local municipal reports on the 2015 coordinated review and a link to access the full documents.

7. Conclusion

The Province of Ontario is to be commended for its commitment to growth management and environmental and agricultural protection in the Greater Golden Horseshoe through the Greenbelt Plan, ORMCP and Growth Plan. There

2015 Coordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan

are however, a number of improvements that can be made through amendments to the Plans during the 2015 coordinated review.

In addition to comments provided through this report and the attachments, Regional staff will be sharing policy wording and editorial recommendations with staff of the Ministry of Municipal Affairs and Housing under separate cover.

For more information on this report, please contact Marisa Talarico, Planner, Long Range Planning at ext. 71528 or Sandra Malcic, Manager, Policy and Environment, Long Range Planning at ext. 75274.

The Senior Management Group has reviewed this report.

May 21, 2015

Attachments (4)

6096859

Accessible formats or communication supports are available upon request

**York Region - Public and Stakeholder Comments – ‘What was heard’
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

Preliminary Comments (including Public Open House Feedback, June 2014)				
Identifier	Date Received	Source	Comment Summary	Supported Themes
1	January 13, 2014	Public	<ul style="list-style-type: none"> • There is a need for local public consultation. This opportunity to express the views and needs of our township to the Region and the Province is simply too important to leave entirely to the professional staff alone. • It is more accurate to state that King’s very survival as a rural community depends almost entirely on the strength of both pieces of legislation! If King were to lose the protection of the legislation then I believe that our peaceful, rural community of communities would very soon disappear. • It is vital that the experts and stakeholders in these areas, such as the Holland Marsh Farmers, the environmental organizations, the 51 horse farm owners, numerous cattle farmers etc., citizens and the Chamber of Commerce etc. be consulted for their detailed input. • Both STORM [Save the Oak Rides Moraine Coalition] and CCKT [Concerned Citizens of King Township] have also earned the right to be consulted in this matter, before any comments are sent up the line. • While it is helpful to suggest that certain policies need to be changed, it is the local municipality’s responsibility to actually provide the details regarding how they should be changed. How can we possibly expect politicians and bureaucrats at the province and the region to know how to change them if we, the folks at the coalface, do not actually state exactly what we wish to change? What do the farmers and equine industry actually need? What do we want regarding recreational uses and technical guidelines? By this I mean that we should provide the wording of the new policies where appropriate. 	<ul style="list-style-type: none"> • Need for comprehensive consultation and review process • Maintain/Improve the integrity of the Provincial Plans
2	June 18, 2014	Public	<ul style="list-style-type: none"> • The current protection of these areas under the Greenbelt Plan and ORMCP are just not being enforced, so companies are able to just destroy these priceless and necessary lands which are so vital to our survival. • We need the prime farmland for fresh food, especially when it will be too expensive to transport produce from thousands of 	<ul style="list-style-type: none"> • Improve implementation, monitoring and enforcement of the Provincial Plans • Maintain/Improve the integrity of the Provincial Plans

			<p>miles away--and we need this very fresh local produce grown under conditions that are well regulated and trusted. Local agriculture, if well planned, can also contribute substantially to our local and provincial economies--and to keeping our people physically and emotionally healthy.</p> <ul style="list-style-type: none"> • We also need the green space for our physical health and psychological well-being. • How can we be so short sighted and lax as to sell off what we need instead of being constructive about finding other ways to build factories and places for people to live. There are plenty of areas in towns and cities that would benefit from development. • The plans to protect these areas need to be firmly enforced. Builder applications should be turned down on farmland and protected natural green space. If construction goes ahead without permission, it should be stopped on the first day so that no one can make a mockery of our democratic guidelines and legislation. 	
3	June 17, 2014	Stakeholder Conservation Authorities Moraine Coalition	<ul style="list-style-type: none"> • The Greenbelt Plan and Oak Ridges Moraine Conservation Plan have been effective in delineating natural heritage systems, key natural heritage features and/or hydrologically sensitive features and protect these areas from incompatible development and use. • Improve consistency in interpretation and application of the policies and definitions throughout the Plan areas <ul style="list-style-type: none"> ○ For example, there has been no clear direction provided on integrating the use of related tools such as site alteration and fill by-laws (i.e. site grading and filling) • There are inconsistencies in the technical papers supporting the implementation of the provincial plans. <ul style="list-style-type: none"> ○ For example woodland edges are defined as the tree trunk line in the ORMCP but the Greenbelt Plan uses the drop line as the woodland boundary. • It is recommended that the terminology and interpretations in the ORMCP and Greenbelt Plan be harmonized. • The Province should consider providing implementation training workshops or webinars on interpretation of the Provincial Plans • It is also recommended that the Province establish a website listing the most current policy interpretations, to be updated on 	<ul style="list-style-type: none"> • Improve consistency between Provincial Plans • Provide tools and resources to guide implementation of Provincial Plans • Develop a process to confirm or correct Provincial Plan area and designation boundaries • Proposed new policy area

			<p>a regular basis</p> <ul style="list-style-type: none"> • Flexibility for rural uses is generally lacking in the two plans. • The Province should provide more support (i.e. financial, educational, tools) to farmer’s and landowners with implementing Best Management Practices on their properties to support the objectives of the plans • Greater emphasis on the link between the ORMCP and Greenbelt Plan and the protection of water quality in the Great Lakes and Lake Simcoe should be included • Implementation policies within the two plans should be revised. The Province should provide greater direction on “no reasonable alternative” and add policy requirements for enhancement and compensation when key natural heritage or hydrologic features are negatively impacted. • The ORMCP and Greenbelt Plan should include additional policies related to green energy installations (i.e. wind farms, solar farms) • Should the Province undertake any adjustments to the boundaries of the Plans, it should be done on the basis of the best available science, mapping and field investigations to allow for the accurate identification of the habitats of species of concern and endangered species and provide them with appropriate protection based on a natural heritage systems approach. • There should be greater oversight and regulation of commercial fill activities in Ontario. The plans should address this issue from a policy perspective. • Section 48 of the ORMCP Transition provisions should be “sunset” within approximately two years. • With the approval of Source Protection Plans and subsequent conformity amendments to municipal Official Plans • In light of the provincial approval of Source Protection Plans (SPPs) and the subsequent municipal conformity amendments, the Province needs to consider ORMCP Section 28 Wellhead Protection Areas and Section 29 Areas of High Aquifer Vulnerability, to determine if these sections are now redundant and should be superseded by approved SPPs. • Section 10 (10) of the Oak Ridges Moraine Conservation Act, preventing appeals of the Minister’s decisions on the conformity 	
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**York Region - Public and Stakeholder Comments – ‘What was heard’
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			<p>amendments, should be maintained and indeed, extended to conformity amendments of other Provincially-required plans such as the Greenbelt Plan and SPPs)</p> <ul style="list-style-type: none"> • It is recommended that additional policy direction be added to the Greenbelt Plan and ORMCP to allow for entrepreneurial approaches to preserve cultural heritage landscapes, heritage structures and their adaptive re-use. • In general, it is important that natural heritage systems and natural heritage feature protection policies remain strong and that Protected Countryside lands of the Greenbelt Plan continue to be protected for their agricultural and food security values. <p>The ORMCP should be revised so that the policy support found in the GP for parkland and trails is explicitly included in the ORMCP. The GP policy 4.6.2(b) and the ORMCP policy 32 (1) 5 should also be amended to facilitate conveyances to public bodies for cultural heritage landscapes and structures, parkland and trails in addition to the existing provisions for natural heritage conservation.</p>	
4	August 24, 2015	Stakeholder Concerned Citizens of King Township	<ul style="list-style-type: none"> • Concerned Citizens of King Township (CCKT) raised awareness of the Oak Ridges Moraine as a significant landform in the late 1980’s. We continue our vigilance of the health and protection of the Oak Ridges Moraine today (we similarly support the Greenbelt and Niagara Escarpment). • One of the strengths of the ORMCP is its science-based, prescriptive and regulatory foundation, providing a clear map of where development can and cannot occur across the landscape based on conservation science. • The objectives of the plan set out the importance of protecting the ecological and hydrological integrity by mapping of the areas with the highest conservation values on the Oak Ridges Moraine and providing a strong regulatory framework. • One of the main weaknesses of the ORMCP is the jurisdictional fragmentation of the Oak Ridges Moraine. It is difficult to achieve consistent interpretations and decision-making approaches to conservation planning with 24 municipalities and Councils. • Further, due to the technical nature of the plan, many small municipalities do not have the appropriate environmental and 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans • Provide tools and resources to guide implementation of Provincial Plans • Develop a process to confirm or correct Provincial Plan area and designation boundaries • Proposed new policy area

			<p>planning resources needed or the funds to hire appropriate staff to implement the Plan.</p> <ul style="list-style-type: none"> • For these reasons we hold there is a need for greater oversight and guidance by the province: at this time a Provincial Commission is needed, similar to the Niagara Escarpment Plan, which would provide the requisite expertise to implement the plan at a lower cost to taxpayers (as opposed to the status quo, requiring each municipality hire the expertise needed for effective plan implementation). • To date, the province has not released data regarding the performance of these plans. Without this data it is difficult to assess the performance of the plans, nor to provide valid evidence for relaxing any policies within them. <p><u>Implementation of the Oak Ridges Moraine Conservation Plan and Greenbelt Plan</u> Move to a Commission Model</p> <p>The Province should change the model under which the Plan is managed, moving to a Commission model similar to the Niagara Escarpment Commission.</p> <p>Consistency</p> <ul style="list-style-type: none"> • There is a lack of consistent implementation of the policies for both the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan by municipalities. <p>Need for expertise across the ORM</p> <ul style="list-style-type: none"> • It is very costly for municipalities to hire specialized staff to ensure policy planning expertise is available or to hire consultants. Interpreting the plan requires specialized planning knowledge • A commission model would allow specialized staff to be hired to maintain a consistent implementation of the policy framework and lessen the likelihood of OMB hearings surrounding policy interpretation. <p>Authority of Conservation Authorities</p> <ul style="list-style-type: none"> • Conservation Authorities currently do not have authority beyond 	
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			<p>regulation to assess the impact of development proposals unless the authority is designated by a municipality.</p> <ul style="list-style-type: none"> • Conservation Authorities are governed by a Board of Directors made up of landowners and politicians, decisions seem to be economically based, rather than consistent with conservation based criteria. <p>Compliance</p> <ul style="list-style-type: none"> • Currently there is a lack of compliance monitoring or evaluation of the Plan by municipalities to assess any change in the ecological integrity, or to ensure municipal compliance. • A single implementation body is more likely to be able to provide monitoring, compliance and evaluation of the effectiveness of the plan(s). • Further, a one-window approach is consistent with the current provincial model for administration of provincial ministries. Municipalities do not have the staffing to monitor compliance with Oak Ridges Moraine policies (e.g. Sec 25.2). <p><u>Removing Prime Agricultural lands</u></p> <p>The Province should amend Section 5.3. in the Greenbelt Plan to restrict downzoning of agricultural lands to rural lands beyond bringing the plan into conformity with the 2005 GB plan and the PPS.</p> <p>We have provided draft amendment wording for consideration below:</p> <p>Municipalities may amend the designation for prime agricultural areas and/or rural areas at the time they bring their official plans into conformity with this Plan, only in the following circumstances:</p> <ol style="list-style-type: none"> 1. If the upper-tier or single-tier municipality has not amended the designation for its prime agriculture/rural lands to reflect the PPS; 2. If an upper-tier or single-tier has completed a comprehensive official plan review; or 3. In order for a lower tier official plan to conform to an upper tier 	
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			<p>plan which has been amended in either of the above circumstances.</p> <p>Such amendments are intended to be minor in nature, solely with a view to rationalizing prime agricultural area and rural area boundaries.</p> <p><u>Definition Recommendations</u></p> <p>Develop a planning definitions directory for the Provincial plans.</p> <p>Refine the following definitions:</p> <p>Wetlands: Amend provincial land-use plans and related legislation to use one consistent definition of “wetlands.”</p> <p>Rural compatibility: Provide a test to determine if a use is compatible with the rural area, level of noise, traffic, and need for infrastructure.</p> <p>No reasonable alternative: This is too vague a term and must be clarified. There should be a series of tests to determine that there is no reasonable alternative.</p> <p><u>Proposed Improvements to Policy</u></p> <p>Need for Monitoring Data</p> <ul style="list-style-type: none"> • At this time, the Province has not released monitoring and evaluation indicators. • We need a comprehensive picture of how land use and conservation criteria have been performing to achieve the goals of hydrological and ecological integrity and agricultural protection since the Plans were enacted. • To date, it appears the Ministry of Natural Resources and the Ministry of the Environment have not been complying with the statutory requirement for monitoring. • Without a transparent monitoring and evaluation framework for all three plans, we do not have the data necessary to enable us to be confident in relaxing any policies. Select municipal data 	
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			<p>indicate that we continue to lose farmland within the Greenbelt. We do not support any removal or swapping of lands within the Greenbelt.</p> <p>We encourage growing the Greenbelt to include natural heritage lands or Prime Agricultural lands at risk where the Greenbelt provides greater policy protection.</p> <p>Without the data we have to be careful that policy changes do not weaken the intent or objectives of the plan(s). Changes should reinforce and strengthen weak areas.</p> <p>We support strengthening policies in the following areas: water policies, aggregates, fill, infrastructure including transportation corridors, industrial energy and waste disposal projects, and limiting residential and commercial sprawl. We support policy changes that help lead to a clear and more consistent implementation and are consistent with the intent of the plan.</p> <p>Infrastructure</p> <ul style="list-style-type: none"> • Industrial energy projects, pipelines and highways are a significant threat to the Oak Ridges Moraine. • We support the Oak Ridges Moraine Foundation Infrastructure policy recommendations, including an amendment to section 4.11 of the ORMCP to allow the relevant approval authority the ability to refuse a project. • Further, environmental impact studies and assessments for infrastructure projects should lose points for crossing or being located within the Oak Ridges Moraine and Greenbelt areas. • We also support the need for technical guidelines on how to apply the ‘need’ test and the ‘no reasonable alternative’ test. <p>Sewage and Water Infrastructure Policies</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Maintain and strengthening policy 4.2.2.2. of the Greenbelt Plan. Where settlements do not currently have Great Lake and Lake Simcoe based water and sewage services, no expansions or extension of services is permitted. The capacity of services 	
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			<p>will be restricted to that required to service the existing settlement area plus the capacity to develop within the approved settlement boundary as it existed when the Greenbelt Plan came into effect (2004).</p> <ol style="list-style-type: none"> 2. In existing and new development in rural settlements and hamlets on private servicing, in the case of failed on-site servicing, to protect public health as determined by the medical officer of health (or health authority) the community must upgrade existing on-site servicing, if possible. If not feasible, a municipal communal sewage system should be required which limits the negative impacts of development and which recharges the hydrological system. 3. To reduce the need for expansion of costly infrastructure, consider allowing partial servicing on lots greater than two acres within a settlement area in the ORM Greenbelt Plan area with the requirement that the municipality implements a septic inspection program. <p>Rural Areas</p> <ul style="list-style-type: none"> • With the inclusion of density and scale definitions and/or technical guidelines for recreation and commercial uses in the countryside, rural area policies should consider expanding the range of small scale commercial uses in countryside areas under section 40, including small scale cultural enterprises such as art galleries, eco-tourism uses, granny flats and home industries using existing buildings, that do not require significant additional sewer and water infrastructure and are compatible with the rural area. • Rural commercial uses which require additional buildings should be directed to hamlets. • CCKT has heard many complaints from rural land owners about noise (especially from bars and nightclubs adjacent to farms), dust from trucks, traffic from commercial businesses and commuter traffic affecting farm businesses. Conflicts between uses in rural areas needs to be considered when expanding the range of permitted uses in a rural area. • The delineation of agricultural areas or hubs within Official 	
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			<p>Plans may be helpful in managing the separate and conflicting uses between commercial uses and agriculture.</p> <ul style="list-style-type: none"> • We support allowing a second dwelling on a farm property for the use of farm managers and workers. • We also support the provision for locating home businesses in existing buildings on the site. • CCKT supports the recommendations made in section 4.5.7 of Fred Johnson’s evaluation to develop technical guidelines. • Natural Core and Linkage area policies should incorporate additional policies to take into account aesthetic values, similar to what is reflected in the Niagara Escarpment Plan. <p>Recreational Policies</p> <p>Low Intensity Recreational uses</p> <ul style="list-style-type: none"> • Scale and density of allowable uses considered within the definition of low density recreation should be better defined. Numerous examples support the need for this clarification. • Riding dirt bikes and snowmobiles on trails is a common outdoor recreational activity on the Moraine, but is it a permitted use? <p>Case in point: The Boots and Heart Festival, Orono http://weblink.clarington.net/WebLink8/0/doc/61520/Page1.aspx The Boots and Heart Festival organization leases land and sells camping passes for 10,000 to 20,000 people camping on an unserviced 65 acre parcel, in a natural linkage and countryside area of the ORM. The intensity of the use does not appear to be low density nor is it public or institutional camping. It is unclear if campgrounds are permitted, as the Plan specifies camping on public or institutional lands: does this exclude commercial campgrounds?</p> <p>To clarify what is a low density use, consider incorporating standards from other provincial statutes to provide density standards for unserviced campgrounds. Tourism Act R.S.O. Reg. 1037 Sec 9 (4) specifies campsites at campgrounds should be at least 186 square metres. It would also be helpful to provide directions on how</p>	
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			<p>to read this section of the Plan, e.g. if the use is not identified as a recreational use and it is commercial in nature, then direct the reader to a section on commercial uses to determine if the use is permitted, or whether it should be directed to a settlement area. Planners are frequently looking to find where a use fits, hence the Plan needs to be precise on whether or not a use is permitted.</p> <p>Major Recreation</p> <ul style="list-style-type: none"> • Interpreting major recreational uses on the Oak Ridges Moraine was recently a matter before the Ontario Municipal Board, PL13037. • The Board found that a banquet hall or wedding facility was not a major recreational use. • This OMB hearing may have been prevented if the ORMCP provided clearer directions for municipalities interpreting this section of the plan. • Technical guidelines including clarification of the type, scale and density of the uses permitted and those not permitted would have been helpful. <p>Settlement Area Policies, Small Scale Uses</p> <ul style="list-style-type: none"> • We agree with Fred Johnson’s report to the ORMF and the Township of King that there is a need for technical guidelines to assist municipalities in applications regarding natural heritage features in Settlement areas. • While some flexibility in reducing the requirements of natural heritage and hydrological evaluations would be helpful to landowners, we do not support the assertion made by the Township of King that there is a need to waive application requirements for small scale uses. • CCKT holds it is important to manage these development proposals to protect and enhance areas with key natural heritage features. • The Oak Ridges Moraine Conservation Plan states that Settlement areas have the objectives of maintaining, and where possible, improving or restoring the health, diversity, size and connectivity of key natural heritage features and ecological functions: this should be the objective of the planning department when reviewing these applications. 	
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			<ul style="list-style-type: none"> • Further, we agree with the ORMF’s observation that planning applications should be tracked and monitored to determine the impact of small scale uses before we consider waiving application requirements. <p>Water Policies</p> <ul style="list-style-type: none"> • We recommend the Province consider incorporating the ORMCP water policies into the GB plan area. • Further, we ask that the three Provincial land use plans and the Ontario Water Resources Act approval mechanisms be amended to require that the impacts of water takings, under the Permit To Take Water process, be considered concurrently with land-use planning approvals and require applicants to demonstrate that they have met the requirements under Sec 24 and 25. Further, cumulative impacts of water taking should be routinely monitored by the Province. • It is unclear how watershed plans and water budgets are being used when considering development applications and how they are to be incorporated into the Official Plan. • It is also unclear who is monitoring water budgets, both pre-development and post-development. • The impacts of climate change should be considered in the 2015 review especially as it relates to water policies. • We support the recommendations in Fred Johnson’s November 2013 report for the ORMF as they relate to water resource policies. <p>Natural Heritage</p> <ul style="list-style-type: none"> • We support strengthening and updating natural heritage policies in the plans. • The Greenbelt Foundation commissioned a study of wetland protection. We support its recommendations to strengthen policies in the Greenbelt including: <ul style="list-style-type: none"> • Maintain or enhance current legal and policy protections for wetlands across the Oak Ridges Moraine/ Greenbelt. • Enhance protection by incorporating the strongest policy of the three Plans. • Amend the Greenbelt Plan to clarify policies for recreational uses adjacent to wetlands. For consistency, amend 	
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			<p>Provincial land use plans to include thresholds for triggering natural heritage protection and environmental studies. Provide additional guidance to municipalities and conservation authorities.</p> <ul style="list-style-type: none"> • The Ministries of Municipal Affairs and Housing and Natural Resources should coordinate their efforts to: (1) Finalize the draft technical guidelines for existing natural features; and (2) Provide additional guidance on natural heritage systems planning. • Enhance educational outreach and providing mapping resources to municipalities and conservation authorities by the Ministry of Natural Resources. The Ministry of Municipal Affairs and Housing should showcase best practices in municipal policy and enable improved communications and information sharing across Greenbelt municipalities. • The Ministries of Municipal Affairs and Housing and the Ministry of Natural Resources should update and coordinate their efforts to finalize the draft technical guidelines for existing natural features, and provide additional guidance on natural heritage systems planning. <p>Tree Bylaws</p> <ul style="list-style-type: none"> • While many municipalities have implemented tree bylaws, all municipalities should be required to implement them. Tree preservation of woodlands should be monitored regionally and reported bi-annually. <p>Maintain and Restore Areas of Natural Scientific Interest (ANSIs)</p> <ul style="list-style-type: none"> • The Ministry of Natural Resources identifies ANSIs that are 'provincially significant' by surveying regions and evaluating sites to decide which have the highest value for conservation, scientific study and education. • There were concerns brought forward when the draft ORMCP was being reviewed that it would be difficult to implement unless these areas followed lot lines. • Currently these lot lines are being used by the Township of King planning department as a rationale to further reduce the 	
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			<p>protection of these Areas of Natural Scientific Interest (ANSI).</p> <ul style="list-style-type: none"> • This is an example of an area where some municipal land use planners admittedly lack the expertise to implement planning applications as noted in Section 3.1 of this report. <p>We ask the province to consider two options:</p> <ol style="list-style-type: none"> 1) Use the Commission model to implement the Plan; or, 2) Provide specific and detailed information and guidance to planning departments on how to manage planning applications in an ANSI. <p>Boundaries</p> <ul style="list-style-type: none"> • CCKT supports maintaining existing boundaries of settlement areas in the Oak Ridges Moraine and Greenbelt Plan areas. • The Places to Grow Plan identifies land in our existing urban areas for continued growth to meet our growth needs beyond the next policy review in 2025. • Intensification of the existing GTA urban centers with regular regional and local bus and train service should be the focus of growth rather than rural settlement areas located within the Greenbelt and Oak Ridges Moraine. • Settlement areas near agricultural areas should be encouraged to support employment uses from the agricultural industry. No lands should be removed from the Greenbelt or swapped within the Greenbelt: at least a decade of development lands are currently designated within our Official Plans. • The Township of King was inappropriately allotted urban center intensification targets by the Region of York, despite our lack of regular transit services and local water and sewer services in all communities except King City. • The ORM and Greenbelt Plans are based on a systems approach to protect ecological features. • In the case of the ORM, supportive lands are required for a healthy agricultural system (natural heritage lands in the case of the Greenbelt). • Maintaining these supporting systems allows us to continue to protect the areas of provincial interest and areas with high conservation values. 	
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			<p>Transitional Policies</p> <ul style="list-style-type: none"> • We support the Province incorporating a sunset clause (5 years) to enable grandfathered approvals to proceed or be revoked after a five-year period. <p>Site Alteration and Landfill</p> <ul style="list-style-type: none"> • The long-term effects of landfill and contaminated landfill in particular, may have a significant impact on the hydrological and ecological integrity of the Moraine. • We recommend that large scale fill be subject to the same scrutiny as major development on the Oak Ridges Moraine. • Areas with high aquifer vulnerability and groundwater recharge should be protected from large scale landfill operations. Small scale landfill is used for agricultural operations and should not be subject to the same scrutiny as major development on the ORM. • In order to manage these issues the Province should provide guidance to ensure municipalities have incorporated site alteration bylaws that are consistent with Provincial policy under the MOE. • The province should initiate sharing of best practices across the Moraine and provide bylaw templates for municipalities to ensure the Moraine is protected from illegal fill operations and contaminated fill. <p>Harmonization of the Plans</p> <ul style="list-style-type: none"> • It should be made clear that harmonization aims to improve the consistency of the Plans and their implementation, not dilute the effectiveness of any one Plan. • The Oak Ridges Moraine Plan should retain its objectives of ecological integrity while protecting hydrological functions. • We support retaining the natural core and natural linkage designations and harmonizing countryside policies. Whenever possible, we encourage the province to use the more restrictive policy except regarding agricultural policies for prime agricultural areas. • CCKT realizes that to maintain and support a thriving agricultural industry there will need to be more flexibility in the Oak Ridges Moraine Plan. 	
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			<p><u>Township of King Issues</u></p> <p>Removing Lands from the Greenbelt for Strategic Employment lands</p> <ul style="list-style-type: none"> • King Township is requesting that the Region of York lands at Highway 400 and King Road be changed from countryside Greenbelt lands (agricultural use) to strategic employment lands. At this time the need for additional strategic employment lands has not been identified in the Region of York Official Plan to 2031. • The Township of King Official Plan Review process has just begun (December 2013) and a growth management study has not been undertaken to determine if lands are needed for employment outside of our existing community plans. • Each of our serviced rural settlement areas (Schomberg, Nobleton and King City) has significant acreage of employment lands available. • From an economic development perspective, agriculture employs more people in King than any other sector. The objectives of the Greenbelt Act (section 5) are to sustain the countryside, rural and small towns, and contribute to the economic viability of farming communities. • The Places to Grow Plan directs strategic employment lands to areas where there is existing infrastructure to limit sprawl and costly expansion of water and sewage infrastructure. • We do not support removing lands from the Greenbelt for additional strategic employment lands within King Township at this time or within the period of the next 10 year review (2025). <p>Infrastructure</p> <ul style="list-style-type: none"> • In CCKT’s experience, agriculture and natural heritage areas are fragmented by the incursion of industrial infrastructure into our protected areas. • The Oak Ridge Moraine and Greenbelt are protected, yet our experience indicates that this protection is quickly withdrawn for projects considered to be for the greater good such as highways, industrial gas plants or sewer pipes. 	
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			<ul style="list-style-type: none"> • While we understand the importance of infrastructure for our cities there are usually better alternatives within our protected areas. • We encourage the next iteration of the Greenbelt Plan and ORMCP to provide tests to limit infrastructure within or crossing the Greenbelt and Oak Ridges Moraine. <p>Agriculture</p> <ul style="list-style-type: none"> • Within the Township of King, agriculture employs more people than any other industry, yet agriculture is not considered an employment use under the Planning Act. • We find this exclusion of agriculture to be a major impediment in our ability to plan for agriculture in our Official Plan, and as a continued employment use within the Township. • Furthermore, the loss of the provincial agricultural tax credit funding for municipalities discourages Municipal Councils from valuing agriculture as a land use by its negative impact on the assessment base. <p>Greenbelt Plan Challenge</p> <p>A landowner is challenging the Greenbelt Plan, as the Township of King's Official Plan Amendment 58, which was approved by Council but not approved by the upper tier municipality, York Region.</p> <ul style="list-style-type: none"> • The applicant claims the Greenbelt Plan was not in force and effect, as it had not been approved by the planning authority. Further, the applicant is proposing to designate this rural countryside area as a hamlet to enable the development of a seniors' retirement community. • The Township of King and Conservation Authority reports do not support the position of the applicant and Council refused the application. Although an application was made to the OMB, it is currently on hold by the applicant. • This application is an example where the OMB continues to be perceived by developers as a tool to override good planning, with applications not being consistent with the provincial plan. 	
5	June 16, 2014	Public	<ul style="list-style-type: none"> • More weight should be given to the lands along Woodbine Avenue, both East and West sides, between Davis Drive and Green Lane. 	<ul style="list-style-type: none"> • Develop a process to confirm or correct Provincial Plan area and designation boundaries

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			<ul style="list-style-type: none"> • These lands are strategically located to existing services and Provincial Infrastructure. Developing to the North, as proposed by this OPA, would create a “Leap-Frog” scenario and in this writer’s opinion, would not be a good planning strategy. 	<ul style="list-style-type: none"> • Encourage/Support optimal use of infrastructure and land/resources
6	June 4, 2014	Public	<ul style="list-style-type: none"> • The Oak Ridges Moraine Conservation Plan should be enforced • Why do we continue to allow buildings to be erected on the Moraine? • We either need to protect it or not. It makes very little sense to keep amending legislation when we don’t enforce it anyway. 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans
7	June 26, 2014	Public	<ul style="list-style-type: none"> • There is not enough being done to stop the building on the Moraine and in the Greenbelt. • When these plans were put in place I actually thought that there would be regulations put in place to end the destruction of the moraine, but that was not the case as there was always some loophole found so the buildings just kept going up. This has got to stop now; stricter rules must be put in place and actually adhered to! 	<ul style="list-style-type: none"> • Improve implementation, monitoring and enforcement of the Provincial Plans
8	July 23, 2014	Stakeholder York Agricultural Advisory Liaison Group	<ul style="list-style-type: none"> • The Greenbelt and strengthened PPS policies with respect to prime agricultural land will likely result in more situations where there are compatibility issues in the future, where a relatively hard line has been drawn to delineate where urban development will not occur in the foreseeable future. • These urban-agricultural conflicts will lead to a need to protect the agricultural viability of the Greenbelt or Prime Agricultural lands as lands abutting the boundary with urban development. • There should be policy in the Greenbelt Plan dealing with appropriate strategies to preserve agricultural viability on the edge of the Greenbelt, and to protect agricultural and residential or other sensitive uses from each other through buffering or some other sort of transitional uses. 	<ul style="list-style-type: none"> • Proposed new policy area • Maintain/Improve the integrity of the Provincial Plans
9	February 17, 2014	Stakeholder Save the Oak Ridges Moraine	<ul style="list-style-type: none"> • Our groups feel it is necessary for this review to be conducted with strong public participation and stakeholder involvement. 	<ul style="list-style-type: none"> • Need for comprehensive consultation and review process

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		(STORM) EarthRoots EcoSpark Ontario Nature		
10	June 16, 2014	Public	<ul style="list-style-type: none"> • I am in favour of protecting the farm lands, green fields and other natural areas. • I am against commercial and residential development occurring in these spaces even if it is close to the 400 series freeways or the highways (The 404 or Highway 48 for example). This would create even more traffic, pollution and make the environment worse. • Currently there are insufficient roads that cross the 400 series freeways that make it safe for cyclists. I biked to the Stouffville Public Information Centre from Newmarket and biked back. Getting over the 404 by bike is a challenge without taking a road that is an interchange. • An even greater difficulty is going over the 400 by bike without an interchange. The only road that goes under the 400 within King Township is 16th Sideroad. There is no easy way of biking from Newmarket to Caledon or Brampton and it would be beneficial if this changed. 	<ul style="list-style-type: none"> • Develop a process to confirm or correct Provincial Plan area and designation boundaries • Proposed new policy area
11	June 10, 2014	Public	<ul style="list-style-type: none"> • Almost everyone I know in the region is not very happy with all the new construction, planned construction and objections to obviously already approved construction (ie. the Lloyd Street 4-6 storey condo) • I am retired, and go to Stouffville during the day & find it very hard to make a left hand turn in town. Traffic is horrendous any time of day/night and will only get worse. If new construction must be completed, why not at either end of town, to avoid more congestion in town and use #48 or 10th Line etc. to reduce Main Street problems. Elderly people already find it hard to cross the street in town, as well as mothers with carriages/toddlers. 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans

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			<ul style="list-style-type: none"> • We are losing all our natural beauty, water, farm properties and our most proud of our "country close to the city" town, but even that title too is in jeopardy. • It appears to me and many, many others, that "you can't fight city hall" and that the "powers that be" are only interested in the almighty dollar and not with people's actual wishes and there is nothing we can do in any event but move north & wait for the same situation to follow. • I had thought that several years ago, all construction on the Moraine was to have stopped? Must have been a dream on my part. 	
12	June 10, 2014	Public	<ul style="list-style-type: none"> • I was shocked to learn that there was a suggestion to start commercial development in the highway 400 and king road intersection. This area is NOT a candidate for development. The area is supposed to be protected under the Greenbelt Plan and Oak Ridges Moraine Conservation Plan. • What kind of protection is there in a document that can be manipulated to accommodate the agenda of development? 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans
13	June 3, 2014	Public Open House Participant	<ul style="list-style-type: none"> • Agriculture (crops, animals) requires water. Currently our (OH) water supply (sewers, aquifers) is challenged under extreme seasonal dry weather. Sustainable agriculture has 2 alternatives: <ol style="list-style-type: none"> 1) Reclaimed water (unlimited supply) 2) Match crop to irrigation method to optimize water use e.g. drip vs. spray avoids evaporation • Particularly relevant since Oak Ridges Moraine holds headwaters to Region's key systems 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans
14	June 3, 2014	Public Open House Participant	<ul style="list-style-type: none"> • Would like to see the 404 corridor – Stouffville side – protected including a green corridor across from Richmond Hill – N of Gormley – S of Ballantrae. • Would be open to consider swap for strip of land on W side of 48, Walmart to Main St., for development – as special employment opportunity such as a university satellite campus. 	<ul style="list-style-type: none"> • Develop a process to confirm or correct Provincial Plan area and designation boundaries
15	June 3, 2014	Public Open House	<ul style="list-style-type: none"> • We would like to see more financial help or resources towards managing environmental threats – i.e. Emerald Ash Borer – 	<ul style="list-style-type: none"> • Provide tools and resources to guide implementation of

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		Participant	<p>Asia Long horn beetle – so we can be even better land stewards.</p> <ul style="list-style-type: none"> • Stronger (more teeth) dealing with violations i.e. illegal, polluting, littering. • No “Fracking” Policy • Generally we think the Plan is a success, we want to see it continue 	<p>Provincial Plans</p> <ul style="list-style-type: none"> • Proposed new policy area
16	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> • It is unclear if the Region will be recommending removal of the Greenbelt designations along 400 series highways so that commercial/industries can be accommodated. • The province should not remove land from Highway 400 and the King Rd. It is obvious from the mapping of the Greenbelt Plan that there was political pressure to make sure that this area was not included in the ORMCP. All around is CORE area. How convenient that it was omitted. Although the Greenbelt Plan offers a lower level of protection, it should remain and the Region should not be pressing for its removal. • The Region should be hiring environmental planners to make sure that the ORMCP and Greenbelt Plan requirements are being met – and not leave this important work to be attempted by each municipality. 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Provide tools and resources to guide implementation of Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans
17	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> • I am concerned with your [the Region’s] suggestion to remove Greenbelt lands and convert them to development lands (big box stores, warehouses?) along Hwy 400 into King Township particularly near the King Road intersection. Given the parameters that the area within the Oak Ridges Moraine and Greenbelt may NOT be decreased, how do you propose finding other land to replace such areas? • Many Ontarians support the plans. • There are however, areas that can be revised to improve the lot of farmers, habitat, economic viability and protection. 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans
18	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> • There is no indication that land at 400 HWY & King Road could be removed from Greenbelt – This should not be removed since it is next to natural core area designation. • In fact, the land at 400 HWY & King Road should have been 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement

			designated as part of the moraine – odd that this land was not included & now under consideration.	of the Provincial Plans
19	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> The provisions of the Greenbelt Plan and the ORMCP protect the rural landscape, natural environment and farming land for the benefit of healthy land, air, water, wildlife and the health of all Ontarians. The result of the 2015 Review should further enrich the protection policies of these Provincial Plans and further support implementation capacity (funding + planning tools) for Land Trusts, conservation authorities + municipal agencies to achieve the goals + strategies of these plans. Implementation of these Provincial Plans to date has been progressive, but there be much more to accomplish to meet the goals + strategies. It is important that York Region + provincial government stand fast together to avoid errors + weakening of environmental policies. In view of the ever continuing pressures of urbanization and consumption of resources, it is imperative that York Region + Ontario government continue to protect (secure + steward) our significant natural areas and prime food lands. We must serve to leave a sustainable environment as a healthy legacy for our children and future generations. 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans Improve implementation, monitoring and enforcement of the Provincial Plans
20	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> There needs to be policies + actions to support the economic viability of farming. Too much “protected” land is owned by developers who in turn lease it out. <ol style="list-style-type: none"> Developer gets tax credit for land being farmed and then can charge whoever they choose for rent. The person farming the land is not committed to the land, to being a good steward as it is not their land. Price of “farm land” is too high to allow new young farmers to start an enterprise. Equestrian functions need housing for staff There is a lack of monitoring and assessing cumulative impacts. The legislation says there will be monitoring. Should consider Niagara Escarpment Commission model for ORM – ensures high level competency + consistency 	<ul style="list-style-type: none"> Improve implementation, monitoring and enforcement of the Provincial Plans Encourage/Support optimal use of infrastructure and land/resources Provide tools and resources to guide implementation of Provincial Plans

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			<ul style="list-style-type: none"> The Oak Ridges Moraine Conservation Plan and Greenbelt Plan are different – seek to accomplish different things. The science behind the ORM must not be downgraded to accommodate the Greenbelt. 	
21	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> I believe a reduced tax classification should be given to property owners whose land is in the Oak Ridges Moraine. This should include the entire value of land and buildings – not just the surrounding vacant land within the property when the reduced rate is applied. For properties that are not 100% in the ORM, a pro-rated calculation should be made (e.g. 50% in ORM then a reduction is applied to 50% of MPAC evaluation) I also believe the site plan approval process should be less complicated. 	<ul style="list-style-type: none"> Provide tools and resources to guide implementation of Provincial Plans
22	June 10, 2014	Public Open House Participant	<ul style="list-style-type: none"> In existing settlement areas with Great Lake or Lake Simcoe based servicing; servicing should not extend beyond the settlement area boundaries. In existing and new development in rural settlements and hamlets on private servicing, in the case of failed on-site servicing to protect public health as determined by the medical officer of health (or health authority) that the community upgrade existing on-site servicing if possible, if not feasible, that a municipal communal sewage system be required which limits the negative impacts of development, recharges the hydrological system. No development requiring water and sewage services will be permitted in areas that are not suitable for long term provision of services (e.g. natural core, natural linkage, high aquifer vulnerability areas or landform conservation areas). As a minimum, development may be considered if it maintains the water budget and achieves protection and preservation of the Moraine’s important water resources, air and significant Natural Features over the long term. Oak Ridges Moraine Conservation Plan/Act - A review under Subsection (3) shall not consider removing land from the natural core areas or the natural linkage areas and shall not consider removing land from areas of high aquifer vulnerability. Development should be focused in approved settlement areas 	<ul style="list-style-type: none"> Encourage/Support optimal use of infrastructure and land/resources Maintain/Improve the integrity of the Provincial Plans

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			with fixed boundaries. Lands within the settlement areas of high aquifer vulnerability, natural core, or landform conservation areas shall be protected and preserved.	
23	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> I am opposed to further development on the Oak Ridges Moraine. Enough of the “grandfathering”. 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans
24	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> I believe the plans have been effective in protecting agricultural lands and reducing sprawl in a smart way. I am a strong supporter of the protection of natural heritage features. However, that being said, I believe there is room for improvement. Boundaries drawn by the Greenbelt Plan need to be improved. I understand land cannot be removed from the Greenbelt, but the restrictions on these properties located on the edge should be adjusted and “buffered”. 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans Develop a process to confirm or correct Provincial Plan area and designation boundaries
25	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Stronger environmental and agricultural protection Need better monitoring and enforcement of plans to ensure effectiveness of policies More clarification and policy guidance (from province?) to reduce inconsistent interpretation across municipalities Stronger regional coordination of plans policies across Greenbelt geography 	<ul style="list-style-type: none"> Improve implementation, monitoring and enforcement of the Provincial Plans Improve consistency between Provincial Plans
26	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Support ideas of no future development and continued protection of the Greenbelt and Oak Ridges Moraine 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans
27	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> I am entirely opposed to anymore development of the Oak Ridges Moraine. Please let’s stop this now. We need our green space. We need our trees. 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans
28	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Would like to see greater consideration and support for uses within the Greenbelt and ORM related to facilities (institutional, public and private) that rely on or use the natural features and/or landscape of these areas for the educational, social and economic benefit of local communities and businesses in the plan areas. 	<ul style="list-style-type: none"> Provide tools and resources to guide implementation of Provincial Plans Proposed new policy area

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			<ul style="list-style-type: none"> Economic value of the plan areas (related to economic spin-offs of environment) should be more strongly recognized in plan preambles and objectives. 	
29	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Would like to see province set-up indicators on Greenbelt Plan and ORMCP, similar to what they did for Places to Grow. This will help effectively monitor the performance of these places as specifically required in the Plans themselves. It will also assist in having a meaningful and effective review. 	<ul style="list-style-type: none"> Improve implementation, monitoring and enforcement of the Provincial Plans
30	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Along the 404 & Stouffville Road there is “countryside” land on the west/Richmond Hill side. It sandwiches between the 404 & the new Go Station coming to Gormley in the next 1-2 years. (Metrolinx has already acquired and begun process) This is local employment land in Richmond Hill and has no significant natural linkage/core areas and mainly is flat countryside land. There is a significant new development and employment land to the north of this area along the 404 and it makes no sense to skip this area since there is now even a Go Station along with the 404 and its ramps right next to this property. 	<ul style="list-style-type: none"> Develop a process to confirm or correct Provincial Plan area and designation boundaries
31	June 11, 2014	Public Open House Participant	<ul style="list-style-type: none"> Plans are entirely inappropriate in that they have taken away property value unnecessarily. Property values have at least doubled outside of Plan areas and have been cut in half within the plan areas. Those who gain from increased property values should compensate those who have experienced decreases in value within the Plan areas. Tax relief should be considered for landowners within Plan areas. Each landowner should be provided with a small percentage of their land for development (i.e. 5 acres) Government should have paid landowners affected by Plans Concern expressed over statement that “Amendments to the Plan shall not have the effect of reducing the total land area of the Greenbelt Plan”. 	<ul style="list-style-type: none"> Proposed new policy area
32	January	York Region	<u>Successes/Opportunities</u>	<ul style="list-style-type: none"> Need for comprehensive

	30, 2014	Stakeholder Workshop Summary Comments	<ul style="list-style-type: none"> • The plans provide certainty and permanence: <ul style="list-style-type: none"> ○ For example, the GB will always be a certain size, the ORM’s core and linkage areas will be maintained ○ A legal line has been drawn in sand; it has already been vetted and it is now law with statutory backing ○ It respects the importance of the issues they’re supposed to address • The plans provide limits to growth: <ul style="list-style-type: none"> ○ Before the ORCMP was passed, groups were worried about many development applications and unfettered growth ○ The passing of the plan has enabled some level of certainty and provided a structure on how to plan • Landowner maturation: <ul style="list-style-type: none"> ○ The plans have protected values and provided a degree of certainty ○ Landowners have now had time to live with the plans and their values have also stabilized <p><u>Weaknesses/Threats</u></p> <ul style="list-style-type: none"> • Public resistance to intensification <ul style="list-style-type: none"> ○ Lack of affordable housing - is it the Plans’ fault? A growth issue? A perception? • Tree-cutting <ul style="list-style-type: none"> ○ Lack of consistency in tree-cutting bylaws across region, some municipalities have no tree-cutting bylaws • Sustainable Livelihood <ul style="list-style-type: none"> ○ Plan is often not flexible enough to allow for expansion of small businesses and institutions that foster innovation ○ Public support can be gained through flexibility and agri-tourism • Need more clarity and better definition in regard to boundaries <ul style="list-style-type: none"> ○ Example: plan says boundaries can be “refined”, there is confusion as to what that means <ul style="list-style-type: none"> ▪ How can a boundary be “refined” if area cannot be removed from a feature? • Settlement area boundaries and linkage area definitions and mapping unclear 	<p>consultation and review process</p> <ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve consistency between Provincial Plans • Provide tools and resources to guide implementation of Provincial Plans • Develop a process to confirm or correct Provincial Plan area and designation boundaries • Improve implementation, monitoring and enforcement of the Provincial Plans • Proposed new policy area • Encourage/Support optimal use of infrastructure and land/resources
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			<ul style="list-style-type: none"> ○ Data and more precise mapping from the ministry is needed ● Business expansions (legal, non-conforming uses) <ul style="list-style-type: none"> ○ Higher level of policy change- Oak Ridges Moraine and Greenbelt applications ● Water balance calculations <ul style="list-style-type: none"> ○ More accurate calculations are needed ● Shortage in land supply <ul style="list-style-type: none"> ○ Clearer rules on appropriate uses in white belt lands ○ Using growth areas for what they are intended for ● Interpretation <ul style="list-style-type: none"> ○ Community liaison? ○ Ministry of Municipal Affairs and Housing’s role in interpretation ○ Data/baseline and monitoring ○ How do we make changes without data from province? ○ Inconsistency in definitions and vagueness ● “Whitebelt” lands (not green or urban): <ul style="list-style-type: none"> ○ There was a lot of discussion about the “whitebelt”, e.g., whether it was framed as a void to be developed or was it implied development certainty ○ There was agreement that the intentions behind it was not clear, produced as a land budget and an exercise of pragmatism ○ There is no policy framework and it is triggered through the planning process ○ Growth Plan includes populations and tables, but it does not deal with urban boundary expansions in the “whitebelt” ○ Comprehensive Growth Plan Strategy: <ul style="list-style-type: none"> ▪ Who will make the decisions around growth? ▪ It gets tested at the OMB ▪ Municipal land budgeting exercise ● ORMCP – bylaws: <ul style="list-style-type: none"> ○ ORMCP is a land use policy that is implemented by zoning bylaw ○ Things fall through the cracks, e.g., woodland protection, landform conservation, site alteration ○ Municipalities don’t have the tools to enforce if there 	
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			<p>isn't a proper bylaw</p> <ul style="list-style-type: none"> • Micro-planning: <ul style="list-style-type: none"> ○ Addressing policies that hinder the livelihood of landowners, e.g. overly onerous process, timing and costs ○ There needs to be more guidance and discussion on these issues ○ There needs to be trust to be able to open up policies and increase flexibility without having a blanket prohibition ○ A mechanisms would have to exist in the plan that puts limits to its use/abuse ○ Questions: Do you get the province involved? Do you have different thresholds? ○ Increasing the flexibility of the permitted uses may not directly impact the intent of the ORMCP (e.g., severances in settlement areas) but its outcome may (e.g., land fragmentation with severance) ○ A potential solution would be to have it scoped out with some tests and criteria that is outcome based (this was done successful in Caledon) ○ Ultimately there needs to be trust that people are doing the right thing, especially if they are dealing with it based on the outcome • Public Education: <ul style="list-style-type: none"> ○ There is a gap in public education ○ There are different stories being told through different perspectives ○ There is also confusion of historical decisions that may/should have an impact on current or future decisions ○ Who's responsible for public education? ○ There is a need to paint a clearer picture of reality, e.g., there is often a romanticized view of farming that is not accurate to the present-day realities of farming • Agricultural Industry: <ul style="list-style-type: none"> ○ The agricultural industry has changed, e.g., farm sizes have increased, there are cash crops and non-resident farming 	
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			<ul style="list-style-type: none"> ○ The agricultural policies that were put in place at the time need to evolve with the changes to the industry ○ The countryside needs to be seen as a working countryside ○ Creation of non-abutting severances: <ul style="list-style-type: none"> ▪ Who is going to have the historical memory to know that was there before, what was approved before it changed? ▪ Fragmentation of the countryside – not the intended vision of the plan ● Climate Change: <ul style="list-style-type: none"> ○ there is no adaptability to climate change and it is not being dealt directly by the plans but should be ● Limits of land-use policy <ul style="list-style-type: none"> ○ We may be reaching the limits of what land-use policy can achieve ○ The planning system really only addresses “maintain” in “maintain, improve enhance/restore” (ORMCP) ○ Other activities are needed to support the landscape, e.g., achieve “improve and restore” through things like trails, community development, stewardship, etc. ○ There is tension between agriculture and natural heritage ● Home-based businesses ● Natural heritage boundaries/system → define it then delineate it ● Update transition dates ● Growing the Greenbelt authority at local level or remain with Region of York ● Greenbelt Plan Amendment #1 made no sense ● Blanket approach to prohibition of extending services through the Greater Toronto Area ● Unintended consequences of leapfrogging with the boundary of the Greenbelt ● For public → Both plans are very complex to explain in larger context (NOTE: group specified that this comment should not be interpreted to say that the plans should be simplified or “dumbed down” for the benefit of public understanding) ● need to establish consistent approach to buffer areas in settlements compared to rural 	
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			<ul style="list-style-type: none"> • Adding parkland dedication for features? • Enforcement <p>How Plans add value & related challenges:</p> <ul style="list-style-type: none"> • Establishes good foundation for protecting natural & agricultural lands in GGH through prescriptive, science-based policies • There are policies in place to protect the environment, but implementation is a challenge • Tourism opportunities have grown <ul style="list-style-type: none"> ○ Awareness and appreciation for the natural environment and for the system ○ However, tourism is limited by policies, Oak Ridges Moraine Conservation Plan limits activity to low-intensity (example: Bed and Breakfasts with less than 3 bedrooms) • Oak Ridges Moraine Conservation Plan provides ground rules for where development can/cannot occur <p>Agriculture /Farming</p> <ul style="list-style-type: none"> • Plans could be more supportive of agriculture • Disconnect exists between agriculture vision and objectives and the more specific policies in the Plans • Plans should reflect clear intent that the farming in the Plan areas need to be promoted as a thriving, growing industry and not just maintaining the status quo • Agri-Tourism is a clear value added component of the rural area that needs more thought and clarity in the plans • Need more accurate mapping of natural heritage features • Need definition for value added • Need more flexibility for municipalities to be able define agricultural uses that best fit the realities of their community • Better education of public • More interpretation/technical support from the Province • Review process needs to get more input from farm community <p>Infrastructure /Fill</p> <ul style="list-style-type: none"> • Policies are too loose on infrastructure-Are we turning the ORMCP and GBP into infrastructure plans like the Parkway Belt plan? 	
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			<ul style="list-style-type: none"> • Policy intent needs to provide balance in decision-making that strives to better meet intent of Plans- should always seek policy results to protect ecological integrity and farm community • Need definition for clean fill and better direction on the fill process • Eliminate duplication- EA Act Vs ORMCP and GBP processes • Clarification of fill use as it relates to the Aggregate Resources Act • More interpretation/technical support from the Province <p>Employment Lands</p> <ul style="list-style-type: none"> • GBP needs to address long term shortages for industrial/commercial lands-No shortages now but will be in the future • Having commercial on only one side of the 404 makes no sense , need to maximize capacity opportunities where possible • Need to look at ways to intensify employment land uses • Need better definition of industrial land • Need to provide more flexibility-e.g. possible swap of natural corridor lands for countryside • Protection of prime agricultural land and natural heritage features a priority • More interpretation/technical support from the Province <p>Reconciliation of Legislation and Regulation</p> <ul style="list-style-type: none"> • Need to identify why and where ORMCP and GBP need to be reconciled • Need to provide better linkages between the GBP and the ORMCP as well as to other related legislation, plans and regulations- e.g. SWPP, LSPP, EAA, CWA(PTTW),ARA, GP, Green Energy Act • Need clarity around Fill issue • Harmonization-definitely for the definitions • CA role needs recognition and clarification • Need more flexibility around settlement area expansion to maximize infrastructure limitations/opportunities • More interpretation/technical; support from Province • ORMCP perceived as regulatory vs. GBP which is more a policy document- why the difference 	
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			<ul style="list-style-type: none"> • Need greater guidance on the hierarchy of plans and clarification where overlap occurs • More interpretation/technical support from Province <p>Locating Facilities Outside Urban Lands</p> <ul style="list-style-type: none"> • Should we look at allowing certain uses in rural areas where the use is too land consumptive in the urban area- e.g. cemeteries, sport facilities, municipal work yards? • Would such uses meet the intent of the GBP and ORMCP? • Can we look at these uses if they were subject to certain conditions such as: <ul style="list-style-type: none"> ○ Protection of natural areas, prime agriculture, hydrology ○ Condition of approval is to provide natural enhancement as an offset benefit ○ Demonstration that location in rural area more effective and/or essential in specific locations) e.g. work yards need to be close to community to ensure immediate snow plow, road servicing? • Harmonize definitions and requirements in both plans • Would mega sports facilities be appropriate in rural areas or could they be broken up and scattered throughout communities in urban areas • More interpretation/technical support from Province <p>Other Discussions</p> <p>Positive Aspects of the ORMCP and GBP</p> <ul style="list-style-type: none"> • Provide strong , clear policies for protection of the natural environment and prime agriculture • Provide clear visions • Provide clear messages on overall growth strategy for the GTA • A value based approach • Clearly defines and protects unique, special attributes of the area • Provides a permanency/defines limits to urban growth/defines mature state vision • Provides a greenbelt system of international prominence • Has general widespread public support <p>Other Things Needing Improving</p>	
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**York Region - Public and Stakeholder Comments – ‘What was heard’
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

			<ul style="list-style-type: none"> • Should we consider more flexibility in expansion of hamlet areas-if yes what are the rules of engagement? • Leapfrogging of development over the GBP still a concern • Consistency in establishment of buffers in all designations • Ensure Province provides real opportunities for consultation as part of the 2015 review • Need real technical support from the Province in terms of data management support, policy interpretation, monitoring, mapping • Some feel plans are too complex and could be simplified or at least better explained to the public • How do we get the right tools into the right hands e.g. zoning by-law implementation techniques, tree cutting by-laws • Too much microplanning-lighten up on the small stuff- let municipalities use more flexibility, discretion • Better delineation of outside and designation boundaries- better ground truthing • More funding for municipalities and Oak Ridges Moraine Foundation 	
33	September 14, 2014	Public	<ul style="list-style-type: none"> • Growth must be controlled and placed in strategic areas adjacent to existing developments and infrastructure: regardless to where the lands fall in the Greenbelt or ORM. • Development should occur in a controlled manner next to highways and existing developments that would support this new building. • Good clear land that is not treed or wet should be looked at for these purposes. • Omitting this approach just encourages "Leap-frog" development to other Municipalities and will result in longer travel times, more expensive servicing and sprawl. 	<ul style="list-style-type: none"> • Encourage/Support optimal use of infrastructure and land/resources

Comments Received during the 2015 Coordinated Provincial Review Process				
Identifier	Date Received	Source	Comment Summary	Category
34	March 20, 2015	Stakeholder Oak Ridges Moraine Partnership for 2015	<ul style="list-style-type: none"> Our policy position is centred on recommendations intended to improve the environmental policies that protect the Greenbelt (i.e., Oak Ridges Moraine and Protected Countryside) and build strong and resilient communities within the GGH. The past 13 years of the plan’s implementation has revealed a number of policy short-comings, gaps and loopholes that are not aligned with the purpose, vision or objectives of the plan. <ul style="list-style-type: none"> These issues include the destruction of neighbourhood forests, the large-scale movement and dumping of commercial fill, the approval of large-scale energy infrastructure, and water-taking for development on and off the moraine. The Oak Ridges Moraine Partnership for 2015 is calling for stronger laws to strengthen the moraine’s water, land and communities. <p>Improve Watershed Planning</p> <ul style="list-style-type: none"> Watershed plans are a key tool in water resource management. Currently, watershed plans are only required by moraine-based municipalities who anticipate major development in their jurisdiction (Section 24 of the ORMCP). This leaves many municipalities on the eastern moraine without watershed plans as they do not anticipate major development and/or do not have the resources to complete a costly watershed plan. Recommendation - That watershed planning be mandatory for all municipalities across the Oak Ridges Moraine and integrated into Official Plans <p>Improve the Permit To Take Water (PPTW) Process</p> <ul style="list-style-type: none"> In Ontario, permits are required by law if 50,000+ litres of water per day is taken from a lake, stream, river, pond or groundwater source (with exemptions). PTTWs, regulated by the Ministry of Environment and Climate Change, are not considered a land-use and therefore are not required to comply with the ORMCP. The current PTTW framework does not recognize the unique hydrological features and function of the Oak Ridges Moraine or 	<ul style="list-style-type: none"> Proposed new policy area Improve implementation, monitoring and enforcement of the Provincial Plans Maintain/Improve the integrity of the Provincial Plans Provide tools and resources to guide implementation of Provincial Plans

			<p>take into account the cumulative effects of water-taking.</p> <ul style="list-style-type: none"> • Recommendation: That all PPTWs granted on the Oak Ridges Moraine be consistent with the goals, objectives and water resource policies of the ORMCP and that their cumulative impacts be monitored <p>Strengthen Tree-cutting Bylaws</p> <ul style="list-style-type: none"> • While tree-cutting bylaws are currently required under the ORMCA and administered by lower or single tier municipalities, these bylaws do not need to conform to the vision and objectives of the ORMCP. • The bylaws are also not consistently enforced by municipalities on the Oak Ridges Moraine. Many have weak bylaws and a lack of capacity for enforcement which has resulted in a reduction the natural forest cover and the degradation and destruction habitats on the Oak Ridges Moraine. • Recommendation: That the Province require enhanced municipal tree-cutting bylaws that conform to the goals and objectives of the ORMCP <p>Support Rural Prosperity and Innovation</p> <ul style="list-style-type: none"> • There have been undue restrictions that have prevented local businesses from thriving and growing while supporting the ORMCP’s vision and promoting the moraine, e.g., with permitted uses at the small scale. • Furthermore, there is a need for the policies within the ORMCP to be updated to reflect new ways of doing business to foster innovation. • Recommendation: That the ORMCP policies support innovation for farmers and rural businesses through increased flexibility in permitted uses and their accessory uses <p>Maintain Internal Designations</p> <ul style="list-style-type: none"> • Clear definitions, a clear set of rules and criteria are needed to guide municipalities on how new lots can be created such that the process is transparent. • Section 15(1) in the ORMCP permits the “minor infilling” and “minor rounding out” of Rural Settlement Areas in the Countryside Areas but the terms are not defined by the 	
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			<p>Province.</p> <ul style="list-style-type: none"> • Recommendation: That no changes should be made to Settlement and Rural Settlement boundaries as per 2002 and that minor in-filling and rounding-out are allowed only for hamlets and villages <p>Prohibit Land Swaps</p> <ul style="list-style-type: none"> • Land swapping may be an issue at the 2015 Review, i.e., whether the review will allow for ‘marginal’ ORM lands to be swapped for lands that are perceived to be more ecologically significant. This may include lands that are internal to the Plan Area (i.e., land use designation changes) or external (i.e., lands in or out of the Plan Area). • Recommendation: That land swaps for development that are incompatible with the intent and objectives of the ORMCP be prohibited <p>Limit Aggregate Mining</p> <ul style="list-style-type: none"> • Aggregate extraction is not permitted in Natural Core Areas to protect its key natural heritage features. However this protection is not afforded to Natural Linkage Areas, which play a key feature in the function of the Oak Ridges Moraine’s natural heritage system. Furthermore, there is neither a standard nor a comprehensive bioregional strategy for the rehabilitation of retired and neighbouring aggregate pits on the moraine. • Recommendation: That new aggregate mining in Natural Linkage Areas be prohibited and that comprehensive rehabilitation of neighbouring pits be mandatory <p>Regulate Commercial Fill</p> <ul style="list-style-type: none"> • New development and infrastructure renewal in urban areas are generating significant amounts of excess soil materials, i.e., fill, that are being dumped on the moraine with the risk of contamination. • Many site alteration bylaws, administered at the lower or single tier level, are ineffective and do not contain provisions specific to the moraine. Furthermore, municipalities lack the resources for bylaw enforcement. • Recommendation: That new policies be developed for large- 	
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**York Region - Public and Stakeholder Comments – ‘What was heard’
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

			scale movement and disposal of fill with requirements for municipal by-law conformity	
35	April 6, 2015	Public	<ul style="list-style-type: none"> • It looks to me that land desecration is becoming part of the usual process and I am astonished by the fact that our elected supposedly people representatives’ even waste public time and money to entertain such proposals by some people from usually the 1% of the population. • I think it [the review of the ORMCP] should be done without delay and reinforced and made irreversible by no-one/anyone, because protecting the environment is equal to protecting ourselves. • There are some areas where you drive up the hill and down the hill and there is a small waterway running at the bottom. Now when an area is being developed all you can see are bulldozers flattening the land creating a monotonous area where small waterways are buried in cement pipes and flood lands are filled with dirt in order to obtain a few more square meters of back yard. • I hope that the government and I mean all levels of government, should respect 100% of the population not only the 1% and keep the remaining 99% just to pay taxes to support the elite. • A sociologist in the early 1800’s put together a few words: <ul style="list-style-type: none"> ◦ “Economic factors are at the root of all historical changes and very seldom they are to the advantage of the population” 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Improve implementation, monitoring and enforcement of the Provincial Plans
36	April 9, 2015	Stakeholder Markham Agricultural Advisory Committee	<ul style="list-style-type: none"> • The Province should protect the connectivity of agricultural systems in the same manner that the plan currently protects the connectivity of natural heritage systems. Agricultural systems should be defined holistically by including and connecting all elements that contribute to the viability agricultural system. • The Province should require edge buffers between agricultural lands and urban uses on the urban side of the property line that ensure the use of appropriate setbacks, vegetative plantings and fencing to protect the viability of agricultural businesses along the Greenbelt edge by mitigating against the urban impacts on the agricultural use in the same way that the MDS requirements mitigate against noise, dust, and other 	<ul style="list-style-type: none"> • Provide tools and resources to guide implementation of Provincial Plans • Proposed new policy area

			<p>impacts of the agriculture use on the adjacent urban use.</p> <ul style="list-style-type: none"> The Province should add tools in the plan that will improve the viability of the agricultural industry. 	
37	March 2015	Stakeholder Golden Horseshoe Food and Farming Alliance	<ul style="list-style-type: none"> Forty-three percent of the Greenbelt lands are farmed. Farm families operating 5,500 farms not only conduct their business producing food but are stewards of large areas of natural heritage features, water, woodlands and wildlife. Local food for the growing population in the Golden Horseshoe is supplied from this region. Urban and rural residents need each other as 65% of the food produced on Ontario farms provides urban jobs in food processing. Modern Ontario farms produce more than food, with over 200 products from food to fiber, energy and nutraceuticals, all contributing to the health and viability of Ontario communities and economy. Primacy of Agricultural lands needs stronger protection – The intention of the original Greenbelt plan was to reduce the disappearance of Canada’s best agricultural lands and protection of watersheds areas from residential, commercial or industrial development and road construction. While the plan has gone a long way to protect environmental features, the primacy of agricultural lands and activity within the Greenbelt must be encouraged and supported as equally as natural heritage features and systems. Definitions and policies in the plans should align with the PPS 2014 - The 4 plans were written at different times and for different purposes. Contradictions and confusion arise especially when the plans overlap. The Provincial Policy Statement expresses the support for agricultural uses that will continue to keep agriculture viable. The language and definitions of the plans should be updated and consistent with the PPS. Connectivity of agricultural systems must be maintained – The plans currently protect the connectivity of natural heritage systems. Fragmentation of agricultural lands will lead to the demise of farm operations. Farmers cannot survive if they are 	<ul style="list-style-type: none"> Maintain/Improve the integrity of the Provincial Plans Improve consistency between Provincial Plans Encourage optimal use of infrastructure and land/resources Proposed new policy area

			<p>surrounded by urban boundaries. Agricultural systems must be defined and connectivity between agricultural areas ensured.</p> <ul style="list-style-type: none"> • Appropriate Infrastructure must be part of modern Agriculture and Rural life in the Greenbelt - Access to natural gas, water, three-phase power and high-speed internet are essential to the operation of modern agricultural businesses. Families living within the Greenbelt require high speed internet access for school projects and the operation of small businesses. Without access to these supports, agriculture and the young people entering agriculture will move out of the Greenbelt. • Investment required in Environmental Farm Plan and Source Water Protection initiatives targeted at Greenbelt area – to further protect watershed areas in Oak Ridges Moraine and other sensitive areas, a reinvestment in the Plan should target Source Water, Watershed health and Climate Change mitigation. • Intensification of urban areas requires buffer zones between people and agriculture – Many of the farms in the Greenbelt are family farms that have been established for several generations. As development comes closer to the farmed area, appropriate buffer zones should be required from the developer and not from the existing farm business. MDS exists for livestock operations and siting of development. Reverse MDS should be considered for farms and development. 	
38	March 31, 2015	Stakeholder BILD & Ontario Home Builders Association	<ul style="list-style-type: none"> • We also hope that the Region will provide specific recommendations, similar to those put forward last year by Durham and Niagara Regions, that will be included as part of the formal provincial review. These Regions recommended the establishment of a set of quantifiable criteria for landowners and municipal governments by which existing and proposed Greenbelt designations can be assessed and measured to determine its appropriateness. • The Province has not disclosed to the public, how the boundaries were established and against what measures – 	<ul style="list-style-type: none"> • Need for comprehensive consultation and review process • Develop a process to confirm or correct Province Plan area and designation boundaries • Encourage optimal use of infrastructure and land/resources

			<p>whether they were scientific, politically motivated, based on expert opinion, and/or community request based.</p> <ul style="list-style-type: none"> • In addition, the industry believes that the final Schedule 1 of the Greenbelt Plan was unfairly adjusted, when comparing it to the Draft Greenbelt Plan mapping originally posted on the 2 Environmental Bill of Rights Registry. From the Draft to the Final Plan, there was a significant increase of Greenbelt designation, without a clear rationale or criteria to justify these lands being included in the Plan. Considering the significant amount of changes without clear criteria or evidence, added consultation should have been provided for the municipalities and affected landowners. This would have created more confidence in the Final Plan. • Also, as reiterated by our colleagues at the Ontario Home Builders' Association, the home building and land development industry has no intention of fighting the Greenbelt. On the contrary, we are of the view that now is the opportunity to look at potential ways to improve the Greenbelt – its character and overall integrity, in areas where it makes sense to do so. • In the five-year anniversary update of the Growth Plan, the province noted that, "because of the magnitude of growth that is forecast, it will be necessary to bring new lands in to the urban envelope. The Growth Plan outlines a series of tests and criteria to ensure that expansions occur when necessary and where most appropriate, and in a way that ensures that infrastructure is in place and the natural environment is protected." The province has established how critically important the "whitebelt" lands in the GTA are in supporting the long-term future demographic and economic growth when rational planning requires and permits urban expansion to occur. We hope that York Region will echo our sentiment that any reductions to the "white-belt" to accommodate future growth will have an impact on population/employment allocations, and the associated and necessary designated housing supply needed to support it, which will ultimately challenge housing affordability and the GTA's economic competitiveness. <p>BILD RECOMMENDATIONS:</p> <ul style="list-style-type: none"> • BILD recommends that York Region request that the Province 	
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			<p>consult with stakeholders and establish a set of quantifiable criteria for landowners and municipal governments by which existing and proposed Greenbelt designations can be assessed and measured to determine its appropriateness.</p> <ul style="list-style-type: none"> • With a view to improving our current Greenbelt, BILD also recommends that York Region engage its stakeholders in a creative, collaborative and progressive conversation about potential additional land use options to expand public access and public use, on greenbelt and related lands, while still maintaining its integrity and significance. • BILD recommends that the Region echo our sentiments that the whitebelt is necessary to bring new lands in to the urban envelope and that any reductions to the "white-belt" to accommodate future growth will have an impact on population/employment allocations, and the associated and necessary designated housing supply needed to support it. This will ultimately challenge housing affordability and the GTA's economic competitiveness. 	
39	April 8, 2015	Stakeholder Counsel Public Affairs and Public Relations	<ul style="list-style-type: none"> • We believe that the Region of York should recommend that the Province of Ontario make regulatory adjustments which will allow sufficient flexibility to permit changes in land designation or swaps where they meet strict criteria and reflect the intent of the Greenbelt Plan, ORM Plan and the Growth Plan. • While the Review is not the forum for advancing site-specific considerations at this time, clients have instructed us to provide general comments pertaining to these types for properties for the Region of York to consider in submitting your views to the province. • We fully recognize the risks to the integrity of the Greenbelt/ORM of opening the doors too widely to such arguments for “special circumstances.” On the other hand, to not allow such factors to be taken into account at all will result in poor planning (e.g., more dispersed growth on rural lands rather than along major development corridors) and impairment to Core lands in the Moraine. • We believe that the Region of York should propose to the Province that re-designations and swaps be considered in the following very limited and defined circumstances, recognizing 	<ul style="list-style-type: none"> • Maintain/Improve the integrity of the Provincial Plans • Develop a process to confirm or correct Province Plan area and designation boundaries • Proposed new policy area

			<p>that very few properties will be able to meet these threshold tests.</p> <p>Proposed Approach</p> <ul style="list-style-type: none"> • Arising from the 10-year review, the Oak Ridges Moraine Conservation Plan and Greenbelt Plan should be revised to designate land Natural Linkage Area (Exception – Transitioned Applications) in the rare circumstance that such a change would further the objectives of the Oak Ridges Moraine Conservation and Greenbelt Plans, such as: <ul style="list-style-type: none"> ○ Scenario A: There are pre-existing development rights that are transitioned under the Oak Ridges Moraine Conservation Act which would allow a parcel of land currently designated as Natural Linkage Area to be developed for uses such as estate housing or golf course development. However, from both the owner's economic perspective and the Region's planning interests, it would make more sense to develop a minority portion of those lands to a higher standard or density in return for giving up all rights on the remainder of the lands. ○ Scenario B: There are lands designated Natural Core Area with similar pre-existing applications that are transitioned under the Oak Ridges Moraine Conservation Act, and adjacent proponent-owned lands designated Natural Linkage Area to which the development rights could be transferred in order to preserve the Core lands. <p>Under either scenario, we propose that additional criteria should be imposed to ensure that only in situations of true public benefit could such a trade-off be considered. These could include requiring that:</p> <ol style="list-style-type: none"> 1. The portion of such a parcel proposed for re-designation as Natural Linkage (Exception – Transitioned Applications) is adjacent to an existing Settlement Area; 2. The majority of the parcel (or combined parcels in the case of Scenario B) is to remain as Natural Linkage designation and to be transferred from private ownership by the proponent to public ownership by the proponent to public ownership by a municipality, conservation authority, provincial park, or public land trust; 	
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			<ol style="list-style-type: none"> 3. There are no ANSIs, Provincially Significant Wetlands or Significant Woodlands in the portions of the property to be re-designated as Natural Linkage (Exception – Transitioned Applications); 4. The portions of the property to be re-designated as Natural Linkage (Exception – Transitioned Applications) do not include an Area of High Aquifer Vulnerability or Wellhead Protection Area. <p>While not mandatory, additional considerations which would weigh strongly in consideration of such an application could include that:</p> <ol style="list-style-type: none"> 5. The remaining Natural Linkage lands are to be significantly enhanced in ecological quality (for example, by progressive restoration to Oak Ridges Moraine natural habitat lands such as Black Oak Savannah); 6. For any larger block of land (> 100ha) which constitutes all or a large portion of a linkage between sections of the Greenbelt, the land to be transferred to public ownership is sufficiently large as to allow a minimum wildlife corridor width of 600 metres in the main linkage corridor through the property; 7. The long term restoration of the Natural Linkage lands is to be funded by the proponent through a dedicated fund established at the outset and administered on a third party basis (e.g. through the Oak Ridges Moraine Land Trust or the Nature Conservancy); 8. In restoration of the lands, provision is to be made for enhanced pedestrian linkage through the natural lands to and between communities, schools and transit facilities, including connections with the Oak Ridges Trail where relevant; and 9. The result of the restoration and transfer plan will provide for greatly enhanced protection and restoration of the riparian areas on important watercourses in lands currently outside of public ownership. <p>Criteria for Adding Lands to the Greenbelt</p> <ul style="list-style-type: none"> • Finally, there has also been discussion about the potential for adding additional lands to the Greenbelt. While that is not the main focus for our clients, we believe that the Region should 	
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**York Region - Public and Stakeholder Comments – ‘What was heard’
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

			<p>urge the Province to target any such growth as follows:</p> <ol style="list-style-type: none"> 1. Any lands added to the Greenbelt should be on the <u>outside</u> boundary of the current Greenbelt, with the exception of urban river valleys already preserved under other authority. 2. No Whitebelt lands should be added to the Greenbelt at this time as these lands are reserved for potential future expansion once long term growth needs are identified. 3. Additions should be outside of any areas identified in the Growth Plan for the Greater Golden Horseshoe or municipal growth plans as reserved for urban expansion. 4. The priority should be on adding lands with clear Natural Heritage features. 	
40	April 1, 2015	Public	<ul style="list-style-type: none"> • We request on behalf of our client that the Ministry ensure that natural heritage feature designations are based on credible scientific analysis and where designations are only based on a desktop review that there be a mechanism for landowners to undertake appropriate environmental analyses to define such features through a planning process. • In addition, we request that the Ministry establish a policy mechanism that allows for appropriate changes to mapping of designations and features based on the above considerations and that there be a process to establish changes to the plans outside of the mandatory review period based on good planning principles. 	<ul style="list-style-type: none"> • Develop a process to confirm or correct Provincial Plan area and designation boundaries
41	March 31, 2015	Public	<ul style="list-style-type: none"> • That an amendment be made to the Oak Ridges Moraine Conservation Plan to include a policy which provides for a process under which existing and long standing land uses which have existed prior to the enactment of the ORMCP, but which do not necessarily comply with the existing zoning, Official Plan and the ORMCP Plan, can through an application process be converted to legal conforming uses. • Such a process should be administered by the local municipal and regional governments through the processing of Official Plan, Zoning, Site Plan and other planning processes as appropriate and be subject to the normal studies by which applications are evaluated. 	<ul style="list-style-type: none"> • Proposed new policy area • Develop a process to confirm or correct Provincial Plan area and designation boundaries

**York Region - Public and Stakeholder Comments – ‘What was heard’
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42	April 1, 2015	Public	<ul style="list-style-type: none"> • It is our request that the Greenbelt Plan be amended to include a process for the review of land use changes within the Greenbelt subject to appropriate criteria and a public process much the same as zoning or policy amendments are treated under the Planning Act. • The opportunity and ability to request an amendment to the Greenbelt permissions should be available to individual property owners either at the time of a 10 year review or perhaps throughout the tenure of the Greenbelt Plan. Applications could be administered by the local municipal government. 	<ul style="list-style-type: none"> • Proposed new policy area • Develop a process to confirm or correct Provincial Plan area and designation boundaries
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**York Region – Discussion Document Response
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

Review Goal Area	Discussion Question	Comment
<p>Section 4.1 PROTECTING AGRICULTURAL LAND, WATER AND NATURAL AREAS</p> <p>Our agricultural lands, lakes, rivers, wetlands and woodlands are finite and valuable resources that feed and provide drinking water to communities in our region and beyond. They provide important economic and ecological benefits, and improve our quality of life.</p>	<p>1. How can the plans better support the long-term protection of agricultural lands, water and natural areas?</p>	<p>In general, implementation of the complementary <i>Growth Plan, Greenbelt Plan</i> and <i>ORMCP</i> has been successful in promoting the protection of agricultural and ecologically-sensitive lands and encouraging the development of complete communities through ensuring that municipalities plan to contain growth within existing, serviced settlement areas, where possible.</p> <p>However, the Plans can better support the long-term protection of agricultural lands, water and natural areas by:</p> <ul style="list-style-type: none"> • Maintaining and strengthening policy direction to deliver complete communities within existing settlement areas. • York Region supports the Provincial position for no removal of Natural Core or Natural Linkage areas in the ORM and no reduction in the total Greenbelt Plan Area <ul style="list-style-type: none"> ○ The Oak Ridges Moraine Conservation Plan contains policies related to plan review and amendments. Specifically, the ORMCP states that ‘the 10-year review cannot consider removing lands from the Natural Core Areas and Natural Linkage Areas’. The Region supports this provision of the plan. • Adding a ‘sunset’ clause to the Transition policies of both the Greenbelt Plan and OMRCP for unapproved applications would further protect the integrity of the ORMCP and Greenbelt Plan areas and ensure that fragmentation of the agricultural and natural heritage systems does not continue. Both the Greenbelt Plan and ORMCP contain a number of provisions which enable applications made under the <i>Planning Act</i> to continue to be brought forward without being required to conform to the policies of the Plans. Considerable time has passed since the transition dates in the Provincial Plans (November 17, 2001 in the ORMCP and December 16, 2004 in the Greenbelt Plan), which has provided ample opportunity for landowners to act on approved applications. • Avoiding and mitigating urban-agricultural land use compatibility issues is an important part of proper growth management and is especially relevant in a growing region. The Province is encouraged to include amendments addressing the transition zone between settlement areas and permanent agricultural areas through the current review of the Greenbelt Plan and ORMCP in order to protect and promote agricultural viability, particularly as this issue is not unique to York Region.

		<ul style="list-style-type: none"> ○ The Province of British Columbia has produced a document entitled 'Guide to Edge Planning – Promoting Compatibility along Urban-Agricultural Edges', for planning at the interface of urban and agricultural areas. • Regional staff are pleased that the Province recognizes other acts and legislated plans that have overlapping objectives with these Plans. There are a number of targets included under the <i>Clean Water Act</i>, Lake Simcoe Protection Plan, Ontario's Great Lakes Strategy, the proposed <i>Great Lakes Protection Act</i>, and the Climate Change Discussion Paper which relate to policies within the Greenbelt, ORM and Growth Plans. With the significant number of plans and acts currently under review or development, the Province is encouraged to take a holistic, complex systems-based approach to ensure that any proposed regulations and plans provide an effective and balanced approach to achieving overlapping provincial objectives. • Stormwater needs to have greater focus within the update planning documents • Continuing to ensure that no reasonable alternative exists prior to siting new or expanding existing public infrastructure, including highways, transit lines, airports, railways, gas and oil pipelines, sewage and water service areas, power transmission and telecommunication lines throughout the Natural Core and Natural Linkage areas of the ORMCP (Section 41) and key natural heritage or hydrogeological feature of the Greenbelt Plan (Section 4.2), will further enable the protection of agricultural land, water and natural areas • Ensuring both inner ring and outer ring communities in the Growth Plan area are treated more similarly with respect to intensification targets and density requirements would reduce the attractiveness of leap-frog development by ensuring communities outside the Greenbelt are not permitted to grow in the sprawling, unsustainable form that the Plans are attempting to prevent. Reducing leap-frog development and ensuring compact, complete communities surrounding the Greenbelt will help to preserve agricultural lands and natural heritage features within the Greenbelt and beyond.
	<ul style="list-style-type: none"> • How can the plans better direct urban development to areas already developed? 	<p>Work completed to date on York Region's Municipal Comprehensive Review indicates that forecasted population and employment growth outlined in Amendment 2 of the Growth Plan can be accommodated with existing land supply (including 'whitebelt' lands) and without the need for lands from</p>

		<p>provincial plan areas.</p> <p>The Plans can better direct urban development to areas already developed by:</p> <ul style="list-style-type: none"> • Ensuring the planned and orderly progression of development, particularly in Urban Growth Centres in order for capital investments in public transit, road capacity improvements and water and wastewater servicing to be phased appropriately to support existing and future demand. <ul style="list-style-type: none"> ○ Through integration of policies 1.6.1 and 1.6.3 of the PPS 2014 into amended provincial plans, municipalities will be required to ensure that infrastructure is integrated with land use planning and optimized to meet both current and future demands. The Growth Plan should be amended to clearly reflect these PPS 2014 policies. ○ Furthermore, regional and local municipalities would benefit from greater control over the definition of “adjacent to” when determining whether a proposed use is adjacent to existing infrastructure in order to reduce demand for “unjustified and/or uneconomical expansion” and place stronger emphasis on maximizing existing infrastructure before relying on planned or future infrastructure. • The Province is encouraged to develop incentives for achieving greater density and intensification targets that are outlined in the Growth Plan. Furthermore, the province is encouraged to develop a set of tools (financial or otherwise) to incent intensification and redevelopment in favour of greenfield development and are encouraged to limit greenfield development until intensification targets are being achieved within the existing built-up areas.
	<ul style="list-style-type: none"> • Where are the opportunities to expand the Greenbelt both within urban areas, such as urban river valleys, and in rural areas beyond the Greater Toronto Area? 	<ul style="list-style-type: none"> • Growing the Greenbelt northwards into south Simcoe County would assist in preventing ‘leap-frog’ development from continuing to fragment agricultural and natural heritage systems <ul style="list-style-type: none"> ○ Furthermore, extending the existing Greenbelt Plan area into Simcoe County will encourage municipalities within Simcoe County to develop at a density that supports sustainable infrastructure provision and creates complete communities, as is the intent of the Plans. • The exclusion of lands in south Simcoe County from the initial

		<p>Greenbelt Plan area has likely resulted in accelerated growth or expansion of communities located directly to the north of the provincial plan boundary.</p> <ul style="list-style-type: none"> • There may be additional opportunities to expand the Greenbelt into settlement area designations to include protected parks, trails, forests, conservation lands, hydro corridors, etc. There is currently no Provincial designation for natural features/systems within the ORMCP Settlement area and this has created some policy implementation challenges at the local level regarding what is to be protected from development within the ORM Settlement area. Development of such a designation would require extensive consultation with regional and local municipalities to ensure that local interests would be protected. • The Province is encouraged to capture the implications of the federal Rouge National Urban Park within the Greenbelt Plan. Affected municipalities (e.g. York, Toronto, Markham) are incorporating provisions related to the National Park into their Official Plans to accommodate the new legislation Bill C-40 (pending) and the Province is encouraged to do the same.
	<ul style="list-style-type: none"> • What new approaches or tools could be used to protect agricultural land, water and natural areas? 	<p>There are a number of new approaches or tools that can be used to protect agricultural land, water and natural areas including:</p> <ul style="list-style-type: none"> • Supporting research efforts to develop a province-wide environmental health tracking system to collect and analyze indicators of environmental health. Such a system can identify linkages and support policies to protect human health and inform land use planning. It can also be used to increase public awareness of the health benefits in protecting water, natural areas and agricultural lands. • Utilizing cost-benefit analysis tools that quantify the benefits and risks associated with various land use options. For example, the Greenbelt Foundation recently commissioned a report - 2015 report – <i>Dollars and Sense: Opportunities to Strengthen Southern Ontario’s Food System</i>. This report identified that less imported produce translates into reduced transportation emissions, reduced environmental impact and increased economic benefits. More research is needed on the value of a local less carbon-intensive food supply from both an environmental and economic perspective. <ul style="list-style-type: none"> ○ An example of assessing economic value of natural capital associated with ecosystem protection can be found at

		<p>www.cleanairpartnership.org/files/Aurora%20CAC.pdf. The Town of Aurora assessed the economic value of their natural capital assets and found that the value of Aurora's natural assets is estimated at approximately \$7.4 million annually.</p> <ul style="list-style-type: none"> • In order to support the Region's effort to increase forest cover in York Region to 25% of the total land area by 2031, the Province is encouraged to identify mechanisms to support the achievement of a net gain of forest cover in Provincial Plan areas. The Province is encouraged to develop a no-net-loss approach to managing forest cover. Additionally, recognizing the importance of significant woodlands and urban forest canopy cover within the Growth Plan area is integral to supporting the delivery of complete communities. • Agriculture as an economic activity does not occur in isolation. Agricultural depends upon connections with the natural heritage system, transportation networks, businesses that serve the agricultural sector and that process, preserve and distribute agricultural products, as well as other land uses and economic activities. It is important for the Provincial Plans to acknowledge and sustain these connections in order to support the viability of agricultural activities and not simply preserve land that is viable for agriculture. <ul style="list-style-type: none"> ○ Protecting the connectivity of the agricultural system should be consistent with the Plans' current protection of the connectivity of natural heritage systems. • The Province should consider providing a dedicated source of funding to assist farmers with the development and implementation of Environmental Farm Plans (EFP). Currently, EFPs are completed on a voluntary basis and largely at the farmer's expense. Providing additional assistance to farmers to complete these plans would enable the Province to ensure the long-term protection and viability of agricultural areas in Ontario. • Since the ORMCP and Greenbelt Plan came into effect, additional Provincial legislation related to the protection of drinking water quality has been enacted. Specifically, the <i>Clean Water Act</i> (2006) and related assessment reports, have resulted in both updated and new mapping for Wellhead Protection Areas, Intake Protection Zones, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas. This updated science has formed the basis for the development of Source Protection Plans. The Province is encouraged to update section 42 of the ORMCP and Section 3.2.3 of the Greenbelt Plan as necessary to identify and
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		<p>resolve mapping and policy conflicts and terminology inconsistencies.</p> <ul style="list-style-type: none"> It is recommended that the Province develop a process or set of criteria to confirm or correct Plan area boundaries, including the outer boundary of the Greenbelt Plan, and designation boundaries within the Plan areas.
	<ul style="list-style-type: none"> How can we grow and strengthen the region’s network of open spaces to provide for recreational opportunities? 	<p>The Vision for the Greenbelt Plan clearly articulates that the Greenbelt is a broad band of permanently protected land which provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses. While the Greenbelt Plan to date, has been successful in protecting agricultural and natural heritage systems, there has been less emphasis placed on the importance of the Plan area for providing recreational opportunities to the residents of the GGH. Opportunities to grow and strengthen the region’s network of open spaces exist through:</p> <ul style="list-style-type: none"> Ensuring the goals of the Provincial Plans align with the goals and implementation plan of Ontario’s Trails Strategy. Strengthening Provincial policies that support a network of open spaces will ensure municipalities continue to meet the objective of developing as complete communities. Facilitating increased collaboration and coordination between municipalities, conservation authorities and community builders will help to recognize, protect and build open spaces and trails that will contribute to a complete network for residents of the GGH The Province is encouraged to promote the early acquisition and protection of open spaces in new community areas by municipalities. Once the land has been developed, the opportunity to deliver new open spaces in built-up areas is extremely limited. Through the Growth Plan, the Province may consider requiring that municipalities complete a Natural Heritage Study or Parks Master Plan to complete an inventory of existing natural assets and recreational opportunities and also to examine where opportunities may exist to deliver new recreation facilities as a community continues to build out. The Rouge National Urban Park (Rouge Park) is a good example of protecting the Greenbelt Natural Heritage System, as well as having objectives that are consistent with Official Plan policies designed to identify, protect and enhance a linked system of open spaces in an urban setting. The work supporting Rouge Park demonstrates the need for collaboration across all levels of government to ensure sufficient

		<p>infrastructure and agreements are in place to ensure the realization of these open spaces to support the delivery of complete communities. The Province is encouraged to continue to take part in and facilitate these connections across all levels of government in the GGH.</p> <ul style="list-style-type: none"> Regionally-significant open spaces or trails, such as the Lake to Lake Cycling Route and Walking Trail, should be recognized and supported by the Province, with protective policies within the Greenbelt Plan and ORMCP and/or through funding. The development of this regional-scale trail will further provide tourism opportunities with the Provincial Plan areas. It is recommended that the Province incorporate urban-agricultural interface policies into the Growth Plan to address compatibility at the interface of settlement areas and active agricultural areas, this may provide an opportunity to locate open space and trails within the proposed buffer area. Care should be taken to ensure that any policies developed in this area fully address and respect concerns of both farmers and residents of the adjacent settlement area (i.e. liability, fencing, trespassing, crossings).
	<ul style="list-style-type: none"> How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario’s economy? 	<ul style="list-style-type: none"> The agricultural protection that the plans provide supports local food production and procurement which decreases emissions associated with long distance transportation of food. Access to a dependable and affordable supply of nutritious food also contributes to people reaching their full physical and mental potential, and lowering their risk for chronic diseases, which results in direct savings to the Provincial Health Care system. The question asks how the agricultural protection in the plans can enhance the impact of agriculture on Ontario’s economy, however it is important to recognize that the plans protect lands that are capable of supporting agriculture, but do not support or protect the actual activities of farming and farm-related businesses. Simply precluding other uses from those lands does not ensure that farmers are able to afford the lands or to continue to farm within close proximity to increasingly dense settlement areas. Increased traffic and other conflicts with settlement, as well as the perceived agricultural/ecological conflict, are challenges to farming in the near-urban areas in the Greenbelt. Revised policies contained in the PPS 2014 permit a greater range of uses in Prime Agricultural Lands, supporting flexibility and resilience in the agriculture industry and the rural economy. Specifically, the updated

		<p>PPS 2014 introduced several new defined terms which recognize how farming is evolving. Examples include “on-farm diversified uses” and “agri-tourism uses”. Definitions such as “agricultural uses” and “agriculture-related uses” were also modified for the same purpose. Through these definition and policy modifications, the PPS now recognizes additional uses within prime agricultural areas which will enhance overall viability of the agriculture industry. With the support of the agricultural community, it is recommended that the Province make corresponding changes to the Provincial Plans.</p> <ul style="list-style-type: none"> • Providing appropriate infrastructure to support agriculture will enable agricultural systems to remain viable and continue to contribute to the local, provincial and national economy. Infrastructure such as broadband internet, an integrated transportation system to support goods movement, and providing adequate access to energy supplies and water is critical to supporting agriculture-related and on-farm diversified uses, as well as normal farm practices.
<p>Additional Consideration from Section 4.1</p>	<p>How do we stem the continued losses of agricultural lands?</p>	<ul style="list-style-type: none"> • Agricultural land is lost each year due to a number of developments that had previous approvals in place. A sunset clause on approvals which have been previously transitioned under the Greenbelt Plan and OMRCP that would have the effect of closing a number of previously-approved applications could assist in preventing the continued loss of agricultural lands.
	<p>Should we consider increasing <i>Growth Plan</i> density and intensification targets?</p>	<ul style="list-style-type: none"> • Densities must be high enough to support efficient transit use in order to deliver complete communities in the Greater Golden Horseshoe. Recommendations and rationale presented in the “Improving Health by Design in the Greater Toronto-Hamilton Area” report should be considered, specifically: <ul style="list-style-type: none"> ○ <i>“The Plan identifies that a potential majority, up to 60%, of new developments may be greenfield developments, which are to achieve a minimum density target of 50 people and jobs per hectare. According to the Transit Supportive Guidelines, this density can typically only support basic transit service with a bus every 20 to 30 minutes, yet these Guidelines state that there is a need to “plan for a level of transit coverage and service which is competitive with average automobile commuting times, including time walking to and from transit service. Essentially, there needs to be enough people living in an area to support the efficient</i>

		<p><i>placement of services that can be reasonably reached by walking or cycling” should be considered in the examination of density targets within the Growth Plan.</i></p> <ul style="list-style-type: none"> The Province is strongly encouraged to ensure that Growth Plan density and intensification targets align with Ontario Ministry of Transportation Transit-Supportive Guidelines minimum density thresholds for areas within a 5-10 minute walk of transit and are capable of supporting different types of transit service. Further, any increase in the Growth Plan density and intensification targets should be focused along key corridors or within Urban Growth Centres where access to efficient transit currently exists or is planned to be delivered in the near future.
	<p>Recognizing that <i>Growth Plan</i> targets set minimum baselines for the entire region, would a better approach be to encourage municipalities to go beyond the minimums?</p>	<ul style="list-style-type: none"> Standardized indicators should be used to assess where and how municipalities go beyond minimum targets in order to better monitor the achievement of compact, complete communities. This should go beyond simply measuring density and they could include healthy communities’ indicators, such as levels of active transportation and public transit usage. The various targets in the Growth Plan are clearly stated as minimum targets in the Plans. Yet, in practice, many municipalities have regarded Growth Plan targets as maximums in their respective forecasts, land budgets and official plans. To encourage planning for greater density and a higher level of intensification, the Province should consider making incentives available to municipalities that are aggressively planning for and achieving levels beyond these required minimum targets. <ul style="list-style-type: none"> Incentives could take the form of receiving priority consideration for infrastructure and transit investment and services in those municipalities, in order to further support the Growth Plan and Provincial objective of intensifying the GGH through the development of complete communities. Furthermore, the Province should encourage municipalities to go beyond minimum targets where transit and road infrastructure is already in place or is planned for to support and accommodate the increased density, specifically in identified Urban Growth Centres. This will also maximize the significant investments made by the Province to date to deliver projects under The Big Move. <ul style="list-style-type: none"> Outer ring municipalities in the Growth Plan should be held to the density and intensification targets that were initially envisioned by the

		<p>plan and not permitted to develop reduced targets. This would ensure that low-density leap-frog development does not negate the efforts being made elsewhere in the Greater Golden Horseshoe to modify built form and conserve natural heritage features and agricultural lands.</p>
<p>4.2 KEEPING PEOPLE AND GOODS MOVING, AND BUILDING COST-EFFECTIVE INFRASTRUCTURE</p> <p>Aligning land use planning and infrastructure, including transit, can realize cost savings, produce more vibrant communities, ensure the mobility of people and goods, and increase our region’s sustainability over the long term.</p>	<p>2. How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?</p>	<ul style="list-style-type: none"> • The Plans should be updated to provide definitions that are consistent with other legislation, across all Ministries, which has been passed or amended since 2005, including but not limited to: the <i>Clean Water Act</i>, <i>Lake Simcoe Protection Act and Plan</i>, <i>Endangered Species Act</i> and the <i>Green Energy Act</i>. • We agree with the importance of providing the best most cost-effective infrastructure (transit, roads, sewers, water) to meet the needs of the community. In terms of “keeping people and good moving” it is important to not only address congestion, but also to mitigate health impacts by reducing vehicle emissions that contribute to greenhouse gas emissions and local air pollution. • Plans should support <i>integrated technology</i> for road and transit networks at all levels (local, regional and provincial), including key transit providers TTC, Metrolinx and GO • All Plans need to be consistent with the 2014 PPS Policies, which will strengthen existing Growth Plan policies on the sequencing of development. Specifically, <ul style="list-style-type: none"> ○ Policy 1.1.3.6, which states that new development that is compact and adjacent to existing built-up areas allows for “the efficient use of land, infrastructure and public service facilities” ○ Policy 1.1.3.7 (b), which states that phasing policies should be implemented to ensure “the orderly progression of development... and the timely provision of the infrastructure and public service facilities required to meet current and projected needs” ○ Policy 1.6.3, which states “Before consideration is given to developing new infrastructure and public service facilities (a) the use of existing infrastructure and public service facilities should be optimized; and (b) opportunities for adaptive re-use should be considered, wherever feasible”. (SM/MH) • Policies should discourage “leap-frogging” of development and give priority to development that makes use of existing infrastructure and

		<p>public service facilities, before considering development that is not supported by existing infrastructure</p> <ul style="list-style-type: none"> • More focus is needed on the transportation demand side rather than supply (i.e. building more infrastructure), as it has been shown to be the most cost-effective use of transportation funds. A coordinated and comprehensive Transportation Demand Management provincial program would lead to more efficient use of existing infrastructure. • If municipalities conform to provincial Growth Plan projections, and do not adjust their plans to reflect slower growth on the ground, there is a strong risk that GGH municipalities will overbuild their infrastructure and be left with overcapacity and a much heavier than necessary debt burden. <ul style="list-style-type: none"> ○ For example, completing a major expansion of a wastewater treatment facility 5-6 years before it is needed can result in millions of dollars of unnecessary expenditures and a need for the municipality to carry the debt on that expenditure for a prolonged period of time. Achieving many of the density and intensification targets in these plans are dependent on the delivery and availability of water and wastewater infrastructure. • The Province needs to dedicate funding sources to implement transit in the GGH. Metrolinx’s <i>Investing in Our Region, Investing in our Future</i> (2013) outlined a number of tools that could be used to fund transit. The Growth Plan directs intensification to areas where transit is planned and now the Province needs to decide how it will fund the transit needed in the GGH to support the new type of urban form that is planned to support complete communities. • Providing more transit alternatives for people to commute using alternatives to the car, may assist by freeing up existing highway capacity for the movement of goods.
	<p>a. How can the plans better leverage transit investments across the region?</p>	<ul style="list-style-type: none"> • The Growth Plan promotes intensification that is transit-oriented. Most municipalities have completed or are in the process of updating their Official Plans to conform to the Provincial Plans. However, additional investment in transit infrastructure needs to occur. While the planning vision supports intensification that is transit-oriented, the transit infrastructure investments by the Province need to continue. • For example, both the York Region and Richmond Hill Official Plans have planned for an Urban Growth Centre (UGC) as directed by the Growth Plan serviced by the planned Yonge Street subway extension to

		<p>Highway 7. However, the subway extension to the UGC continues to go unfunded. To fully realize the densities and population to employment ratios envisioned in the Growth Plan in the UGCs, the Province needs to create a better transit funding formula to build the transit envisioned in Metrolinx’s The Big Move. This would enable the transit infrastructure to catch up with the transit-oriented planning that now exists.</p> <ul style="list-style-type: none"> • The Province is encouraged to provide incentives to municipalities to plan walkable and transit supportive communities. Consider changes to the Development Charges Act to require funding for incorporating Transportation Demand Management measures in all new developments. • The Growth Plan requires a clear definition of “orderly progression of development” to ensure that leap-frogging of development does not continue to occur and that takes into consideration the phasing and staging of infrastructure to support forecast growth • It is important that all Provincial ministries recognize the importance of approvals processes for infrastructure essential to meet the growth needs identified under the Growth Plan. Expedited approvals for growth processes will assist in meeting these growth requirements and support Provincial investments.
	<p>b. How can the plans better promote livable, walkable communities that use new and existing infrastructure in the most cost-effective way?</p>	<ul style="list-style-type: none"> • The Province should Promote and support Leadership in Energy and Environmental Design (LEED) and LEED for Neighbourhood Development (ND). LEED ND certifies neighbourhoods that exemplify mixed use, walkable streets, compact development, green-infrastructure, on-site renewable energy sources and solar orientation. • Aerial utility poles/transmission lines often hinder the creation of livable, walkable, and attractive urban communities. The Province should investigate how to address this through the Municipal Act, Electricity Act, Telecommunications Act, Public Service Works on Highways Act and associated policies to strengthen the Plans’ ability to enable municipalities to deliver attractive and complete communities • Compact communities minimize the total length of all linear assets, including water, wastewater, sidewalk and roads. However, research and recommendations are required to support developing communities with practical minimum widths of lots, and blocks, driveway lengths, right-of-way and pavement widths, to develop minimum recommended standards that adequately accommodate our changing winter conditions, typical persons per unit, on-street parking (one side vs both sides) to

		<p>accommodate our changing environmental and socio-economic environment.</p> <ul style="list-style-type: none"> • Promoting infill and brownfield redevelopment within existing settlement areas will ensure that existing infrastructure is being optimized. These types of development should be prioritized over greenfield development where the delivery of services is much more costly. • Continue to implement #CycleON Ontario's Cycling Strategy and developing funding programs such as the Ontario Municipal Cycling Infrastructure Program will enable residents to choose more sustainable modes of transportation and support municipalities in the delivery of cycling infrastructure. • Although the Region supports Policy 2.2.7.3 in the Growth Plan, which prohibits development within environmental features, the policy should be reviewed to clarify that infrastructure shall be permitted across these features to ensure that communities are connected and allow for transportation facilities to support walking, cycling and transit connections between neighbourhoods and to collector and arterial road networks which fit the context of the surroundings. • Planning tools can promote/direct the development of transit-oriented communities which reduce vehicle-kilometres-travelled and associated emissions of greenhouse gases and local air pollutants, support active transportation, promote physical activity, support multi-modal trips, and have reduced traffic casualty rates. It is important that sustainable modes of transportation (e.g. public transit, carpooling, cycling and walking) are accessible, affordable and available with supportive infrastructure (e.g. bus bike racks and shelters). • Strengthen the need for local municipalities to create a master plan of an "integrated access network" that connects planned transit, intermodal hubs, communities, key destinations, and services (CH) • The province can promote livable and walkable communities that use new and existing infrastructure in the most cost-effective way by quantifying the proposed growth of areas for intensification. This will allow municipalities to better plan cost-efficient servicing over the long-term and reduce the potential need for changes to infrastructure which will impact the livability and walkability of communities.
	<p>c. How can the plans align long-term infrastructure planning with planning for growth?</p>	<ul style="list-style-type: none"> • For the plans to do more to encourage best practices in infrastructure and growth planning across the Region, it is important that the Province recognize that these plans need to operate under a number of different

		<p>jurisdictions and municipal areas (e.g. stormwater is entirely within the jurisdiction of local municipalities but impacts Toronto, water treatment is Regional while distribution is local municipal). It would be beneficial for the Province to provide leadership in this area by developing a common set of principles for management of common infrastructure and growth planning issues such as stormwater management and water conveyance/treatment.</p> <ul style="list-style-type: none"> • The Province should consider providing incentives to municipalities that plan for and achieve greater density and intensification than the Growth Plan minimum targets. In order to encourage planning for greater density and a higher level of intensification, the Province should consider making incentives available to municipalities that are aggressively planning for and achieving levels beyond these required minimum targets. Incentives could take the form of receiving priority consideration for infrastructure and transit investments and services in those municipalities, in order to further support the Growth Plan and Provincial objectives of intensifying the GGH through the development of complete communities. • The Growth Plan is supported by Metrolinx’s The Big Move, which will also undergo a review following the Coordinated Land Use review. Referencing detailed studies within the Plans allows for progressive enhancements of the Growth Plan as supporting documents are adopted or approved. For example, updates to local Master Plans; MTO Area Transportation Needs Studies; Metrolinx updates may not be completed in step with the Growth Plan. As a minimum, any technical recommendations on infrastructure requirements, including but not limited to phasing and limits of transportation improvements presented in the Growth Plan should be supported with technical analysis. • An additional policy should be added to 3.2.2.4 that allows for new or refined transportation corridors to be included in the Growth Plan without revision to the plan. These corridors could be identified through, but not limited to sub-area assessments or Regional Transportation Master Plans, and be given equal consideration and authority to infrastructure identified in the Growth Plan at the time of its adoption. • Ensure that adequate funding is in place for required infrastructure to support projected growth. Therefore, financial budgets and planning need to align with the Growth Plan and the infrastructure that is planned in the Big Move to support the growth.
	<p>d. How can the plans better support</p>	<ul style="list-style-type: none"> • It is important to consider the impact to neighbourhood air quality from

	<p>goods movement by all modes of transportation?</p>	<p>the movement of goods as a significant proportion of air pollutants comes from diesel transport. Planning policies should ensure that sensitive populations are adequately separated from these sources of pollution.</p> <ul style="list-style-type: none"> • Recommendations should be included in the plans that incorporate urban design elements for freight supportive communities within new and emerging communities and key development areas to minimize conflicts with active transportation and general purpose travel lanes • Consideration should be given to requiring dedicated service / delivery parking within all developments in key development areas and urban growth centers • The Plans should further explore methods of optimizing the use existing infrastructure for goods movement throughout the provincial plan areas. • An assessment of goods movement patterns, requirements and overall framework for the GTHA would be beneficial. • Consideration should be given to the needs of the agricultural community in rural areas. In areas where active agricultural operations are located, roads need to be designed, built and maintained to accommodate farm equipment. Recognizing that farm equipment has grown in size, this necessitates roads, bridges, and roundabouts that facilitate the movement of these vehicles; not hinder their movement (e.g. narrow shoulders; signs too close to road; hard, vertical curbs; roundabouts too narrow/tight to allow wide and long farm vehicles to pass through).
	<p>e. How can the plans identify and better protect the strategic infrastructure corridors needed over the long term?</p>	<ul style="list-style-type: none"> • The Plans should clearly identify long term infrastructure corridors as well as document rationale and supporting data for the identification of such corridors. Clarification of what level of review / detail is required to sufficiently protect these corridors through policies in the Growth Plan or revisions to Municipal Class EA is required. • As growth will occur closer to boundaries of protected corridors, concerns around noise, vibration and safety will increase. The Plans should incorporate a high level assessment of risks associated with intensifying land uses near multi-use corridors and the incremental expansion of uses within existing corridors and provide mechanisms or guidelines to protect strategic infrastructure corridors from sensitive land uses and vice versa.
	<p>f. How can the plans better balance the need for critical</p>	<ul style="list-style-type: none"> • Prioritizing active transportation and public transit over single occupancy vehicle use and providing infrastructure for electric vehicles and other

	<p>infrastructure to support economic growth with environmental protection?</p>	<p>green technologies will support a reduction in environmental impacts.</p> <ul style="list-style-type: none"> • The Plans ensure that environmental protection is considered in all transportation decisions, and, wherever feasible, a context sensitive approach is used in all infrastructure projects. However, protecting natural heritage features and crossing of manmade barriers should not be a barrier to developing connected and complete communities. Providing safe, convenient and accessible connections between neighbourhoods and the arterial road network is important to support transit-oriented communities and active transportation. Enabling or supportive language should be included in the Growth Plan, ORMCP and Greenbelt Plan to assist in balancing the need for complete and connected communities with protecting natural heritage linkages. Although staff support policy 2.2.7.3 of the Growth Plan, which prohibits development within environmental features, the policy should be reviewed to clarify that infrastructure shall be permitted across these features to ensure that communities are connected and allow sustainable transportation, including walking, cycling and transit connections between neighbourhoods and to collector and arterial road networks. • The Plans have helped maintain existing conditions of forestry, surface water quality and groundwater quality. However, without increased tools and mechanisms to restore and enhance natural systems, environmental conditions may decline due to the cumulative impacts of growth, critical infrastructure and climate change. • In order to support the Region’s efforts to achieve forest cover of 25% of York Region’s land area, it would be beneficial for the Province to identify mechanisms to support the achievement of a net gain of forest cover in Provincial Plan areas. The Province is encouraged to develop a no-net-loss approach to managing forest cover. Additionally, recognizing the importance of significant woodlands and urban forest canopy cover within the Growth Plan area is integral to supporting the delivery of complete communities. • Intensified growth in the GGH region requires long term planning, and large ‘superstructure’ capital investments, that are largely borne by upper- and single-tier municipalities. Since 2006, planning for these investments has been guided by the vision articulated in the Growth Plan. Growth targets must be realistic and achievable to effectively guide infrastructure investments to support growth.
<p>Additional</p>	<p>How can the plans help tackle</p>	<ul style="list-style-type: none"> • The Province should do more to encourage public and private

<p>Considerations from Section 4.2</p>	<p>congestion?</p>	<p>Transportation Demand Management (TDM) plans and encourage employers to consider formal telework and carpooling policies and work with organizations to implement TDM practices (e.g. Smart Commute) throughout the GGH</p> <ul style="list-style-type: none"> • Continue to require developing complete communities with mix of housing types, amenities, employment, institutional uses and recreation opportunities will eventually lead to a reduction in the need to use cars to accomplish daily tasks. • Transportation systems need to be well-connected, efficient and provide reliable transportation. Substantially higher investments in public transit infrastructure need to be improved over the short and long term to shift the reliance from vehicles to sustainable transportation measures. • The Plans need to consider and support innovations and advancements in technology, from smart cars, Regional Express Rail, to intelligent transportation systems that can alleviate and manage the congestion of our corridors. • Further support for intra- and inter-regional rapid transit systems supported by compatible land uses and communities that are compact and transit-oriented.
	<p>Can the plans do more to align with transit and transportation investments, and to ensure that communities provide safe and convenient access to transit?</p>	<ul style="list-style-type: none"> • Require that sustainable modes of transportation (e.g. public transit, carpooling, cycling and walking) are accessible and available with supportive infrastructure (e.g. bus bike racks and shelters). • Require that densities are transit supportive and align with MTO's Transit Supportive Guidelines. • Require that communities are designed to be interconnected, high density, mixed use and walkable with a variety of affordable housing options. • Further consideration is needed in developing supportive fiscal tools to assist municipalities in constructing the multi-modal transportation networks needed to support the Growth Plan. Through the establishment of Metrolinx and adoption of The Big Move, the Province has made unprecedented investments in rapid transit across the Greater Toronto Area. • The Development Charges Act (1997), with the exception of the legislation change specific to the extension of the Spadina Subway to Highway 7, limits investments in infrastructure consistent with the historical 10-year levels of service. For example, Transit Facilities within the 2012 Regional Development Charges Background Study have a

		<p>gross estimate cost of \$134 M, of which \$42 M is eligible for funding under Development Charges as a result of historical level of service expenditures. These costs consist of transit vehicle garages, loops, stops, operations and maintenance facilities and a new Transit Terminal. In addition, the York Region Transportation Master Plan and Development Charges Background Study identified an additional \$4.5 B in transit infrastructure for the construction of Light Rail Transit corridors, of which 100% is ineligible for funding under Development Charges as a result of historical level of service expenditures. This makes it difficult to allow for unprecedented improvements in transit such as a shift from service improvements in conventional transit to the construction of dedicated bus rapid transit or light rail transit networks. It is neither practical nor sustainable to consider tax levy expenditures to implement these investments, investments which are generally needed to support new growth and development within the communities. We Acknowledge Bill 73 has made steps towards achieving these goals in allowances for planned levels of service (Section 5.2 subsection 60 (1)), however, it should be recognized that Transit and transit related infrastructure are required to be included in the subsequent regulations</p> <ul style="list-style-type: none"> • Progressive legislative reforms to Development Charges Act and the Municipal Act are required to ensure that significant investment in transit can be sustained over time. Similarly, revisions to the Municipal Act and Development Charges Act are required to assist neighbouring communities at both the local and Regional levels to assist in funding transportation improvements that have mutual benefits with bordering jurisdictions. This is specifically important when considering investments in transportation improvements along or in proximity to municipal boundaries despite the legislated approval authority of a roadway where shared benefits across jurisdictions to infrastructure improvements may exist. These comments have also been reiterated in the Region's response to Bill 73.
	<p>How can the province better provide direction on municipally managed roads to support efficient goods movement?</p>	<ul style="list-style-type: none"> • Establishing best practices for Centre to Centre communication, sharing of data and coordinated traffic management response • The Plans needs to address the interface between the Province's highways and regional/local streets to determine how goods movement can be supported through a more urban setting • Key Intermodal hubs in the GTA are identified in the Growth Plan. Stronger language around protecting linkages between these nodes and

		<p>the Provincial freeway network would assist in refining provincially significant goods movement corridors which would be further recognized in local and Regional Official Plans</p>
	<p>The Provincial Policy Statement already requires that municipalities take into account the financial viability of their infrastructure assets over its life cycle. This can be done through asset management plans that consider factors such as the initial cost of construction, the cost of operation and maintenance, and the cost of replacing infrastructure. Should the plans do more to support this goal?</p>	<ul style="list-style-type: none"> • Asset Management Plans are critical to managing the expense of implementing and owning municipal infrastructure and should be a key requirement of the Plans. The Plans should consider the operational, maintenance and replacement costs for existing and protected infrastructure to allow opportunities to successfully provide financial plans to keep infrastructure in a good state of repair and to be able to replace them when required. • Clarification or guidance is required as to what is considered the minimum level of review when undertaking benefit cost analysis of infrastructure improvements. For example, as a minimum, financial viability shall be undertaken at a Regional level through coordinated studies such as Municipal or Regional Master Plans. This would not preclude a more detailed assessment at a project or block level however assist in completing assessment at a broader Regional level with sufficient detail and in a timely manner. • Life cycle assessments need to incorporate climate change considerations. While the PPS requires asset management plans including the cost of replacing infrastructure, in order to fully account for infrastructure costs the plans must also consider the health costs associated with damage to infrastructure such as floods and power outages e.g. infectious diseases, injuries, etc.
	<p>To support cost-effective infrastructure decisions, large municipalities in the region typically develop water, wastewater and stormwater infrastructure and transportation master plans at the same time as they plan for growth. Can the four plans do more to encourage best practices in infrastructure and growth planning across the region?</p>	<ul style="list-style-type: none"> • The incorporation of green infrastructure best practices should be encouraged in all four plans. • The Plans should consider supporting the development of regional/local Congestion Management Plans that supports the implementation of related traffic management infrastructure • The plans consider sensitivity analysis for a range of density targets and growth projections which are further incorporated with municipal comprehensive review timing and local secondary plans and coordination during development of Master Plans at the Regional level (MH) • The Province should provide additional guidance to municipalities on best practices for recognizing and accommodating agricultural operations and the needs of the agriculture industry in Ontario in these

	<p>How can the province’s role in protecting corridors for roads, transit lines, electricity transmission lines and generating facilities be strengthened?</p>	<p>master plans</p> <ul style="list-style-type: none"> • An assessment of existing acts and legislation to determine if there are areas that need improvement for consistency of standards. For example, the Electrical Safety Authority oversees and protects for electrical infrastructure in the road right of way in accordance with the Ontario Electrical Code, but does not oversee electrical infrastructure associated with Hydro Authority plant or Transit Authority electrical infrastructure related to rail. There needs to be greater coordination in protecting for these corridors. • Revisions to the Provincial Plans are required to be consistent with Section 1.1.2 of the PPS and identify corridors beyond the 20 year horizon. Failure to recognize corridors beyond 20 year horizon may indirectly infer that these corridors are not required to support achieving the Growth Plan targets. <ul style="list-style-type: none"> ○ This would include corridors that are EA approved, such as the extension of Highway 404 and Bradford Bypass; and proposed corridors such as the planned extension of Highway 427 to Highway 9 and northerly to Barrie. • Ensuring that a long-term vision is recognized at all levels of government will assist in the phasing and distribution of growth across all existing urban areas. However, caution needs to be exercised in identifying Planned Infrastructure within the Growth Plan, and should not be considered the complete summary of the infrastructure requirements to support the Growth Plan. Referencing more detailed studies within the Plan, allows for progressive enhancements of growth plan as secondary documents are adopted or approved. For example, updates to local Master Plans; MTO Area Transportation Needs Studies. As a minimum, any technical recommendations on infrastructure requirements, including but not limited to phasing and limits presented in the Growth Plan should be supported with technical analysis.
<p>4.3 FOSTERING HEALTHY, LIVEABLE AND INCLUSIVE COMMUNITIES Healthy, livable,</p>	<p>3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?</p>	<ul style="list-style-type: none"> • Incorporating greater consideration of the health impacts of land use and transportation planning would support the design of livable and healthy communities. Suggest highlighting the value of the Plans to human health and expanding on how these plans can help contribute to healthy and sustainable communities. <ul style="list-style-type: none"> ○ Sustainable modes of transportation (e.g. public transit, carpooling, cycling and walking) are accessible and available

<p>inclusive and complete communities can improve our quality of life, attract people and jobs to the region, reduce healthcare costs and be accessible to all Ontarians at all stages of life.</p>		<ul style="list-style-type: none"> ○ with supportive infrastructure (e.g. bus bike racks and shelters). ○ Communities are designed to be interconnected, high density, mixed use and walkable with a variety of affordable housing options. ○ Buildings are designed to be energy and water efficient, climate resilient and pedestrian and cycling oriented. • There is a growing body of evidence linking human health and well-being with natural environment. Research studies have shown associations between exposure to green spaces and stress reduction, improved mental health, improved immune response, greater birth weights, and greater physical activity. Green spaces can also provide other benefits for creating healthy environments through pollutant removal, reduction of surface temperatures, and providing shade in extreme heat days. • Support research to collect the evidence and best practices on what parameters constitute a healthy community from a land use planning perspective. For example: what is the best evidence on separation distances for protecting neighbourhoods from traffic-related air pollution; what climate-resilient measures best protect communities from extreme heat and other extreme weather events? • In addition to affordable housing, the Province should ensure accessible housing (e.g., age-friendly accessible housing, so people can stay in their homes as they get older). • Communities need to be designed to support all modes of transportation including active transportation, transit, and automobiles. Convenient and accessible access to transit extends the accessibility of conventional and rapid transit to Ontarians with limited mobility and helps to ensure that all areas of a community become accessible.
	<p>a. How can the plans provide more direction on designing:</p>	
	<p>i. Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets?</p>	<ul style="list-style-type: none"> • The Plans should provide additional guidance on designing communities with sustainable travel modes in mind before planning for cars. When we lead with greater consideration of the needs of a pedestrian or cyclist in mind, communities will be designed to have the amenities and spaces to support that mode. • A safe and interconnected network that supports walking and cycling is best achieved through public streets, rights-of-way, and walkways that provide public access. Better connectivity is an inherent principle of good planning and should be a requirement that is applicable to all

		<p>development throughout the GGH. There should be a policy in the Growth Plan that speaks to the requirement of “connectivity” in development (in general) and in the development or redevelopment of large sites.</p> <ul style="list-style-type: none"> • Most of what is required to foster healthy, liveable and inclusive communities is already set out in the Provincial Plans and further articulated through municipal Official Plans. However, many good local policies are often prevented from being implemented in the manner the community wishes due to the current complex, costly and lengthy adjudicative process at the OMB. Bill 73 includes a number of “non-appealable” matters under the proposed Section 17(24.5). The Province should consider adding to this list to streamline the approval of any Official Plan conformity amendments related to the 2015 Provincial Review. • Urban Design Guidelines, Infill Plans, Block Plans, etc. that have been approved by a municipal Council currently lack the “legal” weight given to statutory documents like Official Plans. However, in many cases these documents are used as tools to implement Official Plan policies and provincial objectives. Master Plans/Guidelines are prepared with consultation from the public and provide detail on how to achieve better design within communities. The Province should consider requiring the preparation of Council approved Master Plans/Guidelines that implement local and provincial policies and objectives and give weight to these documents through the Planning process.
	<p>ii. A safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations?</p>	<ul style="list-style-type: none"> • For communities to support health, density needs to coexist with land use mix, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work and school, can be conveniently reached by walking, cycling or public transit, the car will remain the default mode of travel. • The Plans need to identify how to convert thoroughfares as destinations and places where people will feel comfortable traveling and walking, especially in areas of key destinations. There needs to be coordination among all levels of government and included in the various campaigns to further support active transportation (i.e. including references to the #CycleON program in the Plans may strengthen its objectives) • Consistent with Policy 1.1.1 of the PPS which speaks to additional elements of healthy communities, such as community design and planning for all ages, policies should include and emphasize the

		<p>importance of health factors being considered in community design.</p> <ul style="list-style-type: none"> ○ A report of the Medical Officers of health in the GTHA released in 2014 outlines how health objectives can be incorporated into land use planning in Ontario. The Province should consult with and consider the input provided through the document, ‘Improving Health by Design in the GTHA’ • Policies should support the use of a context sensitive approach to roadway design and providing active transportation facilities along Regional and local corridors. • Providing connections to transit stations will continue to be important as the Province delivers Regional Express Rail. The arrival of frequent, all-day, two-way rail service has the potential to significantly change travel behaviours throughout the GGH and the Plans provide for greater connections to stations and support alternative modes of transportation and multi-modal integration. • Generally, plans are being developed to support the objectives of complete communities with walking and cycling linkages, however in most cases, these communities are developed in isolation as development blocks within the same neighbourhoods and are often divided by natural heritage and man-made features. A shift in recognition on priorities is needed. For example, should we construct cul-de-sacs, which prohibit connectivity between communities to ensure that environmental corridors are protected, or should we approach all development areas under the lens of complete communities, ensuring connectivity between • neighbourhoods and consider context sensitive solutions in bridging all environmental corridors and man-made barriers as the first priority? • Roads widened to facilitate bike lanes also enable the safe movement of large farm equipment on rural roads.
	<p>b. How can the plans better support the development of a mix of housing that meets the needs of the region’s growing population, including affordable housing?</p>	<ul style="list-style-type: none"> • The Plans need to support mixed use, complete communities with a range of housing options supported by integrated public transit. Currently, housing affordability and high real estate costs are pushing people to live further than their ideal location. Long distances between homes, businesses and amenities result in longer commuting time and can influence health. More time spent in personal vehicles contributes to air pollution and greenhouse gas emissions, with less personal time for social and recreational activities, including physical activity. • Consider permitting inclusionary zoning for affordable and/or rental

		<p>housing combined with policies for incentives to encourage this form of development.</p> <ul style="list-style-type: none"> • Ensure policies within the provincial plans encourage: <ul style="list-style-type: none"> ○ A full mix of housing types and tenures for all residents in optimal locations, including affordable housing options ○ Increased development of purpose-built market rental housing ○ Access to under-utilized lands for development of affordable housing or purpose-built market rental housing • Creating more affordable housing options, including rental is important for the following reasons: <ul style="list-style-type: none"> ○ Businesses will be more competitive in attracting and retaining employees ○ Seniors will have more options to downsize ○ Young adults can stay in their community when moving out of their parent’s home ○ Newcomers and young professionals can find housing close to work • As communities intensify, there is a need for policy direction or incentives for the development of more “family-oriented” high-rise housing units. Single-family detached dwellings traditionally filled this demand, however with the growing cost of land in the GGH alternative options should be created and protected for. High density condominium apartments are becoming increasingly smaller in unit size, making it difficult for families to consider living in this form of housing, even if they want to. The Growth Plan should provide policy direction to ensure that higher-density developments include facilities and unit sizes designed to meet the needs of families. Additionally, the Growth Plan could require that a certain percentage or portion of high density development be oriented to families or empower local municipalities to mandate an appropriate proportion in their OPs or Secondary Plans based on the growth projection and demographics for that municipality.
	<p>c. How can the plans better protect heritage buildings, cultural heritage landscapes and archaeological resources?</p>	<ul style="list-style-type: none"> • The plan could reference the Ontario Heritage Act and the need to integrate heritage buildings and landscapes into new development to create a unique sense of place. • The Province should carry out an assessment and inventory of the existing heritage buildings and cultural and archaeological resources and include Policies which protect these resources • Raise awareness about what heritage, cultural heritage landscapes and

		<p>archeological resources we have, and why they should be protected and how they can potentially support a shift to an alternative mode of travel (i.e. the development of main streets)</p> <ul style="list-style-type: none"> • For rural/agricultural buildings; uses that permit the farmer to derive income from them will facilitate their preservation • The Province is encouraged to ensure that any policies aiming to protect heritage buildings and cultural landscapes do not impede current agricultural operations from thriving • New farm buildings should be exempt from any cultural heritage implications • The Plans already do a good job at protecting heritage and cultural heritage landscapes. There is, however, room to expand protection policies to strengthen enforcement
<p>Additional Considerations from Section 4.3</p>	<p>What is the best way to support a bicycle network?</p>	<ul style="list-style-type: none"> • Ensure planning for a bicycle network is coordinated across the Province. Implementation of #CycleON Ontario’s Cycling Strategy in collaboration with Regional and local municipalities, Conservation Authorities and other levels of government will ensure existing and planned infrastructure to support bicycle networks is efficient and well connected. • The Province should consider the development of a provincial program similar to York Region’s Municipal Partnership Program to encourage greater investments in cycling infrastructure amongst municipalities. While the new Ontario Municipal Cycling Infrastructure Program is an excellent first step, additional funding beyond the initial \$10 million will be required to ensure adequate cycling infrastructure can be provided at the local level to support an integrated bicycle network. The Province is encouraged to provided dedicated annual funding to support to this program. • A variety of cycling facilities and traffic calming measures is needed to encourage cyclists of all ages and abilities. Facilities should be context sensitive and work to create a comprehensive cycling network that meets both recreational and utilitarian needs. • In order to increase cycling mode share and reduce injuries, dedicated and separated facilities are encouraged where possible. Studies show that separated facilities are more likely to appeal to younger cyclists and new cyclists, whereas confident, regular cyclists may feel more comfortable closer to automobile traffic. • Consider strategies to reduce cyclists’ exposure to high levels of air

		<p>pollution wherever possible. Mitigation strategies could include streetscaping or barrier to separate motor vehicles from cyclists, or planning routes to reduce air pollutant exposure.</p> <ul style="list-style-type: none"> • Consider incorporating concepts from the Centre for Sustainable Transportation's Child and Youth Friendly Land Use and Transport Planning Guidelines (Ontario) • Encourage municipalities to develop Pedestrian and Cycling Master Plans and Trails Master Plans, and, consistent with Municipal Class EA process for Master Plans, require updates to these plans no longer than 5 years. Similar to the Big Move, where transit was connected intra-regionally, these master plans should be coordinated to provide intra-regional connections of cycling networks, for example the Lake-To-Lake Route. • 5 E's of bicycle-friendly communities should be incorporated into the Provincial Plans where possible, Engineering, Education, Encouragement, Enforcement, and Evaluation
	<p>What is a good mix of parks and open space in a community?</p>	<ul style="list-style-type: none"> • The Province could provide greater direction by commissioning research and reports into the health and environmental benefits of parks and greenspace, for example: incorporating emerging evidence on the value of parks and greenspace to local air quality and heat mitigation. As a member of EcoHealth Ontario, several public health agencies contributed to a recently released report that analyzed 102 peer-reviewed studies published over the past five years that explored the role of urban green space in providing cooling effects and reducing air pollution. It found that urban green spaces provide significant health benefits by filtering harmful pollutants from the air and providing cooling effects during extreme heat. http://www.davidsuzuki.org/publications/reports/2015/the-impact-of-green-space-on-heat-and-air-pollution-in-urban-communities/ • Just as everyone should be within 500m of a transit stop/station to ensure accessibility to transit, everyone should have similar access to a park or open space
	<p>How could the plans address new and emerging issues, such as the growing interest in access to local and healthy food and urban agriculture?</p>	<ul style="list-style-type: none"> • The plans should focus on increasing local food production year-round to improve resilience and food security. Supporting local food production and procurement decreases emissions associated with long distance transportation of food. Access to a dependable and affordable supply of nutritious food also contributes to people reaching their full physical and

		<p>mental potential, and lowering their risk for chronic diseases. It is important to protect the Greenbelt and other agricultural lands that are close to the urban markets.</p> <ul style="list-style-type: none"> Support further research on the environmental and economic value of a local food system - 2015 report – <i>Dollars and Sense: Opportunities to Strengthen Southern Ontario’s Food System</i>.
	<p>How can the plans support the commitments to improved cycling infrastructure, as contained in #CycleON: Ontario’s Cycling Strategy 2013?</p>	<ul style="list-style-type: none"> The Plans should recognize the Province’s role in partnering with municipalities to fund cycling infrastructure and continue to support the Ontario Municipal Cycling Infrastructure Program with ongoing, dedicated funding. Create a Province-wide cycling network which provides an intra-regional transit network for people to access other parts of the GTHA without a car
<p>4.4 BUILDING COMMUNITIES THAT ATTRACT WORKERS AND CREATE JOBS</p> <p>Communities need to be planned in ways that attract skilled workers and their employers, and that ensure land is readily available for a range of employment uses. This is fundamental to maintaining our economic competitiveness.</p>	<p>4. How can the plans better support the development of communities that attract workers and the businesses that employ them?</p>	<ul style="list-style-type: none"> Involve the Ministry of Environment and Climate Change to ensure that industrial development balances the economic and business needs of our communities with ensuring that incompatible uses do not negatively impact sensitive populations in terms of air quality, noise and other environmental issues. Ensure housing policies encourage a full range of housing options, including affordable ownership and purpose-built rental housing. As well, housing options close to employment opportunities reduces travel distances, which helps companies, attract and retain a strong workforce, particularly young, talented and mobile workers. Consideration needs to be made for the diverse and changing demographics – i.e. aging population, immigrant population, single income homes, etc. – in the design of communities. Policies need to support live:work options by ensuring that employers are located close to transit facilities, where people are living and where there are options and variety in housing types
	<p>a. How can the plans better support the development of vibrant office and mixed-use employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near</p>	<ul style="list-style-type: none"> For communities to be complete and support health, density needs to coexist with land use mix, employment areas, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work and school, can be conveniently reached by walking, cycling or public transit, the car will remain the default mode of travel. The Province should provide financial incentives to businesses that

	<p>critical transportation infrastructure?</p>	<p>locate close to existing and planned major transit. These should be reflected in policies within these Plans.</p> <ul style="list-style-type: none"> • Consistent with PPS Policies 1.3.2.3 and 1.6.8 employment areas in close proximity to key corridors and facilities for goods movement are protected, similarly, key sites near major transit stations should also be protected for future employment areas. • Consistent with PPS Policy 1.3.2.4, policies should support long-term planning for employment areas • Consistent with PPS Policy 1.2.6, the policies within the plans Plans should ensure that major industries and facilities are protected from new and incompatible uses that can impact their ability to continue or expand (SM) • Existing policies within the Growth Plan regarding employment land conversions do not provide municipalities with adequate authority or tools to protect strategic lands important to delivering objectives and densities of the Growth Plan from conversion to residential and other uses. Specifically, policy 2.2.6.5 of the Growth Plan should be reviewed and amended to include the words "... through an upper- or single-tier <i>municipal comprehensive review</i>...". Further enabling upper- and single-tier municipalities to prevent conversions of strategically located employment lands will ensure that the GGH remains globally competitive in attracting jobs and supporting economic growth. The Growth Plan should also be amended to include criteria regarding what is considered to be 'strategic' employment land. The current definitions of 'employment area' and 'strategic settlement employment area' are inadequate in terms of defining what makes these lands valuable strategically. • The Province should provide guidance to direct Regional municipalities to identify "strategic" employment lands by region (i.e. existing employment lands and additional employment lands needed beyond the 20 year horizon per PPS Policy 1.3.2.4). The Province may also want to play a role in coordinating a larger economic development strategy for employment lands across the GGH. • It is recommended that the Province develop a process to confirm or correct boundaries associated with the Greenbelt Plan and Oak Ridges Moraine Conservation Plan.
	<p>b. What is the role of retail in building vibrant communities and how can the plans support or</p>	<ul style="list-style-type: none"> • The Growth Plan encourages the creation of destinations for people to live, work and play. The provision of retail development supports the vibrancy, viability and strength of our communities by supporting

	<p>direct retail development?</p>	<p>economic growth and providing a mixed-use environment.</p> <ul style="list-style-type: none"> • Policies that require retail to be designed to be pedestrian friendly and accessible should be incorporated in the Plans. • Future major transit station sites are excellent opportunities for mixed-use developments. As future rapid transit is developed, consideration should be given to policies that support and encourage station-related or ground level retail into the sites that will attract more transit riders as well as ensure the viability of the community. • Consideration should be given to reduced parking standards to promote alternatives modes of transportation and meet density targets
	<p>c. How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?</p>	<ul style="list-style-type: none"> • An increasing body of evidence is demonstrating the value of local agriculture and natural resources to Ontario’s economic, environmental and social health. It is important to collect and share this evidence in order to inform decisions on agricultural policy, aggregate extraction and protection of natural environments. • Both agriculture and aggregate extraction are vital to the Provincial economy and a balance is needed to ensure both uses do not interfere with the other.
	<p>d. How can the plans’ policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities?</p>	<ul style="list-style-type: none"> • Agriculture depends upon connections with the natural heritage system, transportation networks, businesses that serve the agriculture sector and that process, preserve and distribute agricultural products, as well as other land uses and economic activities. It is important for the Plans to acknowledge and sustain these connections in order to support the viability of agricultural activities and not simply preserve land that is viable for agriculture. Supporting a successful agricultural industry and maintaining working farms within the Greenbelt is key to its long-term protection and stewardship. • Revised policies contained in the Provincial Policy Statement (PPS) 2014 permit a greater range of uses in Prime Agricultural Lands, supporting flexibility and resilience in the agriculture industry and the rural economy. Specifically, the updated PPS 2014 introduced several new defined terms which recognize how farming is evolving. Examples include “on-farm diversified uses” and “agri-tourism uses”. • Definitions such as “agricultural uses” and “agriculture-related uses” were also modified for the same purpose. Through these definitions and policy modifications, the PPS now recognizes additional uses within prime agricultural areas which will enhance overall viability of the

		<p>agricultural industry. With the support of the agricultural community, who strongly support these modifications, it is recommended that the province make corresponding changes to the Provincial Plans.</p>
<p>4.5 ADDRESSING CLIMATE CHANGE AND BUILDING RESILIENT COMMUNITIES</p> <p>Climate change is one of the most significant challenges facing the region. Taking action to address climate change, and build resilient landscapes and communities can improve our health and quality of life, as well as reduce the damage and related costs resulting from extreme weather events.</p>	<p>5. How can the plans help address climate change?</p>	<ul style="list-style-type: none"> • The Plans should include policies that explicitly address climate change. Ontario has the opportunity to be a leader in the green economy and healthy built environments by planning complete communities and supporting sustainable buildings, infrastructure and transportation systems that reduce greenhouse gas emissions. The health co-benefits include better air quality, reduced urban heat island, increased community resiliency, protection from infectious diseases and lower health care costs. It is important to take steps to measure and report on these benefits in order to demonstrate the benefits of resilient communities. There is growing evidence that the natural environment provides many benefits to human health including: improving air quality, reducing greenhouse gas emissions, preserving water quality, providing opportunities for physical activity and recreation, and addressing social and mental health. • The Plans should protect and support forested areas and green spaces as they contribute to carbon sequestration and storage. They also combat climate change impacts by providing natural shade and addressing urban heat islands and help buffer against the damaging effects of flooding during storm surges. In order to support the Region’s greening efforts, it would be beneficial for the Province to identify mechanisms to support the achievement of a net gain of forest cover in Provincial Plan areas. The Province is encouraged to develop a no-net-loss approach to managing forest cover. Additionally, recognizing the importance of significant woodlands and urban forest canopy cover within the Growth Plan area is integral to supporting the delivery of complete communities. • The PPS (Policy 1.8), requires the consideration of potential impacts of climate change (e.g., flooding due to severe weather) in order to support the reduction of greenhouse gas emissions and adaptation to climate change. The Plans should speak to best practices, tools and mechanisms that should be incorporated into community design that will protect communities from extreme weather events • Policies that speak to the state of good repair should be strengthened as infrastructure that is maintained and is in good condition ensures that infrastructure can withstand storm related events. For example, the

		<p>“State-of-Good-Repair” of traffic control infrastructure mitigate the impacts of climate change due to extreme weather by ensuring above ground infrastructure can withstand extreme weather events</p> <ul style="list-style-type: none"> • The Plans should address the need for traffic control infrastructure that is ready to withstand extreme weather conditions, and should speak to the provision of local and regional power back up sources. These measures would minimize the disruption of the traffic control system thereby reducing this cause of congestion and delays on the regional road network. Uninterruptable Power Supplies (UPS) for traffic control signals can help maintain traffic signal operation during widespread power outages during extreme weather events. • There are a large number of Provincial plans that are heavily integrated with these plans (e.g. Great Lakes Protection Act, Lake Simcoe Protection Plan, Climate Change, etc.), it will be important for the Province to support each other. • York Region commends the Province for its commitment to mitigating climate change through reduced greenhouse gas emissions and increasing the resiliency of communities. The Region recently submitted staff comments to the Ministry of the Environment and Climate Change regarding the Climate Change Discussion Paper, released in early 2015 (EBR No. 012-3452). The Province is encouraged to review the Region’s submission when developing actions to address climate change. • While the current Plans do much to ensure the resiliency of communities within the Greater Golden Horseshoe, by protecting natural heritage and agricultural systems and promoting the delivery of complete communities, improvements to the Plans should be considered. The Province is encouraged to consider how infrastructure needed to support growth can withstand the impact of severe weather events. Providing guidance for how municipalities can manage increased demands and impacts on infrastructure such as stormwater management, wastewater and drinking water treatment and conveyance, in light of increasingly severe weather events, would enable municipalities to optimize the design and use of key infrastructure. • The Province might also consider providing information on metrics for how municipalities could analyze and quantify climate change impacts consistently and also help facilitate collaboration between municipalities on common initiatives (i.e. stormwater management at municipal boundaries). Further, providing climate data and assessment tools to municipalities to help in identifying risks and areas of opportunities
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		<p>related to climate volatility would enable municipalities to be proactive in planning for the impacts.</p>
	<p>a. How can the plans contribute to reductions in greenhouse gas emissions?</p>	<ul style="list-style-type: none"> • Support healthy built environments by planning complete communities and sustainable transportation systems that reduce reliance on fossil fuels that contribute to greenhouse gas emissions. Ensure communities are designed to be interconnected, high density, mixed use and walkable. Public transit needs to be made a first priority for transportation infrastructure planning and major transportation investments. • The Plans should protect and support forested areas and green spaces as they contribute to carbon sequestration and storage, provide shade from heat and help buffer against the damaging effects of flooding during storm surges. Using land use planning tools, complete communities can be developed which integrate green space and natural heritage features to reduce the impacts of development on our natural systems. • Involvement and coordination at both the Provincial and Federal levels is key to ensuring that industries take part in climate change initiatives and changes. Since lack of funding can be a constraint to inspire industries to implement climate change measures to reduce emissions, partnership and coordination with the federal government is key to achieving the emission reduction targets, especially in certain sectors, such as transportation and goods movement • Legislation should include climate change measures and be encouraged at all levels of government so that high emission sectors make the necessary changes to reduce emissions. Legislation should speak to funding mechanisms/tax incentives, public-private partnerships, awards programs, and enforcement • Public-Private Partnership models for funding, construction, monitoring should be encouraged • The Province should continue to support transit-oriented development in the Growth Plan and to protect the ORM Natural Core, Natural Linkage, and Countryside Areas.
	<p>b. How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?</p>	<ul style="list-style-type: none"> • Planning our communities to be more resilient and sustainable will help them prepare and adapt to climate change impacts (e.g. extreme weather events). We support updates to the building code and other planning policies to further encourage uptake of development standards and landscaping features (e.g. Low Impact Development) that reduce energy and water use while incorporating natural and built shade to

		<p>reduce exposure to extreme heat and UV rays. In addition, sewage and drinking water systems need to be protected from flooding, overflows, contamination and power failures.</p> <ul style="list-style-type: none"> • Consider providing standardized vulnerability assessment tools to municipalities and key sectors to determine risks and areas of opportunity. The Ministry of Health and Long Term Care has developed a Climate Change Health Vulnerability Assessment and Adaptation Guideline for health units across Ontario. The Ministry of Environment and Climate Change is developing climate and health models to support the health vulnerability assessment. Examples such as this showcase the value of cross-sectoral collaboration in the development of tools to assess climate change impacts, and in the implementation of action plans to build resiliency. • Planning for resilient communities by directing development away from flood-prone areas and considering infrastructure that can withstand extreme weather events are beneficial mitigation measures that can potentially reduce the need for emergency assistance during and/or following an event. • The Plans should consider the higher frequency of intense storms both during winter and non-winter periods in the design of communities and active transportation facilities • Policies and plans should consider issues such as snow storage in the development and design of urban corridors as well as active transportation facilities. • Continuing to provide protection for agricultural lands helps to manage the impacts of extreme weather conditions because agricultural lands are permeable and facilitate recharge. The Province should recognize that road side ditches in rural areas form part of the agricultural tile drainage system and are a critical piece of infrastructure that need to be maintained in good working order to prevent crop damage or loss.
	<p>c. Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?</p>	<ul style="list-style-type: none"> • Suggest the Plans directly reference to climate change and its impacts on the environment and human health. Climate change adaptation, mitigation and increased resiliency should be reflected in policies to show consideration of these issues within the Plans. • The plans specifically need to consider the contribution of nature and green infrastructure to climate change mitigation and adaptation through further research in order to better protect ecosystems and human health. • Continuing to provide protection for agricultural lands helps to manage

		the impacts of extreme conditions because agricultural lands are permeable and facilitates recharge.
Additional Considerations from Section 4.5	Currently, the plans include no policies that explicitly address climate change. The review provides an opportunity to consider the possible addition of such policies.	<ul style="list-style-type: none"> The Region would support the inclusion of Climate Change policies, as it is consistent with the PPS and would request that direction be provided to municipalities as to how to sustain and overcome extreme weather events, how to design communities so that they are resilient to extreme weather events and what mechanisms are available to recover from extreme weather events. These policies should align with the Province's Climate Change Action Plan policies that are currently being developed and incorporate feedback provided on the Climate Change Discussion Paper.
	Can the four plans build on Provincial Policy Statement requirements and help establish criteria for planning resilient landscapes, development patterns and infrastructure in the region?	<ul style="list-style-type: none"> Yes, the plans can build on the PPS to establish criteria that is context-sensitive to apply broadly across the Province. The policies should reinforce the PPS by including references to the PPS sections within plans.
4.6 IMPROVING IMPLEMENTATION AND BETTER ALIGNING THE PLANS Better implementation and alignment between the plans can improve the efficiency with which the plans' goals are realized, and provide greater certainty for our communities and developers.	6. How can the implementation of the plans be improved?	<ul style="list-style-type: none"> The Greenbelt Council has developed a process for tracking the success of the Greenbelt Plan implementation. This approach should be undertaken for all four plans. Include a variety of indicators to measure the implementation of the policies that reflect the intent, but also the outcomes, of the Plans. The Province recently released performance indicators for the Growth Plan and the Greenbelt Plan and should do the same for the ORMCP and NEP. Completing a local and regional conformity exercise of the various policies can create issues in terms of timing when considering the number and extent of appeals that municipalities receive on their official plan updates. More direction is needed from the Province to help mitigate the impacts to approval processes for official plans.
	a. Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?	<ul style="list-style-type: none"> The Big Move and the Climate Change Action Plan need to be aligned with these Plans. Include cross-references to other documents. For example, including linkages to the PPS, Greenbelt or Clean Air Act policies within the Growth Plan (and vice versa) would be beneficial for strengthening the alignment and consistency of the Plans and may also limit the number of appeals that are received (since alignment will be done across the

		<p>board)</p> <ul style="list-style-type: none"> • Provincial agencies (e.g. GO Transit / Metrolinx) should demonstrate leadership in compliance with policies. It is recommended that MMAH provide additional guidance to ORMCP and Greenbelt interpretation and enforcement. • Since the ORMCP and the Greenbelt Plan came into force in 2001 and 2005, respectively, additional Provincial legislation related to the protection of drinking water quality has been enacted. Specifically, the <i>Clean Water Act</i> (2006) and related assessment reports, have resulted in both updated and new mapping for Wellhead Protection Areas, Intake Protection Zones, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas. This updated science has formed the basis for the development of Source Protection Plans. The Province is encouraged to update Section 42 of the ORMCP and Section 3.2.3 of the Greenbelt Plan as necessary to identify and resolve mapping and policy conflicts and terminology inconsistencies. The Province should aim for consistency between the various pieces of legislation related to water quality in order to minimize complexity in interpreting and implementing overlapping Plans. • The ORMCP policies relating to approval and information requirements for small-residential uses can be rigorous, complex and costly for homeowners to navigate, and apply to situations where the proposed development (for example a detached garage, swimming pool) poses no real adverse impacts on adjacent KNHFs, and/or Vegetation Protection Zones. This is particularly relevant to small-scale residential uses proposed within the ORM Settlement Area, where in many cases, it may not be practical to apply a 120 metre Minimum Area of Influence which can span multiple urban residential lots. The policies of Section 23 and 26 of the ORMCP should: <ul style="list-style-type: none"> ○ Be modified to provide municipalities with the flexibility to reduce, scope or waive the application requirements for small-scale residential development proposals, subject to certain criteria that ensures the intent of the ORMCP is fulfilled. ○ The Province could provide further direction on this matter via Technical Guidelines. • The Municipal Class Environmental Assessment (MCEA) planning process is intended to be an opportunity to compare and contrast options and alternatives for addressing a problem in the context of the full definition of the environment (technical, social and natural environment).
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	<p>b. What policies of the plans do you think have been successful and should be retained?</p>	<p>The Plan should include stronger acknowledgement of the EA process.</p> <ul style="list-style-type: none"> • Policies relating to directing and managing growth (growth targets and intensification), protection of greenbelt and agricultural lands, supporting higher order transit (the Big Move) and supporting alternative modes of transportation / active transportation have all been successful and should be strengthened and retained • The policy thrust of the Growth Plan, ORMCP, and GBP have been successful and should be maintained. The intensification of the built-up area envisioned in the Growth Plan is only beginning to realize itself – similar to the PPS Review; the Province should maintain the course set out in these Provincial Plans and not shift directions in order to ensure that intensification continues to occur around the transit investments made/planned over the past 10 years.
	<p>c. Should the province develop any additional tools or guidance materials to help support implementation?</p>	<ul style="list-style-type: none"> • Tools should be developed that enable the Province and municipalities to quantify the costs and benefits associated with the Plans, taking into account all health, environmental and economic considerations. There are a number of tools that have been used for specific quantifications such as the economic valuation of ecosystem protection. These tools should be reviewed and assessed as to their merits and limitations, and then promoted where appropriate, as evidence-based, promising or best practice. • The Plans include reference to a number of supporting guidelines to be developed following their release. The Growth Plan stated that freight-supportive land-use guidelines to promote and better integrate multi-modal goods movement into transportation system planning would be developed. Draft freight supportive land use guidelines were released by the Ministry of Transportation in 2013, but to date no final guidelines have been published. • A reference to transit-supportive land use guidelines is also contained within the Growth Plan. The original transit-supportive guidelines were published in 1992. Following the Growth Plan coming into effect in 2006, the guidelines were not updated until 2012, several years after upper- and single-tier municipalities undergone conformity exercises to ensure their official plans to conform to the Growth Plan. It is important for the Province to supply municipalities with guidelines in a timely manner, to ensure guidelines inform any necessary updates to official plans, policies, or monitoring programs.

		<ul style="list-style-type: none"> • In addition to the guidelines that the Province originally indicated would follow the Growth Plan coming into effect, there are opportunities for the Government of Ontario to provide further technical guidance to continue to ensure appropriate and consistent implementation of the Plans. Guidelines should be provided by the Province which establish the appropriate methodology for developing a land budget to accommodate the Growth Plan forecast population and employment growth. • The Province is encouraged to develop additional guidelines to address the fiscal implications for not accommodating forecast growth through the development of complete communities. The PPS 2014 now requires municipalities to plan for infrastructure in a manner which is coordinated and integrated with land use planning so that it is financially viable over its lifecycle (PPS 2014 policy 1.1.3.8 b) and policy 1.6.3 a). Highlighting best practices in fiscally responsible delivery of infrastructure from other jurisdictions would assist municipalities in determining the most fiscally-responsible approach to planning to accommodate and service forecast population and employment growth. • Clear direction on land budget and employment forecast methodology is required across the GTHA. Municipalities have been using different approaches to meet the Growth Plan requirements. The various assumptions a land budget is built around are complex and should be consistent across the GGH. The province is encouraged to develop a land budget methodology to ensure consistency between all municipalities in the GGH. A Provincial land budget process used by all municipalities should help mitigate appeals of regional and local land budget exercises to the Ontario Municipal Board (OMB), and make defending against such appeals more straightforward and effective.
	<p>d. Are there other opportunities to better facilitate implementation?</p>	<p>The Province should be reconciling these Plans with all growth related legislation through this review. The Province is encouraged to:</p> <ul style="list-style-type: none"> • Implement consistent definitions, language and terminology, and technical requirements to minimize the complexity of implementation in the local context, particularly where multiple provincial plans/documents are applicable within the same geographic area. <ul style="list-style-type: none"> ○ Providing consistent definitions or interpretation guidelines for key undefined terms used throughout the Plans, such as “local” and “small-scale” would also promote consistent and defensible implementation of the Plans. The Province is encouraged to take advantage of opportunities to improve and strengthen the

		<p>Plans by incorporating new agricultural-supportive policies and definitions from the PPS 2014 into the Plans.</p> <ul style="list-style-type: none"> • Recognize the significant differences in the way in which each of the ORMCP and GBP is written, and make necessary adjustments to better harmonize the Plans. • Improve readability of the ORMCP in particular, which requires interpreters to make numerous jumps between sections. • Other legislation within the Province has been amended since adoption of these Plans. An example includes the PPS (updated April 2014). Through consultation, the Region has heard strong support for the direction of the PPS 2014. As such, the Plans could benefit from amendments consistent with a number of the modified policies and definitions from the PPS 2014. The Plans should also be updated to provide definitions that are consistent with other legislation, across all Ministries, which has been passed or amended since 2005, including but not limited to: the <i>Clean Water Act</i>, the <i>Lake Simcoe Protection Act</i> and Plan, the <i>Endangered Species Act</i> and the <i>Green Energy Act</i>. • The Growth Plan establishes aggressive targets with respect to accommodating population and employment forecasts. Substantial infrastructure and services are required to support this growth. The Province is encouraged to review all of the Plans and make sure they align with the objective of delivering complete communities in a fiscally responsible manner. • A Provincially-led process to review Greenbelt Plan area and designation boundaries is needed: <ul style="list-style-type: none"> ○ It is recommended that the Province develop a process or set of criteria to confirm or correct Plan area boundaries, including the outer boundary of the Greenbelt Plan, and designation boundaries within the Plan areas. ○ Some submissions received relate to discrepancies between draft mapping made available to the public during the development of the Greenbelt and Oak Ridges Moraine Conservation Plans and mapping published by the Ministry in the final versions of the Plans. • Stronger partnerships between all levels of government is essential to successful mitigation of intensification challenges required to meet our future growth demands.
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	<p>e. Do the plans appropriately distinguish the differences between urban and rural communities?</p>	<ul style="list-style-type: none">• The Plans appropriately distinguish the difference between urban and rural communities.
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**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

Identifier	Landowner	Location of Lands	Municipality	Submission Overview	Category (see descriptions following the table)
1	Ballantry Homes	13530 10 th Concession	King	Request for boundary adjustment and review of natural heritage features on subject property and redesignation from Protected Countryside to Settlement Area (Nobleton) under the Greenbelt Plan.	Process for Boundary Confirmation/Adjustment
2	Eden Mills Inc.	18474 Yonge Street	East Gwillimbury	Request for boundary adjustment and review of natural heritage features on subject property and redesignation from Protected Countryside to Settlement Area under the Greenbelt Plan	Process for Boundary Confirmation/Adjustment
3	Batra	Part of Lots 1, 2, 3 and 5 Concession 3	Richmond Hill	Request to remove the lands from the Oak Ridges Moraine Conservation Plan area to be redesignated to allow for Strategic Employment uses	Process for Employment Lands
4	Times Group	11280 Leslie St Part of the East Half of Lot 29, Concession 2 (AHL North Leslie Lands)	Richmond Hill	Request to reconfigure boundary of Greenbelt Plan area to permit additional development.	Process for Boundary Confirmation/Adjustment
5	West Hill Redevelopment Company Ltd.	NW corner Ninth Line and 19 th Avenue	Markham	Request to have lands removed from Countryside designation in Oak Ridges Moraine Conservation Plan and redesignated Settlement Area to permit addition of the property to the Stouffville urban settlement area	Input Received
6	Toromont Industries Ltd.	SE corner King Road and Highway 400	King	Request to have lands redesignated from Protected Countryside under the Greenbelt Plan to Settlement Area (King City) to allow for Strategic Employment uses	Process for Employment Lands
7	Foch	22869 Woodbine	Georgina	Request to have lands removed from the Protected Countryside designation	Process for Employment Lands

**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

		Avenue		in the Greenbelt Plan to allow for the development of a 'gateway feature'	
8	Minotar Holdings Inc.	*See submission	Markham	Request for boundary adjustment and review of natural heritage features on subject property's Protected Countryside designation under the Greenbelt Plan	Process for Boundary Confirmation/Adjustment
9	James	2 Wylie Lane	Whitchurch-Stouffville	Request to reconfigure boundary of Oak Ridges Moraine Conservation Plan to permit severances	Process for Boundary Confirmation/Adjustment
10	P. Campagna Investments Ltd.	15172 Woodbine Ave 11670 Woodbine Ave	Whitchurch-Stouffville	Request to have lands removed from Countryside designation in Oak Ridges Moraine Conservation Plan and redesignated to allow for Strategic Employment uses	Process for Employment Lands
	P. Campagna Investments Ltd	11767 Woodbine Ave 11851 Woodbine Ave 11674 Warden Ave	Whitchurch-Stouffville	Request to have lands removed from Countryside designation in Oak Ridges Moraine Conservation Plan and redesignated to allow for Strategic Employment uses	Process for Boundary Confirmation/Adjustment
11	Toms	11882 Highway 48	Whitchurch-Stouffville	Request to have lands removed from Oak Ridges Moraine Conservation Plan	Process for Boundary Confirmation/Adjustment
12	Farzam	13136 Tenth Line	Whitchurch-Stouffville	Request to have lands removed from Countryside designation in Oak Ridges Moraine Conservation Plan and redesignated Settlement Area to permit development of the subject property	Process for Boundary Confirmation/Adjustment
13	Pacifico	12820 Bathurst Street	King	Request to have lands removed from the Linkage designation under the Oak Ridges Moraine Conservation Plan to permit the development of the subject property.	Process for Boundary Confirmation/Adjustment
		East side of	Vaughan	Request for additional permissions for	Process for Boundary

**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

		Kipling Avenue, north of Kirby Road		property designated Protected Countryside under the Greenbelt Plan.	Confirmation/Adjustment
14	Savoia Developments	Concession 7, Part LOTS 17, 18, 19 at Hwy 48 and Pine Vista Avenue	Whitchurch-Stouffville	Request to have lands removed from Oak Ridges Moraine Conservation Plan and be redesignated Settlement Area (Ballantrae) to permit additional development of the subject property.	Process for Boundary Confirmation/Adjustment
	Savoia Developments	12724 Tenth Line 12822 Tenth Line	Whitchurch-Stouffville	Request to reconfigure settlement area boundary and to have lands north of the subject property removed from the Oak Rides Moraine Countryside designation and into the Settlement Area designation to permit additional development of the subject property.	Process for Boundary Confirmation/Adjustment
15	Milani Group	NE corner Dufferin Street & Teston Road	Vaughan	Request to reconfigure settlement area boundary and to have lands designated Countryside removed from the Oak Rides Moraine Conservation Plan area.	Process for Boundary Confirmation/Adjustment
16	1612285 Ontario Inc	Part of Lots 6, 7, 8, 9, 10, Concession 5 (NW corner King Road and Hwy 400)	King	Request to have lands removed from the Protected Countryside designation under the Greenbelt Plan to allow for Strategic Employment uses	Process for Employment Lands
17	1606620 Ontario Inc	12700 7 th Concession Road	King	Request to maintain 'whitebelt' designation in the Greenbelt Plan and for lands outside of identified natural heritage features to be brought into the Vaughan settlement area for future development	Process for Boundary Confirmation/Adjustment
	1606620 Ontario Inc	0 Pine Valley Drive	Vaughan		
18	Buck	5511 King Vaughan Road	Vaughan	Request to maintain 'whitebelt' designation in the Greenbelt Plan and for lands outside of identified natural heritage features to be brought into the	Process for Boundary Confirmation/Adjustment

**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

				Vaughan settlement area for future development	
19	1098470 Ontario Inc	11776 Highway 48	Whitchurch-Stouffville	Request to have lands removed from the Oak Ridges Moraine Conservation Plan area and be redesignated from Countryside to permit development of the subject property.	Process for Boundary Confirmation/Adjustment
20	Losar Developments Ltd	672 and 684 Henderson Drive	Aurora	Request for additional permissions for properties located within the Settlement Area of the ORMCP and Greenbelt Plan	Input Received
21	Westlin Farms	12470 Weston Road	King	Request to maintain Settlement Area designation under the Greenbelt Plan and to prevent the expansion of the Greenbelt onto these lands.	Process for Boundary Confirmation/Adjustment
22	Whisper Walk Estates Inc.	12485-12555 Weston Road	King	Request to have lands removed from the Protected Countryside designation under the Greenbelt Plan area and be redesignated to Settlement Area to allow for future development of the subject property.	Process for Boundary Confirmation/Adjustment
23	Goldpark (Maple) Inc.	12022 Keele St	Vaughan	Request to have lands removed from the Linkage designation under the Oak Ridges Moraine Conservation Plan area and be redesignated to Settlement Area to allow for future development of the subject property.	Process for Boundary Confirmation/Adjustment
	Goldpark (Maple) Inc.	2700 Teston Road	Vaughan	Request to have lands removed from Greenbelt Plan area and be redesignated to Settlement Area for future development	Process for Boundary Confirmation/Adjustment
	1539028 Ontario Inc.	5315 Kirby Road	Vaughan	Request to have lands removed from Greenbelt Plan area and be redesignated to Settlement Area for future development	Process for Boundary Confirmation/Adjustment
24	Nizza Enterprises	2354 Ravenshoe Road	Georgina	Request for current polices and designations in the Greenbelt Plan and Growth Plan applying to the subject lands be maintained and carried	Input Received

**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

				forward in subsequent drafts of the plans.	
25	Golden Age Village for the Elderly	11088 Pine Valley Drive	Vaughan	Request for additional permissions for property designated Protected Countryside under the Greenbelt Plan.	Input Received
26	1451044 Ontario Ltd.	10800 Weston Road	Vaughan	Request for additional permissions for property designated Protected Countryside under the Greenbelt Plan.	Process for Boundary Confirmation/Adjustment
27	Pittiglio	Con 4 Part Lot 31 and Part Lot 32	Vaughan	Request for boundary adjustment and review of natural heritage features on subject property designated Protected Countryside under the Greenbelt Plan.	Process for Boundary Confirmation/Adjustment
28	Milani	*See submission	King	Request for redesignation of subject property from Protected Countryside to enable the expansion of the Schomberg settlement area	Process for Boundary Confirmation/Adjustment
29	Krause	3 Sawmill Lane	Whitchurch-Stouffville	Looking for Oak Ridges Moraine Conservation Plan modifications to permit two severances on the lands	Input Received
30	11650 Keele Street	11650 Keele Street	Vaughan	Request for additional permissions for portion of property located within the Greenbelt Plan area or request to have lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
31	1529253 Ontario Ltd	NE Corner of Kipling Avenue and Teston Road	Vaughan	Request to have lands removed from Greenbelt Plan area and be redesignated to Settlement Area for the development of a Community Facility	Process for Boundary Confirmation/Adjustment
32	Catalia Development Group	1069 Vandorf Sideroad	Aurora	Request to have lands redesignated from Natural Linkage and Countryside designations under the Oak Ridges Moraine Conservation Plan area to allow for future development of the subject property.	Process for Boundary Confirmation/Adjustment
33	Willowgrove	11737 McCowan Road	Whitchurch-Stouffville	Request to maintain 'whitebelt' designation in the Greenbelt Plan to allow for the possibility of an urban boundary expansion of Stouffville	Process for Boundary Confirmation/Adjustment

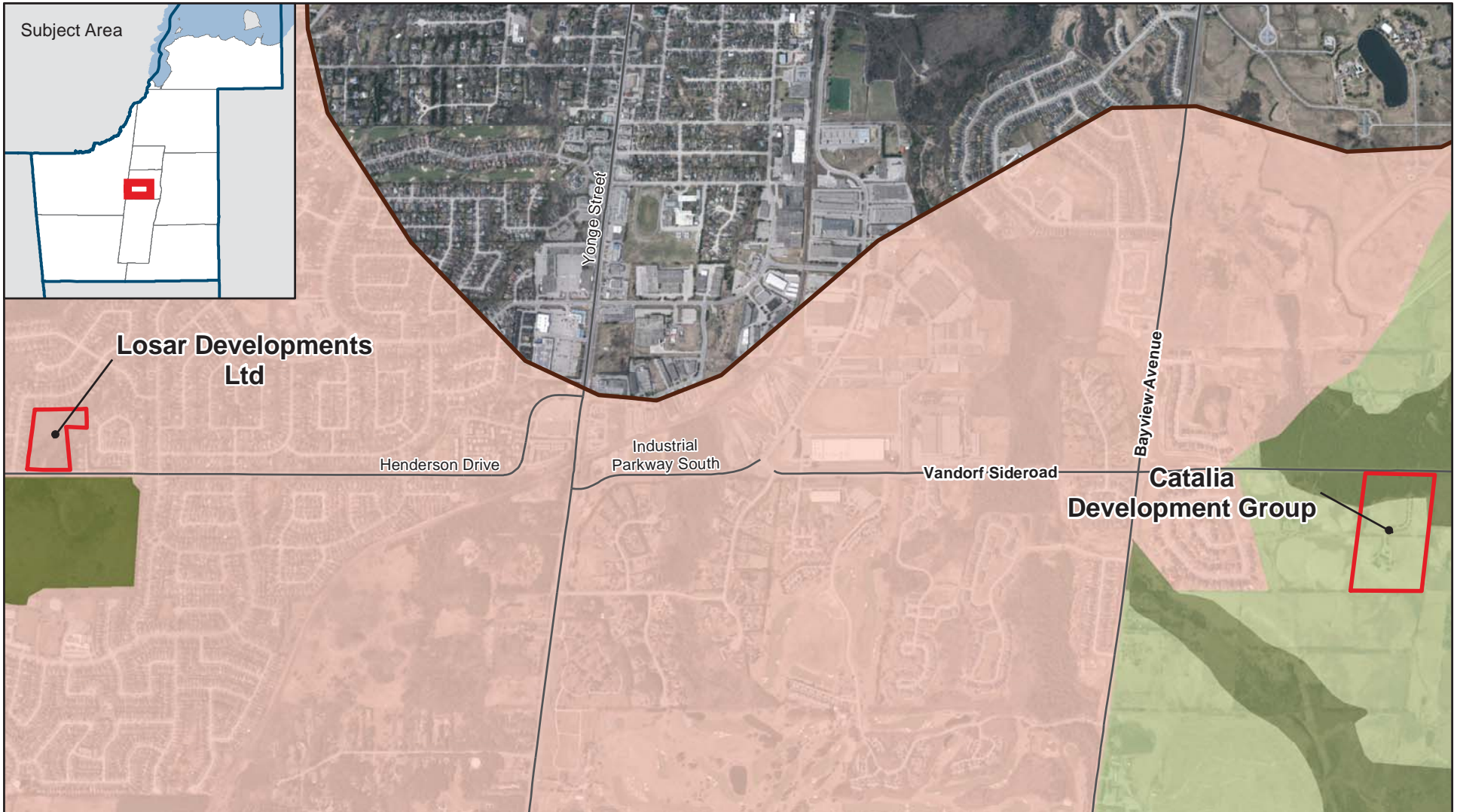
**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

34	Meadow Valley Garden Centre	12201 Keele Street	Vaughan	Request for additional permissions for property designated under the Oak Ridges Moraine Conservation Plan.	Input Received
35	North Markham Landowners Group	Robinson Glen Block	Markham	Request for additional permissions for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
		Employment Block	Markham	Request for additional permissions for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
36	Copper Creek Golf Club	*see submission	Vaughan	Request for additional permissions related to active public parks and public stormwater management facilities for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
37	Angus Glen Landowners Group	*see submission	Markham	Request for additional permissions for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
38	Leslie Elgin Developments Inc	*see submission	Richmond Hill	Request for additional permissions for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
39	Block 41 Landowners Group	*see submission	Vaughan	Request for additional permissions for property located within the Greenbelt Plan area or request to have boundary adjusted and lands removed from the Greenbelt Plan area.	Process for Boundary Confirmation/Adjustment
40	York Regional Police Association	365 Morning Sideroad	East Gwillimbury	Request for boundary adjustment on subject property's Protected Countryside designation under the Greenbelt Plan	Process for Boundary Confirmation/Adjustment

**York Region – Site-Specific Landowner Requests
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

	19231 Bathurst Street	East Gwillimbury	Request for boundary adjustment on subject property's Protected Countryside designation under the Greenbelt Plan	Process for Boundary Confirmation/Adjustment
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1. **Process for Employment Lands** - The Province is requested to develop a process allowing access to strategic employment lands if deemed required to deliver growth plan employment forecasts by an upper of single tier municipality.
2. **Process for Boundary Confirmation/Adjustment** - The Province is requested to develop a process to confirm or correct Plan area boundaries, including the outer boundary of the Greenbelt Plan, and designation boundaries within the Plan areas, excluding Natural Core and Natural Linkage area of the ORMCP. In some instances, site-specific requests support the Region's request that the greenbelt plan area not be expanded onto developable 'whitebelt' lands in York Region. Where requests pertain to the southern boundary of the Oak Ridges Moraine in York Region, east of Bathurst Street, the Region is supportive of the Oak Ridges Moraine (ORM) Plan policy which allows confirmation through survey of the 245 CDVD28 (contour elevation).
3. **Input Received** – These requests are provided to the Province as input received throughout our review process.

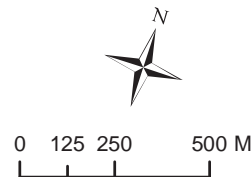


Site-Specific Landowner Requests – Town of Aurora

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

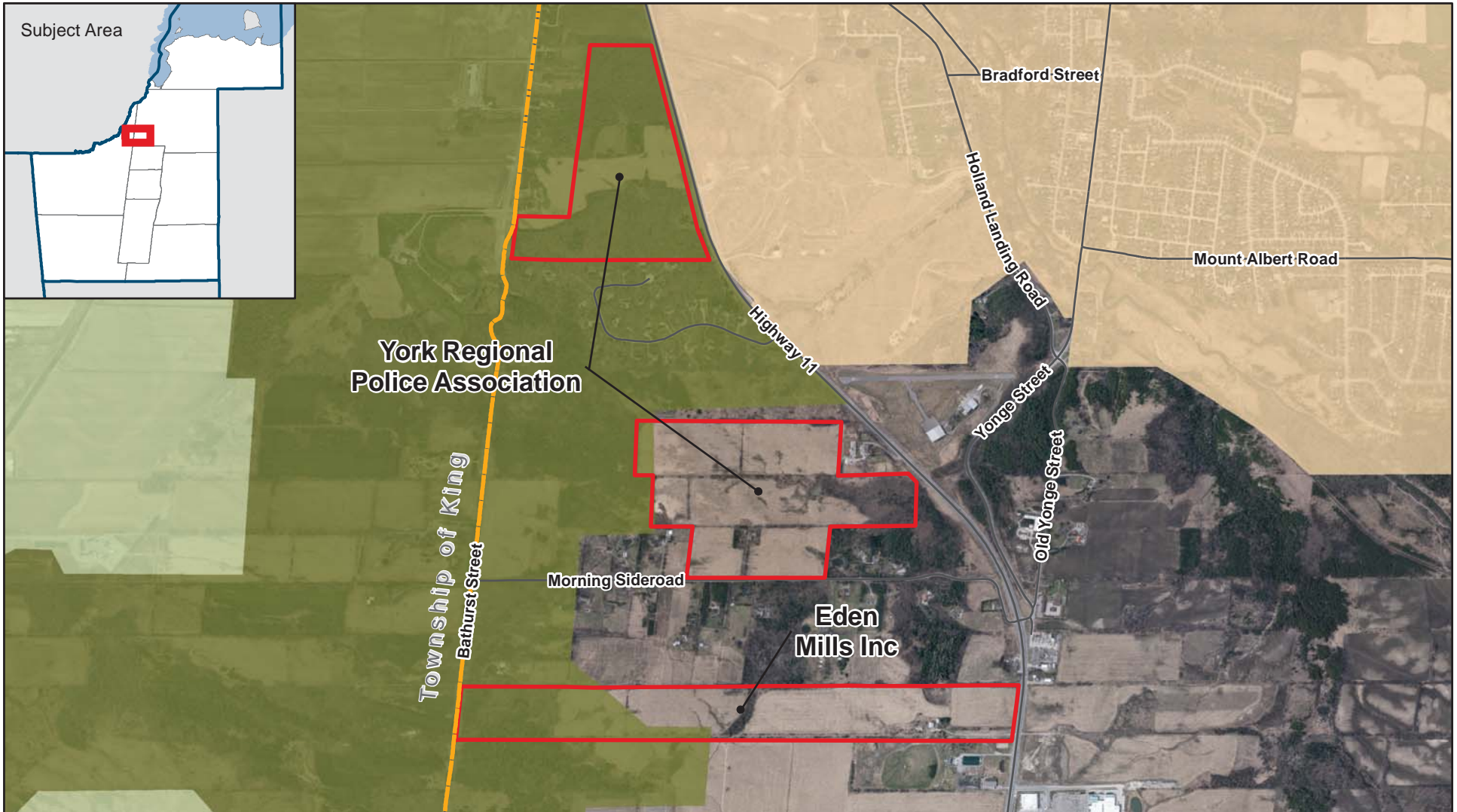
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Legend

- | | |
|------------------------------------|-------------------------------|
| Municipal Boundary | Boundary |
| Regional Boundary | Oak Ridges Moraine Core |
| Stakeholders | ORMCP Designation Countryside |
| Municipal Road | Hamlet |
| Freeway | Linkage |
| Provincial Highway | Settlement |
| Greenbelt Plan Designation Hamlets | Urban |
| Towns and Villages | |
| Natural Heritage System | |
| Protected Countryside | |

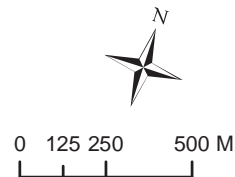


Site-Specific Landowner Requests – Town of East Gwillimbury

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

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Legend

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| Municipal Boundary | Oak Ridges Moraine Boundary |
| Regional Boundary | ORMCP Designation |
| Stakeholders | Core |
| Municipal Road | Countryside |
| Freeway | Hamlet |
| Provincial Highway | Linkage |
| Greenbelt Plan Designation Hamlets | Settlement |
| Towns and Villages | Urban |
| Natural Heritage System | |
| Protected Countryside | |

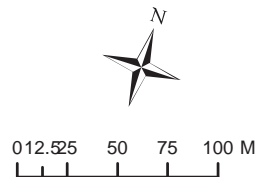


Site-Specific Landowner Requests – Town of Georgina

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

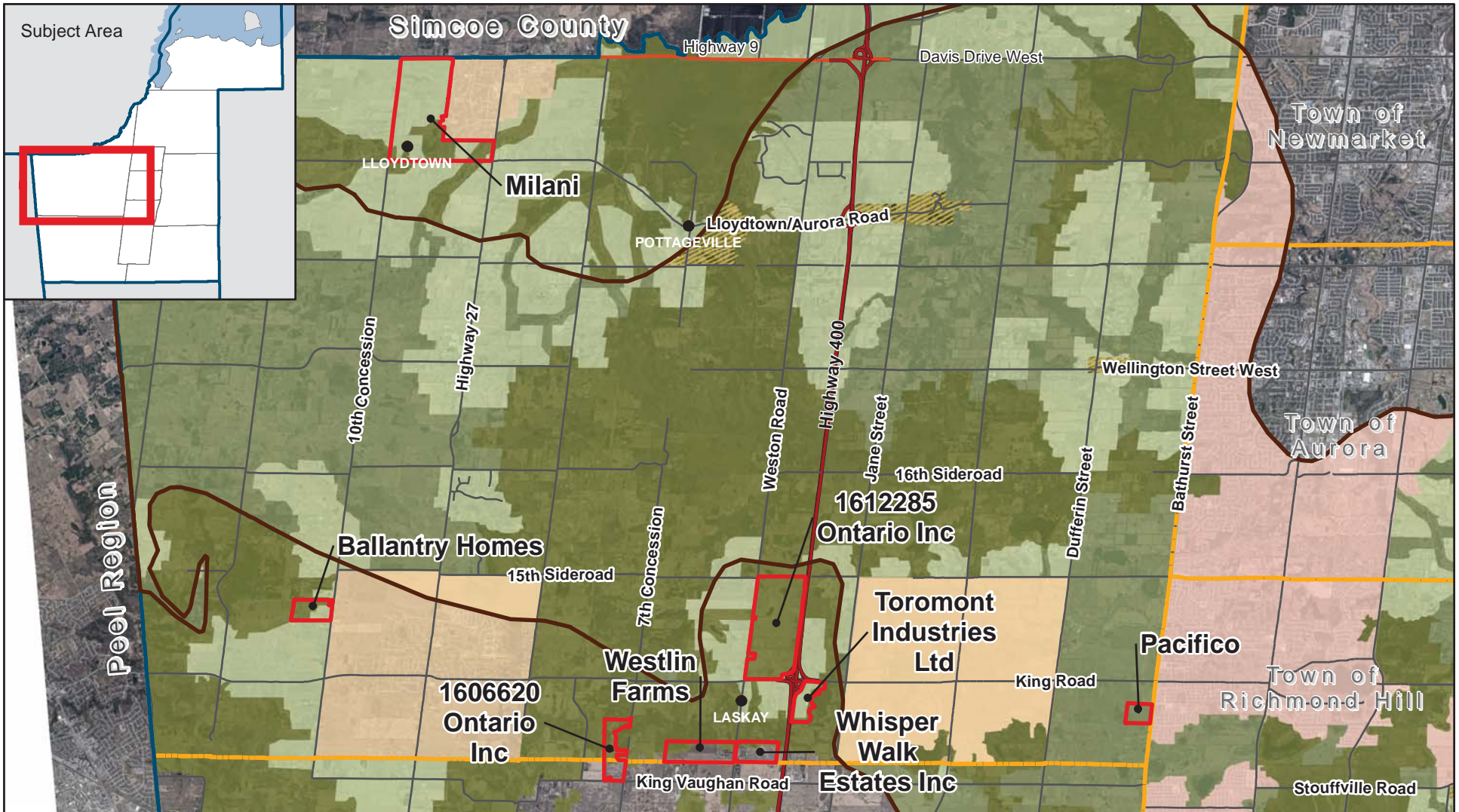
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Legend

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| Municipal Boundary | Oak Ridges Moraine Boundary |
| Regional Boundary | ORMCP Designation Core |
| Stakeholders | ORMCP Designation Countryside |
| Municipal Road | ORMCP Designation Hamlet |
| Freeway | ORMCP Designation Linkage |
| Provincial Highway | ORMCP Designation Settlement |
| Greenbelt Plan Designation | ORMCP Designation Urban |
| Hamlets | |
| Towns and Villages | |
| Natural Heritage System | |
| Protected Countryside | |

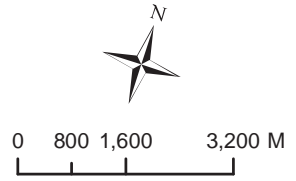


Site-Specific Landowner Requests – Township of King

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

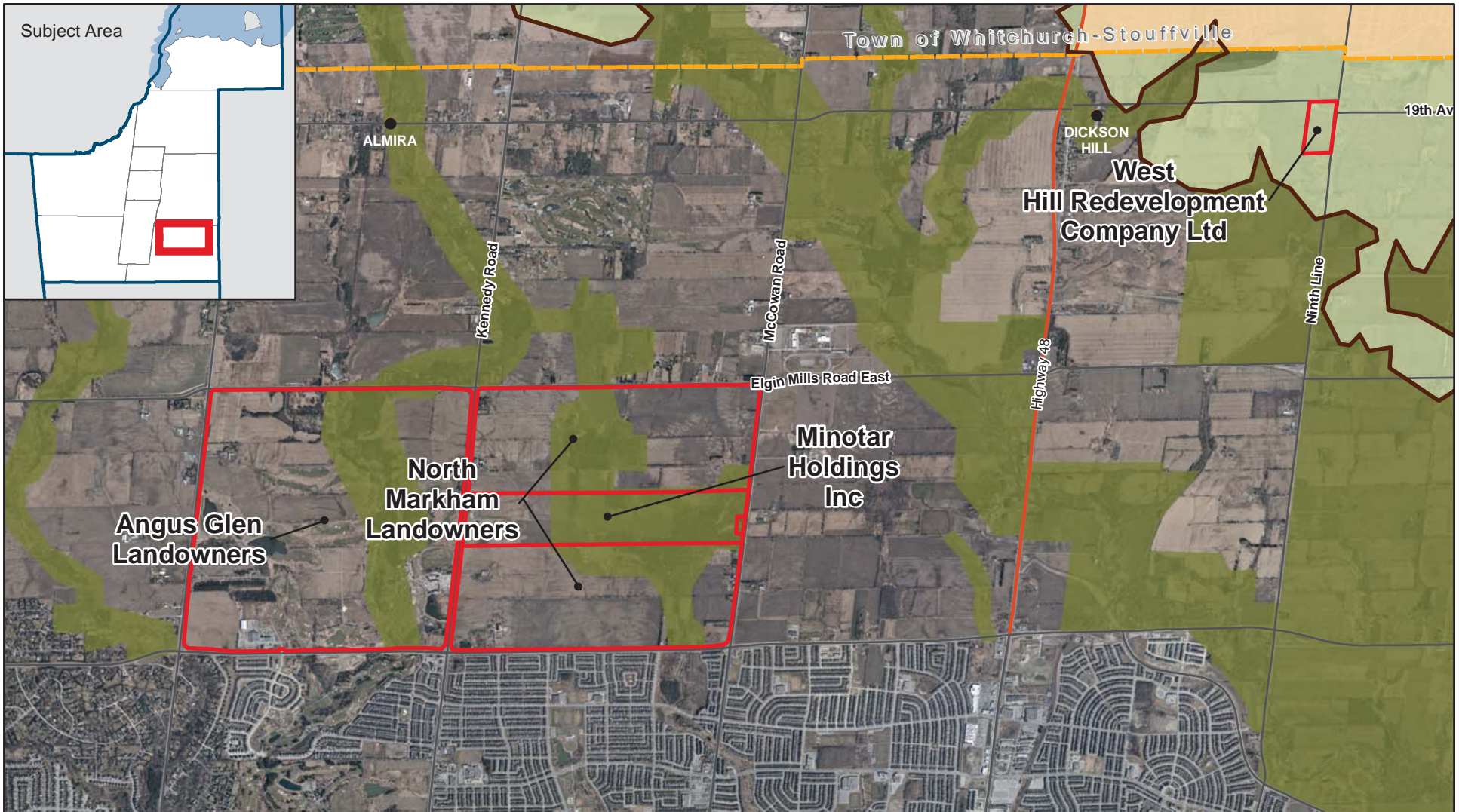
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Legend

Stakeholders	Boundary
Municipal Boundary	Oak Ridges Moraine
Regional Boundary	Core
Municipal Road	Countryside
Freeway	Hamlet
Provincial Highway	Linkage
Greenbelt Plan Designation	Settlement
Hamlets	Urban
Towns and Villages	
Natural Heritage System	
Protected Countryside	



Site-Specific Landowner Requests – City of Markham

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

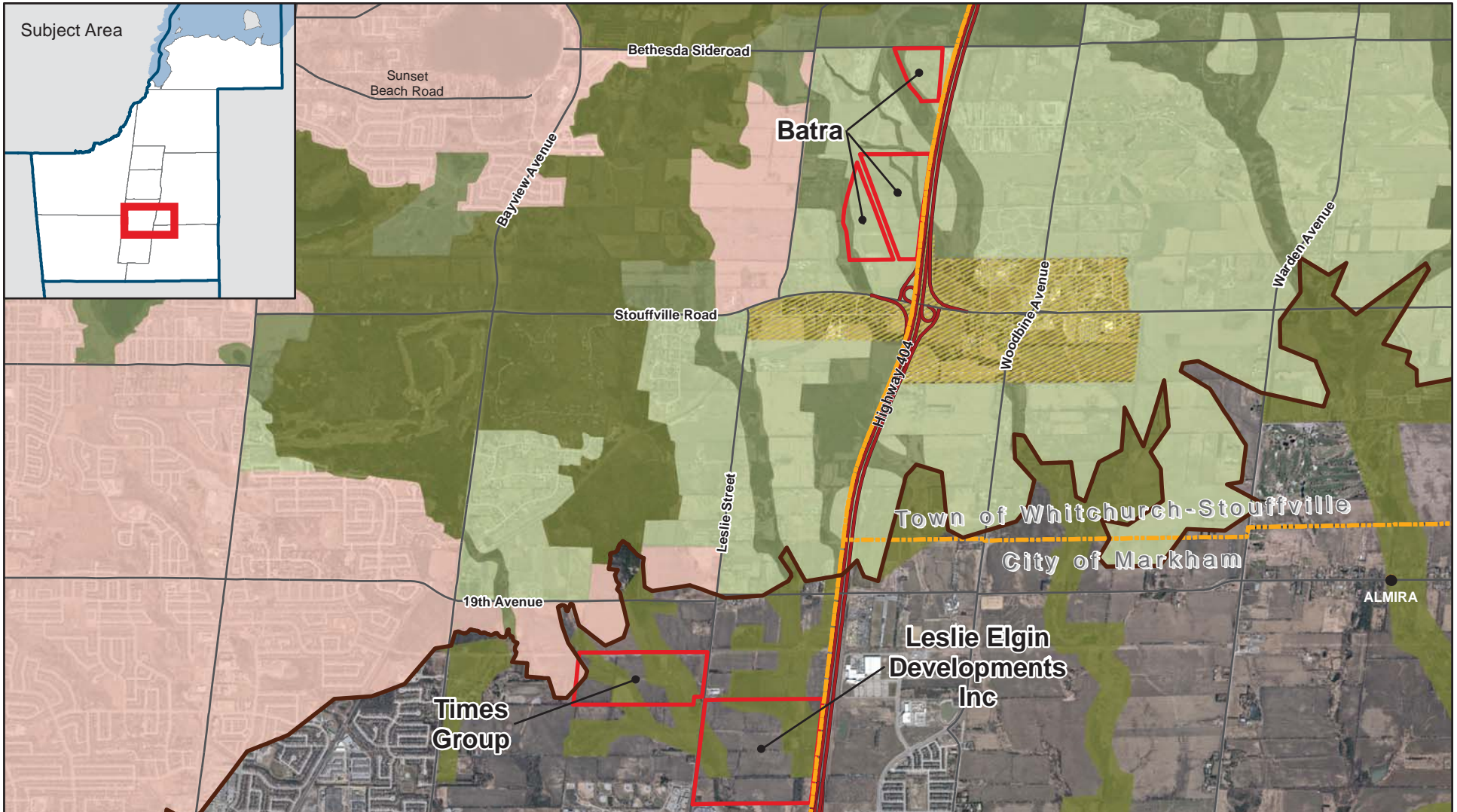
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Legend

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| Municipal Boundary | Oak Ridges Moraine Boundary |
| Regional Boundary | ORMCP Designation Core |
| Stakeholders | ORMCP Designation Countryside |
| Municipal Road | ORMCP Designation Hamlet |
| Freeway | ORMCP Designation Linkage |
| Provincial Highway | ORMCP Designation Settlement |
| Greenbelt Plan Designation | ORMCP Designation Urban |
| Hamlets | |
| Towns and Villages | |
| Natural Heritage System | |
| Protected Countryside | |

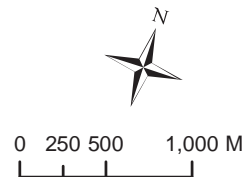


Site-Specific Landowner Requests – Town of Richmond Hill

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

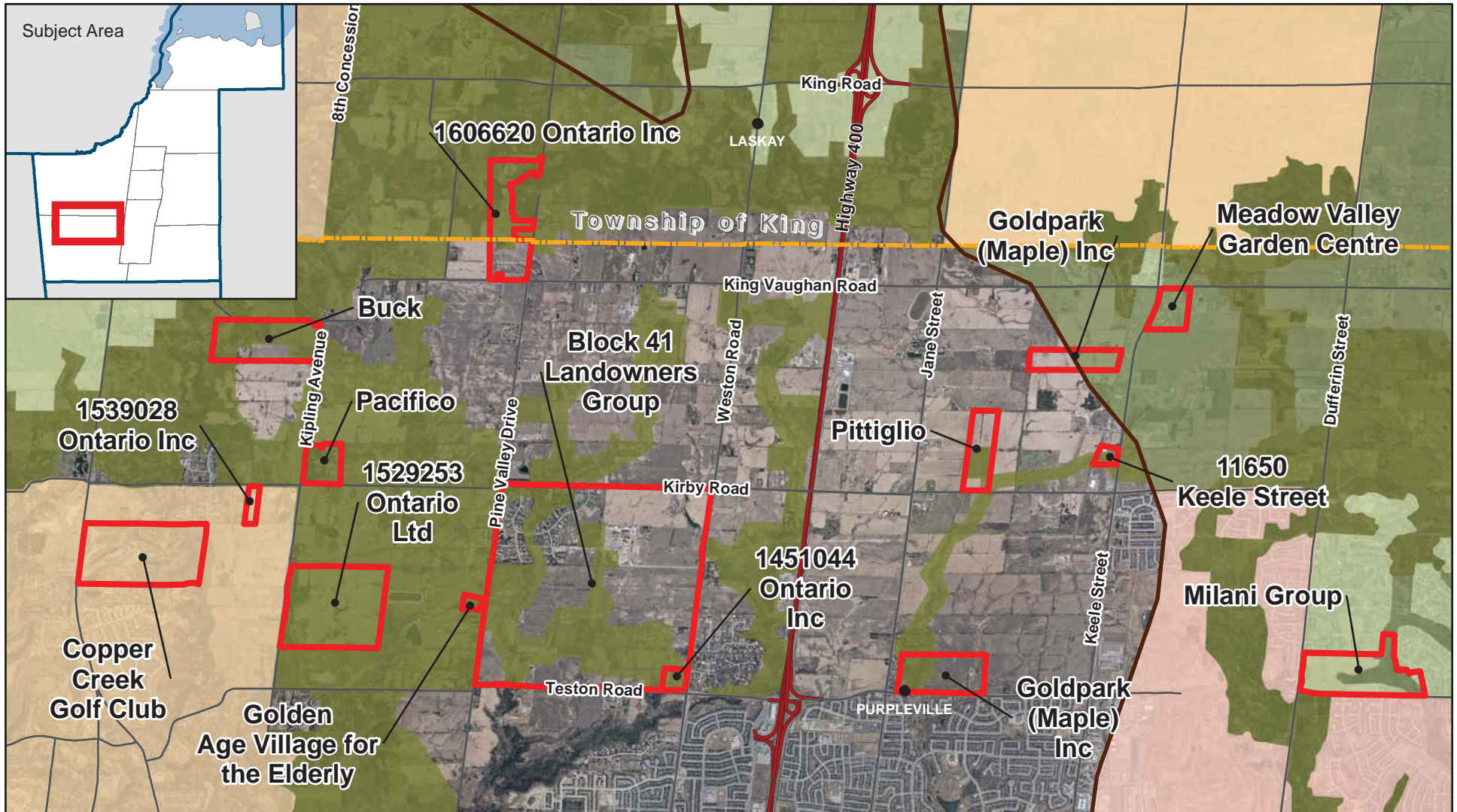
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Legend

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| Regional Boundary | ORMCP Designation |
| Stakeholders | Core |
| Municipal Road | Countryside |
| Freeway | Hamlet |
| Provincial Highway | Linkage |
| Hamlets | Settlement |
| Towns and Villages | Urban |
| Natural Heritage System | |
| Protected Countryside | |

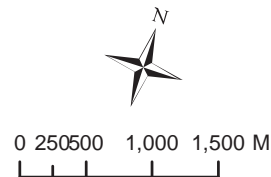


Site-Specific Landowner Requests – City of Vaughan

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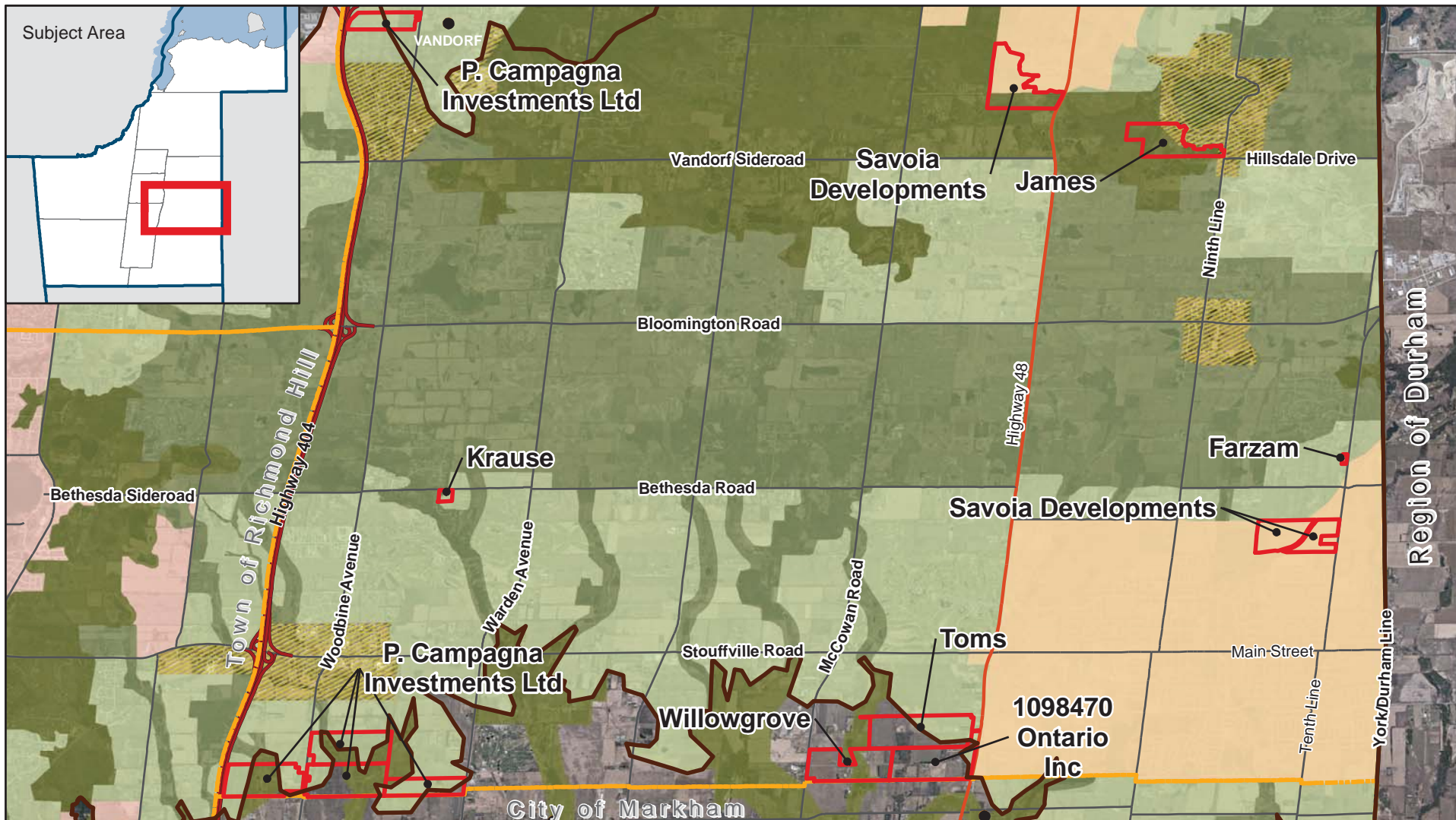
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Legend

- | | |
|-------------------------|-------------------|
| Municipal Boundary | Boundary |
| Regional Boundary | ORMCP Designation |
| Stakeholders | Core |
| Municipal Road | Countryside |
| Freeway | Hamlet |
| Provincial Highway | Linkage |
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| Towns and Villages | Urban |
| Natural Heritage System | |
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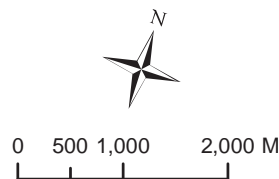


Site-Specific Landowner Requests – Town of Whitchurch-Stouffville

2015 Co-ordinated Provincial Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, May 21, 2015

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Legend	
	Stakeholders
	Municipal Boundary
	Regional Boundary
	Municipal Road
	Freeway
	Provincial Highway
	Hamlets
	Towns and Villages
	Natural Heritage System
	Protected Countryside
	Boundary
	ORMCP Designation Core
	Countryside
	Hamlet
	Linkage
	Settlement
	Urban
	Oak Ridges Moraine

**York Region - Local Municipal Comments and Positions
2015 Coordinated Review of the Growth Plan, Greenbelt Plan and ORMCP**

Please click the local municipality name to access the agenda and/or report associated with the 2015 Coordinated Provincial Plans Review for each local municipality.

Local Municipality	Status
Aurora*	Staff report with recommendations to be considered by Aurora Committee of the Whole on May 19, 2015 and Town Council on May 26, 2015
East Gwillimbury	East Gwillimbury Committee of the Whole Report of May 5, 2015 with recommendations to be considered by Town Council on May 19, 2015
Georgina	Staff report from Planning and Building Department of May 13, 2015 with recommendations was considered by Georgina Council on May 13, 2015
King	King Committee of the Whole Report of May 11, 2015 with recommendations to be considered by Town Council on May 25, 2015
Markham*	Staff report with recommendations to be considered by Markham Development Services Committee on May 19, 2015 and City Council on May 26, 2015
Newmarket*	Staff report with recommendations to be considered by Newmarket Committee of the Whole on May 25, 2015 and Town Council on June 1, 2015
Richmond Hill	Staff report with recommendations to be considered by Richmond Hill Committee of the Whole on May 19, 2015 and Town Council on May 26, 2015
Vaughan	Vaughan Committee of the Whole Report of May 5, 2015 with recommendations to be considered by City Council on May 19, 2015
Whitchurch-Stouffville	Staff report with recommendations to be considered by Whitchurch-Stouffville Council on May 19, 2015

* Reports pending and/or subject to confirmation