

Attachment #2 – Policy Directions Report - Submissions and Response Chart
Part 4A - Public Submission – October 2020

Overview

This document is part 4A of 7 that provides written submissions in verbatim and staff responses on comments related to the Regional Official Plan Review (excluding IGMS/PGC which are addressed in the Integrated Growth Management Strategy Submissions and Response Chart) for October 2020. The policy directions referenced in the staff response column have not been endorsed by Regional Council.

The full Policy Directions Report Submission and Response Chart includes the following parts:

- Part 1 - Public Authorities
- Part 2 - Advisory Committees and Stakeholders
- Part 3 - Public Submission – June 2020 to September 2020
- Part 4 - Public Submission – October 2020**
- Part 5 - Public Submission - November 2020 to November 2021
- Part 6 – Indigenous Peoples
- Part 7 – Additional Submissions

The document is organized into four columns: 'No.', 'Source', 'Submission', and 'Response'.

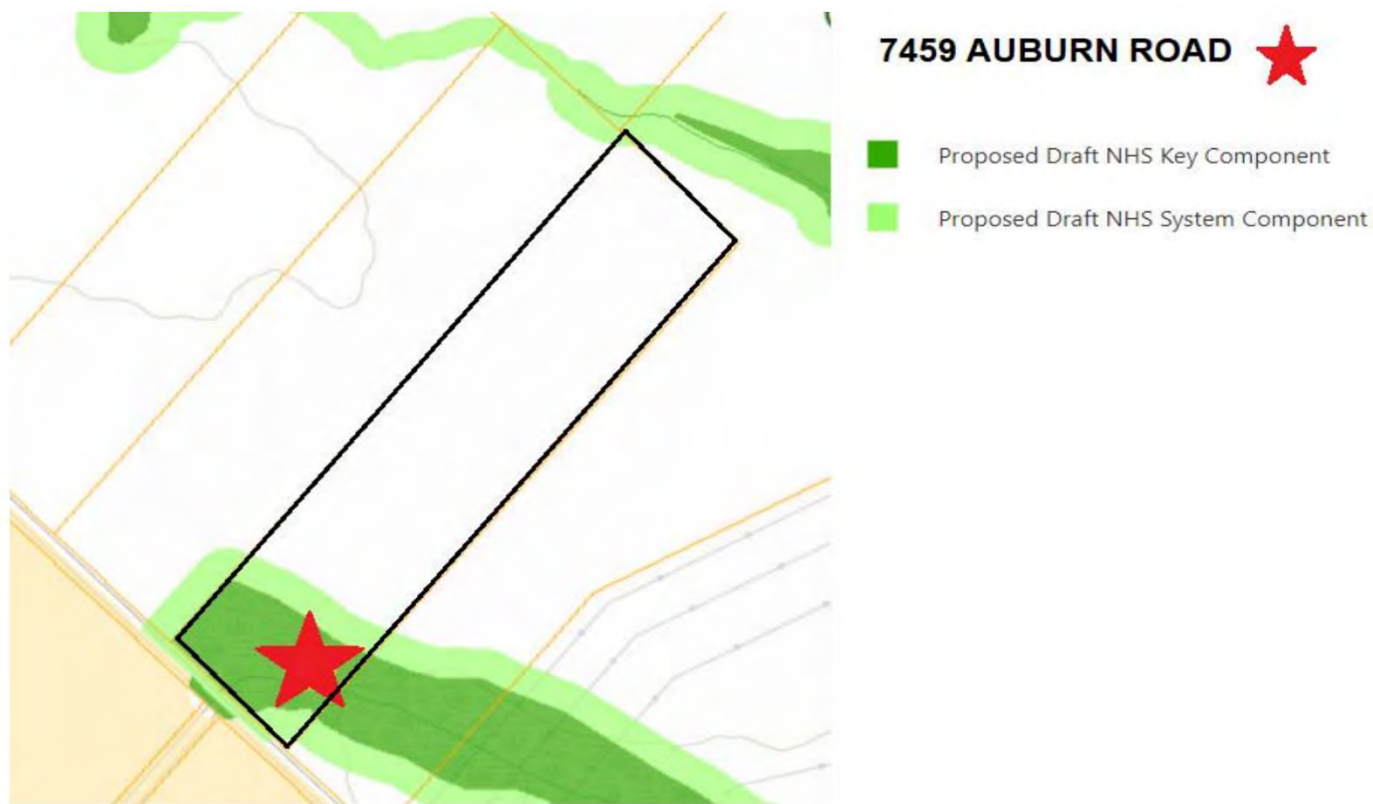
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Submissions & Responses

No.	Source	Submission	Response
1.	2163832 Ontario Inc	<p>Attached per email dated 2020-10-01 (G&L Group)</p> <p>RE: Request for reconsideration of Regional Official Plan Review</p> <p>To whom it may concern,</p> <p>2163832 Ontario Inc. 291 Fleming Dr. Milton, ON L9T-5X9 2163832 Ontario Inc is seeking an appeal to Halton Region to reconsider the identified natural heritage features in the Regional Official Plan Review for property municipally addressed as 7459 Auburn Road, Milton (“Subject Property”).</p> <p>The current use of the subject property is an agricultural use that aligns with the intent of the Regional and Municipal Official Plans as well as the amended Town of Milton Zoning By-Law 144-2003.</p> <p>The subject property is given two designations under the Draft Halton Regional Plan as a Natural Heritage System (NHS) Key Component and an NHS System component, shown of Figure 1.</p>  <p>FIGURE ONE: Halton Regional Official Plan Review Map</p> <p>2163832 Ontario Inc., has been utilizing the entire property for farming purposes. The frontage of the property abutting Eighth Line does not meet the properties of a wetland feature. Since it is good farming land, the surface area of the property does not contain of land characteristics that fall under the definition outlined under Section 28 (25) of the Conservation Authority Act for a “wetland”.</p>	<p>Mapping of the draft proposed Natural Heritage System for the property was provided to the landowner. The Provincial government requires municipalities through their Official Plans to identify a natural heritage system, including key features such as wetlands and woodlands and include policies to protect the long-term ecological function and biodiversity of the system. The Regional Natural Heritage System (RNHS) is a land use designation within the Regional Official Plan that protects and enhances natural features and functions. The draft proposed RNHS mapping on the property is because of the key features identified as wetlands and a watercourse traversing the property that are regulated by Conservation Halton and identified by the Ministry of Natural Resources and Forestry.</p> <p>The wetland Geographic Information System (GIS) data sources used to map the wetlands within the RNHS are managed and provided by Conservation Halton and the Ministry of Natural Resources and Forestry. It is Regional Staff’s understanding that the property owner is engaged in on-going litigation with Conservation Halton in accordance with Section 28 of the Conservation Authorities Act, regarding regulated wetlands on the property. Until such time that the on-going litigation has been resolved, the draft RNHS must reflect the most current wetlands GIS data that are provided by Conservation Halton and the Ministry of Natural Resources and Forestry. If during the Regional Official Plan Review process, the property owner and Conservation Halton resolve the wetland matter and the GIS wetland data is changed, then the Region would be in a position to update our RNHS mapping to reflect those changes.</p> <p>Please note that Policy Direction RAS-1 (also see NH-6) outlines proposed mapping and land designations and overlays. RAS-1 recommends the designation of prime agricultural areas, rural lands and key natural heritage features with the remaining NHS as an overlay.</p>

No.	Source	Submission	Response
		<p>2163832 Ontario Inc., is requesting Halton Region to reassess the designation for natural heritage features on the subject property. If any additional information is required, please contact the undersigned.</p> <p>Samrah Haq, Urban Planner</p>	
2.	Protecting Escarpment Rural Land (PERL)	<p>Email dated 2020-10-01</p> <p>Hi Rick, I hope you and your family are well.</p> <p>Ever since the Burlington Official Plan has been in the various stages of draft, public comments and review, I have been trying to get a change to the rural policy on "Special Events" Burlington policy #9.1.2 See email chain below.</p> <p>It does not appear like Burlington has modified the policy with respect to requiring only "registered charitable organizations", since they are deferring to the Region... see last response from Kelly Cook. That requirement is not fair to community groups like PERL, who do not qualify for registered charitable organization status. The reasons for requiring only registered charitable organizations was never explained. We believe that requirement is unnecessary. PERL would not have been able to build the determinative opposition to the last Nelson Aggregate quarry application without fund-raising concerts to hire qualified experts. As you may know, governments do not provide any community opposition groups with any funding.</p> <p>My request is that the Halton Region's new draft ROP not have a requirement for only "registered charitable organizations". As I suggested to Burlington, a Special Events policy requiring that community / environmental organizations be "incorporated", instead of registered charity, should satisfy whatever the concerns that Burlington has.</p> <p>We also would like the Burlington policy modified accordingly.</p> <p>With Nelson Aggregate again trying to open up two new quarries on Mount Nemo, we will have to vigorously oppose them, which requires fundraising.</p> <p>Thank you in advance, Roger Goulet PERL Executive Director</p>	<p>Policy Direction RAS-2 recommends updating the policies of the Regional Official Plan to broaden permissions and allow for more opportunities for agriculture-related uses and on-farm diversified uses as outlined in Provincial policies, plans, and guidelines. RAS-2 should primarily follow the direction of the Provincial Policy Statement, 2020, Growth Plan, Greenbelt Plan, and the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas for clear and consistent application of the policies. The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas is a resource that residents, businesses, and community groups may refer to for specific information regarding events in prime agricultural areas. Regional staff recognize the issue of special events in the rural area and are exploring opportunities on how to address this in Regional planning policy and acknowledge the importance of collaboration with Local Municipalities.</p>

No.	Source	Submission	Response
3.	Burlington Agriculture & Rural Affairs Advisory Committee	<p>Email dated 2020-10-06</p> <p>Sent on behalf of Jo-Anne Rudy, Committee Clerk, City of Burlington</p> <p>Good day,</p> <p>At the City of Burlington Council meeting held on September 28, 2020, the following recommendation was approved:</p> <p style="padding-left: 40px;">Direct the Director of Community Planning to submit the appendices to Community Planning Department report PL-28-20 as the City of Burlington Submission on the Region of Halton's Official Plan Discussion Papers by the comment submission deadline of September 28, 2020; and</p> <p style="padding-left: 40px;">Direct the Director of Community Planning to provide any additional comments to the Region, if any, upon Council approval on September 28, 2020; and</p> <p style="padding-left: 40px;">Request that the Region consider, during their Municipal Comprehensive Review, adjusting the Major Transit Station Area boundaries around the Aldershot GO station to exclude the Clearview/Queen Mary/ St. Matthews neighbourhood; and</p> <p style="padding-left: 40px;">Direct the Director of Community Planning to include the Burlington Agriculture & Rural Affairs Advisory Committee's comments, as outlined in Appendix C to community planning report PL-28-20, with the City of Burlington's Submission on the Region of Halton's Official Plan Discussion Papers.</p> <p>If you have any questions, please contact Rosa Bustamante, Manager of Mobility Hubs at rosa.bustamante@burlington.ca</p> <p>For more information on this meeting or other meetings of committee and council, please visit the city's online calendar at www.burlington.ca/calendar.</p> <p>If you delegated at Committee, we would appreciate hearing about your experience. Please take a few minutes to fill out the Delegation Survey</p> <p>Kindest regards,</p> <p>Roxanne Gosse Committee Assistant Clerk's Department City of Burlington</p> <p>Attached per above email dated 2020-10-06</p> <p>Appendix C to PL-28-20</p> <p>HALTON REGIONAL OFFICIAL PLAN REVIEW BURLINGTON AGRICULTURAL AND RURAL AFFAIRS ADVISORY COMMITTEE FEEDBACK</p>	<p>Comments regarding the relationship between agriculture and the NHS and agricultural mapping have the opportunity to be explored through Policy Direction RAS-1. RAS-1 (also see NH-6) recommends the designation of prime agricultural areas, rural lands, and key natural heritage features with the remaining NHS as an overlay and is reflective of Mapping Option 2 described in the Rural and Agricultural System Discussion Paper. The designations proposed in RAS-1 are intended to provide greater protection for the natural environment while preserving Halton's valuable (and finite) agricultural land base. The online mapping viewer available through the Region's website provides information on current mapping and proposed draft mapping across Halton. Landowners can refer to this online mapping tool for information regarding their property. The interactive function allows users to toggle between layers and turn on as many or as few layers as they desire. Despite BARAAC's recommendation to not designate all key features, Provincial policy directs municipalities to protect all key features from development and site alteration, including new agricultural buildings, to ensure conformity. Additional information on this matter can be found on OMAFRA's website and in the Implementation Guidelines for Permitted Uses in Prime Agricultural Areas. Moreover, BARAAC's proposed Modified Option 2 mapping approach does not allow for the protection of all key features and does not meet provincial conformity; therefore, this mapping cannot be advanced by Halton Region.</p> <p>BARAAC's comments on Agriculture-related uses, on-farm diversified uses, and agri-tourism uses align with the policy direction recommended in RAS-2. RAS-2 recommends updating the policies of the Regional Official Plan to broaden permissions and allow for more opportunities for agriculture-related uses and on-farm diversified uses as outlined in Provincial policies, plans, and guidelines to further support Halton's agricultural community. RAS-2 should primarily follow the direction of the Provincial Policy Statement, 2020, Growth Plan, Greenbelt Plan, and the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas for clear and consistent application of the policies. The recommendations to update policies will also allow local municipalities to provide more detailed policies and/or restrictions through their respective planning tools to manage any on-farm diversified uses that have a high potential for impact.</p> <p>RAS-3 outlines the recommended approach for permitting cemeteries within Halton and provides an opportunity to address comments. BARAAC's comments on cemeteries align with other consultation comments which revealed preference for cemeteries to be directed to settlement areas. Additional feedback from broader consultation suggested cemeteries being permitted on rural lands to meet unmet demands, support complete communities, and satisfy other criteria. It was also recommended that details such as cemetery size be determined by local municipalities. Additionally, there was broad support from consultation to restrict cemeteries in prime agricultural</p>

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		<p>WHEREAS, City staff will be engaging with Halton Region throughout the Regional Official Plan Review process, and communication and collaboration with the agricultural community at the earliest stages of policy development will be critical in ensuring sensitivity to local context;</p> <p>NOW THEREFORE BE IT RESOLVED THAT the Burlington Agricultural and Rural Affairs Advisory Committee (BARAAC) requests that Council direct staff to consider the following general recommendations throughout the City's participation in the Regional Official Plan Review process:</p> <ul style="list-style-type: none"> • Policies should be streamlined across the City, Region, Province and Conservation Authorities through consistent language and avoidance of unnecessary duplication. Mapping should be ground-truthed, clearly delineated, consistent across all agencies, and accessible to landowners, with clear corresponding policies to convey the implementation priority of the various designations and overlays, particularly in relation to Prime Agricultural Areas and the Natural Heritage System. • Permitted uses should default to the most permissive applicable Provincial policies and, where more restrictive policies are proposed, a comprehensive study and public engagement process should be undertaken to provide appropriate planning justification and documentation of policy intent. • Notice to landowners for proposed Official Plan mapping changes should be on an individual basis. Notices should be robust and direct (e.g. direct mail), as local print media is often not available to rural residents. Notices should be accompanied by a plain language explanation of why the changes are occurring and which data are informing the updates. The process for ground-truthing schematic mapping that represents a policy framework, rather than data verified at the site level, should be explained (i.e. refinement of Natural Heritage System or Regulated Area mapping). <p>WHEREAS, City staff will be submitting a formal response to the five Regional Official Plan Review discussion papers released on July 15, 2020 for a 75-day consultation period, and has engaged with BARAAC to provide feedback in relation to the 'Rural and Agricultural System' and 'Natural Heritage' papers;</p> <p>NOW THEREFORE BE IT RESOLVED THAT BARAAC requests that also Council direct staff to consider the following detailed recommendations throughout the City's participation in the Regional Official Plan Review process, in addition to the general recommendations provided above, and that these recommendations be circulated to Halton Region as part of the City's submission:</p> <p>ROPA 38 REVIEW</p> <p>At a minimum, some review of the ROP performance relative to desired outcome should be undertaken before amendment policies are suggested i.e. a review of policy in terms of achieving positive outcomes for agriculture as compared to just creating policy that meets planning requirements Other review goals should include: making the amended ROP clearer and more easily interpreted, reducing policy duplication, and to review municipal implementation. Another useful review area would be what policies motivates land stewardship?</p> <p>The current discussion paper does not appear to have considered policy implementation issues, or review on the ground or user impacts of policy options. It also does not recognize or reference the 2019 Regional Council Motion on ROP Designation of Agricultural land.</p>	<p>areas as these areas are a valuable and finite resource, consistent with comments received by the BARAAC.</p> <p>BARAAC's feedback regarding AIAs signaled greater clarification is needed to know when an AIA is triggered. Policy Direction RAS-4 recommends that Regional Official Plan policies provide greater specificity for when an Agricultural Impact Assessment is required in accordance with Provincial plans and policies: settlement area boundary expansions, new or expanding mineral aggregate operations, infrastructure in the rural area, and any proposed development that removes land from Prime Agricultural Areas. RAS-4 also recommends the Regional Official Plan continue to reference Regional Agricultural Impact Assessment Guidelines and review the Guidelines for consistency per any updates to Provincial guidance documents. BARAAC's proposal for smaller projects or uses on farm to be exempt from an AIA has the opportunity to be explored through RAS-4.</p> <p>As part of the ongoing review and update to the Natural heritage component of the Regional Official Plan, Natural Heritage System policies and mapping will require several updates to:</p> <ul style="list-style-type: none"> • be consistent with the Provincial Policy Statement and conform to Provincial Plans; • improve and clarify existing natural heritage policies; • identify planning objectives needed to preserve and enhance the Region's Natural Heritage System and; • improve the accuracy of the Natural Heritage System mapping. Refinements to the mapping may result in removals or additions to the Natural Heritage System. <p>Regional staff continues to support the RNHS policy framework and believe it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application.</p> <p>The policy directions for Natural Heritage (i.e., NH1 to NH-11) were informed by feedback received from groups including the public, stakeholders, and agencies. More fulsome details are available in the Policy Directions Report. It is important to note Policy Direction – NH-11 – Update and enhance current policies in the Regional Official Plan to recognize agriculture in components of the Natural Heritage System. Natural heritage and agriculture are not mutually exclusive in terms of where they are located in the rural area. In many instances, farming is occurring within the Natural Heritage System and in some cases, buildings already exist within key natural heritage features. The Regional Official Plan currently permits certain agricultural buildings and farm operation uses within the Regional Natural Heritage System but outside of the Niagara Escarpment Natural Area or the Key Features other than those areas where the only Key Feature is a</p>

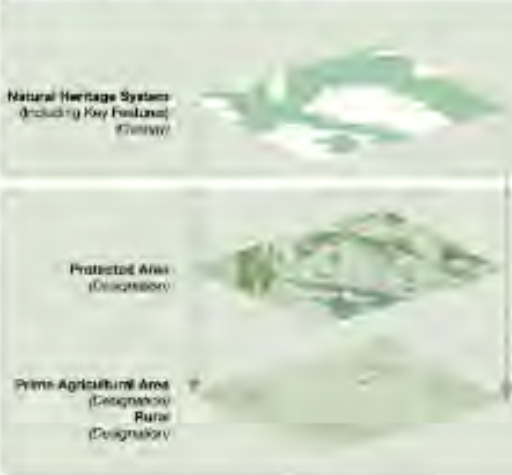

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		<p>A conformity exercise vis-a-vis Provincial Policy should not be the focus of the review but should rather be seen as secondary to achieving desired Agricultural and Rural outcomes.</p> <p>The ROPA 38 “Agricultural System” was developed through the OMB process without appropriate public consultation. The PPS 2020 now clearly defines the Agricultural System as</p> <p>“A system comprised of a group of inter-connected elements that collectively create a viable, thriving agricultural sector. It has two components:</p> <p>a) An agricultural land base comprised of prime agricultural areas, including specialty crop areas, and rural lands that together create a continuous productive land base for agriculture; and</p> <p>b) An agri-food network which includes infrastructure, services, and assets important to the viability of the agri-food sector.”</p> <p>What does “Consideration should be given to adding a “made in Halton” definition mean? What is wrong with this definition that needs to be addressed?</p> <p>TIMELINE & PUBLIC CONSULTATION PROCESS</p> <p>The timeline is not adequate to accommodate a complete review and communicate the issues back to the Region with time to resolve them before decisions are made; particularly given that BARAAC would need to review 4 separate discussion papers in order to understand all the policy impacts in Rural Burlington.</p> <p>There is no outlined opportunity for consultation between discussion paper and drafting of ROPA wording. As we learned in ROPA 38, 75 days for review of policy wording is not enough for Regional Council to have detailed understanding of policy issues before voting.</p> <p>It is not clear how discussion paper will lead to phase 3 and what, if any, role our input will have.</p> <p>A 161 Page Technical Background report is linked to the Discussion Paper through the Region’s website. It was created in April 2019, but it is the first time BARAAC has seen this report.</p> <p>Page 34 and 35 of the discussion paper include incomprehensible mapping including up to 37 “Areas for discussion” and “Areas for Discussion - Candidate areas”. There is no reference as to what is being discussed.</p> <p>The HRFA has previously submitted a paper on a review of ROPA 38 process and suggested improvements. No changes appear to have been made.</p> <p>The Halton Agricultural Advisory Committee was not involved in the review process or discussion paper. Given that this is supposed to be Regional Staff’s review and recommendation body for Agricultural policy in Halton, why not?</p> <p>PRIME AGRICULTURAL AREAS & NHS</p> <p>There are multiple places in this report and in the Region’s communications where Agricultural and Rural areas are presented as separate from the Region’s NHS. It is, for example, impossible for the “outcomes of the two topic areas” to have “close alignment” as their goals are primarily divergent. Recognition that the NHS is a constraint layer that restricts many Agricultural and Rural uses and makes public assets out</p>	<p>significant earth science area of natural and scientific interest. The Regional Official Plan also sets the criteria for the requirements of an Environmental Impact Assessment for proposed development and site alterations and identified opportunities for when an agricultural building would not trigger a study.</p> <p>Through consultation, there was support for the Region to update and enhance current policies to recognize agriculture in certain key natural heritage features and components of the Regional Natural Heritage System. This policy direction recommends that the Region explore additional opportunities for clarification on existing permissions for agricultural buildings and uses within the Regional Natural Heritage System within the existing policy framework and that is consistent with the Provincial Policy Statement, 2020 and conforms to Provincial Plans. This permission would be considered based on set criteria (i.e. size threshold) and would demonstrate no negative impact to the Regional Natural Heritage System. Outside of Key Features, there will continue to be permissions specifically for agriculture, agriculture-related, and on-farm diversified uses.</p> <p>Additional comments that are within the purview of the Regional Official Plan have the opportunity to be considered and explored ROPR progresses.</p> <p>It should also be noted that following receipt of the BARAAC proposal, the Region created an Agricultural Working Group to further identify issues and opportunities facing the agricultural sector in Halton. Several BARAAC members were represented on the Agricultural Working Group together with Halton Region Federation of Agriculture members. Staff along with AWG members worked together over 6 meetings. Modified mapping Option 2 was considered and explored by Regional staff however it was determined that the approach would not meet Provincial conformity and could not be advanced. Through discussions, a series of approaches that could be further explored to support the agricultural sector was developed and outlined in an Agricultural Working Group Summary report. The report was subsequently shared with the Halton Agricultural Advisory Committee and the Natural Heritage Advisory Committee for their comments. These are further reflected in the Consultation Summary report. These items will be further explored through Phase 3 of the ROPR.</p>

No.	Source	Submission	Response
		<p>of private land is fundamental in advancing a genuine planning discussion. Further, there should be recognition that it is landowners who have improved NH over time and not Halton's more rigorous mapping and policy. In fact, BARAAC would posit that it is likely that increased NH regulation is now and will continue to discourage landowners from enhancing NH. Finally, it is impossible to review and comment on the Rural and Agricultural discussion paper's goals to "support" Agriculture separate from the "constraint layer" presented in an entirely different document.</p> <p>Regional Council (Report No. LPS45-18) directed staff to "Provide for the agricultural system as a land use designation", and for "the natural heritage system as an overlay". However, the first discussion question is "Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?".</p> <p>The Province has allowed the fragmentation of Prime Agricultural Mapping by Key features (from the discussion paper: "In discussions with the Province, it was agreed that Key Natural Heritage Features of the NHS may be designated." The appropriate planning question is, should the ROP designate Key features. Given that not all the Key features should exclude agriculture (i.e. Earth Science ANSIs) and that not all the key features are accurately mapped (and further, that some may change over time). BARAAC recommends NOT designating Key Features.</p> <p>Requirements to protect key features of the Natural Heritage System based on the "no negative impact" principle should be implemented in a manner that better mitigates negative impacts to agricultural viability (i.e. land use constraints). Stewardship should be encouraged through additional measures that appropriately recognize the public benefits provided through on-farm protection and enhancement of the Natural Heritage System.</p> <p>Environmental Impact Assessment (EIA) requirements and guidelines for agricultural uses should be clarified in relation to Provincial policies. Examples/case studies of the types of issues being addressed through EIA requirements would clarify the intent and applicability of Regional policies. A cost/benefit analysis of implementation requirements for the Region, local municipalities and project proponents, is also recommended.</p> <p>MAPPING OF PRIME AGRICULTURAL AREAS</p> <p>The mapping section is confusing and it is not clear if it is being discussed for change or if the changes are to be discussed.</p> <p>A footnote refers to DBH Soil Services Inc being retained to assist in mapping review, but there does not seem to be reference to their actual report.</p> <p>Are the candidate areas still to be reviewed?</p> <p>From the discussion paper "Rationale is required by the Province for any particular area (prime) identified that is not brought into Regional mapping." Where is this rationale?</p> <p>One of the most urgent needs in this update is a granular understanding of how policies will be implemented ON THE GROUND. If the Region truly wants meaningful feedback, the public needs to be able to locate and delineate areas on properties. With all the Additional Resources provided online, why not include detailed mapping? For example: What are the differences between Provincial and Regional</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Mapping? What and where are the candidate areas? What is the actual increase in Prime Agricultural Area? Further, maps need not “look busy” digitally as layers can be applied or removed.</p> <p>AGRICULTURE-RELATED, ON FARM DIVERSIFIED AND AGRI-TOURISM USES</p> <p>The best way that Regional planning can support Agriculture (the only reason there is NHS to protect incidentally) and avoid deleterious unintended consequences, is to be as PERMISSIVE as possible in applying PPS policy, leaving necessary and justified constraints to local planning (as long as they are not more permissive than OMAFRA guidelines). In Burlington specifically, small, fractured, near-urban farming requires all of these diversification tools to remain viable.</p> <p>CEMETERIES</p> <p>The Region should be able to plan for cemeteries as part of the Urban planning, particularly the large commercial ones. Allowing smaller local ones in Rural designation, perhaps as an appropriate urban-rural buffer, is probably ok but not on Prime Agricultural land.</p> <p>EIA AND AIA GUIDELINES</p> <p>Environmental Impact Assessment Guidelines were updated mid-summer 2020 but have not been provided and are not discussed here (though they are touched on in the technical background report). Why?</p> <p>It would be best to make clear where an AIA will be required and most importantly where it will not. For example, a Surplus Farm Dwelling severance application would be considered “development” and could impact Agriculture but should not trigger an AIA. Requiring an AIA for smaller projects is counterproductive and tends to ensure only big projects are applied for. Small renewable energy and other additional on farm uses should be exempt.</p> <p>NORTH ALDERSHOT</p> <p>While there is some agriculture still taking place in the area the planning framework is very complicated. Given the timeline and lack of resources, BARAAC has not reviewed this discussion paper.</p> <p>REGIONAL NATURAL HERITAGE SYSTEM</p> <p>The discussion paper seems to make the conformity with the growth plan into a very complex issue. The reality is the complexity comes from trying to alter it to fit a Regional agenda that is proving to be unworkable in implementation. Using an overlay approach for NHS in the rural area (can be designations in Urban) is standard planning and is already done for Greenbelt NHS.</p> <p>There are 3 options presented for implementation. If they all implement the NHS as an overlay the main issue becomes which overlay. There is not enough information to evaluate this. It would depend on how similar the respective policies are. On the other hand, if as option 1 might be stating (and it is unclear in the other 2), the intent is to keep the RNHS as a designation with an additional NHS overlays this will cause problems for the rural area and adds needless complexity.</p> <p>The “precautionary principal” is introduced. This is not likely to work well for agriculture. There needs to be a more balanced approach and not just for agriculture but all normal rural uses. The precautionary</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>principal should not be explicitly included in the ROP. In all cases it is better to set out the required criteria in detail, so it is clear to all.</p> <p>Buffers and Vegetative Protection Zones are referenced along with a document produced by the Region. Quote “The Region has developed a working document called the “Framework for Regional Natural Heritage System Buffer Width Refinements for Area-Specific Planning””. This document has not been reviewed. There does not appear to be any advantage for the rural area in changes to the ROP for buffers accept as follows.</p> <p>Completely absent from the discussion papers is the concept of buffers on buffers. In the rural area it is not uncommon for a landowner to buffer a NH feature because they feel it is a good idea, as part of a conservation initiative, or as requirement through the regulatory process. Over time these buffers become incorporated in NH designation and the landowner finds themselves wanting to change something but now having to provide a new buffer from the old buffer. This should be included as an issue.</p> <p>Modified Option 2 Proposal</p> <p>As in Figure 10 (page 24) of the Region’s Rural and Agricultural Discussion Paper, Prime Agricultural Area is a designation, as are Rural areas. However, rather than Key Features being a designation, we apply a “made in Halton” approach, creating a subset of Key Features called Protected Areas. Protected Areas become a designation and are protected from ALL development activity, including Agricultural and Rural development activity.</p> <p>Key Features (in their entirety) are then included in NHS as an overlay; a single system where all NHS is equally important (a recognized problem with the original option 2 proposal).</p> <p>This modified option implements Agricultural and Rural designations that enable all provincially permitted uses except in Protected Areas, where the primary criteria is sensitive environment that should be excluded from normal agricultural and rural uses. Not all Key Features constrain or should constrain these normal uses. An example would be an Earth Science ANSI. In this option, Protected Areas would not include Earth Science ANSI’s, but could include, in contrast, provincially significant wetlands.</p> <p>The secondary criteria for inclusion as a Protected Area, would be that it is clearly delineated and mapped in a way that can be implemented. For example, Provincially Significant Wetland mapped by the Province could be included, while aerial photo interpretation of tableland woodlands might not be implementable.</p> <p>This option provides clarity surrounding permitted uses, keeping in mind those permitted uses are still constrained by Conservation Authority and the Niagara Escarpment Commission.</p> <p>Under this modified option, the NHS overlay, including Key Features, would protect the entire Rural area from more extensive development, i.e. those that require a Planning Act application. Under a Planning Act application an EIA and AIA can be required and those studies would delineate the NHS boundaries. It is important to note that: building permits are not development under the planning act, the Region’s policies on scoping and waiving EIA’s should remain, and that it would be appropriate to explicitly exempt some minor planning act applications such as a Minor Variance or Surplus Farm Dwelling Severance.</p> <p>This option would also propose the formation of a working group (such as HAAC, along with BARAAC and local planning staff) to create a “test” and review what should be included or excluded from the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Protected Areas; ie should be protected from permitted Agricultural and Rural uses and can be clearly delineated and mapped.</p> <p>In this way, a landowner would be able to access a map of their property that explicitly determined where they may engage in permitted uses, and where they may not. If a landowner wanted to develop outside of the scope of permitted uses, the NHS overlay would be fully fleshed out through the required studies.</p> <p>It is important to note that this option would allow the Municipality and Region to study, “capture” and protect (from non-Agricultural or Rural development) a more fulsome Natural Heritage System as it evolves, and on ALL properties in the rural area - rather than trying to delineate an NHS system that is temporally and geographically narrow.</p> <p>This modified option will also NEVER punish a landowner for their own stewardship as there is no potential to punish good behaviour (ie expanding woodlands) by constraining permitted uses on their own property - a MAJOR unintended consequence of unclear/undelineated mapping.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="662 258 1880 338">BARAAC Proposal: Prime Agricultural Area, Rural Area and Protected Areas are designated, with complete Natural Heritage System, including Key Features as overlay. Protected Areas are protected from all development and are clearly mapped and delineated, NHS protections are triggered by Planning Act Applications.</p> <p data-bbox="662 358 1880 399">Modified Option 2 Mapping Concept</p> <div data-bbox="662 409 1880 862">  <p data-bbox="662 489 1149 550">Natural Heritage System (including Key Features) (Overlay)</p> <p data-bbox="1181 469 1880 540">A complete Natural Heritage System overlay, including Key Features triggers development studies and protections for anything other than permitted Agricultural and Rural uses (i.e. cemeteries, golf courses etc).</p> <p data-bbox="662 651 1149 711">Protected Area (Designation)</p> <p data-bbox="1181 610 1880 671">Protected Areas are a designation and are protected from ALL development, including Rural and Agricultural development.</p> <p data-bbox="662 751 1149 832">Prime Agricultural Area (Designation) Rural (Designation)</p> <p data-bbox="1181 731 1880 792">Prime Agricultural and Rural Area designations with NHS as overlay meets Provincial Requirements and Regional Council Direction (report LPS45-18).</p> </div> <p data-bbox="662 883 1880 923">Modified Option 2 Problems Resolved</p> <div data-bbox="662 993 1880 1794">  <p data-bbox="926 1003 1165 1034">Map User Friendliness:</p> <ul data-bbox="1181 1003 1880 1437" style="list-style-type: none"> • Clear, delineated and mapped property designations with established data. Property owner understands exactly where they may engage in permitted uses, therefore fully implementable • Where Prime Agricultural Areas and NHS Key Features are not mutually exclusive, creating mapping chaos, Protected Areas and Prime Agricultural and Rural Areas would be mutually exclusive land use designations • Overlay protections and studies triggered upon Planning Act Application with some small exemptions (i.e. Minor Variance or Surplus Farm Dwelling Severance) • Mapped Protected Areas encourage stewardship; eliminate landowner fear that contributing to NHS may limit future property use • Identifies a complete NHS system with Key Features, Linkages, Enhancements and Buffers as a separate layer (eliminates the two tiers proposed in other options) <hr/> <p data-bbox="926 1457 1165 1487">Policy Application:</p> <ul data-bbox="1181 1457 1880 1794" style="list-style-type: none"> • Balanced and clear approach that protects both Agriculture and NHS as systems without cumbersome "prohibition with exemption" model. Protected Areas protected from ALL development • Not all Key Features constrain or should constrain Rural and Agricultural permitted uses. In this option, Protected Areas can exclude things like Earth Science ANSI's, but could include provincially significant wetlands • Protected Areas (determined by working group) provides a "Made in Halton" solution with Provincial Conformity as a necessary but secondary focus • Does not limit NHS geographically or temporally: Planning Act Applications require study of NHS (through EIA's and/or AIA's) on ALL rural/agricultural properties, therefore capturing any new or unknown environmental or agricultural public assets. </div>	<p data-bbox="1982 1155 2766 1215">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
4.	Kamaljit Sandhu/8316 Tenth Line	<p>Email dated 2020-10-19</p> <p>Hello Leilani, As discussed and noted in your email below, please find attached my response with supporting documents & pictures. Please acknowledge the receipt of my email and let me know when I could approximately hear back the decision from you. Thanks and regards, Tony Sandhu</p> <p>Attached per attached email</p> <p>Dear Ms. Lee-Yates Re: 8316 Tenth Line, Norval, ON – Natural Heritage Designation</p> <p>This letter is to follow up and provide the information discussed and noted in your email dated August 26th, 2020 regarding the proposed draft refinements to the natural heritage system affecting my property.</p> <p>Photographs have been attached, showing the present land features, with the <u>photo's location and direction</u>, as shown on the attached Natural Heritage plan copied from the Halton Regional Official Plan Review. Note: For this letter, Tenth Line is assumed to be N-S orientation.</p> <p>Picture #1: Standing South of the drainage ditch as shown in Region's plan, looking North – the ground surface, recently 'worked' by the farmer who has been maintaining and cropping the farmland for several years, demonstrates that the ditch does not exist as shown in the Region's plan location.</p> <p>Picture #2: Standing at the North property line, East of the farm pond, looking easterly along the property line shows the ditch located on my property, going from the pond to the rear lot lines of the houses fronting on the Tenth Line.</p> <p>Picture #3: Standing looking North along the rear lot line of the five private properties clearly shows the ditch's current location - which flows from North to South.</p> <p>Picture #4: Standing at the SW corner of the private property located along with the North limit of my property, shows the ditch following close to the property line, but on my property until it reaches the Halton Hills road ditch along the west side of Tenth Line.</p> <p>Picture #5: Standing looking West from Tenth Line road along the ditch. (Reverse direction to # 4)</p> <p>Picture #6: Standing West side of Tenth Line, in front of neighbor's property looking South where ditch enters roadside ditch. Blue arrow = Culvert location.</p> <p>Picture #7: Standing West of Tenth Line looking East at road culvert, which crosses the Tenth Line and flows East.</p> <p>I trust that I have demonstrated that the drainage ditch, which is the outlet from the farm pond located on my property and incorrectly shown on the Region's plans, is located as now demonstrated with the pictures. Please advise if more clarification is required.</p> <p>Based on the foregoing, I respectfully request that the Region's natural heritage system-mapping plan be corrected and changed, as noted in the photographs. Please provide the receipt of the final plan.</p> <p>Regards, Tony Sandhu Phone: 905-699-4466 Encl. Pictures referenced above.</p>	<p>Regional staff provided the landowner with a copy of the draft proposed mapping. The mapping refinement process as outlined in the Natural Heritage Discussion Paper includes incorporating any updates from GIS base layer data from the Province and Conservation Authorities, OMB decisions, approved planning applications, special Council Permits, and staff refinements based on in-field observations. The 'drainage ditch' as described by the landowner was identified as a regulated watercourse by the Credit Valley Conservation Authority (CVC). Regulated watercourses are mapped as a component of the Regional Natural Heritage System as per 115.4 of the Regional Official Plan. Since the watercourse has been identified by CVC, it will need to be confirmed by CVC that the watercourse is not regulated and CVC regulations mapping would need to be updated. Regional staff met with the landowner in August 2020 and provided this information. Regional staff directed the landowner to speak to CVC with regards to this matter. Additional correspondence has not been received that the watercourse is not regulated by CVC or that revisions to CVC's mapping have been made. Regional staff continues to support the RNHS policy framework and believe it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application in accordance with Policy 116.1 of the ROP. Detailed e-mail correspondence with the landowner can be made available upon request.</p> <p>Comments are acknowledged. Please see above for a detailed response.</p>



#1 Looking north across field



#2 Looking east from pond along property line

Comments are acknowledged. Please see above for a detailed response.



#3 Looking north along neighbour's property




#4 Looking east along neighbour's property

Comments are acknowledged. Please see above for a detailed response.



5 Looking west from 10th SR along neighbour's Property. #6 Looking south towards road culvert

Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
		 <p data-bbox="668 1719 1081 1755">#7 Looking east at Road culvert</p>	<p data-bbox="1982 1245 2769 1312">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
5.	Aki Tanaka	<p>Attached per email dated 2020-10-19</p> <p>Responses to Halton Regional Official Plan Review (ROPR) – General Questionnaire (ROPR) due by Oct. 30, 2020</p> <p>Aki Tanaka</p> <p>Natural Heritage</p> <p>Question 7 The current Regional Official Plan aims to protect approximately 50% of the total area of Halton for Natural Heritage. Is this an appropriate goal to maintain? Are there other ways to measure how effective we are at protecting the environment?</p> <p>Possible Answer</p> <p>Yes, protection of at least 50% of the land for Natural Heritage is an appropriate goal; it is important to protect as much land as possible to help mitigate the effect of climate change, and as humans we have the responsibility to preserve adequate space for wildlife to thrive. It would in fact be good to see an increase in protected lands in the urban areas, along with a decrease in the number of green builds. It would be wonderful to have some of the future green builds converted to protected areas, through purchase of said lands by the Region and a change of zoning before they are developed, especially if this could create a larger wildlife corridor through the residential areas. It would also be good to include additional restrictions on the land to protect key hydrological and mineral/aggregate areas in order to prevent future quarries, ground water bottling facilities and other environmentally invasive commercial operations. We also must protect land that is used by migrating animals and birds. For example the large field on Britannia Road has recently been prepared for housing – where will the geese land during their next migration?</p> <p>A study should be undertaken to measure the current level of biological diversity in our natural areas, and then use this level as a benchmark to maintain and improve upon. Another study which determines dollar value of our environmental assets would be beneficial as it could be used to defend their value.</p> <p>Question 8 Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?</p> <ul style="list-style-type: none"> - Policy and mapping considerations – choose the option which is the most restrictive in terms of protecting the Natural Systems. - Buffer and Vegetation Protection Zones – The Region should include detailed policies describing minimum standards for buffers and Vegetative Protection Zones in accordance to current buffer zone research. - Precautionary Principle – Precautionary Principle should be explicitly referenced in the ROP, both in the “Vision”, and throughout. - Natural Heritage Mapping – Environmentally Sensitive Areas must be specifically identified and guidance must be provided on their protection, maintenance and enhancement. Centres for Biodiversity should be identified, and policies pertaining specifically to their identification, protection, maintenance and enhancement should be created. Ensure that wildlife corridors are protected. 	<p>Rural and Agricultural System</p> <p>Policy Direction RAS-1 (also see NH-6) outlines proposed mapping and land designations and overlays. RAS-1 recommends the designation of prime agricultural areas, rural lands, and key natural heritage features with the remaining NHS as an overlay. Prime Agricultural Areas and Rural Lands designations will play an important role in addressing climate and building resilient communities as these land use designations recognize the value of land and soil in the Rural Area, and soils contribute to an ecosystem of nutrient recycling, carbon sequestration, climate regulation, and water filtration. Climate change policy directions provide additional direction about air quality (CC-2) and water quality (CC-8).</p> <p>Additionally, CC-7 supports locally-sourced food production and promotes urban agriculture opportunities in settlement areas. The Region’s Simply Local initiative also supports Halton’s agricultural community by promoting farms and agricultural businesses in Halton, including tourism, on an interactive online map that is accessible through the Region’s website. Simply Local creates an important connection between Halton residents and Halton farms and acts as a tool for residents in the Urban Area to connect with rural Halton.</p> <p>Policy Direction RAS-2 recommends updating the policies of the Regional Official Plan to broaden permissions and allow for more opportunities for agriculture-related uses and on-farm diversified uses as outlined in Provincial policies, plans, and guidelines. RAS-2 should primarily follow the direction of the Provincial Policy Statement, 2020, Growth Plan, Greenbelt Plan, and the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas for clear and consistent application of the policies. The recommendations to update policies will also allow local municipalities to provide more detailed policies through their respective official plans and zoning by-laws, as well as any additional tools to manage any on-farm diversified uses that have a high potential for impact.</p> <p>Climate Change</p> <p>The Climate Change Policy Direction (CC-5) provides a recommendation to introduce new policies in the Regional Official Pan that encourage the local municipalities to introduce and/or enhance Green Development Standards for new developments. Further policies directions aim to introduce a supportive policy framework for local energy planning (CC-6), require enhanced stormwater management planning to assess the impacts of extreme weather events and incorporate appropriate Green Infrastructure and Low Impact Development solutions (CC-5), require the Region and its local municipalities to assess infrastructure risk and vulnerabilities and</p>

No.	Source	Submission	Response
		<p>- Natural Heritage Strategy – Halton should develop a Natural Heritage Strategy as set out in section 7.1 of the Natural Heritage Discussion Paper.</p> <p>- Woodlots– include direction for removal of invasive species from natural areas, and replant woodlots where trees have died as a result of external stressors. Preserve the existing woodlots, and replant new woodlots (perhaps on converted employment lands or buy some of the greenbuild land back from developers) to restore some of the land to the condition that they were in times of pre-agriculture and development</p> <p>Rural and Agricultural System</p> <p>Question 10 Should agriculture-related uses and on-farm diversified use businesses be limited in size and scale in order to protect the agricultural land base?</p> <p>Answer No. We need to encourage agriculture related uses and on-farm diversified businesses that forward integrate and create more value with what is primarily produced on the farm. The more we forward integrate and create value with what we produce on the farm the more sustainable (profitable) primary ag production will become. This needs to be the goal so that we can compete with high volume primary production in the US wanting access to our domestic market here in Ontario and Canada, and as a result create our own sustainable safe food supply.</p> <p>Here are some really good examples... A 400 cow dairy operation wanting to vertically integrate into the yogurt processing business because they've isolated a protein profile in their herd that creates a more valuable/healthier yogurt. A goat milking operation wanting to vertically integrate into the Goat cheese business because they have created a cross bred goat type that produces a unique flavour and higher protein profile.</p> <p>Forward integration on the farm is what will decrease high volume factory farming that produces commodity product, and over time we will increase the sustainable healthiness of our food products. This transition will happen because forward integration is more profitable than primary commodity production. We will never be able to do away with commodity production agriculture, however we can decrease it by developing an alternative production system, on the farm, that creates more value for the consumer. The benefits of this approach are decreased carbon foot print in food production (less imports), improved profitability on the farm. Halton Region needs improved food security for the case where another pandemic happens or due to climate change, our food security is threatened. We need less dependency on food imports, and more food security.</p> <p>That being said the Region should provide strict guidance pertaining to preservation of soil quality and quantity, water quality, air quality in order to prevent long term negative impacts to land and to the community and environment at large.</p> <p>Question 11 Regarding the matters discussed here, do you have other suggestions that could help strengthen the vitality and resiliency of the agricultural sector?</p> <p>Answer It is of utmost importance for Halton Region to educate urbanites on the issues and opportunities facing farmers, food sovereignty. Halton should build a permanent market spaces in each municipality (like St</p>	<p>identify actions to address these challenges (CC-4), and other policy that integrates climate change considerations in the Regional Official Plan.</p> <p>Natural Heritage</p> <p>It should be noted that the approximate 50.6% of Halton Region that is protected through a natural Heritage designation is an evolutionary figure, which began when the Region introduced its first feature-based approach. In 1980, the Region introduced Environmentally Significant Areas, which protected approximately 13.4% of Halton Region. The 2006 ROP built on this strong foundation by further introducing comprehensive protection of natural features, called the Greenlands System, which was required through the 1997 Provincial Policy Statement. This system covered approximately 21.9% of Halton Region. The evolution of natural heritage protection continued through Sustainable Halton in 2009 (ROPA 38), which is a systems-based approach, established through technical background review. As such, 50.6% of Halton Region is now protected through a Natural Heritage System.</p> <p>Regional staff notes the following in regards to Aki Tanaka's responses to the Discussion Questions from the Natural Heritage Discussion Paper:</p> <p>The policy directions for Natural Heritage (i.e., NH1 to NH-11) were informed by feedback received from groups including the public, stakeholders, and agencies. Policy directions to address comments received include, but are not limited, to the following:</p> <ul style="list-style-type: none"> • a harmonized approach for the Provincial NHS mapping and policies; • excluding the NHS for the Growth Plan from settlement area boundaries in Halton; • maintaining the goals and objectives for the RNHS; • providing guidelines for clarification on how linkages, enhancements, and buffers are established; • address woodland quality in the determination of significant woodlands. • incorporating new policies and mapping to implement a Water Resource System; • updating policies to conform to the three Source Protection Plans that apply to Halton Region; • introducing a new section on Natural Hazards in the ROP to introduce policies that are consistent with the Provincial Policies and Plans and direct Local Municipalities to include policies and mapping in their Official Plans; <p>More fulsome details are available in the Policy Directions Report.</p>

No.	Source	Submission	Response
		<p>Lawrence market) so our farmers and small food producers will have a year round place to sell their products. Halton should also promote local produce purchasing, local farm tours and farm tourism.</p> <p>Halton Region is in a great position to create a vision for the integration of the consumer back into understanding the farm, and where their food comes from. Countries like France get it, they get where their food comes from and they seek out the unique value add for their dining – it would be great if we could encourage Halton residents to be as knowledgeable and grateful for their food. Farms are a big part of Halton and we should be proud of our farmers and fully support them through education of the urban citizenry.</p> <p>Climate Change</p> <p>Question 12 What do you think is the biggest climate change challenge for Halton to address through land-use planning in the next 20 years?</p> <p>Answer We need to ensure all future building adheres to LEED (or similar) building standards in order to reduce greenhouse gas emissions from the new housing required to house the future residents. We need to intensify our urban areas and stop building subdivisions. Halton must preserve (and even better increase) the current level of biological diversity and vegetation to help capture carbon, and reduce the effects of flooding and run off from increased and more severe weather activity.</p> <p>We must plan all future development areas on “green urbanism” design with a main street or central square for small businesses (rather than car centric shopping plazas), places for urban agriculture, social spaces, and a well-designed road system to make transit transportation efficient, along with dedicated bike and pedestrian lanes. Installation of LRT linking core areas, or dedicated bus lanes would make it public transit more efficient and convenient. Halton should incentivize residents to only purchase new build homes, and complete renovations that attain Passivhaus or LEED certification, and those that are built according to the Zero Carbon Building Standard. All greenfield builders should be mandated to incorporate a minimum percentage of natural greenspace in their plans. Within the greenspaces there should be a mix of native plants, and trees of at least 15 cm diameter in order to facilitate carbon capture.</p> <p>Question 13 What do you think the Region should do to help you reduce your carbon emissions? For example, if you typically commute by car to work or school every day, what would make you consider taking transit, biking or walking?</p> <p>Answer</p> <ul style="list-style-type: none"> - Build permanent indoor farmers markets accessible by transit - Install LRT linking communities - Free Transit for a week & a “no car challenge” - Segregated bike lanes. - Support electrification of transit and personal vehicles. - Widen sidewalks. - Create car-free zones. - Add charging stations for vehicles and e-bikes. - Provide incentives for building retrofits that meet LEED standards 	<p>North Aldershot</p> <p>The North Aldershot Policy Area policy directions (i.e., NAPA-1 and NAPA-2) provide recommendations for the planning framework in the North Aldershot area, including consideration for re-designating the lands to a Rural Lands designation, as well as ensuring that policies for urban servicing are aligned with updated Provincial policy direction. To note, existing, historical development approvals will be taken into consideration in the North Aldershot Policy Area. Additional consideration will be given to the protection of the natural heritage system and water resources, as well as financial viability.</p> <p>Integrated Growth Management Strategy</p> <p>Regional staff note that comments on the IGMS have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through the Preferred Growth Concept Submissions Chart and report anticipated to be available in early 2022. More details are also available in the IGMS policy directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> - Create connected active transit corridors that are safe for cyclists and walkers. Also make them easy to use, for example, walkways should have shade to protect people from the increasing temperatures in the summer. - Create spaces where people can gather outdoors <ul style="list-style-type: none"> o like European central squares. This will get people out of their homes, off tv's, out of malls and enjoying each others company rather than consuming. Ensure that they are accessible by transit. - Ban all plastic single use containers and drinking straws - Enforce the use of returnable/washable take out containers <p>North Aldershot Planning Area</p> <p>Question 14 Given the environmental and other provincial policy constraints, what are appropriate future land uses that should be permitted in the North Aldershot Planning Area?</p> <p>Answer Given that the area is 'protected' through the Greenbelt Plan, Niagara Escarpment Plan – no future residential development should be undertaken. Buy out Meridian Brick and restore the land to natural habitat.</p> <p>Question 15 Are there any additional considerations or trends that Halton Region should review in terms of the North Aldershot Review component of the Regional Official Plan Review?</p> <p>Answer Consider expanding existing parks to encourage trails and hiking.</p> <p>Integrated Growth Management Strategy</p> <p>Question 16 Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other potential strategic growth areas, should be the primary focus for new houses and apartments? Why?</p> <p>Answer All of these areas are suitable for intensification, but Urban Growth Centres and MTSA's should be the primary focus, with the exception of Burlington MTSA which has received an improper designation. This will allow attainment of the intensification targets and will create vibrant downtown cores for the cities of Halton. It will also help to facilitate use of transit rather than personal automobiles, which will decrease GHG emissions. We want people to choose public transit or walking/biking over cars, but people will always choose the most convenient form of transportation. Thus we need to ensure that public transportation is the most convenient option; this will occur if the intensification takes place close to the MTSA's.</p> <p>Question 17 As the Region plans to accommodate new growth, should it focus on intensification of existing built up areas or on expansion into agricultural and natural areas? What is an appropriate balance?</p> <p>Answer</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>We should focus solely on intensifying built up areas. Agricultural and natural areas must be preserved. We need to strive for compact, urban, Complete Communities. These should contain walkable mixed-use neighbourhoods that combine medium and high-density multi-family housing as well as green space and commercial areas. They should provide outdoor spaces where citizens can build relationships which develop community, stop dependence on automobiles, and include lots of space for native plant gardens and treed areas. With more and more people working from home they will demand increased access to outdoor space, local amenities and shops. These should be built in the Major Transit Station Areas, and Urban Growth Centres as we need to preserve as much greenspace as possible for agriculture and natural heritage. A minimum percentage vegetation cover should be implemented in the intensified areas. The neighbourhoods should be linked by transit (bus or LRT) which should be reachable by foot for the inhabitants. Bike share should be readily available within each neighbourhood.</p> <p>Why? Halton is now a collection of cities – we are no longer just “suburbs” of Toronto, and thus should aim to become smart, sustainable, well planned urban centres. We must stop allowing the development of car centric suburbs and move towards high density mixed use communities bordered by green spaces in order to mitigate and adapt to the effects of climate change.</p> <p>Question 18 How can the Regional Official Plan support a variety of mobility options to ensure integration of transportation and land use planning in growth areas?</p> <p>Answer It would have been better if the current suburbs were built on a grid network, or even on a transit corridor type plan, with rail or LRT connecting each hub. However, with the current sprawl it would be nice to have a dedicated bus lane, along with a dedicated and protected bike lane, connecting each area.</p> <p>Question 19 Are there opportunities for the Regional Official Plan to strengthen policies for ensuring adequate parks and open spaces near growth areas?</p> <p>Answer Yes certainly. Each growth area must have at least one accessible park area. At a very minimum each neighbourhood must have a wooded space, a community garden space, outdoor pavilions for picnicking, a natural water feature, a playground and a common area for people to gather. These lands could be obtained through conversion of current employment lands or under used commercial lands. It would also be helpful if the Province would restore the quid pro quo status of municipalities to negotiate with developers to include green spaces in new developments, and that the Municipality should have the job of designing the green spaces in consultation with the members of the community.</p> <p>Question 20 How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p> <p>Answer The employment landscape is evolving faster than the timeline of the ROP so the best approach is probably to develop liveable cities and increase commercial/restaurant venues to encourage Millennials and Gen Zers to settle in Halton. Flexible conversion of areas from Employment to Mixed Use depending on need (i.e. a Just In Time zoning policy), with allowances for micro manufacturing/factories within the urban area would be beneficial. We need to plan for distributive manufacturing involving green technologies to be able locate to close to consumers.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Question 21 Halton's Employment Areas are protected for employment uses such as manufacturing, warehousing, and offices. How should the Region balance protecting these Employment Areas with potential conversions to allow residential uses or a broader mix of uses?</p> <p>Possible Answer See answer to Question 20 above</p> <p>Question 22 The introduction of new sensitive land uses within or adjacent to Employment Areas could disrupt employment lands being used for a full range of business and/or industrial purposes. Are there other land use compatibility considerations that are important when considering where employment conversions should take place to protect existing and planned industry?</p> <p>Answer There is a feeling that if we juxtapose employment areas next to residential areas that this will only attract 'suitable' enterprises to come to the area. Do we really want a steel mill next door? Or, should we encourage a heavy industry facility to adopt enough sustainable processes to be safely situated near a neighbourhood? We do want to encourage small manufacturing, warehousing, office towers, commercial properties and 'clean' businesses to locate here.</p> <p>Question 23 Having appropriate separation distances between employment uses and sensitive land uses (residential, etc.) is important for ensuring land use compatibility. What should be considered when determining an appropriate separation distance?</p> <p>Answer Availability of public transit, bike lanes, and type of employment use should be considered. By creating buffers between employment lands and residences, we encourage vehicular traffic. Employees should be able to walk or take transit to work. No separation is required for major office employment or population related employment.</p> <p>Conclusion</p> <p>Question 24 Do you have any comments related to the proposed draft mapping available on the summary pages or in the Discussion Papers? The proposed draft maps for the Regional Natural Heritage System, Rural and Agricultural System and Major Transit Station Area Boundaries are located on the pages identified in the relevant Discussion papers.</p> <p>No</p> <p>Question 25 The Covid-19 Pandemic has had a number of short-term effects on the locations in which we work, shop, study and play. Are there any long-term implications for land use planning or growth management that should be considered through this phase of the Regional Official Plan Review?</p> <p>Answer</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>People have fully embraced outdoor activities such as biking, walking, and picnicking in parks and other natural spaces. As the population increases there will be increased pressure on existing natural spaces, especially within the urban areas, so it will be important to increase the size and/or number of natural spaces for people to enjoy.</p>	
6.	Nassagaweya Consultation Committee-Mitigation SubCommittee	<p>Email dated 2020-10-19</p> <p>Region of Halton</p> <p>Technical Questionnaire – Rural and Agricultural Discussion Paper</p> <p>1. Name: Nassagaweya Consultation Committee: Mitigation SubCommittee – members Farmers – Peter Lambrick, John Opsteen, Dr. Steve Noonan Citizens – Cindy Lunau, Sharon Barkley, Betty Robertson 2. Email: ej.robertson@sympatico.ca 3. Sign-up for notifications: yes 4. Phone: 905 299 1265 (cell) 5. Address: 13072 Guelph Line, RR1, Campbellville, ON L0P 1B0 6. Municipality of Interest – Milton</p> <p>Rural and Agricultural Discussion Paper</p> <p>Mapping Options</p> <p>For more information on this topic, please see pages 17-27 of the Rural and Agricultural System Discussion Paper</p> <p>1. Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</p> <p>Yes. This approach is consistent with provincial requirements, stresses the fact that prime agricultural land is a provincially protected resource, and will allow for greater clarity around permitted uses.</p> <p>2. Are there any additional pros and cons that could be identified for any of the options?</p> <p>The current Regional approach, #4 does not designate prime agricultural lands as required by province.</p> <p>The Region has indicated on Page 15 of the Discussion Paper that current methodology identifies prime agricultural areas a constraint on development. However, land use that does not fall within the definition of “development” is not necessarily being managed or restricted. As such, land can be taken out of agricultural use for on-farm businesses without the requirement of planning approvals. The current approach fails to meet the provincial goal of protecting prime agricultural areas for long term agricultural use.</p> <p>3. Do you have a preferred mapping option? If so, why?</p> <p>Option 2:</p> <ul style="list-style-type: none"> • Easy to read • Consistent with provincial land use designations 2 <ul style="list-style-type: none"> - Designates prime ag and key features, which are the two most highly protected land uses 	<p>The support of this submission for Mapping Option 2 and to designate prime agricultural areas in the Regional Official Plan directly aligns with the intent and recommendation put forward in Policy Direction RAS-1. RAS-1 (also see NH-6) recommends the designation of prime agricultural areas, rural lands, and key natural heritage features with the remaining NHS as an overlay and is reflective of Mapping Option 2 described in the Rural and Agricultural System Discussion Paper. The designations proposed in RAS-1 are intended to provide greater protection for the natural environment while preserving Halton’s valuable (and finite) agricultural land base.</p> <p>Comments supporting permissions for agriculture-related uses and on-farm diversified uses as outlined in Provincial Guidelines also align with Policy Direction RAS-2. RAS-2 recommends updating the policies of the Regional Official Plan to broaden permissions and allow for more opportunities for agriculture-related uses and on-farm diversified uses as outlined in Provincial policies, plans, and guidelines to further support Halton’s agricultural community. RAS-2 should primarily follow the direction of the Provincial Policy Statement, 2020, Growth Plan, Greenbelt Plan, and the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas for clear and consistent application of the policies. The recommendations to update policies will also allow local municipalities to provide more detailed policies and/or restrictions through their respective planning tools to manage any on-farm diversified uses that have a high potential for impact. Regional staff acknowledges support for having criteria for uses to meet the requirements of agriculture-related uses and recommendations on the scale of on-farm diversified uses proposed by the Nassagaweya Consultation Committee-Mitigation SubCommittee. Staff also acknowledge the proposed conditions and restrictions for agriculture-related uses and on-farm diversified uses, as well as recognize the concerns regarding wineries, microbreweries, and cannabis tasting rooms as permitted on-farm diversified uses. These comments about agriculture-related uses and on-farm diversified uses and RAS-2 have the opportunity to be considered and explored as the ROPR progresses, in particular, during the policy formulation stage.</p> <p>Comments regarding the location to permit cemeteries are reflective of Policy Direction RAS-3. RAS-3 outlines the recommended approach for permitting cemeteries within the proposed Rural Lands designation within the Rural Area. Subcommittee comments on cemeteries align with other consultation comments which revealed preference for cemeteries to be directed to settlement areas, with suggestions regarding cemeteries being permitted on rural lands to meet unmet demands, support complete communities, and satisfy other criteria. It</p>

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		<p>- Highlights rural lands separately which is not done on current mapping. This will assist in identifying the additional uses permitted on rural lands</p> <p>Second choice #1, third choice #3, last choice #4</p> <p>Agriculture-related uses</p> <p>For more information on this topic, please see pages 38-43 of the Rural and Agricultural System Discussion Paper.</p> <p>4. Should the ROP permit the agriculture-related uses as outlined in the Guideline on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety?</p> <p>Yes, for the most part. By adopting the approach in the Guidelines, we are adding clarity around what uses are permitted. The approval or rejection of development proposals can be supported by the provisions of the provincial policy and plans and Guidelines and there is less chance of confusion and appeals. It would also provide a greater number of economic opportunities for the rural community.</p> <p>The Region needs to lay out criteria to ensure these types of uses meet the requirements listed on bottom of page 41 of the Rural and Agricultural System Discussion Paper. As an example, products processed by an agriculture-related business must be obtained primarily from farm or surrounding local agricultural area (i.e. 75% minimum of local sourced product for Niagara-on-the-Lake).</p> <p>5. What additional conditions or restrictions should be required for any agriculture-related uses?</p> <ul style="list-style-type: none"> - Per PPS2020 and the provincial Guidelines, agriculture-related uses are not required to be on a farm and are not required to be carried out by a farmer. These are operations that benefit the local agricultural community and are not tied to diversification of a particular farm operation. - Stand-alone agriculture-related uses are better located on regional roads and/or in close proximity to settlements. - Greater clarity around the definition and categorization of uses. Since agricultural uses and the nuisances related to normal farm practices are heavily protected in Ontario, it is important that the Region clarifies what is an agricultural use and what is not. Nuisances related to activities that are not considered agriculture should be treated in ways consistent with nuisances in the urban area. The provincial Guidelines define agriculture to be commercial agriculture whereas the Region's definition has no commercial requirement. A recent decision by the Normal Farm Practices Protection Board stated that the nuisances related to activities on a hobby farm where there was no commercial component were not protected as normal farm practices (Fryer v. Cooper, 2019 CanLII 96549). These activities were not considered agriculture. The provincial Guidelines define value-retaining processing to be an agriculture use and this is also supported by definition of agriculture in the Farming and Food Protection Act. Value-added processing on a 3 farm is either an agriculture-related use or on-farm diversified use. Value-added processing should not be treated as an agricultural use. - Consistent categorization of the processing of cannabis oil and edibles. The Town of Milton has indicated that such uses are agricultural uses. The rationale provided by the Town was essentially that this is the historical approach to processing located on farms. Halton Hills has classified these 	<p>was also recommended that details such as cemetery size be determined by local municipalities. Additionally, there was broad support from consultation to restrict cemeteries in prime agricultural areas as these areas are a valuable and finite resource, consistent with comments received by the subcommittee.</p> <p>The subcommittee's feedback regarding AIA specifications in the Regional Official Plan align with the direction outlined in RAS-4. Policy Direction RAS-4 recommends that policies provide greater specificity for when an Agricultural Impact Assessment is required in accordance with Provincial plans and policies: settlement area boundary expansions, new or expanding mineral aggregate operations, infrastructure in the rural area, and any proposed development that removes land from Prime Agricultural Areas. RAS-4 is also recommended that the Regional Official Plan continue to reference Regional Agricultural Impact Assessment Guidelines and review the Guidelines for consistency per any updates to Provincial guidance documents. Additionally, concerns regarding sufficient protection of agricultural operations along the urban-rural fringe by existing AIA requirements have the opportunity to be addressed through Policy Direction RAS-7 which focuses on edge planning.</p> <p>Additional comments received from the Nassagaweya Consultation Committee-Mitigation SubCommittee that are within the purview of the Regional Official Plan have the opportunity to be considered and explored as the ROPR progresses, in particular, during the policy formulation stage; other comments and concerns may be addressed by other departments within the Region or more broadly at the corporate level.</p>

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		<p>uses as agriculture-related uses. Provincial Guidelines, the NEC letter to Halton Hills and the Planning Consultants for the two municipalities categorized these uses as agriculture-related uses. Since this type of processing cannot result in significant nuisance, it is important to distinguish which uses are protected as normal farm practices and which are not.</p> <ul style="list-style-type: none"> - Development of compatibility criteria to meet the requirement “shall be compatible with and not hinder surrounding agricultural operations”. The provincial Guidelines lays out compatibility considerations for agriculture-related uses on pages 12-13 and references mitigation strategies in Sections 3.1.3 and 3.2.4 of the Guidelines. - Clarity that the requirement to be “compatible with and not hinder surrounding agricultural operations” adds an additional hurdle for agriculture-related uses (and on-farm diversified uses) and does not negate the need to meet MOE requirements and other municipal by-laws. This was confirmed by the Region in the September 2020 open house - Considering expanding the area to be serviced (beyond the immediately surrounding agricultural area) to attract operations that can service our local area and a wider agricultural community (i.e. Elmira Produce Auction Cooperative). Whether located in the employment lands or rural area depends on the level of adverse impacts. - Determination of criteria (types of use, scale, water usage, traffic) that would require an operation to be relocated to a settlement area - Clarification of when a site plan, AIA or additional planning approvals are needed. - The Regional Guidelines for On-Farm Businesses needs to be updated to reflect the changed definitions and criteria. <p>On-farm Diversified Uses</p> <p>For more information on this topic, please see pages 44-48 of the Rural and Agricultural System Discussion Paper.</p> <p>6. The Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas limit on-farm diversified uses to no more than 2 per cent of the farm property on which the uses are located to a maximum of 1 hectare. As well, the gross floor area of buildings used for on-farm diversified uses is limited (e.g., 20 per cent of the 2 per cent). Are these the appropriate size limitations for Halton farms?</p> <p>Overview</p> <p>We understand the importance of the Region’s continued support of the existing agri-tourism operations and the Regional goal of developing signature agri-tourism operations. The Mitigation Subcommittee’s approach is to not suggest a use be prohibited but to encourage the application of mitigating measures.</p> <p>The Region’s most successful agri-tourism operations do not meet the 2% lot coverage rule for cumulative on-farm diversified uses. This coverage is often multiples of what is permitted and is driven by the size of parking lots and activity areas. For example, Springridge Farms’ on-farm diversified uses are over 6X what is permitted under the 2% lot coverage ratio and exceed the maximum square footage for buildings (NEC Planning Memo dated November 28, 2018).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>We suggest the Region place emphasis on minimizing and mitigation of off-site impacts and restricting high impact activities. High-impact activities such as festivals and music concerts can significantly drive volume and should be allowed sparingly, especially by operations that already exceed scale criteria. These larger operations should be required to mitigate issues related to traffic and proximity to neighbouring properties. Operations that involve high impact activities (weddings, amplification, motorized activities, etc.) should be smaller in scale and restricted in the number of events, maximum attendees, and seasonality.</p> <p>In addition, the cumulative impact of multiple agriculture-related and on-farm diversified uses in the Region's countryside should be limited and not undermine the agricultural nature of the area. This relates to the types of uses and their proximity.</p> <p>This will balance the need to maintain the agricultural/rural character of the area while supporting larger-scale operations. Some of the provincial goals will not be met but, at minimum, the impact on the surrounding community can be minimized.</p> <p>Objectives of the Scale Criteria</p> <p>For most of the Agricultural Lands within Halton, which fall within the Niagara Escarpment and Greenbelt Plan Area, the provincial plans are looking for the 2% lot coverage to be applied. The NEP has a 2% lot coverage cap specified. The Greenbelt Plan requires the provincial Guidelines to be applied for on-farm diversified uses and the Guidelines recommend using the lot coverage ratio.</p> <p>To ignore this approach, Halton Region should be coming up with alternative criteria that meets the temporal and spacial objectives for cumulative on-farm diversified uses set out in the Guidelines and highlighted in the Discussion Paper (Page 47):</p> <ul style="list-style-type: none"> • minimize the amount of land taken out of agricultural production • to ensure that agriculture remains the main land use in prime agricultural areas and • to limit off-site impacts to ensure compatibility with surrounding agriculture operations <p>Currently, there are no criteria within the ROP to ensure</p> <ul style="list-style-type: none"> • the cumulative scale of on-farm diversified uses is limited • the amount of land taken out of active agricultural production is limited • the impact on the surrounding agricultural operations is considered <p>The ROP requires certain uses to be secondary but does not specify the criteria to determine how this requirement of secondary is met.</p> <p>At a minimum, the off-side impacts of uses that do not meet the provincial criteria should be avoided, minimized or mitigated.</p> <p>Non-Agricultural Uses</p> <p>The provincial Guidelines specify that cumulative on-farm diversified uses that do not meet the scale limits are not supported and would be considered non-agricultural uses. Non-agricultural uses are not</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>permitted within the prime agricultural uses within the Greenbelt Plan and in other areas, such uses require additional planning approvals.</p> <p>Again, at a minimum, the impact of these uses should be mitigated.</p> <p>Recommendation We understand that the Region and municipalities may come up with a different approach. We recommend the following as a way of permitting a wider range of operations while managing the level of adverse impacts:</p> <p>A. Separating on-farm diversified uses into three categories. Small scale operations (meet 2% lot coverage requirement and not focused on high impact activities); those involving high impact activities; and large-scale operations (above 2% coverage). Additional constraints are placed on operations with high impact activities and large-scale operations. As a general rule, any agritourism operation can host a limited number of events subject to a permitting process. The number of events, if any, permitted is dependent on the size of the events, the ability to mitigate off-site impacts, the ability to meet municipal permitting requirements and to demonstrate compliance in the prior year(s). Exemptions from municipal by-laws such as the noise by-law should be granted sparingly, if at all.</p> <p>B. Due to the highly residential nature of the Halton countryside, we do not support operations focused on high impact activities, including event venues. The Region’s suggestion that such outdoor venues could be allowed and then monitored through a complaint process is very much the “ask for forgiveness, not permission” approach. With the limited municipal enforcement resources available, particularly on weekends, ensuring compliance would be difficult and the conflict ends up being between the Town and the complainant. We do not believe these types of outdoor operations or this approach would be permitted in the mixed-use sections of the urban areas.</p> <p>In the event the Region does decide to permit high impact activities, such as seasonal event venues, they should be subject to certain limitations, including:</p> <ol style="list-style-type: none"> a. smaller in scale (2% lot coverage ratio and maximum building size, i.e. 350m²). Such sizing can be found in other jurisdictions. b. seasonal c. maximum number of events established. The number of events permitted in other jurisdictions varies but is generally 20 to 26 events in a calendar year for an event venue. This is evidenced by site specific requirements in the Niagara Region to OMB cases such as Burl’s Creek (PL151011), and Mathias’ wedding venue (PL170178). d. maximum number of attendees permitted e. hours of operations established f. subject to additional planning approvals including zoning by-law amendment, site plan control, annual permits g. approvals are dependent on ability to demonstrate that off-site impacts will be sufficiently mitigated. For example, a noise management plan ensures the operation 6 meet standards or the municipal noise by-law. Georgetown requires recognition that the rural area is considered residential for noise if residential is a permitted land use. Noise standards for the venue, if set be a municipality, should consider noise levels at the edge of the venue property so by-law officers and venue operators can manage noise levels without 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>questioning the viability of the complaint. Recognition that noise caused by amplification is not considered a stationary source as covered by the MOE noise limits.</p> <ul style="list-style-type: none"> h. Limitation on the number of operations with high impact activities within a certain radius. i. adequate parking on site. Cannot depend on busing or off-site parking to increase the capacity. j. issuance of an annual licence subject to complaints, if any. No exemptions to the noise by-law should be provided. <p>C. Cumulative on-farm diversified operations above a certain size, including lot coverage, should require:</p> <ul style="list-style-type: none"> a. Site plan approval ensuring appropriate siting on the lot, entrances, setbacks, screening and siting of all land used. b. Criteria still needed to determine if the cumulative on-farm diversified use is secondary to the principle agricultural use on the property. Given that the province is proposing a maximum 2% land use, simply requiring that that the land used for on-farm diversified use is less than the land used for agricultural use on a property would likely be inadequate as a criteria. It would also be difficult to argue that such a large on-farm diversified operation is not adversely impacting the agricultural operation on the property, as required by the requirement to “be compatible with and not adversely impact agricultural operations in the area”. c. Greater restriction on the type of activities and the number and type of events: <ul style="list-style-type: none"> i. Special events are limited in number and related to agriculture on the property (i.e. annual agricultural festivals). Events are required to go through the municipality’s permitting process and can be withheld if complaints are received and/or issues not resolved. ii. High impact activities are prohibited other than those conducted as part of the limited number of events discussed above. Events like corporate events, weddings and music concerts are not permitted. These types of activities tend to drive the volume of visitors and result in numerous negative off-site impacts. Since the operation already exceeds the provincial limit, activities that would further drive traffic, congestion, noise, and light pollution, should be avoided. <p>D. Floor area should include all temporary, seasonal and permanent structures and buildings</p> <p>E. Land area should include the area of existing and new buildings and structures, parking and any other areas of the lot used primarily for the on-farm diversified businesses, excluding existing driveways shared with a permitted principal use on the lot and areas that produce a harvestable crop.</p> <p>F. Any increase in land and/or buildings and structures for high impact and large-scale operations require further approval by the municipality. 7</p> <p>G. Since we are permitting larger scale operations, we should eliminate current practices used to rationalize these operations:</p> <ul style="list-style-type: none"> a. categorizing on-farm diversified uses as either agricultural uses or agriculture-related uses. For example, the Town of Milton categorized Springridge Farm’s on-farm diversified uses as agriculture uses, “No objections were identified on the basis that the uses were understood to be agricultural.” b. categorizing unsurfaced areas as land that remain “available for agriculture” and excluded from the 2% lot coverage. This approach decreases the amount of crops grown and interrupts and degrades the use of pasture for summer grazing of livestock. The provincial goal is to keep land actively in agriculture for the long term, not passively in an indefinite state of “available for agriculture”. Per, the Guidelines, taking land and/or buildings out of 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>agricultural use for on-farm diversified use is okay as long as the use is temporary (i.e. short term for an event) and is put back into active agricultural use immediately afterwards. Within the Guidelines, agricultural use is considered active commercial agricultural use. Leaving agricultural land as parking or activity areas indefinitely is not considered agricultural use. Such land would be included in the 2% coverage scale limit under the provincial Guidelines.</p> <p>Lochland Botanicals</p> <p>As an example, Lochland Botanicals, a new pick-your-own agri-tourism operation located in north Milton, owned by Dr. Diane Corlett and Dr. Steve Noonan, would like to hold events. Dianne would like to host small-scale weddings in a tent beside the fields of flowers. Steve loves music and would like to an outdoor concerts in a back field after the hay season with approximately 250 attendees and occasional concerts on the second floor of the barn. They would like to also hold festivals for their flower and herb farm. As Lochland Botanicals is still small scale, there are a lot of options. They can host a variety of different events. All events would require special events permits obtained from the Town of Milton. The music concert in the back field may involve a noise exemption and may reduce the number of events that Lochland Botanicals can host for a season. Weddings in a tent and music concerts in the barn would require noise management plans to ensure noise levels will meet the Town’s noise by-laws. The total square footage used for all on-farm diversified activities would need to be considered.</p> <p>If the total number of events goes over the level of what would be considered occasional (say 8 to 10 calendar days per season), the operation would be required to apply to become an event venue and the scale of all on-farm diversified activities would be restricted (buildings, structures and land). Additional planning approvals such as a ZBLA would be required.</p> <p>If the popularity of the agri-tourism operation requires growth such that they become “large-scale”, Lochland Botanicals would require additional planning approvals such as site plan control and be restricted in the types of events to those directly related to agricultural use on the property.</p> <p>The weddings and music concerts would no longer be permitted. The number of events permitted by the Town under any scenario may be further reduced if the Terre Bleu Lavender Farm, a neighbour, decides to also hold events.</p> <p>7. Should the Regional Official Plan permit on-farm diversified uses as outlined in the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas in its entirety?</p> <p>Yes with a couple of exceptions. This provides for consistency and clarity on what types uses are permissible. It also greatly expands the types of activities permitted.</p> <p>The exceptions:</p> <ul style="list-style-type: none"> • Operations that use more land or building size than what is permitted in the provincial Guidelines are subject to additional restrictions and planning approvals as provided for in #6 above. • Operations that have high impact activities are subject to additional restrictions and planning approvals as provided for in #6 above • Wineries and microbreweries should not be permitted at this time without additional planning approvals and development of best practices as established in Niagara Region. This ensures that 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>a minimum of the agricultural product is sourced from the farm and surrounding agricultural area and provides rules around licensed premises in the rural area</p> <ul style="list-style-type: none"> • Cannabis tasting rooms should not be permitted at this time without additional planning approvals and development of best practices. <p>8. What additional conditions or restrictions should be required for any on-farm diversified uses?</p> <ul style="list-style-type: none"> • On the top of Page 42 of the Rural and Agricultural System Discussion Paper, it states that Section 3.1.3.1 of the Greenbelt Plan permits agriculture-related uses with specific reference to the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas. The reference to the provincial Guidelines also applies to on-farm diversified uses. • Provincial policy, plans, guidelines and LPAT decisions support on-farm diversified activities on properties that are commercially farmed. There is no requirement that a farmer be involved or that the use be part of a farm operation. • Where possible, there should be consistency in the application of criteria across different types of on-farm diversified uses. For example, the application of traffic limits should be applied consistently for all on-farm diversified uses; a small daycare should not be closed down due to excessive traffic while an agri-tourism operation is permitted with increases in hundreds of cars per hour. • On-farm diversified uses, as a general rule, should not interfere with the enjoyment and privacy of neighbouring uses for the following reasons: <ul style="list-style-type: none"> i. These uses are not protected as normal farm practices. The requirement to be compatible and not hinder surrounding agricultural operations adds an additional hurdle and does not negate the need to comply with MOE requirements and municipal by-laws. ii. This requirement is consistent with Burlington and Halton Hills Official Plans iii. This requirement recognizes the heavily residential nature of the Halton countryside iv. The impact of high intensity uses should be required to meet the same level of oversight as uses in the urban area. 9 v. This is consistent with the response on September 17, 2020 given by Regional Planning regarding the liveability of the rural countryside • A limited number of agri-tourism events, such as an annual festival celebrating the agricultural use on the farm, may be held each year subject to the approval and issuance of an event permit by the Town. The events must comply with all municipal requirements. Events represent an occasional activity. Events that are considered to be large-scale, events that are recurring or events that are permanent in nature should be prohibited. The Town may decline to issue a permit where the event fails to meet the requirements under this Plan or other requirements set by the by the Town or the applicant has failed to comply with any event requirements in the past. • Development of compatibility criteria to meet the requirement “shall be compatible with and not hinder surrounding agricultural operations”. The provincial Guidelines lays out compatibility considerations for agriculture-related uses on pages 12-13 and references mitigation strategies in Sections 3.1.3 and 3.2.4 of the Guidelines. • Clarity that the requirement to be “compatible with and not hinder surrounding agricultural operations” adds an additional hurdle for agriculture-related uses (and on-farm diversified uses) and does not negate the need to meet MOE requirements and other municipal by-laws. This was confirmed by the Region in the September 2020 open house 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>9. Should the Regional Official Plan permit on-farm diversified uses as outlined in the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety?</p> <p>See answer for number 7</p> <p>Cemeteries</p> <p>10. To what extent should the updated Regional Official Plan permit cemeteries in:</p> <ul style="list-style-type: none"> • Urban areas • Rural areas • Prime agricultural areas <p>Explain the criteria (e.g., factors) that are important to you and should be considered when evaluating cemetery applications for each?</p> <p>For more information on this topic, please see pages 49-53 of the Rural and Agricultural System Discussion Paper.</p> <p>We believe that cemeteries should be a permitted use within urban areas and on rural lands as per provincial policy and plans. In the NEC, cemeteries should be limited to meeting the needs of the surrounding community. Urban cemeteries will likely meet the needs of the surrounding community 10 whereas new cemeteries on rural lands will likely meet the needs of urban populations not living in the immediate community.</p> <p>Cemeteries should not be a permitted use within prime agricultural lands of the NEC and Greenbelt as such institutional uses are prohibited under the respective plans. These plans supersede PPS2020 when more restrictive. Outside of the NEC and Greenbelt, most prime agricultural land in Milton will be subject to development over the long term. As such, we support cemeteries if they can meet the criteria outlined on Page 52-53 for such prime agricultural areas.</p> <p>NEP reference: 1.4.3. 12. Only permits institutional uses outside of prime agricultural lands. Must also be focused on meeting needs of immediate community.</p> <p>Greenbelt Plan reference: 4.1.1.1 Non-agricultural uses are not permitted in prime agricultural areas except in very limited circumstances. New cemeteries are not one of these circumstances. Non-agricultural uses may be permitted on rural lands if certain conditions are met.</p> <p>As mentioned, new rural cemeteries will primarily meet the needs of urban communities unrelated to the immediate community. The question becomes how these facilities can meet the needs of the surrounding community. Having cemeteries developed and open to the public as a park space (benches, walkways, jogging, spiritual space, dog park) could help fulfill this role. Keeping and enhancing natural heritage elements and having adequate setbacks and screening can support compatibility with surrounding land uses. Keeping spaces natural and avoiding expansive lawn areas that require extensive watering and chemicals will support the rural environment and water quality and quantity.</p> <p>As part of the application, the municipality should ensure there are no adverse environmental impacts; natural heritage elements are maintained and protected; cemetery accessory uses are designed and located to minimize impact on adjacent land use and the rural open landscape character; and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>crematoriums, funeral homes, restaurants, banquet halls and conference facilities are not permitted as part of the cemetery. In addition, benefits to the local community should be assessed.</p> <p>11. Do the Agricultural Impact Assessment policy requirements in the ROP sufficiently protect agricultural operations in the Prime Agricultural Area and Rural Area?</p> <p>If not, what additional requirements do you think are needed? For more information on this topic, please see pages 55-57 of the Rural and Agricultural System Discussion Paper.</p> <p>We do not believe the AIA policy requirements in the ROP sufficiently protect agricultural operations, particularly on the urban/rural fringe. We believe that AIAs should incorporate elements of fringe planning including:</p> <ul style="list-style-type: none"> • Establishing a buffer area between land protected via provincial plan and settlement areas. Buffers need to be established exists on both sides of the urban/rural divide and impacts future development on both sides. • Subjecting all development on land within the buffer area to design criteria for fringe development: <ol style="list-style-type: none"> 1. Utilization of design measures to mitigate conflicts between urban and rural uses. These measures may include such things as restriction in permitted uses, 11 subdivision layout, site layout, and the incorporation of buffers such as treed landscape strips or public pathways. 2. Development agreements to be registered on lands at the Rural- Urban Interface shall clearly identify that agricultural operations are ongoing in the area, beyond the City's municipal boundary, and that these agricultural practices may result in noise, odours, dust and other potential nuisances resulting from normal farm practices. 3. MDS/AIAs 4. consider mitigation techniques for the Rural Area: buffer planting, restricted new livestock use within periphery 5. education about normal farm practices <p>In addition, we believe the Region should develop a Regional Guideline related to Edge Planning.</p> <p>12. Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?</p> <p>For more information on this topic, please see pages 55-57 of the Rural and Agricultural System Discussion Paper.</p> <p>The conditions for triggering an AIA should be specified where possible in the Official Plan to give teeth to the requirement for these assessments. This includes large scale uses in rural lands.</p> <p>The ROP should still include a general policy (ROP 101(2)) that requires an AIA for non-farm land uses that have the potential to impact adjacent agricultural operations. This will encourage all applications to keep this in mind.</p> <p>13. Should special needs housing be permitted outside of urban areas and under what conditions?</p> <p>For more information on this topic, please see pages 59-61 of the Rural and Agricultural System Discussion Paper.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>No comment</p> <p>14. Are there any additional considerations or trends that Halton Region should review in terms of the Rural and Agricultural System component of the Regional Official Plan Review?</p> <p>There are many planning tools, by-laws and provincial regulations to encourage economic prosperity while protecting the health and well being of residents. We feel the Region and municipalities are less consistent in their approach to the rural area and less rigorous in its controls over adverse impacts of commercial and industrial uses than in the urban area. We understand that the ROP is out of date and the Region has had to adapt its interpretations to allow for opportunities in the rural area but bending the rules often ends up being to the detriment of rural residents. These practices include incorrect 12 characterization of uses to support less restrictions and oversight and ignoring the more restrictive provisions of provincial plans.</p> <p>We seek parity in the approaches taken in the urban area including ways in which economic activity promoted and balanced with liveability. Would the Region intentionally reduce the environmental protections afforded urban residents for industrial processing? Would the Region exempt a high intensity commercial use in the urban area from site plan control? The Town of Milton talks of greater integration between urban and rural approaches. Protection of the health, well-being and liveability for all residents is a good place to start.</p> <p>Our comments below are directed towards adding clarity, consistency and balance to land use planning in the rural area.</p> <ul style="list-style-type: none"> • Protecting prime agricultural lands. In the first section we talked about the provincial need to designate prime agricultural lands. Once we do that, PPS2020 requires that we have to protect these lands. The provincial policy goal states in section 2.3.1 of PPS2020 “prime agricultural areas shall be protected for long term use for agriculture”. To support large-scale agri-tourism ventures, the Region will not protect agricultural land to the level provided for in PPS2020 and the provincial Guidelines. This should be acknowledged. The rural community should not have to deal with adverse impacts of commercial operations that are not supported provincially. At a minimum, the ROP should take steps to minimize and mitigate the adverse impacts of such operations. • Where the Region has no intention of conforming to provincial plans, such as the Greenbelt Plan, to acknowledge this in the drafting process and to provide for alternative means to achieve the same results. For example, it seems that certain aspects of the Greenbelt Plan will be ignored including: <ul style="list-style-type: none"> i. Requirements that agricultural uses, agriculture-related uses and on-farm diversified uses in the protected countryside be based on the provincial Guidelines; and ii. The additional restrictions placed on “non-agricultural uses” in prime agricultural areas of the protected countryside of the Greenbelt. PPS2020 allows non-agricultural uses on prime agricultural lands if certain conditions are met. A similar provision is found in the Greenbelt Plan but only for such uses on rural lands. • Acknowledging that liveability is essential to all residents throughout Milton. We understand that nuisances related to normal farm practices are protected. This need for liveability was confirmed by Regional Planning in the open house on September 17, 2020. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Recognizing the heavily residential nature of the rural countryside and recognizing that the Region has the option to adjust planning policies accordingly. In many Regional reports there is no mention of the residential community living in the countryside. Just as PPS2020 provides for municipal flexibility in the approaches it takes, it also provides for municipalities to tailor approaches to the specific circumstances within their municipality. In discussions with Helma Geerts, a land use planner at OMAFRA, it came to light that she was a planner at Halton Region 13 and she recognized the heavily residential nature of our countryside. She indicated that the Region and municipalities are justified in placing further restrictions to provide for this quality of our community. PPS2020 states “Within the framework of the provincial policy-led planning system, planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policy of the Provincial Policy Statement.” Halton Hills has made efforts to recognize the residential nature of the countryside by requiring “the use shall not have a negative impact on the enjoyment and privacy of neighbouring properties”; • Applying rules consistently throughout the rural and urban areas where possible. For example, if commercial business requires a site plan in the urban area, apply the same principles to rural businesses. This requirement may be applied based on scale or potential for adverse impacts. • Provide greater clarity on classification of uses. This will limit the opportunity to “reclassify” uses so adverse impacts are not addressed and required planning approvals are not obtained. Priority should be to be consistent with provincial policy, plans and legislation rather than historical approaches. The practice of misclassifying uses to circumvent planning processes should be discouraged. • Greater permitted uses. We would like to maximize the opportunities available for everyone in the entire rural community to prosper economically within the context of provincial policy and plans. This includes: <ul style="list-style-type: none"> i. Greater flexibility for business uses within the hamlets ii. Greater opportunities for alternative housing including secondary units throughout the rural area. In settlements, located within principle residence; on rural and prime ag lands located within the principle residence or in an ancillary building. Conditional on available services (water, septic, parking, etc.). Opportunity for garden suites where services are available (municipal or private) iii. Clarification on where vacation properties are permitted. Current wording in Milton OPA31 permits vacation rentals on farm properties only. Does that mean vacation rentals are not permitted on other lands in the rural and urban areas? iv. Additional uses within the rural lands. These uses are not required to be on a farm nor carried out by a farmer. This is referred to in the Discussion Paper on Page 22. • Recognition that Campbellville has many of the attributes of a Village within our community. The concept of complete communities, as it typically applies to rural Villages, should be applied to Campbellville. Continued support for community facilities and support for revitalization and development are needed. Upgrades to the municipal water and wastewater systems should be examined. • Recognition that Elements Casino Mohawk and Monaghan Mushrooms are the two largest employers in the rural area • Managing the off-site impacts of conservation area events. We recognize the desire of conservation areas to seek additional revenue sources. A number of rural residents have noticed 14 the increase in the special events at the conservation areas. These events should be subject to special municipal events permits that manage and mitigate off-side impacts 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> We ask that the ROP be updated with respect to Aggregate extraction to reflect changes in provincial policies and plans, such as the Greenbelt Plan. We ask that resident's groups such as ACTIONMilton and the Nassageway Community Consultation Committee be recognized as stakeholder groups and as such be consulted for input as part of a JART process, and included in location decisions where regional plans allow mineral aggregates. The Regional Aggregate Resources Reference Manual also needs to be updated and we ask that ACTION and NCCC be brought into the partnership with public agencies, the aggregate industry and citizen groups for this update. Provide for policy within the NEC area. Our understanding is that the NEC will consider Regional and Municipal policy when considering planning considerations. Recognizing the importance of access to high speed internet in the rural area as an essential need 	<p>Comments are acknowledged. Please see above for a detailed response.</p>
7.	Sundial Homes Limited	<p>Attached per email dated 2020-10-22</p> <p>Re: Halton Region Official Plan Review Proposed Natural Heritage Mapping Boyne Survey Secondary Plan Sundial Homes (3rd Line) Limited Sundial Homes (4th Line) Limited Town of Milton</p> <p>Dear Mr. Burke:</p> <p>KLM Planning Partners Inc. represents Sundial Homes (3rd Line) Limited and Sundial Homes (4th Line) Limited, both parcels of which are located within the approved Boyne Secondary Plan area of the Town of Milton.</p> <p>We have reviewed the proposed Natural Heritage mapping which has been released for public comment and we wish to note that both parcels of land are within an existing settlement area as well as an approved Secondary Plan, the latter of which had extensive on the ground Natural Heritage review.</p> <p>Based on the detailed environmental work undertaken as part of the Secondary Plan process, of which Conservation Halton was part of, the limits of development were defined and appropriately mapped and ultimately approved in the Secondary Plan. Draft Plans of Subdivision has been advancing in various stages of approval based on the ground work undertaken for the Secondary Plan. Given this work, we were surprised to see the proposed Natural Heritage mapping from the Region now arbitrarily adds Natural Heritage areas which do not exist.</p> <p>The Sundial Homes (3rd Line) Limited parcel, from what we can discern from the proposed mapping, does not propose additional NHS area however, the previous NHS areas from the 2009 mapping has not changed. The issue with the 2009 mapping is that it too does not reflect the work undertaken to clearly define appropriate development limits of the subject property. Currently, the 2009 mapping identifies NHS areas where there are no natural heritage attributes. As such, in our opinion, the NHS mapping should be amended to reflect the approved limits of development in order to be consistent with the approved Secondary Plan.</p> <p>The Sundial Homes (4th Line) Limited parcel, also from what we can discern from the maps, proposes to include additional NHS area from what was originally shown on the 2009 NHS maps. Again, in our opinion, the NHS mapping should clearly reflect the approved NHS limits. In the case of this particular parcel, an extensive 55-60 metre Greenland channel has been identified and provided along the western</p>	<p>Regional staff reviewed this submission regarding the draft proposed NHS mapping, including the recommendation for refinements to the mapping to reflect the NHS boundaries illustrated for the Sundial Homes (3rd Line) and Sundial Homes (4th Line) Limited parcels. The mapping refinement process as outlined in the Natural Heritage Discussion Paper includes incorporating any updates from GIS base layer data from the Province and Conservation Authorities, OMB decisions, approved planning applications, special Council Permits, and staff refinements based on in-field observations. The next version of the draft proposed NHS mapping will be updated based on Planning Act applications that have been approved post-June 2021 and in accordance with Regional Official Plan Policy 116.1. Based on the review of your submission, the draft proposed RNHS mapping for Sundial Homes (3rd Line) Limited parcel was refined as the refinements were accepted through an approved planning application as per Policy 116.1 of the Regional Official Plan (ROP). The draft proposed NHS mapping for Sundial Homes (4th Line) Limited parcel has not been updated to reflect proposed refinements through the SIS as the planning application has not been approved/accepted by the Region. We will engage with the landowner through Stage 3, Phase 3 of the ROPR to address any additional mapping refinements based on Policy 116.1.</p> <p>Regional staff continues to support the RNHS policy framework and believe it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application in accordance with Policy 116.1 of the ROP. Furthermore, the Natural Heritage Policy Direction NH-7 that an update to the policy is made to incorporate refinements to the Regional Natural Heritage System accepted by the Region through an approval process under the Planning Act occur on a more frequent basis than at the Region's statutory review of its Official Plan. This will ensure that Halton's Natural Heritage System mapping reflects the most current data available and thus the maps are as accurate as possible at a regional scale.</p>

No.	Source	Submission	Response
		<p>edge of the subject lands, which has been approved by the Town and Halton Conservation. Therefore, it is our view, the proposed NHS mapping should be amended to clearly reflect these approved NHS limits.</p> <p>Based on the above and given the Region has taken the time to review the NHS mapping for the entire Region, it is our opinion that where detailed and approved NHS limits have been determined, these should be clearly reflected in the updated mapping. Not doing so, in our view, is a disservice to the public as they may anticipate NHS areas where they clearly do not exist or they may question in the future why a Planning Act application has been submitted to redesignate an area designated NHS, when it does not exist. The more accurate the mapping, the greater certainty it provides to the development industry, municipalities and the public.</p> <p>We therefore respectfully request the NHS maps be updated to reflect the approved limits for the Sundial Homes (3rd Line) and Sundial Homes (4th Line) Limited parcels. Lastly, we also wish to be notified of any future decisions of the Natural Heritage policies and mapping.</p> <p>Yours very truly,</p> <p>KLM Planning Partners Inc.</p> <p>Keith MacKinnon, BA, MCIP, RPP Partner</p>	
8.	Naomi Murphy	<p>Email dated 2020-10-25</p> <p>To Whom it May Concern:</p> <p>This letter is to formally object to the mapping in the ROPR as seen on the Halton Region website's mapping viewer.</p> <p>I own two properties in the Halton Region and the mapping is incorrect as follows:</p> <ol style="list-style-type: none"> 1) Property 9638 4th Line, Halton Hills: the wooded area on the southwest corner is labeled as "Growth Plan for the Greater Golden Horseshoe". 2) Property 8469 Trafalgar Road, Halton Hills: areas identified as "Natural Heritage System". <p>Thank you for your attention to this matter.</p> <p>Sincerely,</p> <p>Naomi Murphy</p>	<p>Email correspondence occurred between the landowner and Regional Staff. The discussion focused on the proposed draft Regional Natural Heritage System mapping and the request for a site visit request to examine the two watercourses that have been identified on the property. The watercourses are mapped by Conservation Halton (CH). Halton Region uses this data source to map key features in the Region's Natural Heritage Mapping in accordance with the Provincial plans/policies and Regional Official Plan policies. A subsequent site visit was completed by CH and CH will not be making any updates to our ARL mapping at this time as a result of site observations, which a detailed response was provided to the landowner by CH in July 2021. Detailed e-mail correspondence with the landowner can be made available upon request.</p>

No.	Source	Submission	Response
9.	Dan and Linda Michelon	<p>Email dated 2020-10-26</p> <p>Re: Halton – Regional Official Plan Review (ROPR)</p> <p>It has recently come to our attention that the ROPR website shows our property as being shaded a light green. We could find no legend on the map to indicate the exact intention of this particular shading.</p> <p>If this is intended to be a proposed Natural Heritage Designation or Environmentally Protected Zoning, please be advised that:</p> <ul style="list-style-type: none"> - We have not dedicated or agreed to dedicate this property to conservation or natural heritage usage - We do not consent to any policy, plan, zoning, designations, setbacks or buffers etc that restricts our private property rights or usage beyond those rights of usage conveyed at the time of purchase - This message is intended to act as a Notice of Non Consent if the issue of “Implied Consent” should arise. - Please place a copy of this message in our property file for future reference - please advise us of any development or changes to planning or zoning to the property including the present ROPR - please acknowledge receipt of this notice by October 28, 2020 <p>Thank you Sincerely</p> <p>Dan & Linda Michelon</p>	<p>The draft proposed Regional Natural Heritage System mapping on these lands was included as a result of regulated flood plains as determined and mapped by the Conservation Authority. Regulated flood plains are a component of the Regional Natural Heritage System. In the Policy Directions Report, Policy Direction NH-5 is proposing to update existing policies in the Regional Official Plan on Natural Hazards to be consistent with and conform to Provincial Policies and Plans. Given the direction provided in this report, it is recommended that the Regulatory Floodplain be removed as a component of the Regional Natural Heritage System and be included in the natural hazard section of the Regional Official Plan. The intention is not to diminish the goal and objectives of the Regional Natural Heritage System but rather provide clarity and consistency with the definition of natural features in the Regional Official Plan. Therefore, if supported, these lands will not be included in the Regional Natural Heritage System.</p> <p>However, given that these lands are located within the Regulatory Floodplain as defined and mapped by the Conservation Authority, the natural hazard policies from the Provincial Policy Statement 2020, where the focus of natural hazard policies are to protect public health and safety from natural and human-made risks. The Regional Official Plan will need to be updated to reflect the hazard policies of the Provincial Policy Statement and will also include a policy to direct the Local Municipalities to include policies and mapping within their official plans and zoning by-laws to prohibit and restrict development within natural hazard lands in accordance with the Provincial Policy Statement 2020 and be required to consult and be in conformity with Conservation Authority policies. Please note that there will be no change to your zoning, Official Plan, and flood plan designations through the Regional Official Plan. The properties already have had these designations since 2005 and later. The update of the Regional Official Plan as it relates to natural hazards will occur in Stage 3, Phase 3 of the ROPR.</p>
10.	Guido Tonin	<p>Email dated 2020-10-26</p> <p>Re: Halton – Regional Official Plan Review (ROPR)</p> <p>It has recently come to our attention that the ROPR website shows our property as being shaded a light green. We could find no legend on the map to indicate the exact intention of this particular shading.</p> <p>If this is intended to be a proposed Natural Heritage Designation or Environmentally Protected Zoning, please be advised that:</p> <ul style="list-style-type: none"> - We have not dedicated or agreed to dedicate this property to conservation or natural heritage usage 	<p>Regional staff reviewed the draft proposed Natural Heritage System mapping for the subject lands. Based on staff’s review, the draft proposed Regional Natural Heritage System has not been mapped on the subject lands identified in this submission.</p>

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		<ul style="list-style-type: none"> - We do not consent to any policy, plan, zoning, designations, setbacks or buffers etc that restricts our private property rights or usage beyond those rights of usage conveyed at the time of purchase - This message is intended to act as a Notice of Non Consent if the issue of “Implied Consent” should arise. - Please place a copy of this message in our property file for future reference - please advise us of any development or changes to planning or zoning to the property including the present ROPR - please acknowledge receipt of this notice by October 28, 2020 <p>Thank you Sincerely Guido Tonin</p>	
11.	Josh Evans	<p>Email dated 2020-10-26</p> <p>Re: Halton – Regional Official Plan Review (ROPR)</p> <p>It has recently come to our attention that the ROPR website shows our property as being shaded a light green. We could find no legend on the map to indicate the exact intention of this particular shading.</p> <p>If this is intended to be a proposed Natural Heritage Designation or Environmentally Protected Zoning, please be advised that:</p> <ul style="list-style-type: none"> - We have not dedicated or agreed to dedicate this property to conservation or natural heritage usage - We do not consent to any policy, plan, zoning, designations, setbacks or buffers etc that restricts our private property rights or usage beyond those rights of usage conveyed at the time of purchase - This message is intended to act as a Notice of Non Consent if the issue of “Implied Consent” should arise. - Please place a copy of this message in our property file for future reference - please advise us of any development or changes to planning or zoning to the property including the present ROPR - please acknowledge receipt of this notice by October 28, 2020 <p>Thank you Sincerely Josh Evans & Kristy Bridgman</p>	<p>Regional staff reviewed the draft proposed Natural Heritage System mapping for the subject lands. Based on staff’s review, the draft proposed Regional Natural Heritage System has not been mapped on the subject lands identified in this submission.</p>
12.	Lynda and Mario Tesser	<p>Email dated 2020-10-27</p> <p>Re: Halton – Regional Official Plan Review (ROPR)</p> <p>It has recently come to our attention that the ROPR website shows our property as being shaded a light green. We could find no legend on the map to indicate the exact intention of this particular shading.</p> <p>If this is intended to be a proposed Natural Heritage Designation or Environmentally Protected Zoning, please be advised that:</p>	<p>Regional staff reviewed the draft proposed Natural Heritage System mapping for the subject lands. Based on staff’s review, the draft proposed Regional Natural Heritage System has not been mapped on the subject lands identified in this submission.</p>

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13.	Merla and Vaughn Johnstone	<p>Email dated 2020-10-30</p> <p>Re: Halton - Regional Official Plan Review (ROPR)</p> <p>This comment is supplemental to our original notice of non-consent dated 27 October 2020.</p> <p>We have owned this property for more than 32 years. At the time of purchase, we were told that it was zoned as Multiple Uses. We have been recently informed that it is presently zoned Future Development with overlays of natural heritage system originating from ROPA 38. We had never been personally consulted or contacted in regards to these changes in designation or zoning. For this reason, we are particularly interested in closely following the present ROPR. We are concerned about changes in designations and zoning lowering our property usage and value.</p> <p>The ROPR website mapping titled "Regional Official Plan review -Draft Mapping " contains light green shading along some portions of Peru Road that also extends along both sides of Steeles Avenue west. This shaded area is identified in the legend as "Proposed Draft NHS (Natural Heritage System) System Components (Buffers/Enhancements/Linkages)" Some darker green shading on this map appears to more closely follow 16 mile creek. The ROPA 38 legend boxes do not appear to respond to show the original ROPA 38 NHS features.</p> <p>Please provide information to the following questions:</p> <p>1- Is the light green shading part of the original ROPA 38 NHS designation or is it an addition to the dark green shading that may have been the original ROPA 38 area?</p> <p>2 - What are the additional requirements of the proposed system components and layers. Will we need additional approvals / permits / assessments etc, from the Town of Milton, Environmental Assessments by Conservation Authorities and now permits from The Region of Halton that are presently not required if we want to make changes to our proposed NHS designated areas?</p> <p>3 - Will these proposed NHS system components result in a change of zoning and Bylaw requirements such as seen in EP (Environmentally Protected) Zoning areas?</p> <p>4 - The property adjacent to our Southwest border is separated only by a wood or wire fence line and shares the same elevations, topography and vegetation as 42 Peru Rd. In fact, it contains feeder tributaries to 16 mile creek which might be considered even more environmentally sensitive. It does not</p>	<p>The draft proposed Regional Natural Heritage System mapping on these lands was included as a result of regulated flood plains as determined and mapped by the Conservation Authority. Regulated flood plains are a component of the Regional Natural Heritage System. In the Policy Directions Report, Policy Direction NH-5 is proposing to update existing policies in the Regional Official Plan on Natural Hazards to be consistent with and conform to Provincial Policies and Plans. Given the direction provided in this report, it is recommended that the Regulatory Floodplain be removed as a component of the Regional Natural Heritage System and be included in the natural hazard section of the Regional Official Plan. The intention is not to diminish the goal and objectives of the Regional Natural Heritage System but rather provide clarity and consistency with the definition of natural features in the Regional Official Plan. Therefore, if supported, these lands will be not be included in the Regional Natural Heritage System.</p> <p>However, given that these lands are located within the Regulatory Floodplain as defined and mapped by the Conservation Authority, the natural hazard policies from the Provincial Policy Statement 2020, where the focus of natural hazard policies are to protect public health and safety from natural and human-made risks. The Regional Official Plan will need to be updated to reflect the hazard policies of the Provincial Policy Statement and will also include a policy to direct the Local Municipalities to include policies and mapping within their official plans and zoning by-laws to prohibit and restrict development within natural hazard lands in accordance with the Provincial Policy Statement 2020 and be required to consult and be in conformity with Conservation Authority policies. Please note that there will be no change to your zoning, Official Plan, and flood plan designations through the Regional Official Plan. Your properties already have had these designations since 2005 and later. The update of the Regional Official Plan as it relates to natural hazards will occur in Stage 3, Phase 3 of the ROPR.</p>

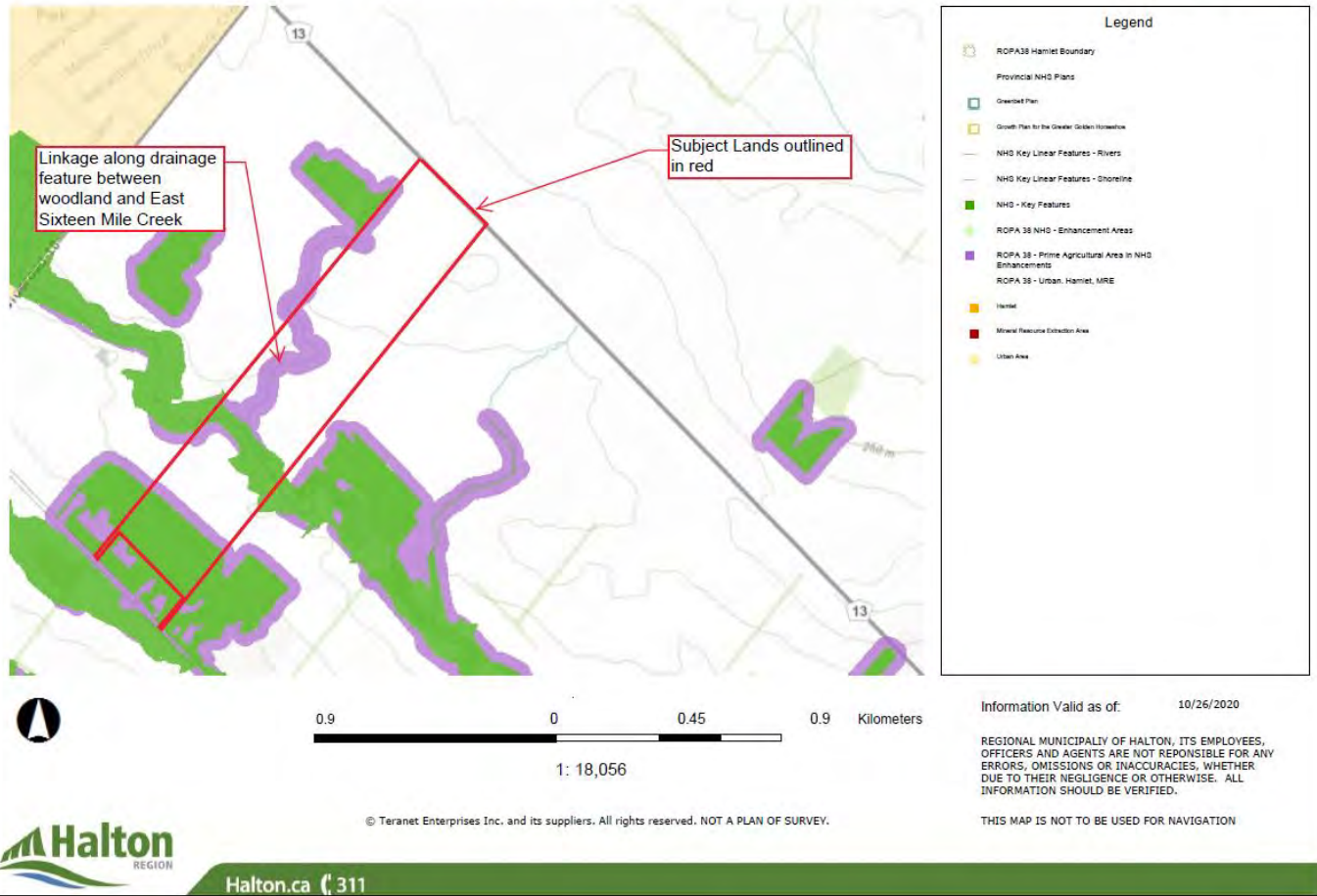
No.	Source	Submission	Response
		<p>appear to have the same restrictive mapping. Why do we at 42 Peru not share the same map shading, designation, Zoning, etc as this adjacent neighbour?</p> <p>5 - We could find no definitions or parameters for the proposed system of Buffers/Enhancements/Linkages - for example - size of buffers or setbacks from identifiable features. Where can we find the details of these proposals located on our individual/specific properties?</p> <p>Please acknowledge receipt of our comments and questions for inclusion on our property file.</p> <p>Sincerely Merla and Vaughn Johnstone 30 October 2020</p>	
14.	Mike and Amanda Michelin	<p>Email dated 2020-10-26</p> <p>Re: Halton - Regional Official Plan Review (ROPR)</p> <p>It has recently come to our attention that the ROPR website shows our property as being shaded a light green. We could find no legend on the map to indicate the exact intention of this particular shading. If this is intended to be a proposed Natural Heritage Designation or Environmentally Protected Zoning, please be advised that:</p> <ul style="list-style-type: none"> - we have not dedicated or agreed to dedicate this property to conservation or natural heritage usage - we do not consent to any policy, plan, Zoning, designations, setbacks or buffers etc that restricts our private property rights or usage beyond those rights of usage conveyed at the time of purchase - this message is intended to act as a Notice of Non Consent if the issue of "Implied Consent " should arise - please place a copy of this message on our property file for future reference - please advise us of any development or changes to planning or zoning to the property including the present ROPR 	<p>The draft proposed Regional Natural Heritage System mapping on these lands was included as a result of regulated flood plains as determined and mapped by the Conservation Authority. Regulated flood plains are a component of the Regional Natural Heritage System. In the Policy Directions Report, Policy Direction NH-5 is proposing to update existing policies in the Regional Official Plan on Natural Hazards to be consistent with and conform to Provincial Policies and Plans. Given the direction provided in this report, it is recommended that the Regulatory Floodplain be removed as a component of the Regional Natural Heritage System and be included in the natural hazard section of the Regional Official Plan. The intention is not to diminish the goal and objectives of the Regional Natural Heritage System but rather provide clarity and consistency with the definition of natural features in the Regional Official Plan. Therefore, if supported, these lands will be not be included in the Regional Natural Heritage System.</p>

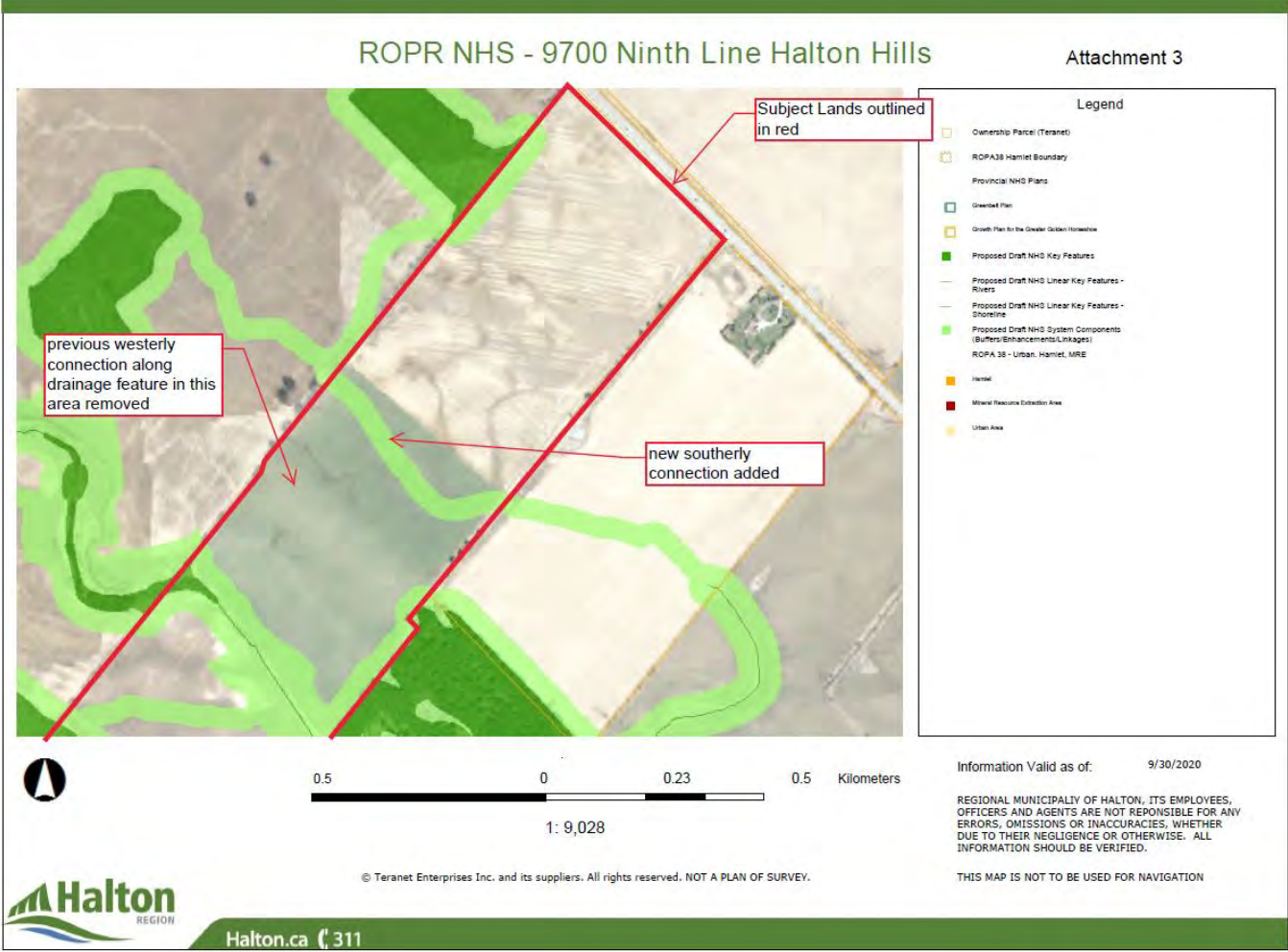
No.	Source	Submission	Response
		<p>- please acknowledge receipt of this notice by 28 October 2020</p> <p>Thank you Sincerely Mike and Amanda Michelin</p>	<p>However, given that these lands are located within the Regulatory Floodplain as defined and mapped by the Conservation Authority, the natural hazard policies from the Provincial Policy Statement 2020, where the focus of natural hazard policies are to protect public health and safety from natural and human-made risks. The Regional Official Plan will need to be updated to reflect the hazard policies of the Provincial Policy Statement and will also include a policy to direct the Local Municipalities to include policies and mapping within their official plans and zoning by-laws to prohibit and restrict development within natural hazard lands in accordance with the Provincial Policy Statement 2020 and be required to consult and be in conformity with Conservation Authority policies. Please note that there will be no change to your zoning, Official Plan, and flood plan designations through the Regional Official Plan. Your properties already have had these designations since 2005 and later. The update of the Regional Official Plan as it relates to natural hazards will occur in Stage 3, Phase 3 of the ROPR.</p>
15.	Antonia and Mathew Putica	<p>Email dated 2020-10-27</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper</p> <p>The nature of this letter is to voice our objection to the proposed provincial expansion of the Natural Heritage System on our land. We do not see the scientific and/or environmental rationale behind this proposed expansion. Under this proposal, it would expand the NHS by approximately 5-6 acres on our land, in addition to the existing and already substantial woodland and waterway setbacks.</p> <p>Please formally register this complaint for your records and provide your justification for this proposed NHS expansion.</p> <p>Kindly confirm receipt of this email. Regards,</p> <p>Mathew Putica Antonia Putica</p>	<p>The landowners met with Regional staff on February 3, 2021, to discuss the Natural Heritage System for the Growth Plan mapping on the subject lands. In 2017, the Growth Plan was updated to include policies on the Natural Heritage System for the Growth Plan. In 2018, draft mapping of this system was released by the Province and the mapping of this system has been verified by the Region. As per policy 4.2.2 of the Growth Plan, municipalities must incorporate the Natural Heritage System for the Growth Plan policies and mapping.</p>
16.	Halton Hills Investment Corp.	<p>Attached per email dated 2020-10-28</p> <p>Dear Mr. Benson: Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 9700 Ninth Line Part Lot 9, Concession IX (Esquesing) Town of Halton Hills</p>	<p>Regional staff has met with the landowner to discuss the landowner's recommendations as it relates to the removal of certain NHS components (Linkages) through the subject lands. Regional staff conducted a site visit in May 2021 and analyzed the results of the site visit and supplementary information. We will continue to engage with the landowner on the draft proposed Natural Heritage System mapping through the Stage 3 Phase 3 ROPA. Detailed E-mail Correspondence can be made available upon request.</p>

No.	Source	Submission	Response
		<p>I have been retained by Halton Hills Investment Corp. to provide professional planning advice related to the proposed natural heritage system outlined within the Natural Heritage Discussion Paper (June 2020) as it pertains to 9700 Ninth Line in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p> <p>The Subject Lands are located on the west side of Ninth Line, south of 10 Sideroad as shown on Attachment 1. The property is used for agricultural purposes and there is currently no residence or other structures on the property. There are three areas of RNHS on the Subject Lands (Attachment 2). The first appears to follow the limits of a drainage feature that flows in a westerly direction from a woodland located to the north of the Subject Lands to a tributary of Sixteen Mile Creek (East Sixteen Mile Creek) on the Subject Lands. Based on a site inspection that I undertook on October 23, 2020, this westerly drainage feature connection to the East Sixteen Mile Creek does not exist on the landscape. This is supported by Conservation Halton’s online Approximate Regulation Limit mapping (Attachment 1). The second area is associated with the East Sixteen Mile Creek that flows southerly through the Subject Lands. The third area is associated with a woodland/wetland at the western limit of the Subject Lands.</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The proposed RNHS limits have been revised through the Subject Lands as compared to the ROPA 38 NHS (Attachment 3). Specifically, within the central portion of the property, the drainage feature flowing westerly from the woodland to the north of the Subject Lands into the East Sixteen Mile Creek on the Subject Lands is no longer shown. Instead, the east-west linkage has been replaced with a north-south linkage along what is shown as a Hydrologic Connection, sometimes referred to as a Headwater Drainage Feature, on CH’s online mapping (Attachment 1). Based on the ROPR online mapping, this drainage feature is being shown as an NHS Component, rather than as an NHS Key Feature, which would mean it is intended to fulfill either a Linkage, Buffer or Enhancement Area function. Given that the RNHS along the drainage feature continues northerly to two wetland/woodland features on the property at 14256 No. 10 Sideroad, it is assumed that it is being shown as a Linkage however, confirmation of this would be appreciated.</p> <p>Based on the assumption that it is intended to be a Linkage, Section 255 of the Region of Halton Official Plan defines Linkages as follows:</p> <p>means an area intended to provide connectivity supporting a range of community and ecosystem processes enabling plants and animals to move between Key Features over multiple generations. Linkages are preferably associated with the presence of existing natural areas and functions and they are to be established where they will provide an important contribution to the long term sustainability of the Regional Natural Heritage System. They are not meant to interfere with normal farm practice. The extent and location of the linkages can be assessed in the context of both the scale of the proposed development or site alteration, and the ecological functions they contribute to the Regional Natural Heritage System. (emphasis added)</p> <p>As is visible on air photos, and based on a site inspection on October 23, 2020 after a significant rainfall, this drainage feature is cropped through annually and does not have any associated riparian vegetation through the Subject Lands or through the neighbouring lands to the north and south. A review of Google Earth images dating back to 2004 confirms that this feature is either barely visible or not at all visible on air photos over the past two decades. Over that time period, the lands have been actively farmed and no riparian vegetation is visible.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The distance between the upper limit of the regulated watercourse (at the very southern limit of the lands to the south – i.e., 9660 Ninth Line) and the woodland to the north is approximately 900m. Although the Subject Lands are not within the Growth Plan NHS, it is interesting to note that Growth Plan Policy 4.2.2.3(a)(ii) requires demonstration that the connectivity between key natural heritage features and key hydrologic features located within 240m of each other will be maintained and, where possible, enhanced for the movement of native plants and animals across the landscape. The provision of a 900m linkage along an unvegetated swale seems excessive and not in-keeping with Provincial practice in terms of proximity of features for connection through an NHS.</p> <p>Of note, there is a much more substantial watercourse (East Sixteen Mile Creek) on the Subject Lands (Attachment 1) which is in close proximity to one of the two wetland/woodland features on the property to the north (within 80m of the watercourse, within 50m of the flood plain associated with the watercourse), it is respectfully recommended that it is not necessary to force a linkage between the upper limit of CH's regulated watercourse on the property to the south (9660 Ninth Line) and the wetland/woodland feature 900 m to the north. It is respectfully recommended that there is a much more logical and defensible linkage connection between the more substantial watercourse to the west and the woodland/wetland on the property to the north. The proposed ROPR NHS mapping shows a connection between the woodland and East Sixteen Mile Creek so such a connection is not in addition to what the Region is already proposing on the lands to the north.</p> <p><u>Recommendation</u></p> <p>Based on a review of the ROPR RNHS mapping, ROPA 38 RNHS mapping and CH's approximate regulation limit mapping, it is respectfully recommended that the Region remove the NHS Component (Linkage) through the central portion of the Subject Lands. A 900m linkage along this undefined and difficult to discern drainage feature, with no associated riparian vegetation, appears to be out of place and not in-keeping with the Region's stated definition for Linkages. The length of the linkage is also not in-keeping with Provincial direction which suggests that features within 240m of one another should be considered for connectivity. It is respectfully recommended that, if the intention is to provide a connection between the wetland/woodland on the property to the north of the Subject Lands and a water feature, it would be more appropriate to utilize the linkage that is proposed between the woodland and East Sixteen Mile Creek on the property to the north, rather than along this undefined drainage feature on 9700 and 9660 Ninth Line.</p> <p>Prior to identifying any new components of the RNHS within the Official Plan mapping, it is requested that Regional staff, or their representative, attend on-site to view the feature(s) in the field.</p> <p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly,</p> <p>Jennifer Lawrence, MCIP, RPP President</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">9700 Ninth Line Halton Hills Attachment 1</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">ROPA 38 NHS - 9700 Ninth Line Halton Hills Attachment 2</p>  <p>The map displays the ROPA 38 NHS area with various land use designations. A red outline highlights specific 'Subject Lands'. A red line indicates a 'Linkage along drainage feature between woodland and East Sixteen Mile Creek'. The legend identifies features such as ROPA38 Hamlet Boundary, Provincial NHD Plans, Growth Plan for the Greater Golden Horseshoe, and various NHD Key Linear Features. A scale bar shows 0.9, 0, 0.45, and 0.9 Kilometers. The map is dated 10/26/2020 and includes a disclaimer: 'REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED. THIS MAP IS NOT TO BE USED FOR NAVIGATION.'</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

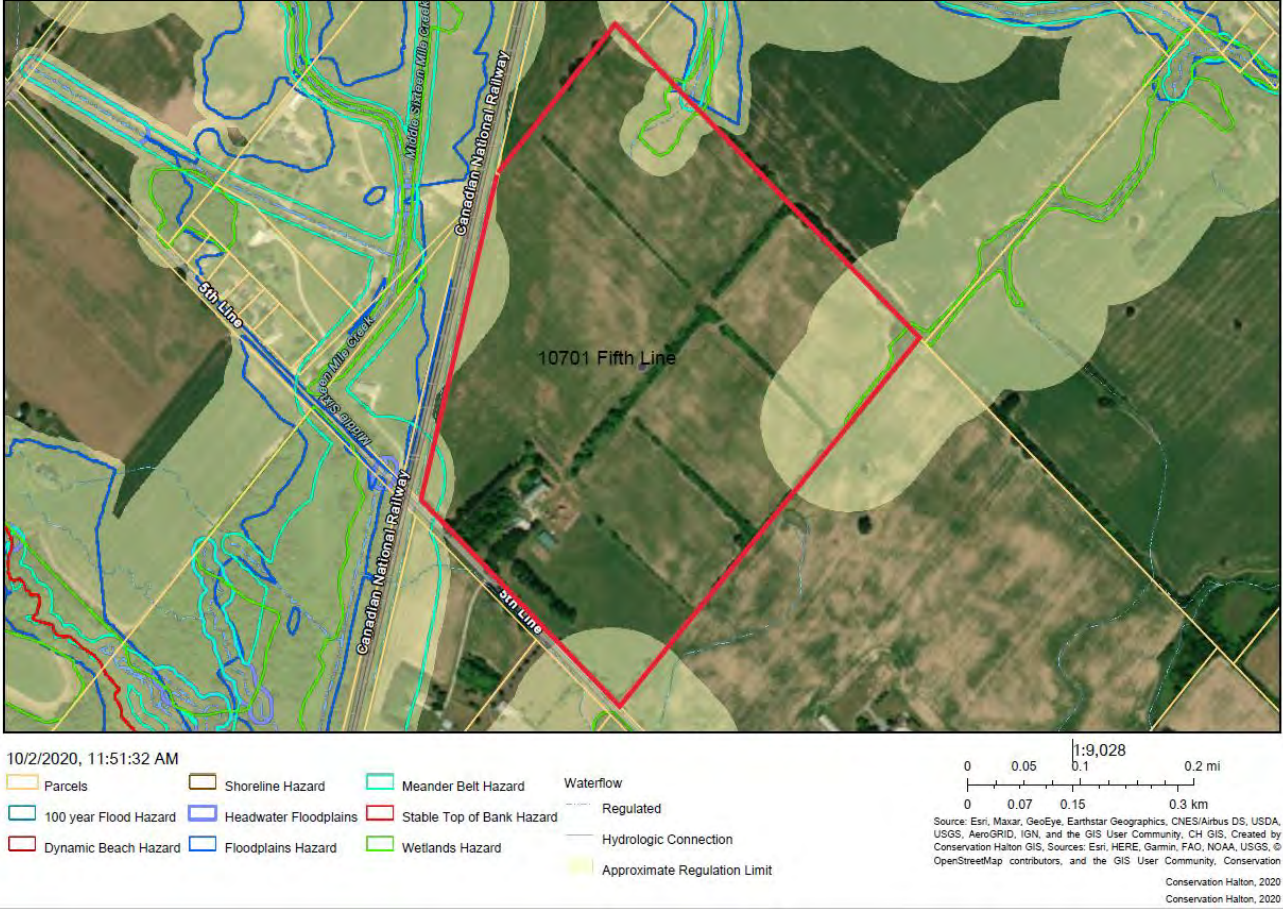
No.	Source	Submission	Response
			<p>Comments are acknowledged. Please see above for a detailed response.</p>
17.	Halton North 1 Corporation	<p>Attached per email dated 2020-10-28</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 10701 Fifth Line Town of Halton Hills</p> <p>I have been retained by Halton North 1 Corporation to provide professional planning advice related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 10701 Fifth Line in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p>	<p>Regional staff met with the landowner and consultant in February 2021. At the meeting, the Natural Heritage System mapping for the Growth Plan and the proposed draft Regional Natural Heritage System mapping. The wetlands on the property are mapped by Conservation Halton (CH). Halton Region uses this data source to map key features in the Region's Natural Heritage Mapping in accordance with the Provincial plans/policies and Regional Official Plan policies. CH staff reached out to the landowner to schedule a site visit and the landowner deferred the site visit to a later date as a result of their concerns with the Natural Heritage System mapping for the Growth Plan. Regional Planning staff indicated that the linkage in question was not an area of the Growth Plan NHS that the Region has recommended for refinement/removal given that, based on the principles identified on Page 39 of the Growth Plan NHS Mapping Technical Report ('Technical</p>

No.	Source	Submission	Response
		<p>The Subject Lands are located south of 15 Sideroad, on the east side of Fifth Line and contains two small areas designated RNHS within the current Region of Halton Official Plan (Attachment 1). These small areas are associated with what Conservation Halton (CH) has mapped as wetlands and the 30m buffer associated with these features (Attachment 2). It is recommended that the feature identified as a wetland in the southeast corner is in fact just a hedgerow. This should be confirmed through a site meeting with staff from the Region and Conservation Halton.</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The extent of RNHS on the Subject Lands has increased substantially as compared to the existing ROPA 38 RNHS (Attachment 3). This increase is attributable to a 500m wide NHS corridor established through the Growth Plan.</p> <p><u>Growth Plan NHS</u></p> <p>The Growth Plan NHS is a 500m wide corridor that has somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection.</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances when HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. The Subject Lands contain what HAPP refers to as the 'northern link' of this 'Y' shaped connection. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances when HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. The Subject Lands contain what HAPP refers to as the 'northern link' of this 'Y' shaped connection. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:</p> <p>A y-shaped linkage is proposed within Halton Hills, extending between lands located in the existing Greenbelt NHS associated with 16 Mile Creek (the "southern link"), lands in the Niagara Escarpment Plan Area (NEPA) to the north (the "northern link") and designated greenfield areas in Southwest Georgetown to the east (the "eastern link"). This linkage is approximately 500m wide and delineation of this linkage does not appear to consider the RNHS.</p> <p>It is unclear what natural lands the y-shaped linkage is intended to connect to along the 'eastern link'. It is assumed it is intended to connect to woodlands and valleylands associated with Silver Creek. The</p>	<p>Report'), the mapping of this linkage appears to be consistent with the criteria, rationale, and methods identified in that technical report. As noted in the last meeting, any technical discussions regarding the principles and the methodology of the Growth Plan NHS mapping should be directed to the Provincial Ministries (i.e. NDMNRF). Detailed E-mail Correspondence can be made available upon request.</p>

No.	Source	Submission	Response
		<p>land in between is a designated greenfield area and is currently undergoing a Secondary Planning exercise. While some lands will be designated NHS and open space through that process, other lands will be designated for various residential, institutional and employment related uses. There will be no opportunity for a regional scale linkage across these lands given that no linkage has been identified in the Secondary Plan or associated Subwatershed Study to bridge the large gap between natural features that the province's GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Reign's Transportation Master Plan, will represent a barrier. Please consider eliminating this linkage in consideration of the fact that a connected regional scale linkage will not be possible in this area.</p> <p>Given Growth Plan policies relating to Settlement Boundary Expansions as they relate to the GPNHS, outlined in section 2.2.8.f), options for expansion of settlement boundaries westward from the designated greenfield area in Southwest Georgetown will be made difficult due to the presence of the proposed 'eastern link'. While we agree that there may be justification for a local linkage in this area to connect to the more robust regional linkage between the Greenbelt NHS and the NEPA (the 'northern/southern link'), a 500m wide regional linkage (the 'eastern link') is unwarranted given the issues noted in the preceding comment and thus will constrain settlement boundary expansions in this area unnecessarily.</p> <p>Further, if the Province's intention was to connect to the woodlands and valleylands associated with Silver Creek, as was assumed by HAPP, the proposed Secondary Plan NHS configuration east of Trafalgar Road does not facilitate this connection but rather, results in the 'eastern link' of the Growth Plan NHS connecting to Sixteen Mile Creek rather than Silver Creek.</p> <p>This requirement for the 'eastern link' is further questioned within the Mapping Audit Technical Memo, Review of the Regional Official Plan Natural Heritage Systems Policies and Mapping, prepared for the Region by Gladki Planning Associates et. al. dated May 2020. Section 3.2.4 provides options for refinements to the Growth Plan NHS in Halton and includes 'Areas for Further Discussion' that states:</p> <p style="padding-left: 40px;">Patches that do not fulfill Growth Plan objectives: three of the additional polygons do not provide the intended function, for example a portion of the "Y" west of Georgetown which relies on connection being established through the SW Georgetown Area (see NS_ID 1182 in Appendix 1).</p> <p>A review of Appendix 1 reveals that there is no NS_ID 1182 however, NS_IDs 1122, 1127 and 1129 refer to "Part of the 'Y' west of Trafalgar Rd in Halton Hills. Partially connects Sixteen Mile Creek to the Niagara Escarpment and partial connection to SW Georgetown". Based on this description, it is assumed that the reference within Section 3.2.4 was intended for one or all of the above noted NS_IDs rather than NS_ID 1182. Based on that assumption, each of these three areas within Appendix 1 are noted as requiring internal discussion with respect to whether this portion of the Growth Plan NHS should be retained or removed. The Natural Heritage Discussion Paper does not elaborate on the internal discussion that took place between the release of the May 2020 technical memo and the June 2020 Discussion Paper or whether it is the Region's intention to undertake those internal discussions subsequent to receiving comments on the Discussion Paper. This requires further clarification.</p> <p>Given that the 'eastern link' does not appear to fulfill the objectives to connect Sixteen Mile Creek to Silver Creek, it is questioned whether any portion of this 'Y' connection is necessary, including the 'northern link' through the Subject Lands given that it is unclear as to whether the 'northern link' was simply an extension of the 'eastern link' that no longer appears to serve a purpose from a connectivity perspective given the Secondary Plan land use designations east of Trafalgar Road.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

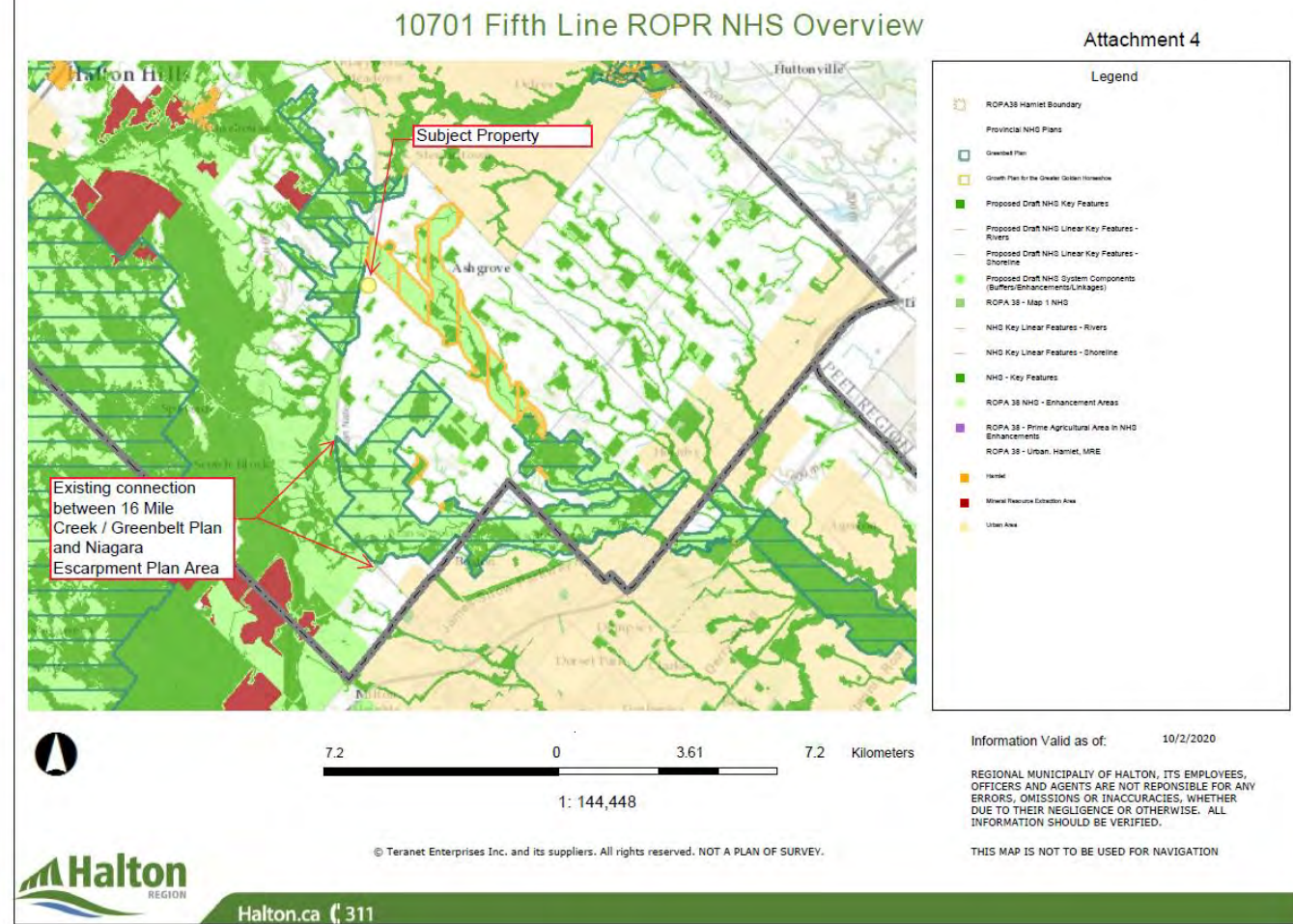
No.	Source	Submission	Response
		<p>It is respectfully recommended that a robust connection between the Greenbelt Plan Area and the Niagara Escarpment Plan Area already exists between Regional Road 25 and Third Line at 10 Sideroad, just a couple of kilometres to the west of the 'Y' connection created by the Growth Plan NHS (Attachment 4). The creation of this second extensive connection by the Province, in proximity to an existing and more logical connection between the Greenbelt and Niagara Escarpment Plan is questionable.</p> <p>The issues raised by HAPP in 2017 and as reiterated in the Mapping Audit Technical Memo (May 2020) remain valid and should continue to be pursued by the Region through the ROPR process. It is respectfully recommended that the Region take this opportunity to request that the Province refine the Growth Plan NHS limits as provided for in Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3:</p> <p>4.2.2.4 Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply 4 P a g e outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.</p> <p>4.2.2.5 Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review.</p> <p>5.2.2.3 The Province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.</p> <p><u>Recommendation</u></p> <p>Based on a review of mapping from the ROPR RNHS, Growth Plan NHS, CH Online Mapping and OPA 32 mapping (Vision Georgetown Secondary Plan), as well as the Natural Heritage Discussion Paper (June 2020) and the Halton Area Planning Partnership 2017 submission to the Province, it is respectfully recommended that the Region request that the Province revise/remove the Growth Plan NHS along the 'northern link' of the NHS 'Y' connection through the Subject Lands given that this NHS linkage contains limited natural heritage features and is essentially duplicating an existing robust connection a couple of kilometres to the west. This recommendation is in-keeping with the Regional and Town Council endorsed recommendation provided by the Halton Area Planning Partnership to the Province in 2017 and a request for such a revision through a Municipal Comprehensive Review process is permitted through Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3.</p> <p>In addition, it is requested that the Region attend on-site with Conservation Halton staff to view the feature that has been identified as a wetland in the southeast corner of the property.</p> <p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Jennifer Lawrence, MCIP, RPP President</p> <p>10701 Fifth Line ROPA 38 NHS</p> <p>Attachment 1</p>  <p>Legend</p> <ul style="list-style-type: none"> ROPAs38 Hamlet Boundary Proposed Draft NHG Key Features Proposed Draft NHG Linear Key Features - Rivers Proposed Draft NHG Linear Key Features - Shoreline ROPAs38 - Map 1 NHG NHG Key Linear Features - Rivers NHG Key Linear Features - Shoreline NHG - Key Features ROPAs38 NHG - Enhancement Areas ROPAs38 - Prime Agricultural Area in NHG Enhancements ROPAs38 - Urban, Hamlet, MRE Hamlet Mineral Resource Extraction Area Urban Area <p>Information Valid as of: 10/2/2020</p> <p>REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED.</p> <p>THIS MAP IS NOT TO BE USED FOR NAVIGATION</p> <p>© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">10701 Fifth Line Halton Hills CH ARL Attachment 2</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">10701 Fifth Line ROPR NHS</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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Comments are acknowledged. Please see above for a detailed response.

Email dated 2021-08-13

Hi Dan and Heather,

Further to Heather Watts' email below, we would like to request a meeting with you as soon as possible as we continue to request that this matter be addressed through the current ROPR. As outlined in our correspondence, now that the Region has requested that the Province remove the eastern arm of the Growth Plan 'Y' NHS connection we are requesting that the Region approach the Province to re-run their GIS model to determine whether in fact it would continue to identify a northerly connection at this location. As we have noted, there are extremely limited NHS features within the northerly arm of the Growth Plan 'Y' NHS connection and it would be reasonable for the Region to approach the Province to request a further analysis of this area given the changes that are being requested to the Growth Plan NHS in this immediate vicinity. This is an important point of clarification since the Growth Plan NHS is adding a significant area of land to the Region's NHS that was not previously included in an NHS designation. The addition of such a significant area to the NHS, when there are such limited natural heritage features in this area, should only be undertaken after sufficient analysis has been completed to confirm that this is an appropriate location for an NHS designation. In our opinion, the change to the Growth Plan NHS limits in the immediate vicinity of 10701 Fifth Line should be sufficient justification for

No.	Source	Submission	Response
		<p>the Region to request that the Province re-run their model and to justify the requirement for an NHS in this area.</p> <p>Could you please provide your availability for a 30 minute meeting next week?</p> <p>Thank you,</p> <p>Jennifer</p> <p>Attached per above email dated 2021-08-13</p> <p><u>NATURAL HERITAGE SYSTEM BACKGROUNDER – Spring 2021</u></p> <p>Opportunity for NHS Refinement</p> <ul style="list-style-type: none"> • The provincial mapping of the NHS was released in Feb 2018. In July 2019, municipalities were offered the opportunity to submit refinements of the NHS mapping for provincial approval at any time in advance of the municipal comprehensive review (July 2022). <ul style="list-style-type: none"> ○ The focus of the technical review is on potential data mapping errors and will consider features and/or areas to be added or removed from the NHS mapping. Requests will be considered if they are consistent with the previously consulted principles and criteria for the provincial NHS. ○ Opportunity to refine based on site specific conditions <p>Core and Linkage Concept to support Natural Heritage Systems</p> <ul style="list-style-type: none"> • The NHS was created using the “Core” and “Linkage” concept - comprised of natural heritage features, core areas and linkages which are intended to provide connectivity and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. • The system can include natural areas and public lands, lands that have been restored or have the potential to be restored to a natural state, associated areas that support hydrologic functions, and working landscapes that enable ecological functions to continue. • The key concept in the development of the NHS is that everything is connected, with the primary components of the system being core areas and linkages. • “Core areas” are the building blocks of an NHS and should be the most enduring natural areas within the landscape. They usually contain the least disturbed and largest of remaining natural areas. • “Linkages” are the corridors and functional routes between core areas that provide the connections. Linkages allow the movement of plants and animals and enable ecological processes to continue across the landscape by reducing habitat fragmentation and isolation. They may contain less natural cover than what is in core areas. • It should be noted that although the NHS was created using the Core and Linkage concept, the APTG policies do not distinguish between these two main components. The APTG policies treat the NHS as one entity, with additional policies for key natural heritage features and key hydrologic features. <p>Principles and Criteria for developing the Provincial NHS</p> <ul style="list-style-type: none"> • The principles and criteria for developing the provincial NHS was consulted on in 2017. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • The principles for developing the provincial NHS include: <ul style="list-style-type: none"> ○ Consistency with current provincial NHS planning criteria and guidance (e.g., Natural Heritage Reference Manual and Greenbelt Natural Heritage System). ○ Scale of the system should focus on identifying larger core areas and broader linkages with a regional landscape context. ○ Connection of the NHS mapping to existing regional mapping in adjacent areas as much as reasonably possible (i.e. will edge match to other natural heritage system in adjacent planning areas such as the Greenbelt). • The criteria used for the NHS include: <ul style="list-style-type: none"> ○ Core areas that are larger areas that are at least 50% natural cover or public lands. This ensures that the natural features are the predominant type of cover in core areas which is consistent with the methodology used in the Oak Ridges Moraine and Greenbelt. ○ In areas of the GGH with lower natural cover (e.g. Halton Region), core size criteria are at least 100 ha. ○ Linkages provide the connections between the core areas that facilitate movement of organisms and support healthy, functioning ecosystems. <ul style="list-style-type: none"> ▪ Linkages can consist of natural features and rural/agricultural lands without barriers to animal and plant movement. ▪ Multiple linkages were also selected, where possible, to create multiple connections between core areas which provides options for species movements and provides a safety net in case linkages are lost. ▪ Linkages were also made to connect adjacent regional NHSs to ensure connectivity beyond the landscape planning area (e.g., connections from the Growth Plan NHS to the Greenbelt Plan NHS). ▪ There is no minimum or maximum length for a linkage between cores and intervening cover. ▪ Linkage width criteria is 500m and any natural features that extend beyond this boundary as wider linkages are required for landscape-scale NHSs intended to conserve biodiversity and ecological functions over the long term. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>
18.	Paul Ambrose	<p>Attached per e-mail dated 2020-10-28</p> <p>Regional Official Plan Review - General Questionnaire</p> <p>Name: Paul Ambrose Would you like to use this email to sign up for ROPR email notifications?</p> <p>Yes</p> <p>Municipality of Interest: Oakville</p> <p>Natural Heritage</p> <p>7. The current Regional Official Plan aims to protect approximately 50% of the total area of Halton for Natural Heritage. Is this an appropriate goal to maintain? Are there other ways to measure how effective we are at protecting the environment?</p>	<p>Comments related to agriculture-related uses and on-farm diversified uses and the need for a flexible approach will be considered under RAS-2. The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas sets out criteria for these permissions and these uses being secondary to agriculture are included. The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas also recommends 2 percent maximum lot coverage for on-farm diversified uses up to 1 ha and these uses must be secondary to the principal agricultural use of the property.</p> <p>It is important to note that Regional Official Plan Amendment No. 48 (ROPA 48) was approved by the Minister of Municipal Affairs and Housing on November 10, 2021. ROPA 48 updates the current Regional Structure. It identifies a hierarchy of strategic growth areas in the Regional Official Plan to help accommodate population and job growth to 2051, as required by the Provincial Growth Plan.</p> <p>Regional staff note that comments on the IGMS have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA</p>

No.	Source	Submission	Response
		<p>I would say a minimum of 50% should be protected - more if possible. Once a Natural Heritage area or a potential such area has been taken over for other uses, it is unlikely that it can ever be recovered.</p> <p>8. Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?</p> <p>Nothing comes to mind.</p> <p>Rural and Agricultural System</p> <p>9. Should Halton adopt a flexible approach in allowing agriculture-related uses and on-farm diversified use businesses in the agricultural area to support the economic vitality of farms and farmers?</p> <p>Yes, however such uses should remain secondary to the prime agricultural use of the land.</p> <p>10. Should agriculture-related uses and on-farm diversified use businesses be limited in size and scale in order to protect the agricultural land base?</p> <p>Yes, otherwise the land base is no longer primarily agricultural.</p> <p>11. Regarding the matters discussed here, do you have other suggestions that could help strengthen the vitality and resiliency of the agricultural sector?</p> <p>The options listed in the discussion paper seem to be quite encompassing.</p> <p>Climate Change</p> <p>12. What do you think is the biggest climate change challenge for Halton to address through land-use planning in the next 20 years?</p> <p>Population growth. The more people there are living in an area, the greater their impact on the environment and the climate will be. Preservation of the Natural Heritage System, green space and the urban tree canopy are of utmost importance.</p> <p>13. What do you think the Region should do to help you reduce your carbon emissions? For example, if you typically commute by car to work or school every day, what would make you consider taking transit, biking or walking?</p> <p>A more extensive and reliable transit system would help. This, however, would require major investment. Active transportation will require its own network of pedestrian and cycle paths. This would probably be difficult to implement in existing built-up areas, but is certainly possible and desirable in new developments.</p> <p>North Aldershot Planning Area</p>	<p>48), or will be addressed through the Preferred Growth Concept Submissions Chart and report anticipated to be available in early 2022. More details are also available in the IGMS policy directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>14. Given the environmental and other provincial policy constraints, what are appropriate future land uses that should be permitted in the North Aldershot Planning Area?</p> <p>No opinion</p> <p>15. Are there any additional considerations or trends that Halton Region should review in terms of the North Aldershot Review component of the Regional Official Plan Review?</p> <p>No opinion</p> <p>Integrated Growth Management Strategy: Regional Urban Structure</p> <p>16. Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other potential strategic growth areas, should be the primary focus for new houses and apartments? Why?</p> <p>The Strategic Growth Areas identified in the discussion paper would seem to be the best place for new apartments as the lands, at least in Oakville, have little or no residential buildings on them at present. Otherwise, new houses and apartments are being constructed on vacant land in North Oakville, and that seems appropriate.</p> <p>17. As the Region plans to accommodate new growth, should it focus on intensification of existing built up areas or on expansion into agricultural and natural areas? What is an appropriate balance?</p> <p>Agricultural and natural areas should be preserved from new growth development. Your maps identify lands in Oakville which will be used for future residential or employment/industrial uses. These lands are former agricultural lands which have been left unused for a number of years. So, I would say that you have already made your plans to accommodate new growth and on that basis, I would discourage expansion into agricultural and natural areas. Regarding intensification of existing built up areas, it should be limited to growth areas which have already been identified.</p> <p>18. How can the Regional Official Plan support a variety of mobility options to ensure integration of transportation and land use planning in growth areas?</p> <p>Not sure what you're looking for here.</p> <p>19. Are there opportunities for the Regional Official Plan to strengthen policies for ensuring adequate parks and open spaces near growth areas?</p> <p>Absolutely. The Region should require that all growth areas have adequate parks and open spaces in the developments.</p> <p>20. How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>No opinion.</p> <p>21. Halton’s Employment Areas are protected for employment uses such as manufacturing, warehousing, and offices. How should the Region balance protecting these Employment Areas with potential conversions to allow residential uses or a broader mix of uses?</p> <p>Not qualified to answer.</p> <p>22. The introduction of new sensitive land uses within or adjacent to Employment Areas could disrupt employment lands being used for a full range of business and/or industrial purposes. Are there other land use compatibility considerations that are important when considering where employment conversions should take place to protect existing and planned industry?</p> <p>Not qualified to answer.</p> <p>23. Having appropriate separation distances between employment uses and sensitive land uses (residential, etc.) is important for ensuring land use compatibility. What should be considered when determining an appropriate separation distance?</p> <p>Not qualified to answer.</p> <p>Conclusion</p> <p>24. Do you have any comments related to the proposed draft mapping available on the summary pages or in the Discussion Papers? The proposed draft maps for the Regional Natural Heritage System, Rural and Agricultural System and Major Transit Station Area Boundaries are located on the pages identified in the relevant Discussion Paper:</p> <p>The maps seemed to me to be well done and clear.</p> <p>25. The COVID-19 pandemic has had a number of short-term effects on the locations in which we work, study, shop, and play. Are there any long-term implications for land use planning or growth management that should be considered through this phase of the Regional Official Plan Review?</p> <p>Scientists are indicating that pandemics may be far more common in the future. I would suggest that growth targets and assumption need to be revisited and perhaps revised downwards. In pandemic situations, population density would appear to impact public health negatively. Lower densities and more open spaces and green spaces should be encouraged in the Official Plan.</p> <p>26. Do you have any other comments or information that Halton Region should consider at this time?</p> <p>Between Queen’s Park, LPAT and Committees of Adjustment, Regional and Local Municipal Official Plans and Zoning By-Laws seem to be routinely overridden. Residents are frustrated and discouraged. We expect official plans and zoning by-laws to be respected. It is most desirable that there is guidance in the updated ROP to help preserve the overall vision embodied in it and in Local Municipal Plans.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

19.	Trafalgar Ten Grain Farm	<p>Attached per email dated 2020-10-28 (Jennifer Lawrence)</p> <p>Re: Region of Halton Official Plan Review Natural Heritage Discussion Paper 9871 Trafalgar Road Part Lot 10, Concession VIII (Esquensing) Town of Halton Hills</p> <p>I have been retained by Trafalgar Ten Grain Farm Ltd. to provide professional planning advice related to the proposed natural heritage system outlined within the Natural Heritage Discussion Paper (June 2020) as it pertains to 9871 Trafalgar Road in the Town of Halton Hills (Subject Lands) .</p> <p><u>ROPA 38 Regional Natural Heritage System (RNHS)</u></p> <p>The Subject Lands are located between Trafalgar Road and Eighth Line, south of 10 Sideroad as shown on Attachment 1. These lands are used solely for agricultural purposes and are actively farmed by the owner. Portions of the Subject Lands are within the current Regional Natural Heritage System (RNHS) (Attachment 1). These areas are associate with three separate drainage features.</p> <p><u>Regional Official Plan Review Proposed RNHS</u></p> <p>Additional lands have been included in the RNHS as part of the Regional Official Plan Review (ROPR) (Attachment 2). This additional area, within the southwest corner of the property, appears to have been added as a result of Conservation Halton (CH) mapping that extended a headwater tributary of Sixteen Mile Creek northerly into the Subject Lands (Attachment 3). This has resulted in the identification of an 'NHS Key Linear Feature – River' in the southwest corner with an accompanying Linkage/Buffer/Enhancement Area surrounding the feature.</p> <p>The landowner has advised that the area identified as a watercourse in the southwest corner of the Subject Lands is fully farmed and is fully tillable in all seasons, including early spring. Based on a site visit that I undertook on October 23, 2020, as well as a review of contour mapping obtained from the Town of Halton Hills interactive mapping portal, the drainage area to this portion of the field is very limited (Attachment 4). Further, current and historic aerial photography does not reveal a defined watercourse in this location. As such, it is questionable whether the drainage area is sufficient to sustain a watercourse, as defined by Section 289.1 of the Region of Halton Official Plan and Section 28(25) of the <i>Conservation Authorities Act</i>. Specifically, both definitions for watercourse are identical and are as follows:</p> <p><i>Means an identifiable depression in the ground in which a flow of water regularly or continuously occurs.</i></p> <p>Prior to including additional lands within the RNHS on the Subject Lands, we request that Region and CH staff attend on-site to view this feature and to observe that the direction of drainage is, for the most part, northerly towards 10 Side Road and not southerly as is suggested by the ROPR RNHS mapping. The addition of lands to the RNHS brings with it associated future studies and land use restrictions that are often left to the landowner to resolve. Given these additional restrictions and potential future costs, we believe it is incumbent upon the Region and CH to undertake site inspections to verify the presence of this feature prior to changing the land use designation on this portion of the Subject Lands. This approach is in-keeping with the recommendation that the Halton Area Planning Partnership (HAPP) made to the Province during their review of the Growth Plan NHS. Specifically, in their report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping Joint Submission', dated October 2017, the HAPP states the following on page 5:</p>	<p>Regional staff has reviewed the submission made by the landowner and consultant. Regional Planning staff are in the process of completing another update of the proposed draft Natural Heritage System (NHS) mapping to capture any mapping refinements from June 2018 to June 2021. The mapping refinement process as outlined in the Natural Heritage Discussion Paper includes incorporating any updates from GIS base layer data from the Province and Conservation Authorities, OMB decisions, approved planning applications, special Council Permits, and staff refinements based on in-field observations. If the watercourse refinement as shown on the attachment dated August 2, 2021, has been captured in the CH's ARL mapping, it will get picked up as part of our current mapping update. The review and site visit for the wetland feature has been deferred at this time based on correspondence with CH.</p>
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HAPP notes limitations with this approach throughout these comments and suggests that there is no substitute for ground truthing or more detailed studies.

We concur that there is no substitute for ground truthing and request that a site meeting be scheduled this year. I would be pleased to coordinate the meeting with the appropriate staff.

Recommendation

Based on a site inspection, review of the contour mapping and current and historic aerial photography, it is respectfully recommended that the addition of lands to the RNHS within the southwest corner of the Subject Lands has not been justified. Prior to the designation of any additional RNHS lands on the Subject Lands, we request that the Region and CH attend on-site to determine whether a feature exists that meets the definition of watercourse within the Conservation Authorities Act.

I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.

Yours truly,

Jennifer Lawrence, MCIP, RPP
President

Comments are acknowledged. Please see above for a detailed response.

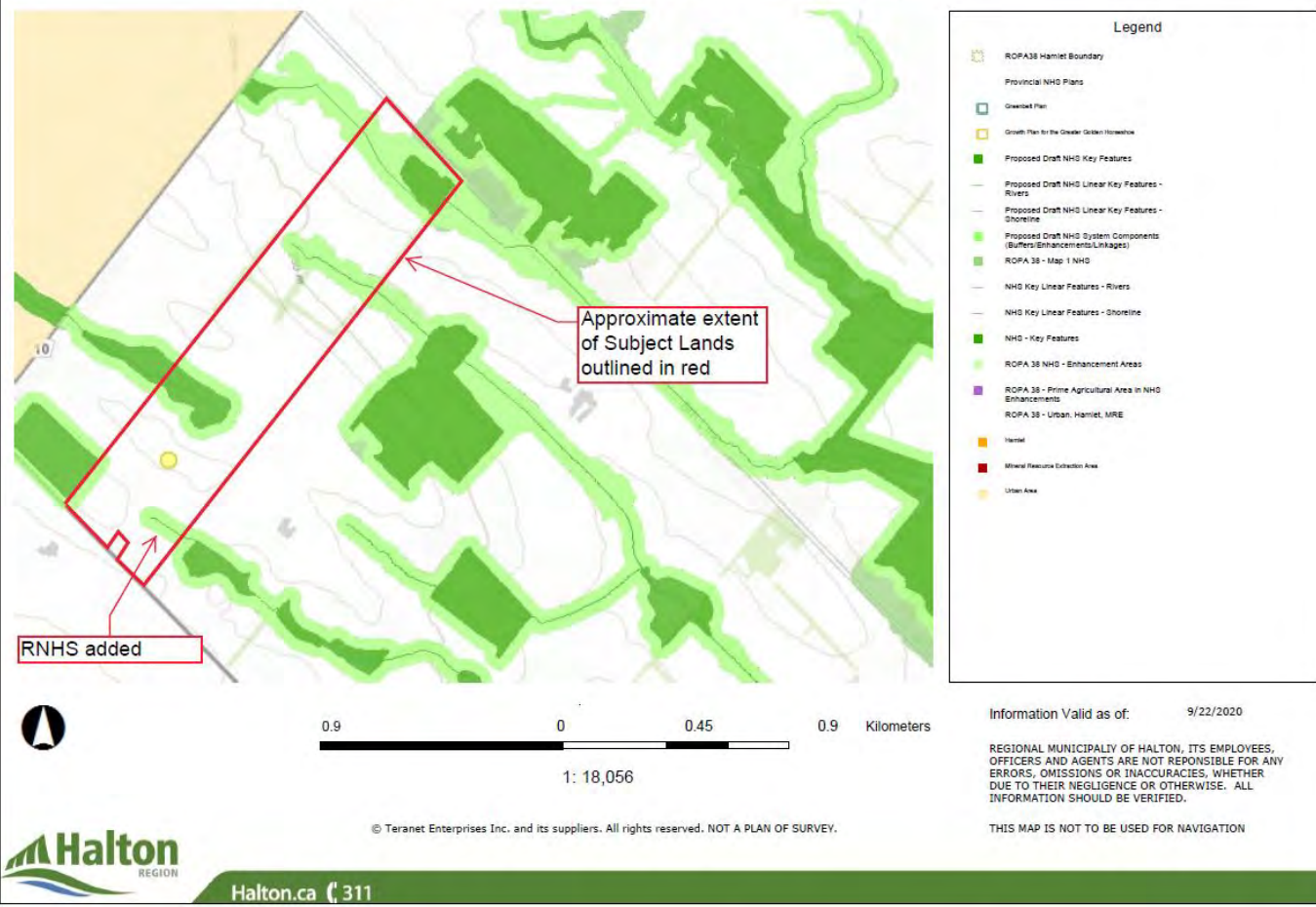
ROPA 38 RNHS - 9871 Trafalgar Road Halton Hills

Attachment 1

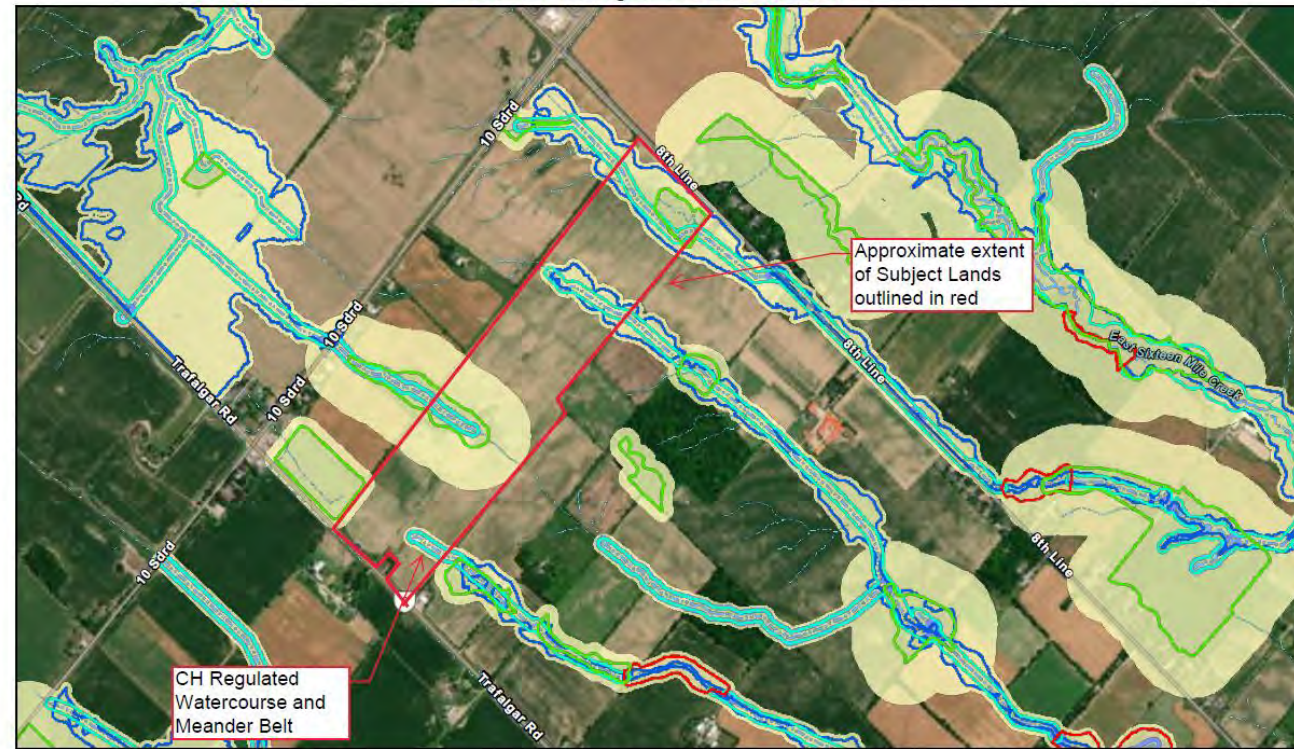


ROPR RNHS - 9871 Trafalgar Road -Halton Hills

Attachment 2



Comments are acknowledged. Please see above for a detailed response.



- 9/22/2020, 11:51:12 AM
- 100 year Flood Hazard
 - Headwater Floodplains
 - Stable Top of Bank Hazard
 - Hydrologic Connection
 - Dynamic Beach Hazard
 - Floodplains Hazard
 - Wetlands Hazard
 - Approximate Regulation Limit
 - Shoreline Hazard
 - Meander Belt Hazard
 - Waterflow
 - Conservation Halton

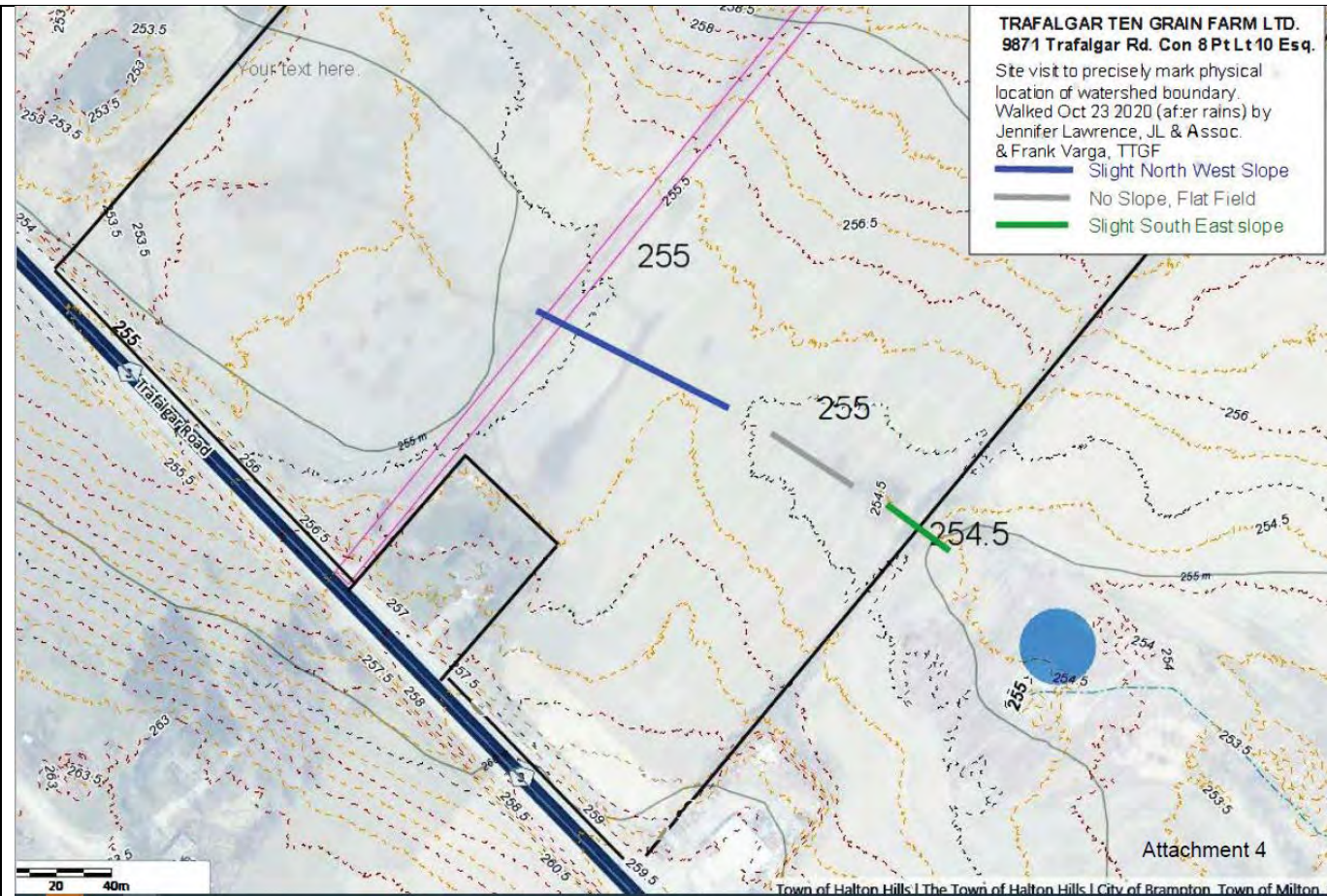
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Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, CH GIS, Created by Conservation Halton GIS, Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Conservation

Comments are acknowledged. Please see above for a detailed response.



Comments are acknowledged. Please see above for a detailed response.

Attached per above email dated 2020-11-24

**Re: 9871 Trafalgar Road
Part Lot 10, Concession VIII (Esquering)
Town of Halton Hills
Conservation Halton Regulated Area Refinement**

Thank you again for attending on-site with the Owner of Trafalgar Ten Grain Farm Ltd. (Frank Varga) and I on November 17, 2020 to review two areas on the above noted property that have been identified as regulated by Conservation Halton (CH). We requested that CH staff attend on-site to review these two areas given that recent updates to CH mapping has resulted in additional areas being included in the Region of Halton's Regional Natural Heritage System (RNHS), as part of the Region's on-going Regional Official Plan Review (ROPR) process.

The two areas, and the agreed upon next steps, are outlined below:

Drainage Feature Southwest Corner of Property

As discussed, as part of CH's recent mapping update, a drainage feature was added as a regulated watercourse, within the southwest corner of the Subject Property (**Attachment 1**). In CH's previous mapping iteration, this feature did not extend north of the southern property line and, as a result, the RNHS did not extend into the Subject Property in this area (**Attachment 2**). Based on the site inspection,

CH staff agreed that there is not a regulated watercourse within the southwest corner of the Subject Lands and indicated that they would revise their mapping such that the watercourse limit does not extend past the northern limit of the wetland on the lands to the south (located approximately 30m south of the Subject Property). This agreed to revision is illustrated on **Attachment 1**.

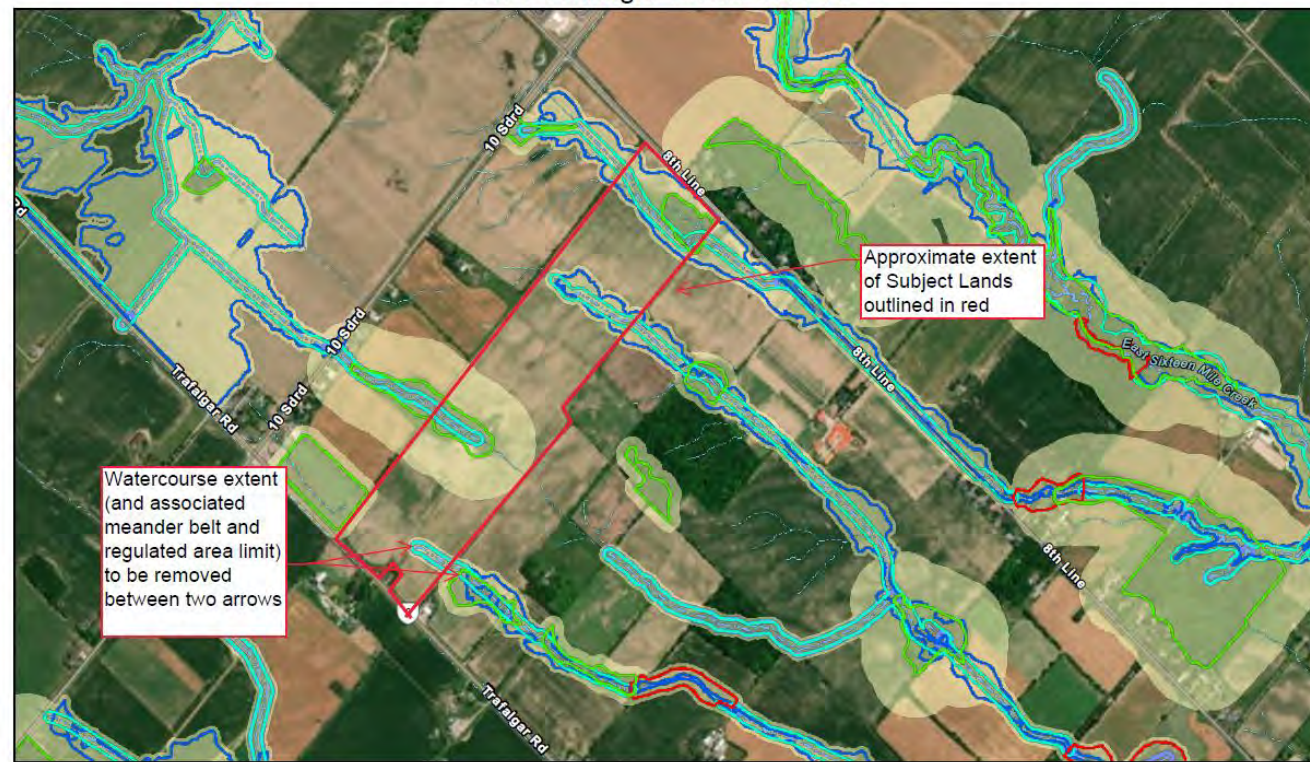
This revision should result in the Region being able to remove the RNHS in the southwestern corner of the property. As such, the Region has been copied on this memo and CH staff agreed to keep Regional staff updated on their associated mapping revision. From a ROPR perspective, the proposed deletion area is outlined and detailed on **Attachment 3**.

Wetland Feature Central Portion of Property

As shown on **Attachment 4** there is a wetland within this portion of the Subject Property that is within the Region's current RNHS. However, as discussed on-site, the extent of the wetland has been increased as part of CH's recent mapping update, resulting in a larger area identified as Key Feature within the Region's proposed RNHS. **Attachment 4** identifies the previous Key Feature extent, attributed to this wetland feature, as compared to the new, larger Key Feature extent attributed to this feature. As observed onsite, the enlarged wetland area, as shown in CH's updated mapping does not appear to be consistent with the actual extent of the feature. CH staff committed to discussing this with CH staff (L. Matich) who is responsible for the wetland mapping and to provide us with an update on the decision such that any corrections to the wetland extent can be incorporated into the Region's RNHS mapping.

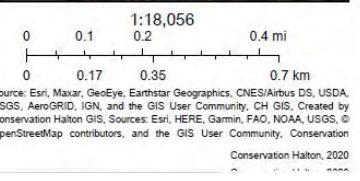
9871 Trafalgar Road CH ARL

Attachment 1



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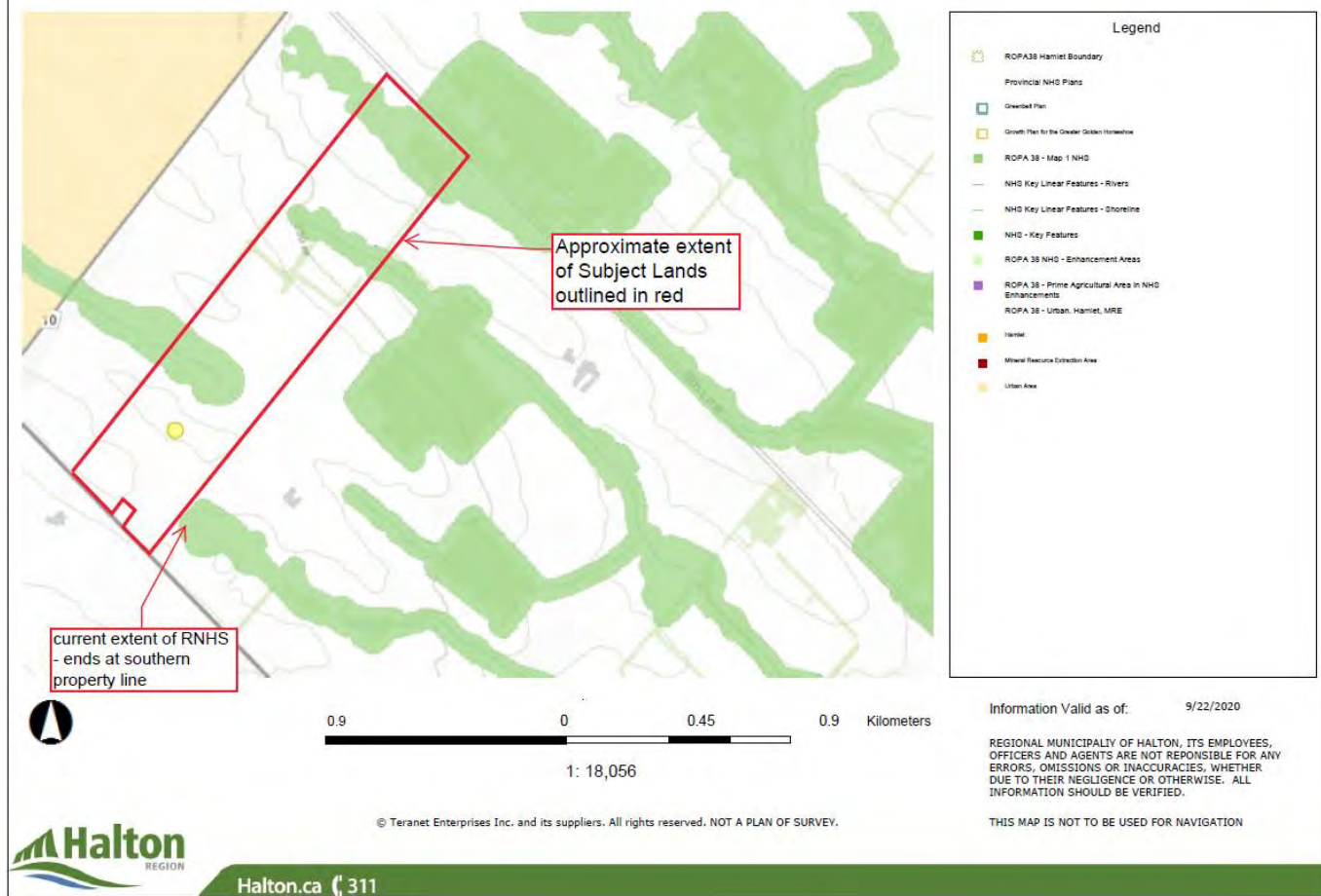
- 100 year Flood Hazard
- Headwater Floodplains
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- Floodplains Hazard
- Wetlands Hazard
- Approximate Regulation Limit
- Shoreline Hazard
- Meander Belt Hazard
- Waterflow
- Conservation Halton
- Regulated



Comments are acknowledged. Please see above for a detailed response.

ROPA 38 RNHS - 9871 Trafalgar Road Halton Hills

Attachment 2



Comments are acknowledged. Please see above for a detailed response.

Review of the Regional Official Plan Natural Heritage System Policies and Mapping
Natural Heritage Report

Attachment 3

Figure 9: 2009 Natural Heritage System vs. Draft 2019 Natural Heritage System Comparison – additions shown



Comments are acknowledged. Please see above for a detailed response.

Aerial Map B

Trafalgar Ten Grain Farm Ltd
9871 Trafalgar Rd, Con 8 Part Lot 10 Esq

Candidate Areas to be removed from Proposed Draft NHS Key Features

ROPA 38 Map 1G

Proposed Draft NHS Key Features

Email dated 2021-08-03

Good Morning Heather,

I hope you had a great long weekend!

I'm following up on some correspondence that we had with Charles and Ben at CH at the end of 2020 related to an area in the southwest corner of the above noted property that was shown as regulated by CH. As outlined in Ben's email below, CH staff confirmed, after a site visit, that the southwest portion of the property did not warrant regulation and committed to updating CH's mapping layer accordingly. I have attached a copy of CH's online mapping before (pdf titled Attach 1 CH Online ARL) and after (pdf titled CH Online Mapping Aug 2 21 JL) that site visit to confirm that CH has revised their mapping. As the Region's proposed RNHS mapping was using CH's data in this location, can you please confirm that the proposed RNHS in this location has also been modified accordingly?

Thank you,

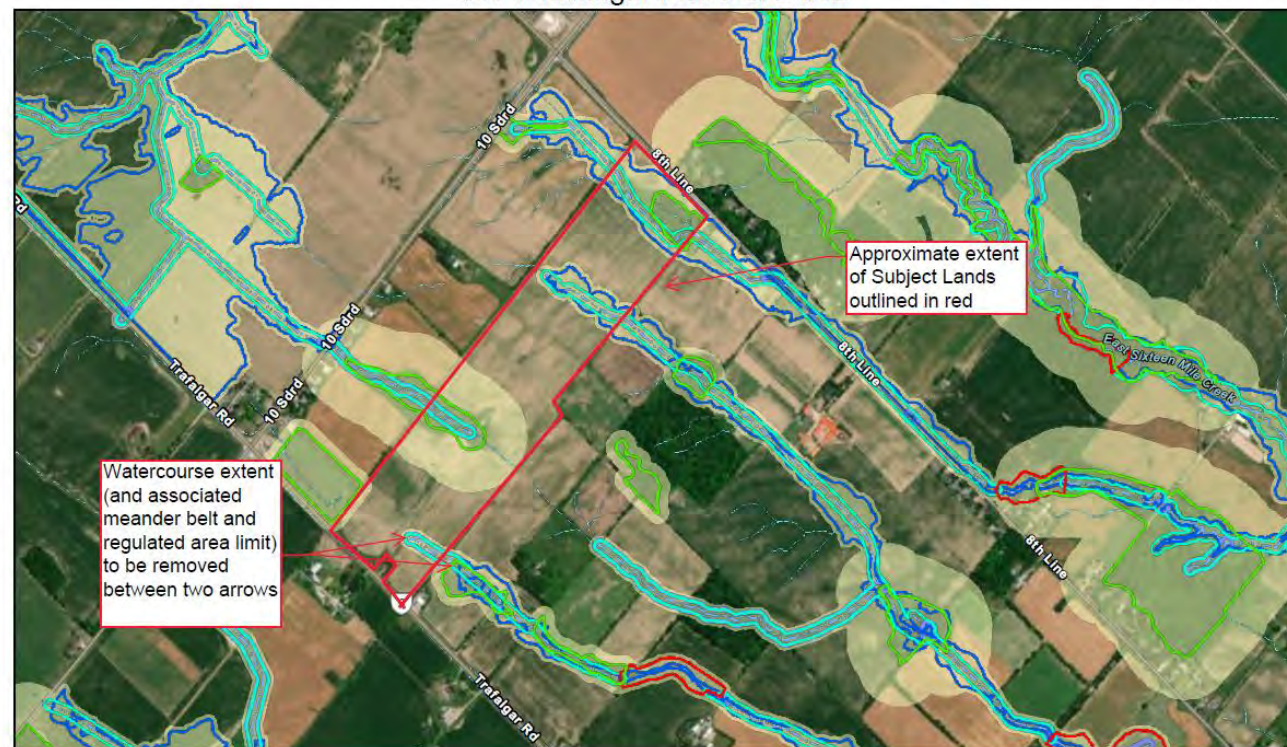
Jennifer

Attached per above email dated 2021-08-03

Comments are acknowledged. Please see above for a detailed response.

9871 Trafalgar Road CH ARL

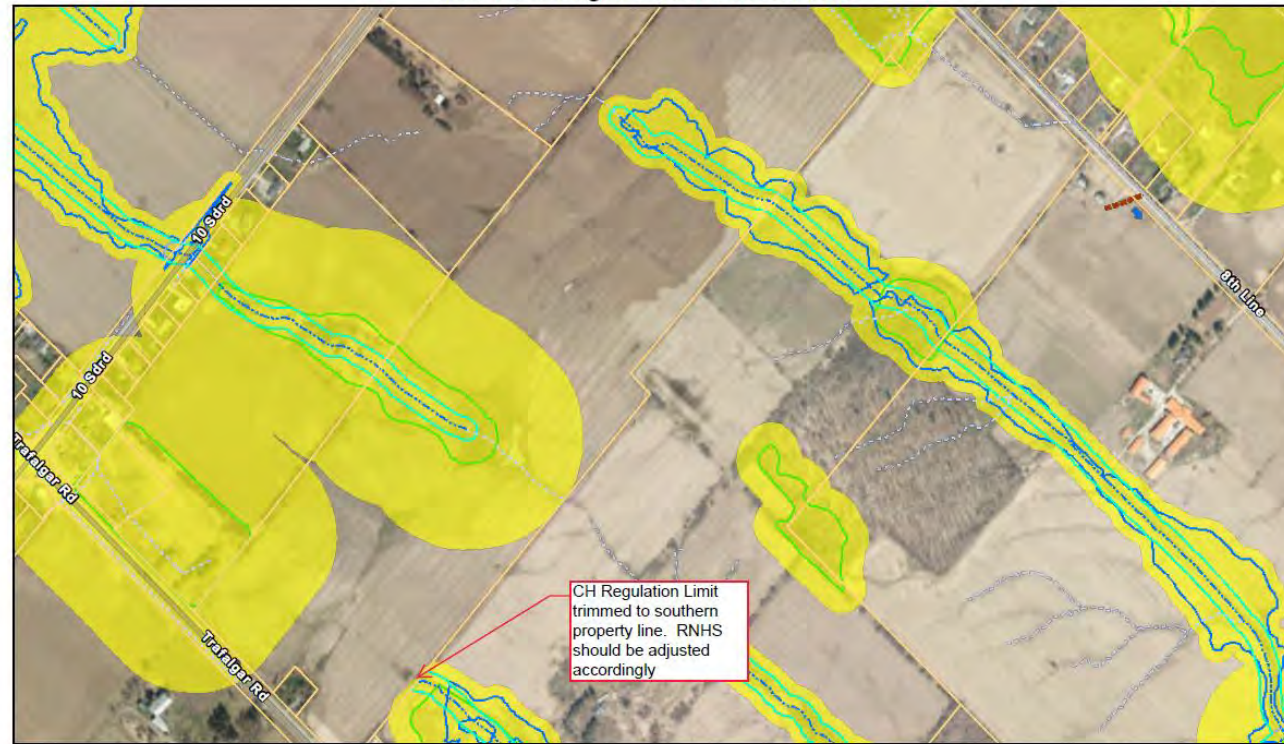
Attachment 1



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| 100 year Flood Hazard | Headwater Floodplains | Stable Top of Bank Hazard | Hydrologic Connection |
| Dynamic Beach Hazard | Floodplains Hazard | Wetlands Hazard | Approximate Regulation Limit |
| Shoreline Hazard | Meander Belt Hazard | Waterflow | Conservation Halton |
| | Regulated | | |

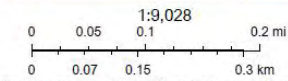
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Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, CH GIS, Created by Conservation Halton GIS, Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Conservation Halton, 2020
Conservation Halton, 2020
Conservation Halton, 2020

9871 Trafalgar Road Halton Hills



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| Parcels | Shoreline Hazard | Floodplains Hazard | Spill Arrows |
| Approximate Regulation Limit | Stable Top of Bank (STOB) Hazard | Headwater Floodplain Hazard | Spill Lines |
| Shoreline 100 year Flood Elevation Hazard | Wetland Hazard | Meander Belt Hazard | |
| Shoreline Dynamic Beach Hazard | Spill Zones Hazard | Consult Conservation Halton | |



City of Brampton, Town of Oakville, Maxar, Esri Community Maps Contributors, Province of Ontario, Esri Canada, Esri, HERE, Garmin, INCREMENT P, METU, NASA, USGS, EPA, NPS, US Census Bureau, USDA, NRCAN, Parks Canada, Conservation Halton, 2021, Conservation Halton

Conservation Halton, 2021
Conservation Halton, 2021

Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
20.	Halton Environmental Network	<p>Attached per email dated 2020-10-29 (Lisa Kohler)</p> <p>HALTON REGION OP REVIEW PHASE 2 - Halton Environmental Network- Official Comments</p> <p>CLIMATE CHANGE PAPER – Climate Action submission, October 2020</p> <p>1. Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?</p> <p>As part of our daily work we have multiple examples of Climate Change in our community. We know it is getting windier, wilder, and wetter. We have seen flooding on the lakefront of Oakville, costing our community millions of dollars. In Burlington, one rain effect impacted hundreds of residents with flooded basements and roads. Ice storms and wind events impact large trees and power lines, sometimes resulting in power outages. These power outages impact the most vulnerable people in our community, causing challenges in their day-to-day lives. Extreme heat events have been on the increase, which again impact the most vulnerable people in our community. We have heard from the agricultural communities about drought, dry spells and then flooding in their fields. We have also seen the migration of vector-borne diseases, such as West Nile and Lyme disease due to our warmer and wetter climate. The impacts of climate are being felt in community. We have attached a map that documents some of the impacts. The Towns of Halton Hills, Oakville, and Burlington have highlighted these challenges on their websites and in communications, and all these communities are updating their risk assessment. ICLEI’s Showcase Cities pilot program provides an in-depth look at the risks posed to the Town of Oakville and City of Burlington highlighting a wide range of climate change related weather https://icleicanada.org/project/gcom-and-showcase-cities-project/.</p> <p>The Canadian government also has great resources documenting the impact for our community. Documenting changes in the Great lakes water levels, with implications for water management, hydro generation, transportation, and ecosystem sustainability. Other issues they have highlighted are extreme weather events and the impacts on our infrastructure, our health and agriculture. Please review this site for more details: https://www.nrcan.gc.ca/environment/resources/publications/impacts-adaptation/reports/assessments/2008/ch6/10363</p> <p>We also want to highlight the Lancet report. We had the pleasure of attending the 2019 Canadian launch of the report with the CMA, Emergency Room physicians, epidemiologists and others and this report highlights all impacts: https://www.cma.ca/2019-lancet-countdown-health-and-climate-change-policy-brief-canada</p> <p>The Region of Peel also has a transformative master plan highlighting challenges and opportunities - this document must be reviewed by our Region to ensure we are not spending dollars and time on duplication. Instead, by leveraging this research, we can replicate and implement solutions efficiently: https://www.peelregion.ca/climate-energy/pdf/Climate-Change-Plan.pdf</p> <p>2. How do you think the Regional Official Plan can help Halton respond to climate change? What mitigation and adaptation actions would you like to see embedded in the Regional Official Plan? For more information on this topic, please see pages 16-21 of the Climate Change Discussion Paper.</p>	<p>The Climate Change Policy Direction (CC-5) provides a recommendation to introduce new policies in the Regional Official Plan that encourage the local municipalities to introduce and/or enhance Green Development Standards for new developments. The Region will provide the local municipalities with best practices to assist with the implementation of Green Development Standards and potentially provide some consistency, efficiency, and equity.</p> <p>Further policies directions aim to introduce a supportive policy framework for local energy planning (CC-6), require the Region and its local municipalities to assess infrastructure risk and vulnerabilities and identify actions to address these challenges (CC-4), and other policy that integrates climate change considerations in the Regional Official Plan. A policy direction (CC-1) intends to comprehensively review the policy sections of each area of the entire ROP and look for all climate change challenges and opportunities. More fulsome details are available in the Policy Directions Report that describes climate change policy directions.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region’s Strategic Business Plan 2019-2022 and Council’s emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region’s work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>

No.	Source	Submission	Response
		<p>We know there are great opportunities within our community to mitigate and adapt to our changing climate. We need a Regional approach to addressing climate change that is cohesive, succinct, and holistic. We also need a Regional approach that supports all lower tier municipalities, aligning the work, looking for best practice and replicating advantageous programs to improve efficiency and effectiveness, to amplify and accelerate positive outcomes.</p> <p>Having Green Development Standards (GDS) would support the Regional Official Plan (ROP) and the work in the municipalities. Creating and implementing a Regional GDS would ensure consistency, efficiency and equity. GDS are a policy tool for municipalities to achieve their GHG reduction targets, ensure their Official Plan goals, as well as goals in many areas of sustainability and climate change. By having a GDS within the ROP we could not only respond to climate change, but also address numerous environmental challenges and opportunities. GDS provides a range of benefits that impact community members over multiple generations by creating healthy, complete, and sustainable communities that offer residents a high-quality of life. GDS are comprehensive principles to guide development at a level of planning and design that focuses on the community as a whole, which would support the OP.</p> <p>We need to review the policy sections of each area of the entire ROP, looking for all climate change challenges and opportunities. We need a comprehensive strategy that will support green infrastructure and growth and set us up for outside funding opportunities to support our unified plans. Growth Management, Transportation, Energy & Utilities, Agriculture and Natural Heritage & Environmental Quality, all would be beneficial if climate change had its own section that would allow for the inclusion of a general explanation, objectives, overarching guiding policies and statements on how the other areas outlined above connect.</p> <p>While there is overlap between mitigation and adaptation efforts, recommendations are divided as follows:</p> <p>Mitigation</p> <p>Coordinate with and support municipalities to meet local GHG targets.</p> <p>Require a Regional level community energy plan including inventory, targets and mitigation plan for GHG emissions, to be coordinated with the municipalities and report back annually.</p> <p>Require a climate lens (high level assessment of climate impacts and options for mitigating impacts) to be applied to infrastructure, including a requirement for risk and vulnerability assessments to identify risks and options for enhancing infrastructure resilience.</p> <p>Requirement for a climate lens to be applied to development review and demonstrate how climate change is being addressed (required study/statement as part of a complete development application).</p> <p>Direction to support climate change planning through collaborative partnerships with all levels of government, as well as public and private organizations, and non-governmental organizations. These Partnerships should be explored and developed, an example would be the Oakville Energy Taskforce with members like Ford Canada, Hatch, Mattamy, Halton Environmental Network, Halton District School Board, The Region of Halton, Community Members etc.</p> <p>Encourage agricultural efforts to support mitigation, and explore opportunities to embed additional mitigation efforts with the local agricultural community.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Encourage more effective waste diversion and waste diversion education. This should include a food waste policy and education plan.</p> <p>Encourage and explore the identification and implementation of energy from waste technologies (e.g. methane capture, gasification, anaerobic digestion) to recover resources from waste.</p> <p>Support the adaptive reuse of existing building stock and encourage the reuse/recycling of building materials in the development process.</p> <p>Adaptation</p> <p>Consider including a policy to support work on climate change decision-support tools including collaborating further with Regional partners to build information and predict likely impacts for Halton (e.g. GHG emission reduction plans, risk and vulnerability assessments, feasibility of renewable and alternative energy systems and mapping, scenario planning, and projections).</p> <p>Look to the agricultural community to support adaptation efforts.</p> <p>Review Regional assets that could not only mitigate GHG but support adaptation efforts such as green infrastructure.</p> <p>Support comprehensive stormwater management planning, including low-impact development and green infrastructure, to increase community resilience to extreme weather.</p> <p>Consider the location and design of Regional human services facilities, including those related to communications, energy, and water infrastructure, to minimize vulnerabilities related to a changing climate.</p> <p>Ensure the Regional health department is engaged in climate change. Create educational experiences for the Regional Health department staff, local physicians, and Hospital staff to understand, treat, and track the local health impacts of climate change. By creating a local inventory, we can create a plan to ensure a resilient community, prepared to respond and adapt to the impact of climate change on our health systems.</p> <p>3. Halton’s population is forecast to grow to one million people and accommodate 470,000 jobs by 2041. What do you think about policies to plan for climate change through more compact urban form and complete communities? In your opinion, are we growing in the right direction? For more information on this topic, please see pages 21-25 of the Climate Change Discussion Paper.</p> <p>Hard urban boundaries between urban and rural areas are needed.</p> <p>Compact urban form and complete communities are at the core of land use planning policies that support addressing climate change. We would point out that although intensification is critical to creating efficient, resilient and sustainable communities, this needs to be balanced by ensuring there is appropriate greenspace not only outside of the built environment but within it. The introduction of green infrastructure policies into the ROP would acknowledge the importance of healthy natural systems that function at multiple levels within the community that support climate resiliency including services such as stormwater</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

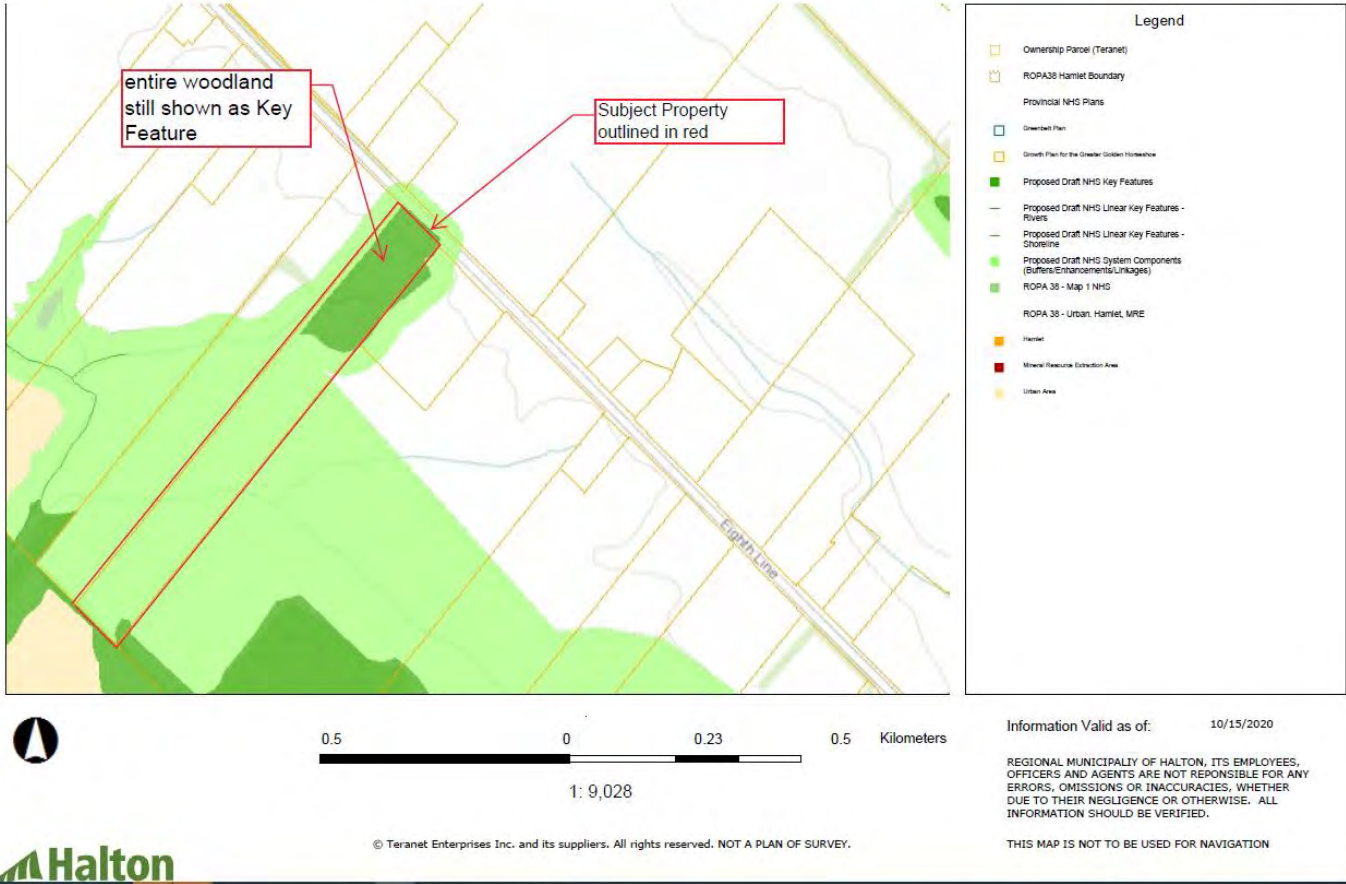
No.	Source	Submission	Response
		<p>management, carbon sinks, soil stabilization, management of air pollution management and mitigating urban heat island effects.</p> <p>For new developments, GDS would support comprehensive policy that are easily understood, governed and implemented - policies that encourage municipalities to require planning studies specific to climate change mitigation and impacts (e.g. energy plans, GHG impacts, green infrastructure opportunities, etc.). These could be incorporated as part of a climate lens or sustainable development standards at a neighborhood and/or subdivision level.</p> <p>4. What do you think the Region should do to help you reduce your greenhouse gas emissions? For example, if you typically commute by car to work or school every day, what would make you consider taking transit, biking or walking? For more information on this topic, please see page 21-27 of the Climate Change Discussion Paper.</p> <p>Require all municipalities and the Region of Halton to have climate action plans in place to demonstrate how they will address both mitigation and adaptation plans for climate change at the local level.</p> <p>Enabling and supportive policies for electric vehicle (EV) infrastructure and encouraging EV stations in new developments.</p> <p>Support the electrification of public transportation systems.</p> <p>Support the development of comprehensive cycling infrastructure and pedestrian pathways for safe and accessible active transportation.</p> <p>Support retrofitting and enhancements to existing building stock to enhance energy efficiency.</p> <p>Support and encourage green development standards (GDS) and encourage municipalities to include GDS in local level plans. There would be value in having a harmonized, though not one-size-fits-all, approach to green standards across the Region and the local municipalities. There is an opportunity for some coordination at a Regional level through its OP policies.</p> <p>Support requirement of energy master plans for all major developments and encourage near Net Zero development. This could be integrated as part of GDS encouraging and coordinating local level sustainable development.</p> <p>We would encourage a review of the Town of Oakville’s recent “Community Energy Strategy” (CES) https://www.oakville.ca/assets/general%20-%20environment/Community-Energy-Strategy.pdf that was developed by a community-based task force that outlines priority projects that will be pursued to reduce energy use and decrease GHG emissions. Having Regional policies in place, that encourage and support implementation of these projects, will be valuable to ensure successful implementation.</p> <p>5. Do you think the Region should encourage and support local renewable energy sources? If so, what should be considered? For more information on this topic, please see pages 28-29 of the Climate Change Discussion Paper.</p> <p>Yes, the Region should encourage and support a local effort for renewable energy sources. The Region has assets such as the Regional Landfill that could be a great source of renewable energy.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Looking at district energy plans, both micro and macro, would be a good role for the Region, and ensure a collective, responsive alignment of all municipalities to make sure renewable sources are explored for Regional benefits.</p> <p>Outline how the Region will work collaboratively with local municipalities to support community and Regional energy planning. Encourage the integration of energy planning and design in the development patterns of communities. Some examples of this collective work:</p> <ul style="list-style-type: none"> • Encourage adoption of GDS by the local municipalities and provide coordination outlining key areas to be addressed such as linking to district energy, energy efficiency in new developments (e.g. green/white roofs), low-impact development stormwater management. • Developing greater efficiency in delivering energy. Policies should be included that are enabling and supportive of small-scale energy infrastructure (such as district energy systems), particularly in urban growth areas. The Region could consider encouraging the mapping/identification of land use areas that would support district energy systems. • Support comprehensive community energy planning at the Region and by local municipalities • Support clustering of community facilities and infrastructure that would support improved efficiency in both use of space from a community perspective (acting as community hubs in times of need for weather related emergencies) and for district energy opportunities. • Ensuring policies that enable and support the production of local renewable energy sources (solar, geothermal) are strongly encouraged as a means to help mitigate climate change. <p>6. Can you provide examples of opportunities to address climate change as it relates to agriculture that you would like to see in Halton? For more information on this topic, please see pages 29-30 of the Climate Change Discussion Paper.</p> <p>Promote the importance of locally produced products and the agri-food sector for food security.</p> <p>Support the use of environmental farm management plans and encourage the application of low carbon and sustainable soil farming practices.</p> <p>Ensure there is opportunity for the exploration of the value of GHG sequestration from local farms and urban agriculture.</p> <p>Support studies on the sequestration values of the agri-sector, including soil, etc. Look for carbon offsets to support and ensure the sector has fair value.</p> <p>Encourage local agricultural efforts to support mitigation, and explore opportunities to embed additional mitigation efforts with the local agricultural community.</p> <p>Encourage plant-based urban agriculture opportunities within the urban boundary as a source of local food security and to assist in reducing GHGs through its role in carbon capture (for example, see https://www.sciencedirect.com/science/article/pii/S0169204615000663)</p> <p>7. According to the Provincial Policy Statement, planning authorities are required to consider the potential impacts of climate change in increasing risks associated with natural hazards (e.g., fires and floods). How can Regional Official Plan policies be enhanced to address climate change</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

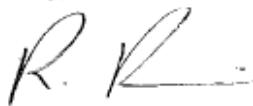
No.	Source	Submission	Response
		<p>impacts on natural hazards? For more information on this topic, please see pages 30-32 of the Climate Change Discussion Paper.</p> <p>Include policies that define green infrastructure and the role it plays in both mitigating and adapting the effects of climate change. Having a Regional GDS would address potential impacts and support the mitigation of climate risk. Green Infrastructure Ontario (GIO) provides resources around land use planning and policies while York, Waterloo and Peel have all included this in their Official Plans.</p> <p>Identify Regional level green infrastructure systems and encourage local municipalities to conduct an inventory/assessment at a local level.</p> <p>Require watershed and subwatershed studies and plans to specifically address climate change and extreme weather.</p> <p>Require the implementation of low impact development and green infrastructure stormwater management practices in accordance with provincial requirements and guidelines.</p> <p>Encourage and support the use of GDS to promote sustainable development and building practices including objectives and metrics related to extreme weather and climate change adaptation.</p> <p>Encourage and support the use of new Municipal Act and Planning Act tools for climate change (e.g. Climate Change By-laws requiring green roofs and/or alternative building standards).</p> <p>8. Are there additional measures the Regional Official Plan should include to improve air quality? For more information on this topic, please see page 32 of the Climate Change Discussion Paper.</p> <p>Local air quality is largely impacted by transboundary pollution and therefore out of the control of local governments. There could be policies supporting collaboration with other levels of government to advocate and support solutions at provincial, federal and/or trans-national levels. Local level sources of air pollution in Halton are primarily generated through transportation and heating/cooling of buildings. Policy areas that cover compact communities, transit supportive densities, efficiency of buildings and active transportation are in place and could be acknowledged for their role in supporting local air quality improvement.</p> <p>Support integration and implementation of Active Transportation master plans between the Region and local municipalities. Expand the plans to include movement of goods in addition to people.</p> <p>Develop an air quality management plan for the Region, in collaboration with the local municipalities, that includes monitoring and reporting of air quality and GHG emissions on a regular basis</p> <p>It may be of interest to look at the Peel Air Quality Discussion Paper and their 2017 Air Quality Modeling staff report.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
21.	Mr. and Mrs. Hans	<p>Attached per email dated 2020-10-29 (Jennifer Lawrence)</p> <p>Dear Mr. Benson:</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper</p>	<p>Regional staff had reviewed the submission, including the recommendation that the Region refines the extent of the Key Feature on the Subject Lands, closest to 0 8th Line, such that the Key Feature Limit only follows the extent of Conservation Halton's regulated wetland. Regional staff confirmed that the Key Feature on Subject Lands is a wetland regulated by Conservation Halton (CH). The Key</p>

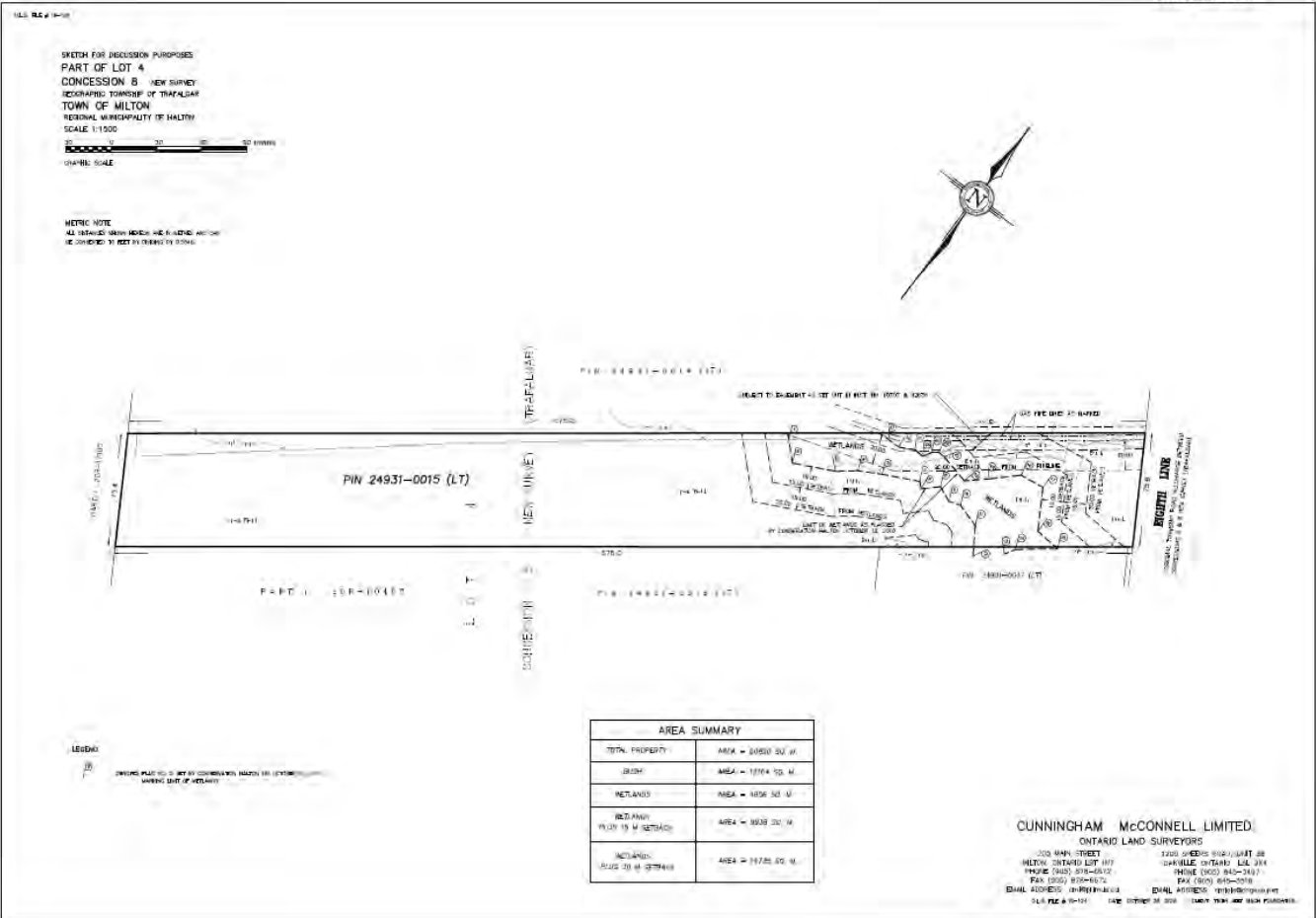
No.	Source	Submission	Response
		<p>0 8th Line Town of Milton</p> <p>I have been retained by Mr. and Mrs. Hans to provide professional planning advice related to the proposed natural heritage system outlined within the Natural Heritage Discussion Paper (June 2020) as it pertains to their property at 0 8th Line in the Town of Milton (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p> <p>The Subject Lands are located on the west side of 8th Line, south of Britannia Road in the Town of Milton as shown on Attachment 1. The property is used for agricultural purposes and there is currently no residence or other structures on the property. The ROPA 38 RNHS limits on the Subject Lands include a wooded area and wetland near 8th Line, a small portion of a wetland at the rear of the property and a substantial linkage/enhancement area through the western portion of the Subject Lands.</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The proposed RNHS limits remain unchanged from those as shown in the ROPA 38 RNHS (Attachment 2) however, through a Conservation Halton (CH) Permit application and correspondence with the Region's Forester in 2018, it was confirmed that the feature closest to 8th Line does not meet the Region's definition for woodland and, as such, that portion of the Key Feature mapping on the Subject Lands should be refined to only reflect the wetland limits. A copy of correspondence from the Region's Forester is attached (Attachment 3). In addition, a copy of the surveyed wetland limits, in pdf and CAD, is included for your use in refining the limit of the Key Feature (Attachment 4). As part of the CH Permit approval (Permit #5806, issued January 15, 2018), there was a requirement to create an area of wetland to compensate for the area that was removed to construct the driveway. The extent of that compensation area is shown on Attachment 5 and would be included as part of the Key Feature.</p> <p><u>Recommendation</u></p> <p>It is respectfully recommended that the Region refine the extent of the Key Feature on the Subject Lands, closest to 8th Line, such that the Key Feature limit only follows the extent of CH's regulated wetland given that the Region has confirmed the remainder of the feature does not meet the definition of woodland.</p> <p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly, Jennifer Lawrence, MCIP, RPP President</p>	<p>Feature on the Subject Lands is not considered a woodland in accordance with a previous Woodland Assessment conducted by the Regional Forester (Attachment 3 in the letter dated October 29, 2020, as attached to this email). Given that the wetland is within CH's regulatory jurisdiction, CH's regulation mapping would need to be updated to reflect the accurate limits of the wetland based on CH's permit. Based on correspondence with CH, the mapping update will be completed and therefore, reflected in the next update to the draft proposed RNHS mapping as part of, Phase 3 of the ROPR. Detailed e-mail correspondence can be provided upon request.</p>

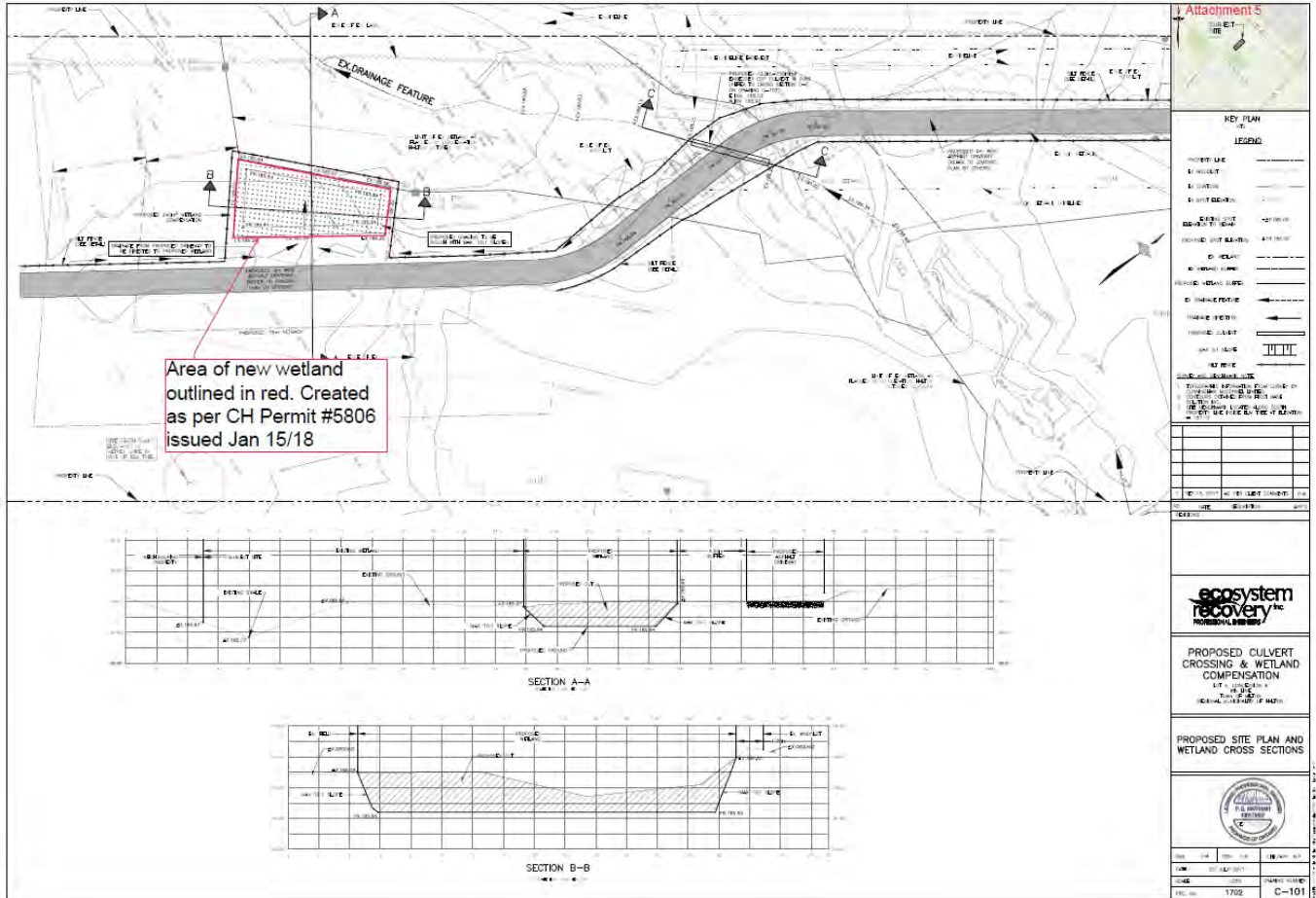
No.	Source	Submission	Response
		<p style="text-align: center;">Halton ROPA 38 NHS - Singh Property 8th Line Milton Attachment 1</p>  <p>The map displays the Singh Property outlined in red, situated within the ROPA 38 NHS area. The legend identifies various features including Ownership Parcel (Teranet), Provincial NHS Plans, NHS Key Linear Features (Rivers and Shoreline), NHS Key Features, ROPA 38 NHS Enhancement Areas, ROPA 38 Prime Agricultural Area in NHS Enhancements, ROPA 38 Urban, Hamlet, MRE, Hamlet, Mineral Resource Extraction Area, and Urban Area. A scale bar indicates 0.5, 0, 0.23, and 0.5 Kilometers, with a scale of 1:9,028. The map is dated 10/26/2020 and includes a disclaimer: 'REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED. THIS MAP IS NOT TO BE USED FOR NAVIGATION.'</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">Halton ROPR RNHS - Singh Property 8th Line Milton Attachment 2</p>  <p>entire woodland still shown as Key Feature</p> <p>Subject Property outlined in red</p> <p>Legend</p> <ul style="list-style-type: none"> Ownership Parcel (Teranet) ROPA36 Hamlet Boundary Provincial NHD Plans Ownership Plan Growth Plan for the Greater Golden Horseshoe Proposed Draft NHD Key Features Proposed Draft NHD Linear Key Features - Rivers Proposed Draft NHD Linear Key Features - Shoreline Proposed Draft NHD System Components (Buffers/Enhancements/Linkages) ROPA 36 - Map 1 NHD ROPA 36 - Urban, Hamlet, MRE Hamlet Mineral Resource Extraction Area Urban Area <p>Information Valid as of: 10/15/2020</p> <p>REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED.</p> <p>THIS MAP IS NOT TO BE USED FOR NAVIGATION</p> <p>© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response																																								
		<p style="text-align: right;">Attachment 3</p>  <p>June 20, 2017</p> <p>Jagjit Hans & Sukhjit Hans 98 Peru Road Milton, ON L9T 2W2</p> <p style="text-align: right;">Legislative & Planning Services Department Legal Services 1151 Bronte Road Oakville ON L6M 3L1</p> <p>Dear Mr. and Mrs. Hans:</p> <p>RE: Woodland Assessment Part Lot 4 Concession 8, "0" 8th Line Town of Milton</p> <p>Halton Regional staff understand that you propose to remove wooded area within your property in order to install a driveway into a proposed single family dwelling. Staff understand the dwelling will be located within an open untreed area. We are in receipt of the following documents in support of your application:</p> <ol style="list-style-type: none"> 1. Halton Tree Cutting By-law Exemption Request for "0" 8th Line Town of Milton dated January 18, 2017, by Jennifer Lawrence & Associates 2. Forest Assessment, "0" 8th Line Milton, Ontario by Kuntz Forestry Consulting Inc. dated November 30, 2016 (Report); 3. Current abstract for the property; and, 4. Affidavit prepared by Mr. Harpeet K. Hans, May 15, 2017. <p>Halton Region has a Tree By-law No. 121-05 (the By-Law) which regulates tree removal within Woodlands and Greenlands. In order to assess your proposal, staff carried out a full review of your documentation and conducted a field assessment of the property on November 30, 2016 and provide our determination in the following table. Refer to Figure 1 for the below assessment.</p> <table border="1" data-bbox="789 1292 1787 1578"> <thead> <tr> <th>Compartment</th> <th>Area (ha)</th> <th>Past Use</th> <th>Evidence Provided</th> <th>Staff Determination</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0.36</td> <td>nursery</td> <td>Report/Affidavit</td> <td>Non-regulated</td> </tr> <tr> <td>2</td> <td>0.05</td> <td>nursery</td> <td>Report/Affidavit</td> <td>Non-regulated</td> </tr> <tr> <td>3</td> <td>0.08</td> <td>Woodland</td> <td>Report</td> <td>Regulated</td> </tr> <tr> <td>4</td> <td>0.05</td> <td>Woodland</td> <td>Report</td> <td>Regulated</td> </tr> <tr> <td>5</td> <td>0.12</td> <td>nursery</td> <td>Report/Affidavit</td> <td>Non-regulated</td> </tr> <tr> <td>6</td> <td>0.30</td> <td>nursery</td> <td>Report/Affidavit</td> <td>Non-regulated</td> </tr> <tr> <td>Total Woodland Area (Comp. 3 & 4)</td> <td>0.13</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>In summary, we are confident that the documentation provided has demonstrated that Compartments 1, 2, 5, and 6 are or have been established for tree nursery production and are</p> <p style="text-align: center;">The Regional Municipality of Halton</p> <p>HEAD OFFICE 1151 Bronte Road, Oakville, Ontario L6M 3L1 • Tel: 905-825-6000 • Toll Free: 1-866-442-5866 • TTY: 905-827-9833 • www.halton.ca</p>	Compartment	Area (ha)	Past Use	Evidence Provided	Staff Determination	1	0.36	nursery	Report/Affidavit	Non-regulated	2	0.05	nursery	Report/Affidavit	Non-regulated	3	0.08	Woodland	Report	Regulated	4	0.05	Woodland	Report	Regulated	5	0.12	nursery	Report/Affidavit	Non-regulated	6	0.30	nursery	Report/Affidavit	Non-regulated	Total Woodland Area (Comp. 3 & 4)	0.13				<p>Comments are acknowledged. Please see above for a detailed response.</p>
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No.	Source	Submission	Response
		<p>Page 2</p> <p>therefore not considered <i>Woodland</i> as per Section 1 (w) b) iv. of the By-law. Compartments 3 and 4 are contiguous wooded areas which meet the minimum woodland density requirements however, the total area of these two compartments of 0.13 ha does not meet the minimum <i>Woodland</i> size of 0.5ha. Therefore, the treed area on this lot (and including adjacent lands) do not meet the definition of <i>Woodland</i> as per the By-Law and are therefore not regulated.</p> <p>We are aware that the Conservation Halton (CH) regulated area applies to the property which requires the owner to obtain a permit from CH for the development as proposed.</p> <p>Prior to any tree removal operations please notify me of the following:</p> <ul style="list-style-type: none"> • Anticipated commencement date and expected duration of the operations; • Equipment to be utilized for the operations; • Contractor(s) information and supervisor of operations; and, • Site manager contact information. <p>If you have any further questions please do not hesitate to call me.</p> <p>Sincerely,</p>  <p>Ron Reinholt, R.P.F. Regional Forester ext. 7279 ron.reinholt@halton.ca</p> <p>Copy Jennifer Lawrence Gena Ali, Halton Region</p> <p>Encl.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


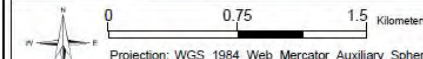
No.	Source	Submission	Response												
		<p style="text-align: right;">Attachment 4</p>  <p>SKETCH FOR CONCESSION PURPOSES PART OF LOT 4 CONCESSION B NEW SURVEY ACCORDING TO THE ACT OF 1867 TOWN OF MILTON REGIONAL MUNICIPALITY OF HALTON SCALE 1:1500 UNITS: METERS</p> <p>METRIC NOTE ALL DISTANCES GIVEN HEREON ARE IN METERS AND DECIMALS THEREOF AND ARE TO BE TAKEN AS SUCH UNLESS OTHERWISE SPECIFIED</p> <p>AREA SUMMARY</p> <table border="1" data-bbox="1236 973 1448 1130"> <thead> <tr> <th colspan="2">AREA SUMMARY</th> </tr> </thead> <tbody> <tr> <td>TOTAL PROPERTY</td> <td>AREA = 24950 SQ. M.</td> </tr> <tr> <td>LOT 4</td> <td>AREA = 10374 SQ. M.</td> </tr> <tr> <td>NETLANDS</td> <td>AREA = 18336 SQ. M.</td> </tr> <tr> <td>NETLANDS PLUS 15 M. STRIP</td> <td>AREA = 30339 SQ. M.</td> </tr> <tr> <td>NETLANDS PLUS 30 M. STRIP</td> <td>AREA = 31732 SQ. M.</td> </tr> </tbody> </table> <p>CUNNINGHAM McCONNELL LIMITED ONTARIO LAND SURVEYORS 100 BAY STREET MILTON ONTARIO L7T 1A7 PHONE (905) 876-8822 FAX (905) 876-8872 EMAIL SURVEY@CML.COM DUAL ADDRESS: 905-876-8822 100 BAY STREET MILTON ONTARIO L7T 1A7</p>	AREA SUMMARY		TOTAL PROPERTY	AREA = 24950 SQ. M.	LOT 4	AREA = 10374 SQ. M.	NETLANDS	AREA = 18336 SQ. M.	NETLANDS PLUS 15 M. STRIP	AREA = 30339 SQ. M.	NETLANDS PLUS 30 M. STRIP	AREA = 31732 SQ. M.	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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No.	Source	Submission	Response
		 <p>Email dated 2021-08-04</p> <p>Hi Heather,</p> <p>Thank you for your response to our submission related to 0 8th Line in Milton. I have copied Charles Priddle at CH to request that CH please adjust their regulated mapping to reflect the agreed upon wetland limits as staked with CH staff on October 12, 2016. A pdf and CAD version of the survey were provided to CH as part of the permit application that was subsequently submitted in 2017. I have attached a pdf and CAD file with the agreed upon wetland limits for reference. As can be seen, the staked wetland limits are significantly less than what is shown on the Region's proposed NHS mapping. Given the significant difference in size, we respectfully request that CH advise the Region as soon as possible, and prior to the Region finalizing their OP mapping, that the wetland (Key Feature) limit can be adjusted to match the attached surveyed limit.</p> <p>Could you please advise as to the timeline available to CH to provide this confirmation?</p> <p>Thanks,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

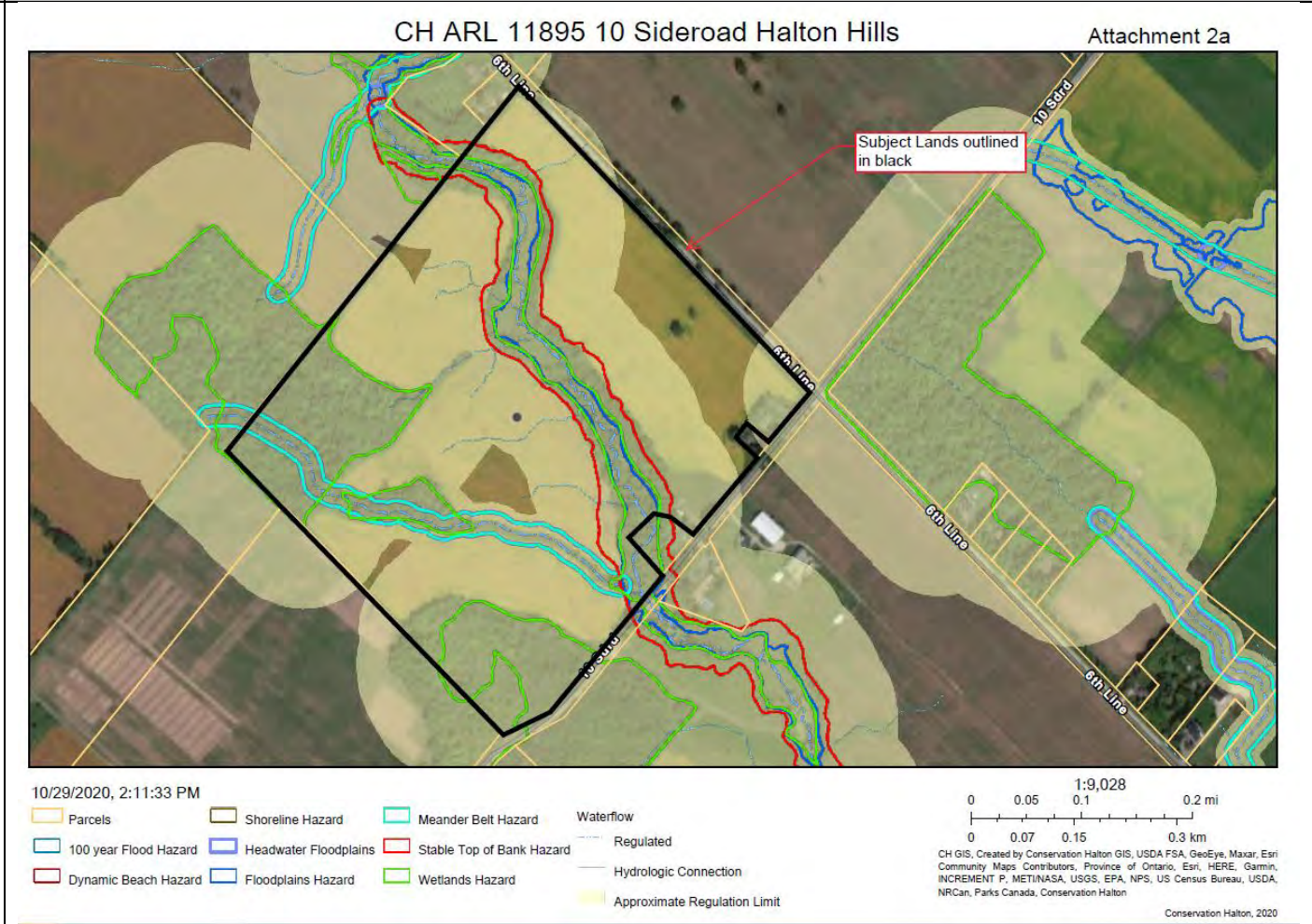
No.	Source	Submission	Response
		<p>Jennifer</p> <p>Email dated 2021-08-07</p> <p>Good morning Charles and Heather, Thank you both, and others at CH and the Region, for this quick response and efforts to incorporate the correct wetland layer in the Region's NHS mapping. We really appreciate it. Take care, Jennifer Jennifer Lawrence, MCIP, RPP</p> <p>President</p> <p>Jennifer Lawrence and Associates Inc.</p>	
22.	11820 and 11895 10 Sideroad	<p>Attached per email dated 2020-10-30 (Jennifer Lawrence)</p> <p>Dear Mr. Benson:</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 11820 and 11895 10 Sideroad Part Lots 9, 10 and 11, Concession VI (Esquensing) Town of Halton Hills</p> <p>I have been retained by 1212949 Ontario Inc. to provide professional planning advice related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 11820 and 11895 10 Sideroad in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p> <p>The Subject Lands are located north and south of 10 Sideroad, on the west side of Sixth Line, as shown on Attachment 1. Both properties are traversed by tributaries of Sixteen Mile Creek. These tributaries, and their associated hazards and/or wetland habitat, are regulated by Conservation Halton (CH) pursuant to Ontario Regulation 162/06, as shown on Attachments 2a and 2b. The current RNHS Key Feature limits on the Subject Lands are generally coincident with the watercourses, wetlands and flooding/erosion hazards associated with CH's regulated areas (Attachments 3a and 3b) however, there are two RNHS Key Features on 11820 10 Sideroad and one on 11895 10 Sideroad that extend beyond CH's regulated areas. These additional Key Feature areas are related to the presence of woodlands.</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The extent of the RNHS on the Subject Lands has increased substantially as compared to the existing ROPA 38 RNHS (Attachments 4a and 4b) to the point where the vast majority of both properties are now within the proposed RNHS. This increase is attributable to the addition of a 500m wide NHS corridor established through the Growth Plan. No changes to the extent of Key Features appears to be proposed on the Subject Lands within the ROPR NHS.</p>	<p>Please note that Regional staff did reach out to arrange a meeting on this submission on two separate occasions. However, no response was received regarding the meeting opportunity. As such, this written response is to follow up on the submission.</p> <p>Regional Planning staff have reviewed the submission, which included the recommendation that the Growth Plan Natural Heritage System (NHS) along the 'Y' linkage connection on the subject lands be removed and/or revised.</p> <p>The Growth Plan 2019 policy 4.2.2.5 provides an opportunity to refine the Growth Plan NHS, for areas not included in the Greenbelt Plan 2017 or NEP 2017, with greater precision through a Municipal Comprehensive Review and general guidance for refinement are outlined in the Technical Report. The Region is currently undertaking our Municipal Comprehensive Review (Regional Official Plan Review).</p> <p>As part of the background technical work for this ROPR, the Growth Plan NHS was reviewed and recommendations for mapping refinements were identified in accordance with the general guidance for refinement outlined on Page 39 of the Growth Plan Regional NHS Mapping Technical Report ('Technical Report'). The western 'Y' linkage connection of the Growth Plan NHS was not identified as part of the mapping refinements as it did not meet the refinement criteria outlined in the Technical Report. For more information on this review, please refer to the Mapping Audit Technical Memo.</p>

No.	Source	Submission	Response
		<p><u>Growth Plan NHS</u></p> <p>The Growth Plan NHS is a 500m wide corridor that has somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection, especially within that portion of the 'Y' connection north of 10 Sideroad and the eastern link does not connect to an NHS east of Trafalgar Road. The Subject Lands are within the central portion of the 'Y' connection as shown on Attachment 5.</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances when HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:</p> <p><i>It is unclear what natural lands the y-shaped linkage is intended to connect to along the 'eastern link'. It is assumed it is intended to connect to woodlands and valleylands associated with Silver Creek. The land in between is a designated greenfield area and is currently undergoing a Secondary Planning exercise. While some lands will be designated NHS and open space through that process, other lands will be designated for various residential, institutional and employment related uses. There will be no opportunity for a regional scale linkage across these lands given that no linkage has been identified in the Secondary Plan or associated Subwatershed Study to bridge the large gap between natural features that the province's GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Region's Transportation Master Plan, will represent a barrier. Please consider eliminating this linkage in consideration of the fact that a connected regional scale linkage will not be possible in this area.</i></p> <p><i>Given Growth Plan policies relating to Settlement Boundary Expansions as they relate to the GPNHS, outlined in section 2.2.8.f), options for expansion of settlement boundaries westward from the designated greenfield area in Southwest Georgetown will be made difficult due to the presence of the proposed 'eastern link'. While we agree that there may be justification for a local linkage in this area to connect to the more robust regional linkage between the Greenbelt NHS and the NEPA (the 'northern/southern link'), a 500m wide regional linkage (the 'eastern link') is unwarranted given the issues noted in the preceding comment and thus will constrain settlement boundary expansions in this area unnecessarily.</i></p> <p>Further, if the Province's intention was to connect to the woodlands and valleylands associated with Silver Creek, as was assumed by HAPP, the Vision Georgetown Secondary Plan NHS configuration east of Trafalgar Road does not facilitate this connection but rather, results in the Growth Plan NHS connecting to a tributary of Sixteen Mile Creek rather than Silver Creek.</p> <p>It is respectfully recommended that a robust connection between the Greenbelt Plan Area and the Niagara Escarpment Plan Area already exists between Regional Road 25 and Third Line at 10 Sideroad, just a couple of kilometres to the west of the 'Y' connection created by the Growth Plan NHS (Attachment 5). The creation by the Province of this second extensive 'Y' connection, in proximity to an</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>existing and more logical connection between the Greenbelt and Niagara Escarpment Plans is questionable.</p> <p>Within the <i>Mapping Audit Technical Memo, Review of the Regional Official Plan Natural Heritage Systems Policies and Mapping</i>, prepared for the Region by Gladki Planning Associates et. al. dated May 2020, Section 3.2.4 provides options for refinements to the Growth Plan NHS in Halton. Specifically, on page 11 of the memo this section includes 'Areas for Further Discussion' and states the following:</p> <p><i>Patches that do not fulfill Growth Plan objectives: three of the additional polygons do not provide the intended function, for example a portion of the "Y" west of Georgetown which relies on connection being established through the SW Georgetown Area (see NS_ID 1182 in Appendix 1).</i></p> <p>A review of Appendix 1 reveals that there is no NS_ID 1182 however, NS_IDs 1122, 1127 and 1129 refer to "Part of the 'Y' west of Trafalgar Rd in Halton Hills. Partially connects Sixteen Mile Creek to the Niagara Escarpment and partial connection to SW Georgetown". Based on this description, it is assumed that the reference within Section 3.2.4 was intended for one or all of the above noted NS_IDs rather than NS_ID 1182. Based on that assumption, each of these three areas within Appendix 1 are noted as requiring internal discussion with respect to whether this portion of the Growth Plan NHS should be retained or removed. The Natural Heritage Discussion Paper does not elaborate on the internal discussion that took place between the release of the May 2020 technical memo and the June 2020 Discussion Paper or whether it is the Region's intention to undertake those internal discussions subsequent to receiving comments on the Discussion Paper.</p> <p>The issues raised by HAPP in 2017, and as reiterated in the Mapping Audit Technical Memo (May 2020), remain valid and should continue to be pursued by the Region through the ROPR process. Specifically, if the eastern link of the 'Y' connection does not provide for a connection to the Silver Creek watershed to the east, the entire intent of the 'Y' connection is called into question. The northern link of the 'Y' connection, north of 10 Sideroad, contains extremely limited natural heritage features, further calling into question the applicability of a linkage connection through this area. As such, it is respectfully recommended that the Region take this opportunity to request that the Province refine the Growth Plan NHS limits as provided for in Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3:</p> <p><i>4.2.2.4 Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.</i></p> <p><i>4.2.2.5 Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review.</i></p> <p><i>5.2.2.3 The Province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.</i></p> <p><u>Recommendation</u></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

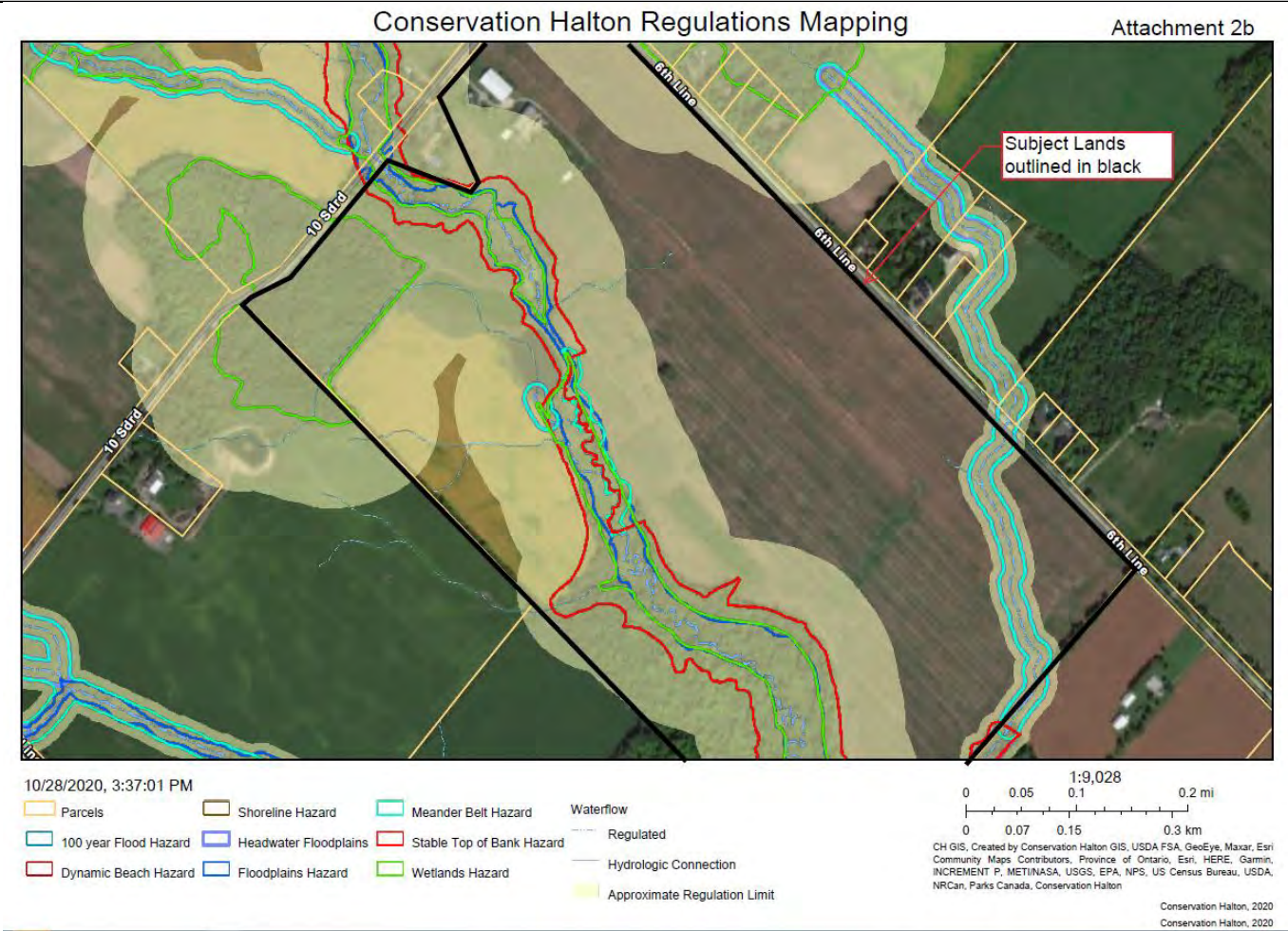
No.	Source	Submission	Response
		<p>Based on a review of mapping from the ROPR RNHS, Growth Plan NHS and CH Online Mapping as well as the <i>Natural Heritage Discussion Paper</i> (June 2020) and <i>Mapping Audit Technical Memo</i> (May 2020), it is respectfully recommended that the Region request that the Province revise/remove the Growth Plan NHS along the 'Y' connection through the Subject Lands given that this NHS linkage does not connect to any linkage of substance on the east side of Trafalgar Road within the approved Secondary Plan for Southwest Georgetown and the northern link of the 'Y' connection contains extremely limited natural heritage features. Such a recommendation is in-keeping with the Regional and Town Council endorsed recommendation provided by the Halton Area Planning Partnership to the Province in 2017, is supported by the acknowledgement in the <i>Mapping Audit Technical Memo</i> (Gladki Planning Associates et. al., May 2020) that the Growth Plan NHS in this area does not fulfill Growth Plan objectives and is permitted through Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3.</p> <p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly, Jennifer Lawrence, MCIP, RPP President</p> <div data-bbox="655 842 1951 1818"> <p style="text-align: center;">Attachment 1</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  </div> <div style="width: 45%;"> <p style="text-align: center;">11820 and 11895 10 Sideroad Halton Hills</p> <div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">Legend</p> <ul style="list-style-type: none"> Town Boundary Urban, Hamlet, Rural Area <ul style="list-style-type: none"> Urban Hamlet Rural Cluster Street Parcel, Assessment </div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p>Notes</p> </div> </div> </div> <div style="margin-top: 10px;"> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px; font-size: 8px;"> <p>This map was produced by the Town of Halton Hills and is not to be reproduced or distributed without permission. Data is approximate and should be used for information purposes only. Data is © copyright 2019 and is sublicensed through the Region of Halton, Teranet Enterprises Inc. and other agencies.</p> <p>Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere Scale: 1:29,650 © The Corporation of The Town of Halton Hills Date: 10/29/2020</p> </div> </div> </div> </div>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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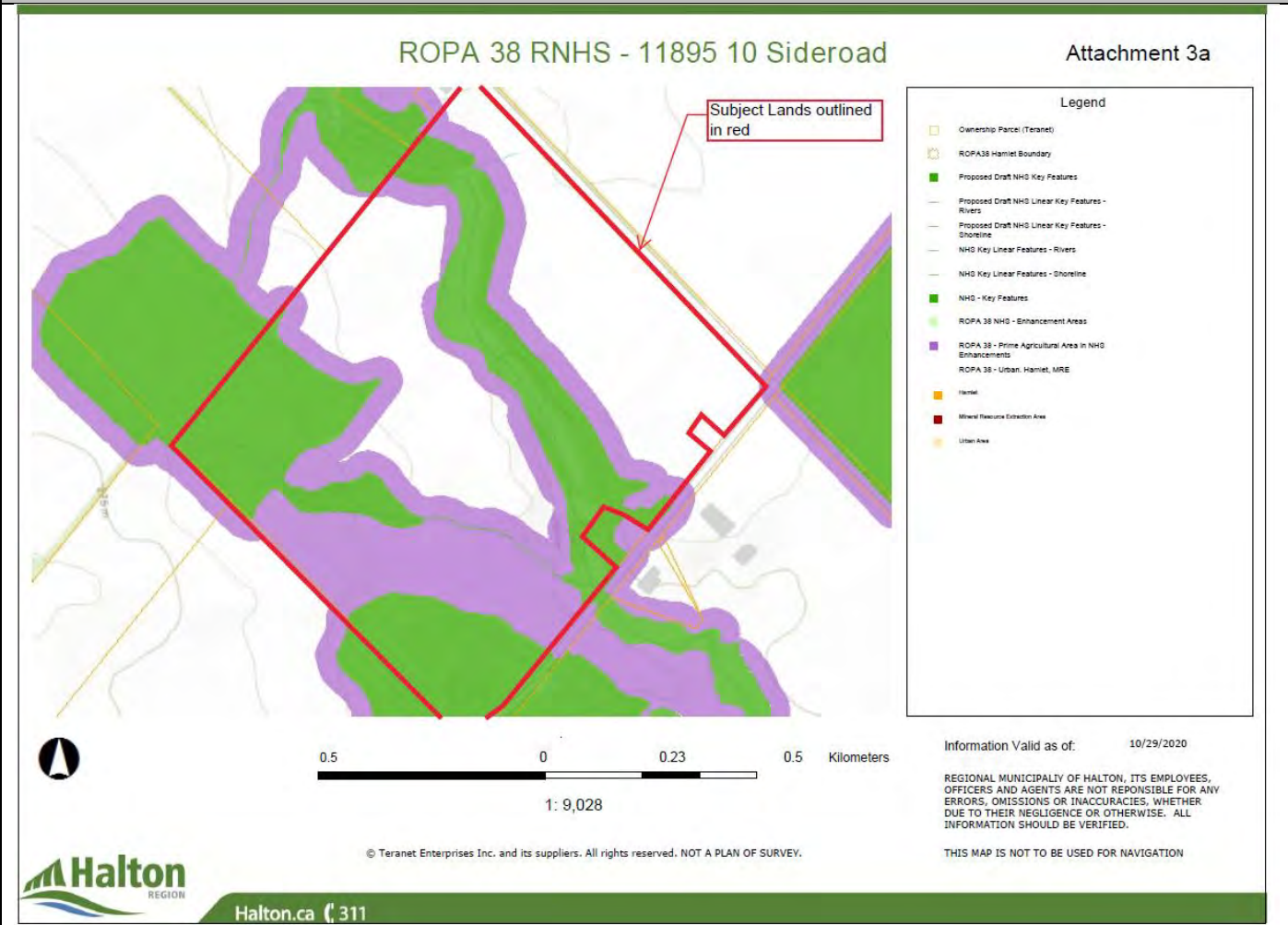
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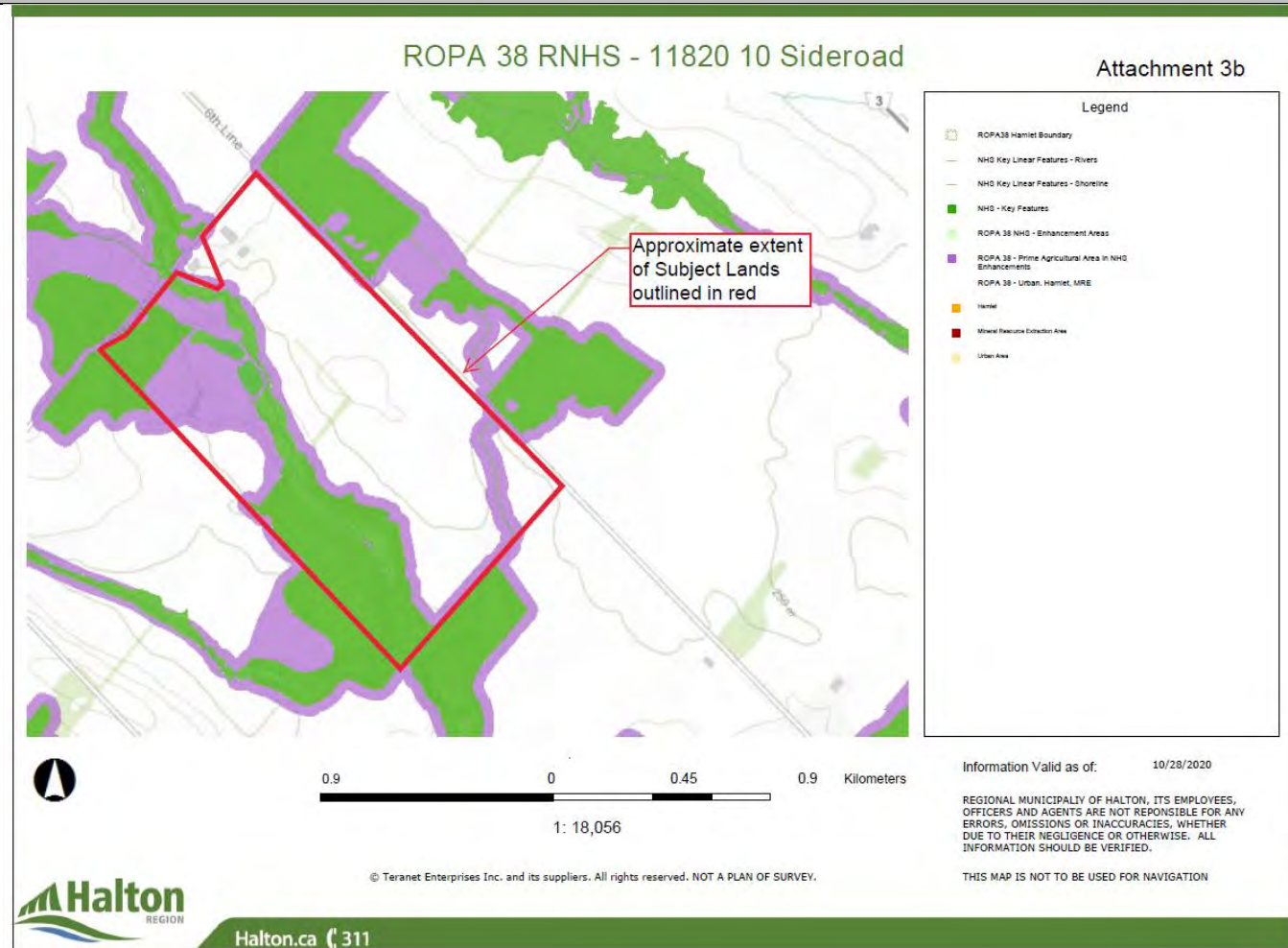
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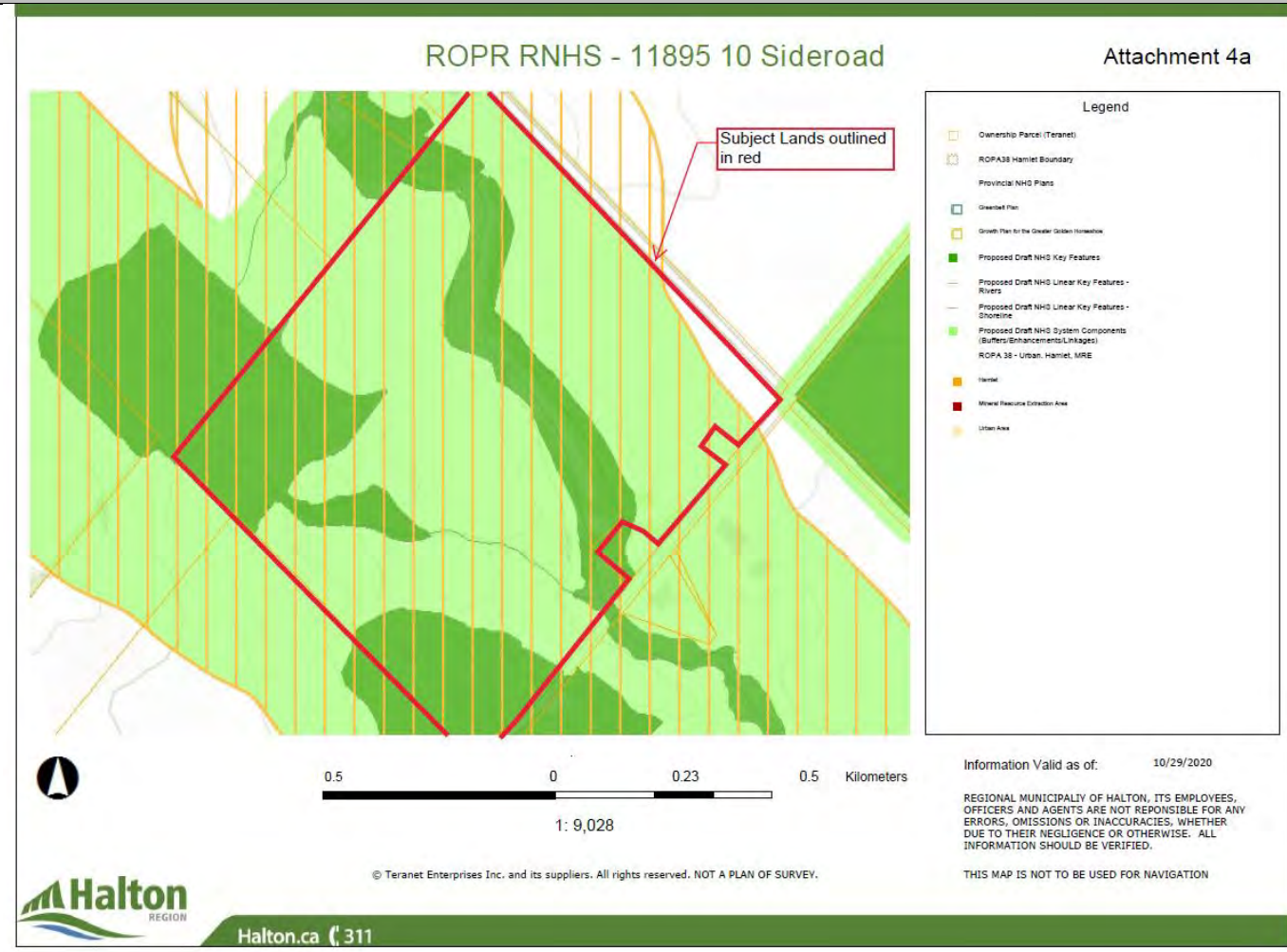
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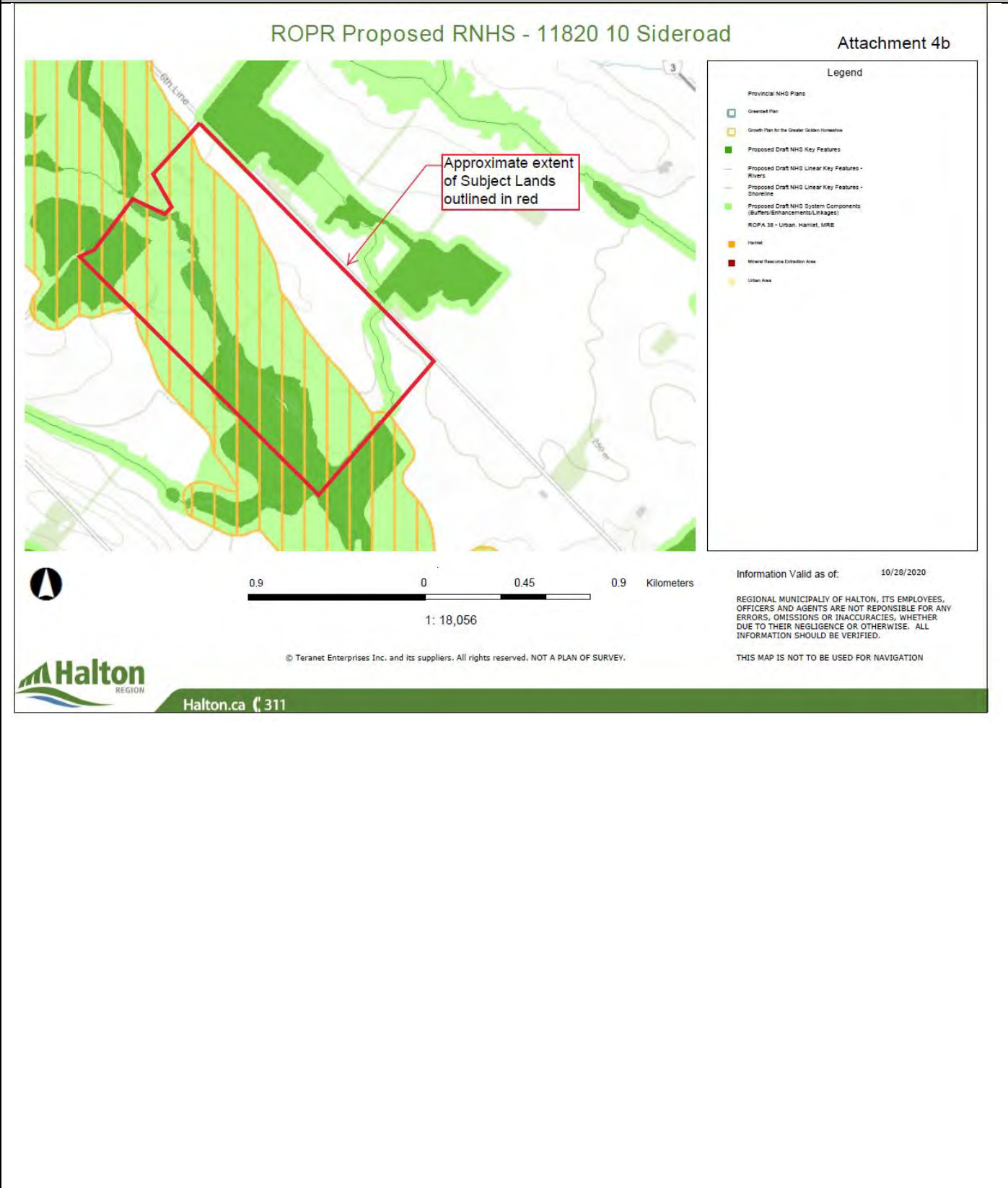
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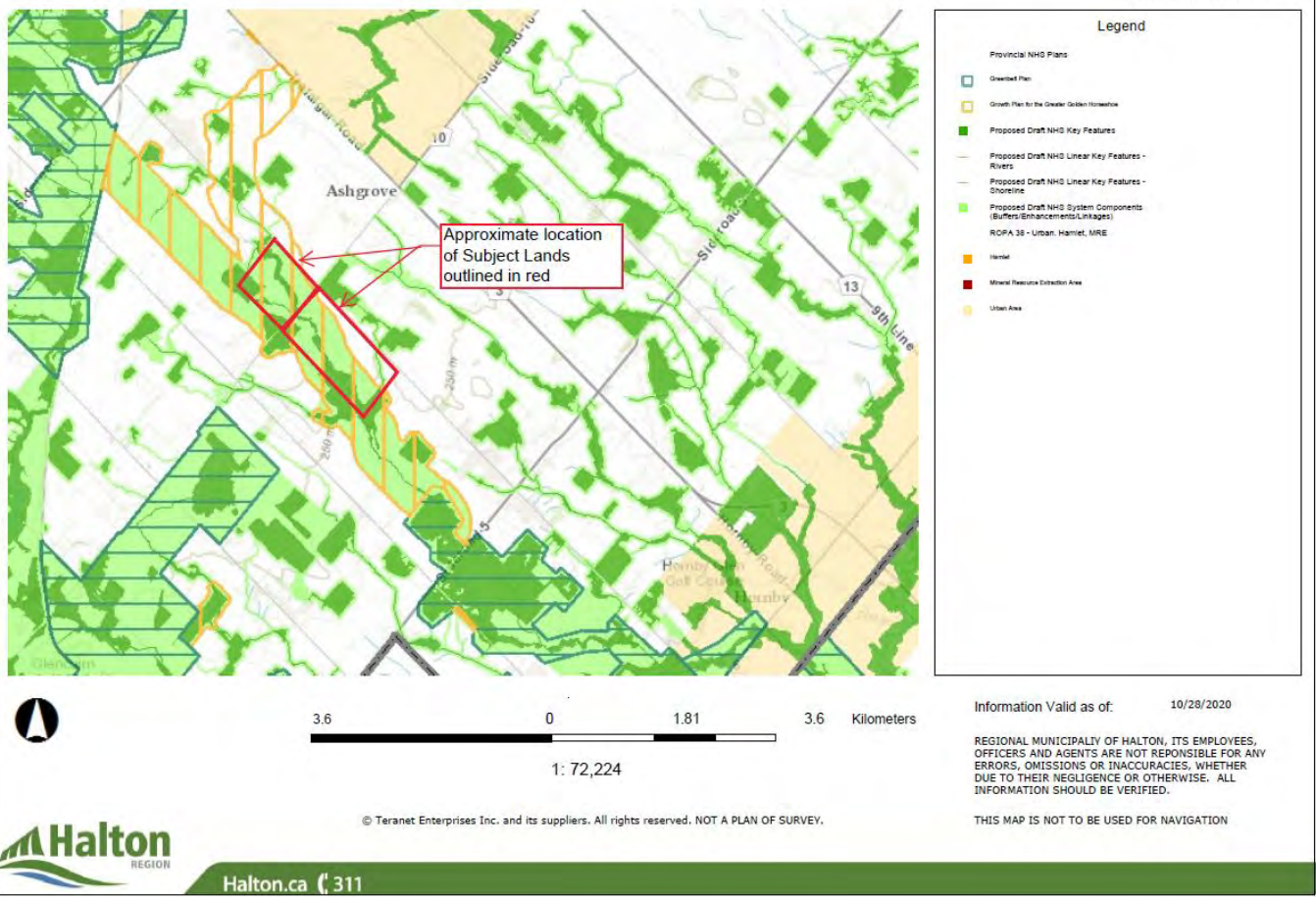


Comments are acknowledged. Please see above for a detailed response.

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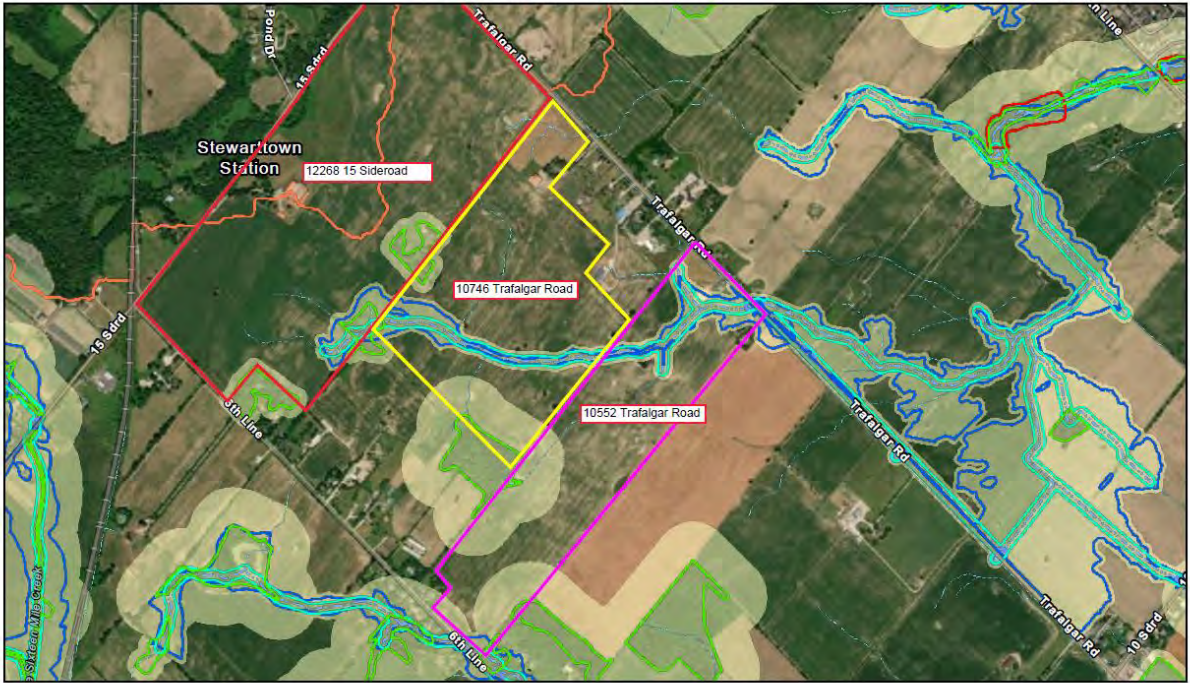
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No.	Source	Submission	Response
		<p style="text-align: center;">ROPR Proposed RNHS Overview</p>  <p style="text-align: right;">Attachment 5</p> <p style="text-align: center;">Information Valid as of: 10/28/2020</p> <p style="text-align: center;"><small>REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED.</small></p> <p style="text-align: center;"><small>THIS MAP IS NOT TO BE USED FOR NAVIGATION</small></p> <p style="text-align: center;"><small>© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</small></p> <p style="text-align: center;">Halton REGION Halton.ca 311</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
23.	10552 and 10764 Trafalgar Road and 12268 15 Sideroad	<p>Attached per email dated 2020-10-30 (Jennifer Lawrence)</p> <p>Dear Mr. Benson:</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 10552 and 10746 Trafalgar Road and 12268 15 Sideroad Town of Halton Hills</p> <p>I have been retained by 14256 10 Side Road Developments (Mattamy Home and Hodero Holding) and Valentina Farms to provide professional planning advice related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 10552 Trafalgar Road, 10746 Trafalgar Road and 12268 15 Sideroad in the Town of Halton Hills (Subject Lands). 14256 10 Side Road Developments is the Owner of Part Lot 10, Concession IX (Esquesing), Part 1, 20R- 20562 in the Town of Halton Hills.</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p>	<p>Halton Region did submit a request to remove the 'eastern link' of the NHS 'Y' connection based on the municipal refinement criteria provided in the Province's Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe: Summary of criteria and Methods. The Province approved the request to refine the Growth Plan NHS in September 2020. Halton's draft proposed Natural Heritage System mapping was updated to reflect this refinement. However, the Ministry of Northern Development, Natural Resources, and Forestry still need to update the GIS data mapping for the Province. Detailed e-mail correspondence for this submission can be made available upon request.</p>

No.	Source	Submission	Response
		<p>The Subject Lands are located south of 15 Sideroad, on the west side of Trafalgar Road, as shown on Attachment 1. A triangular section of 12268 15 Sideroad is captured within the Greenbelt NHS immediately south of 15 Sideroad. In addition, small portions of these three properties are designated RNHS within the current Region of Halton Official Plan. These small areas are associated with four wooded/wetland areas and/or the 30m buffer associated with these woodland/wetland areas (Attachment 2).</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The extent of RNHS on the Subject Lands has increased substantially as compared to the existing ROPA 38 RNHS (Attachment 3). This increase is attributable to two changes:</p> <ol style="list-style-type: none"> 1. A 500m wide NHS corridor established through the Growth Plan; and, 2. A tributary of Sixteen Mile Creek and a headwater drainage feature connecting two of the woodlands on 10746 Trafalgar Road. <p><u>Growth Plan NHS</u></p> <p>The Growth Plan NHS is a 500m wide corridor that has somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection, especially within that portion of the 'Y' connection north of 10 Sideroad and the eastern link does not connect to an NHS east of Trafalgar Road.</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances when HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. The Subject Lands contain what HAPP refers to as the 'eastern link' of this 'Y' shaped connection. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:</p> <p><i>It is unclear what natural lands the y-shaped linkage is intended to connect to along the 'eastern link'. It is assumed it is intended to connect to woodlands and valleylands associated with Silver Creek. The land in between is a designated greenfield area and is currently undergoing a Secondary Planning exercise. While some lands will be designated NHS and open space through that process, other lands will be designated for various residential, institutional and employment related uses. There will be no opportunity for a regional scale linkage across these lands given that no linkage has been identified in the Secondary Plan or associated Subwatershed Study to bridge the large gap between natural features that the province's GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Region's Transportation Master Plan, will represent a barrier. Please consider eliminating this linkage in consideration of the fact that a connected regional scale linkage will not be possible in this area.</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

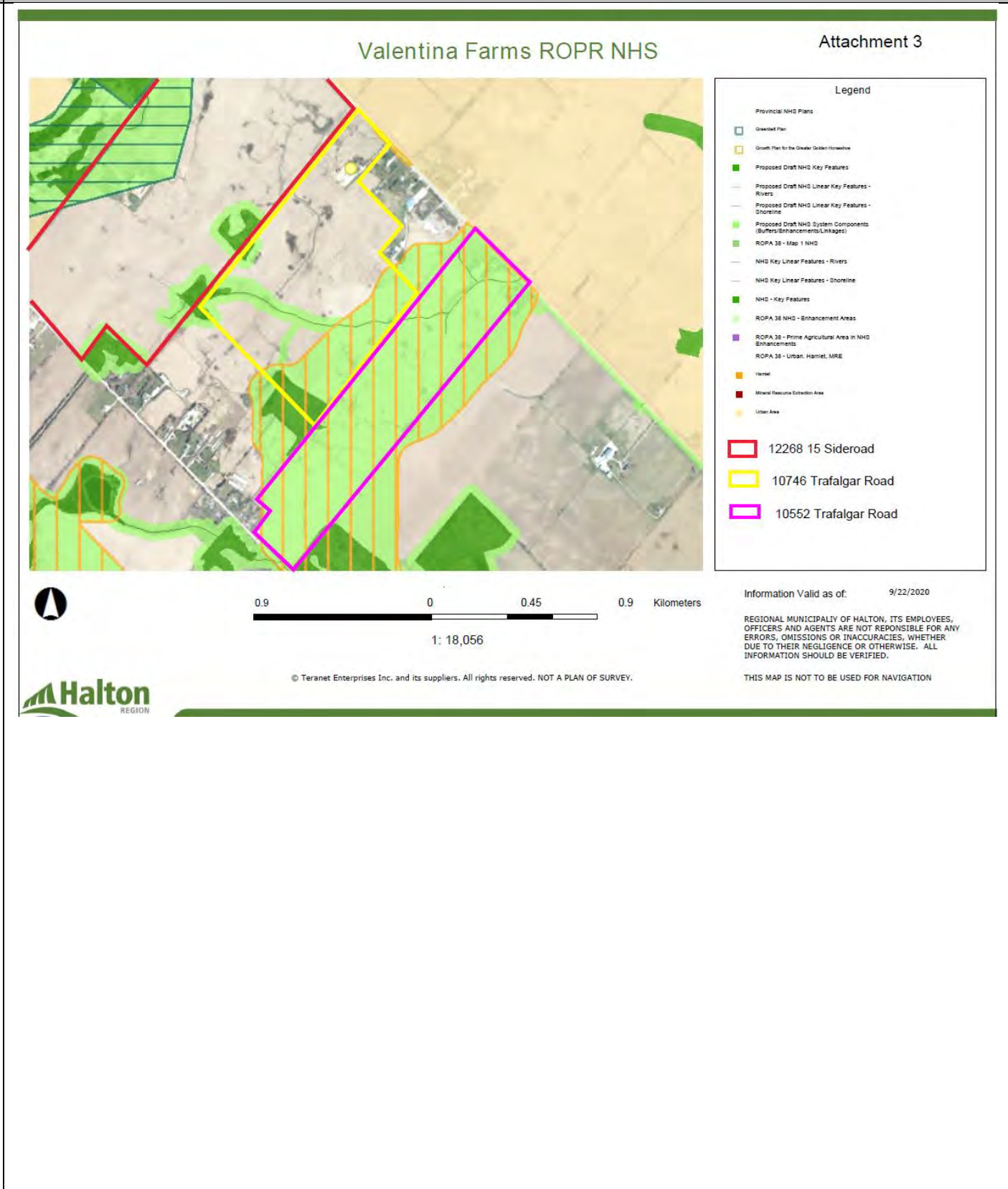
No.	Source	Submission	Response
		<p><i>Given Growth Plan policies relating to Settlement Boundary Expansions as they relate to the GPNHS, outlined in section 2.2.8.f), options for expansion of settlement boundaries westward from the designated greenfield area in Southwest Georgetown will be made difficult due to the presence of the proposed 'eastern link'. While we agree that there may be justification for a local linkage in this area to connect to the more robust regional linkage between the Greenbelt NHS and the NEPA (the 'northern/southern link'), a 500m wide regional linkage (the 'eastern link') is unwarranted given the issues noted in the preceding comment and thus will constrain settlement boundary expansions in this area unnecessarily.</i></p> <p>Further, if the Province's intention was to connect to the woodlands and valleylands associated with Silver Creek, as was assumed by HAPP, the proposed Secondary Plan NHS configuration east of Trafalgar Road does not facilitate this connection but rather, results in the Growth Plan NHS connecting to Sixteen Mile Creek rather than Silver Creek. See details below in the section titled 'Vision Georgetown Secondary Plan'.</p> <p>It is respectfully recommended that a robust connection between the Greenbelt Plan Area and the Niagara Escarpment Plan Area already exists between Regional Road 25 and Third Line at 10 Sideroad, just a couple of kilometres to the west of the 'Y' connection created by the Growth Plan NHS (Attachment 4). The creation by the Province of this second extensive 'Y' connection, in proximity to an existing and more logical connection between the Greenbelt and Niagara Escarpment Plan is questionable.</p> <p><i>Within the Mapping Audit Technical Memo, Review of the Regional Official Plan Natural Heritage Systems Policies and Mapping, prepared for the Region by Gladki Planning Associates et. al., dated May 2020, Section 3.2.4 provides options for refinements to the Growth Plan NHS in Halton. Specifically, on page 11 of the memo this section includes 'Areas for Further Discussion' and states the following:</i></p> <p><i>Patches that do not fulfill Growth Plan objectives: three of the additional polygons do not provide the intended function, for example a portion of the "Y" west of Georgetown which relies on connection being established through the SW Georgetown Area (see NS_ID 1182 in Appendix 1).</i></p> <p>A review of Appendix 1 reveals that there is no NS_ID 1182 however, NS_IDs 1122, 1127 and 1129 refer to "Part of the 'Y' west of Trafalgar Rd in Halton Hills. Partially connects Sixteen Mile Creek to the Niagara Escarpment and partial connection to SW Georgetown". Based on this description, it is assumed that the reference within Section 3.2.4 was intended for one or all of the above noted NS_IDs rather than NS_ID 1182. Based on that assumption, each of these three areas within Appendix 1 are noted as requiring internal discussion with respect to whether this portion of the Growth Plan NHS should be retained or removed. The Natural Heritage Discussion Paper does not elaborate on the internal discussion that took place between the release of the May 2020 technical memo and the June 2020 Discussion Paper or whether it is the Region's intention to undertake those internal discussions subsequent to receiving comments on the Discussion Paper.</p> <p>The issues raised by HAPP in 2017, and as reiterated in the Mapping Audit Technical Memo (May 2020), remain valid and should continue to be pursued by the Region through the ROPR process. It is respectfully recommended that the Region take this opportunity to request that the Province refine the Growth Plan NHS limits as provided for in Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3:</p> <p><i>4.2.2.4 Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.</i></p> <p><i>4.2.2.5 Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review.</i></p> <p><i>5.2.2.3 The Province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.</i></p> <p><u><i>Vision Georgetown Secondary Plan</i></u></p> <p>On July 9, 2018, Town Council adopted OPA 32 regarding the Vision Georgetown Secondary Plan. On September 25, 2020 the Region of Halton issued their Decision to approve, with modifications, OPA 32. Schedule H6-2 is the Land Use Plan (Attachment 5) which identifies a Natural Heritage System. The location of the Subject Lands, in relation to the Secondary Plan, have been identified on Attachment 5. The 500m wide Growth Plan NHS corridor that covers the majority of 10552 Trafalgar Road connects to a Future Natural Channel Corridor east of Trafalgar Road that provides for the realignment of the Sixteen Mile Creek tributary whose upstream drainage historically originated from the Subject Lands. The Future Natural Channel Corridor has been identified as a minimum 60m wide corridor in the Subwatershed Study (Attachment 6).</p> <p>Based on the above, if it was the Province's original vision that the 500m wide eastern link of the 'Y' connection would connect the Sixteen Mile Creek watershed to the Silver Creek watershed, through the lands east of Trafalgar Road, this has not been provided for in the approved Secondary Plan. As such, there is no need for the 500m wide linkage through 10552 Trafalgar Road as it does not have a similar sized linkage on the east side of Trafalgar Road but rather, a 60m Future Natural Channel Corridor that connects to the Sixteen Mile Creek watershed.</p> <p><u><i>Sixteen Mile Creek Tributary</i></u></p> <p>The tributary of Sixteen Mile Creek begins at the southern limit of 12268 15 Sideroad and flows southeasterly across 10746 and 10552 Trafalgar Road (Attachment 1) eventually flowing into a ditch along the west side of Trafalgar Road for approximately 1 km before connecting to a tributary of Sixteen Mile Creek east of Trafalgar Road (Attachment 7). Conservation Halton (CH) mapping indicates that this tributary, and its associated flooding and erosion hazards are regulated pursuant to Ontario Regulation 162/06 (Attachment 1). As a result, the tributary and its associated hazards have been included in the proposed RNHS. The tributary is identified as a Key Feature while the associated flood plain is shown as a Buffer/Enhancement Linkage. There is no objection to the inclusion of the Key Feature and linkage within the ROPR RNHS.</p> <p><u><i>Headwater Drainage Feature/Linkage</i></u></p> <p>A headwater drainage feature, connecting the woodland at the southwest corner of 10746 Trafalgar Road to the above noted tributary has been included in the proposed RNHS as a Buffer/Enhancement/Linkage however, it is assumed that, given the connection between the woodland and the tributary, the feature is</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

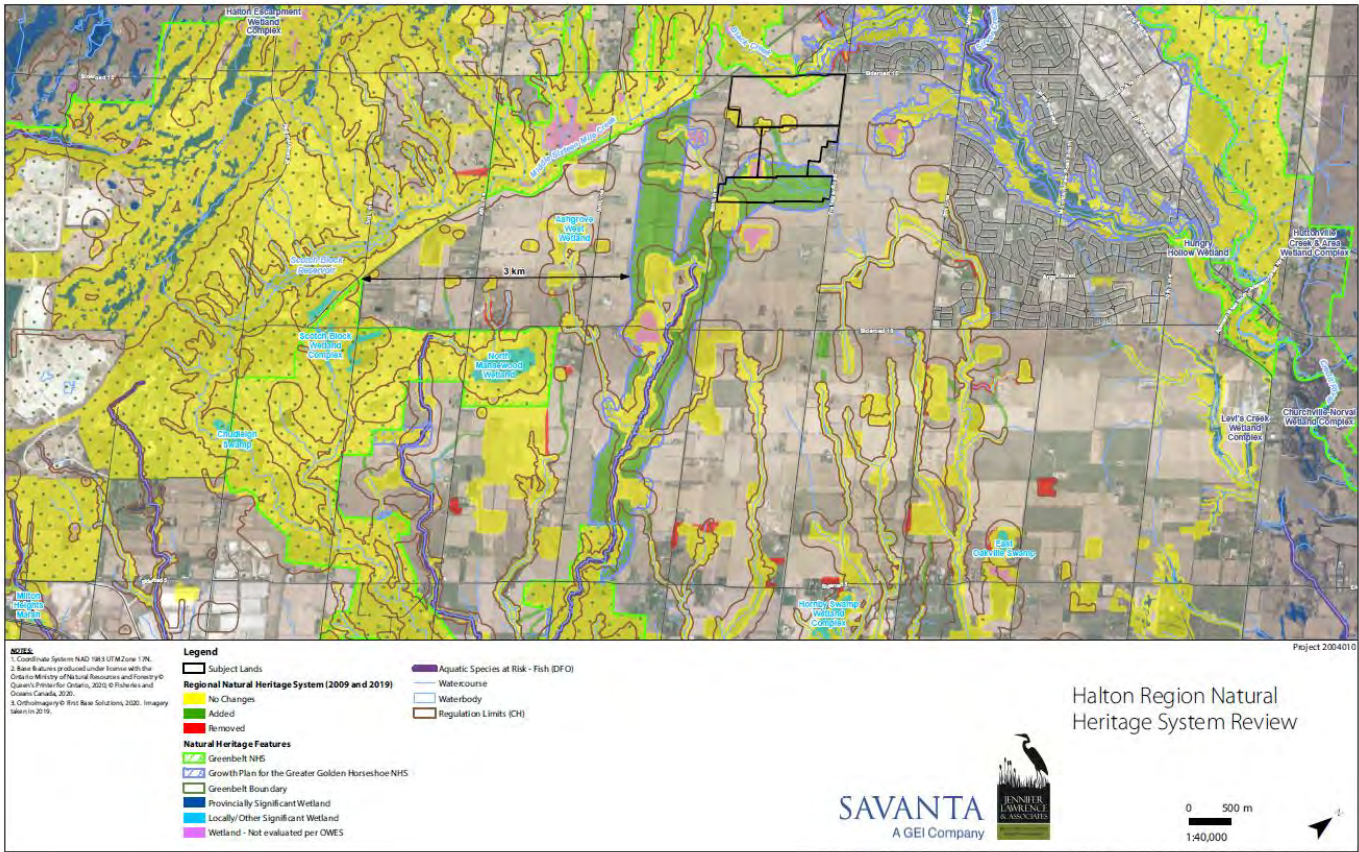
No.	Source	Submission	Response
		<p>intended to act as a Linkage. There is no objection to the inclusion of the linkage along this headwater drainage feature within the ROPR RNHS.</p> <p>Recommendation</p> <p>Based on a review of mapping from the ROPR RNHS, Growth Plan NHS, CH Online Mapping and OPA 32 as well as the <i>Natural Heritage Discussion Paper</i> (June 2020) and <i>Mapping Audit Technical Memo</i> (May 2020), it is respectfully recommended that the Region request that the Province revise/remove the Growth Plan NHS along the 'eastern link' of the NHS 'Y' connection through the Subject Lands given that this NHS linkage does not connect to any linkage of substance on the east side of Trafalgar Road within the approved Secondary Plan for Southwest Georgetown. Such a recommendation is in-keeping with the Regional and Town Council endorsed recommendation provided by the Halton Area Planning Partnership to the Province in 2017, is supported by the acknowledgement in the <i>Mapping Audit Technical Memo</i> (Gladki Planning Associates et. al., May 2020) that the Growth Plan NHS in this area does not fulfill Growth Plan objectives and is permitted through Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3.</p> <p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly, Jennifer Lawrence, MCIP, RPP President</p> <p style="text-align: center;">Valentina Farms CH ARL Attachment 1</p>  <p>9/22/2020, 4:37:01 PM</p> <p>1:18,056</p> <p>0 0.1 0.2 0.4 mi 0 0.17 0.35 0.7 km</p> <p>Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, CH GIS, Created by Conservation Halton GIS. Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Conservation Halton, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">Valentina Farms ROPA 38 NHS Attachment 2</p> <p>Legend</p> <ul style="list-style-type: none"> ROPA 38 - Map 1 NHS NHD Key Linear Features - Rivers NHD Key Linear Features - Shoreline NHD - Key Features ROPA 38 NHS - Enhancement Areas ROPA 38 - Prime Agricultural Area in NHS Enhancements ROPA 38 - Urban, Hamlet, MRE Hamlet Mixed Feature Extension Area Urban Area <p> 12268 15 Sideroad 10746 Trafalgar Road 10552 Trafalgar Road </p> <p>Information Valid as of: 9/22/2020</p> <p>REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED.</p> <p>THIS MAP IS NOT TO BE USED FOR NAVIGATION</p> <p>© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p> <p>Halton REGION Halton.ca 311</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

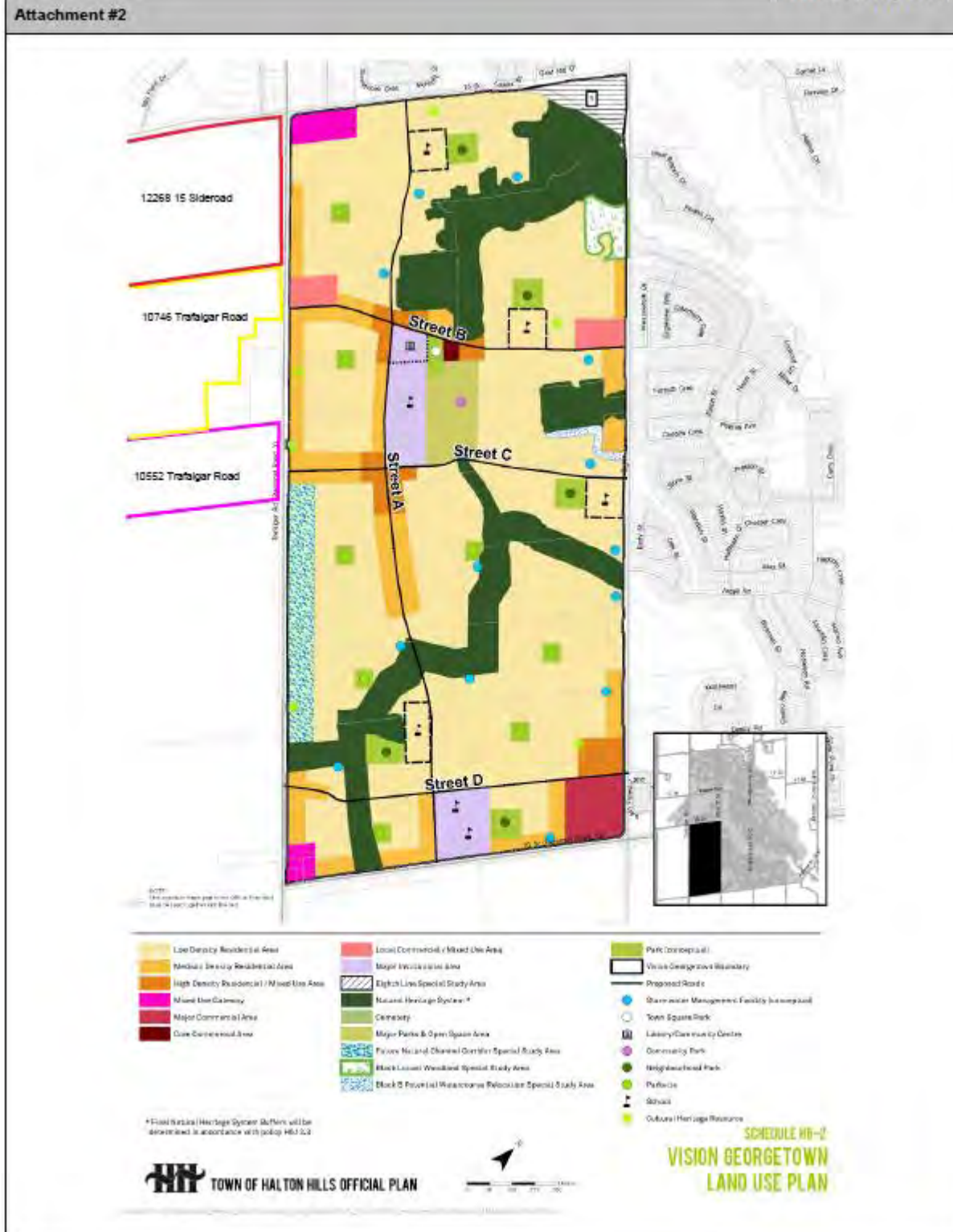
No.	Source	Submission	Response
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Comments are acknowledged. Please see above for a detailed response.

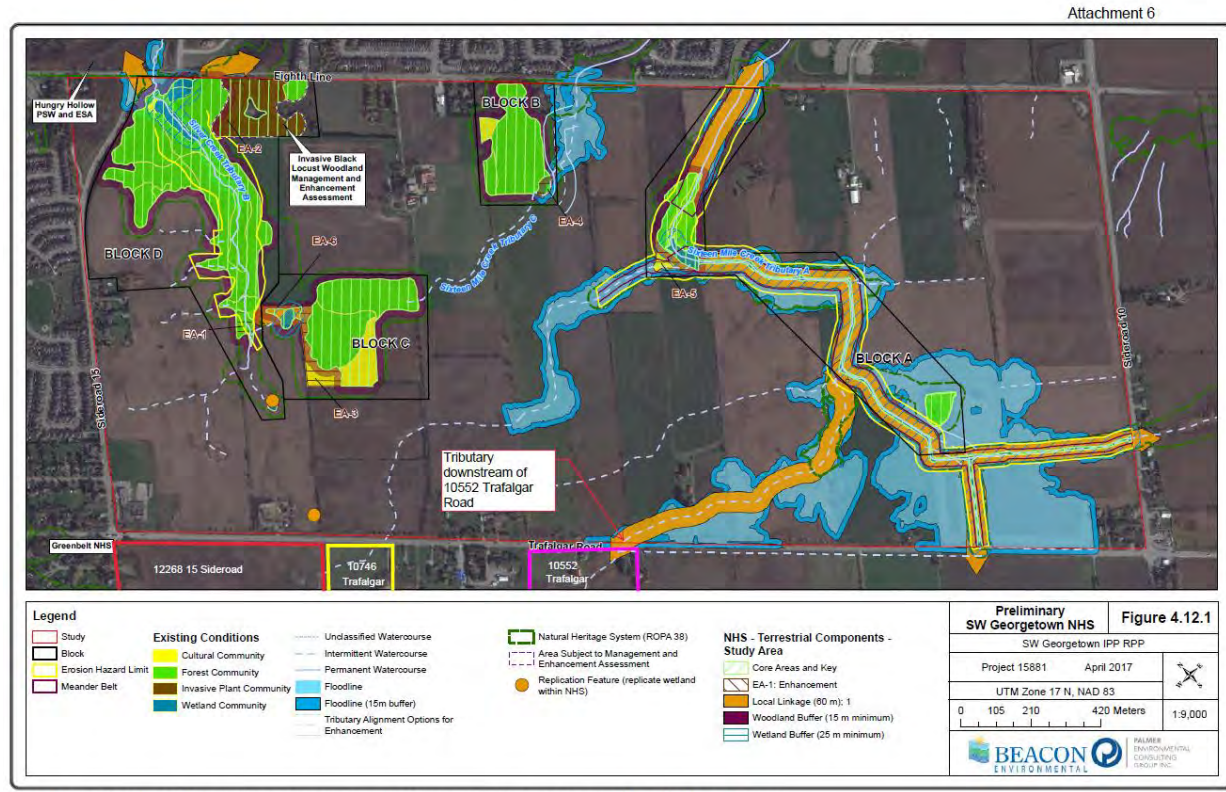
No.	Source	Submission	Response
		<p style="text-align: right;">Attachment 4</p>  <p>Legend</p> <ul style="list-style-type: none"> Subject Lands Regional Natural Heritage System (2009 and 2019) <ul style="list-style-type: none"> No Changes Added Removed Natural Heritage Features <ul style="list-style-type: none"> Greenbelt NIS Growth Plan for the Greater Golden Horseshoe NIS Greenbelt Boundary Provincially Significant Wetland Locally/Other Significant Wetland Wetland - Not evaluated per OWES Aquatic Species at Risk - Fish (DFO) Watercourse Waterbody Regulation Limits (CH) <p>NOTES</p> <ol style="list-style-type: none"> Coordinate System: NAD 1983 UTM Zone 18N Base: Satellite imagery under license with the Ontario Ministry of Natural Resources and Forestry & Queen's Printer for Ontario, 2020 © Ontario and Geomatics Canada, 2020. Orthorectified: Geo Base Solutions, 2020. Imagery taken in 2019. <p>Project 2004010</p> <p style="text-align: center;">Halton Region Natural Heritage System Review</p> <p style="text-align: center;">SAVANTA A GEI Company</p> <p style="text-align: center;">BNNB BIRNBERG NORRIS & BENNETT</p> <p style="text-align: right;">0 500 m 1:40,000</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

Attachment 5

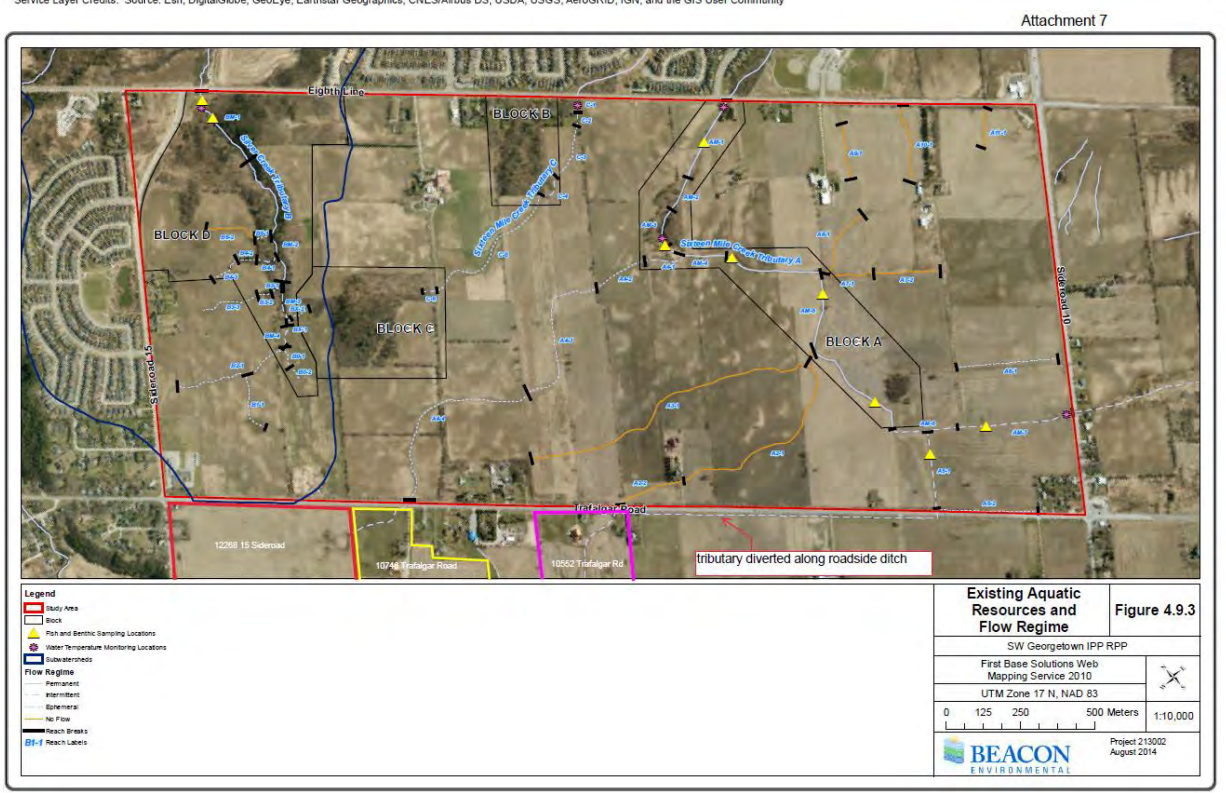


Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
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Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
24.	10560, 10670 and 10858 Sixth Line	<p>Attached per email dated 2020-10-30 (Jennifer Lawrence)</p> <p>Dear Mr. Benson:</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 10560, 10670 and 10858 Sixth Line Part Lot 14, Concession VI (Esqueusing) Town of Halton Hills</p> <p>I have been retained by 2312416 Ontario Limited, 2312414 Ontario Limited and 2312413 Ontario Limited to provide professional planning advice related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 10560, 10670 and 10858 Sixth Line in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p> <p>The Subject Lands are located south of 15 Sideroad, on the west side of Sixth Line (Attachment 1) and are traversed by a tributary of Sixteen Mile Creek. The creek, and its associated wetlands, flood plain and erosion hazards are regulated by Conservation Halton (Attachments 2a, b and c). In addition to the tributary of Sixteen Mile Creek, there appears to be a hydrologic connection with an associated wetland that has been mapped along the property boundary between 10670 and 10560 Sixth Line. The RNHS Key Features identified on Attachments 3a, b and c are generally coincident with Conservation Halton's watercourse, wetland and flood plain hazard on the Subject Lands.</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The extent of RNHS on the Subject Lands has increased substantially as compared to the existing ROPA 38 RNHS (Attachment 4). This increase is attributable to two 500m wide NHS corridors established through the Growth Plan.</p> <p><u>Growth Plan NHS</u></p> <p>The Growth Plan NHS through the Subject Lands includes two 500m wide corridors that have somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection, especially north of 10 Sideroad and through the Subject Lands.</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances when HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. The Subject Lands contain what HAPP refers to as both the 'northern link' and the 'eastern link' of this 'Y' shaped connection. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:</p>	<p>Thank you for your submission on behalf of your clients, 2312416 Ontario Ltd., 2312414 Ontario Ltd., and 2312413 Ontario Ltd., dated October 30, 2020, regarding the properties at 10560, 10670, and 10858 Sixth Line, Halton Hills ('Subject Lands' or 'the properties') and the Natural Heritage Discussion Paper, Mapping Audit Technical Memo, and draft proposed Regional Natural Heritage System (RNHS) Mapping. This submission will form a part of our documentation as we proceed with the Regional Official Plan Review (ROPR).</p> <p>Regional Planning staff have reviewed your submission, which included the recommendation that the Growth Plan Natural Heritage System (NHS) along the 'Y' linkage connection on the subject lands be removed and/or revised.</p> <p>The Growth Plan 2019 policy 4.2.2.5 provides an opportunity to refine the Growth Plan NHS, for areas not included in the Greenbelt Plan 2017 or NEP 2017, with greater precision through a Municipal Comprehensive Review and general guidance for refinement are outlined in the Technical Report. The Region is currently undertaking our Municipal Comprehensive Review (Regional Official Plan Review).</p> <p>As part of the background technical work for this ROPR, the Growth Plan NHS was reviewed and recommendations for mapping refinements were identified in accordance with the general guidance for refinement outlined on Page 39 of the Growth Plan Regional NHS Mapping Technical Report ('Technical Report'). The western 'Y' linkage connection of the Growth Plan NHS was not identified as part of the mapping refinements as it did not meet the refinement criteria outlined in the Technical Report. For more information on this review, please refer to the Mapping Audit Technical Memo.</p>

No.	Source	Submission	Response
		<p><i>A y-shaped linkage is proposed within Halton Hills, extending between lands located in the existing Greenbelt NHS associated with 16 Mile Creek (the “southern link”), lands in the Niagara Escarpment Plan Area (NEPA) to the north (the “northern link”) and designated greenfield areas in Southwest Georgetown to the east (the “eastern link”). This linkage is approximately 500m wide and delineation of this linkage does not appear to consider the RNHS.</i></p> <p><i>It is unclear what natural lands the y-shaped linkage is intended to connect to along the ‘eastern link’. It is assumed it is intended to connect to woodlands and valleylands associated with Silver Creek. The land in between is a designated greenfield area and is currently undergoing a Secondary Planning exercise. While some lands will be designated NHS and open space through that process, other lands will be designated for various residential, institutional and employment related uses. There will be no opportunity for a regional scale linkage across these lands given that no linkage has been identified in the Secondary Plan or associated Subwatershed Study to bridge the large gap between natural features that the province’s GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Region’s Transportation Master Plan, will represent a barrier. Please consider eliminating this linkage in consideration of the fact that a connected regional scale linkage will not be possible in this area.</i></p> <p><i>Given Growth Plan policies relating to Settlement Boundary Expansions as they relate to the GPNHS, outlined in section 2.2.8.f), options for expansion of settlement boundaries westward from the designated greenfield area in Southwest Georgetown will be made difficult due to the presence of the proposed ‘eastern link’. While we agree that there may be justification for a local linkage in this area to connect to the more robust regional linkage between the Greenbelt NHS and the NEPA (the ‘northern/southern link’), a 500m wide regional linkage (the ‘eastern link’) is unwarranted given the issues noted in the preceding comment and thus will constrain settlement boundary expansions in this area unnecessarily.</i></p> <p>Further, if the Province’s intention was to connect to the woodlands and valleylands associated with Silver Creek, as was assumed by HAPP, the proposed Secondary Plan NHS configuration east of Trafalgar Road does not facilitate this connection but rather, results in the ‘eastern link’ of the Growth Plan NHS connecting to Sixteen Mile Creek rather than Silver Creek.</p> <p>This requirement for the ‘eastern link’ is further questioned within the <i>Mapping Audit Technical Memo, Review of the Regional Official Plan Natural Heritage Systems Policies and Mapping</i>, prepared for the Region by Gladki Planning Associates et. al. dated May 2020. Section 3.2.4 provides options for refinements to the Growth Plan NHS in Halton and includes ‘Areas for Further Discussion’ that states:</p> <p><i>Patches that do not fulfill Growth Plan objectives: three of the additional polygons do not provide the intended function, for example a portion of the “Y” west of Georgetown which relies on connection being established through the SW Georgetown Area (see NS_ID 1182 in Appendix 1).</i></p> <p>A review of Appendix 1 reveals that there is no NS_ID 1182 however, NS_IDs 1122, 1127 and 1129 refer to <i>“Part of the ‘Y’ west of Trafalgar Rd in Halton Hills. Partially connects Sixteen Mile Creek to the Niagara Escarpment and partial connection to SW Georgetown”</i>. Based on this description, it is assumed that the reference within Section 3.2.4 was intended for one or all of the above noted NS_IDs rather than NS_ID 1182. Based on that assumption, each of these three areas within Appendix 1 are noted as requiring internal discussion with respect to whether this portion of the Growth Plan NHS should be retained or removed. The Natural Heritage Discussion Paper does not elaborate on the internal discussion that took place between the release of the May 2020 technical memo and the June 2020 Discussion Paper or</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

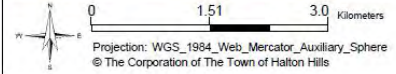
No.	Source	Submission	Response
		<p>whether it is the Region's intention to undertake those internal discussions subsequent to receiving comments on the Discussion Paper. This requires further clarification.</p> <p>Given that the 'eastern link' does not appear to fulfill the objectives to connect Sixteen Mile Creek to Silver Creek, it is questioned whether any portion of this 'Y' connection is necessary, including the 'northern link' through the Subject Lands given that it is unclear as to whether the 'northern link' was simply an extension of the 'eastern link' that no longer appears to serve a purpose from a connectivity perspective given the Secondary Plan land use designations east of Trafalgar Road.</p> <p>It is respectfully recommended that a robust connection between the Greenbelt Plan Area and the Niagara Escarpment Plan Area already exists between Regional Road 25 and Third Line at 10 Sideroad, just a couple of kilometres to the west of the 'Y' connection created by the Growth Plan NHS (Attachment 5). The creation of this second extensive connection by the Province, in proximity to an existing and more logical connection between the Greenbelt and Niagara Escarpment Plan is questionable.</p> <p>The issues raised by HAPP in 2017 and as reiterated in the Mapping Audit Technical Memo (May 2020) remain valid and should continue to be pursued by the Region through the ROPR process. It is respectfully recommended that the Region take this opportunity to request that the Province refine the Growth Plan NHS limits as provided for in Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3:</p> <p><i>4.2.2.4 Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.</i></p> <p><i>4.2.2.5 Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review.</i></p> <p><i>5.2.2.3 The Province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.</i></p> <p><u>Recommendation</u></p> <p>Based on a review of mapping from the ROPR RNHS, Growth Plan NHS, CH Online Mapping and OPA 32 mapping (Vision Georgetown Secondary Plan), as well as the <i>Natural Heritage Discussion Paper</i> (June 2020) and the Halton Area Planning Partnership 2017 submission to the Province, it is respectfully recommended that the Region request that the Province revise/remove the Growth Plan NHS along the 'Y' connection through the Subject Lands given that this NHS linkage contains limited natural heritage features, does not connect to a significant NHS on the east side of Trafalgar Road and is essentially duplicating an existing robust connection a couple of kilometres to the west. This recommendation is inkeeping with the Regional and Town Council endorsed recommendation provided by the Halton Area Planning Partnership to the Province in 2017 and a request for such a revision through a Municipal Comprehensive Review process is permitted through Growth Plan Policies 4.2.2.4, 4.2.2.5 and 5.2.2.3.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.</p> <p>Yours truly,</p> <p>Jennifer Lawrence, MCIP, RPP President</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



- Legend
- Town Boundary
 - Urban, Hamlet, Rural Area
 - Urban
 - Hamlet
 - Rural Cluster
 - Street
 - Parcel, Assessment

Notes



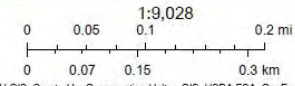
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Comments are acknowledged. Please see above for a detailed response.



10/30/2020, 10:43:16 AM

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|-----------------------|-----------------------|---------------------------|------------------------------|
| Parcels | Shoreline Hazard | Meander Belt Hazard | Waterflow |
| 100 year Flood Hazard | Headwater Floodplains | Stable Top of Bank Hazard | Regulated |
| Dynamic Beach Hazard | Floodplains Hazard | Wetlands Hazard | Hydrologic Connection |
| | | | Approximate Regulation Limit |



CH GIS, Created by Conservation Halton GIS, USDA FSA, GeoEye, Maxar, Esri, Community Maps Contributors, Province of Ontario, Esri, HERE, Garmin, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, NRCan, Parks Canada, Conservation Halton

Conservation Halton, 2020

Comments are acknowledged. Please see above for a detailed response.



10/29/2020, 4:24:37 PM

Parcels	Shoreline Hazard	Meander Belt Hazard	Waterflow
100 year Flood Hazard	Headwater Floodplains	Stable Top of Bank Hazard	Regulated
Dynamic Beach Hazard	Floodplains Hazard	Wetlands Hazard	Hydrologic Connection
			Approximate Regulation Limit

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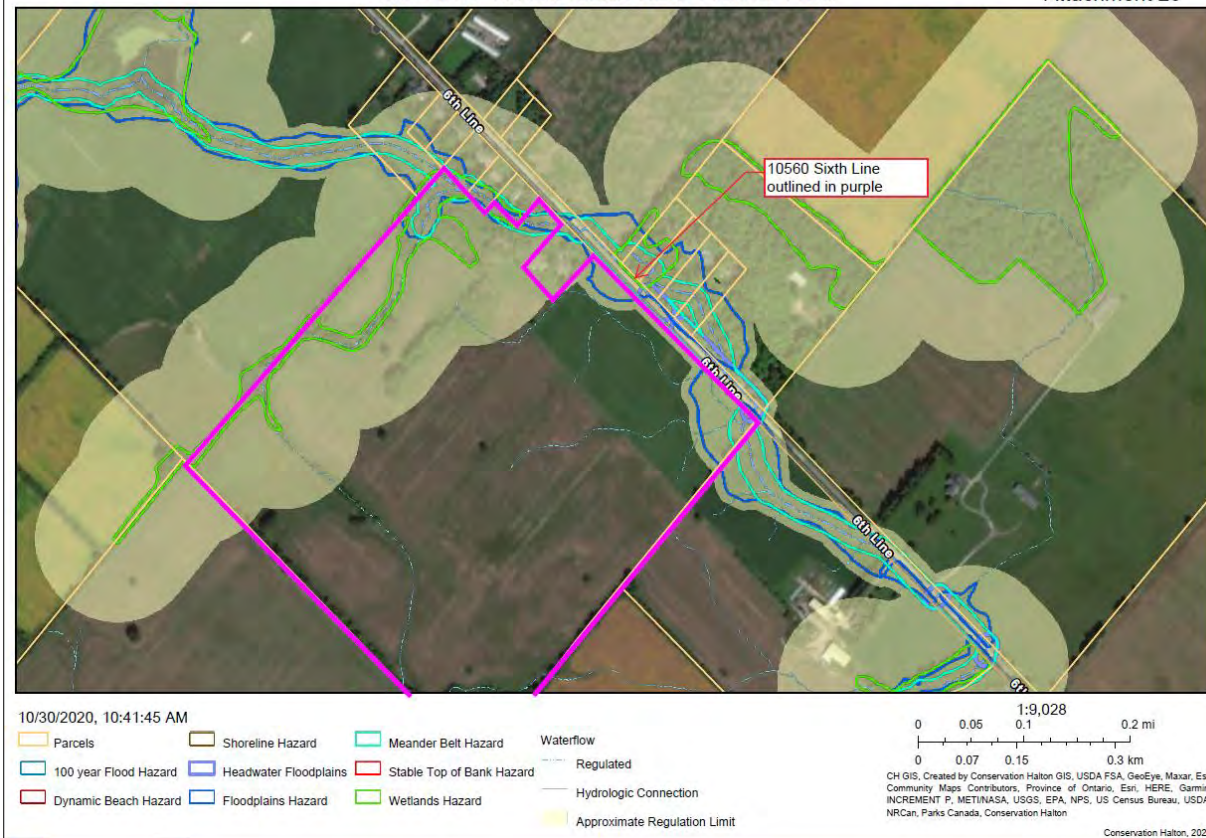
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CH GIS, Created by Conservation Halton GIS, USDA FSA, GeoEye, Maxar, Esri, Community Maps Contributors, Province of Ontario, Esri, HERE, Garmin, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, NRCan, Parks Canada, Conservation Halton

Conservation Halton, 2020

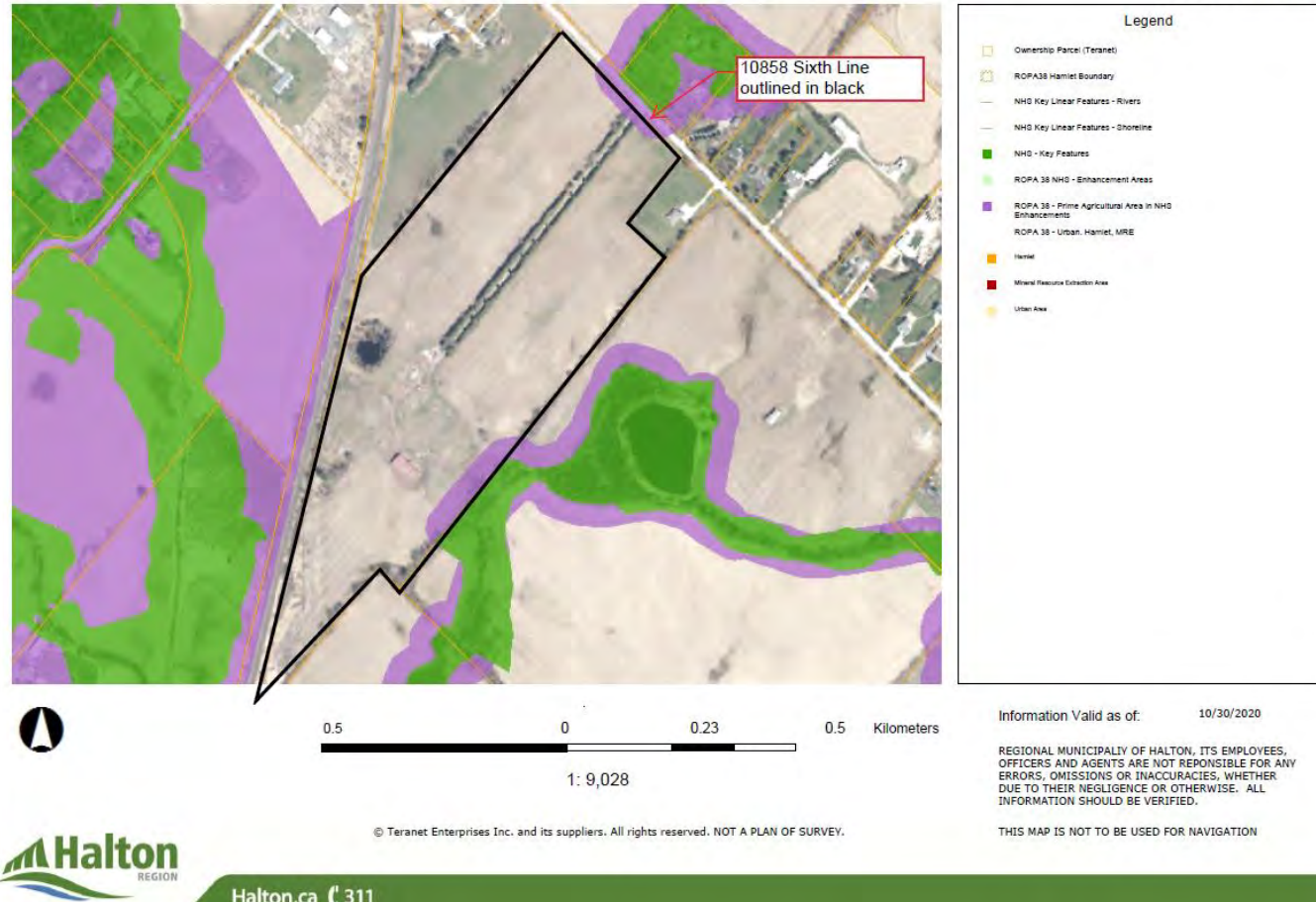
Comments are acknowledged. Please see above for a detailed response.



Comments are acknowledged. Please see above for a detailed response.

ROPA 38 RNHS - 10858 Sixth Line Halton Hills

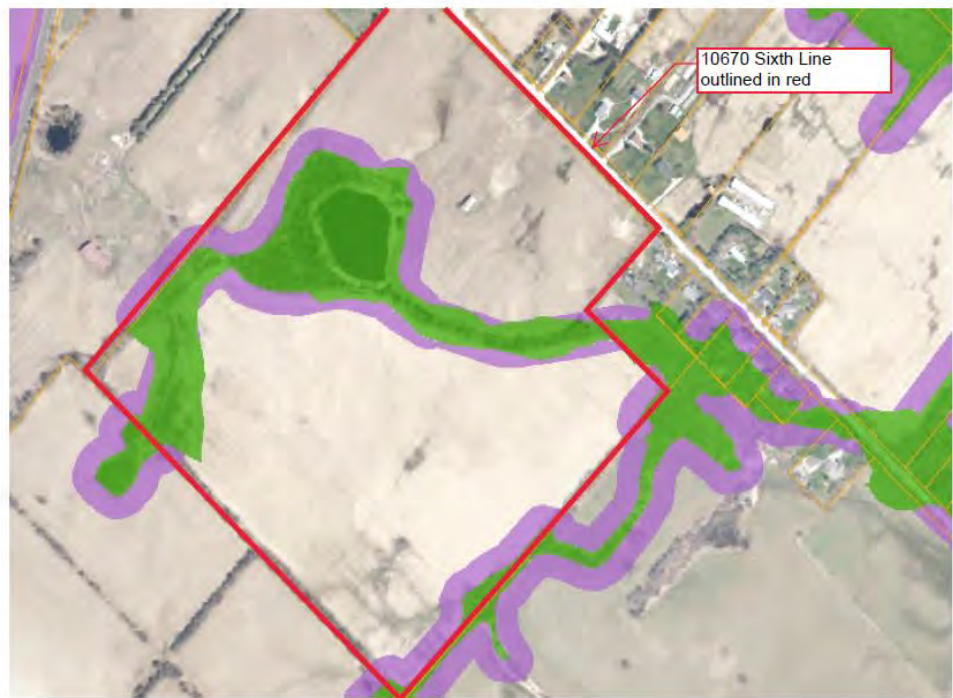
Attachment 3a



Comments are acknowledged. Please see above for a detailed response.

ROPA 38 RNHS - 10670 Sixth Line Halton Hills

Attachment 3b



Legend

	Ownership Parcel (Teranet)
	NHD Key Linear Features - Rivers
	NHD Key Linear Features - Shoreline
	NHD - Key Features
	ROPA 38 NHD - Enhancement Areas
	ROPA 38 - Prime Agricultural Area in NHD Enhancements
	ROPA 38 - Urban, Hamlet, MRE
	Heritage
	Mineral Resource Exhibition Area
	Urban Area



0.5 0 0.23 0.5 Kilometers



1: 9,028

Information Valid as of: 10/29/2020

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Comments are acknowledged. Please see above for a detailed response.

ROPA 38 RNHS - 10560 Sixth Line Halton Hills

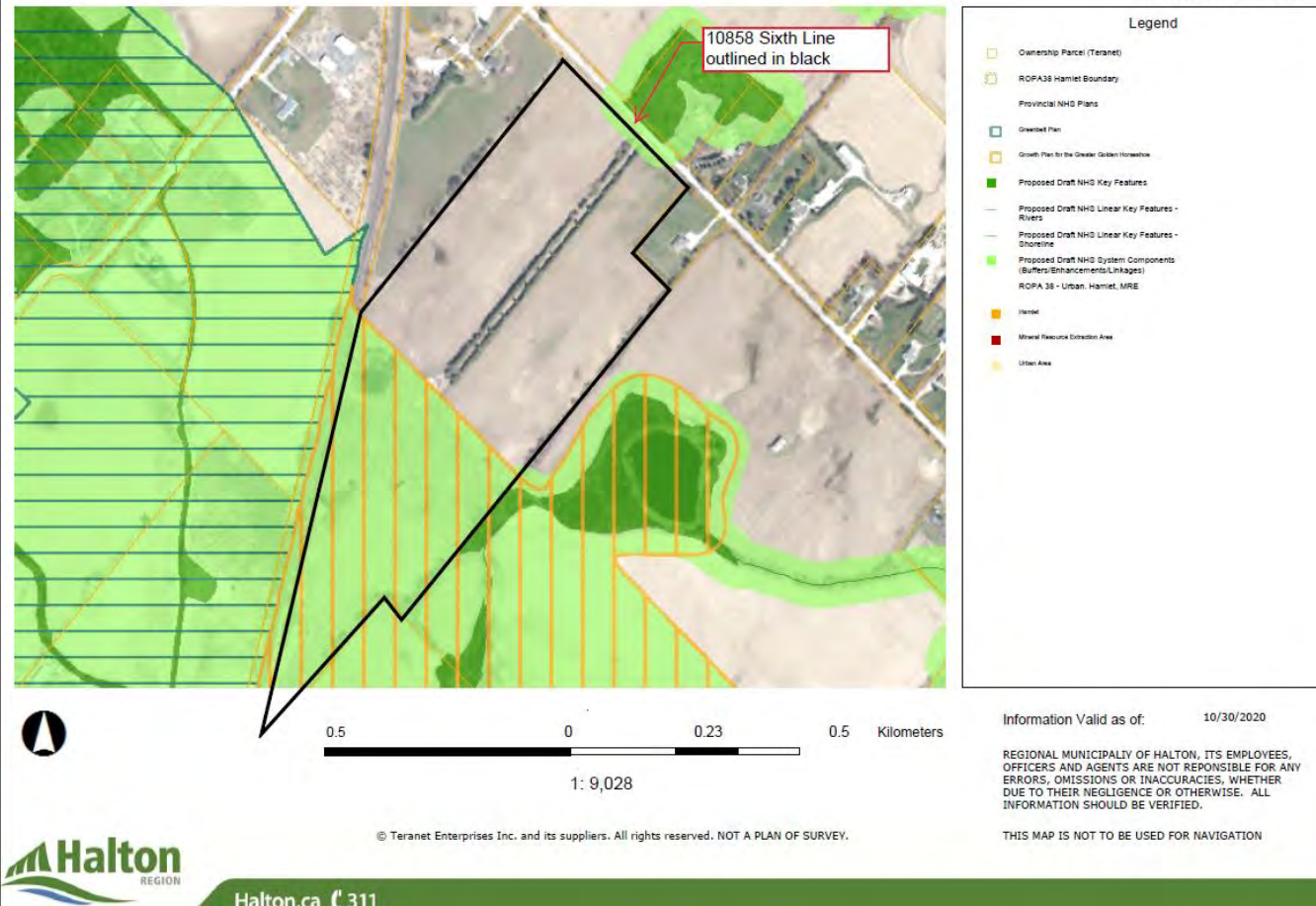
Attachment 3c



Comments are acknowledged. Please see above for a detailed response.

ROPR RNHS - 10858 Sixth Line Halton Hills

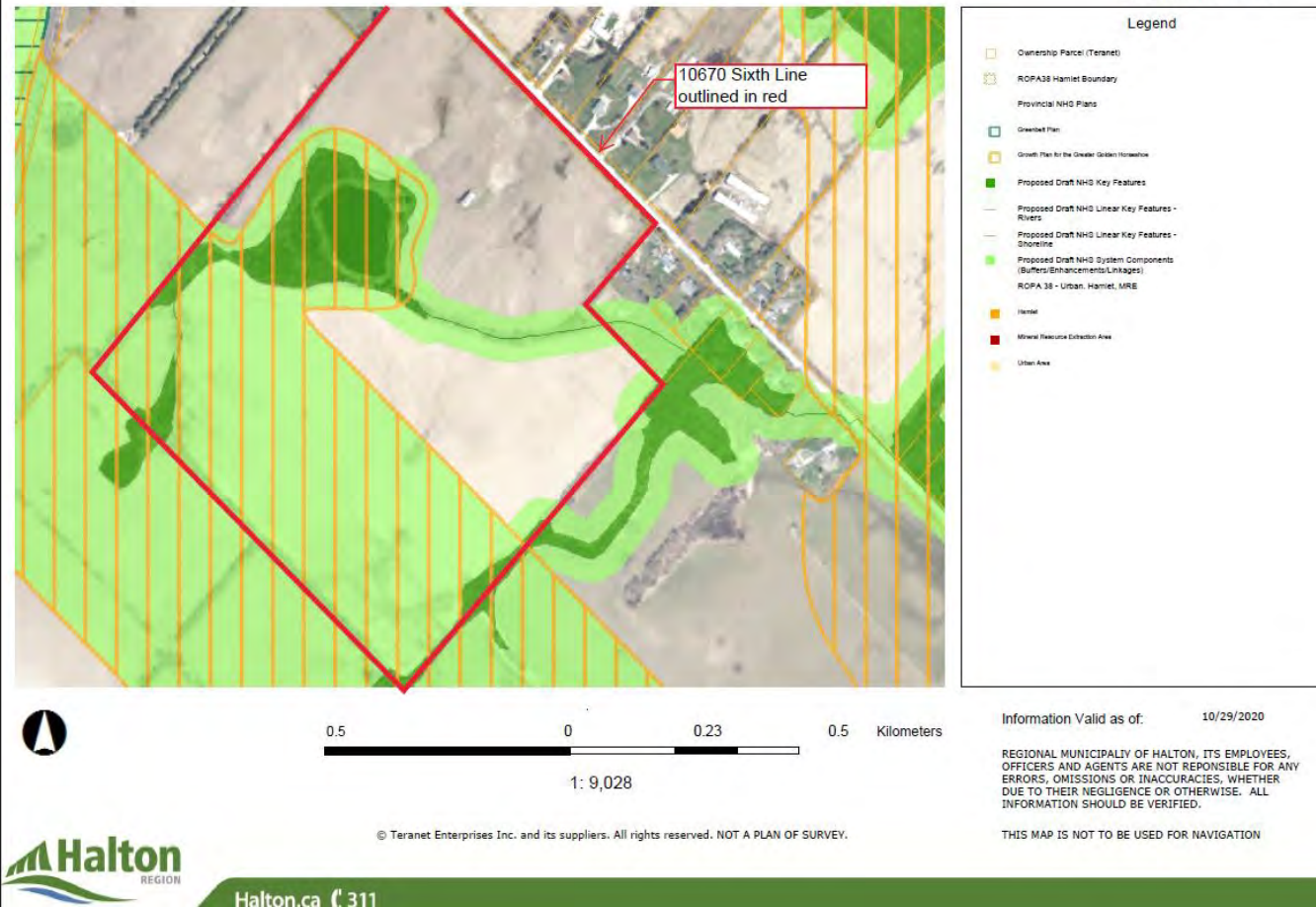
Attachment 4a



Comments are acknowledged. Please see above for a detailed response.

ROPR RNHS - 10670 Sixth Line Halton Hills

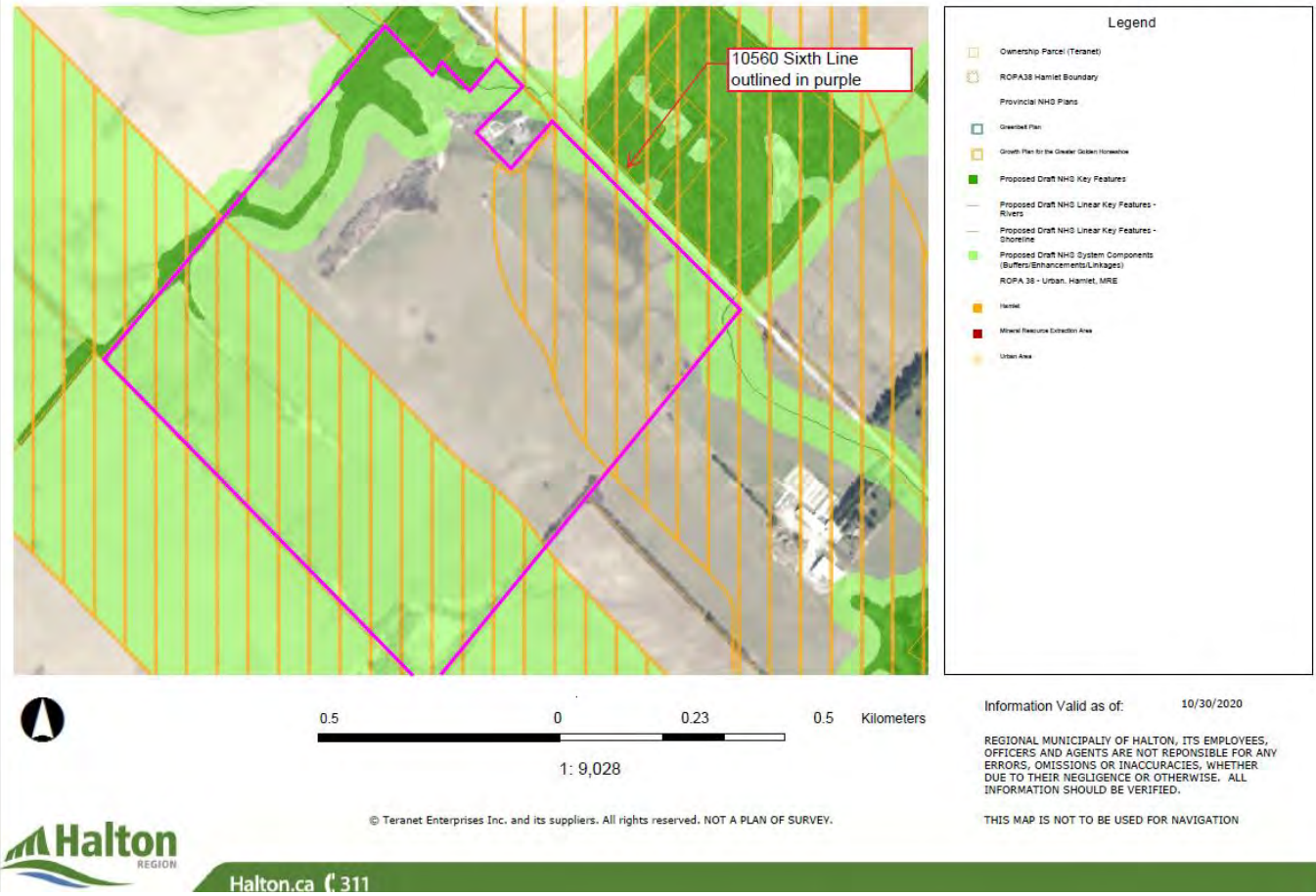
Attachment 4b



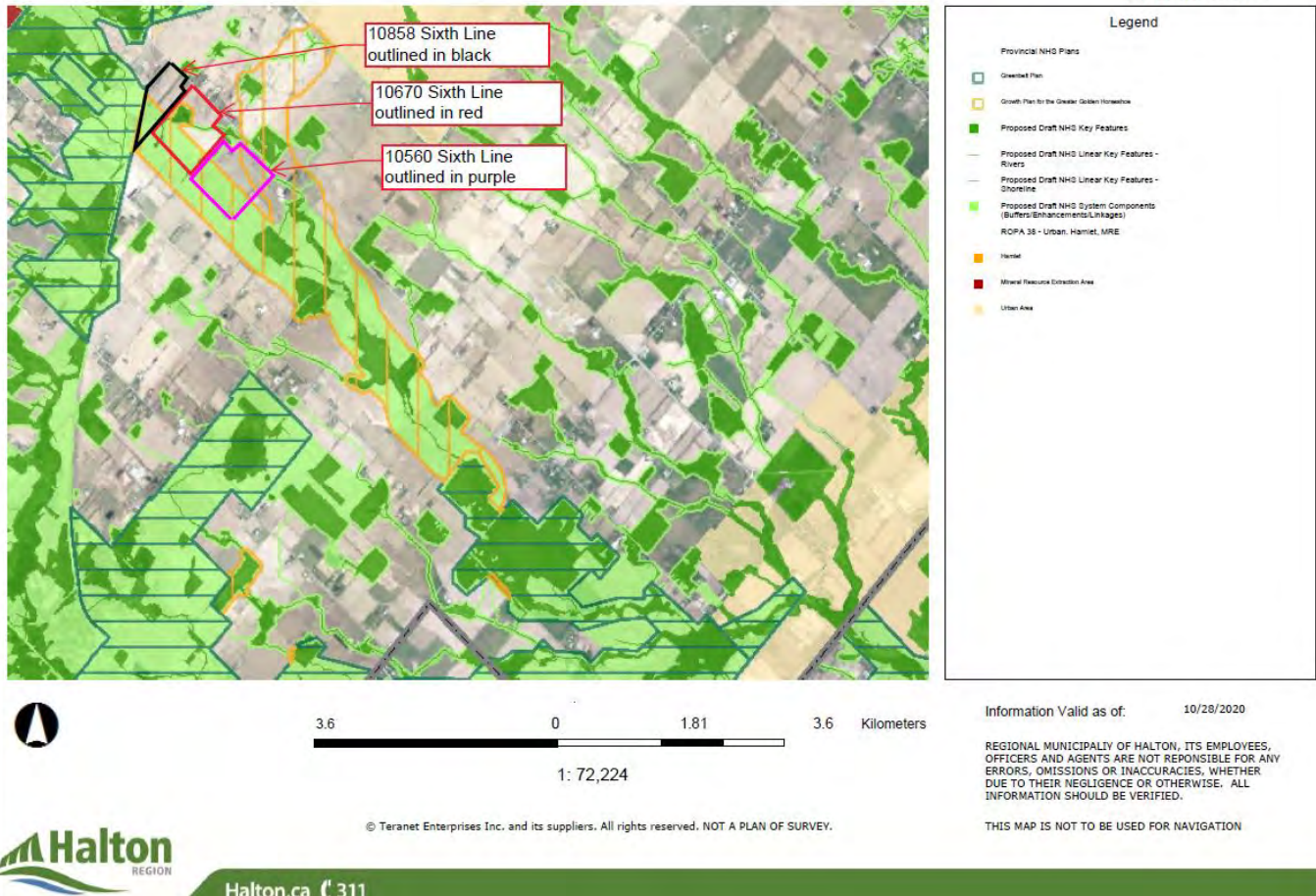
Comments are acknowledged. Please see above for a detailed response.

ROPR RNHS - 10560 Sixth Line Halton Hills

Attachment 4c



Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
		 <p style="text-align: center;">ROP R NHS Overview -10560, 10670 & 10858 Sixth Line Attachment 5</p> <p>10858 Sixth Line outlined in black 10670 Sixth Line outlined in red 10560 Sixth Line outlined in purple</p> <p>Information Valid as of: 10/28/2020 REGIONAL MUNICIPALITY OF HALTON, ITS EMPLOYEES, OFFICERS AND AGENTS ARE NOT RESPONSIBLE FOR ANY ERRORS, OMISSIONS OR INACCURACIES, WHETHER DUE TO THEIR NEGLIGENCE OR OTHERWISE. ALL INFORMATION SHOULD BE VERIFIED. THIS MAP IS NOT TO BE USED FOR NAVIGATION</p> <p>© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p> <p>Halton REGION Halton.ca 311</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
25.	Agerton New Urban Ltd. Landowner Group	<p>Attached per email dated 2020-10-30 (SGL Planning)</p> <p>Re: Regional Official Plan Review Discussion Papers Agerton New Urban Ltd. Landowner Group Comments</p> <p>SGL Planning & Design is the planning consultant to the Agerton New Urban Ltd., a Landowners Group in Milton.</p> <p>Agerton New Urban Ltd. is comprised of a group of landowners who own approximately 240 hectares of land in the Agerton Secondary Plan Area. The Agerton Secondary Plan Area is located along Trafalgar Road between Highway 401 and Derry Road. The Town of Milton has undertaken a considerable amount of work in preparation of a draft secondary plan for the Agerton area. Central to the Agerton area is a proposed new GO Station at Trafalgar Road on the Milton line. Town Council endorsed the Secondary Plan in March 2019 but cannot adopt it due to the need for conversion of employment lands to mixed use through the Region’s Municipal Comprehensive Review (MCR) process.</p> <p>We have been asked to provide comments, on behalf of Agerton New Urban Ltd., on the Discussion Papers issued by the Region as part of the Regional Official Plan Review. We have been assisted by Stonybrook Consulting Inc. and Savanta – A GEI Company.</p>	<p>Natural Heritage</p> <p>Regional staff continues to support the RNHS policy framework and believes it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application.</p> <p>Regional staff notes the following in regards to Agerton New Urban Ltd. Landowner Group’s responses to the Discussion Questions from the Natural Heritage Discussion Paper presented in Appendix D of your submission:</p> <p>The policy directions for Natural Heritage (i.e., NH1 to NH-11) were informed by feedback received from groups including the public, stakeholders, and agencies. Policy directions to address comments received include, but are not limited, to the following:</p> <ul style="list-style-type: none"> • a harmonized approach for the Provincial NHS mapping and policies;

No.	Source	Submission	Response
		<p>We have reviewed the Town's submission and support the comments and recommendations of their letter.</p> <p>The following submission provides our comments on questions raised in four of the Region's five Discussion Papers: Natural Heritage, Climate Change, Rural and Agricultural and Regional Urban Structure. Our comments focus on implications for the Agerton Secondary Plan area, and therefore we have not provided comments on matters and questions that are beyond the Secondary Plan.</p> <p>Summary of Comments</p> <p>In the Natural Heritage Discussion Paper, suggestions are made to simplify the multiple approaches to the Natural Heritage System. While this approach may be appropriate in the rural area where multiple Provincial approaches apply, it is inappropriate to apply Provincial policies applicable to a rural geography in an urban settlement area. There should be a specific and different set of policies for Settlement Areas verses the approach in the Greenbelt and Growth Plan NHS which apply in the rural area, as Settlement Areas need to address and balance a variety of objectives within a finite land area.</p> <p>In regard to the concept of a precautionary principle, we do not support adding specific reference to a precautionary principle to ROP policy. Including specific reference to a precautionary principle will not add clarity but rather will leave many policies wide open to interpretation, thereby adding increased uncertainty to policy interpretation.</p> <p>With respect to buffers, they should not be pre-determined, or minimums established at an ROP level without studying the type and sensitivity of specific natural heritage features, the type of adjacent land use, and identification of other mitigative measures, etc., that can only be addressed in detail through area-specific or site-specific studies. Further, it is the Agerton New Urban Ltd.'s position that the Buffer Refinement Framework should not be incorporated in policy or in any guidelines.</p> <p>It is preferred that the Natural Heritage System and Water Resource System be addressed in separate policies. While there are functional relationships and overlap between the two, some policies applicable to the two systems are different including policies for Key Hydrologic Areas. We also expect that these policies will differ within and outside of Settlement Areas. As such, Option 2 presented in the Natural Heritage Discussion Paper (addressing these systems separately) is preferred.</p> <p>For mapping of natural hazards, if mapped at a regional scale, floodplains should be an overlay.</p> <p>With regard to the Rural and Agricultural System Discussion Paper, Agricultural Impact Assessments (AIA) are an appropriate tool to assess impacts and mitigation measures in a number of instances referred to in the ROP including for expansions of Settlement Area boundaries. However, an AIA should not be required once lands are within a Settlement Area boundary.</p> <p>The Regional Urban Structure Discussion Paper should be updated, or an Addendum Report prepared to review the fundamental changes to Provincial policy contained in Amendment 1 to the Growth Plan and to reflect the 2020 Provincial Policy Statement. These changes include a planning horizon to 2051 and commensurate forecasts for that time period along with policy changes requiring a focus on market-based range and mix of housing among other policy changes.</p>	<ul style="list-style-type: none"> • excluding the NHS for the Growth Plan from settlement area boundaries in Halton; • maintaining the goals and objectives for the RNHS; • providing guidelines for clarification on how linkages, enhancements, and buffers are established; • address woodland quality in the determination of significant woodlands. • incorporating new policies and mapping to implement a Water Resource System; • updating policies to conform to the three Source Protection Plans that apply to Halton Region; • introducing a new section on Natural Hazards in the ROP to introduce policies that are consistent with the Provincial Policies and Plans and direct Local Municipalities to include policies and mapping in their Official Plans; <p>More fulsome details are available in the Policy Directions Report. Please note that any refinements to the Regional Natural Heritage System must be completed in accordance with Policy 116.1 through a Subwatershed Study or Environmental Impact Assessment accepted by the Region through an approval process under the Planning Act. South Milton Urban Expansion Area Subwatershed Study has not been accepted by the Region and is currently under review. Furthermore, the Natural Heritage Policy Direction NH-7 that an update to the policy is made to incorporate refinements to the Regional Natural Heritage System accepted by the Region through an approval process under the Planning Act occur on a more frequent basis than at the Region's statutory review of its Official Plan. This will ensure that Halton's Natural Heritage System mapping reflects the most current data available and thus the maps are as accurate as possible at a regional-scale. The revisions to policies and mapping for Halton's Natural Heritage Theme will occur through the 3rd Regional Official Plan Amendment during Phase 3 of the ROPR. Regional staff will continue to review the suggestions put forward in this submission through that ROPA.</p> <p>Rural and Agricultural System</p> <p>Policy Direction RAS-4 outlines the proposed direction for Agricultural Impact Assessments and recommends that policies provide greater specificity for when an Agricultural Impact Assessment is required: settlement area boundary expansions, new or expanding mineral aggregate operations, infrastructure in the rural area, and any proposed development that removes land from Prime Agricultural Areas. RAS-4 is also recommended that the Regional Official Plan continue to reference Regional Agricultural Impact Assessment Guidelines and review the Guidelines for consistency per any updates to Provincial guidance documents. Comments regarding secondary plan mitigation</p>

No.	Source	Submission	Response
		<p>In implementing other Provincial policy directives such as Strategic Growth Areas, transit supportability and supporting employment growth, the ROP should set objectives and higher level policy direction while providing flexibility for the local municipalities to implement these concepts taking into account local context. In many cases, these Provincial policy directions are best implemented at the secondary plan stage by the local municipality.</p> <p>In applying new Provincial tools such as Inclusionary Zoning and Protected Major Transit Station Areas, the ROP needs to consider the local context of the MTSA. Not all MTSA's are alike. Those in greenfield settings where the urban area and market has not been established need to be treated differently than those in established urban areas with strong markets for high density development and also greater concerns for that housing form. Newly established greenfield areas require greater flexibility to attract the higher density housing market.</p> <p>In establishing a minimum Designated Greenfield Area (DGA) density target, the Region needs to be cognizant of the Provincial planning directive to accommodate a market-based mix of housing. To achieve an intensification target of 50%, a significant proportion of multi-unit housing will need to be directed to intensification areas. As a result, the DGA should include a mix of housing types but with focus on lower density housing products in order to provide a housing mix that meets market needs. Therefore, 50 residents and jobs per hectare in the DGA is an appropriate density target.</p> <p>For conversion of employment areas, the ROP should be clear that the role of Local Urban Structure and the policies on accommodating significant population and employment growth could be established through secondary plans such as the Agerton Secondary Plan.</p> <p>With respect to the Climate Change Discussion Paper, it is important for the ROP to consider the practical realities and limitations of development as new targets are being set. Collaboration with landowners and the local municipality is essential to create realistic and implementable targets, programs and initiatives.</p> <p>Any climate change policies need to have flexibility to allow for innovation and changing technologies. The Region should consider options for incentives to encourage innovation in mitigation and adaptation.</p> <p>A critical factor in reducing Greenhouse Gas emissions is walkable communities. Creating these communities is not simply about adding sidewalks. It involves providing destinations to walk to, making it comfortable to walk along the roads, providing a mix of land uses within walking distance and providing higher densities to support transit along transit corridors. The planning for these land use arrangements and streetscape design can and should be done at the local level through secondary plans and this should be acknowledged in the ROP. However, the Region has a role to plan in the design of Regional Roads. These roads need to be humanized – wider and faster is not conducive to walkability or to reducing Greenhouse Gas emissions.</p> <p>Natural Heritage Discussion Paper Questions</p> <p>1. As required by the Growth Plan, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan. Based on options outlined in Section 3.3, what is the best approach in incorporating the NHSGP into the ROP?</p> <p>The Natural Heritage System for the Growth Plan does not apply in Settlement Areas and the Discussion Papers confirm that. We agree with that interpretation. Although this matter does not directly impact the Trafalgar Corridor, it would apply immediately adjacent to some of the landowners' lands.</p>	<p>policies and assessment and AIA requirements for lands within a Settlement Area boundary have the opportunity to be considered and explored during the policy formulation stage of the ROPR.</p> <p>Comments regarding permitting cemeteries in the Rural Area are being considered through Policy Direction RAS-3. RAS-3 outlines the recommended approach for permitting cemeteries within the proposed Rural Lands designation. Consultation on cemeteries revealed a preference for cemeteries to be directed to settlement areas, but suggestions were also made regarding cemeteries being permitted on rural lands to meet unmet demands, support complete communities, and satisfy other criteria. It was also recommended that details such as cemetery size be determined by local municipalities. Additionally, there was broad support from consultation to restrict cemeteries in prime agricultural areas as these areas are a valuable and finite resource. Uses suggested to be included in the Greenbelt Plan Area are subject to policies within the Greenbelt Plan. Additional compatible uses proposed in the rural area have the opportunity to be considered and explored during the policy formulation stage of the ROPR.</p> <p>Regional Urban Structure Discussion Paper</p> <p>Regional staff notes that comments on the Regional Urban Structure Discussion Paper/Integrated Growth Management Strategy (IGMS) have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through the Preferred Growth Concept materials, including the Submissions Charts. More details are also available in the IGMS Policy Directions.</p> <p>Climate Change</p> <p>The Preferred Growth Concept that is being recommended through the Regional Official Plan Review addresses climate change mitigation objectives through energy and emission reductions by planning for complete communities and a compact urban form. It has a planned mix of land uses and a mix of housing type, tenure, and affordability to encourage the workforce to live within the community. It supports existing and planned transit, by directing development to strategic growth areas including those around GO stations and other planned higher order transit corridors. Halton's local municipalities play an important role in helping to address these objectives by undertaking detailed land use planning to ensure that these strategic growth areas are planned to be compact, mixed-use, energy-efficient, and transit-supportive, complete communities. The Preferred Growth Concept addresses climate change adaptation objectives by minimizing the amount of new urban land to be designated, thus limiting the loss of agricultural land in Halton Region and Halton's local municipalities and also limiting urban development impacts on the Natural Heritage System.</p>

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		<p>Option 2 (Harmonize the Provincial NHSs) is preferred for incorporating the Natural Heritage System of the Growth Plan into the ROP.</p> <p>In this scenario, layers for the Natural Heritage System for the Growth Plan (NHSGP) and the Greenbelt Natural Heritage System (GBNHS) would be combined and added as an overlay to the Regional NHS. This scenario would allow for different approaches where the Greenbelt Plan and Growth Plan NHS apply and not apply those context specific policies to the entirety of the Rural Area. There would be overlap of policies between the NHSGP and GBNHS, but the differences could be reconciled through policy. This scenario would help to simplify Provincial policy and would allow flexibility to include policies that reflect local considerations for the Regional NHS, rather than have the more restrictive policies apply as in Option 3.</p> <p>No matter the approach taken, there should be a specific and different set of policies for Settlement Areas verses the approach in the Greenbelt and Growth Plan NHS which apply in the rural area.</p> <p>2. RNHS policies were last updated through ROPA 38. Are the current goals and objectives for the RNHS policies still relevant/appropriate? How the can ROP be revised further to address these goals and objectives?</p> <p>Section 114 of the ROP states, “The goal of the Natural Heritage System is to increase the certainty that the biological diversity and ecological functions within Halton will be preserved and enhanced for future generations.” The Natural Heritage Discussion Paper notes that this goal has supported the application of the precautionary principle in relation to analysis of proposed NHS impact avoidance and mitigation measures (i.e., faced with uncertainty, err on the side of being conservative in the protection of natural heritage components).</p> <p>With reference to the above goal, the Natural Heritage Discussion Paper includes discussion on an option to enshrine a new precautionary principle in policy. With respect to Section 114, the Discussion Paper notes,</p> <p>“In the Successes section above, ROP 114 was identified as critical in supporting a precautionary principle approach to protecting the NHS. This policy has been interpreted that there has to be a high degree of confidence that proposed protection and mitigation measures will work. It draws on the concept of “Landscape Permanence” in the Vision as justification for erring on the conservative side when it comes to mitigation like buffer widths and appropriate uses in the buffers”.</p> <p>We do not support adding specific reference to a precautionary principle in ROP policy. Current ROP RNHS policies and mapping provide detailed direction on the protection, restoration and management of the RNHS and requirements for future studies. Including specific reference to a precautionary principle will not add clarity but rather will leave many policies wide open to interpretation, thereby adding increased uncertainty to policy interpretation.</p> <p>3. Based on the discussion in Section 4.2, to ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?</p> <p>The Natural Heritage Discussion Paper discusses an option to include new policies for minimum buffers or vegetation protection zones for different natural heritage feature types, as was done in the Greenbelt</p>	<p>Policy Direction CC-5 recommends the introduction of new policies in the ROP that encourage the local municipalities to introduce and/or enhance green development standards for new developments. This could include standards for energy conservation efficiency, permeable surfaces, and electric vehicles and their infrastructure. Regional staff will explore developing a best practices resource for green development standards which local municipalities may consider when introducing and/or updating their standards. Regional staff recognizes the work the local municipalities have undergone in the development of their green development standards and will continue to support local work on green development standards where appropriate, rather than embedding these standards into ROP policy. Concerning energy and utilities, Policy Direction CC-6 recommends Community Energy Plans to be a requirement of the area-specific planning process and that Regional staff develop guidance for the local municipalities to assist with implementation. Community Energy Plans will look at the feasibility of energy generation, distribution, and storage, reduction of energy consumption and greenhouse gasses, and opportunities for district energy and renewable energy sources at a neighbourhood scale. Policy Direction CC-6 will also direct Regional staff to develop policies that promote net-zero communities, renewable energy systems, alternative energy systems, and district energy systems.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region’s Strategic Business Plan 2019-2022 and Council’s emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region’s work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>

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		<p>Plan and Growth Plan NHS (that applies only outside of Settlement Areas). It also suggests that the role and use of the Region's Buffer Refinement Framework (2017) could be clarified through policy or Council endorsed guidelines.</p> <ul style="list-style-type: none"> • Minimum Buffers - With respect to Settlement Areas, the inclusion of new policies describing minimum standards to ease the implementation of buffers is not supported. Buffers should not be pre-determined, or minimums established without the appropriate level of study of the type and sensitivity of specific natural heritage features, the type of adjacent land use, identification of other mitigative measures, etc., that can only be addressed in detail through future area-specific or site-specific studies. • Region's Buffer Refinement Framework - There has been much disagreement with the content and use of this document. The Framework is based on selective conclusions from the Ecological Buffer Guideline Review (CVC 2012). The Framework recommends a minimum 30m buffer from all Key Features and that limited refinements may be made through further study. We note that the CVC (2012) report identified several other considerations and conclusions not acknowledged in the Region's Buffer Framework including: <ul style="list-style-type: none"> ○ not every feature requires a buffer; ○ buffers as little as 1m can be effective (depending on the feature and the potential impact); ○ a 30m buffer was not determined to be the best/only tool to protect natural features. <p>Agerton New Urban Ltd., through the overall Milton Phase 4 Landowners Group, has consistently advised the Region of their position since the initial release of the Buffer Refinement Framework. The Milton Phase 4 Group submission (Goodmans, 2017) noted that the Framework would impose restrictions on the buffer refinement exercise set out in ROP policy and based on unsubstantiated and generic assumptions could undermine scientific investigations at future study stages. As a result, it is Agerton New Urban Ltd.'s position that the Buffer Refinement Framework should not be incorporated in policy or in any guidelines.</p> • 30m Buffers - We note the comment in the Background Review Technical Memo that states, "It is taken for granted that the buffers are as mapped on Map 1G, and that they are refined from that, as opposed to being determined." For mapping purposes, 30m buffers were applied to many Key Features. <p>Buffers were one of the many NHS matters addressed through the Ontario Municipal Board hearing for ROPA 38. Through the ROPA 38 OMB mediation, there was no agreement on a 30m buffer width requirement. As a result, 30m buffers were not included in policy and therefore, they should not be taken for granted as such or be the starting point for NHS refinements permitted in Section 116.1. Buffers should continue to be addressed through future studies, as noted in Section 116.1. They should be determined based on area-specific or site-specific studies when specific features and functions as well as adjacent land use are better understood, when they can be identified along with other appropriate mitigation measures, and balanced with all aspects of creating complete communities. Land is finite. Setting buffers must consider the sensitivities of the natural heritage features as well as balance the competing interests of create a complete community that meets all Provincial, Regional and Town planning directives. Setting buffers without regard for the implications for all planning directives is not good planning and may negatively impact other important policy priorities.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>4. Given the policy direction provided by the PPS and Provincial plans, how should policy and mapping address the relationship between natural heritage protection and agriculture outside of the Urban Area or the Natural Heritage System? Options are provided in Section 5.3.</p> <p>No comment.</p> <p>5. The Greenbelt Plan 2017 and Growth Plan 2019 require municipalities to identify Water Resource Systems (WRS) in Official Plans. Based on the two (2) options provided in Section 6.3, how should the WRS be incorporated into the ROP?</p> <p>The Natural Heritage Discussion Paper presents two options for the incorporation of the WRS into the ROP. It notes that a key consideration is whether the NHS and WRS should be addressed in an integrated fashion or separately. Options include combining NHS/WRS policies and mapping or separating NHS/WRS policies and mapping. The Natural Heritage Discussion Paper notes that the approach to combining the NHS/WRS policies could present a common set of policies for Key Heritage Features and Key Hydrologic Features and a separate set of policies for Key Hydrologic Areas.</p> <p>It is preferred that the NHS and WRS be addressed in separate policies. While there are functional relationships and overlap between the NHS and WRS, some policies applicable to the two systems are different including policies for Key Hydrologic Areas. We also expect that these policies will differ within and outside of Settlement Areas. As such, Option 2 presented in the Natural Heritage Discussion Paper (addressing these systems separately) is preferred.</p> <p>Based on our review of the Technical Memos, we have several others comments on the WRS. See Attachment A for comments on the Technical Memos.</p> <p>6. Preserving natural heritage remains a key component of Halton’s planning vision. Should Halton Region develop a Natural Heritage Strategy and what should be included in such a strategy?</p> <p>No comment.</p> <p>7. Should the ROP incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p> <p>No comment.</p> <p>8. The Regional Official Plan is required to conform to applicable Source Protection Plans and must be updated through this ROPR process. What is the best approach to address Drinking Water Source Protection policies and mapping?</p> <p>The Region of Halton is subject to two Source Protection Plans, the Halton and CTC plans. These two plans have varying policy directions regarding the protection of municipal drinking water, and those policies apply to specific geographic areas. The Source Protection Plans also identify those policies which must be incorporated into the Official Plan and Zoning By-laws. For the areas subject to the Source Protection Plan policies, the preferred implementation approach is that the Official Plan identify these areas as subject to the applicable Source Protection Plan, direct the user of the Official Plan to where they can find the full Plan and amend the Official Plan only as required by Source Protection Plan policies</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>to achieve conformity to those Plans. This is a similar approach used in years past for the implementation of the Parkway Belt West Plan.</p> <p>9. The ROP is required to conform to the updated Natural Hazard policies in the PPS. What is the best approach to incorporate Natural Hazard policies and mapping?</p> <p>Natural Hazards in the PPS include hazardous lands, flooding hazards, erosion hazards, dynamic beach hazards and wildland fire. The NHDP notes that changes are needed to the ROP to incorporate new PPS policies since approval of ROPA 38. It outlines three options to identify Natural Hazards in mapping including:</p> <ol style="list-style-type: none"> 1. Create a separate Schedule in the ROP that maps the Natural Hazards; 2. On the RNHS schedule (Map 1G), show the Natural Hazards as an overlay; and 3. Do not map Natural Hazard in the ROP but rather include additional policies to direct the Local Municipalities to map Natural Hazards in their Official Plans. <p>Conservation Authorities have floodplain mapping for some but not all areas in their watersheds and the level of detail of their mapping varies which raises questions as to the accuracy of the mapping. In many cases, they overlap with other NHS components and, unlike some NHS components may be modified and the Conservation authority will issue permits for development and site alteration. It is important that policies clearly permit modifications to floodplains based on site-specific studies. Due to these considerations, if mapped at a regional scale, floodplains should be an overlay.</p> <p>Erosion hazard mapping is not typically mapped until area-specific or site-specific studies are completed as site-specific fieldwork and analyses are required to accurately do so. Erosion hazards cannot be reasonably mapped at regional or local municipal scales and therefore should not be included in any regional mapping. Further, it is not reasonable to expect or necessary that local municipalities map erosion hazards in their official plans. Rather, policies should include the requirement to identify erosion hazards during area-specific and/or site-specific studies.</p> <p>10. How can Halton Region best support the protection and enhancement of significant woodlands, through land use policy?</p> <p>The Natural Heritage Discussion Paper notes that through the next phase of the ROPR, consideration should be given to reviewing the definition of woodlands and significant woodlands to include quality, woodland changes over time and the MNRF Renewable Energy guidelines.</p> <ul style="list-style-type: none"> • Woodland Quality – The Natural Heritage Discussion Paper suggests that the definition of woodlands and significant woodlands be revised to include criteria to address the quality of the woodland (e.g., extent of invasive tree species and extent of presence of dead trees) in addition to the existing four criteria. The Natural Heritage Discussion Paper notes that the ‘Technical Definitions and Criteria for Key Natural Heritage Features in the Natural Heritage System of the Protected Countryside Area Paper’ (OMNR 2005 – updated 2012) considers woodland quality by considering the extent of non-native trees species present within the woodland, and states that a decision is required whether this approach should be Region-wide or not. The Natural Heritage Discussion Paper continues by stating that non-native tree species, just like native tree species, help mitigate climate change, assist in maintaining a healthy hydrological cycle and provide wildlife habitat. It is suggesting that any changes to the definition of significant woodland must consider maintaining and enhancing such ecological functions as part of the NHS. The Natural Heritage 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Discussion Paper implies that consideration should be given to provide greater protection to woodlands characterized by invasive tree species.</p> <p>However, further review of OMNR (2012) reveals that communities dominated by invasive non-native trees be considered an exclusion to significant woodlands, not an inclusion as implied in the Natural Heritage Discussion Paper:</p> <p style="padding-left: 40px;">“Additional exclusions may be considered for communities which are dominated by the invasive non-native tree species Buckthorn (Rhamnus species) or Norway Maple (Acer platanoides) that threaten good forestry practices and environmental management. Such exceptions may be considered where native tree species cover less than 10% of the ground and are represented by less than 100 stems of any size per hectare.”</p> <p>Therefore, updating the definition of woodlands and significant woodlands to include those characterized by invasive tree species and providing such woodlands with greater protection are not supported.</p> <ul style="list-style-type: none"> • Woodland Changes - The Natural Heritage Discussion Paper suggests that ROP 295, definition of ‘woodland’, should be similar to the Greenbelt Plan technical paper by including wording such as: “woodlands experiencing changes such as harvesting, blowdown or other tree mortality are still considered woodlands. Such changes are considered temporary whereby the forest still retains its long-term ecological value.” This definition was created in 2012, prior to extreme weather events becoming more common and prior to the detrimental infestation of the Emerald Ash Borer. This provincial definition was also created specifically for woodlands within the Greenbelt Plan that are located within the Protected Countryside. <p>Including ‘or other tree mortality’ in the woodland definition could include some tree mortality scenarios that no longer support the structure or function of a woodland. For example, Emerald Ash Borer is currently impacting many woodlands. Consideration must be applied to the extent of the impact and the associated regeneration. If a canopy and sub-canopy have succumbed to the Ash Borer, the species composition and coverage of the understory and ground cover should then determine the community type and function.</p> <p>Therefore, revising the woodland definition to one that is similar to the Greenbelt Plan technical paper is not supported.</p> <ul style="list-style-type: none"> • MNRF Renewable Energy Guideline - Table 3, Implementation Comments, Successes and Barriers from the Policy Audit Technical Memo includes discussion on possible changes to the Significant Woodland definition. Comment 80 includes the following: <p style="padding-left: 40px;">“The PPS definition of Significant Woodland was revised in 2014 edition to include reference to “criteria established by the Ontario Ministry of Natural Resources”. The Region’s Significant Woodland criteria may require update to reflect MNRF criteria. Although the OMNR does not technically exist (OMNRF vs. OMNR) and the OMNRF has not established criteria that is linked explicitly to the PPS 2014, they frequently identify criteria developed for the purpose of Natural Heritage Assessment for Green Energy Act Projects as a suitable proxy Guideline. They will likely request us to consider these as part of our review in relation to our Significant Woodlands definition.”</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>The question regarding the use of the MNR's document relating to Green Energy Act Projects was clarified with MNRF Aurora District in December 2018. At that time, MNRF clarified that the Natural Heritage Reference Manual is the appropriate guidance to be used for residential projects. The Renewable Energy guide is applicable to energy projects specifically. See the email correspondence (Hilditch:Funnell, December 13/14, 2018) in Attachment B. As per this clarification, changes to the Significant Woodland definition should not be made to include the Renewable Energy guidance.</p> <ul style="list-style-type: none"> • Interpretation of Patches - Based on experience with the current Significant Woodland definition, clarification would be helpful regarding the definition of 'patches' in the portion of Policy 277(1) referring to forest <i>patches</i> over 99 years old (italics added for emphasis). 'Patch' is not defined in the ROP. The wording should be clarified by replacing the word 'Patch', i.e., the Woodland contains an abundant amount of native trees over 99 years old. <p>Finally, the Natural Heritage Discussion Paper notes that dead trees provide value to Significant Wildlife Habitat and that dead trees should be considered a potential Enhancement Area to the NHS. While it is recognized that Significant Woodlands and Significant Wildlife Habitat may overlap, the use of dead trees by wildlife should not become a criterion to define a woodland. We also do not support that features characterized by dead trees automatically be considered a potential Enhancement Area to the NHS. This could only be determined through future area-specific or site-specific studies.</p> <p>11. Are there any additional considerations or trends that Halton Region should review in terms of the Natural Heritage component of the ROP?</p> <p>Based on review of the five Technical Memos, additional comments are provided in Attachment A for consideration when preparing draft ROP policy and mapping revisions. They include comments on the draft 2019 RNHS mapping and a number of technical comments on natural heritage, natural hazards and water resource systems discussed in the Technical Memos.</p> <p>Rural and Agricultural System Discussion Questions</p> <p>1. Mapping options</p> <ol style="list-style-type: none"> Should the updated ROP designate prime agricultural areas with a separate and unique land use designation? Are there any additional pros and cons that could be identified for any of the options? Do you have a preferred mapping option? If so, why? <p>No comment.</p> <p>2. Agriculture-related uses</p> <ol style="list-style-type: none"> Should the ROP permit the agriculture-related uses as outlined in the Guideline on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety? What additional conditions or restrictions should be required for any agriculture-related uses? Should some uses only be permitted in the Rural Area as opposed to Prime Agricultural Lands? <p>No comment.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>3. On-farm diversified uses</p> <ul style="list-style-type: none"> a. Should the ROP permit on-farm diversified uses as outlined in the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas in its entirety? b. What additional conditions or restrictions should be required for any on-farm diversified uses? c. The Guideline on Permitted Uses in Ontario’s Prime Agricultural Areas limit on-farm diversified uses to no more than 2 percent of the farm property on which the uses are located to a maximum of 1 ha. As well, the gross floor area of buildings used for on-farm diversified uses is limited (e.g. 20 percent of the 2 percent). Are these the appropriate size limitation for Halton farms? <p>No comment.</p> <p>4. To what extent should the updated ROP permit cemeteries in:</p> <ul style="list-style-type: none"> a. Urban Areas b. Rural Areas c. Prime Agricultural Areas <p>Explain the criteria e.g. factors that are important to you, that should be considered when evaluating cemetery applications for each?</p> <p>No comment.</p> <p>5. Do the AIA policy requirements in the ROP sufficiently protect agricultural operations in the Prime Agricultural Area and Rural Area? If not, what additional requirements do you think are needed?</p> <p>The discussion paper highlights a number of areas where either an AIA is required or where policies require that potential impact on agricultural operations be assessed and mitigated. Even in policies that do not necessarily require an AIA, the ROP acknowledges the use of an AIA to avoid, minimize, or mitigate impacts to the agriculture. These policies ensure that agricultural operations are significantly protected. It could be clarified that assessing and mitigating may require an AIA to inform that assessment.</p> <p>For development in Settlement Areas, the assessment should be done when the lands are being considered for inclusion in the Settlement Area. Further policies at the Secondary Plan stage should discuss options for mitigation but further assessment and AIAs should not be required once the lands are within a Settlement Area boundary.</p> <p>6. Should the requirements for an AIA be included in any other new or existing ROP policies?</p> <p>See comments above.</p> <p>7. Should special needs housing be permitted outside of urban areas and under what conditions?</p> <p>No comment.</p> <p>8. Are there any additional considerations or trends that Halton Region should review in terms of the Rural and Agricultural System component of the ROP?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>In order to create compact communities and achieve transit supportive densities, consideration should be given to permit a broader range of land intensive, compatible uses in the rural area including the Greenbelt Plan Area. These uses would include cemeteries, places of worship, stormwater management ponds and large scale community wide parks.</p> <p>Regional Urban Structure Discussion Questions</p> <p>Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe The Regional Urban Structure Discussion Paper was released in June 2020. Due to the date of release, it does not reflect Amendment 1 to the Growth Plan which was approved on August 28, 2020. Changes to the Growth Plan in Amendment 1 are fundamental to a discussion on growth management and the Regional Urban Structure. Amendment 1 includes extending the Plan horizon year to 2051 from 2041; requiring municipalities to use the updated forecasts in Schedule 3 or higher forecasts as determined through a municipal comprehensive review (MCR); using a new market-based Land Needs Assessment Methodology for the Greater Golden Horseshoe; changes to the planning for Major Transit Station Areas within a Provincially Significant Employment Zone; alignment with the Provincial Policy Statement 2020 (PPS 2020) and modifications to the Growth Plan transition regulation.</p> <p>We also note that the Discussion Paper does not appear to reflect the Provincial Policy Statement (PPS) 2020 which came in effect on May 1, 2020. Changes to the PPS include “accommodating an appropriate affordable and market-based range and mix of residential types”; and the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning.</p> <p>The Regional Urban Structure Discussion Paper should either be updated or an Addendum Report produced to review the impact of these fundamental changes in Provincial policy and their implications with respect to the matters considered in this paper.</p> <p>1. How can the Regional Official Plan further support the development of Urban Growth Centres?</p> <p>No comment.</p> <p>2. Should the Region consider the use of Inclusionary Zoning in Protected Major Transit Station Areas to facilitate the provision of affordable housing?</p> <p>The Planning Act allows municipalities to require inclusionary zoning in Major Transit Station Areas and requires a certain proportion of housing as affordable housing. Providing for affordable housing is a laudable policy objective, but that objective needs to be balanced with the market realities present in the local context. More established high density residential markets can easier absorb the costs of affordable housing requirements. The Agerton Secondary Plan area is a greenfield area that has not yet established a presence in the urban residential market. Although the future GO Station will provide an incentive for higher density housing, it will take some time for the market to get established. It is important that the financial viability of higher density development in the early stages of the Secondary Plan’s development is not impacted by affordable housing requirements.</p> <p>3. Should the Region consider the use of the Protected Major Transit Station Areas tool under the Planning Act, to protect the Major Transit Station Areas policies in the Regional Official Plan and local official plans from appeal? If so, should all Major Transit Station Areas be considered or only those Major Transit Station Areas on Priority Transit Corridors?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The tool of a Protected Major Transit Station Area is useful in an established urban area where intensification of higher density development may raise objections but not every MTSA will require that approach. In a greenfield setting such as the Agerton Secondary Plan, concerns typical of an established urban area are not present and will not be an impediment to development. As such, the Protected Major Transit Station Area tool is not required in such situations. The ROP should therefore differentiate established urban areas verses greenfield areas in the use of this tool.</p> <p>4. From the draft boundaries identified in Appendix B and the Major Transit Station Area boundary delineation methodology outlined, do you have any comments on the proposed boundaries? Is there anything else that should be considered when delineating the Major Transit Station Areas?</p> <p>The Trafalgar Go MTSA which is situated within the Agerton Secondary Plan area is proposed to extend from Derry Road north to the rail line and from Trafalgar Road west to the Greenbelt Plan boundary. This boundary appears to be generally appropriate, however, Step 3 of the delineation methodology suggests that the boundary is to be refined to exclude established uses such as parks and educational institutions. Although such established uses do not exist, the endorsed Secondary Plan calls for a District Park and an elementary school and a place of worship) in the proposed MTSA boundary. The Town and Region should work together to determine if these proposed land uses should be removed from the MTSA for purposes of delineation and minimum density requirements.</p> <p>5. How important are Major Transit Station Areas as a component of Halton’s Regional Urban Structure? What is your vision for these important transportation nodes?</p> <p>Major Transit Station Areas should be a key component of Halton’s Regional Urban Structure. MTSAs should be a focus for higher density mixed use development, providing for a concentration of apartment units, supportive retail and service commercial uses as well providing for office employment in line with market expectations.</p> <p>6. Building on the 2041 Preliminary Recommended Network from the Determining Major Transit Requirement, should corridors be identified as Strategic Growth Areas in the Regional Official Plan? Is so, should a specific minimum density target be assigned to them?</p> <p>As indicated in Figure 19, Regional roads in the Secondary Plan - Trafalgar Road, Derry Road and Britannia Road all shown as HOV lanes and TSP (Transit Signal Priority) lanes. These corridors or parts of these corridors could be identified as Strategic Growth Areas as the Trafalgar Corridor Secondary Plan identifies Nodes at the intersection of these roads and in additional locations along Trafalgar Road. However, the policies should not require high density development along the full extent of a corridor without understanding the local context and the market forces at play in that context. Applying a one size fits all minimum density along all of the road corridors in Figure 19 could impact the ability of other Strategic Growth Areas – Urban Growth Centres, MTSAs and other key intensification areas to attract high density development and achieve their planned function. The ROP should encourage transit supportive development along identified transit priority corridors but then defer to local municipalities to carry out secondary plan studies to implement the policy direction. In the case of the Trafalgar Corridor, the Region can rely on the soon to be approved Trafalgar Corridor Secondary Plan for the delineation of the boundaries of the Strategic Growth Areas and the permitted land uses and densities within them.</p> <p>7. Should the Regional Official Plan identify additional multi-purpose and minor arterial roads in the Regional Urban Structure, not for the purposes of directing growth, but to support a higher order Regional transit network?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Identifying additional minor arterial and collector roads as part of the Regional Transit network can't be done in isolation from the identification of the appropriate location and form of transit supportive land uses. These roads and accompanying land uses should be identified and addressed by local municipalities through their secondary plans rather than in the Regional Official Plan. The Regional Official Plan can provide direction to local municipalities to identify collector roads that could serve as potential high-frequency transit functions and set out policies which speak to the form of urban growth along those corridors.</p> <p>8. Are there any other nodes in Halton that should be identified within the Regional Official Plan from a growth or mobility perspective (i.e. on Map 1)? If so, what should the function of these nodes be, and should a density target or unit yield be assigned in the Regional Official Plan?</p> <p>From a Regional perspective, any additional nodes that should be identified will be local nodes. Similar to the responses to questions 6 and 7, the identification of additional development nodes, their function and their density should be undertaken at the local level through a detailed understanding of the local context. The identification of an urban node in new greenfield areas is best understood through Secondary Plans at the local level which could identify local nodes for mixed use and higher density developments as has been done in the Trafalgar Secondary Plan.</p> <p>9. Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?</p> <p>The four general Principles and the associated assessment considerations provide an appropriate framework for considering employment conversions. Under the Principle of Demonstrated Need, and the consideration of Strategic Opportunity, the report discusses the ability to support "Local Urban Structure" and highlights a number of strategic growth management objectives. The ROP should be clear that the role of Local Urban Structure and the policies on accommodating significant population and employment growth could be established through secondary plans such as the Agerton Secondary Plan. The Agerton Secondary Plan establishes a Major Transit Station – Mixed Use Area designation that extends beyond the proposed boundary of the MTSA and facilitates intensification not only near the proposed Trafalgar GO Station but also along the Transit Priority corridors along Trafalgar Road and Derry Road.</p> <p>10. Are there any areas within Halton Region that should be considered as a candidate for addition to an Employment Area in the Regional Official Plan?</p> <p>No comment.</p> <p>11. How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p> <p>Significant changes are occurring in the commercial and office sectors of the economy as well as in distribution. These changes have been accelerated by COVID, and will likely continue after the pandemic is over. We cannot crystal ball what the end effect of those changes will be. As such, it is important for the Region to provide flexibility in the location of employment uses and not be prescriptive so that planning at the local level can easily adapt in the future while considering the local context.</p> <p>12. What type of direction should the Regional Official Plan provide regarding planning for uses that are ancillary to or supportive of the primary employment uses in employment areas? Is there</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>a need to provide different policy direction or approaches in different Employment Areas, based on the existing or planned employment context?</p> <p>No comment.</p> <p>13. How can the Regional Official Plan support planning for employment on lands outside Employment Areas, and in particular, within Strategic Growth Areas and on lands that have been converted? What policies tools or approaches can assist with ensuring employment growth and economic activity continues to occur and be planned for within these areas?</p> <p>The type of land use planned within Strategic Growth Areas is typically a matter addressed at the local level and should be considered as part of preparation of Secondary Plans.</p> <p>The Region should identify the general locations of the Strategic Growth Areas and provide flexible policies to encourage a mix of land uses within the Strategic Growth Areas, and the local municipalities should provide for detailed planning within specific boundaries. A prescriptive one size fits all policy across the Region is not appropriate.</p> <p>14. Are there other factors, besides those required by the Growth Plan, Regional Official Plan or Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential settlement area expansions?</p> <p>No comment.</p> <p>15. What factors are important for the Region to consider in setting a minimum Designated Greenfield Area (DGA) density target for Halton Region as whole, and for each of the Local Municipalities? Should the Region use a higher minimum Designated Greenfield Area density target than the 50 residents and jobs per hectare target in the Growth Plan?</p> <p>The Provincial Policy Statement and Growth Plan now require a full range and mix of housing types that meets market needs. To achieve an intensification target of 50%, a significant proportion of multi-unit housing, i.e., townhouses and apartments, will need to be directed to the intensification areas. As a result, lower density housing products of necessity will need to be directed to DGA in order to provide a housing mix that meets market needs. Therefore, 50 residents and jobs per hectare in the DGA is an appropriate density target.</p> <p>16. Are there any additional considerations or trends that Halton Region should review in terms of the Regional Urban Structure component of the Regional Official Plan Review?</p> <p>No comment.</p> <p>Climate Change Discussion Questions</p> <p>1. Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?</p> <p>No comment.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>2. How do you think the Regional Official Plan can help Halton respond to climate change? What mitigation and adaptation actions would you like to see embedded in the ROP?</p> <p>It would be valuable for the ROP to consider the practical realities and limitations of development as any targets and requirements are being set. Additional collaboration, instruction or resources may be needed to ensure new targets and requirements are met under the ROP (e.g., are more resilient materials or procuring the services necessary to meet ROP targets feasible within Halton at this time). This has been an issue other municipality have had to confront once climate change policies have been released.</p> <p>Any policies need to have flexibility to allow for innovation and changing technologies. The Region should consider options for incentives to encourage innovation in mitigation and adaptation.</p> <p>3. Should more be done through Regional Official Plan policies to specifically tie growth management to climate change? If so, what should be done?</p> <p>We recommend that the Region consider not only reduction of greenhouse gas emissions as it relates to growth management, but also supporting climate adaptation (or the reduction of climate impacts and risks on and to development). Reducing climate risks and impacts on developments, buildings and designated growth areas benefits all stakeholders.</p> <p>Climate change should also be viewed as an overall community goal, where implementation needs to occur within public and private spaces. Schools, parks, NHS and other public lands have potential to have a significant impact on overall climate change goals and should be encouraged to be part of the solution including mitigation and education aspects.</p> <p>However, there is not one magic bullet to reduce climate risks but rather a suite of different measures that could be taken depending on the context of the local municipality. Therefore, a flexible policy approach is necessary so that the appropriate suite of measures can be applied in each circumstance. This flexible approach is best undertaken by lower-tier municipalities to implement programs and initiatives on a case by case basis to support climate change adaptation.</p> <p>Applying a “climate lens” tends to be a theoretical exercise that does not engage the development community until later in the process. It would be valuable to engage with the development industry earlier to ensure that the results of this process are not only scientifically credible, but that they can be applied in the industry.</p> <p>4. What do you think the Region should do to help you reduce your GHG emissions? For example, if you typically commute by car to work or school every day, what would make you consider taking transit, biking, walking?</p> <p>Land use arrangement and streetscape design can have a significant impact on commuting patterns. Providing destinations to walk to, making it comfortable to walk along the roads, providing higher densities to support transit along transit corridors. It is about creating a well planned, complete community that provides residents to opportunity to live, work and play in their community thereby reducing commuting. Most of the planning for land use arrangements and streetscape design can and should be done at the local level through secondary plans.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>However, the Region still has a role to plan in the design of Regional Roads. The wider the road and the faster the traffic the more it will be less conducive to pedestrians and cyclists. The Regional roads need to be humanized.</p> <p>5. Do you think the Region should encourage and support local renewable energy sources? If so, what should be considered?</p> <p>As indicated previously, the Region should consider options for incentives to encourage innovation in renewable energy. It should then be implemented in the local context as some areas are going to have different abilities to make use of renewable energy sources.</p> <p>6. Can you provide examples of opportunities to address climate change as it relates to agriculture that you would like to see in Halton?</p> <p>No comment.</p> <p>7. According to the PPS, 2020, planning authorities are required to consider the potential impacts of climate change in increasing risks associated with natural hazards (e.g. fires and floods). How can ROP policies be enhanced to address climate change impacts on natural hazards?</p> <p>The re-delineation of natural heritage areas or zones considering future climate resilience is incredibly complex from a scientific perspective. There is a lack of thresholds and high uncertainty relating to the extent that a certain buffer around an already protected area helps achieve a lesser climate impact. We recommend caution be taken when establishing any such requirement or target without close consultation among all stakeholders in the Region. Instead of establishing a one-size-fits-all approach, we recommend that a clear, cost-effective “climate resilience related” methodology or “menu” is created that can be consistent in logic but applied on a case-by-case basis as development proceeds.</p> <p>8. Are there additional measures the ROP should include to improve air quality?</p> <p>No comment.</p> <p>Thank you for the opportunity to comment on the Discussion Papers. Please ensure this letter is included in the package of comments to Regional Council</p> <p>Yours very truly, SGL PLANNING & DESIGN INC. Paul Lowes, MES, MCIP, RPP Principal</p> <p>ATTACHMENT A Region of Halton Official Plan Review Natural Heritage Discussion Paper and Supporting Technical Documents Agerton New Urban Ltd. October 30, 2020</p> <p>ATTACHMENT A Region Official Plan Review Natural Heritage Discussion Paper and Supporting Technical Documents</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Agerton New Urban Ltd.</p> <p>October 30, 2020</p> <p>Through the Region Official Plan Review (ROPR), the Region is updating their Official Plan to be consistent with the Provincial Policy Statement (PPS), 2020, and to conform to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019), the Greenbelt Plan (2017) and the Niagara Escarpment Plan (NEP) (2017). In July 2020, the Region of Halton released a number of Discussion Papers as part of their ROPR consultation process. On behalf of Agerton New Urban Ltd., Savanta Inc., R. J. Burnside & Associates Limited and Stonybrook Consulting Inc. reviewed the following information, along with portions of the above noted provincial plans:</p> <ul style="list-style-type: none"> • Natural Heritage Discussion Paper, July 2020; • Policy Audit Technical Memo, Review of the Regional Official Plan Natural Heritage System Policies + Mapping, April 9, 2019, Amended May 2020; • Mapping Audit Technical Memo, Review of the Regional Official Plan Natural Heritage System Policies + Mapping, November 2018, Amended May 2020; • Background Review Technical Memo, Review of the Regional Official Plan Natural Heritage System Policies + Mapping, November 2018, Amended May 2020; • Best Practices Review Technical Memo, Review of Regional Official Plan Natural Heritage Systems Policies + Mapping, May 2020; and • Quality Assurance/Quality Control (QA/QC) process of the draft 2019 Regional Natural Heritage System (RNHS), March 27, 2020, <p>Input to responses to questions posed by the Region in the Natural Heritage Discussion Paper (NHDP) are included in the SGL letter. This Attachment A offers additional comments on the Draft 2019 RNHS mapping and natural heritage and water resources matters outlined in the Technical Memos.</p> <p>The Technical Memos contain a substantial amount of discussion on a wide variety of topics including the PPS, Growth Plan and Greenbelt Plan reviews, requirements to bring the ROP into conformity with these provincial plans, similarities and differences in plan policies and definitions relating to natural heritage, natural hazards and water resources system, background review of other documents relevant to the ROPR, experience with implementation of ROPA 38 policies, requirements / suggestions for new policies, alternative approaches to mapping revisions and new mapping requirements. It is apparent from this work that the ROP conformity exercise is a detailed, challenging task. The following comments are based on information circulated to date, however, continuing discussion and input to the Region throughout the next phase of the ROPR will be important to better understand and comment more specifically on how conformity matters are addressed in the revised ROP.</p> <p><u>A. Draft 2019 RNHS Mapping</u></p> <p>As described in the NHDP,</p> <p>“Maps 1 and 1G of the ROP have been refined as part of this ROPR to better reflect the policies that define the NHS and to recognize some minor inconsistencies in the extent of the RNHS between Maps 1 and 1G. The draft 2019 RNHS also utilized updated base data information available from the Province and conservation authorities to assemble the RNHS. Using updated base layers ensures that NHS mapping in the ROP reflects the most current data available and thus the maps are as accurate as possible. In addition to the base layers updates, a review of the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>NHS mapping was undertaken to recognize planning decisions and updated information since ROPA 38 and this includes OMB decisions, approved planning applications, special Council Permits and staff refinements based on in-field observations.”</p> <p>The NHDP includes the Region’s draft 2019 RNHS mapping. Subsequent to the release of the NHDP, the Region provided an interactive digital mapping tool that provides mapping of the draft 2019 RNHS at a more detailed scale to facilitate its review at more area-specific or site-specific levels. In addition to the NHDP, several of the Technical Memos noted above addressed RNHS mapping matters.</p> <p>The Agerton landowners and their consulting team have reviewed the draft 2019 RNHS mapping within and adjacent to the Agerton Secondary Plan area. We offer the following comments for your consideration when updating the RNHS mapping:</p> <p>a) Baseline Data for RNHS Updates - The Region has advised that the 2019 RNHS mapping released to date includes planning decisions, OMB decisions, and changes from other sources up to June 2018. Further, they note that the draft 2019 NHS mapping will continue to evolve through this process based on availability of new data, policy changes and consultation with local municipalities, Halton’s Advisory Committees, agencies and the public. We concur that updates should continue to be made up to ROP approval to include additional data to make the revised OP mapping as current as possible at its approval date. In this regard, see comment f) below, where additional changes to the 2019 RNHS mapping are requested by the Agerton Landowners Group based on recommendations from the Milton Urban Expansion Area Subwatershed Study.</p> <p>b) Revisions to Digital Mapping – Based on review of the interactive digital mapping materials provided on the Region’s website, a number of questions were discussed with Regional staff at the September 28, 2020 BILD meeting. At that time, mapping layer labels and the approach to mapping shown in Settlement Areas was discussed. We wish to confirm our understanding that changes will be made to mapping layer labels including:</p> <ul style="list-style-type: none"> • The RNHS layer within Settlement Areas called ‘Proposed Draft NHS Key Features’ should read, ‘Proposed Draft NHS’ • The ROPA 38 layer called ‘ROPA 38 NHS – Enhancement Areas’ should read, ‘ROPA 38 NHS – Buffers, Linkages and Enhancement Areas’ • The layer called ‘Draft NHS Linear Key Features - Rivers’ should read, ‘Proposed Draft NHS – Watercourses’. <p>c) Mapping of Buffers, Linkages and Enhancement Areas – Section 4.5 of the ROPR Natural Heritage Discussion Paper indicates that “an analysis was completed to refine the components of the NHS including Buffers, Enhancement Areas and Linkages” and that “Enhancement Areas and Linkages were evaluated to ensure they were still valid after the updates, identify new enhancement and linkages opportunity and that those identified were consistent with the approach taken for the existing, in-force, RNHS”. Based on the Draft 2019 RNHS mapping, these layers are not presented in Settlement Areas. Please advise if/how this was done for the Agerton lands. If completed for these lands, we request a digital version for review as soon as possible.</p> <p>d) Use of Proxy Data for RNHS Mapping – What proxy data was used to identify Significant Valleylands and Significant Wildlife Habitat? Each of these Key Features requires a substantial amount of site specific information to determine whether they are present. Please advise if/how this was done for the Agerton lands.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>e) No Growth Plan NHS in Settlement Areas – The NHDP and technical memos include discussions on the Growth Plan NHS noting that it does not extend into Settlement Areas. However, we note that Figure 7 in the NHDP shows parts of the Growth Plan NHS within Agerton Secondary Plan Area north of Derry Road, west of Trafalgar Road. This area is a designated Settlement Area and therefore, the Growth Plan NHS should not be mapped here.</p> <p>We understand that the Region is working with the Province to correct these mapping issues and that all future RNHS mapping will exclude the Growth Plan NHS from within designated Settlement Areas in the Region.</p> <p>f) Owner Requested Changes to the 2019 RNHS - The Quality Assurance/Quality Control (QA/QC) Process of the Draft 2019 Regional Natural Heritage System (RNHS) Memorandum (March 27, 2020) indicates that the Draft 2019 RNHS has considered “OMB or LPAT decisions, approved planning applications, approved subwatershed studies, special council permits and staff refinements based on in-field observations and digital base data sources from the Province and local conservation authorities”. The Memorandum also indicates that “June 2018 was used as a benchmark to recognize these refinements (i.e., a Planning Act application or subwatershed study had to be approved by that date).</p> <p>As per ROP Section 116.1, “The boundaries of the Regional Natural Heritage System may be refined, with additions, deletions and/or boundary adjustments, through:</p> <ul style="list-style-type: none"> a) a Sub-watershed Study accepted by the Region and undertaken in the context of an Area-Specific Plan; b) an individual Environmental Impact Assessment accepted by the Region, as required by this Plan; or c) similar studies based on terms of reference accepted by the Region. <p>Once approved through an approval process under the Planning Act, these refinements are in effect on the date of such approval. The Region will maintain mapping showing such refinements and incorporate them as part of the Region’s statutory review of its Official Plan.”</p> <p>As you are aware, the Town of Milton prepared the Milton Urban Expansion Area Subwatershed Study addressing a range of environmental and engineering matters associated with the development of the Britannia West, Trafalgar Corridor and Agerton Secondary Plan areas. Initiated in 2014, this study included five years of study involving fieldwork, analyses, and consultation culminating to date in the draft Final Subwatershed Study reporting in May 2020. A substantial amount of fieldwork, analyses, time, consultation and funds were involved in the preparation of this SWS. A large component of the SWS addressed RNHS issues including the identification of Key Features, recommendations for further study of buffers, linkages and enhancement areas, and management strategies for the protection, restoration and management of the RNHS. On the basis of SWS analyses, a number of refinements were recommended to the RNHS.</p> <p>The Landowners request that RNHS refinements recommended to the Milton Urban Expansion Area Subwatershed Study (SWS; Phase 4: Implementation and Monitoring Plan) be recognized and incorporated into the final RNHS mapping. While we acknowledge the SWS is not “approved” and is currently in Draft Final form, it is substantially complete. Further, the NHS presented in the SWS is based on a substantial amount of field data collected between 2015 and 2017 (with data collected from 2018 to current to be incorporated in future</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>planning stages) and therefore, is a significantly more accurate representation of Key Features and other RNHS components than the existing ROPA 38 mapping. There was an extensive amount of review, discussion and revisions made through the SWS process to address stakeholder inputs.</p> <p>There is one small area within the Agerton area where the SWS provides data to support its removal from the RNHS. See attached Figure 1. Based on current SWS data, it is appropriate to make this refinement to the RNHS mapping now. If further revisions are made in the Final SWS, we will provide them for inclusion in the RNHS prior to new Official Plan adoption.</p> <p>Agerton New Urban Ltd. also suggest that the Region consider changes to policy 116.1 to acknowledge and formalize RNHS refinements once SWS, MESP or equivalent studies are completed. This will provide clarity regarding approved RNHS refinements in a more timely fashion and reduce uncertainty through the development process.</p> <p><u>B. Water Resource System</u></p> <p>The NHDP notes that the Provincial Policy Statement (PPS) 2020, the Growth Plan (2019) and the Greenbelt Plan (2017) all include policies related to the identification of water resource systems. In particular,</p> <ul style="list-style-type: none"> • The PPS, Section 2.2.1(d), states that “planning authorities shall protect, improve or restore the quality and quantity of water by ... identifying water resource systems consisting of ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas, which are necessary for the ecological and hydrological integrity of the watershed”. • The Growth Plan requires, “... the identification of water resource systems and the protection of key hydrologic features and key hydrologic areas, similar to the level of protection provided in the Greenbelt. This provides a consistent framework for water protection across the GGH, and builds on existing plans and policies, including the Lake Simcoe Protection Plan and source protection plans developed under the Clean Water Act, 2006. Recognizing that watersheds are the most important scale for protecting the quality and quantity of water, municipalities are required to undertake watershed planning to inform the protection of water resource systems and decisions related to planning for growth.” • The Growth Plan also states that, “Water resource systems will be identified to provide for the longterm protection of key hydrologic features, key hydrologic areas, and their functions”. <p>The Growth Plan defines the water resource system to be “A system consisting of ground water features and areas and surface water features (including shoreline areas), and hydrologic functions, which provide the water resources necessary to sustain healthy aquatic and terrestrial ecosystems and human water consumption. The water resource system will comprise key hydrologic features and key hydrologic areas”. [underlining added]. Definitions of various terms in the above definition provide further direction to components of the water resource system (WRS) that include:</p> <p>Key hydrologic features:</p> <ul style="list-style-type: none"> • Permanent and intermittent streams • Inland lakes and their littoral zones 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Seepage areas and springs • Wetlands <p>Key hydrologic areas:</p> <ul style="list-style-type: none"> • Significant groundwater recharge areas • Highly vulnerable aquifers • Significant surface water contribution areas <p>As mapping information for the Water Resource System (WRS) does not currently exist, a review of available mapping information and strategies to advance WRS mapping was completed by the Region's consultants and presented in the Region's Mapping Audit Technical Memo. The Memo includes discussion on the context for WRS mapping, the methodology applied as part of their review, the key findings from the mapping information audit, and considerations to advance the Region's WRS mapping. Based on our review of this Memo, in consultation with SGL and review of the PPS and Growth Plan, we offer the following comments for consideration during the next phase of the ROPR related to the WRS:</p> <p>a) The ROPR will address requirements for the identification of the WRS that was not part of ROPA 38. Careful interpretation of PPS and Growth Plan policy and definitions are needed particularly related to the various WRS defined terms. We note the Growth Plan WRS definition provides further guidance to the PPS policy addressing WRS, and that WRS policies outside of Settlement Areas implicitly vary from those applicable to Settlement Areas. Differences in policy direction related to the WRS within and outside of Settlement Areas must be clear in the revised ROP.</p> <p>b) The Mapping Audit Technical Memo discusses the WRS definition and lists components of the WRS. It includes the key hydrologic features and key hydrologic areas that are included in the WRS definition noted above in the Growth Plan but adds further items that go beyond the definitions of key hydrologic features and key hydrologic areas in the Growth Plan. In particular, watercourses, rivers, vegetation protection zones, discharge areas, aquifers and unsaturated zones are interpreted to be part of the WRS definition. We suggest that these added items be reviewed and removed based on the following:</p> <ul style="list-style-type: none"> ▪ Watercourse and Rivers – These terms are not used in the WRS definition in the Growth Plan. We suggest that only the defined terms be used - that is permanent and intermittent streams - so that there is no confusion or expectation that watercourses and rivers are in addition to permanent and intermittent streams. ▪ Vegetation Protection Zones – We cannot find where the WRS definitions include vegetation protection zones. Please clarify the basis for the inclusion of 30m VPZs in the WRS. ▪ Discharge areas – These areas are not part of key hydrologic features or key hydrologic areas. They are addressed by the inclusion of seepage areas and springs as well as permanent and intermittent stream definitions. Therefore, to prevent confusion the term "discharge areas" should not be used. ▪ Aquifers and unsaturated zones – While these are listed in the 'ground water features' definition, they are not key hydrologic features or key hydrologic areas that make up the WRS. Aquifers and unsaturated zones are essentially everywhere in all watersheds and therefore cannot all meet the definition of ground water features, 'which are necessary for the ecological and hydrological integrity of the watershed'. The WRS definition captures the intended aquifers in the key hydrologic areas definition (i.e., highly vulnerable aquifers). This appears to be recognized in the review of available mapping. We suggest that that aquifers and unsaturated zones be removed from the WRS definition in the Technical Memo to prevent confusion. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>c) Floodplains - The Growth Plan definition does not include floodplains but does include permanent and intermittent watercourses. Floodplains are natural hazards that are addressed in other PPS policy. We agree with the authors of the Background Review Technical Memos, that floodplains are not part of the WRS. Therefore, it is not clear why, through consultation with the Region, local municipalities and conservation authorities, it was concluded that floodplains could be included in the WRS mapping. What is the rationale for this when natural hazards (flooding and erosion) are addressed separately in the PPS, and WRS and natural hazards management policies differ?</p> <p>d) Headwaters – The PPS and the Growth Plan refer to ‘headwaters’ as part of the ‘surface water features’ and the Growth Plan includes ‘headwater catchments’ as part of the definition of ‘significant surface water contribution areas’. Discussion in the Mapping Audit Technical Memo appears to equate headwaters and headwater catchments to Headwater Drainage Features. We do not believe that this is the intent of these provincial documents. In geography, headwaters are source areas of a stream, usually referring to the uppermost portions of watersheds. The term headwater drainage features (HDF) is a relatively new term applied to small local drainage features throughout a watershed. The PPS used the term ‘headwaters’ well before the term HDF was established. We believe that the provincial documents intended the broad commonly used definition of headwaters, not HDFs. We request that this term be reviewed and its application modified during the next phase of the ROPR.</p> <p>e) Significant surface water contribution areas - These areas are part of the 'key hydrologic area' definition. Based on the reference to baseflow in the definition, it is not clear how this differs from significant groundwater recharge areas. Clarification is required.</p> <p>f) Section 5.0 of the Mapping Audit Technical Memo discusses the approach to mapping the WRS. Overall, the lack of sufficient high quality data at the regional scale makes the relevance of producing a water resource systems map questionable at the Regional scale. The Growth Plan does not require such mapping as it is clear that from the Growth Plan (Section 4.2.1.3) that watershed planning or equivalent will inform the identification of water resource systems, or in the case of large-scale development of designated greenfield areas a subwatershed plan or equivalent (Section 4.2.1.4).</p> <p>g) Section 2.0 of the Mapping Audit Technical Memo discusses scale and accuracy concerns with producing regional NHS maps. It is noted that the mapping may provide a false sense of precision, and due to the age, consistency and completeness of input data, that the mapping may not accurately reflect current conditions. These same concerns relate to the production of a WRS map. For these reasons, which reinforce the comment in subsection f) above, consideration should be given to not mapping the WRS at the regional scale. If any components of the WRS are mapped, the purpose and limitations of such mapping must be made very clear. For any mapping,</p> <ul style="list-style-type: none"> ▪ we echo the Technical Memo comments that ‘the characteristics and limitations of the mapping need to be understood to enable appropriate interpretation’, ▪ it is important that the ROP include policies which acknowledge and facilitate changes to WRS mapping. Based on our experience with the broad scale nature of such regional mapping, it is not accurate without the benefit of area-specific and/or site specific studies. As an example, significant groundwater recharge areas have been mapped as part of regional Source Protection Plans (SPP). If these layers are used, it is important to recognize such maps are high level and generally based on the extent of permeable sediments as mapped on provincial surficial geology maps. While SPP mapping is noted in the Audit Mapping Technical Memo to be Class 1 data (current, digital and current practices used), the mapping is often inaccurate at the site-specific level. Not 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>unexpectedly, area-specific and/or site-specific studies based on fieldwork, often generate very different mapping outcomes. Based on this experience, the expectation of possible substantive changes to the WRS based on detailed studies should be clear.</p> <ul style="list-style-type: none"> ▪ a qualifier should be included on all maps to indicate that the mapping is based on the best available sources at a given date and has been prepared for illustrative purposes only to guide future study. The maps should also note that they contain data from multiple sources that may have been obtained at a variety of scales and dates that may be of limited accuracy. Care must be taken in trying to use such mapping for land use planning purposes. ▪ Mapping of headwater drainage features at the regional level would require a level of detail that is not available. These very local drainage features should not be mapped at the regional scale which reinforces the fact that they should not be considered as part of the WRS as noted above. ▪ Springs and seepage areas should be addressed in policy only, requiring that these areas be identified through area-specific and/or site-specific studies. <p>h) As outlined in the Mapping Audit Technical Memo, the Region proposes to map the WRS separate from the NHS and contain separate policies for these two systems. It acknowledges functional relationships between the NHS and WRS and that policies applicable to the two systems will be different. We concur that WRS policies should be addressed separately from the NHS policies with cross-referencing where appropriate. Separation of these systems will clarify/reinforce differing policies that apply to key hydrologic areas. Related policies must acknowledge that changes to the WRS (additions or deletions that may be substantial in some areas) could occur based on further study which would not require an amendment to the ROP.</p> <p><u>C. Suggested Policy Revisions Relating to Infrastructure</u></p> <p>The Policy Audit Technical Memo includes discussion on ROP Sections 118(2)a and 118(2)b that deal with alterations to Key Features and other components of the RNHS, suggesting that there is not a clear exemption permitting infrastructure in the RNHS that excludes the no negative impact test. The NHDP includes possible approaches to provide clarification that would exclude the no negative impact test. Changes to policy that would provide this clarification would be beneficial.</p> <p>Conflicting discussion in the NHDP suggests that the Region may explore the requirement to demonstrate “No Overall Negative Impact”, for “essential public works” only, providing all options are first considered through an appropriately comprehensive EA (i.e. more than a Schedule A or A+ EA) or similar environmental study process and all feasible avoidance and mitigation are identified for implementation. No definition of “No Overall Negative Impact” and “essential public works” is provided.</p> <p>Policy changes that introduce more constraints to infrastructure planning and design are not supported. Current practices and policy require substantive study of infrastructure consistent with Class EA requirements that effectively address appropriate avoidance, design and mitigation requirements.</p> <p><u>D. SWM Facilities Permissions in the RNHS</u></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The Best Practices Technical Memo suggests that consideration be given to permissions to locate SWM facilities in linkages and enhancement areas.</p> <p>The Agerton Landowners Group support permissions for SWM facilities and low impact development (LID) measures in portions of the RNHS within buffers, linkages and/or enhancement areas based on completion of appropriate studies that demonstrate facilities can be located and designed to protect Key Features and functions. Further, uses such as trails, channel realignments and grading should also be permitted in linkage and enhancement areas.</p> <p><u>E. Critical Function Zones</u></p> <p>The concept of critical function zones (CFZ) is discussed in the Best Practices Review Technical Memo. Specifically, Section 2.7 (Buffer Width Determination and Buffer Width Refinement Framework) indicates, "It should be noted that in some cases more detailed studies may recommend a buffer width greater than the minimum 30 m buffer width defined in order to protect natural heritage features (e.g., Provincially Significant Wetlands or significant wildlife habitat) and critical function zones."</p> <p>The CFZ concept is not discussed in any of the other Technical Memos, nor the Natural Heritage Discussion Paper. Therefore, it is not clear why any reference is made to critical function zones. They are not supported by any existing policy or relevant guidance for land use planning and are not referenced in provincial plans or technical guidance prepared to support the application of the PPS. It is largely under-researched with respect to application in an urbanizing area and has not been widely applied in urban planning applications in the GTA. It introduces a substantial degree of uncertainty in NHS planning with respect to the requirement to balance environmental protection or enhancement with other community objectives set out in the Growth Plan. As such, the Owners do not agree with the statement in Section 2.7 of the Best Practices Review Technical Memo or the applicability of critical function zones in Settlement Areas.</p> <p><u>F. Enhancements to Key Features</u></p> <p>Section 115.3 of the ROP indicates that "enhancements to Key Features" are a component of the RNHS. Enhancements to Key Features are defined in the ROP as follows:</p> <p style="padding-left: 40px;">"ecologically supporting areas adjacent to Key Features and/or measures internal to the Key Features that increase the ecological resilience and function of individual Key Features or groups of Key Features."</p> <p>While the ROP provides this definition, it does not provide any further guidance on the identification or delineation of "Enhancement Areas". In our experience, practitioners often refer back to the 2009 Natural Heritage System Definition & Implementation report prepared as part of the Sustainable Halton report series for this additional guidance, however, there have been very different interpretations made. As well, the ROP (Map 1G) maps Enhancement Areas in the same layer as linkages and buffers and therefore, it is not possible to distinguish in mapping where Enhancement Areas have been identified in the ROP.</p> <p>Consideration should be given to providing further direction to the identification of enhancements to Key Features as we understand that the current ROP mapping layer is not intended to infer that buffers, linkages and enhancement areas are each located everywhere shown. The 2009 Report supports that interpretation. Enhancements to Key Features should be assessed during area-specific and/or site-specific studies.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>G. Buffers and Vegetation Protection Zones</p> <p>The Policy Audit Technical Memo discusses buffers and vegetation protection zones. It specifically suggests that:</p> <ul style="list-style-type: none"> ▪ the current definition for VPZs be replaced with the new definition from the Greenbelt Plan and Growth Plan; ▪ the ROP could provide more specific policy guidance on appropriate uses in buffers; and, ▪ consideration should be given to whether adopting the provincial policy approach and terminology regarding VPZs can entirely replace the ROP approach to buffers. <p>The current ROP buffer definition is different from the ROP VPZ definition, and the Greenbelt Plan and Growth Plan have a simplified VPZ definition. We recognize that the VPZ terminology and definitions apply in the legislated provincial documents.</p> <p>We support the current ROP approach that uses both terms buffers and VPZs for differing areas. This provides separate and distinct terms with differing definitions for application in different areas. This should be maintained as the buffer definition is important and appropriate for application in Settlement Areas. This also provides clear direction for buffer determination through future studies based on specific NHS features/sensitivities and adjacent land uses and hence some flexibility in its application appropriate to urban settings.</p> <p>Regarding uses in buffers, infrastructure including SWM facilities, LID measures, channel realignments, grading and trails are supported as permitted uses/activities in buffer uses. Policy revisions should explicitly allow for these uses/activities. Consistent with ROP policies that encourage trails in the RNHS, NHS policies should clearly permit trails in buffers and elsewhere in the RNHS for educational and recreational purposes and public enjoyment.</p> <p>ATTACHMENT B Email Correspondence Re: MNR Policy Interpretation - Significant Woodlands Region of Halton Official Plan Review Agerton New Urban Ltd. October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

Nancy Mather

From: Tom Hilditch <tomhilditch@savanta.ca>
Sent: December 14, 2018 9:07 AM
To: Nancy Mather; Noel Boucher
Cc: Shannon Catton
Subject: Fwd: Aurora District Policy Interpretation - Significant Woodlands

For your information.

Tom

Tom Hilditch
President & CEO

Direct: 1-289-407-0447
Toll Free: 1-800-810-3281 Ext 1010

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Begin forwarded message:

From: Tom Hilditch <tomhilditch@savanta.ca>
Subject: Re: Aurora District Policy Interpretation - Significant Woodlands
Date: December 14, 2018 at 9:05:29 AM EST
To: Emily Funnell <Emily.Funnell@ontario.ca>
Cc: "Allan, Brad (MNR)" <brad.allan@ontario.ca>, "Goodwin, Tracey (MNR)" <Tracey.Goodwin@ontario.ca>

Thank you very much for addressing this so rapidly Emily.

Kindest regards,

Tom


Tom Hilditch
President & CEO

Direct: 1-289-407-0447
Toll Free: 1-800-810-3281 Ext 1010

Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
		<p>SAVANTA INC.</p> <p>www.savanta.ca</p> <p>The information in this email is intended only for the named recipient and may be privileged or confidential. If you are not the intended recipient, please notify us immediately and do not copy, distribute or act based on this email.</p> <p>On Dec 14, 2018, at 9:00 AM, Funnell, Emily (MNR) <Emily.Funnell@ontario.ca> wrote:</p> <p>Good morning Tom</p> <p>Thank you for your email to Brad Allan, and our telephone conversation this morning. I am glad I could clarify for you the application of the Natural Heritage Reference Manual vs the Natural Heritage Assessment Guide for Renewable Energy Projects as they apply to significant woodlands through the municipal land use planning process.</p> <p>Your understanding is correct, the Natural Heritage Reference Manual is the appropriate guidance to use for residential development projects. While the Renewable Energy projects guide may provide guidance that may be easier to interpret, this guide is applicable to renewable energy projects specifically.</p> <p>We will discuss internally to ensure we are providing consistent guidance to our partners and clients. Don't hesitate to contact me with any additional questions.</p> <p>Kind regards</p> <p>Emily</p> <p>EMILY FUNNELL RESOURCES MANAGEMENT SUPERVISOR ONTARIO MINISTRY OF NATURAL RESOURCES & FORESTRY AURORA DISTRICT 500 Wellington Road, Aurora ON L4B 1H1 emily.funnell@ontario.ca M1: (416) 734-1111</p> <p><Image001.png></p> <p>From: Tom Hilditch <tomhilditch@savanta.ca> Sent: Thursday, December 13, 2018 12:49 PM To: Allan, Brad (MNR) <brad.allan@ontario.ca> Subject: Aurora District Policy Interpretation - Significant Woodlands</p> <p style="text-align: center;">2</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Good afternoon Brad, I would like to draw your attention to what I believe is a problematic interpretation of policy in your District. This is based upon a number of recent experiences. I raise this with you in an effort to ensure we have clarity regarding current policy interpretation in your office.</p> <p>Recent MNR Aurora Position: That the Natural Heritage Assessment Guide for Renewable Energy Projects, Second Edition, November 2012 provides more current and clear guidance regarding the definition of significant woodlands, than the NHRM 2010. MNR Aurora has asked that the Renewable Energy Projects Guide be applied to residential development projects - included in this direction is MNR's insistence on 30 m buffers to significant woodlands, outside of the Greenbelt Plan.</p> <p>Your staff have indicated that this 2012 resource should be used to define significant woodlands for projects other than non-renewable energy projects (e.g., residential projects).</p> <p>My understanding from your Ministry's Policy Division (Peterborough) is that the Natural Heritage Assessment Guide for Renewable Energy Projects, Second Edition, November 2012, is only applicable to Renewable Energy Projects. It does not replace or supersede the 2010 NHRM.</p> <p>I would appreciate you confirming that this provincial position matches your District's implementation of policy. I am happy to discuss this in more detail should that be helpful to you.</p> <p>Best regards,</p> <p>Tom</p> <p>Tom Hilditch President & CEO</p> <p>Direct: 1-289-407-0447 Toll Free: 1-800-810-3281 Ext 1010</p> <p>SAVANTA INC.</p> <p>www.savanta.ca</p> <p>The information in this email is intended only for the named recipient and may be privileged or confidential. If you are not the intended recipient, please notify us immediately and do not copy, distribute or act based on this email.</p> <p>ATTACHMENT C Recommended Changes to Draft 2019 RNHS Mapping Region of Halton Official Plan Review Agerton New Urban Ltd. October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>PROPOSED RINIS CHANGES</p> <ul style="list-style-type: none"> SW Map T2-2 in the Draft Final Phase 4 SWS identifies this area as a "Potential RINIS Refinement Area." The RCOPA 38 RINIS mapping identified a small Key Feature in this area and included a buffer around it. SW Map T3-3 shows no Key Features in this location, as it is located predominantly within the fenced-in area associated with the barn, with a portion in a cultural meadow outside the fenced area. The area shown and associated buffer should be deleted from the RINIS. <p>Milton Phase 4 Growth Area - Agerton Secondary Plan Area</p> <ul style="list-style-type: none"> Agerton Corridor Secondary Plan Area Participating Ownership Proposed RINIS Delineation Greenbelt Plan RINIS Existing RINIS (SDPA 3.8) Key Features Enhancement Areas, Linkages and Buffers <p>Figure 1 Proposed RINIS Refinements - Agerton Secondary Plan Area</p> <p>All photos: iStock Solutions 2020. Imagery taken in 2019.</p> <p>SAVANTA A GEBCO Company</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
		<p>Addendum letter attached per email dated 2020-11-17</p> <p>Re: Regional Official Plan Review Discussion Papers Agerton New Urban Ltd. Landowner Group Comments Addendum Letter</p> <p>In reference to the original submission of comments submitted on behalf of the Agerton New Urban Ltd. Landowner Group on Halton Region's Official Plan Review Discussion Papers dated October 30th 2020, the individual landowner names were not included. For the information of Council and for the Region's records, attached are the landowners that comprise of the Agerton New Urban Ltd. Landowner Group:</p> <ul style="list-style-type: none"> • A. Capobianco & Sons Limited • 662072 Ontario Limited • York Trafalgar Properties Inc. • Derry Centralia Inc. • 2689229 Ontario Inc. • C.B. Land Management Inc. <p>Yours very truly,</p>	

No.	Source	Submission	Response
		<p>SGL PLANNING & DESIGN INC.</p> <p>Paul Lowes, MES, MCIP, RPP Principal</p>	
26.	Arbor Memorial Inc	<p>Email dated 2020-10-30</p> <p>Good afternoon Rick,</p> <p>Pursuant to the discussion during our last virtual meeting, please find attached our submission which includes draft Cemetery Policies (Updated) for review and consideration and a Memo regarding our discussion on cremation rates and its impact on cemetery space requirements. Thank you for the opportunity to submit this information. Please contact us should you have any questions or comments concerning this matter.</p> <p>Regards, Michael</p> <p>■ LARKIN+ LUPi¹ ■ Michael T. LARKIN M.PI., MCIP, RPP</p> <p>Email dated 2021-03-24</p> <p>Hi Elizabeth</p> <p>We are still reviewing the future of these lands at a corporate level with our client. We have no further information to submit at this time but should this change, we will get back in touch.</p> <p>Regards, Michele</p> <p>■ LARKIN+ LUPi¹ ■ Michele I. FREETHY MA, RPP</p>	<p>This Policy Directions Report sets out broad policy approaches to address issues that have been considered in the Regional Official Plan Review to date and indicate how they can be reflected in policy development in future Amendments to the Regional Official Plan. The policy directions set out in the Report are based on the research and analysis and public engagement program that has been undertaken thus far. The Policy Directions Report describes key areas where changes to the Regional Official Plan are proposed.</p> <p>Natural Heritage</p> <p>Regional staff continues to support the RNHS policy framework and believes it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application.</p> <p>Regional staff notes the following in regards to Agerton New Urban Ltd. Landowner Group's responses to the Discussion Questions from the Natural Heritage Discussion Paper presented in Appendix D of your submission:</p> <p>The policy directions for Natural Heritage (i.e., NH1 to NH-11) were informed by feedback received from groups including the public, stakeholders, and agencies. Policy directions to address comments received include, but are not limited, to the following:</p> <ul style="list-style-type: none"> • a harmonized approach for the Provincial NHS mapping and policies; • excluding the NHS for the Growth Plan from settlement area boundaries in Halton; • maintaining the goals and objectives for the RNHS; • providing guidelines for clarification on how linkages, enhancements, and buffers are established; • address woodland quality in the determination of significant woodlands. • incorporating new policies and mapping to implement a Water Resource System; • updating policies to conform to the three Source Protection Plans that apply to Halton Region; • introducing a new section on Natural Hazards in the ROP to introduce policies that are consistent with the Provincial Policies and Plans and direct Local Municipalities to include policies and mapping in their Official Plans;

No.	Source	Submission	Response
			<p>More fulsome details are available in the Policy Directions Report. Please note that any refinements to the Regional Natural Heritage System must be completed in accordance with Policy 116.1 through a Subwatershed Study or Environmental Impact Assessment accepted by the Region through an approval process under the Planning Act. South Milton Urban Expansion Area Subwatershed Study has not been accepted by the Region and is currently under review.</p> <p>Integrated Growth Management Strategy</p> <p>Regional staff note that comments on the IGMS have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through the Preferred Growth Concept Local Municipal Submissions Chart and are beyond the scope of this chart. More details are also available in the IGMS Policy Directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p> <p>Rural and Agricultural System</p> <p>To appropriately plan for cemeteries in Halton, Regional staff developed a specific Policy Direction to further consider and explore this issue. Policy Direction RAS-3 outlines the recommended approach for permitting cemeteries within the proposed Rural Lands designation. Consultation on cemeteries revealed a preference for cemeteries to be directed to settlement areas, but suggestions were also made regarding cemeteries being permitted on rural lands to meet unmet demands, support complete communities, and satisfy other criteria. It was also recommended that details such as cemetery size be determined by local municipalities. Additionally, there was broad support from consultation to restrict cemeteries in prime agricultural areas as these areas are a valuable and finite resource.</p>

No.	Source	Submission	Response
27.	Argo	<p>Attached per email dated 2020-10-30 (Beacon Environmental Limited)</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Discussion Papers (2017 - 2020), Comments on Natural Heritage Discussion Paper</p> <p>Dear Mr. Benson:</p> <p>Beacon Environmental Limited (Beacon), as you are aware, is an environmental consultancy with extensive experience in natural heritage planning. Beacon has provided natural heritage expertise for planning studies on numerous sites within Halton Region, and across southern Ontario, since inception in 2005.</p> <p>Beacon was recently retained by the Argo Development Corporation to complete a review of the Natural Heritage Discussion Paper (Region of Halton 2020a) and related Regional Natural Heritage System (RNHS) mapping released by the Region of Halton as part of the ongoing Regional Official Plan Review (ROPR) process. The following six key issues related to the Region’s preliminary policy directions and options identified through this review are discussed in this letter:</p> <ol style="list-style-type: none"> 1. Need for more emphasis on increasing the quality of natural cover; 2. Need for some flexibility in natural heritage planning in settlement areas; 3. Intent to develop and formalize buffer policies in the settlement areas that are potentially more restrictive than current policies; 4. Lack of clear natural heritage options for settlement areas; 5. Lack of clarity related to Centres for Biodiversity; and 6. Failure to acknowledge locally approved natural heritage system mapping. <p>In cases where mapping issues and/or questions have been identified related to specific properties, these have been described in site-specific letters provided under separate cover.</p> <p>This letter has also been informed by information presented and questions answered at the series of virtual public information centres (PICs) related to the ROPR and climate change (Sept. 3, 2020), Integrated Growth Management (Sept. 10, 2020) and Natural Heritage Systems (NHS) and Agricultural Systems (Sept. 17, 2020). Beacon attended these sessions and made note of relevant directions and responses to questions. No public record of questions and answers provided at any of these meetings has been released to the best of our knowledge, but if there is such a record we would be interested in receiving a copy.</p> <p>ISSUE 1: NEED FOR MORE EMPHASIS ON INCREASING THE QUALITY OF NATURAL COVER</p> <p>It is our understanding that the Region has achieved its objective with respect to NHS cover. Halton’s Strategic Plans from both 2015-2018 and 2019-2022 include objectives for maintaining 50% of the Region in NHS, and the 2020 NH Discussion Paper indicates that the current Regional NHS (including the GB NHS) covers about 50.6% of the Region, while the Draft updated Regional NHS covers about 52.8%.</p> <p>In Beacon’s experience in Halton, and in other southern Ontario municipalities, emphasis on increasing natural cover without due consideration for maintaining or enhancing the quality of that cover can result in the degradation of the protected features and the loss of associated functions. From an ecological</p>	<p>This Policy Directions Report sets out broad policy approaches to address issues that have been considered in the Regional Official Plan Review to date and indicate how they can be reflected in policy development in future Amendments to the Regional Official Plan. The policy directions set out in this Report are based on the research and analysis and public engagement program that have been undertaken thus far. The Policy Directions Report will describe key areas where changes to the Regional Official Plan are proposed.</p> <p>Natural Heritage</p> <p>Regional staff continues to support the RNHS policy framework and believes it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application.</p> <p>Regional staff note the following in regards to your comments to the Discussion to the Natural Heritage Discussion Paper presented in your submission:</p> <p>The policy directions for Natural Heritage (i.e., NH1 to NH-11) were informed by feedback received from groups including the public, stakeholder, and agencies. Policy directions to address comments received include, but are not limited, to the following:</p> <ul style="list-style-type: none"> • a harmonized approach for the Provincial NHS mapping and policies; • excluding the NHS for the Growth Plan from settlement area boundaries in Halton as approved by the Province; • maintaining the goals and objectives for the RNHS; • providing guidelines for clarification on how linkages, enhancements, and buffers are established; • address woodland quality in the determination of significant woodlands. • incorporating new policies and mapping to implement a Water Resource System; • introducing a new section on Natural Hazards in the ROP to introduce policies that are consistent with the Provincial Policies and Plans and direct Local Municipalities to include policies and mapping in their Official Plans. <p>More fulsome details on are available in the Policy Directions Report. Regional staff continues to support the RNHS policy framework and believes it provides flexibility for refining the RNHS through detailed studies at the time of a development or site alteration application. Please note that any refinements to the Regional Natural Heritage System must be completed in accordance with Policy 116.1 through a Subwatershed Study or Environmental Impact Assessment accepted by</p>

No.	Source	Submission	Response
		<p>perspective it is critical to recognize that in a context like southern Ontario many important ecological functions can not be effectively sustained by simply protecting fragmented features. Planning for and investing in ongoing maintenance, monitoring and management of these protected natural areas is required to ensure their functions are sustained for the long term. This is particularly true in urban areas where the access to and the use of natural areas must be actively managed by municipalities and their partners.</p> <p>In the Natural Heritage Discussion Paper (2020), management of natural areas is only mentioned in relation to a potential Natural Heritage Strategy and in relation to the Cootes to Escarpment EcoPark System. <u>As part of the Region’s policy updates it is suggested that some emphasis be placed on the importance of ongoing management and monitoring of protected natural areas within the RNHS, particularly those under public ownership.</u></p> <p>ISSUE 2: NEED FOR SOME FLEXIBILITY IN NATURAL HERITAGE PLANNING IN SETTLEMENT AREAS</p> <p>The Region has indicated through the ROPR process that it has a strong commitment to supporting intensification, compact growth and active transportation while also recognizing the need to address the challenges associated with climate change (e.g., Dillon <i>et al.</i>, 2016, Halton Region 2020a). In September 2019 Regional Council supported a climate Change Emergency Declaration while the local Councils for the City of Burlington, Town of Halton Hills, Town of Milton and Town of Oakville declared climate emergencies earlier in 2019. In addition, Halton’s Strategic Plan 2019-2022 includes an objective of focussing 40% of new development within new intensification areas. Although the Region has not yet finalized its approach to accommodating the required people and jobs, 1.1 million people and 500,000 jobs will need to be accommodated by 2051, with much of this growth expected to be focussed in the Region’s settlement areas¹.</p> <p>Despite this strong commitment to both accommodating intensification in settlement areas and planning with climate change in mind, the Natural Heritage Discussion Paper (Halton Region 2020a), includes little consideration for how the RNHS will be effectively accommodated in the same settlement areas that need to accommodate intensified development, active transportation routes and measures to manage climate change (such as integration of Low Impact Development (LID) features).</p> <p>The Growth Plan NHS and the Greenbelt Plan NHS policies and mapping only apply outside settlement areas. This demonstrates the Province’s recognition of the need for more flexible approaches within the settlement areas that allow communities to accommodate the mandated growth while still protecting natural heritage in a manner consistent with the Provincial Policy Statement in those areas.</p> <p>However, the Natural Heritage Discussion Paper (2020) and the Region’s approach to does not appear to contemplate a different approach for NHS located inside of settlement areas.</p> <ul style="list-style-type: none"> • While the Natural Heritage Discussion Paper (Halton Region 2020a) broadly acknowledges the need to balance the Region’s “precautionary” approach to natural heritage protection “with other Regional objectives where necessary” (p. 23) it only describes one option (i.e., Option 3) where the: “PPS policies on development and site alteration respecting features would apply in settlement areas” (p. 19), and provides no details on how this approach would be implemented. • When asked at the Natural Heritage PIC session (2020-09-17) if there has been consideration for different approaches within the settlement areas, Ms. Lee-Yates indicated that Key Feature and 	<p>the Region through an approval process under the Planning Act. South Milton Urban Expansion Area Subwatershed Study has not been accepted by the Region and is currently under review. For the North Oakville, Derry Green and Boyne Secondary Plan areas, refinements made to the Regional Natural Heritage System that were accepted by the Region through an approval process under the Planning Act will be made through the next version of the draft proposed Natural Heritage System mapping. We have noted the request for review in the submission of the draft proposed Natural Heritage System mapping for the specific properties. Please note that the last date used for planning approvals for the mapping that released with the Natural Heritage Discussion Paper was June 2018.</p> <p>Furthermore, the Natural Heritage Policy Direction NH-7 that an update to the policy be made to incorporate refinements to the Regional Natural Heritage System accepted by the Region through an approval process under the Planning Act occur on a more frequent basis than at the Region’s statutory review of its Official Plan. This will ensure that Halton’s Natural Heritage System mapping reflects the most current data available and thus the maps are as accurate as possible at a regional-scale.</p> <p>The revisions to policies and mapping for Halton’s Natural Heritage Theme will occur through the Stage 3, Phase 3 ROPR and Regional staff will continue to review the suggestions put forward in this submission through that ROPA and continue engagement with the landowner and consultants with regards to comments related to the North Oakville Secondary Plan.</p>

No.	Source	Submission	Response
		<p>NHS component mapping was undertaken using the same methods within and outside of the settlement areas, with the exception of OMB settlements.</p> <ul style="list-style-type: none"> • When asked at the Natural Heritage PIC session (2020-09-17) if the Region would be allowing stormwater management and other green infrastructure in the NHS, Ms. Lee-Yates indicated that the current ROP allows for “essential infrastructure” in the NHS and that there is no intent to expand these permissions; <ul style="list-style-type: none"> ○ Notably – the current ROP does not use or define the term “essential infrastructure”. While the current ROP definition for infrastructure does include storm water systems as long as they are public facilities, “essential” is narrowly defined as “deemed necessary to the public interest ... as determined through an Environmental Assessment process”. <p>In Beacon’s experience, the absence of some flexibility in implementing NHS policies in settlement areas can be problematic because it can make it very difficult or illogical to implement the applicable policies, particularly in redevelopment situations, and inadvertently discourage the use of creative solutions for effectively integrating natural heritage features and functions while also planning for climate change. For example, having portions of publicly owned parks and natural areas able to accommodate temporary/infrequent flooding or allowing buffers to accommodate some types of LIDs.</p> <p>Implementing policies that require public parkland and natural areas to be kept free from measures that support ecological improvements for development within settlement areas does not constitute an efficient use of land. Pushing measures like LIDs onto otherwise developable lands can reduce their effectiveness (e.g., infiltration trenches often work best near wetlands, watercourses) while also reducing the available lands within settlement areas, thereby putting more pressure on municipal Councils to support either higher-density intensification or urban area expansions to accommodate growth. Beacon therefore strongly encourages the Region to <u>consider maintaining and supporting some flexibility in its natural heritage policy direction within settlement areas.</u></p> <p>ISSUE 3: INTENT TO DEVELOP AND FORMALIZE BUFFER POLICIES IN THE SETTLEMENT AREAS THAT ARE POTENTIALLY MORE RESTRICTIVE THAN CURRENT POLICIES</p> <p>There is no provincial policy or technical guidance for requiring prescribed buffers² to key natural or hydrologic features in settlement areas. Buffers are recognized as a tool that can help mitigate impacts to natural areas associated with changes in adjacent land uses (e.g., Natural Heritage Reference Manual 2010), however they are one of a number of tools that can be used. Other important tools to be considered include: targeted restoration within the feature itself, inclusion of site design elements to discourage encroachments into natural areas (such as fencing and / or trails with mown lawn on either side between land uses and natural areas), and ongoing management of access to the natural area along with monitoring.</p> <p>The ROP does not currently include policies that require or prescribe buffers and the current definition of buffers states the “<i>extent of the buffer and activities that may be permitted within it shall be based on the sensitivity and significance of the Key Feature ...</i>” implying a flexible site-specific approach based on science. However, the Natural Heritage Discussion Paper (Halton Region 2020a) clearly indicates that the Region intends to develop more prescriptive buffer policies through the ROPR process with “<i>minimum standards</i>” and formalization of the <i>Framework for Regional Natural Heritage System Buffer Width Refinements for Area-Specific Planning</i> (2017) being suggested.</p> <p>This indicates a shift away from a site-specific and science-based approach to buffer determination and towards a more prescriptive policy-based approach. This shift is of concern in the settlement areas</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>because of: (a) the potential loss of flexibility, which is considered critical in urbanizing areas subject to intensification (as discussed under Issue 2), and (b) the direction to adopt a framework for buffer determination that has several important shortcomings including reliance on a structure and several assumptions that are not scientifically defensible.</p> <p>It is notable that many other upper and single tier municipalities, recognizing the need for some flexibility with respect to implementing NHS policies in settlement areas, do not prescribe 30 m buffers to Key Features like wetlands and significant woodlands in their settlement areas (e.g., City of Hamilton, Region of Peel, City of Guelph, City of London). In addition, the Region of Niagara, which is currently undergoing a ROPR process much like Halton (and with the support of the same technical consultants) has recently confirmed that none of the options being considered include prescribed buffers in the settlement areas, and that the most restrictive of the three options being contemplated includes a requirement for buffers to be applied with widths to be determined through site-specific study (Niagara Region 2020).</p> <p>Beacon therefore strongly encourages the Region to <u>consider maintaining a flexible and site-specific approach to buffer determination in settlement areas. Beacon is also not supportive of formalizing the Region's buffer framework through any ROP policies or guidelines. Should the Region proceed with this direction, they should consider some substantive revisions to the framework to ensure it is rooted in defensible scientific assumptions and provides adequate flexibility in relation to both differing feature sensitivities and site-specific layout and / or design elements that can contribute to RNHS protection in addition to or instead of buffers.</u></p> <p>ISSUE 4: LACK OF CLEAR NATURAL HERITAGE OPTIONS FOR SETTLEMENT AREAS</p> <p>The Natural Heritage Discussion Paper (Halton Region 2020a) presents four options for updating the RNHS in accordance with the new provincial GP NHS requirements and in relation to Prime Agricultural Areas. However, as noted above, these options seem focussed on the lands outside the settlement areas and no clear or distinct option within the settlement areas is contemplated.</p> <p>These options are summarized, as Beacon understands them, in the table below.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission				Response	
		Option	Prime Agricultural (Ag) Areas	Natural Heritage System (NHS) Key Features (KF)	NHS Buffers, Enhancements, Linkages	Key Pro and Con	Comments are acknowledged. Please see above for a detailed response.
1	Designation	KF Overlay	NHS Overlay	PRO: Clear distinction between KF and other NHS components CON: Suggests Ag. areas better protected than NHS			
2	Designation	Designation, but KF within Prime Ag Areas rolled into Prime Ag Areas	NHS Overlay	PRO: Clear distinction of Ag. Areas, KF and other NHS CON: Suggest two tiers of NHS features – “detracts from systems approach”			
3	Designation	Designation	NHS Overlay	PRO: Clear presentation of Ag Areas in relation to known KF and overall NHS connectivity CON: Key Feature policies to be duplicated for within and outside of Prime Ag Areas			
4	Prime Ag. Areas “Constraint”, incl. in broader Ag. Area Designation	KF Constraints within broader NHS Designation	NHS components outside KF designated within Prime Ag Constraint “Overlay”	PRO: Clear presentation of Ag Areas in relation to known KF and overall NHS connectivity CON: Designation of NHS not Prime Ag suggest NHS better protected than Ag			
<p>Based on this understanding, Beacon generally supports Option 2 (which it understands to include mapping and designation of Key Features and watercourses, and mapping of other NHS components as an NHS overlay). However, greater clarity as to how each of these options would be applied in settlement areas is required to provide a more informed opinion.</p> <p>ISSUE 5: LACK OF CLARITY RELATED TO CENTRES FOR BIODIVERSITY</p> <p>Based on the information provided to date, Centres for Biodiversity are expected to be very large (>200 ha) contiguous areas that capture concentrations of significant natural features and where potentially some additional restrictions with respect to permitted uses would apply. It is also assumed that these centres would be primarily or entirely located outside of settlement areas.</p> <p>The Natural Heritage Discussion Paper (2020) and supporting technical memos provide very little clarity or direction with respect to the policies for, and mapping of, these potentially very substantive areas. Instead, the discussion paper states: “<i>Through the ROPR it will be determined how the Centres for Biodiversity will be identified as part of the RNHS mapping and policies</i>”, deferring all details to Phase 3.</p> <p><u>The Region should provide more clarity and specifics about the policies and draft mapping proposed for its Centres for Biodiversity.</u></p> <p>ISSUE 6: FAILURE TO ACKNOWLEDGE LOCALLY APPROVED NHS MAPPING</p> <p>With respect to Draft RNHS mapping presented as part of the Phase 2 ROPR process, the two main areas of concern are that:</p> <ul style="list-style-type: none"> • The Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe (NHSGP) appears to have been mapped within settlement areas in Halton; and 							

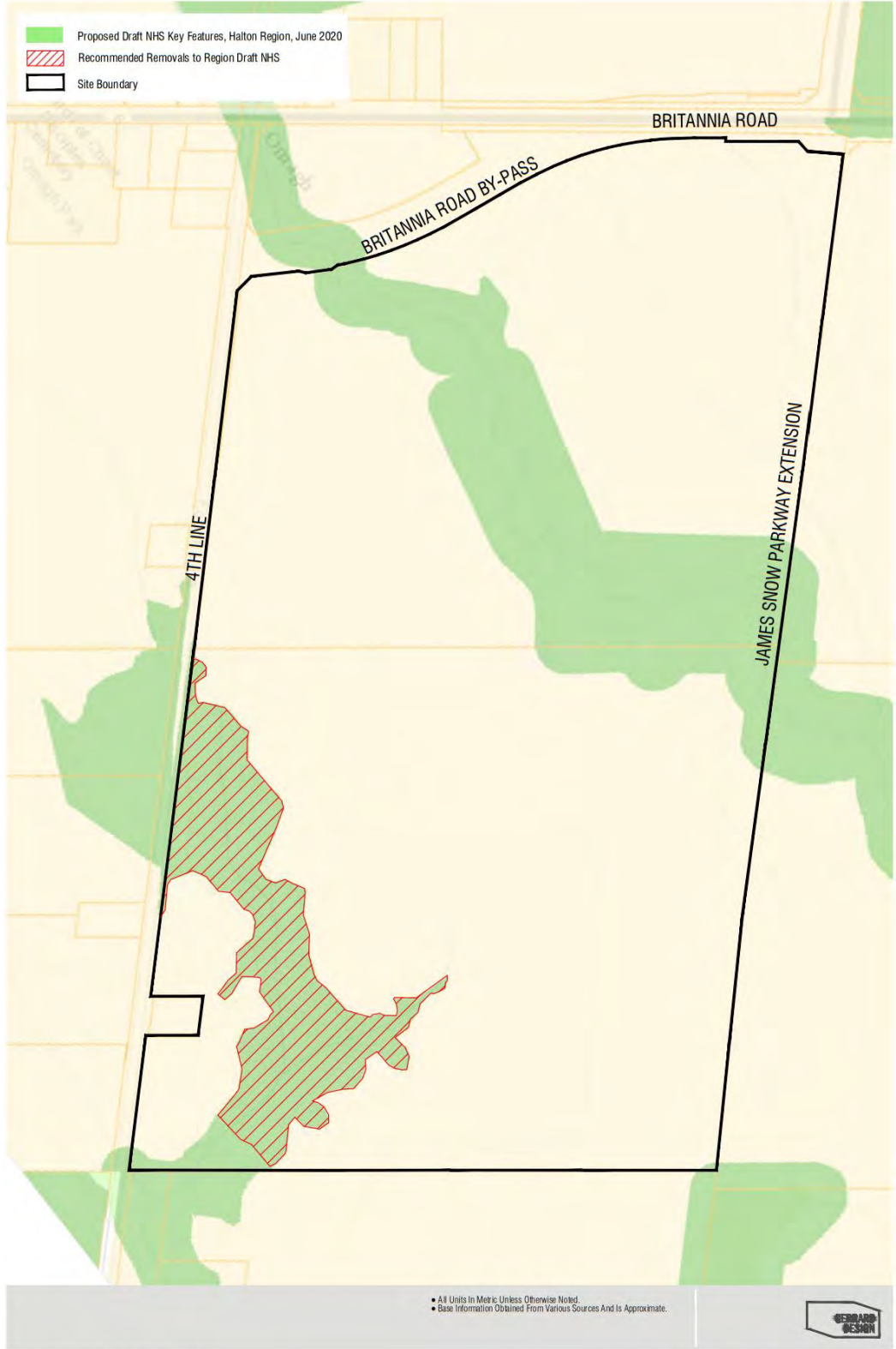
No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Although the Region indicated in the Natural Heritage Discussion Paper (2020) and the supporting technical memos that decisions approved at the OMB or LPAT have been incorporated, this does not appear to be the case on all sites. <p>It is our understanding from both the discussion paper (p. 15) and the PIC held on Sept. 17, 2020 that the mapping of the NHSGP in the settlement areas is recognized as an error that will be corrected going forward. Written confirmation to this effect would be appreciated.</p> <p>It is also understood based on responses to questions at the PIC held Sept. 17, 2020 that the Region intends to carry forward the current ROP policies that respect the LPAT-approved RNHS in North Oakville. Written confirmation of this direction would also be appreciated.</p> <p>Furthermore, it is suggested that it would be both appropriate and consistent to <u>incorporate NHS mapping from approved Subwatershed Studies and Secondary Plans</u> in the settlement areas into the RNHS mapping in the ROP (e.g., Mattamy– Bristol, Sherwood, Boyne, Derry Green, MP4; Burlington – Tremaine Dundas; Halton Hills – Southwest Georgetown) as these are based on site-specific studies and extensive consultative processes undertaken with the local municipality, conservation authority and the Region.</p> <p>SUMMARY OF COMMENTS AND REQUESTS</p> <ol style="list-style-type: none"> 1. Please share a public record of questions and answers provided at the ROPR PICs held on Sept. 3, 10 and 17, 2020 respectively, if such a record has been prepared. 2. As part of the Region’s policy updates it is suggested that: <ol style="list-style-type: none"> a. Some emphasis be placed on the importance of ongoing management of protected natural areas within the RNHS, particularly those under public ownership; b. Careful consideration be given to maintaining and supporting some flexibility in its natural heritage policy direction within settlement areas; c. A flexible and site-specific approach to buffer determination in settlement areas be maintained; d. The Region’s buffer framework not be adopted in ROP policies or guidelines; however should the Region proceed with this direction, some substantive revisions to the framework should be made to ensure it is rooted in defensible scientific assumptions and provides adequate flexibility in relation to both feature sensitivities and site-specific layout and / or design elements that can contribute to RNHS protection in addition to or instead of buffers; and e. Greater clarity as to how the recommended mapping option and approach would be applied in settlement areas. 3. Please provide more clarity and specifics about the proposed policies and draft mapping related to Centres for Biodiversity. 4. Please confirm that the NHSGP mapping will not be applied in the settlement areas. 5. Please confirm that the current ROP policies that respect the OMB-approved RNHS in North Oakville will be carried forward. 6. Please confirm if it would be both appropriate and consistent to incorporate NHS mapping from approved Subwatershed Studies and Secondary Plans across the Region into RNHS mapping for the ROP, similar to the approach used for North Oakville. <p>We thank you for the opportunity to provide comments on the Region’s Natural Heritage Discussion Paper (2020) and draft RNHS mapping through the Phase 2 ROPR process.</p> <p>Please do not hesitate to contact us if clarification or additional information is required.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>We look forward to reviewing the draft ROPR policies and revised mapping put forward through Phase 3 of the ROPR process.</p> <p>Prepared by: Beacon Environmental Margot Ursic, B.A., M.Sc. Principal, Senior Planning Ecologist mursic@beaconenviro.com C: 519.803.8101</p> <p>Reviewed by: Beacon Environmental Ken Ursic, B.Sc., M. Sc. Principal, Senior Ecologist</p> <p>Attached per email dated 2020-10-30 (Aird & Berlis LLP)</p> <p>Re: Submission by Argo Developments - Halton Region Sites Regional Natural Heritage System Policies & Associated Mapping Region of Halton Official Plan Review</p> <p>Our firm is counsel to Argo Development Corporation (“Argo”). Argo owns or has interest in a number of existing and future development sites throughout Halton Region. These sites, among others, are now under consideration by the Region as part of the Regional Official Plan Review (the “ROPR”).</p> <p>As part of the ROPR, the Region is examining the mapping and policies associated with the Regional Natural Heritage System. As indicated in other correspondence filed by Argo and its consultant (Beacon Environmental), Argo wishes to provide both overall and site-specific input to the proposed Regional Natural Heritage System policies and mapping.</p> <p>With respect to general matters arising from a review of the Region’s various Discussion Papers associated with the proposed Regional Natural Heritage System, Argo has commissioned Beacon to provide a general submission on the policy issues raised by some of the Region’s current proposals related to the Regional Natural Heritage System.</p> <p>With respect to site-specific matters arising from a review of the Region’s mapping, Argo has further commissioned Beacon to prepare a series of memoranda to provide the Region with more specific information on the manner in which the Regional Natural Heritage System may be appropriately identified on and around Argo’s various sites.</p> <p>We are pleased to provide Beacon’s memos to you as part of this submission. Please find attached Beacon’s general policy memo, along with individual memos for the following sites:</p> <ul style="list-style-type: none"> • Orianna Glen Homes Corp - 5553 Fourth Line, Milton • Bronte Green Corp - 1401 Bronte Road, Oakville • Argo Developments / Newmark Developments – 3069 Dundas Street West, Oakville • Argo (Joshua Creek) Developments Limited - PT LT 8, Con 1 Trafalgar, North of Dundas Street, Oakville 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Argo (West Morrison Creek) Limited - PT LT 16, CON 1 Trafalgar, N. of Dundas, PT 1, 20R13395; Oakville/Trafalgar; PIN 249290058 PIN 249290192 • Argo Developments (5th Line) Ltd. (lands in Milton) • Argo Developments (6th Line) Ltd. (lands in Milton) <p>Both our firm and Beacon Environmental are available to discuss any questions Regional Staff may have arising from its review of these memos. We trust the Region will find them to be informative as the ROPR moves forward.</p> <p>Yours truly, AIRD & BERLIS LLP Electronically signed by P.J. Harrington Patrick J. Harrington</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attached Orianna Glen Homes Memo per Aird & Berlis email dated 2020-10-30</p> <p>Re: <i>Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – Argo – Orianna Glen, Milton.</i></p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to a number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>While we understand that the mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to the Region’s attention at this time so that they can either be rectified or addressed prior to completion of the ROPR process.</p> <p>Attached to this memorandum is a map illustrating the subject lands with overlays of the Region’s proposed Draft NHS mapping and recommended changes. Also attached is map T3-1 from the Milton Urban Expansion Area Subwatershed Study – Phase 4 Implementation and Monitoring Plan (Wood 2020), which makes similar recommendations.</p> <p>In comparing the proposed Draft NHS mapping with the known features on the subject lands we note the following:</p> <ol style="list-style-type: none"> 1. The proposed Draft NHS Key Features appears to correspond with wetlands and floodplains. 2. The proposed Draft NHS System Components layer which includes buffers, enhancements and linkages is inactive and blank for the subject lands. 3. The proposed Draft NHS Key Features map layer has included a 30 m precautionary buffer which has been applied to known wetland features as well as other features. <p>Based on our review we offer the following opinions and recommendations:</p> <ol style="list-style-type: none"> 1. The proposed Draft NHS Key Features mapping should be revised to correspond with the limits of actual Key Features. Buffers are not Key Features and should therefore be removed from the proposed Draft NHS Key Features mapping layer. 2. The proposed Draft NHS Key Features layer on the southwestern portion of the subject lands corresponds with the floodline and does not support any Key Features. The floodplain mapping for this area was recently updated through the Milton Urban Expansion Area Subwatershed Study (Wood 2020) prepared on behalf of the Town of Milton. We recommend that the revised floodline be used to define the limits of the RNHS. Refer to Attachment B. 3. With respect to the NHS that traverses the northern portion of the property, we understand that the limits of Key Features and their buffers will be confirmed through further study. 4. The ROP does not contain policies related to prescribing buffers or mapping precautionary buffers. In our opinion the mapping of precautionary buffers is unnecessary and serves no purpose as it does not provide feature protection and works against Policy 116.1 which allows for refinements to the boundaries of the NHS through studies such as EIAs which are required to determine the most appropriate measures for protecting key features. Furthermore, it promotes the false narrative that large buffers are the only means for effectively protecting key features. For these reasons we suggest that precautionary buffers be removed from the NHS mapping. <p>Thank you for receiving this submission and we look forward to your responses.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments A – Map overlay of Draft Regional NHS vs. Subject Lands B – Map T3-1 - Milton Urban Expansion Area Subwatershed Study – Phase 4 Implementation and Monitoring Plan (Wood 2020)</p> <p>Attachment A: Proposed Draft Regional Natural Heritage System Mapping Overlaid on Subject Property</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

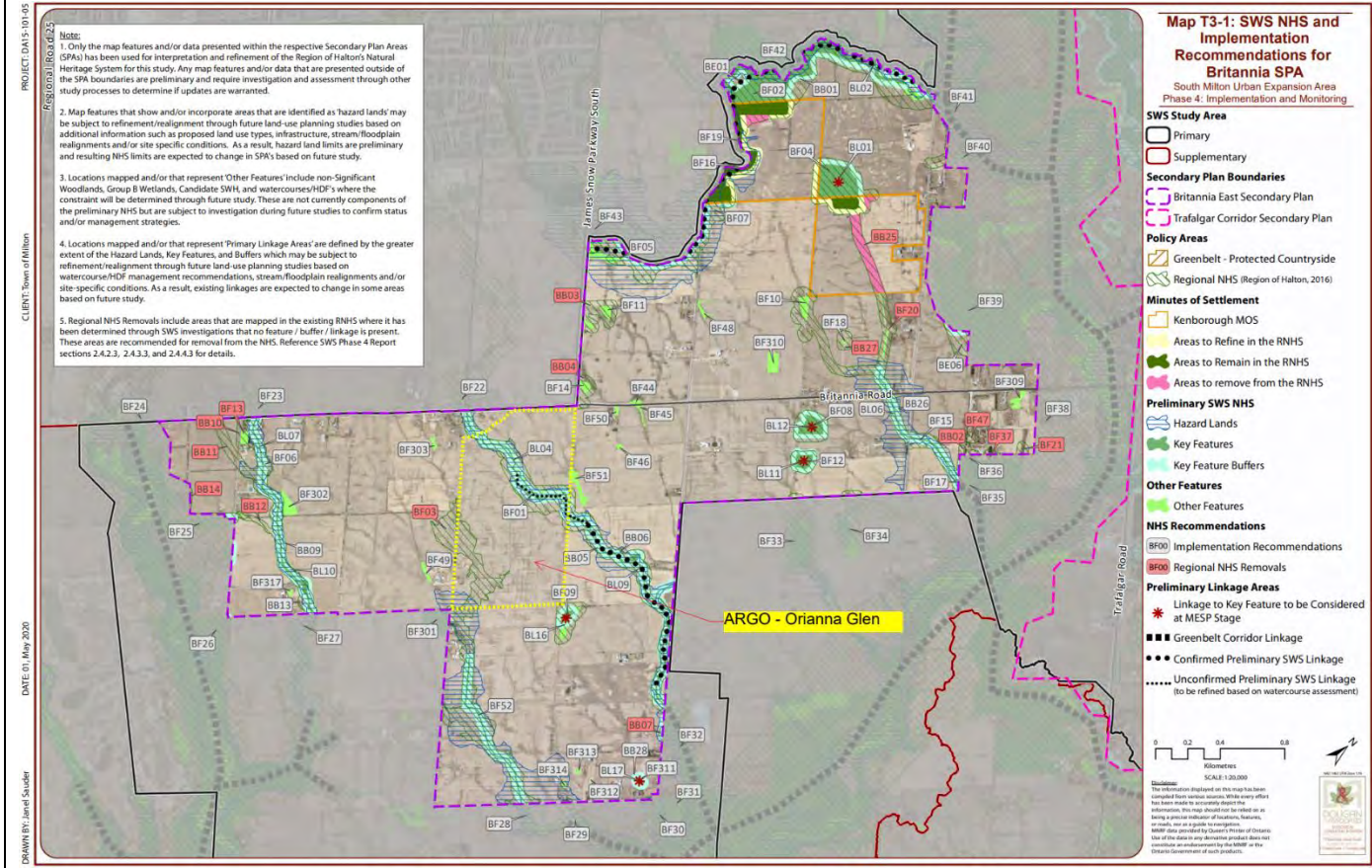
No.	Source	Submission	Response
		 <p>Legend: ■ Proposed Draft NHS Key Features, Halton Region, June 2020 ▨ Recommended Removals to Region Draft NHS □ Site Boundary</p> <p>Map Labels: BRITANNIA ROAD, BRITANNIA ROAD BY-PASS, 4TH LINE, JAMES SNOW PARKWAY EXTENSION</p> <p>Scale: 1:5000 DATE: OCT 30, 2020 PROJECT: 1205</p> <p>Notes: • All Units in Metric Unless Otherwise Noted. • Base Information Obtained From Various Sources And Is Approximate.</p> <p>Logo: GERRARD DESIGN</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

Orianna Glen | Milton, Ontario
HALTON ROPR NHS OVERLAY

No.	Source	Submission	Response
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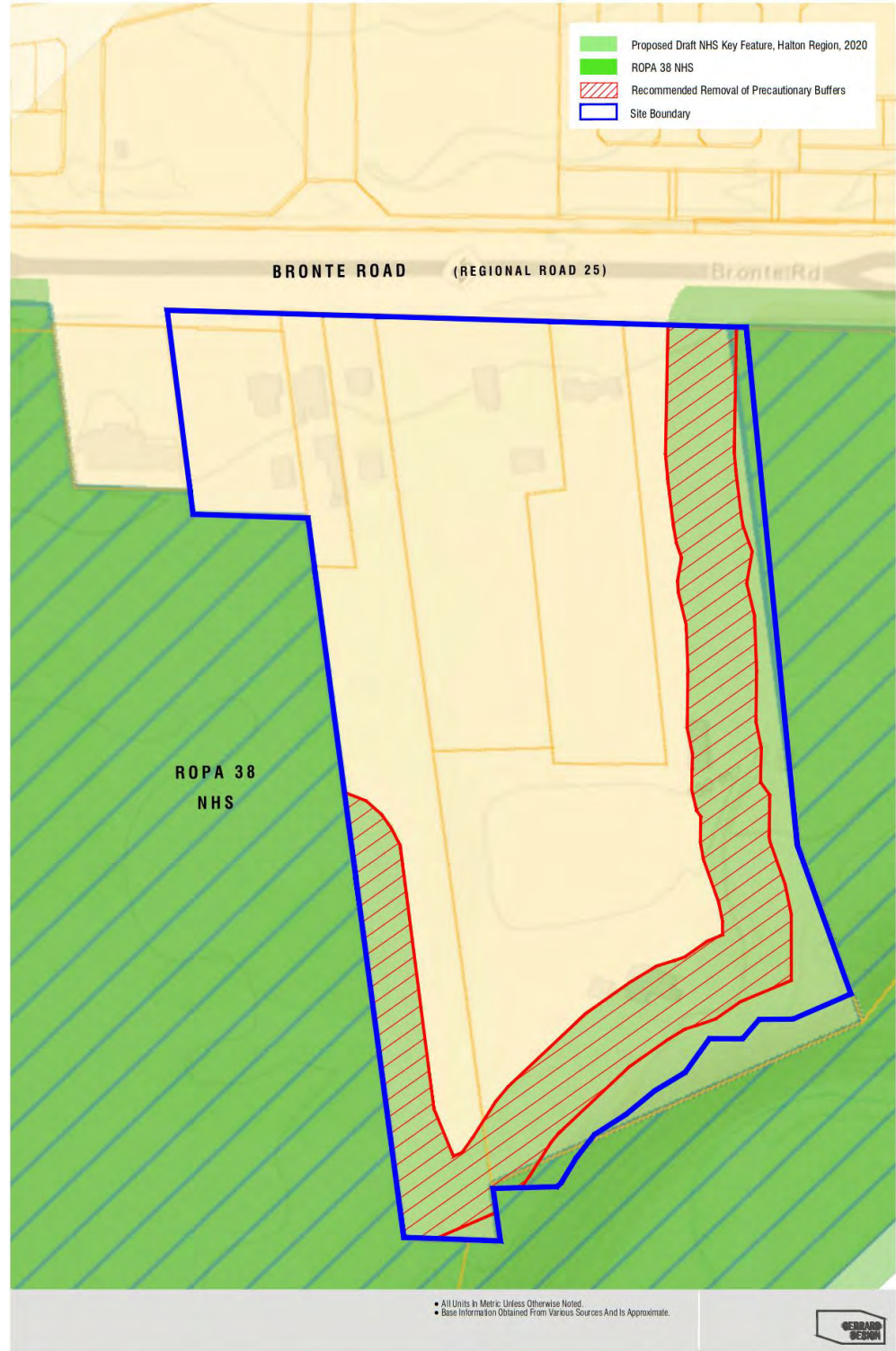
**Attachment B:
Map T3-1 - Milton Urban Expansion Area Subwatershed Study – Phase 4 Implementation and Monitoring Plan (Wood 2020)**

Comments are acknowledged. Please see above for a detailed response.



No.	Source	Submission	Response
		<p>Attached Enns Property Memo per Aird & Berlis email dated 2020-10-30</p> <p>Re: <i>Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – 1300 Bronte Road, Oakville (“Enns Property”)</i></p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>While we understand that the mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to the Region’s attention at this time so that they can either be rectified or addressed prior to completion of the ROPR process.</p> <p>Attached to this memorandum is a map illustrating 1300 Bronte Road, Oakville (the subject lands), also known as the “Enns Property”, with overlays of the Region’s Proposed Draft NHS mapping and ROPA 38 – Key Features mapping.</p> <p>In comparing the new Draft NHS mapping with the existing ROPA 38 mapping we note the following:</p> <ul style="list-style-type: none"> • The current NHS mapping layers corresponding with the existing ROPA 38 Map 1 and Map 1G are identical and are clipped to the boundaries of the Greenbelt and do not extend onto the subject lands. • The proposed Draft NHS “Key Features” mapping layer extends onto the subject lands much further than the staked limits of known key features such as the significant woodland along the southern and western boundary as well as areas along the northern boundary where key features have not yet been confirmed or staked. • The proposed Draft NHS Components layer that corresponds with buffers, enhancements and linkages is inactive and appears to be blank for the subject lands. • It appears that the new Draft NHS Key Features map layer has included a 30 m precautionary buffer which has been applied to staked key features such as significant woodlands along the southern and western property boundaries but also to the non-staked treed areas along the northern property limit which may not qualify as a key feature. <p>Based on our review we offer the following opinions and recommendations:</p> <ol style="list-style-type: none"> 1. The inclusion of 30 m precautionary buffers within the Key Features mapping layer undermines transparency. The concealment of buffers within Key Features mapping was identified as an issue during the ROPA 38 process and appears to have been carried forward to the current ROPR. Buffers are not Key Features and should therefore be removed from the Draft NHS Key Features mapping. 2. The mapping of 30 m precautionary buffers pre-empts the application of Policy 116.1 which allows for refinements to the boundaries of the NHS through studies such as Environmental Impact Assessments (EIAs) required to determine the most appropriate measures for protecting Key Features. Furthermore, this approach implies that buffers are the only tool available to effectively protect Key Features. For these reasons we encourage the Region to consider removing precautionary buffers from its NHS mapping, especially within settlement areas where greater flexibility may be required and alternative measures may be equally effective. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>3. The subject lands are surrounded by the Greenbelt and although the Greenbelt Plan contains policies requiring that a 30 m minimum vegetation protection zone be applied to many Key Features, these policies are not intended to apply within settlement areas.</p> <p>It remains unclear from the Natural Heritage Discussion Paper (2020) and the associated mapping whether the Region intends to apply 30 m precautionary buffers to Key Features in the Urban Areas. Some clarification on this point is requested.</p> <p>Thank you for receiving this submission and we look forward to your responses.</p> <p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments</p> <p>A – Current Draft Regional Natural Heritage System Mapping Overlaid on Current ROPA 38 NHS on Enns Property</p> <p>Attachment A: Current Draft Regional Natural Heritage System Mapping Overlaid on Current ROPA 38 NHS on Enns Property</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>The map displays a site boundary (blue outline) and a Recommended Removal of Precautionary Buffers area (red hatched area) adjacent to a Proposed Draft NHS Key Feature (green area) and ROPA 38 NHS (green area with blue diagonal lines). Bronte Road (Regional Road 25) is visible at the top. A legend in the top right corner identifies the symbols: Proposed Draft NHS Key Feature, Halton Region, 2020 (green square); ROPA 38 NHS (green square); Recommended Removal of Precautionary Buffers (red hatched square); and Site Boundary (blue outline). Text on the map includes 'BRONTE ROAD (REGIONAL ROAD 25)', 'ROPA 38 NHS', and 'BronteRd'. A scale bar and north arrow are at the bottom right.</p> <p>ARGO - Enns Property Oakville, Ontario HALTON ROPR, Proposed Draft NHS Key features and ROPA 38</p> <p>PROJECT 1637 DATE OCT 30, 2020 SCALE 1:1500</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

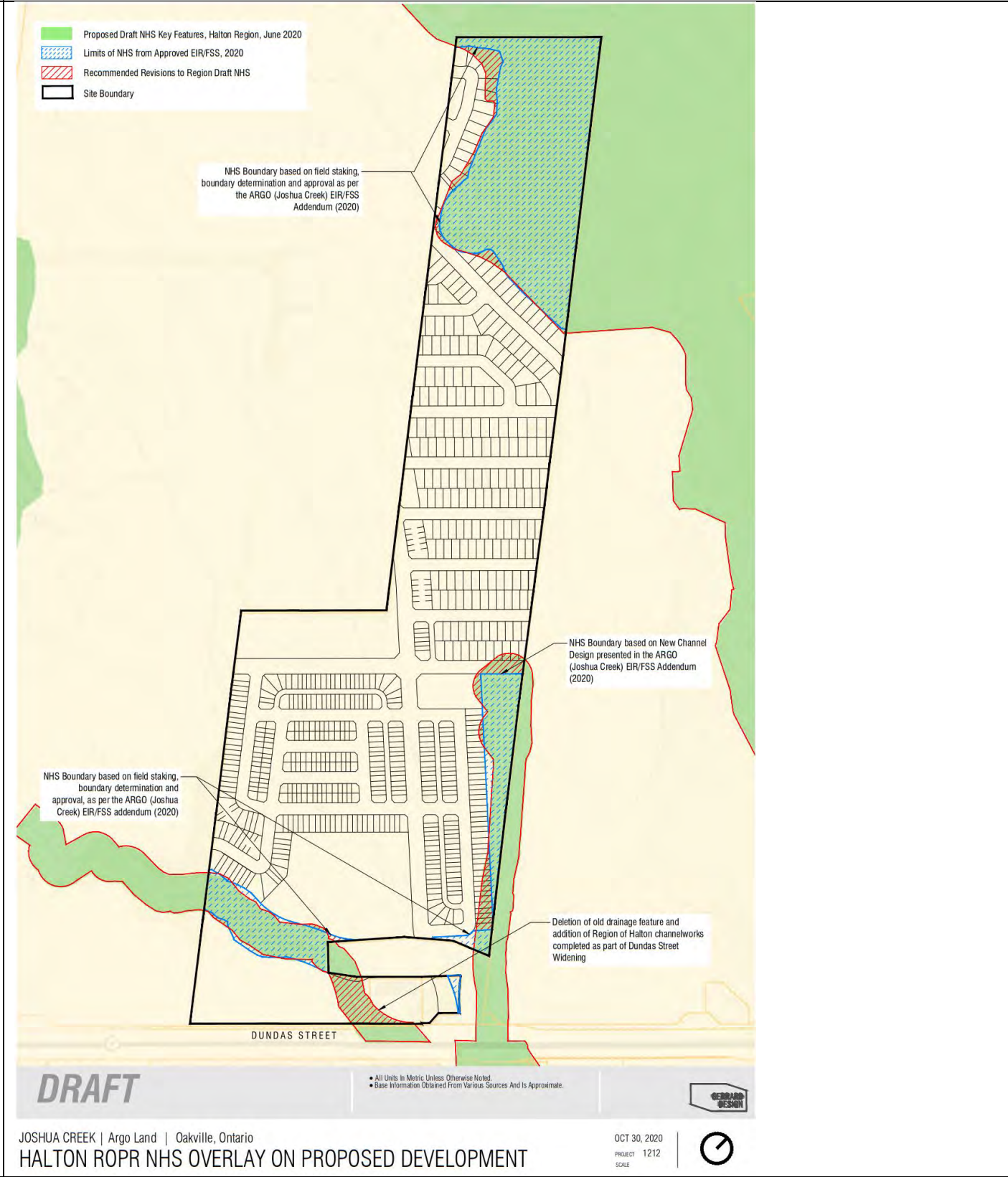
No.	Source	Submission	Response
		<p>Attached Argo Developments / Newmark Developments per Aird & Berlis email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – Newmark/Argo Property, Oakville.</p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>The Newmark/Argo property is located at the Northwest corner of Dundas Street West and Bronte Road in the Town of Oakville. Attached to this memorandum is a map illustrating the location of the subject lands with overlays of the Region’s Proposed Draft NHS mapping and North Oakville West Secondary Plan (OPA 289).</p> <p>As Newmark’s site-specific appeal of ROPA 38 and OPA 289 is still outstanding and allows for the establishment of an alternate NHS to be developed through further studies, it is recommended that Draft NHS mapping for the subject lands be either removed or an overlay placed on the lands noting that the NHS mapping on these lands has no status.</p> <p>Thank you for receiving this submission and we look forward to your responses.</p> <p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments</p> <p>A – Map overlay of Draft Regional NHS on Subject Lands</p> <p>Attachment A: Proposed Draft Regional Natural Heritage System Mapping Overlaid on Subject Property</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>DRAFT</p> <p>ARGO 3069 DUNDAS ST. W. Oakville, Ontario HALTON ROPR NHS OVERLAY</p> <p>• All Units in Metric Unless Otherwise Noted. • Base Information Obtained From Various Sources And Is Approximate.</p> <p>OCT 30, 2020 PROJECT 1923 SCALE 1:4000</p> <p>Legend: Proposed Draft NHS Key Features, Halton Region, June 2020 North Oakville West Secondary Plan NHS Lands under Site Specific Appeal (PL110857) Site Boundary</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attached Argo (Joshua Creek) Developments Limited per Aird & Berlis email dated 2020-10-30</p> <p>Re: <i>Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – Argo Joshua Creek Property, Oakville</i></p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>While we understand that the mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to Region’s attention at this time so that they can either be rectified or addressed prior to completion of the ROPR process. Attached to this memorandum is a map illustrating the subject lands with overlays of the Region’s proposed Draft NHS mapping compared to the Town and agency approved NHS limits from the Argo Joshua Creek Environmental Implementation Report (EIR) Addendum by Stonybrook Consulting 2020.</p> <p>In comparing the proposed Draft NHS mapping with the approved EIR NHS limits, we note a number of locations on the subject lands where the proposed Draft NHS mapping extends beyond the limits of the NHS identified in the North Oakville East Secondary Plan (OPA 272) and also the NHS limits that were recently established and approved by the Region, Town, and CH through the EIR process.</p> <p>These areas are identified with red hatching in the attached map and described below:</p> <ol style="list-style-type: none"> 1. At the north end of the subject lands there are three small areas adjacent to west side of North Oakville NHS Core 11 where the proposed Draft NHS mapping extends beyond the NHS limits that were established with the Town, CH and MNRF through field visits and staking. 2. There are three locations along the north-south channel corridor (JC-31) that flanks the eastern boundary of the subject lands where the proposed Draft NHS mapping extends beyond the NHS limits that have been approved by the Town and CH. It should be noted that the NHS limits are based on a channel corridor design presented in the Argo (Joshua Creek) EIR/FSS Addendum. 3. At the southern end of the property, there is an east west tributary corridor (corresponding with reaches JC-36 and JC-27A). The proposed Draft NHS mapping still identifies the former channel corridor which was replaced by a new corridor when the Region widened Dundas Street approximately seven years ago. The NHS limits along this creek corridor have been staked and approved by the Town and CH through the EIR/FSS. The proposed Draft NHS mapping should be revised to replace the old corridor with the new corridor. <p>It is respectfully requested that the Region adjust their mapping to correspond with the approved NHS limits. Please advise when the Region anticipates these adjustments to be made.</p> <p>Lastly, at the Natural Heritage and Agricultural Systems Public Information Centre held on September 17, 2020 we were informed by Ms. Leilani Lee-Yates, Environmental Planner at the Region, that the Region intends to retain ROP policies 116.2 and 116.3 which pertain to how the RNHS is delineated and implemented in North Oakville. We would kindly ask that you confirm that this will be the Region’s position going forward.</p> <p>Thank you for receiving this submission and we look forward to your responses.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

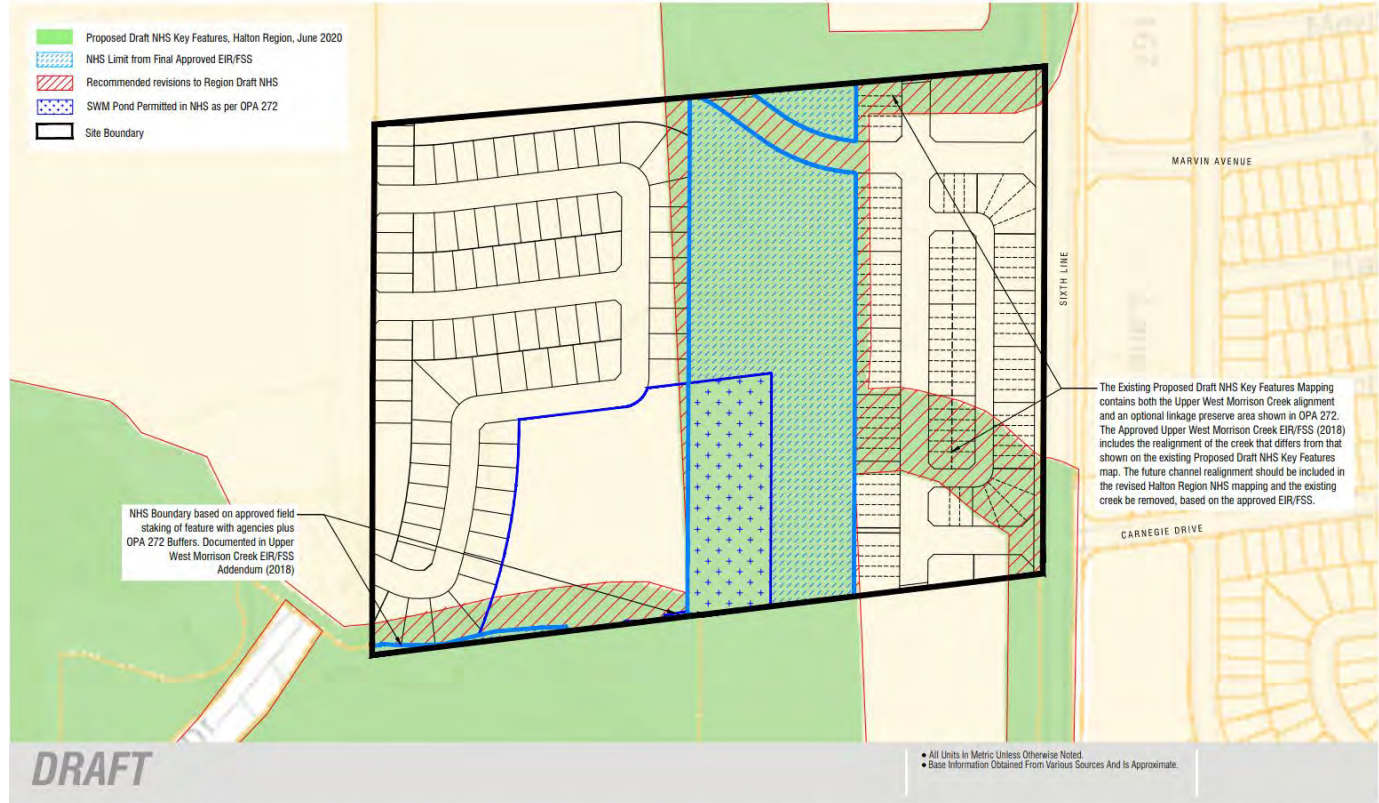
No.	Source	Submission	Response
		<p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments A – Current Draft Regional Natural Heritage System Mapping Overlaid on the EIR-approved NHS boundaries for the Joshua Creek lands</p> <p>Attachment A: Current Draft Regional Natural Heritage System Mapping Overlaid on n the EIR-approved NHS boundaries for the Joshua Creek lands</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
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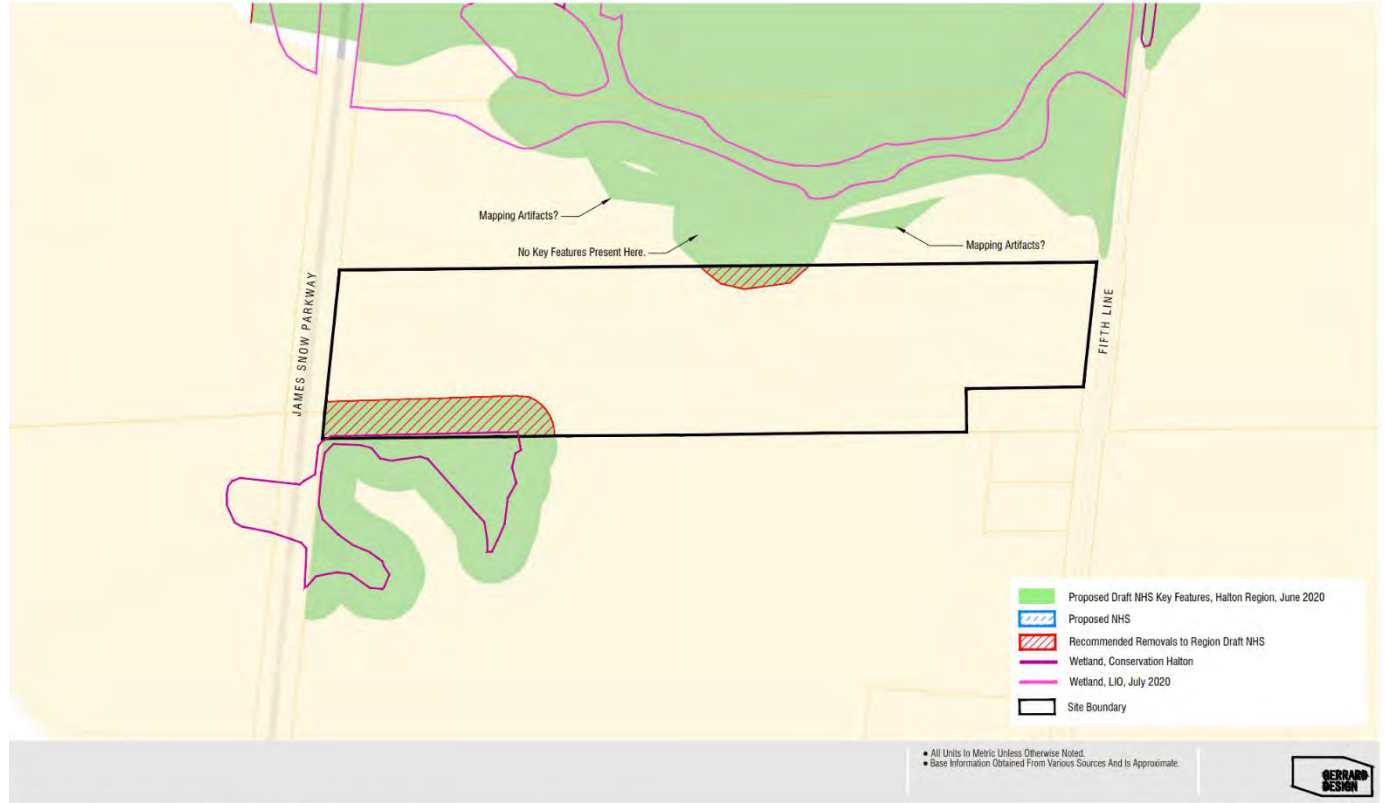


Comments are acknowledged. Please see above for a detailed response.

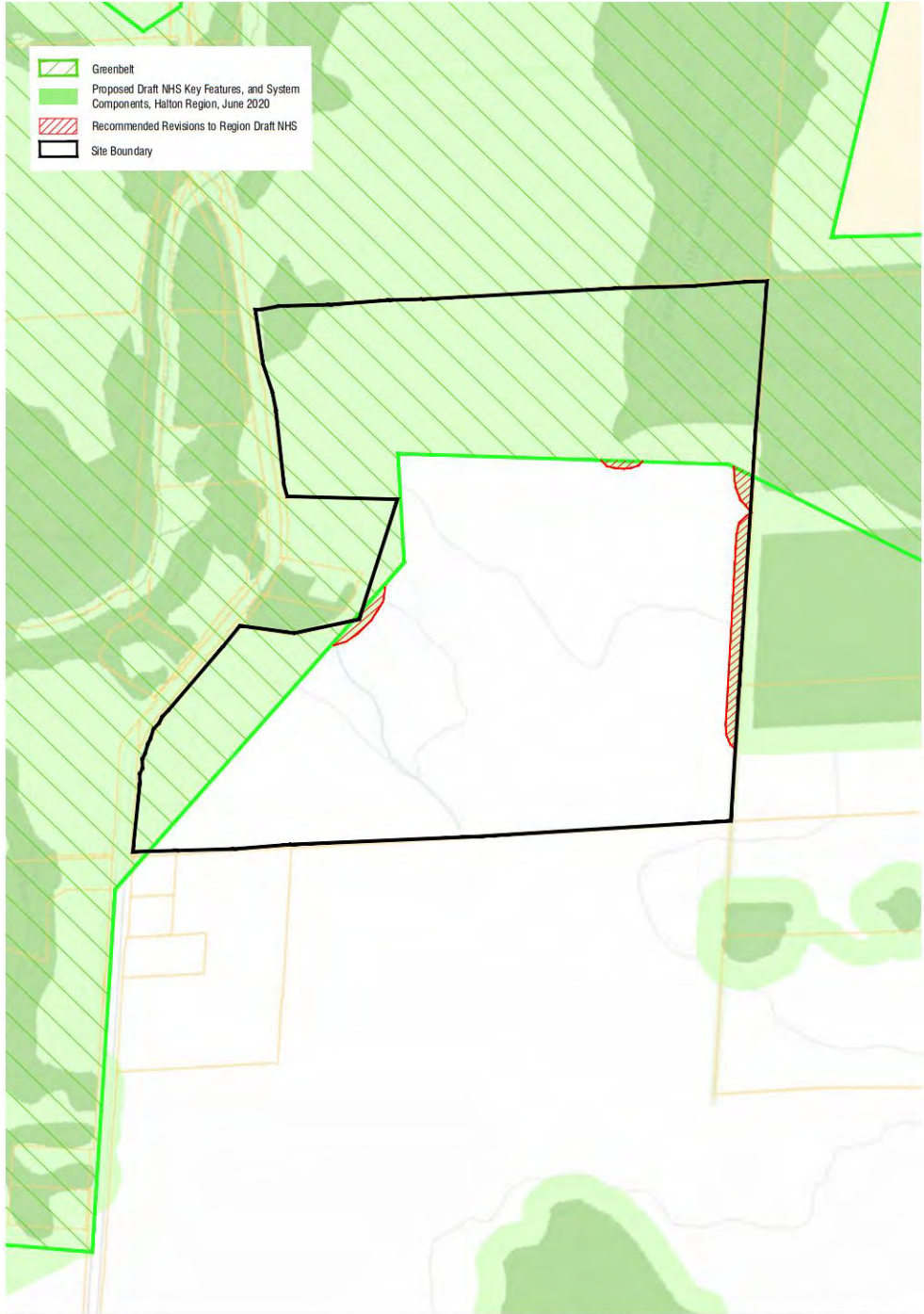
No.	Source	Submission	Response
		<p>Attached Argo (West Morrison Creek) Limited per Aird & Berlis email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – West Morrison Creek Property, Oakville</p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to a number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>While we understand that the NHS mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to the Region’s attention at this time so that they can be rectified or addressed prior to completion of the ROPR process.</p> <p>Attached to this memorandum is a map illustrating the subject lands with overlays of the Region’s proposed Draft NHS mapping and the NHS limits that have been approved by the Town of Oakville and Conservation Halton through the Final Upper West Morrison Creek Environmental Implementation Report Addendum (UWMC EIR) (Stoneybrook Consulting 2018). An Addendum to the 2018 UWMC EIR is on-going. The first submission of the Addendum was made in December 2018 (Jennifer Lawrence and Associates et.al.). Through the 2018 Addendum, the northern limit of Core 5 through the Argo lands was staked by the Region of Halton and agency staff have not raised any concerns with the staked limit as provided in the December 2018 submission.</p> <p>In comparing the Draft NHS mapping with the approved NHS limits, we note a number of locations on the subject lands where the Draft NHS mapping extends beyond the limits of the NHS identified in the North Oakville East Secondary Plan (OPA 272) and also beyond the NHS limits established through the EIR process.</p> <p>These areas are identified with red hatching in the attached map and described below:</p> <ol style="list-style-type: none"> 1. The proposed Draft NHS mapping includes the Upper West Morrison Creek corridor as well as optional linkages identified in the North Oakville East Secondary Plan (OPA 272). Through the 2018 UWMC EIR process, these optional linkages were refined or eliminated and an enhanced linkage corridor was identified and agreed to for the realigned creek. 2. In the southwestern quadrant of the subject lands, the proposed Draft NHS mapping extends into the proposed development and stormwater management block. The NHS boundary in this location is based on feature staking and application of OPA 272 buffers, and was approved by the Town, Region and CH through the first submission of the 2018 EIR/FSS Addendum. <p>It is requested that the Region adjusted their ROPR mapping to correspond with the NHS limits as approved through the 2018 UWMC EIR (Stoneybrook Consulting) and the on-going Addendum (Jennifer Lawrence and Associates et.al.). Can you please advise when the Region anticipates making these corrections?</p> <p>Lastly, at the Natural Heritage and Agricultural Systems Public Information Centre held on September 17, 2020 were informed by Ms. Leilani Lee-Yates, Environmental Planner at the Region, that the Region intends to retain ROP policies 116.2 and 116.3 which pertain to how the RNHS is delineated and implemented in North Oakville. We would kindly ask that you confirm that this will be the Region’s position going forward.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Thank you for receiving this submission and we look forward to your responses.</p> <p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments A – Current Draft Regional Natural Heritage System Mapping Overlaid on the EIR-approved NHS for West Morrison</p> <p>Attachment A: Current Draft Regional Natural Heritage System Mapping Overlaid on the EIR-approved NHS for West Morrison</p>  <p>Attached Argo Developments (5th Line) Ltd. per Aird & Berlis email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – Argo Fifth Line Property, Milton</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton's Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to a number of properties that Argo either owns or has purchase agreements for in Halton Region.</p> <p>While we understand that the mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to the Region's attention at this time so that they can either be rectified or addressed prior to completion of the ROPR process.</p> <p>Attached to this memorandum is a map illustrating the subject lands with overlays of the Region's proposed Draft NHS mapping and current natural feature mapping from Conservation Halton (CH) and the Ministry of Natural Resources and Forestry (MNRF) on-line sources.</p> <p>In comparing the proposed Draft NHS mapping with the current natural features as mapped by CH and MNRF on the subject lands we note the following:</p> <ol style="list-style-type: none"> 1. The proposed Draft NHS Key Features mapping layer extends onto the subject lands, but the subject lands are agricultural and do not support any Key Features. 2. The proposed Draft NHS Components layer which includes buffers, enhancements and linkages is inactive and appears blank for the subject lands. 3. It appears that the Draft NHS Key Features map layer has included a 30 m precautionary buffer applied to known wetland features as well as other unknown features. 4. There is a large semicircular shape that extends onto the northern boundary of the subject lands from the creek corridor to the north. It appears that this may be the result of applying a buffer to some feature, but there are no known features present. 5. Additionally, extending to the west and east from this semicircular shape are two geometric shapes which also do not appear to correspond with Key Features or precautionary buffers. <p>Based on our review we offer the following opinions and recommendations:</p> <ol style="list-style-type: none"> 1. The proposed Draft NHS Key Features mapping should be revised to correspond with the limits of actual Key Features which are all located outside the subject lands. 2. Mapping should be checked for artifacts and verify Key Feature presence / absence. 3. Buffers are not Key Features and should be removed from the proposed Draft NHS Key Features mapping layer. 4. The mapping of 30 m precautionary buffers pre-empts the application of Policy 116.1 which allows for refinements to the boundaries of the NHS through studies such as Environmental Impact Assessments (EIAs) required to determine the most appropriate measures for protecting Key Features. Furthermore, this approach implies that buffers are the only tool available to effectively protect Key Features. For these reasons we encourage the Region to consider removing precautionary buffers from its NHS mapping, especially within settlement areas where flexibility may be required, and alternative measures may be equally effective. <p>Thank you for receiving this submission and we look forward to your responses.</p> <p>Yours truly, Beacon Environmental</p> <p>Ken Ursic, M.Sc.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Principal</p> <p>Attachments A – Current Draft Regional Natural Heritage System Mapping Overlaid on Proposed NHS on Fifth Line Property</p> <p>Attachment A: Proposed Draft Regional Natural Heritage System Mapping Overlaid on Subject Property</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>
		<p>Attached Argo Developments (6th Line) Ltd. Per Aird & Berlis email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Natural Heritage Site-Specific Mapping – Argo Sixth Line, Milton</p> <p>Beacon Environmental Limited (Beacon) was retained by Argo Development Corporation (Argo) to undertake a review of the Region of Halton’s Draft Natural Heritage System (NHS) mapping being prepared through the Regional Official Plan Review Process (ROPR) as it has been applied to a number of properties that Argo either owns or has purchase agreements for in Halton Region.</p>	

No.	Source	Submission	Response
		<p>While we understand that the mapping is draft and subject to change, Argo believes it is important that any mapping errors, omissions or discrepancies be brought to the Region's attention at this time so that they can either be rectified or addressed prior to completion of the ROPR process.</p> <p>Attached to this memorandum is a map illustrating the subject lands with overlays of the Region's proposed Draft NHS mapping and known natural feature mapping.</p> <p>In comparing the proposed Draft NHS mapping with the known natural features on and adjacent to the subject lands we note the following:</p> <ol style="list-style-type: none"> 1. Portions of the subject lands include Key Features in the northeast corner but these are contained entirely within the Greenbelt. 2. The proposed Draft NHS Key Features mapping layer does not show any Key Features on the subject lands outside the Greenbelt. 3. The proposed Draft NHS System Components layer does however show buffers extending onto some of the lands that are outside the Greenbelt. 4. On the west side, it appears that a 30 m precautionary buffer has been applied to a small (<0.3 ha) treed area associated with a rural residential property at 5259 Sixth Line. This feature does not represent a Key Feature, so the mapping should be revised accordingly. 5. On the east side, it appears that a 30 m precautionary buffer that extends onto the subject lands has been applied to tree nursery operations located at 5244 and 5204 Trafalgar Road. The mapping should be revised to remove the tree nursery operation as a Key Feature as well as the associated buffer. As per the Region's current definition (s.295), a tree nursery is not considered a woodland. 6. On the north side, it appears that a 30 m vegetation protection zone (VPZ) has been applied to a woodland within the Greenbelt, however this buffer extends southwards outside the Greenbelt Plan Area. Greenbelt Plan VPZs are not to extend beyond the Greenbelt Plan boundary, so this VPZ should be terminated at the plan boundary. 7. The mapping of 30 m precautionary buffers pre-empts the application of ROP Policy 116.1 which allows for refinements to the boundaries of the NHS through studies such as Environmental Impact Assessments (EIAs) required to determine the most appropriate measures for protecting Key Features. Furthermore, this approach implies that buffers are the only tool available to effectively protect Key Features. For these reasons we encourage the Region to consider removing precautionary buffers from its NHS mapping, especially within settlement areas where flexibility may be required and alternative or complimentary measures may be equally effective. <p>For the reasons outlined above, we request that the Region revise its Draft NHS mapping.</p> <p>Thank you for receiving this submission and we look forward to your responses.</p> <p>Yours truly, Beacon Environmental Ken Ursic, M.Sc. Principal</p> <p>Attachments A – Current Draft Regional Natural Heritage System Mapping Overlaid on Sixth Line Lands</p> <p>Attachment A:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Current Draft Regional Natural Heritage System Mapping Overlaid on Sixth Line Lands</p>  <p>DRAFT</p> <p>ARGO 6th LINE Milton, Ontario Halton ROPR Proposed Draft NHS Key Features</p> <p>OCT 30, 2020 PROJECT 1639 SCALE 1:4000</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
28.	Argo	<p>Attached per email dated 2020-10-30 (Beacon Environmental)</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Discussion Papers (2017 - 2020) Review of Natural Heritage Issues Related to Evergreen Community, Burlington</p> <p>Dear Mr. Benson:</p> <p>Two separate letters have been submitted with comments on behalf of the Argo Development Corporation related to the Evergreen Community (Burlington) Limited and the Regional Official Plan Review (ROPR) Phase 2 process:</p> <ul style="list-style-type: none"> • A letter submitted by Wood Bull LLP (also dated Oct. 30, 2020 and sent via email) focusing on the interpretation of the Evergreen OMB decision presented in the technical memos developed in support of the Region’s Natural Heritage Discussion Paper (2020); and • This letter submitted by Beacon Environmental Limited (Beacon) focussing on the Draft Regional Natural Heritage System (RNHS) mapping and policy direction being put forward through the ROPR Phase 2 process. <p>These two letters should be considered together as part of Argo’s comments on the Phase 2 ROPR materials and directions presented.</p> <p>Natural Heritage Planning History</p> <p>Beacon has been providing natural heritage and technical support for the Evergreen Community since 2012. As part of Beacon’s ongoing and extensive work on these lands and in support of the planning process over the past eight years, Beacon has:</p> <ul style="list-style-type: none"> • led and undertaken the natural heritage components of all field work • led liaison with the Ministry of Natural Resources and Forestry (MNRF) and Ministry of Environment, Conservation and Parks (MECP) to resolve Species at Risk (SAR) matters • worked closely with the multi-disciplinary team of consultants assembled for this site (Evergreen Study Team) to develop plans, designs and reports intended to: <ul style="list-style-type: none"> ○ demonstrate conformity with the applicable Provincial, Regional, Local and Conservation Authority policies and legislation, and ○ provide a sound basis for community development compatible with the City’s sustainability objectives • provided evidence before the Ontario Municipal Board (OMB) case no. PL111358 related to the Regional Natural Heritage System (RNHS) mapping on this site • played a lead role in working with the City, Conservation Halton (CH) and the Region to confirm Terms of Reference for and complete the 2018 Tremaine Dundas Secondary Plan Subwatershed Study Update (TDSPSSU) with the Evergreen Study Team, and • worked closely with the Evergreen Study Team to develop and submit a comprehensive Environmental Implementation Report and Functional Servicing Study (EIR-FSS) in July 2015 and again in January 2020 following approval of the 2018 TDSPSSU and related Secondary Plan by the City, CH and the Region in July 2019. <p>Purpose of Submission</p>	<p>Regional staff received and reviewed the October 30, 2020 submissions made on behalf of Argo Development Corporation. Regional staff met with the landowners and their consultants on January 13, 2021, to discuss the submissions including the recognition of MoS for Secondary Plan (OPA 107) as part of the ROPR . Regional staff confirmed that the approved Secondary Plan mapping will be adopted through the ROPR process in accordance with Policy 116.1 of the ROP and subsequent to the meeting, the GIS shapefiles were received and documented. The revisions to policies and mapping for Halton’s Natural Heritage Theme will occur through the Stage 3, Phase 3 ROPR. Please see comments also under submission 216 below as two separate letters have been submitted with comments on behalf of the Evergreen Community (Burlington) Limited.</p>

No.	Source	Submission	Response
		<p>The following letter focusses on two requests emerging from Beacon’s review of the Region’s Natural Heritage Discussion Paper (2020) and mapping released as part of the ongoing ROPR process. A request to (1) update the RNHS mapping on the Evergreen site to recognize refinements that have been approved, and (2) recognize and remain consistent with the policy direction in Burlington OPA 107 (and related agreements) as approved by the Region in July 2019.</p> <p>Discussion of Requests</p> <p>REQUEST 1: UPDATE RNHS MAPPING ON THE EVERGREEN SITE</p> <p>The Draft RNHS mapping released as part of Phase 2 of the current ROPR process (see Attachment A) appears to be unchanged from the RNHS mapping in the 2009 ROP on the Evergreen site. However, the Region acknowledges the Evergreen OMB decision and related mapping agreements through the ROPR technical memos by Gladki and others, and clearly indicates in their Natural Heritage Discussion Paper (2020) that the intent was to incorporate OMB decisions into the ROPR mapping update process.</p> <p>Specifically, the Region’s Background Review Technical Memo (Gladki <i>et al.</i>, 2020) acknowledges that, in relation to the Evergreen OMB decision (PL111358): “<i>Mapping refinements were made as part of the Agreed Statement of Facts for this hearing and these should be reflected in the ROP mapping...</i>” (p.74). Therefore, it is assumed that these refinements not being included in the Draft RNHS mapping was simply an oversight. A copy of the Agreed Statement of Facts has been appended as Attachment B for reference.</p> <p>Subsequent to the settlement of Key Features before the OMB, the Key Features were staked with Region, CH and City staff in June 2016. These confirmed Key Feature boundaries were then used as the basis for the RNHS in the 2018 TDSPSSU which was approved by the City and CH in July and August of 2018, and the related Secondary Plan (OPA 107) which was approved by the Region, City and CH in May 2019 (see Attachment C).</p> <p>Based on this information, we respectfully request that the RNHS mapping on the Evergreen site be revised to reflect the agreed to Key Feature mapping. These corrected Key Feature boundaries are reflected in the approved OPA 107 mapping (July 2019) with linkages and precautionary 30 m buffers (see Attachment C) and are also reflected in the Refined NHS developed for the EIR-FSS (Jan 2020) with linkages and refined buffers determined in accordance with the buffer refinement approach outlined in OPA 107 (see Attachment A) and agreed to by the Region (see Attachment D).</p> <p>Specifics of the new Draft RNHS as compared to the EIR-FSS Refined NHS from January 2020 (see Attachment A) include:</p> <ul style="list-style-type: none"> • Area A: Regional NHS reflects 30 m buffer to unstaked feature limit; EIR-FSS boundary reflects staked woodland boundary + 25 m buffer as per agreed to approach with Region (see Attachment D). • Area B: Regional NHS reflects 30 m buffer to unstaked wetland; EIR-FSS boundary reflects staked wetland and woodland boundaries + 30 m to wetland and 10 m buffer between woodland and SWM pond as per agreed to approach with Region, as well as refined linkage shifted slightly. • Area C: Regional NHS reflects 30 m buffer to unstaked woodland plus some linkage; EIR-FSS boundary reflects staked woodland boundary + 20m / 25 m buffers as per agreed to approach with Region. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Area D: Regional NHS reflects 30 m buffer to unstaked woodland; EIR-FSS boundary reflects staked woodland boundary + 20 m buffers as per agreed to approach with Region. • Area E: Regional NHS reflects 30 m buffer to unevaluated small wetland; EIR-FSS boundary reflects removal of small wet area as settled at the OMB, staked wetland boundary + 30 m buffers as per agreed to approach with Region. • Area F: Regional NHS reflects 30 m buffer to unstaked woodland; EIR-FSS boundary reflects refined woodland boundary as agreed at the OMB and staked woodland boundary + 15 m buffers as per agreed to approach with Region. • Area G: Regional NHS reflects watercourse + 15 m buffer; EIR-FSS boundary reflects slightly realigned watercourse (as agreed through the Subwatershed Study) with 15 m buffer to wetlands associated with watercourse. <p>Based on the information above, it is respectfully requested that the Region update the ROPR NHS on the Evergreen lands to reflect the EIR-FSS Refined NHS (see Attachment A) OR, at least, to reflect the NHS on the Region-approved Secondary Plan (see Attachment C).</p> <p>REQUEST 2: RECOGNIZE BURLINGTON OPA 107 (AND RELATED AGREEMENTS)</p> <p>The Tremaine Dundas Secondary Plan Area has a long planning history that includes:</p> <ul style="list-style-type: none"> • Completion of a Secondary Plan Subwatershed Study (by AECOM and others) approved by the City, CH and the Region in December 2009; • An OMB settlement and decision for the Evergreen lands (PL111358, April; 6, 2016); • Completion of a Secondary Plan and Subwatershed Study Update based on site-specific studies completed between 2012 and 2018, approved by the City and CH in July 2018; and • Agreement from the Region on an application of the Region's <i>Framework for Regional Natural Heritage System Buffer Width Refinements for Area-Specific Planning</i> (2017) tailored to Evergreen to be applied at the Environmental Impact Assessment (EIA) or Environmental Implementation Report (EIR) stage (see Attachment D). <p>It is also understood based on responses to questions at the PIC held September 17, 2020 that the Region intends to carry forward the current ROP policies that respect the OMB-approved RNHS in North Oakville.</p> <p>Based on the information above, it is respectfully suggested that that it would be both appropriate and consistent with the approach to north Oakville to ensure that the ROPR policy direction remains consistent with both the mapping and policies developed for the Evergreen lands through OPA 107 in Burlington and approved by the Region (July 2019).</p> <p>Summary of Requests</p> <p>Based on the information above and attached, we respectfully request that the Region:</p> <ol style="list-style-type: none"> 1. revise the RNHS mapping on the Evergreen site to reflect the Key Features mapping agreed to as part of the Evergreen OMB decision (PL111358) (see Attachment B2) as reflected in either: <ol style="list-style-type: none"> a. the Region-approved Tremaine Dundas Secondary Plan (see Attachment C) or b. the EIR-FSS Refined NHS (see Attachment A) with buffers refined in accordance with the approach agreed to by the Region (see Attachment D); 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

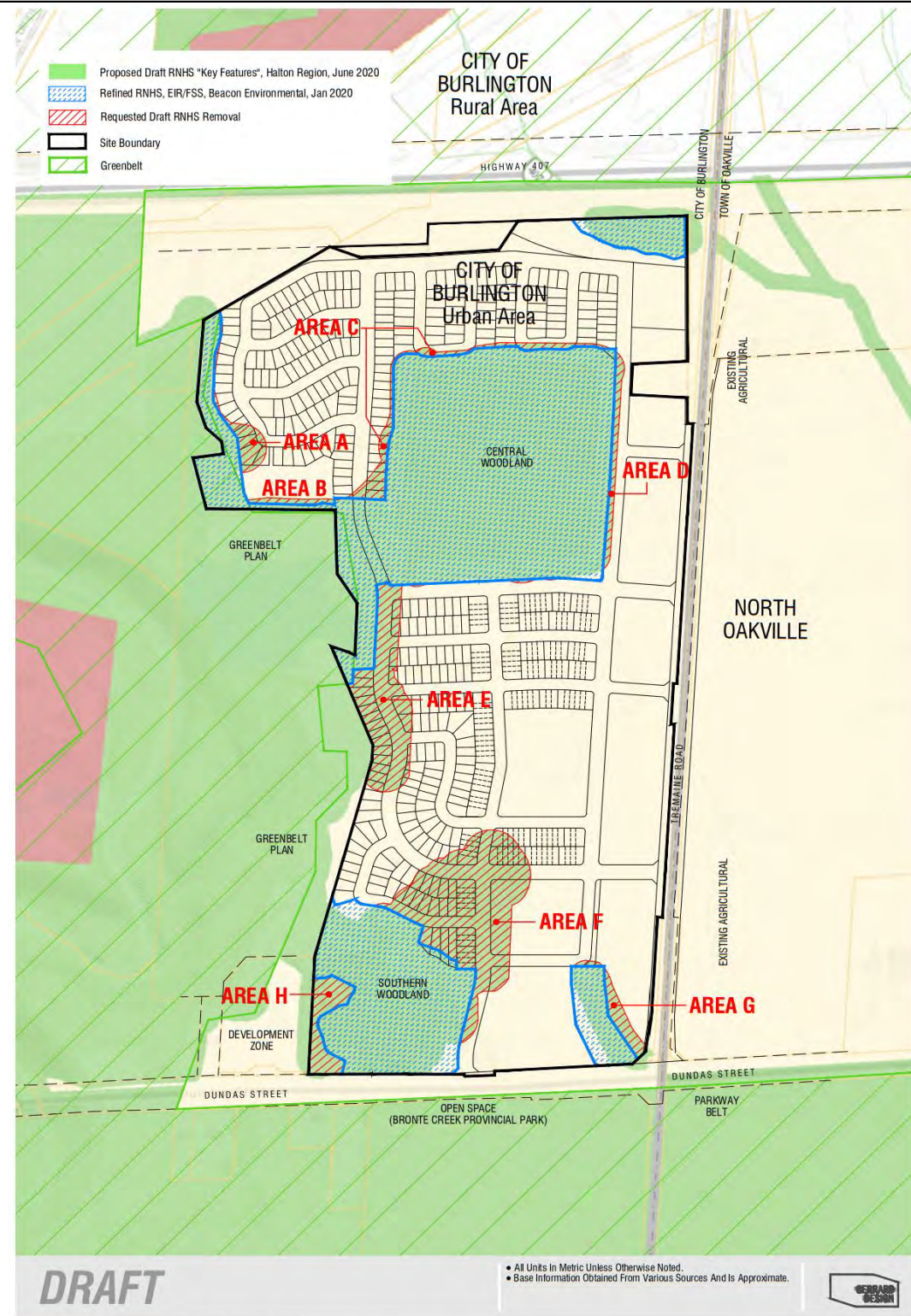
No.	Source	Submission	Response
		<p>2. ensure that the ROPR policy direction remains consistent with both the mapping and policies developed for the Evergreen lands through Burlington OPA 107 (as approved by the Region in July 2019); and</p> <p>3. confirm the previously agreed-to buffer width refinement approach will be respected going forward through the EIR process.</p> <p>We thank you for the opportunity to provide comments on the Region's Natural Heritage Discussion Paper (2020) and draft RNHS mapping through the Phase 2 ROPR process.</p> <p>We look forward to the Region's responses to our requests. Please do not hesitate to contact us if clarification or additional information is required, or if a conference or video call would be helpful.</p> <p>Prepared by: Beacon Environmental Margot Ursic, B.A., M.Sc. Principal, Senior Planning Ecologist mursic@beaconenviro.com C: 519.803.8101</p> <p>Reviewed by: Beacon Environmental Ken Ursic, B.Sc., M. Sc. Principal, Senior Ecologist</p> <p>Attachment per above email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review – Phase 2: Discussion Papers (2017 - 2020) Review of Natural Heritage Issues Related to Evergreen Community, Burlington</p> <p>Dear Mr. Benson:</p> <p>Two separate letters have been submitted with comments on behalf of the Argo Development Corporation related to the Evergreen Community (Burlington) Limited and the Regional Official Plan Review (ROPR) Phase 2 process:</p> <ul style="list-style-type: none"> • A letter submitted by Wood Bull LLP (also dated Oct. 30, 2020 and sent via email) focusing on the interpretation of the Evergreen OMB decision presented in the technical memos developed in support of the Region's Natural Heritage Discussion Paper (2020); and • This letter submitted by Beacon Environmental Limited (Beacon) focussing on the Draft Regional Natural Heritage System (RNHS) mapping and policy direction being put forward through the ROPR Phase 2 process. <p>These two letters should be considered together as part of Argo's comments on the Phase 2 ROPR materials and directions presented.</p> <p>Natural Heritage Planning History</p> <p>Beacon has been providing natural heritage and technical support for the Evergreen Community since 2012. As part of Beacon's ongoing and extensive work on these lands and in support of the planning process over the past eight years, Beacon has:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • led and undertaken the natural heritage components of all field work • led liaison with the Ministry of Natural Resources and Forestry (MNR) and Ministry of Environment, Conservation and Parks (MECP) to resolve Species at Risk (SAR) matters • worked closely with the multi-disciplinary team of consultants assembled for this site (Evergreen Study Team) to develop plans, designs and reports intended to: <ul style="list-style-type: none"> ○ demonstrate conformity with the applicable Provincial, Regional, Local and Conservation Authority policies and legislation, and ○ provide a sound basis for community development compatible with the City's sustainability objectives • provided evidence before the Ontario Municipal Board (OMB) case no. PL111358 related to the Regional Natural Heritage System (RNHS) mapping on this site played a lead role in working with the City, Conservation Halton (CH) and the Region to confirm Terms of Reference for and complete the 2018 Tremaine Dundas Secondary Plan Subwatershed Study Update (TDSOSSU) with the Evergreen Study Team, and • worked closely with the Evergreen Study Team to develop and submit a comprehensive Environmental Implementation Report and Functional Servicing Study (EIR-FSS) in July 2015 and again in January 2020 following approval of the 2018 TDSOSSU and related Secondary Plan by the City, CH and the Region in July 2019. <p>Purpose of Submission</p> <p>The following letter focusses on two requests emerging from Beacon's review of the Region's Natural Heritage Discussion Paper (2020) and mapping released as part of the ongoing ROPR process. A request to (1) update the RNHS mapping on the Evergreen site to recognize refinements that have been approved, and (2) recognize and remain consistent with the policy direction in Burlington OPA 107 (and related agreements) as approved by the Region in July 2019.</p> <p>Discussion of Requests</p> <p>REQUEST 1: UPDATE RNHS MAPPING ON THE EVERGREEN SITE</p> <p>The Draft RNHS mapping released as part of Phase 2 of the current ROPR process (see Attachment A) appears to be unchanged from the RNHS mapping in the 2009 ROP on the Evergreen site. However, the Region acknowledges the Evergreen OMB decision and related mapping agreements through the ROPR technical memos by Gladki and others, and clearly indicates in their Natural Heritage Discussion Paper (2020) that the intent was to incorporate OMB decisions into the ROPR mapping update process.</p> <p>Specifically, the Region's Background Review Technical Memo (Gladki <i>et al.</i>, 2020) acknowledges that, in relation to the Evergreen OMB decision (PL111358): "<i>Mapping refinements were made as part of the Agreed Statement of Facts for this hearing and these should be reflected in the ROP mapping...</i>" (p.74). Therefore, it is assumed that these refinements not being included in the Draft RNHS mapping was simply an oversight. A copy of the Agreed Statement of Facts has been appended as Attachment B for reference.</p> <p>Subsequent to the settlement of Key Features before the OMB, the Key Features were staked with Region, CH and City staff in June 2016. These confirmed Key Feature boundaries were then used as the basis for the RNHS in the 2018 TDSOSSU which was approved by the City and CH in July and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>August of 2018, and the related Secondary Plan (OPA 107) which was approved by the Region, City and CH in May 2019 (see Attachment C).</p> <p>Based on this information, we respectfully request that the RNHS mapping on the Evergreen site be revised to reflect the agreed to Key Feature mapping. These corrected Key Feature boundaries are reflected in the approved OPA 107 mapping (July 2019) with linkages and precautionary 30 m buffers (see Attachment C) and are also reflected in the Refined NHS developed for the EIR-FSS (Jan 2020) with linkages and refined buffers determined in accordance with the buffer refinement approach outlined in OPA 107 (see Attachment A) and agreed to by the Region (see Attachment D).</p> <p>Specifics of the new Draft RNHS as compared to the EIR-FSS Refined NHS from January 2020 (see Attachment A) include:</p> <ul style="list-style-type: none"> • Area A: Regional NHS reflects 30 m buffer to unstaked feature limit; EIR-FSS boundary reflects staked woodland boundary + 25 m buffer as per agreed to approach with Region (see Attachment D). • Area B: Regional NHS reflects 30 m buffer to unstaked wetland; EIR-FSS boundary reflects staked wetland and woodland boundaries + 30 m to wetland and 10 m buffer between woodland and SWM pond as per agreed to approach with Region, as well as refined linkage shifted slightly. • Area C: Regional NHS reflects 30 m buffer to unstaked woodland plus some linkage; EIR-FSS boundary reflects staked woodland boundary + 20m / 25 m buffers as per agreed to approach with Region. • Area D: Regional NHS reflects 30 m buffer to unstaked woodland; EIR-FSS boundary reflects staked woodland boundary + 20 m buffers as per agreed to approach with Region. • Area E: Regional NHS reflects 30 m buffer to unevaluated small wetland; EIR-FSS boundary reflects removal of small wet area as settled at the OMB, staked wetland boundary + 30 m buffers as per agreed to approach with Region. • Area F: Regional NHS reflects 30 m buffer to unstaked woodland; EIR-FSS boundary reflects refined woodland boundary as agreed at the OMB and staked woodland boundary + 15 m buffers as per agreed to approach with Region. • Area G: Regional NHS reflects watercourse + 15 m buffer; EIR-FSS boundary reflects slightly realigned watercourse (as agreed through the Subwatershed Study) with 15 m buffer to wetlands associated with watercourse. <p>Based on the information above, it is respectfully requested that the Region update the ROPR NHS on the Evergreen lands to reflect the EIR-FSS Refined NHS (see Attachment A) OR, at least, to reflect the NHS on the Region-approved Secondary Plan (see Attachment C).</p> <p>REQUEST 2: RECOGNIZE BURLINGTON OPA 107 (AND RELATED AGREEMENTS)</p> <p>The Tremaine Dundas Secondary Plan Area has a long planning history that includes:</p> <ul style="list-style-type: none"> • Completion of a Secondary Plan Subwatershed Study (by AECOM and others) approved by the City, CH and the Region in December 2009; • An OMB settlement and decision for the Evergreen lands (PL111358, April; 6, 2016); • Completion of a Secondary Plan and Subwatershed Study Update based on site-specific studies completed between 2012 and 2018, approved by the City and CH in July 2018; and 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> Agreement from the Region on an application of the Region's <i>Framework for Regional Natural Heritage System Buffer Width Refinements for Area-Specific Planning</i> (2017) tailored to Evergreen to be applied at the Environmental Impact Assessment (EIA) or Environmental Implementation Report (EIR) stage (see Attachment D). <p>It is also understood based on responses to questions at the PIC held September 17, 2020 that the Region intends to carry forward the current ROP policies that respect the OMB-approved RNHS in North Oakville.</p> <p>Based on the information above, it is respectfully suggested that that it would be both appropriate and consistent with the approach to north Oakville to ensure that the ROPR policy direction remains consistent with both the mapping and policies developed for the Evergreen lands through OPA 107 in Burlington and approved by the Region (July 2019).</p> <p>Summary of Requests</p> <p>Based on the information above and attached, we respectfully request that the Region:</p> <ol style="list-style-type: none"> revise the RNHS mapping on the Evergreen site to reflect the Key Features mapping agreed to as part of the Evergreen OMB decision (PL111358) (see Attachment B2) as reflected in either: <ol style="list-style-type: none"> the Region-approved Tremaine Dundas Secondary Plan (see Attachment C) or the EIR-FSS Refined NHS (see Attachment A) with buffers refined in accordance with the approach agreed to by the Region (see Attachment D); ensure that the ROPR policy direction remains consistent with both the mapping and policies developed for the Evergreen lands through Burlington OPA 107 (as approved by the Region in July 2019); and confirm the previously agreed-to buffer width refinement approach will be respected going forward through the EIR process. <p>We thank you for the opportunity to provide comments on the Region's Natural Heritage Discussion Paper (2020) and draft RNHS mapping through the Phase 2 ROPR process.</p> <p>We look forward to the Region's responses to our requests. Please do not hesitate to contact us if clarification or additional information is required, or if a conference or video call would be helpful.</p> <p>Prepared by: Beacon Environmental Margot Ursic, B.A., M.Sc. Principal, Senior Planning Ecologist Reviewed by: Beacon Environmental Ken Ursic, B.Sc., M.Sc. Principal, Senior Ecologist</p> <p>Attachment A: Current Draft Regional Natural Heritage System Mapping Overlaid on Current Evergreen Site Plan and RNHS (2020)</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
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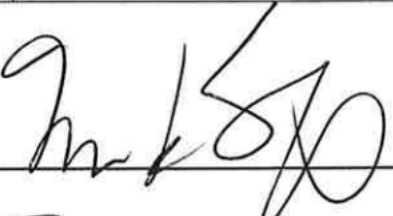




EVERGREEN COMMUNITY | Burlington, Ontario
Halton ROPR Proposed Draft NHS Key Feature and Concept Plan

OCT 30, 2020
PROJECT 0035
SCALE 1:4000

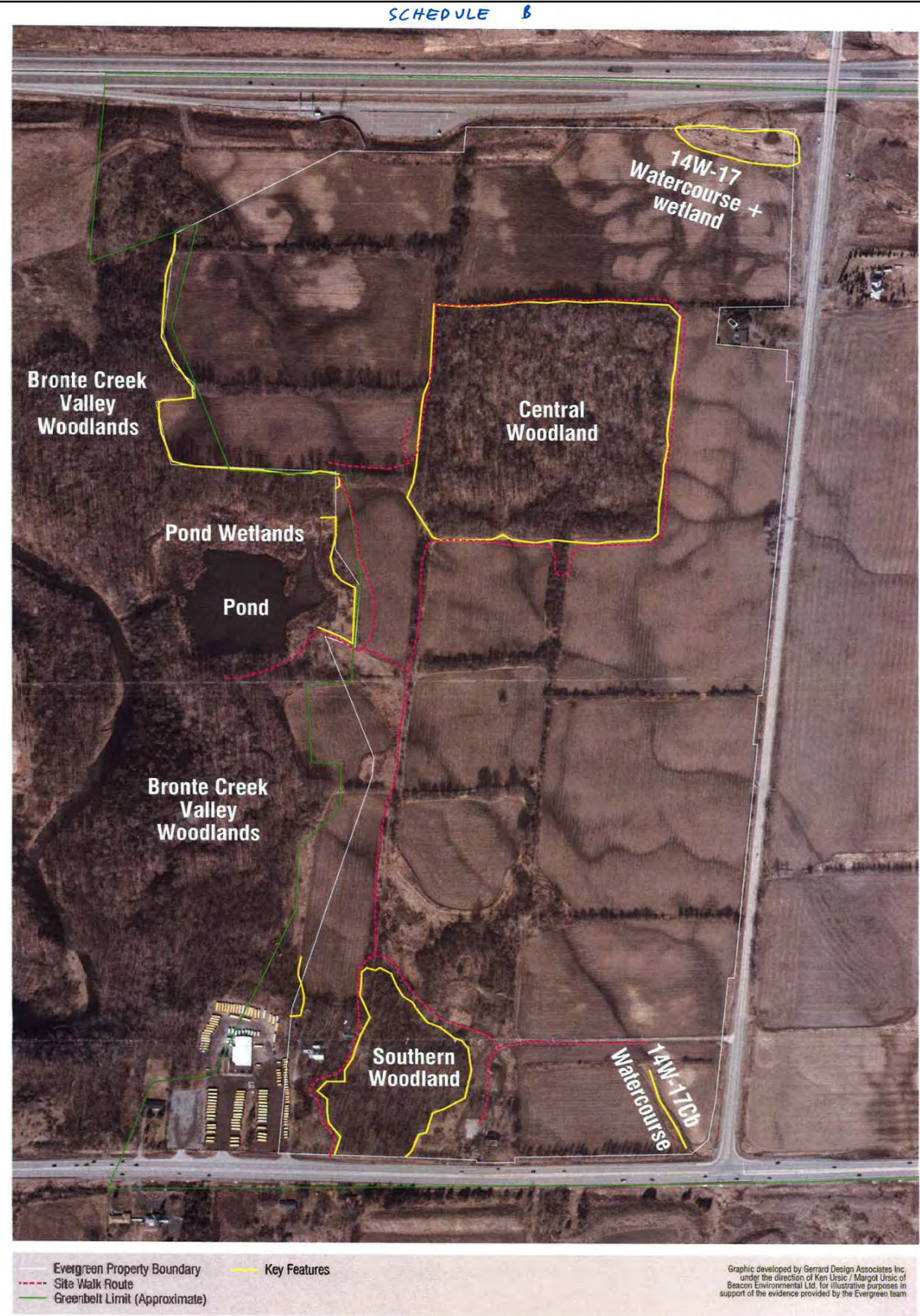
Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response
		<p>Attachment B: Exhibit 273 - Agreed Statement from OMB Case No. PL111358 and Exhibit 275 - Agreed to Regional Natural Heritage System Map from OMB Case No. PL111358</p> <p style="text-align: right;"><i>Ex. 273</i></p> <h2 style="text-align: center;">Agreed Statement</h2> <p>To: Ontario Municipal Board</p> <p>From: Ken Ursic and Mirek Sharp</p> <p>Date: June 4, 2015</p> <p>Ref: OMB File No. PL111358, Evergreen Community (Burlington) Ltd. [Evergreen Appeal]</p> <p>Re: Natural Heritage Meeting of Experts</p> <p style="text-align: center;">Points of Agreement / Disagreement from Experts Meeting / Site Visit – June 3, 2015</p> <hr/> <p>A natural heritage experts' meeting was held on June 3rd, 2015 in regard to the Evergreen Appeal. In attendance were: Ken Ursic, Senior Ecologist from Beacon Environmental Ltd. representing Evergreen (the appellant) and Mirek Sharp, Senior Ecologist from North-South Environmental Inc. on behalf of the Region of Halton.</p> <p>The meeting was held on the Evergreen site on June 3rd between 1 pm to 4 pm. The purpose of the meeting was to:</p> <ol style="list-style-type: none"> 1. provide Mr. Sharp with an opportunity to review the site features; 2. to review the boundaries of features, enhancements and linkages for the purpose of considering refinements to Maps 1 and 1G in ROPA 38; 3. articulate points of agreement and disagreement with the intent of narrowing the issues for the benefit of the Board. <p>We agree that:</p> <ol style="list-style-type: none"> 1. It will be necessary to undertake an Environmental Impact Assessment (EIA) pursuant to s. 118(3) of ROPA 38, if and when an application for development is submitted for the Evergreen Lands; 2. Feature boundaries as verified during the Expert's Meeting are for the purpose of considering refinements to Maps 1 and 1G; 3. Appropriate buffer widths are dependant in part on adjacent land uses. <p>The route walked is illustrated on the attached Site Walk Route map (Schedule A).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response										
		<p>The following table summarizes points of agreement and disagreement from this meeting.</p> <table border="1" data-bbox="671 310 1936 1457"> <tr> <td data-bbox="671 310 1003 758">1. Key Features</td> <td data-bbox="1003 310 1936 758"> <ul style="list-style-type: none"> Agreement that the attached Key Features map (Schedule B) appropriately identifies the boundaries of all Key Features that are present on and immediately adjacent to the Evergreen Lands for the purpose of considering refinements to Maps 1 and 1G. The Key Features boundaries are subject to minor refinements that may occur as part of the feature limit confirmation (staking) process with the Region of Halton, and Conservation Halton (CH) as it relates to regulated features, to be undertaken as part of the EIA process. Agreement that, based on the information provided to date, all Key Features on and immediately adjacent to the Evergreen Lands, including Significant Habitat of Endangered and Threatened Species, Significant Wetlands, Significant Woodlands, Significant Valleylands, Significant Wildlife Habitat, and Fish Habitat have been appropriately included in the attached Key Features map. </td> </tr> <tr> <td data-bbox="671 758 1003 1110">2. Watercourses (as per ROPA 38 115.3(5)) and Wetlands (as per ROPA 38 115.3(6))</td> <td data-bbox="1003 758 1936 1110"> <ul style="list-style-type: none"> Agreement that the attached Key Features map (Schedule B) appropriately identifies the watercourses and wetlands that are present on the Evergreen Lands for the purpose of considering refinements to Maps 1 and 1G. The limits of these watercourses and wetlands are subject to minor refinements that may occur as part of feature limit confirmation (staking) process with the Region of Halton and Conservation Halton (CH) to be undertaken as part of the EIA process . Agreement that Tributary 14W-17Cb can be relocated provided its hydrological and ecological functions are maintained and an appropriate naturalized Buffer / setback is provided as envisioned by the Subwatershed Study, and subject to CH review and all necessary permitting. </td> </tr> <tr> <td data-bbox="671 1110 1003 1266">3. Linkages</td> <td data-bbox="1003 1110 1936 1266"> <ul style="list-style-type: none"> Agreement that the attached Key Features/Linkages map (Schedule C) appropriately identifies the location and extent of the two local Linkages and that the extent and limits of linkages will be refined, if necessary when the feature limits are confirmed through the EIA process. </td> </tr> <tr> <td data-bbox="671 1266 1003 1393">4. Enhancements</td> <td data-bbox="1003 1266 1936 1393"> <ul style="list-style-type: none"> We agree that while some enhancements can be identified at this point in time (e.g. in the key features and linkage areas), other enhancements may be identified later through the planning process. </td> </tr> <tr> <td data-bbox="671 1393 1003 1457">5. Buffers</td> <td data-bbox="1003 1393 1936 1457"> <ul style="list-style-type: none"> <u>We disagree as to whether buffers can be determined at this point in time.</u> </td> </tr> </table> <p data-bbox="671 1457 1936 1822"> Mirek Sharp  Date: <u>8 June / 2015</u> Ken Ursic  Date: <u>June 8, 2015</u> </p>	1. Key Features	<ul style="list-style-type: none"> Agreement that the attached Key Features map (Schedule B) appropriately identifies the boundaries of all Key Features that are present on and immediately adjacent to the Evergreen Lands for the purpose of considering refinements to Maps 1 and 1G. 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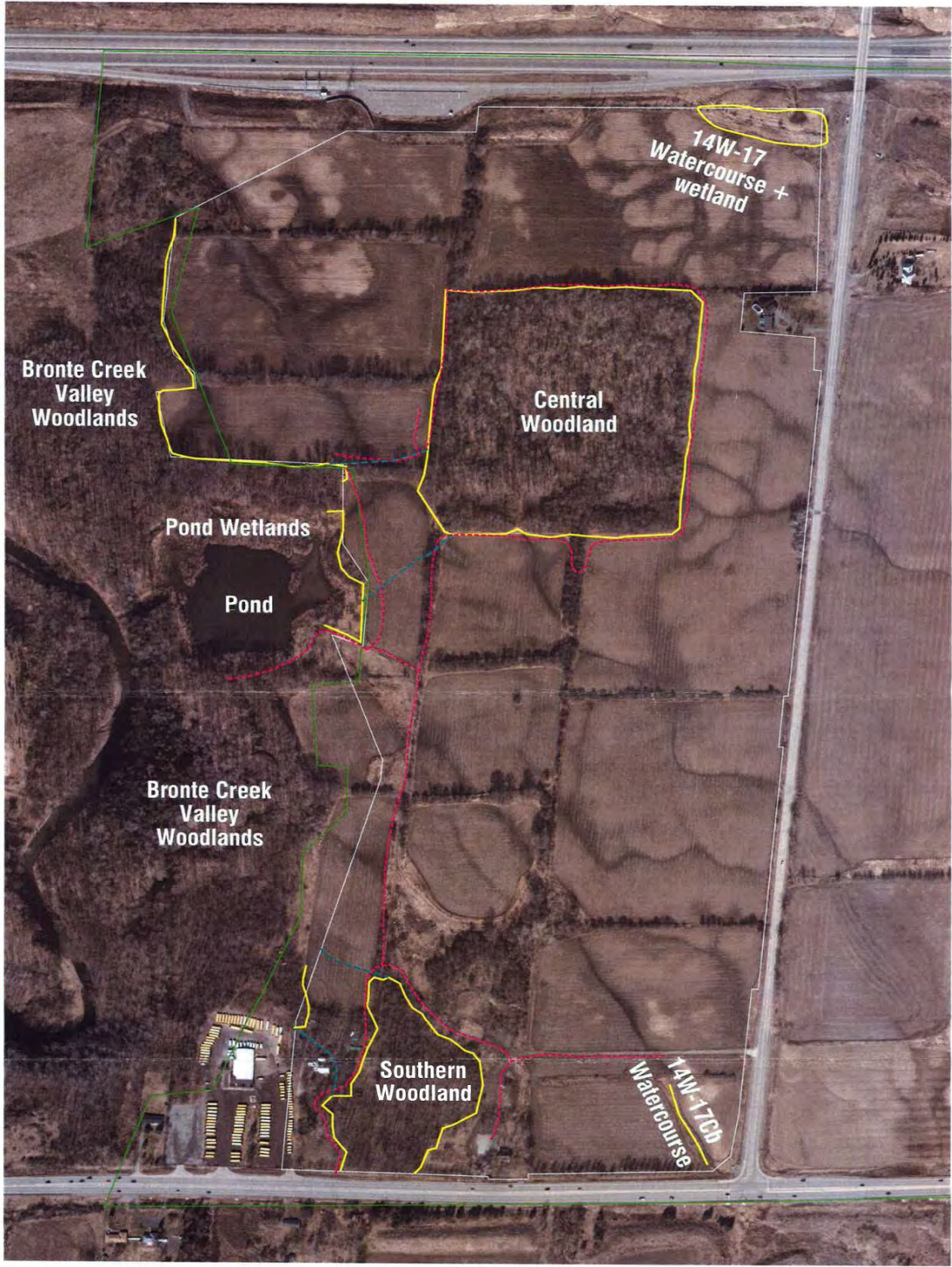
No.	Source	Submission	Response
		<p style="text-align: center;">SCHEDULE A</p>  <p> — Evergreen Property Boundary - - - Site Walk Route — Greenbelt Limit (Approximate) </p> <p style="font-size: small;">Graphic developed by Gerrard Design Associates Inc. under the direction of Ken Ursic / Mengot Ursic of Beacon Environmental Ltd. for illustrative purposes in support of the evidence provided by the Evergreen team.</p> <p style="text-align: center;">SITE WALK ROUTE (JUNE 3, 2015)</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
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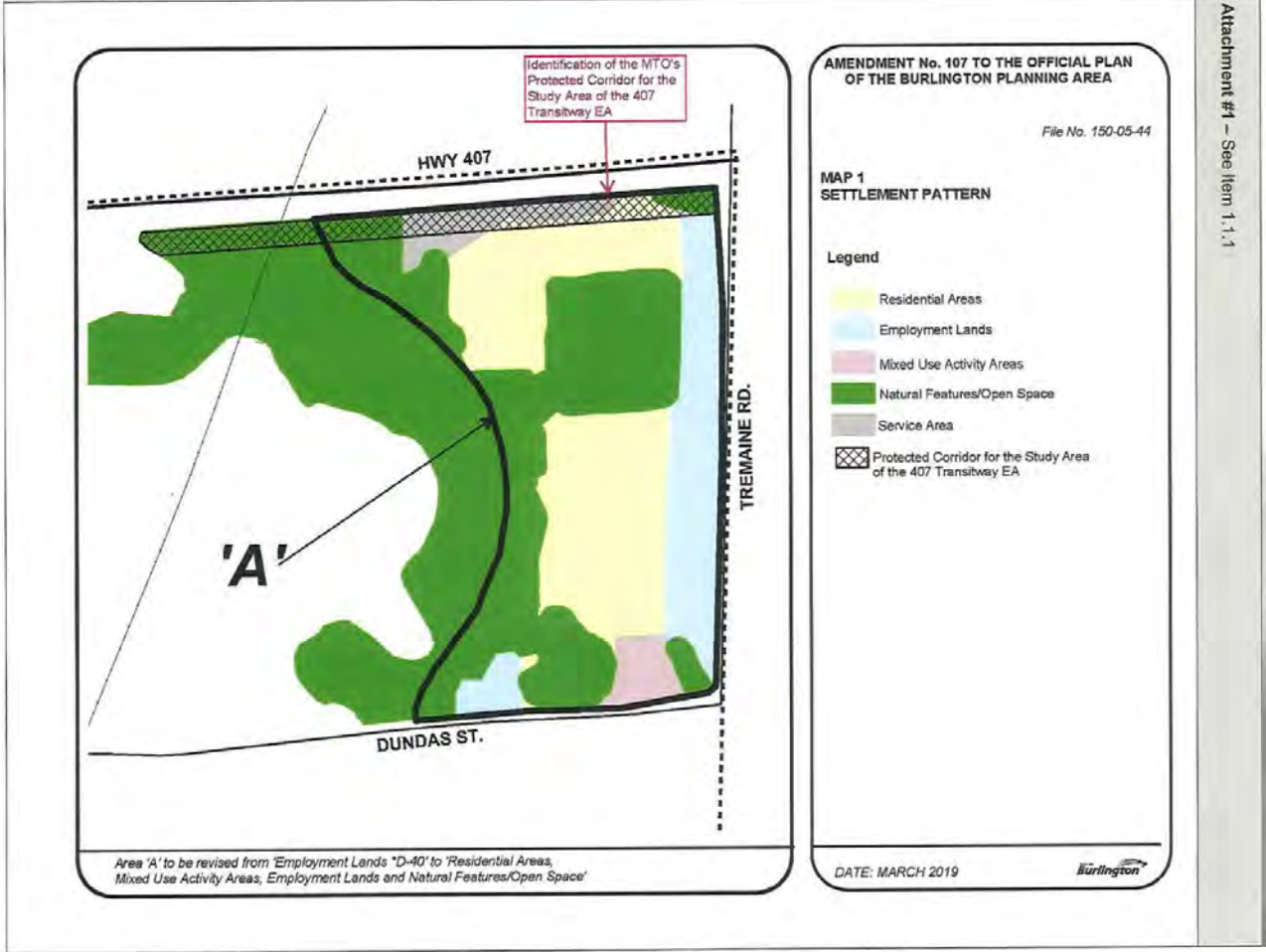


KEY FEATURES


Comments are acknowledged. Please see above for a detailed response.

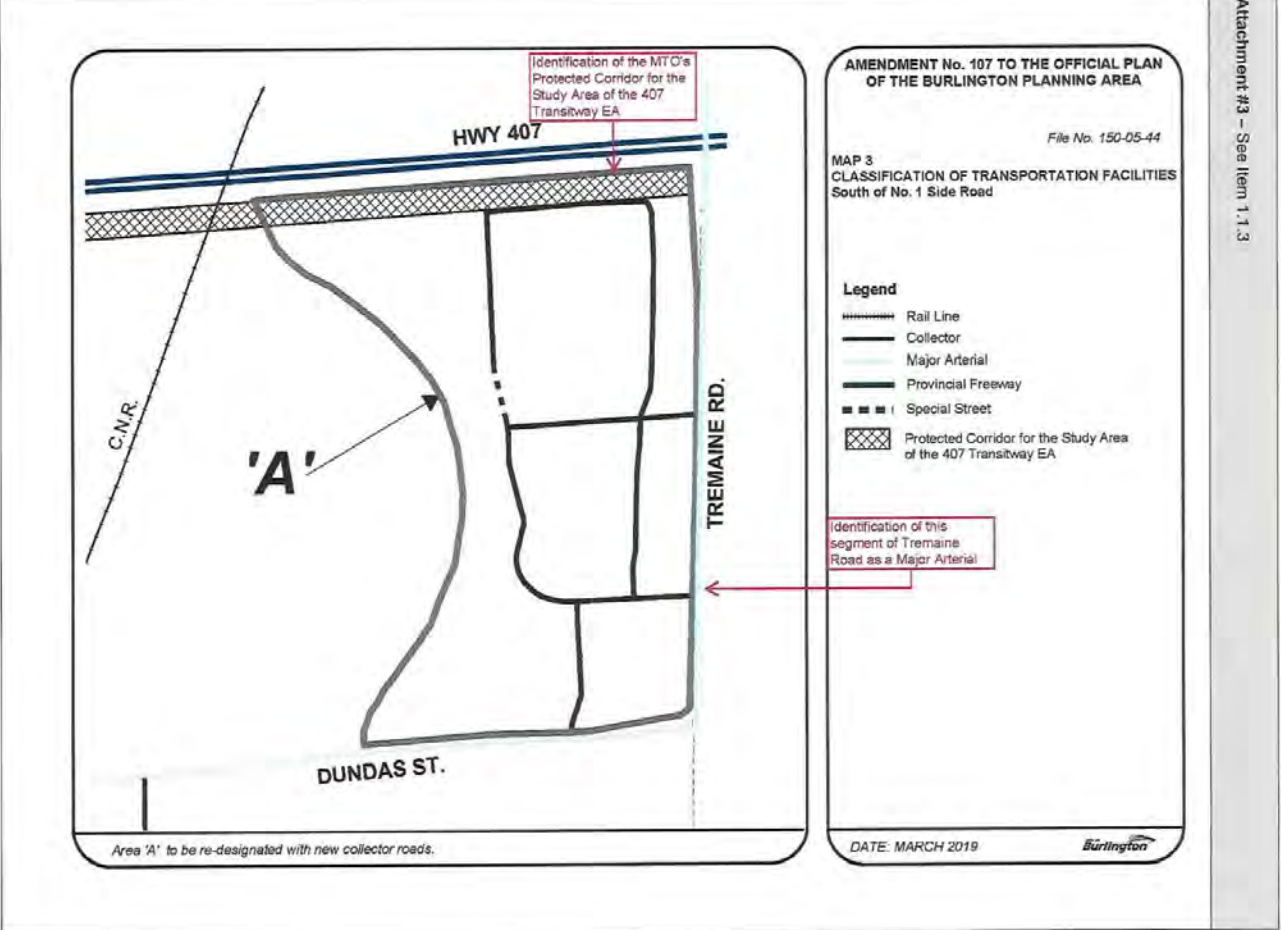
No.	Source	Submission	Response
		<p style="text-align: center;">SCHEDULE C</p>  <p style="text-align: center;">KEY FEATURES + LINKAGES</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

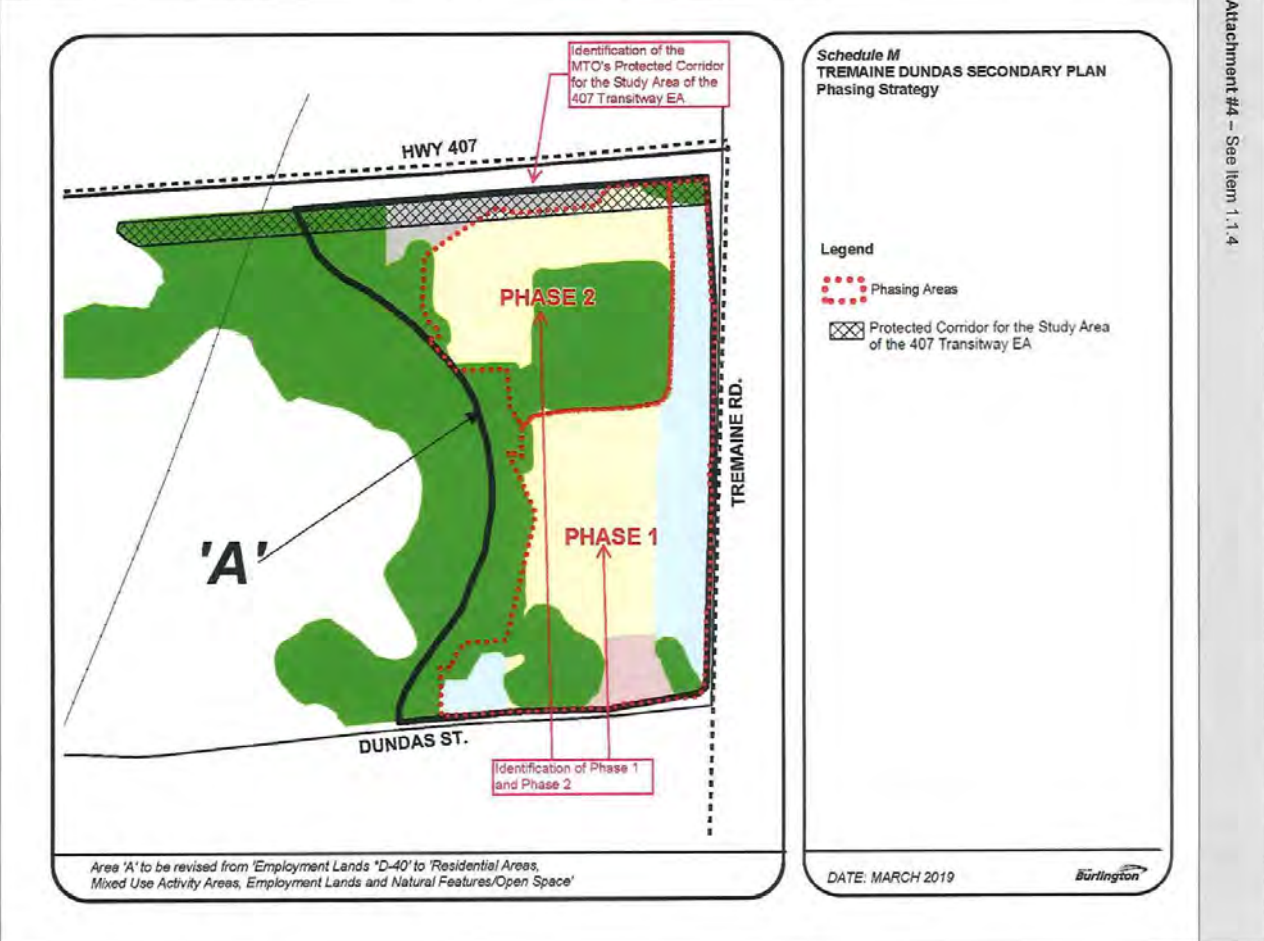
No.	Source	Submission	Response
		<p>The map displays an aerial view of a rural area with several overlays. A black outline defines the 'Evergreen Property'. A solid green line indicates the 'Greenbelt Limit'. Dashed green lines represent 'Linkages'. A yellow outline highlights 'Key Features'. Light green shaded regions denote '30 metre Buffer and Linkage Areas'. A dashed grey line shows the 'Municipal Boundary'. The map is bounded by Hwy 407 to the north, Dundas St to the south, and Tremaine Rd to the east. A legend in the bottom-left corner explains the symbols. A north arrow and a scale bar (0 to 400 meters) are located in the bottom-right corner.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment C: Regional Natural Heritage System Map from Tremaine Dundas Secondary Plan as Approved by the Region (2019)</p>  <p>Attachment #1 – See Item 1.1.1</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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No.	Source	Submission	Response
		<div data-bbox="717 258 1942 1165" style="border: 1px solid black; padding: 10px;"> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  <p style="font-size: small; margin-top: 5px;">Identification of the MTO's Protected Corridor for the Study Area of the 407 Transitway EA</p> <p style="font-size: small; margin-top: 5px;">Area 'A' to be re-designated from "Land Use to be Determined" to "Residential Medium Density", "Mixed Use Corridor-General", "Mixed Use Corridor-Employment", "Business Corridor", "Natural Heritage System", "Service Area" and "Major Parks and Open Space".</p> </div> <div style="width: 50%; border: 1px solid black; padding: 5px;"> <p style="text-align: center; font-weight: bold; font-size: small;">AMENDMENT No. 107 TO THE OFFICIAL PLAN OF THE BURLINGTON PLANNING AREA</p> <p style="text-align: right; font-size: x-small;">File No. 150-05-44</p> <p style="font-weight: bold; font-size: small;">MAP 2 COMPREHENSIVE LAND USE PLAN- URBAN PLANNING AREA</p> <p>Legend</p> <ul style="list-style-type: none"> Residential - Medium Density Mixed Use Corridor - General Mixed Use Corridor - Employment Business Corridor Natural Heritage System Major Parks and Open Space Service Area Area for Future Study Protected Corridor for the Study Area of the 407 Transitway EA <p style="font-size: x-small; margin-top: 5px;">DATE: MARCH 2019 </p> </div> </div> </div> <div data-bbox="1895 258 1942 504" style="writing-mode: vertical-rl; transform: rotate(180deg); font-size: x-small;">Attachment #2 - See Item 1.1.2</div>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="665 1044 689 1145" style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 17 of 18</p>  <p data-bbox="1526 314 1836 354">AMENDMENT No. 107 TO THE OFFICIAL PLAN OF THE BURLINGTON PLANNING AREA</p> <p data-bbox="1721 391 1836 405">File No. 150-05-44</p> <p data-bbox="1516 411 1846 455">MAP 3 CLASSIFICATION OF TRANSPORTATION FACILITIES South of No. 1 Side Road</p> <p data-bbox="1526 532 1588 546">Legend</p> <ul data-bbox="1526 556 1805 707" style="list-style-type: none"> — Rail Line — Collector — Major Arterial — Provincial Freeway — Special Street ▨ Protected Corridor for the Study Area of the 407 Transitway EA <p data-bbox="1516 758 1672 808">Identification of this segment of Tremaine Road as a Major Arterial</p> <p data-bbox="1526 1060 1659 1074">DATE: MARCH 2019</p> <p data-bbox="1752 1060 1827 1074">Burlington</p> <p data-bbox="1898 258 1930 499" style="writing-mode: vertical-rl; transform: rotate(180deg);">Attachment #3 – See Item 1.1.3</p>	<p data-bbox="1986 314 2769 374">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="668 1048 699 1159" style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 18 of 18</p>  <p data-bbox="668 1209 1181 1340">Attachment D: Agreement on Approach to Buffers for the Evergreen Site with the Region (July 2019)</p>	<p data-bbox="1989 302 2766 372">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>From: Margot Ursic To: Margot Ursic Subject: FW: Evergreen - Natural Heritage System Buffers Date: Friday, October 30, 2020 2:26:43 PM</p> <hr/> <p>From: Clark, Richard <Richard.Clark@halton.ca> Sent: Thursday, July 18, 2019 4:47 PM To: Minaji, Rosalind (Rosalind.Minaji@burlington.ca) <Rosalind.Minaji@burlington.ca>; 'Andreas.Houlios@burlington.ca' <Andreas.Houlios@burlington.ca> Cc: Marshall, Brooke <Brooke.Marshall@halton.ca>; McCabe, Owen <Owen.McCabe@halton.ca>; Huycke, Adam <Adam.Huycke@halton.ca>; Lesley Matich (lmatic@hrca.on.ca) <lmatic@hrca.on.ca>; 'Emma DeFields' <edefields@hrca.on.ca>; Sarah Matchett (smatchett@hrca.on.ca) <smatchett@hrca.on.ca>; Jennifer Lawrence <jennifer@jplanning.ca>; Malik, Umar (Umar.Malik@burlington.ca) <Umar.Malik@burlington.ca>; Ireland, Heather <Heather.Ireland@halton.ca>; 'tperruzza@firsturban.ca' <tperruzza@firsturban.ca>; kevin@argoland.com; ITang@blg.com; 'Margot Ursic' (mursic@beaconenviro.com) <mursic@beaconenviro.com> Subject: FW: Evergreen - Natural Heritage System Buffers</p> <p>Thanks you Margot.</p> <p>Based on the revisions described below, which Halton Region staff reviewed in consultation with CH staff, we note on a without prejudice basis that the attached July 17, 2019 revised memo now reflects the various areas of agreement/disagreement regarding Buffers discussed to date.</p> <p>Please let us know if we can be of any further assistance.</p> <p>Regards, Richard</p> <hr/> <p>From: Margot Ursic <mursic@beaconenviro.com> Sent: Wednesday, July 17, 2019 11:40 AM To: Marshall, Brooke <Brooke.Marshall@halton.ca>; 'Minaji, Rosalind' <Rosalind.Minaji@burlington.ca>; Clark, Richard <Richard.Clark@halton.ca>; Houlios, Andreas <Andreas.Houlios@burlington.ca>; McCabe, Owen <Owen.McCabe@halton.ca> Cc: Huycke, Adam <Adam.Huycke@halton.ca>; Ireland, Heather <Heather.Ireland@halton.ca>; 'Emma DeFields' <edefields@hrca.on.ca>; Sarah Matchett (smatchett@hrca.on.ca) <smatchett@hrca.on.ca>; Lesley Matich (lmatic@hrca.on.ca) <lmatic@hrca.on.ca>; Malik, Umar <Umar.Malik@burlington.ca>; 'jennifer@jplanning.ca' (jennifer@jplanning.ca) <jennifer@jplanning.ca>; 'tperruzza@firsturban.ca' <tperruzza@firsturban.ca>; 'kevin@argoland.com' <kevin@argoland.com>; ITang@blg.com Subject: RE: Evergreen - Natural Heritage System Buffers</p> <p>Welcome aboard Andreas and Owen, and all the best to Brooke and Lola!</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Richard - Thank-you for the comments and the quick review, and for continuing to work with us on a collaborative basis.</p> <p>All - please find attached a finalized buffer memo (both in track changes and a “clean” version for your records) that addresses the five comments provided by the Region.</p> <p>Please note that the first four points have been addressed by incorporating the Region’s suggested text edits into the memo. The fifth point requires a bit of technical clarification, provided below.</p> <ul style="list-style-type: none"> • ELC Unit 7d was included in error in the original table and was removed as a correction. As per the 2018 TDSPSSU, ELC unit 7d does not qualify as Significant Woodland (see p. 123: “<i>Notably, cultural woodland ELC Unit 7d ... does not appear to have high enough tree densities to qualify as woodland under the Regional definition. This assessment is consistent with the findings of the 2009 TDSPSS which qualified the unit as a savannah</i>”). • Therefore Table 1 in the memo retains the reference to ELC unit 7f but also adds immediately adjacent ELC unit 8b – which is also part of the Significant Woodland - for completeness and clarity. <p>We look forward to continuing to work with the group to advance this file.</p> <p>Sincerely, Margot</p> <p><i>Margot Ursic, M.Sc. / Senior Planning Ecologist</i> BEACON ENVIRONMENTAL 373 Woolwich Street, Guelph, ON N1H 3W4 T) 519.826.0419 x21 F) 905.201.0639 C) 519.803.8101 www.beaconenviro.com</p> <p>From: Margot Ursic, Beacon Environmental Ltd. Date: July 17, 2019 Ref: BEL 212113 Re: Final Summary of Agreed to Buffer Refinement Approach for the Evergreen Community Environmental Implementation Report (EIR)</p> <p>As you are aware, the Tremaine Dundas Secondary Plan Subwatershed Study Update (TDSPSSU) (May 2018) was finalized and approved by the City of Burlington, Region of Halton and Conservation Halton (CH) in the summer of 2018, and the updated Secondary Plan was approved by the Region in May 2019. Therefore, the Evergreen Study Team1 is now seeking to move forward with re-submission of an updated Environmental Implementation Report (EIR) and Functional Servicing Study (FSS) in accordance with the EIR-FSS Terms of Reference developed for the TDSPSSU.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>As you are also aware, in January of 2019 the Study Team met with the agencies to seek agreement regarding specific buffer widths beyond the potential ranges already provided as part of comments from the Region and CH on the draft TDSPSSU. It was understood that firm agreement on specific buffer widths to every Key Feature would not be possible prior to review of the updated EIR-FSS. However, the Study Team sought to confirm agreement on: (a) the principles being put forward as a basis for the proposed refinements, and (b) buffers recommended to be used as the basis for moving forward with the EIR-FSS and the Draft Plan.</p> <p>Discussions over the winter of 2019 were very constructive and resulted in agreement being reached on most points related to the determination of buffers in the TDSPSS Area, with only a few relatively minor points remaining to be resolved. The purpose of this memo is to summarize what has been agreed to date and to outline the few outstanding points of disagreement. Some of these points have no real bearing on the Evergreen Community EIR-FSS and are only being noted as a matter of record. The remaining outstanding points are expected to be addressed in further consultation with the agencies through the EIR-FSS review and approval process with consideration for the additional details provided through that process.</p> <p>This memo has finalized based on the incorporation of four minor points of clarification, as per the comments provided by the Region (R. Clark) via e-mail on July 17, 2019.</p> <p><u>Site-specific Context</u></p> <p>The Region's <i>Framework for Regional Natural Heritage System Buffer Width Refinements for Area-Specific Planning</i> (2017, v.1) (herein referred to as the Framework) requires consideration of the individual vegetation communities mapped using the Ecological Land Classification (ELC) system that make up the Bronte Creek valleylands, Central Woodland and Southern Woodland. However, in the Study Team's opinion the composition, context and sensitivities of the overall features in the landscape should also be considered in the buffer determination process.</p> <p>There are three distinct wooded ecological feature areas in the TDSPSS Area that need to be considered in relation to buffers: the Bronte Creek valley (including significant woodlands and IO Pond with associated wetlands), the Central Woodland (including some small wetland features within it) and the Southern Woodland. In general, from an ecological perspective and based on the available data collected (as documented in the 2018 TDSPSSU), the Study Team considers the Bronte Creek valley to be the most sensitive to land use changes in the adjacent lands and the Southern Woodland to be the least sensitive. The relative sensitivity of these three wooded areas in relation to each other is described in further detail below.</p> <ul style="list-style-type: none"> The Bronte Creek valleylands and their associated significant woodlands and significant wetlands are generally considered be the features most sensitive and most in need of protection and mitigation measures (including buffers and setbacks) to ensure that the ecological functions currently supported by these areas are sustained and, where possible, enhanced. Key sensitivities include the presence of: several area-sensitive breeding bird species, a few regionally rare plant species, steep slopes in some locations associated with the creek and its tributary, a pond and associated wetlands, and provision of several types of significant wildlife habitat (SWH) including habitat for some species of turtles and frogs. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<ul style="list-style-type: none"> • The Central Woodland is a sizeable, mature woodland dominated by native species that supports several ecological functions and some small wetland / drainage features. It would also benefit from some buffers (and other mitigation measures) to sustain and enhance these functions. However, relative to the valley, this feature is a secondary habitat for area-sensitive and forest breeding birds, and while it contains many mature native trees it does not support the same range of habitats or significant wildlife habitat (SWH) that are supported by the valley. • Of the three wooded areas, the Southern Woodland, which is partially on a fill pile and has regenerated from a former nut tree and apple plantation, is considered the least sensitive to urban development. It does not support any attributes that would enhance its sensitivity, and therefore buffers to this feature should be largely focussed on what is required for tree and woodland dripline protection. <p>Additional work to characterize the sensitivity of these features is required (as per the 2018 TDSPSSU EIR-FSS Terms of Reference) and is to be provided to verify these descriptions as part of the EIR-FSS.</p> <p>Two small watercourse/wetland features at the northeastern and southeastern corners of the Evergreen lands are tributaries to the off-site Fourteen Mile Creek and Redside Dace contributing habitat. These features (like all confirmed habitat of Provincially Endangered and Threatened species) are regulated by the Ministry of Environment Conservation and Parks (MECP) They are also regulated by CH and therefore the ultimate buffers and setbacks need to be determined in consultation with those agencies and in accordance with the applicable regulations. Therefore, buffer recommendations for these features are not provided in this memo.</p> <p><u>Previously Agreed to Points Regarding Buffers at the Subwatershed Study Stage</u></p> <p>The topic of buffers was discussed at length as part of the TDSPSSU approval process. Through this process it was agreed that:</p> <ul style="list-style-type: none"> • precautionary 30 m buffers would be applied to all Key Features in the TDSPSSU (and Secondary Plan) except for the IO Pond wetlands where 30 m buffers are required, and except for the wetland at the southwest corner of Highway 407 and Tremaine Road where a 15 m buffer would be applied as per the previous subwatershed study and Ontario Municipal Board (OMB) agreement; • the buffer refinement process would be deferred to the EIR stage; • the Region's Buffer Refinement Framework (v.1 February 2017, as may be amended) (referred to as the "Framework" herein) would be the foundation for future buffer width refinement assessments, and the risk-based approach and steps described therein would be followed; and • should buffer refinements for the wetlands in the Central Woodland be proposed at the EIR stage, then further evaluation of the status of these wetlands would be warranted. <p>In addition, through the TDSPSSU approval process, agreement was reached on several clarifications and modifications to the Framework (as per the email from R. Clark on August 30, 2017), as follows:</p> <ul style="list-style-type: none"> • trails may be located within buffers or treated as adjacent land uses; • linkages in and of themselves do not require buffers; • meadows that are not Key Features do not require buffers; • the western edge of the Central Woodland can be treated as a Cultural Woodland for the purposes of applying the Framework; • an "environmentally sensitive road" may be assigned a moderate risk or low risk land use ranking in the Framework; and, 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<ul style="list-style-type: none"> • Butternut (a Provincially Endangered tree species) can be exempt from counting as an attribute that increases feature sensitivity in the Framework. <p>It is also understood that neither the Region nor CH are supportive of stormwater management (SWM) ponds or Low Impact Development (LID) structures that require maintenance within buffers, but that they would accept the inclusion of naturalized swales that convey water within buffers as long as these swales do not include underdrains/pipes/other infrastructure that would require future maintenance.</p> <p><u>Additional Agreed to Points Regarding Buffers at the Site-specific Study Stage</u></p> <p>In April of 2018, the Region further advised that they were willing to consider potential additional clarifications and/or modifications to the Framework at the EIR stage if deemed appropriate and consistent with the relevant policies of the Province, Region, City and CH. Based on this direction, the Evergreen Study Team engaged in further discussions with the Region, City and CH regarding buffers between November 2018 and January 2019. This dialogue was very constructive and general agreement was reached regarding an approach for applying the Region's Framework at the EIR stage for the majority of the Evergreen lands.</p> <p>As noted above, it was agreed through the 2018 TDSPSSU approval process that the Region's Framework be used as the basis for the buffer refinement process². In addition to the points already agreed to (listed above), the Study Team identified seven additional points of clarification and/or modifications to the Framework for consideration at the EIR stage by the Region and CH. The Study Team's understanding of what has been agreed to in relation to these seven points is summarized below.</p> <ol style="list-style-type: none"> 1. APPLICATION OF THE MITIGATING FACTORS REFINEMENT: The Framework currently allows for a 5 metre (m) buffer reduction as part of Step 2 in the refinement process where mitigating factors (such as fencing at the outer boundary of the buffer and/or enhancement native species plantings within the buffer) are to be applied. At the subwatershed study stage, the Region required an upper buffer range limit of 30 m on Key Features. However, at the EIR stage it was agreed that if mitigating factors are being implemented, then the 5 m buffer reduction from Step 2 of the Framework should apply where it can be justified from a scientific and/or regulatory perspective. <p>It is understood by the Study Team that the Step 2 mitigating factors reduction of 5 m would be applicable where there is a fence and/or buffer enhancement planting. Although both mitigating factors are to be implemented together in most areas, there are locations where it will not be feasible or desirable to apply both. For example, lands owned by Infrastructure Ontario (that will in time become part of Bronte Creek Provincial Park) adjacent to lots identified for residential use will have a fence at the rear lot line and the Provincial lands are expected to remain in an open, natural state, but cannot be enhanced as part of the EIRFSS process³. Another example is the linkage between the Central Woodland and Bronte Valley which contains a proposed road. While the buffers between the features and the road are to be naturalized, continuous fencing within the linkage area along the woodland and wetland buffer limits will impede the movement of wildlife and therefore careful consideration of how much, if any, and what type of fencing is appropriate in this area will be required.</p> <ol style="list-style-type: none"> 2. APPLICATION OF THE MITIGATING FACTORS REFINEMENT TO "TOO HIGH" RISK SIGNIFICANT WOODLANDS: The Framework (p. 19) states that in cases where the Key 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<p>Feature's uncertainty ranking is "too high" the 5 m buffer reduction available in Step 2 where mitigating factors are being implemented (as described in point 1 above) "may not be available" and the Figure 8 flow chart (p. 22) suggests that this reduction would not be available in any cases. However, the Region has clarified that where the uncertainty ranking is "too high" it is not necessary to preclude the Step 2 width refinement where it can be justified from a scientific and/or regulatory perspective.</p> <p>It has been further agreed that where applicable regulations do not preclude it, scientific considerations should include maintenance of wetland hydrology and catchment area, and protection of critical function zones.</p> <p>The Region and CH have further suggested that tree fall zones be included in the justification for appropriate buffer widths however, the Study Team does not agree. Further justification will be provided in the EIR-FSS.</p> <p>3. REDUCED SENSITIVITY RANKINGS FOR H5 AND ELC UNIT 15a (west side): In the TDSPSSU, the hedgerow that runs along and is contiguous with the western side of the Central Woodland (ELC unit 15a, refer to Figure 3.1.1B in the 2018 TDSPSSU) is considered part of the immediately adjacent significant woodland. However, as noted in the introductory text to this memo, for the purposes of the buffer refinement process the agencies have agreed to recognize the hedgerow on the western edge of the Central Woodland as a "cultural woodland" because it has been disturbed by agricultural uses over many decades, has a farm lane running through it, and effectively provides some buffering functions to the broader woodland in and of itself.</p> <p>Like the west side of ELC unit 15a, hedgerow H5 abutting the narrow Green Ash woodland (unit 9a) has been included as part of the broader significant woodland, has also been disturbed by decades of agricultural activities, and in and of itself provides a buffer to the wetland and woodland areas south of it. It has been agreed that both hedgerow H5 and the west side of ELC unit 15a can be treated as "cultural woodlands" for the purposes of the buffer refinement process.</p> <p>Currently, the Region's Framework weights the feature sensitivity and the adjacent land uses scores equally. Although the Study Team's opinion is that this is not appropriate in all cases (particularly where the feature sensitivity is "low" or "moderate"), it is understood that the Region and CH are not supportive of a modified approach to the Framework in this regard.</p> <p>The Study Team has also suggested that there should be some differentiation between wooded ELC units that support multiple wildlife habitat functions that confer sensitivities (e.g., as listed in the Framework Table B-1) and units that support few wildlife habitat functions with limited sensitivities. The Region and CH agree with this approach and have specifically agreed that reducing the feature sensitivity of H5 and the western portion of ELC unit 15 from "high" to "moderate" would be acceptable if the EIR-FSS demonstrates limited sensitivity with respect to wildlife habitat functions.</p> <p>4. REDUCED SENSITIVITY FOR ELC UNITS 6 AND 8a: Similar to H5 and the western side of ELC unit 15 (as discussed in point 3 above), cultural woodland ELC units in the Central Woodland (ELC units 6 and 8a, refer to Figure 3.1.1B in the TDSPSSU), based on the best available information, support few wildlife habitat functions that confer additional sensitivity on these units.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<p>As per point 3 above, the Region and CH have agreed that the feature sensitivity of cultural ELC units 6 and 8a could be reduced from “high” to “moderate” if the EIR-FSS demonstrates limited sensitivity with respect to wildlife habitat functions.</p> <p>5. ADDITIONAL BUFFER REDUCTION FOR SWM PONDS AS THE ADJACENT LAND USE: It was generally agreed by the Region and CH that stormwater management (SWM) ponds adjacent to natural areas can provide a naturalized setback from development, which can perform many of the functions of a buffer.</p> <p>In the case of the proposed SWM Pond 4 north of the IO Pond (refer to Figure 4.2.4 in the TDSPSSU provided as Attachment 3), the pond would be abutting significant woodlands to the west and south, with the significant woodland to the south being unit H5 discussed above. The SWM pond is to be a naturalized design and, as discussed with the agencies in January 2019, it appears to be feasible to keep maintenance access and activities outside of the zone between the SWM pond open water and the woodland buffer. Given this context, a buffer between the wooded feature dripline and the naturalized SWM pond edge of 20 to 30 m is considered excessive and unnecessary by the Study Team outside of the Greenbelt.</p> <p>It has been agreed by the Region and CH that an additional buffer width reduction of 5 to 10 m where SWM Pond is the adjacent land use (on top of the 5 m reduction already supported by the Framework at Step 2) could be supported if: (a) the SWM pond is designed as a naturalized feature with lands along the environmentally sensitive perimeter of the pond in naturally self-sustaining vegetation, (b) access and maintenance activities are kept outside of the sensitive area between the Key Feature and the SWM pond, (c) if the proposed design is acceptable to the City, and (d) the buffer width in this location is not reduced below 10 m.</p> <p>6. ADDITIONAL BUFFER REDUCTION FOR OPEN SPACE AS THE ADJACENT LAND USE: The Study Team suggested that, like naturalized SWM ponds, Open Space lands uses can potentially provide a setback between protected Key Features and other more intensive adjacent land uses that effectively acts like a buffer. The Open Space lands between the significant woodland and the proposed residential land uses are owned by Infrastructure Ontario but are expected to be left open and will naturalize or may be enhanced when the lands come into Ontario Parks ownership.</p> <p>It has been agreed by the Region and CH that an additional Step 2 buffer width reduction of 5 to 10 m where Open Space is the adjacent land use (on top of the 5 m reduction already supported by the Framework at Step 2) could be supported if: (a) the buffer is naturalized and (b) the overall width of buffer and Open Space Block is sufficient to demonstrate normal buffer functions to the next closest land use will be maintained.</p> <p>However, the Region and CH indicated during discussions that because the Open Space between the significant woodland and the proposed residential land use narrows towards its southern limit, the significant woodland should be considered as the adjacent land use to ensure an appropriate buffer is applied.</p> <p>It was agreed that the Study Team would review their analysis using the significant woodland as the adjacent land use. It was further agreed that a minor reduction to Framework-derived buffers for a few lots might be considered if an acceptable buffer width to the significant woodland was</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<p>being maintained for the majority of the significant woodland / Open Space / residential land use interface and if all other buffer issues on the Evergreen lands were resolved to the Region's satisfaction.</p> <p>7. REDUCED SENSITIVITY RANKING FOR THE SOUTHERN WOODLAND (ELC UNIT 7a): The Study Team has suggested that because the Southern Woodland (ELC unit 7a) is a single ELC unit classified as a cultural woodland with no or few Table B1 functions that it is not appropriate for it to have a "high" overall uncertainty rank. However, under the Framework, significant woodland comprised of one or more cultural woodland communities without any Table B-1 functions as "moderate" sensitivity ranking, and when located adjacent to a "high" risk land use (such as residential) results in a "high" overall uncertainty ranking (and a 25 m buffer). In this case, the Region and CH are requiring additional information to be presented in the EIR-FSS regarding the nature and extent of feature sensitivities before considering a change in feature sensitivity or uncertainty ranking that would result in a buffer less than 25 m, even though they support a buffer as low as 15 m to the same feature where a "low" risk adjacent land use (such as a single-loaded road) is the adjacent land use. The Study Team disagrees that a 25 m buffer is required between the residential lands and the Southern Woodland dripline and plans to explore other options through the EIR-FSS to achieve a mutually satisfactory solution.</p> <p><u>Summary of the Agreed to Points</u></p> <ul style="list-style-type: none"> • A 5 m buffer reduction related to enhancement plantings and/or fencing can be applied to Key Features and watercourses as part of Step 2: <ul style="list-style-type: none"> ○ as long as at least one recognized mitigation measure is implemented that enhances the buffer function; ○ unless this reduction is in contravention of an applicable regulation (e.g., CH requires 30 m buffers to all wetlands that are identified by the Ministry of Natural Resources and Forestry (MNR) as Provincially significant or are greater than 2 ha). • A 5 m buffer reduction related to enhancement plantings and/or fencing can be applied to Key Features and watercourses with an uncertainty ranking of "too high" as long as scientific justification related to maintenance of wetland hydrology and catchment area, and the protection of critical function zones is provided. • A "moderate" feature sensitivity ranking in Step 1.2 can be applied to the western portion of ELC unit 15a in the Central Woodland, H5 at the northern limit of the IO pond wetlands, and cultural ELC units 6 and 8a in the Central Woodland as long as the EIR-FSS is able to demonstrate the limited sensitivity of these units with respect to wildlife habitat functions. • CH agreed to grading within outer portion of a significant wetland buffer (e.g., to introduce a vegetated swale) if the EIR-FSS demonstrates no negative impacts. • An additional Step 2 buffer width reduction of 5 to 10 m can be applied where a SWM Pond is the adjacent land use in cases where: (a) the SWM pond will be designed as a naturalized feature, (b) access and maintenance activities will be kept outside of the interface between the Key Feature and the SWM pond, (c) the proposed design will be acceptable to the City, and (d) the buffer width in this location will not be reduced below 10 m. • Scenarios with Open Space as the adjacent land use are not really relevant in the context of the TDSPSS Area because it is the distance from the significant woodland, not the intervening Open 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<p>Space, which is the appropriate consideration. However, a minor reduction to Framework-derived buffers for a few lots might be considered if an acceptable buffer width is maintained for the majority of the significant woodland / Open Space / residential land use interface.</p> <ul style="list-style-type: none"> No reductions to the 25 m buffer to the Southern Woodland where residential land uses abut the feature are acceptable to the Region or CH at this time. However, if the EIR-FSS is able to demonstrate the limited sensitivity of this unit with respect to wildlife habitat functions, a reduction will be considered. <p><u>Application of the Agreed to Points in the Region's Framework</u></p> <p>Table 1 illustrates how the various points of agreement are applied to the relevant adjacent land use / feature (ELC units) combinations anticipated in the study area (refer to Figure 3.1.1B and Figure 4.2.4 in the 2018 TDSPSSU). Table 1 follows the steps and risk-based approach delineated in the Region's Framework, as agreed. Table 1 also provides the specific buffer widths or ranges agreed to by the Region and CH with notations of:</p> <ul style="list-style-type: none"> the supporting information required to justify the agreed to buffer or range, as agreed above; deferral to the MECP for final buffer determinations, where appropriate, as agreed; and the few areas where agreement has not been reached that will be addressed further by the Evergreen Study Team through the EIR-FSS review and approval process. <p>The summary presented in Table 1 include consideration for the Study Team's knowledge of (a) the TDSPSS Area and (b) what is being proposed through the Draft Plan. These details are to be presented in the EIR-FSS.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


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		<div style="text-align: center;">  <p>Summary of Agreed to Buffer Refinement Approach for the Evergreen Community EIR (July 17, 2019)</p> <p>Table 1. Summary of buffer width analyses and buffer widths / width ranges for Key Features and watercourses in the TDSPSS area supported by the Region and Conservation Halton (February 2019) at the site-specific stage.</p> <table border="1" data-bbox="668 423 1942 1058"> <thead> <tr> <th>Regional Buffer Framework (v1)</th> <th colspan="4">STEP 1: Risk Factors</th> <th>Step 2: Mitigation</th> <th>Step 3: Uses Within Buffer</th> <th></th> <th>Comments (outstanding points of disagreement highlighted in grey)</th> </tr> <tr> <th>FEATURE (ELC Unit(s))</th> <th>STEP 1.1 Adjacent Land Use Risk Score</th> <th>STEP 1.2 Feature / Sensitivity Risk Score</th> <th>STEP 1.3 Uncertainty Rank</th> <th>STEP 1.4 Step 1 Buffer Refinement Range</th> <th>STEP 2 Mitigating Factors Assessment</th> <th>STEP 3 Assessment of Potential Permitted Uses</th> <th>SUPPORTED BY THE AGENCIES FOR THE EIR</th> <th></th> </tr> </thead> <tbody> <tr> <td colspan="9">14W-17 WETLAND AND WATERCOURSE</td> </tr> <tr> <td>14W-17 Wetland (ELC Unit 24c)</td> <td>H (Future Transitway)</td> <td>H (Significant Wetland)</td> <td>Too High</td> <td>None</td> <td>None</td> <td>None anticipated</td> <td>15 - 30 m TBC by MECP and CH</td> <td rowspan="2">A 15 m buffer to ELC unit 24c was agreed to by the Region (as part of the OMB process and as shown in the 2018 TDSPSSU) subject to approval by CH and MECP through the EIR. 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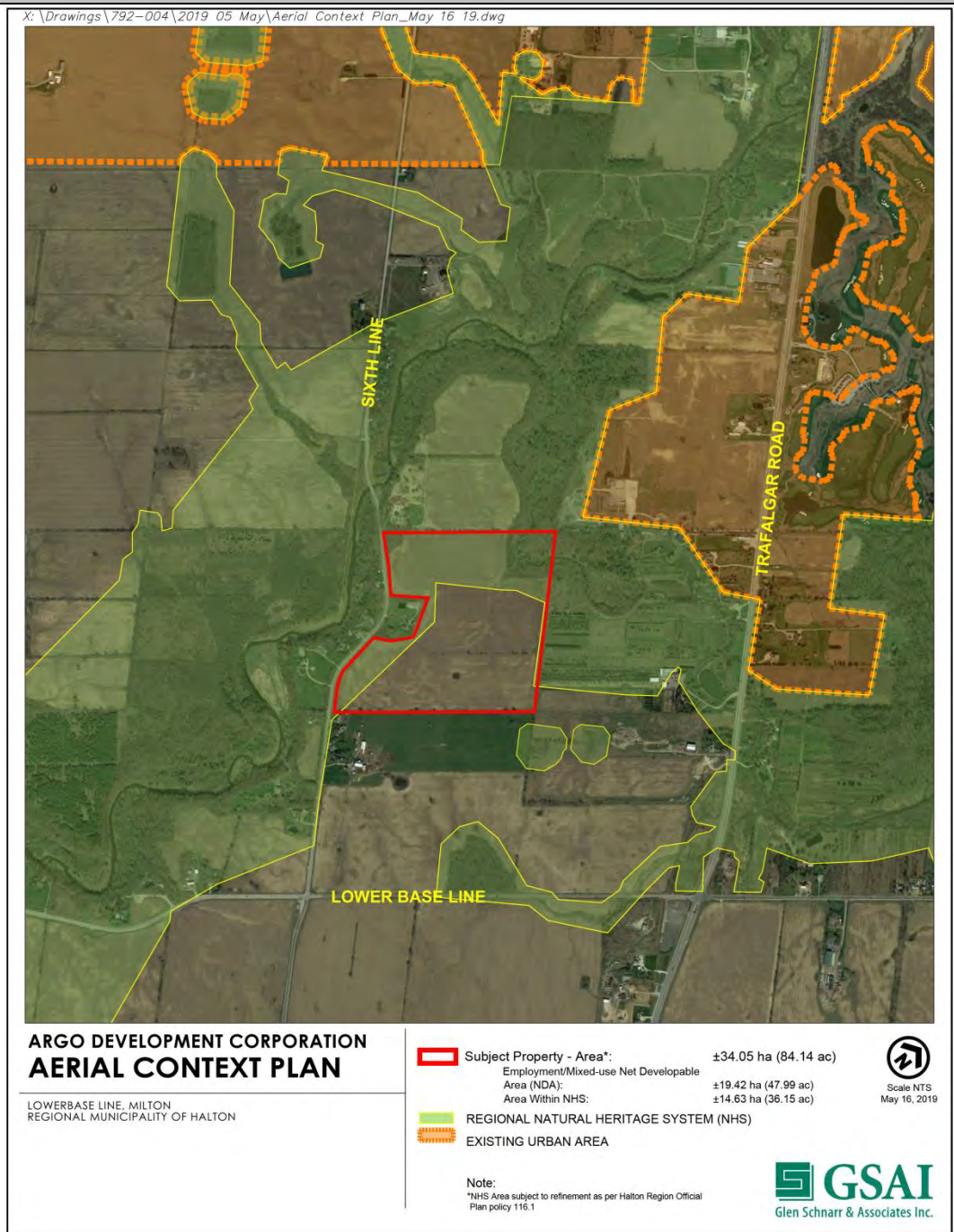
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14W-17Cb Wetland (ELC Unit 24a)	M (Mixed Use - Employment)	M (Regionally Significant)	Moderate	-(0 – 5 m)	None	None anticipated	TBD by MECP and CH																																																																																			

No.	Source	Submission	Response																																				
		<p style="text-align: center;">  Summary of Agreed to Buffer Refinement Approach for the Evergreen Community EIR (July 17, 2019) </p> <table border="1" data-bbox="671 332 1945 600"> <thead> <tr> <th>Regional Buffer Framework (v1)</th> <th colspan="4">STEP 1: Risk Factors</th> <th>Step 2: Mitigation</th> <th>Step 3: Uses Within Buffer</th> <th></th> <th>Comments (outstanding points of disagreement highlighted in grey)</th> </tr> <tr> <th>FEATURE (ELC Unit(s))</th> <th>STEP 1.1 Adjacent Land Use Risk Score</th> <th>STEP 1.2 Feature / Sensitivity Risk Score</th> <th>STEP 1.3 Uncertainty Rank</th> <th>STEP 1.4 Step 1 Buffer Refinement Range</th> <th>STEP 2 Mitigating Factors Assessment</th> <th>STEP 3 Assessment of Potential Permitted Uses</th> <th>SUPPORTED BY THE AGENCIES FOR THE EIR</th> <th></th> </tr> </thead> <tbody> <tr> <td>14W-17Cb Wetland (ELC Unit 24a)</td> <td>H (Mixed Use - General)</td> <td>M (Regionally Significant)</td> <td>High</td> <td>None</td> <td>None</td> <td>None anticipated</td> <td>TBD by MECP and CH</td> <td></td> </tr> <tr> <td>14W-17Cb Wetland (ELC Unit 24a)</td> <td>L (Pedestrian Trail)</td> <td>M (Regionally Significant)</td> <td>Low</td> <td>-(5 - 10 m)</td> <td>None</td> <td>None anticipated</td> <td>30 m^c</td> <td></td> </tr> </tbody> </table> <p style="font-size: small; margin-top: 10px;"> ^c As agreed with the Region and CH, a "moderate" or "low" sensitivity score can be applied to a single-loaded road whose design is environmentally sensitive. It is anticipated that all feasible environmentally sensitive design measures will be incorporated into roads adjacent to features on the subject property (e.g., directional lighting away from the feature, some type of fencing or barrier to discourage encroachment, no infrastructure such as bus stops along the side of the ROW adjacent to the feature, etc.) and therefore a "low" risk score has been assigned to these land uses. </p> <p style="text-align: right; font-size: x-small; margin-top: 20px;">Page 15</p>	Regional Buffer Framework (v1)	STEP 1: Risk Factors				Step 2: Mitigation	Step 3: Uses Within Buffer		Comments (outstanding points of disagreement highlighted in grey)	FEATURE (ELC Unit(s))	STEP 1.1 Adjacent Land Use Risk Score	STEP 1.2 Feature / Sensitivity Risk Score	STEP 1.3 Uncertainty Rank	STEP 1.4 Step 1 Buffer Refinement Range	STEP 2 Mitigating Factors Assessment	STEP 3 Assessment of Potential Permitted Uses	SUPPORTED BY THE AGENCIES FOR THE EIR		14W-17Cb Wetland (ELC Unit 24a)	H (Mixed Use - General)	M (Regionally Significant)	High	None	None	None anticipated	TBD by MECP and CH		14W-17Cb Wetland (ELC Unit 24a)	L (Pedestrian Trail)	M (Regionally Significant)	Low	-(5 - 10 m)	None	None anticipated	30 m ^c		<p>Comments are acknowledged. Please see above for a detailed response.</p>
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28.	Argo	<p>Attached per email dated 2020-10-30 (Glen Schnarr & Associates Inc.)</p> <p>Re: Region of Halton – Municipal Comprehensive Review Regional Official Plan Review Discussion Papers Formal Response from Argo Development Corporation</p> <p>Glen Schnarr & Associates Inc. (GSAI) represents Argo Development Corporation, owner of approximately 34 hectares (84 acres) of land in the Town of Milton, just outside of the existing Milton Urban Area (see <i>Aerial Context Plan</i> enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are within Provincially Significant Employment Zone 18 (Halton, Peel). In the Regional Urban Structure Discussion Paper and more notably on <i>Figure 30 – Potential Locations for new Employment Area DGA</i>, we note that our client's above-noted lands are located within "Remaining Future Strategic Employment Areas".</p> <p>We have reviewed the Region's Discussion Papers, released June 2020, covering the topics of Regional Urban Structure, Climate Change, Natural Heritage and Rural and Agricultural System and we have provided responses in a separate Response Matrix, addressing the Discussion Paper Questions (appended). The key points from the Response Matrix that we wish to highlight include the following:</p>	<p>Rural and Agriculture</p> <p>Comments supporting a mutually exclusive Prime Agricultural Area land use designation is reflected in RAS-1. While a preference was indicated for Mapping Option 1 identified in the Discussion Papers, RAS-1 will see three new mutually exclusive land use designations in the rural area which would include Prime Agricultural Areas, Rural Lands and Key Features. Collectively Prime Agricultural Lands and Rural Lands would make up the Agricultural System. Support for agriculture-related uses is reflected in RAS-2 and the Region acknowledges the comments that case-by-case analysis is warranted. Comments also are in alignment with RAS-2 and on-farm diversified uses. Comments regarding size criteria being left to the local municipalities to respond to the local context are received. Further discussion regarding agriculture-related and on-farm diversified uses will be taking place during Phase 3 of the ROPR and reflected in policy development. Updates to AIA's are reflected in RAS-4 although it was identified that AIA policies currently in the ROP adequately protect agriculture. While it was suggested that requirements for renewable energy projects set out in Provincial Policy may not need to be duplicated, there is Guidance regarding renewable energy projects identified in the Guideline on Permitted Uses in Ontario's Prime Agricultural Areas. The comments related to allowing special needs in the rural area are in alignment and reflected in RAS-5. Agricultural viability</p>																																				

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required; • The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion; • Lands within Provincially Significant Employment Zones and within the Region's Future Strategic Employment Areas should be prioritized to be added to the urban area for employment purposes; • ROP policies for employment lands should permit a broad range of uses to promote complete communities; • Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities; • The Region should explore Designated Greenfield Area density target of 50 residents and jobs per hectare. Deviation from this housing mix would require justification. This permits a wide range in choice of housing types; • The Region should assess the true costs of intensification on existing municipal and community services such as water and sanitary sewer infrastructure, parks and schools. • The Region has not fully evaluated the tolerance level of existing residents in embracing the amount of intensification that Regional staff are contemplating that goes beyond the Provincial minimum threshold. There are costs to both existing and future residents that need to be considered when contemplating intensification; • Forthcoming revisions to Land Needs Assessment Methodology should be considered within the context of Regional Urban Structure Discussion Paper. The revised LNAM could affect the original findings of the Discussion Paper; • The best approach at incorporating the Growth Plan Natural Heritage System is as an overlay rather than a designation. Furthermore, mapping needs to appreciate the policy differences between the Regional Natural Heritage, Greenbelt NHS and Growth Plan NHS, in accordance with Provincial Policy. NHS in settlement areas should be excluded; • ROP policies need to acknowledge that there is insufficient, current information available at the Regional-scale to make final decisions on natural boundaries, features and buffers. Decisions need to be made based on a science-based case-by-case analysis. The ultimate Regional Natural Heritage System should be sustainable, based on ground-truthing and completed environmental studies and research; and, • The Region should focus on programs over policies in curving climate change. The Region has not weighed the benefits to setting programs over policies in curving climate change. There is insufficient rationale/justification from Regional staff that ROP policy is the way to go in dealing with climate change. The Region should explore all climate change solutions equally. <p>Please see appended Comment Matrix prepared by Glen Schnarr & Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities north of Britannia Road in Milton. The lands are physically suitable and conveniently located close to existing and planned 400 series highways and our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas and the Region's identified potential locations for urban area expansion for employment uses. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and contribute to the development of complete and walkable communities. We request that you</p>	<p>continues to be an important issue and there are opportunities outside of the Official Plan to provide support and encourage farm diversification.</p> <p>Climate Change</p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p> <p>This is how Halton Region intends to respond to climate change with varying solutions equally.</p> <p>Natural Heritage</p> <p>Please refer to comments in No. 28.</p>

No.	Source	Submission	Response
		<p>consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly, GLEN SCHNARR & ASSOCIATES INC. Colin Chung, MCIP, RPP Partner</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
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Comments are acknowledged. Please see above for a detailed response.

**Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020**

Regional Urban Structure – Technical Questions

9 Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?

No.	Source	Submission	Response
		<p>We concur with the Town of Milton's comments. Locational context is key in identifying strategic locations for employment areas and should be considered. The Region should consider including a policy that sets out criteria for where the local municipalities can decide on employment conversions and those that require Regional approval, since some conversion requests may have Regional implications. As such, the Region should not be the approval authority for all employment conversions.</p> <p>10 Are there any areas within Halton Region that should be considered as a candidate for addition to an Employment Area in the Regional Official Plan?</p> <p>We concur with the Town of Milton's comments that Employment Areas previously identified by the Town should be included into the Settlement Area boundary. Furthermore, as stated by Town of Milton staff in Staff Report PD-011-19, all whitebelt lands identified by the Town should be added to the Settlement Area Boundary.</p> <p>Furthermore, lands within Provincially Significant Employment Zones and within the Region's Future Strategic Employment Areas should be prioritized to be added to the urban area for employment purposes.</p> <p>11 How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p> <p>We concur with the Town of Milton, in that employment planning should be located close to populations. A mix of uses should be encouraged to promote complete communities.</p> <p>Detailed economic planning should be determined at the local level, rather than the Regional level.</p> <p>12 What type of direction should the Regional Official Plan provide regarding planning for uses that are ancillary to or supportive of the primary employment uses in employment areas? Is there a need to provide different policy direction or approaches in different Employment Areas, based on the existing or planned employment context?</p> <p>We concur with the Town of Milton's comments that this should be specified in policies at the local municipal planning level. Any policies for employment lands should permit a broad range of uses to promote complete communities.</p> <p>As noted in the Urban Structure Discussion Paper (June 2020) it is recognized that there are a number of other uses that may be appropriate within Employment Areas due to their character, ancillary nature, or the function they serve by providing support to the primary uses within an Employment Area. As the Region has stated, it is important that Employment Areas can provide an appropriate mix of amenities and open spaces to serve those who work in the area. It is also noted by the Region that it is important that the ROP enables appropriate opportunities for a fully-diversified economic base, maintaining a range and choice of suitable sites for employment uses and complementary/supportive uses that take into account the needs of existing and future businesses. The ROP currently provides limited policy direction on how ancillary and/or complementary/supportive uses should be planned for within Employment Areas. This MCR is an opportunity to review and refine this policy direction through the current ROP Review. We support the policy approach of a broad interpretation of complementary/supportive uses in Employment Areas in order to plan for complete, healthy, liveable and walkable communities.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>13 How can the Regional Official Plan support planning for employment on lands outside Employment Areas, and in particular, within Strategic Growth Areas and on lands that have been converted? What policies tools or approaches can assist with ensuring employment growth and economic activity continues to occur and be planned for within these areas?</p> <p>We agree with the Town of Milton that mixed use forms of development should be permitted and encouraged. The Region should be bold in allowing mixed use development in employment areas including limited residential. In order to embrace and support principles of complete communities, the Region should consider land use policies to truly support where people live, work and spend leisure time, in the same area.</p> <p>14 Are there other factors, besides those required by the Growth Plan, Regional Official Plan or Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential settlement area expansions?</p> <p>The Region should consider areas previously identified by the local area municipalities as priority areas for settlement area expansion areas, such as Town of Milton's Staff Report PD-011-19.</p> <p>Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities.</p> <p>15 What factors are important for the Region to consider in setting a minimum Designated Greenfield Area density target for Halton Region as whole, and for each of the Local Municipalities? Should the Region use a higher minimum Designated Greenfield Area density target than the 50 residents and jobs per hectare target in the Growth Plan?</p> <p>A deviation away from the splits identified in the Hemson work (i.e. more apartments) will be a deviation from market-based supply and would require significant justification, which we have not seen to date. We concur with the Town of Milton that the density target should not be arbitrarily increased without significant justification from both demographic and market perspectives. The Region should ensure there is a mix of housing and that the density can meet market-based supply, rather than policy-based objectives.</p> <p>Has the Region assessed the true costs of intensification on existing servicing and community services such as parks and schools? Has the Region assessed the tolerance level of existing residents in embracing intensification? These are costs to both existing and future residents that need to be considered when contemplating intensification.</p> <p>The minimum greenfield density should offer choices for a mix of housing types. This is a 30 year plan and as the world changes as we have just recently experienced with COVID-19, the ROP needs to be flexible to accommodate changing market conditions. We ask Regional staff the following questions:</p> <ul style="list-style-type: none"> - Why do Regional staff think that 50 people and jobs per hectare, that the Growth Plan established as a minimum, is not appropriate for Halton Region? - Why do Regional staff think 60+ people and jobs per hectare is better planning? - Has a sensitivity analysis been undertaken to justify a density greater than 50 persons & jobs/hectare and to determine if it will meet current and future market demand conditions over the next 30 years? 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>If higher density is preferred only to result in less urban land being required and to curb urban sprawl, this justification is policy-driven, is insufficient to warrant planning for communities and does not reflect market needs and demands. This planning tool should not be considered lightly and more analysis is needed to justify going beyond the Provincial minimums.</p> <p>16 Are there any additional considerations or trends that Halton Region should review in terms of the Regional Urban Structure component of the Regional Official Plan Review?</p> <p>It is our understanding that the Region will be updating their Land Needs Assessment as part of the next steps in the Official Plan Review. Ensuring that the information being fed into the LNA is accurate is critical.</p> <p>Regional Urban Structure – General Questions</p> <p>1 Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other potential strategic growth areas, should be the primary focus for new houses and apartments? Why</p> <p>The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.</p> <p>2 As the Region plans to accommodate new growth, should it focus on intensification of existing built up areas or on expansion into agricultural and natural areas? What is an appropriate balance?</p> <p>The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.</p> <p>5 How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p> <p>The Region could support economic activity by supporting local economic development initiatives. The Region should be bold in allowing mixed use development in employment areas including limited residential. In order to embrace and support principles of complete communities, the Region should consider land use policies to truly support where people live, work and spend leisure time, in the same area.</p> <p>6 Halton's Employment Areas are protected for employment uses such as manufacturing, warehousing, and offices. How should the Region balance protecting these Employment Areas with potential conversions to allow residential uses or a broader mix of uses?</p> <p>The Region should focus on high priority employment areas and leave the detailed land use planning to local municipalities. Some mature and older employment lands are not competitive in the market They are more adept to accommodating employment conversions and the Region should support that.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>As noted above, it is recognized that there are a number of other uses that may be appropriate within Employment Areas due to their character, ancillary nature, or the function they serve by providing support to the primary uses within an Employment Area. As the Region has stated, it is important that Employment Areas can provide an appropriate mix of amenities and open spaces to serve those who work in the area. It is also noted by the Region that it is important that the ROP enables appropriate opportunities for a fully-diversified economic base, maintaining a range and choice of suitable sites for employment uses and complementary/supportive uses that take into account the needs of existing and future businesses. The ROP currently provides limited policy direction on how ancillary and/or complementary/supportive uses should be planned for within Employment Areas. This MCR is an opportunity to review and refine this policy direction through the current ROP Review. We support the policy approach of a broad interpretation of complementary/supportive uses in Employment Areas in order to plan for complete, healthy, liveable and walkable communities.</p> <p>7 The introduction of new sensitive land uses within or adjacent to Employment Areas could disrupt employment lands being used for a full range of business and/or industrial purposes. Are there other land use compatibility considerations that are important when considering where employment conversions should take place to protect existing and planned industry?</p> <p>Issues of compatibility between employment lands and new sensitive land uses are already addressed in Provincial and Regional land use compatibility guidelines. Duplication could lead to confusion.</p> <p>8 Having appropriate separation distances between employment uses and sensitive land uses (residential, etc.) is important for ensuring land use compatibility. What should be considered when determining an appropriate separation distance?</p> <p>Issues of compatibility between employment lands and new sensitive land uses are already addressed in Provincial and Regional land use compatibility guidelines. Duplication could lead to confusion.</p> <p>Rural and Agricultural System - Technical Questions</p> <p>1 Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</p> <p>We concur with the Town of Milton comments that a separate and unique land use designation should be used for Prime Agricultural Areas, as required by Provincial policy and especially that a separate and unique Rural land use designation should be applied to non-prime agricultural areas for clarity, transparency, and ease of use.</p> <p>2 Are there any additional pros and cons that could be identified for any of the options?</p> <p>Please see response on preferred mapping option below.</p> <p>3 Do you have a preferred mapping option? If so, why?</p> <p>We believe that the mapping options presented are not clear and should not be treated as mutually exclusive options. We believe that the mapping should have prime agriculture as a designation (as required by Provincial policy) and that Natural Heritage System should be an overlay (similar to Mapping Option 1). However we also believe it is important to have a Rural Agriculture designation (as shown in Mapping Option 4), and not just designate all agricultural lands as "prime", regardless of soil quality/class.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>4 Should the ROP permit the agriculture-related uses as outlined in the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas in its entirety?</p> <p>We agree with the Town of Milton comments that all agriculture-related uses should be permitted in all prime agricultural areas. The PPS allows for broader uses in prime agricultural areas and the ROP should reflect this.</p> <p>5 What additional conditions or restrictions should be required for any agriculture- related uses?</p> <p>We agree with the Town of Milton comments that additional restrictions for agriculture related uses Region-wide would be inappropriate. Case-by- case analysis should be considered especially where farm building development and expansion is required to accommodate the agriculture related use.</p> <p>6 The Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas limit on-farm diversified uses to no more than 2 per cent of the farm property on which the uses are located to a maximum of 1 hectare. As well, the gross floor area of buildings used for on-farm diversified uses is limited (e.g., 20 per cent of the 2 per cent). Are these the appropriate size limitations for Halton farms?</p> <p>On-farm diversified uses should be broad and less restrictive to assist with the economics of the farm. We agree that the Region should defer to the local municipalities to identify size requirements.</p> <p>7 Should the Regional Official Plan permit on-farm diversified uses as outlined in the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas in its entirety?</p> <p>We agree with the Town of Milton comments, to permitting all on farm diversified uses in prime agricultural areas. We also concur that the list of permitted on-farm diversified uses is not exhaustive and policies should reflect that.</p> <p>8 What additional conditions or restrictions should be required for any on-farm diversified uses?</p> <p>We agree with the Town of Milton that further restrictions to on-farm diversified uses should be restricted to the local municipalities.</p> <p>10 Do the Agricultural Impact Assessment policy requirements in the ROP sufficiently protect agricultural operations in the Prime Agricultural Area and Rural Area? If not, what additional requirements do you think are needed?</p> <p>We agree with the Town of Milton that the current AIA polices in the ROP are sufficient.</p> <p>11 Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?</p> <p>We concur with the Town of Milton that requirements set out in Provincial Policy with respect to renewable energy projects, may not need to be duplicated in municipal policies.</p> <p>12 Should special needs housing be permitted outside of urban areas and under what conditions?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>We concur with the Town of Milton's comments, special needs housing should be expressly permitted in urban and rural areas.</p> <p>Rural and Agricultural System – General Questions</p> <p>1 Should Halton adopt a flexible approach in allowing agriculture-related uses and on-farm diversified use businesses in the agricultural area to support the economic vitality of farms and farmers?</p> <p>The Region should consider the needs of farm operations to protect farm viability, while balancing potential impacts on surrounding operations.</p> <p>Natural Heritage - Technical Questions</p> <p>1 As required by the Growth Plan, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan. Based on options outlined in the Natural Heritage Discussion paper, what is the best approach in incorporating the Natural Heritage System for the Growth Plan into the Regional Official Plan?</p> <p>In our opinion the best approach at incorporating the Growth Plan Natural Heritage System is as an overlay rather than a designation. Furthermore, mapping needs to appreciate the policy differences between the Regional Natural Heritage, Greenbelt NHS and Growth Plan NHS, in accordance with Provincial Policy. NHS in settlement areas should be excluded.</p> <p>ROP policies need to acknowledge that there is insufficient, current information available at the Regional-scale to make final decisions on boundaries, features and buffers. Decisions need to be made based on a science-based, case-by-case analysis. We believe that the ultimate Regional Natural Heritage System should be based on ground-truthing and completed environmental studies and research. RNHS policies should demonstrate some flexibility in being applied as part of a context-specific approach, avoiding a "one size fits all" framework.</p> <p>2 Regional Natural Heritage System policies were last updated through Regional Official Plan Amendment 38. Are the current goals and objectives for the Regional Natural Heritage System policies still relevant/appropriate? How the can Regional Official Plan be revised further to address these goals and objectives?</p> <p>NHS features should be delineated separate from linkages/buffers. It is not clear why the Region would consolidate centres for biodiversity, linkages, buffers, and enhancement areas into the overall RHS. Instead, perhaps the Region should establish a clear set of guidelines and criteria for when and how linkages, buffer widths and enhancement areas are needed and there perhaps separate guidelines/criteria for each of those elements.</p> <p>3 To ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?</p> <p>"Buffers" and "vegetation protection zone" should not be used interchangeably as they are differentiated in Provincial policy. The ROP should continue to separate and distinguish RNHS from VPZ of the Greenbelt and Growth Plan. We do not support consolidation as one RNHS, since VPZ has different</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>criteria for buffer requirements than the RNHS. Since Greenbelt overlaps with Prime Agricultural Areas, we would recommend that the Prime Agricultural Area be designated and the Greenbelt be an overlay.</p> <p>4 Given the policy direction provided by the Provincial Policy Statement and Provincial plans, how should policy and mapping address the relationship between natural heritage protection and agriculture outside of the Urban Area or the Natural Heritage System?</p> <p>We believe that a comprehensive approach is needed for significant woodlands and that they should be assessed on a site-by-site basis. This would ensure groups of dead trees or invasive species are not incorrectly identified as significant. Furthermore, we think that the Region should also consider studies completed locally as part of Secondary Plans and other projects when identifying these woodlands.</p> <p>5 The Greenbelt Plan 2017 and Growth Plan 2019 require municipalities to identify Water Resource Systems in Official Plans. Based on the two (2) options provided in the Natural Heritage Discussion Paper, how should the Water Resource System be incorporated into the ROP?</p> <p>We believe Option 2 is the most effective. Policies should appreciate the difference between the Water Resource System and NHS and especially the difference between Key Natural Heritage Features and Key Hydrologic Features versus Key Hydrologic Areas. The inclusion of Key Hydrologic Areas within mapping for the Regional Natural Heritage System would be confusing, since they are not protected within the Regional Natural Heritage System.</p> <p>6 Preserving natural heritage remains a key component of Halton’s planning vision. Should Halton Region develop a Natural Heritage Strategy and what should be included in such a strategy?</p> <p>There is an existing policy in the ROP that speaks to how the RNHS mapping gets updated. Policy 116.1 states:</p> <p><i>"116.1 The boundaries of the Regional Natural Heritage System may be refined, with additions, deletions and/or boundary adjustments, through:</i></p> <p><i>a) a Sub-watershed Study accepted by the Region and undertaken in the context of an Area-Specific Plan;</i></p> <p><i>b) an individual Environmental Impact Assessment accepted by the Region, as required by this Plan; or</i></p> <p><i>c) similar studies based on terms of reference accepted by the Region. Once approved through an approval process under the Planning Act, these refinements are in effect on the date of such approval. The Region will maintain mapping showing such refinements and incorporate them as part of the Region’s statutory review of its Official Plan."</i></p> <p>We support this policy and believe this policy objective should be maintained.</p> <p>7 Should the Regional Official Plan incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p> <p>We support parks outside of the urban area. Furthermore, we believe that stormwater management ponds should be allowed in the rural area (outside urban boundary) as long as Prime Agricultural Area is not removed.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>9 The Regional Official Plan is required to conform to the updated Natural Hazard policies in the PPS. What is the best approach to incorporate Natural Hazard policies and mapping?</p> <p>We agree with Town of Milton and Town of Halton Hills comments that the local municipalities should be involved with the mapping of natural hazards and furthermore, we believe the Region should defer the technical mapping to the local municipalities.</p> <p>10 How can Halton Region best support the protection and enhancement of significant woodlands through land use policy?</p> <p>As previously noted, the quality of woodland should be considered. Dead trees and invasive species should not be lumped in with woodlots of significance.</p> <p>Natural Heritage – General Questions</p> <p>2 Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?</p> <p>We would like to add that NHS in the settlement areas should be excluded. Policies should differentiate between different Provincial Plan areas, not just adopt a blanket, most restrictive approach.</p> <p>Climate Change – Technical Questions</p> <p>1 Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?</p> <p>We believe that putting more density in the built boundary and greenfields is not the best or only way to curve climate change and minimize green house emissions. Is the Region exploring other strategies such as the importance of conservation, reuse and recycle? Or perhaps providing more electric charging stations to promote electric vehicle usage? Land use planning is not the solution to climate change. We encourage Regional staff to diversify their strategies rather than wager all solutions to planning.</p> <p>2 How do you think the Regional Official Plan can help Halton respond to climate change? What mitigation and adaptation actions would you like to see embedded in the Regional Official Plan?</p> <p>The Region should focus on programs over policies in curving climate change. Has the Region weighed the benefits to setting programs over policies in curving climate change? Why does Regional staff feel that ROP policy is the way to go in dealing with climate change? Is the Region prepared to provide financial and planning incentives for the industry to implement energy conserving measures to development such as solar heating/cooling, electric vehicle charging stations, active transportation facilities, etc.</p> <p>3 Halton’s population is forecast to grow to one million people and accommodate 470,000 jobs by 2041. What do you think about policies to plan for climate change through more compact urban form and complete communities? In your opinion, are we growing in the right direction?</p> <p>We agree with the Town of Milton that a more compact urban form should not be at the expense of meeting community wellness, health and active living for all ages, and these factors need to be considered when assessing if intensification can be supported within the built boundary.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
29.	Burlington Green	<p>Attached per email dated 2020-10-30</p> <p>Dear Chair Carr, Halton Mayors, Members of Regional Council and Halton Region Staff,</p> <p>The COVID-19 pandemic has reinforced the inextricable connections between human health, equitable and just communities, a resilient economy and the current climate and biodiversity crises. Governments must recognize and act on this understanding by researching, reporting and making decisions with an integrated or 'ecosystem' approach, in order to provide a liveable, equitable and sustainable future for all. Additionally, Halton Region must consistently be accountable for their Climate Emergency Declaration and their commitment to the residents of Halton Region.</p> <p>While Burlington Green recognizes the inextricable connections between the environmental, social, and economic aspects of sustainability, our specific area of focus pertains to the health of the environment, and while all Regional Official Plan (ROP) Discussion Papers are of importance, and interconnect, at this time we have chosen to provide comment specific to the Climate Change Discussion Paper . Climate change is the most significant and defining issue of our time '...with municipalities directly influencing roughly half of Canada's greenhouse gas emissions.'¹ Thus, there exists both a tremendous responsibility and opportunity to prioritize action on climate as the driving policy framework for the Regional Official Plan going forward.</p> <p>Burlington Green offers the following high-level recommendations:</p> <ul style="list-style-type: none"> • The overall ROP vision should focus on sustainable and equitable growth, in light of the climate and biodiversity crisis, systemic racism, and the COVID-19 pandemic. This supports the Region's Climate Emergency Declaration, Natural Heritage & Land Use Planning, your work on human health, diversity and equity issues, and the opportunity presented by COVID-19 to "build back better" by creating new jobs in the green sector. • The Climate Change discussion paper should act as the guiding document for the ROP review and inform the other Discussion papers and more importantly, determine the policy directions of the region's 4 municipal Official Plans. It is recommended that the Region include a carbon reduction target in the Official Plan and direct Halton municipalities to do the same in their respective Official Plans(dovetailing municipal Climate Action Plans). • The ROP will guide land use and growth in Halton for years to come. Traditional planning approaches are not enough to address the current climate and biodiversity crises. Bold, climate and environmental protection driven policies are needed to shift the region's suburban communities to complete communities that are transit oriented, pedestrian friendly and carbon neutral. It is important to prioritize land use policies that achieve these targets at the regional level, and that these policies be reflected in municipal official plans. • Public engagement: due to the technical nature and the number of discussion papers and surveys available for comments, in order to invite broader and more meaningful community engagement, we recommend that staff from each Halton municipality review the ROP Discussion papers via their 'own' Strategic and Official Plans and Climate Emergency lens, to then prepare user-friendly overviews with recommendations, inviting the community to review and provide input. Sharing with the community how the ROP will potentially shape the landscape and policy decision-making within their own communities as well as within the Region as a whole, is likely to result in more informed, effective engagement, and an improved cohesive and inclusive process. 	<p>Climate Change Policy Direction CC– 1 provides the direction to comprehensively review the policy sections of each area of the entire ROP and look for all climate change challenges and opportunities. It will strengthen and enhance the Regional Official Plan's vision, goals, objectives, policies, and definitions so that the impacts of a changing climate are a key factor to consider in making decisions on growth and development and the protection of the Region's natural heritage, water resource, and agricultural systems. More details on other climate change policy directions can be viewed in the Policy Directions Report.</p> <p>Halton's local municipalities have provided comments for each ROPR Discussion Paper. Those comments located in the Public Authorities Response Chart, have informed the development of policy directions. Regional responses to local municipal comments are provided in the response charts.</p> <p>In response to your recommendation on developing carbon reduction targets, Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p> <p>In addition, the Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p>

No.	Source	Submission	Response
		<p>In summary, BurlingtonGreen urges Halton Regional Council to assess the OPR process holistically recognizing the four concurrent crises, and driven by and with accountability to the declared Climate Emergencies in Halton.</p> <p>Respectfully, The Advocacy Team BurlingtonGreen Environmental Association</p>	
30.	10310 Sixth Line	<p>Attached per email dated 2020-10-30 (Jennifer Lawrence)</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 10310 Sixth Line Part Lot 12, Concession VI Town of Halton Hills</p> <p>I have been retained by David and Claudette Taylor to provide professional planning advice related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 10310 Sixth Line in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p> <p>The Subject Lands are located north of 10 Sideroad, on the west side of Sixth Line, as shown on Attachment 1 and contains drainage features associated with the Sixteen Mile Creek. These two drainage features, and their associated hazards and/or wetland habitat, are regulated by Conservation Halton (CH) pursuant to Ontario Regulation 162/06, as shown on Attachment 2. The current RNHS limits on the Subject Lands is generally coincident with these CH regulated areas (Attachment 3).</p> <p><u>Proposed ROPR RNHS Limits</u></p> <p>The extent of the NHS on the Subject Lands has increased substantially as compared to the existing ROPA 38 RNHS (Attachment 4). This increase is attributable to two changes:</p> <ol style="list-style-type: none"> 1. A 500m wide NHS corridor established through the Growth Plan; and, 2. The addition of a Regional NHS Component (Buffer/Enhancement/Linkage) southerly to 10 Sideroad from the south limit of the east-west drainage feature. <p><u>Growth Plan NHS</u></p> <p>The Growth Plan NHS is a 500m wide corridor that has somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection, especially within that portion of the 'Y' connection north of 10 Sideroad and the eastern link does not connect to an NHS east of Trafalgar Road. The Subject Lands are near the base of the eastern link of the 'Y' connection as shown on Attachment 5.</p> <p>The Region of Halton, in collaboration with their local municipal partners prepared a report titled</p>	<p>Regional staff met with the landowner on April 14, 2021, and a subsequent site visit was held on June 9, 2021, with Conservation Halton Staff to review examine the watercourse and small portion of the wetland that has been identified on the property. The watercourse and wetlands are mapped by Conservation Halton (CH). Halton Region uses this data source to map key features in the Region's Natural Heritage Mapping in accordance with the Provincial plans/policies and Regional Official Plan policies. Based on the site visit, CH has identified refinements to their regulations mapping, which will be reflected in the next update to the proposed draft RNHS mapping. For the Natural Heritage System Mapping for the Growth Plan, the policies and mapping associated with this system must be implemented as per Policy 4.2.2 of the Growth Plan. Based on the Growth Plan 'Technical Paper' as discussed in Section 3.0, the Natural Heritage System Mapping for the Growth Plan did not meet the criteria for refinement as identified in the 'Technical Paper'. Detailed e-mail correspondence can be made available upon request.</p>