

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

Overview

This document is part 4B 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'.

The submissions are organized chronologically.

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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>

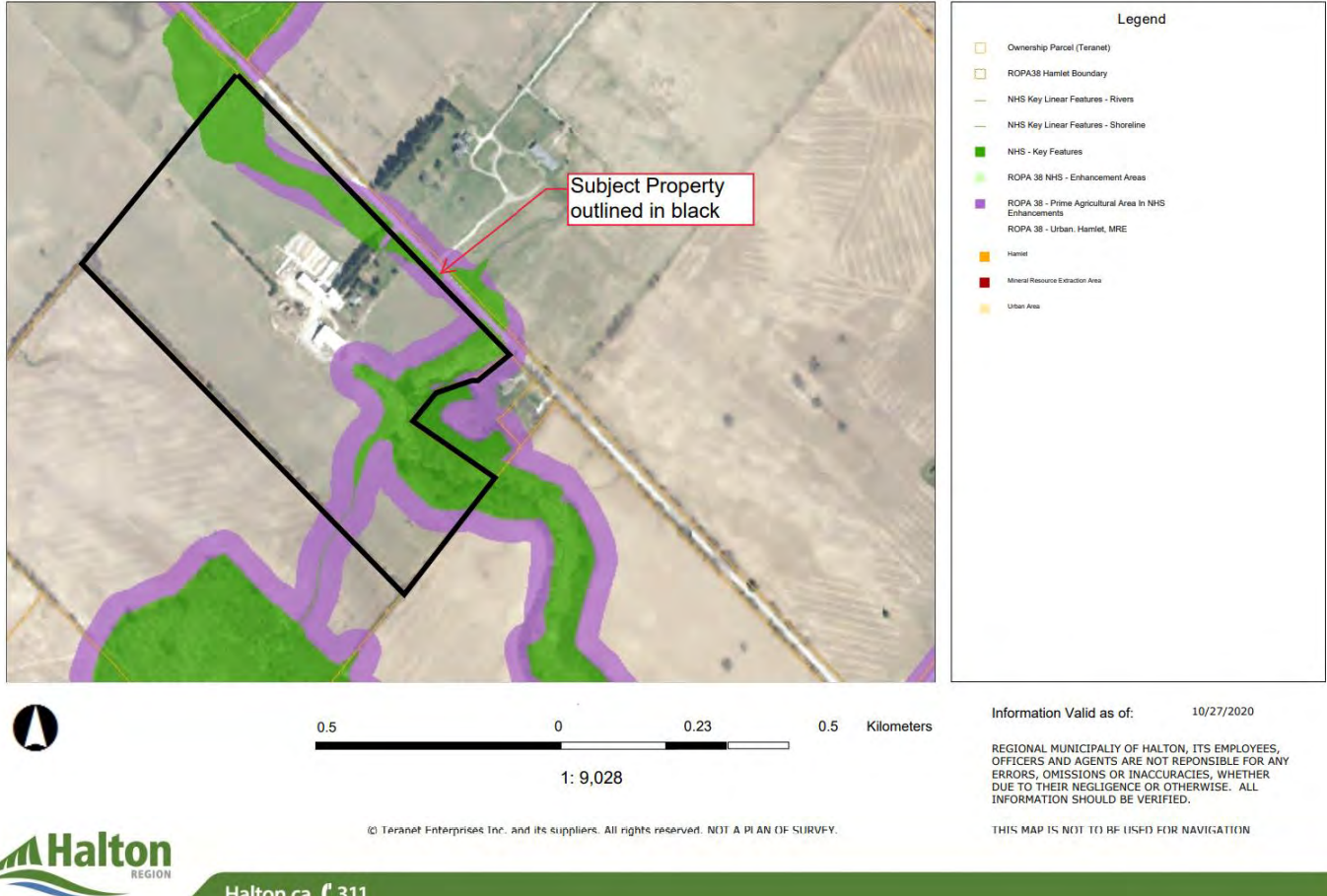
No.	Source	Submission	Response
		<p>'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was presented to Regional and Local Councils and was submitted to the Province 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. As noted above, the Subject Lands are within 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.</i></p> <p><i>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 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>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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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 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>NHS Component</u></p> <p>As noted above, south of the east-west tributary the Subject Lands have been shown as NHS Component (Buffer/Enhancement/Linkage) however, it is unclear which of these three functions this area is intended to provide. Given that this area is in-keeping with the extent of the Growth Plan NHS, it is assumed this area is intended to provide a linkage function however, how this linkage would actually function on the landscape is unclear, especially if the Growth Plan NHS ‘Y’ connection is removed, as requested above. Further, since the Subject Lands are near the base of the ‘Y’ connection, the NHS Component through this area is approximately 1km in width. It is requested that justification be provided for such a substantial NHS Component through this area with rationale beyond the fact that it matches the Growth Plan NHS extent.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

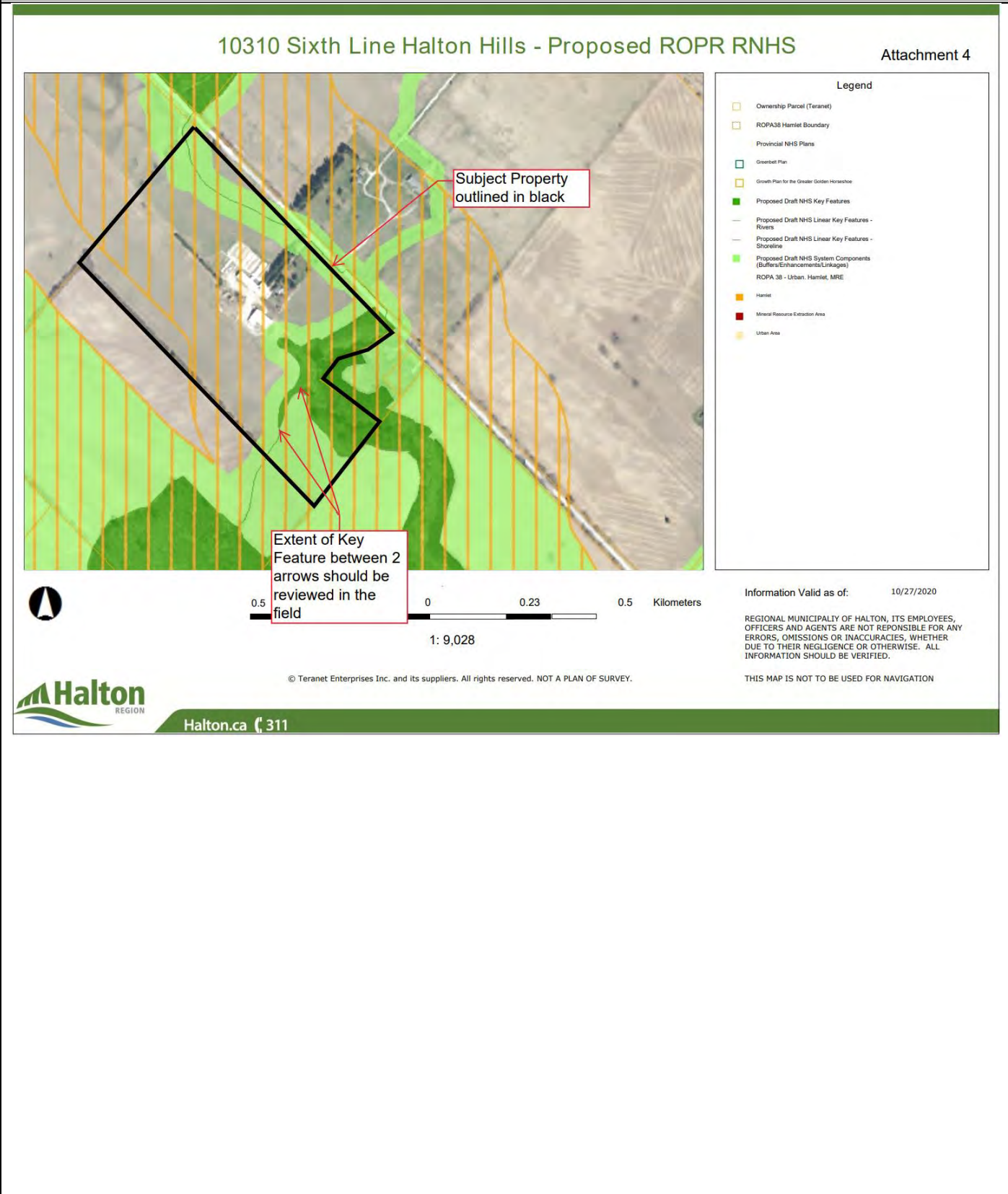
No.	Source	Submission	Response
		<p><u>Key Features</u></p> <p>While the proposed ROPR Key Feature mapping remains unchanged from the ROPA 38 Key Feature mapping, there is a concern that a swale through the farm field has been identified as a Key Feature. The area of concern is identified on Attachment 4. Based on a review of aerial photography, this feature is a swale with no associated riparian vegetation and would not meet any of the criteria of a Key Feature. It is noted that CH's mapping identifies this area as a wetland however, a site visit with Regional and CH staff is requested as part of the ROPR process to review the extent of wetland in this area and modify the Key Feature mapping accordingly.</p> <p><u>Recommendation</u></p> <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 '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>In addition, we request that Region and CH staff attend on-site to confirm whether wetland habitat exists along the east-west swale and, if not, that the Key Feature mapping be updated accordingly. Finally, the identification of NHS Component (Buffer/Enhancement/Linkage) on the southern portion of the Subject Lands has not been justified nor explained. Additional information is requested as to what function this area is intended to provide (buffer, enhancement or linkage) and whether such a designation is appropriate.</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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<div data-bbox="655 268 1703 1260"> </div> <div data-bbox="1712 243 1951 1260"> <p>Attachment 1</p> <p>Legend</p> <ul style="list-style-type: none"> Town Boundary Urban, Hamlet, Rural Area Urban Hamlet Rural Cluster Street Parcel, Assessment <p>Notes</p> </div> <div data-bbox="655 1179 1703 1260"> <p>0 0.38 0.8 Kilometers</p> <p>Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere Scale: 1:14,825 © The Corporation of The Town of Halton Hills Date: 10/27/2020</p> <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> </div>	

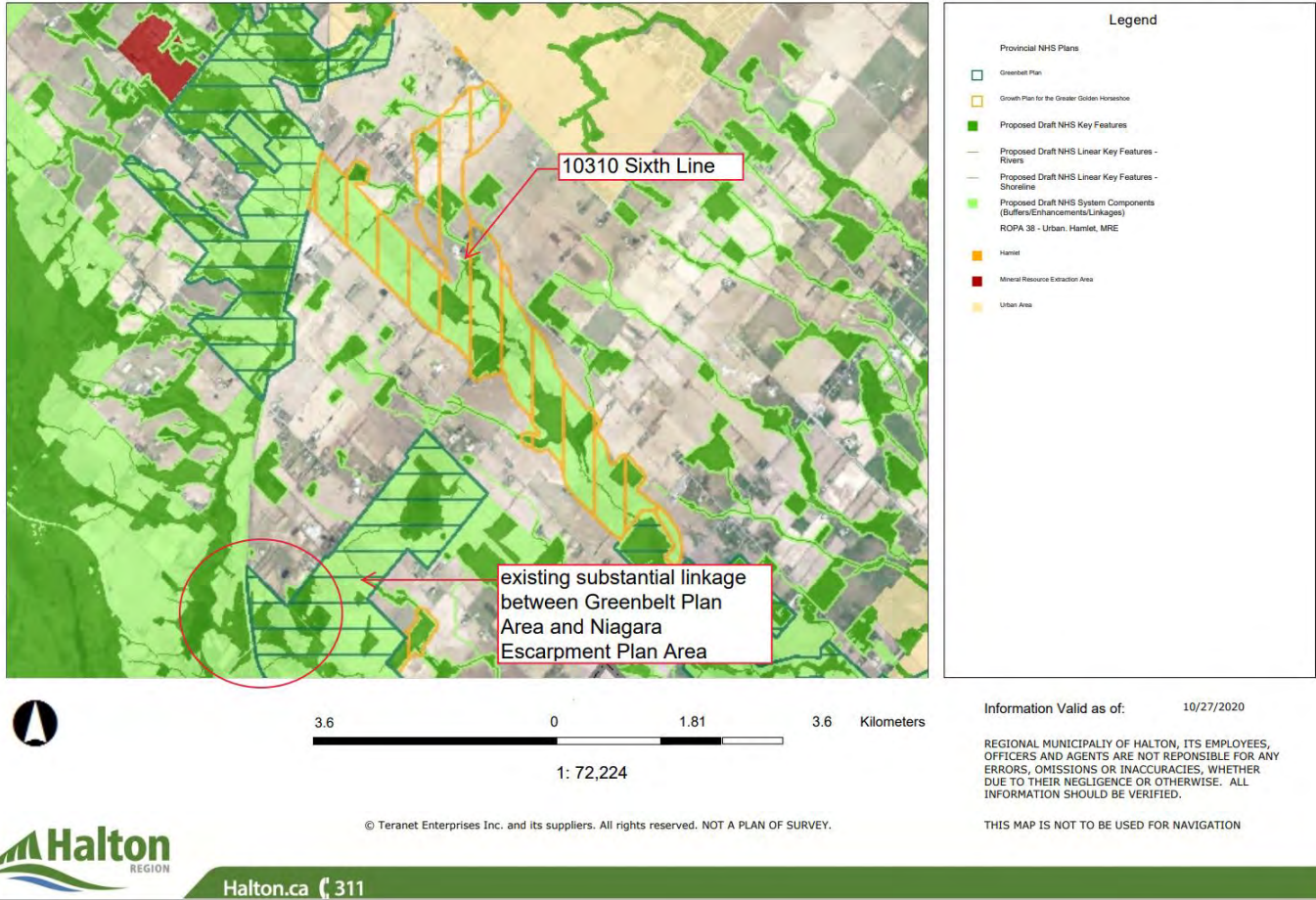
No.	Source	Submission	Response
		<p style="text-align: center;">10310 6th Line Halton Hills - CH ARL Attachment 2</p>  <p>10/27/2020, 2:24:18 PM</p> <p>1:9,028</p> <p>0 0.05 0.1 0.2 mi 0 0.07 0.15 0.3 km</p> <p>CH GIS. Created by Conservation Halton GIS, USDA FSA, GeoEye, Maxar, Esri, Community Maps Contributors, Province of Ontario, Esri, HERE, Garmin, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, NRCan, Parks Canada, Conservation Halton</p> <p>Conservation Halton, 2020 Conservation Halton, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

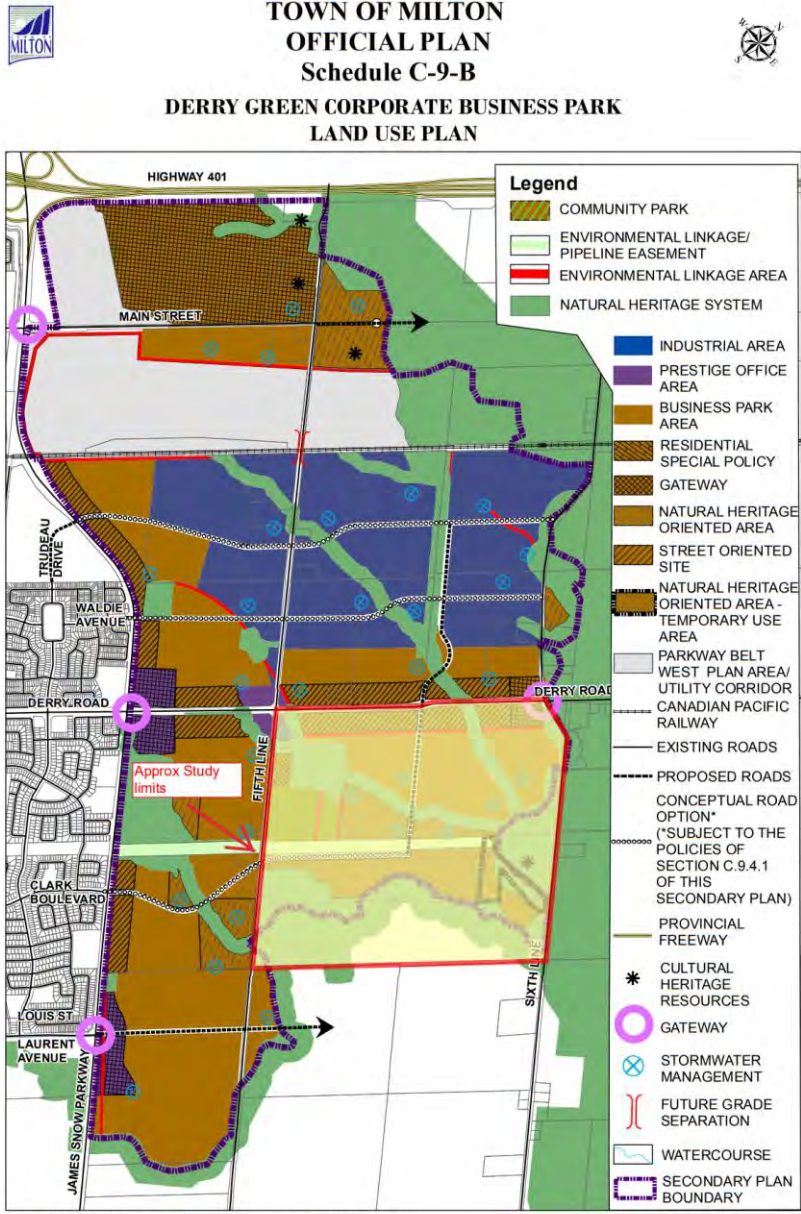
No.	Source	Submission	Response
		<p style="text-align: center;">10310 Sixth Line Halton Hills - ROPA 38 RNHS Attachment 3</p>  <p style="text-align: center;">© Teranet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p> <p style="text-align: center;">Halton REGION Halton.ca 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: center;">10310 Sixth Line Halton Hills - ROPR NHS Overview Attachment 5</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>
31.	Remington Group and Anatolia Capital Corp	<p>Attached per email dated 2020-10-30 (Stantec Consulting)</p> <p>Reference: Regional Official Plan Review June 2020 Natural Heritage Discussion Paper</p> <p>Please find enclosed the following memo prepared on behalf of our clients, The Remington Group Inc (Remington) and Anatolia Capital Corp (Anatolia), in response to the Phase 2 Discussion Papers presented by Halton Region (Region) as part of the Regional Official Plan Review (ROPR). Our client's lands are located within the Derry Green Corporate Business Park Secondary Plan, specifically within SIS Areas 3, 4 and 5A, as illustrated on the attached Schedule C-9 excerpt from the approved Secondary Plan.</p> <p>According to the Region's Natural Heritage Discussion Paper (June 2020) and supporting technical memos, the Region is revising the Natural Heritage System (NHS) mapping to recognize planning decisions and updated information since ROPA 38 came into effect in 2009. The Region notes that a baseline date of June 2018 was used for the preparation of their 2019 RNHS mapping however, they have acknowledged that additional changes will be made to the revised mapping prior to formal adoption</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 has been undertaken thus far. The Policy Directions Report will describe key areas where changes to the Regional Official Plan are proposed.</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 your responses to the Discussion Questions from the Natural Heritage Discussion Paper presented in your submission:</p>

No.	Source	Submission	Response
		<p>of the new OP to include planning approvals up to the OP approval date. As such, we would like to make Region staff aware that our clients are in the process of compiling the SIS for Areas 3, 4 and 5A for submission by the end of 2020 which will include updated mapping to reflect final NHS limits as staked and surveyed with the Town of Milton (Town), Region and Conservation Halton (CH).</p> <p>Should you wish to discuss further, please contact the undersigned.</p> <p>Regards, Stantec Consulting Ltd. Nathan Jamieson P.Eng. Senior Principal, Community Development</p>  <p>TOWN OF MILTON OFFICIAL PLAN Schedule C-9-B DERRY GREEN CORPORATE BUSINESS PARK LAND USE PLAN</p> <p>Legend</p> <ul style="list-style-type: none"> COMMUNITY PARK ENVIRONMENTAL LINKAGE/ PIPELINE EASEMENT ENVIRONMENTAL LINKAGE AREA NATURAL HERITAGE SYSTEM INDUSTRIAL AREA PRESTIGE OFFICE AREA BUSINESS PARK AREA RESIDENTIAL SPECIAL POLICY GATEWAY NATURAL HERITAGE ORIENTED AREA STREET ORIENTED SITE NATURAL HERITAGE ORIENTED AREA - TEMPORARY USE AREA PARKWAY BELT WEST PLAN AREA/ UTILITY CORRIDOR CANADIAN PACIFIC RAILWAY EXISTING ROADS PROPOSED ROADS CONCEPTUAL ROAD OPTION* ("SUBJECT TO THE POLICIES OF SECTION C.9.4.1 OF THIS SECONDARY PLAN) PROVINCIAL FREEWAY CULTURAL HERITAGE RESOURCES GATEWAY STORMWATER MANAGEMENT FUTURE GRADE SEPARATION WATERCOURSE SECONDARY PLAN BOUNDARY <p>Copyright 2013: Town of Milton, Teranet Inc Updated: June 18, 2013</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; 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> <p>For the Derry Green and Boyne Secondary Plan areas, refinements made to the Regional Natural Heritage System that was 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 was released with 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> <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</p>

No.	Source	Submission	Response
		<p>Date: October 29, 2020 Subject: Regional Official Plan Review June 2020 Natural Heritage Discussion Paper Our File: 19-1369</p> <p>Dillon Consulting Limited (Dillon) has completed a review of the 2020 Natural Heritage Discussion Paper (referred to herein as the “Discussion Paper”) and Draft 2019 Natural Heritage System (the “Draft 2019 NHS”); released as part of the Regional Official Plan Review (ROPR) for the Regional Municipality of Halton (the Region). The purpose of this review was to provide comments on the Discussion Paper and Draft 2019 NHS the Anatolia Capital Corp. (“Anatolia”) and Remington Group Inc. (“Remington”), for which Dillon is currently providing environmental consulting services.</p> <p>It is understood that a review of natural heritage policies and refinements to the Regional Natural Heritage System (Regional NHS) are proposed as part of the ROPR in order to improve protection to strengthen the long-term viability of the Region’s natural heritage and water resources through land-use planning. Through the ROPR; and as identified through review of the Discussion Paper, and Draft 2019 NHS, the Region plans to update policies in order to:</p> <ul style="list-style-type: none"> • Be consistent with the Provincial Policy Statement (2020) and to conform to current applicable Provincial Plans; • Improve and clarify existing natural heritage policies; • Identify planning objectives needed to preserve and enhance the Regional NHS; and, • Improve the accuracy of the Regional NHS mapping. <p>Background Review</p> <p>To supplement our feedback on the Discussion Paper and Draft 2019 NHS, our review included the following background documents:</p> <ul style="list-style-type: none"> • Provincial Policy Statement (PPS; 2020); • A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the “Growth Plan;” Office Consolidation, 2020); • Greenbelt Plan (May, 2017); • Regional Official Plan Review Mapping Viewer (i.e. the Draft 2019 NHS mapping); • Regional Municipality of Halton Official Plan (ROP; 2019); • Quality Assurance/Quality Control Process Memo on the draft 2019 Regional Natural Heritage System (March, 2020); • Mapping Audit Technical Memo Review of the Regional Official Plan Natural Heritage System Policies + Mapping (May, 2020); • Policy Audit Technical Memo: Review of the Regional Official Plan Natural Heritage System Policies + Mapping (May, 2020); • Best Practices Review Technical Memo: Review of Regional Official Plan and Natural Heritage Systems Policies + Mapping (May, 2020); • Background Review Technical Memo: Review of the Regional Official Plan and Natural Heritage System Policies + Mapping (May, 2020); • Regional Official Plan Guidelines Draft Environmental Impact Assessment Guidelines (2020); • Regional Official Plan Guidelines Environmental Impact Assessment Guidelines (2014); • Conservation Halton Environmental Impact Study Guidelines (November 2005); and, • Natural Heritage System Definition and Implementation Sustainable Halton Report 3.02 (April, 2009). 	<p>landowner and consultants with regards to comments related to the Remington Group and Anatolia Capital Corp submission.</p>

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		<p>In addition to reviewing the information listed above, Dillon attended the Rural and Agricultural System and Natural Heritage System combined Public Information Centre meeting on September 18, 2020, as well as a separate meeting for the BILD Halton Chapter with Regional municipal staff on September 28, 2020, to discuss the 2020 Discussion Paper and Draft 2019 NHS.</p> <p>Summary of Comments</p> <p>As a result of our review, we have provided specific comments on the following items on behalf of Anatolia and Remington:</p> <ul style="list-style-type: none"> • Distinction between Linkages, Buffers, Enhancement Areas within the draft 2019 NHS; • Determining Buffers and Role of Vegetation Protection Zones; • Integration of the Provincial mapping (Growth Plan) into the Regional NHS; • Integration of prime agricultural areas into the Regional NHS; and, • Inclusion of a Water Resource System (WRS) within the Regional NHS. <p>A summary of our feedback for each of the listed topics above are provided below.</p> <p>In addition, responses to the discussion questions provided by the Region within the Discussion Paper that are specific to natural heritage have been provided within Attachment A.</p> <p>Distinction between Linkages, Buffers and Enhancement Areas within the Draft 2019 NHS</p> <p>As described in the Natural Heritage System Definition & Implementation Report created as part of Phase 3: Sustainable Halton Report 3.02 (2009), linkages, buffers and enhancement areas are defined as follows:</p> <p>Linkage Areas and Buffers:</p> <p><i>Ecological linkages are considered at two scales in the environment:</i></p> <p><i>Regional linkage corridors ensure continuous linkage across the landscape, and as such they are wider in order to facilitate the long term movement of all plant and animals, in the very long term. The width of regional linkages is consistent with the linkages in the Greenbelt NHS.</i></p> <p><i>Local linkage corridors connect isolated natural heritage features to the larger NHS. While they are narrower they are intended to accommodate the short and long term movement requirements of plant and animals over shorter distances.</i></p> <p><i>Linkage corridors in the Sustainable Halton NHS meet the following guidelines:</i></p> <ul style="list-style-type: none"> • <i>Regional Linkage: 300 to 400 m width; and,</i> • <i>Local Linkage: 60 to 100 m width.</i> <p><i>The Sustainable Halton NHS includes the following minimum buffers intended to protect natural heritage features as follows:</i></p> <ul style="list-style-type: none"> • <i>Woodland Buffer: 30 metres; and,</i> • <i>Wetland Buffer: 30 metres.</i> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>The Sustainable Halton NHS also includes buffers along watercourses based on the following criteria:</i></p> <ul style="list-style-type: none"> • <i>All water watercourses located within the Regulatory Floodline have a 30 metre buffer on both sides; and,</i> • <i>Watercourses located outside the Regulatory Floodline that are determined to provide an important ecological linkage function have a 30 metre buffer on both sides.</i> <p>Enhancement Areas:</p> <p><i>Enhancement Areas include lands that may be without obvious natural heritage features and include areas such as agricultural land, cultural meadow, and cultural thicket, etc. Enhancement areas contribute to the NHS by protecting and restoring critical ecological functions such as, ecological connectivity among natural area patches, surface water catchment areas for wetlands, minimum core area thresholds and improved core area shape that reduce edge effect and enlarge interior habitat.</i></p> <p><i>The size thresholds considered in the creation of the Sustainable Halton NHS follow the minimum core areas defined by Environment Canada (2004):</i></p> <ul style="list-style-type: none"> • <i>Core Area Woodlands: 20 ha;</i> • <i>Core Area Wetlands: 10 ha for marsh/thicket and 20 ha for treed swamp; and,</i> • <i>Core Area Open Habitat: 15 ha.</i> <p>We understand that the mapping layer containing the Linkages, Enhancement Areas and Buffers utilized in the Draft 2019 NHS was created as part of ROPA 38 based on the above descriptions. However, we note that the specific delineation of these layers was not provided in the mapping of the Regional NHS within Map 1 and Map 1G of the ROP (2019), as suggested in the Sustainable Halton Report 3.02 (Figure 3: Conceptual Map of the NHS Development; Attachment B).</p> <p>As stated in the Sustainable Halton Report 3.02 (2009), the preparation of detailed land use plans will allow adjustment of the NHS boundary to take advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies. As part of the Sustainable Halton Report 3.02 (2009), an implementation framework was created in an effort to improve land use planning decisions by providing flexibility in making NHS boundary adjustments to accommodate urban land uses that meet human needs while also achieving the NHS goal of long term protection.</p> <p>The implementation framework for the Sustainable Halton NHS was based on distinguishing identifiable components that make up the NHS and determining the degree of flexibility of each component. These steps include, but are not limited to:</p> <ul style="list-style-type: none"> • Classifying the NHS into its component parts in order to document the underlying reason for identifying each section of the NHS; • Articulating the degree of flexibility of the NHS boundary associated with each NHS component and establish a set of rules or guidelines for adjustment of the final NHS boundary; and, • Identifying the point in the development process and/or the type of study(s) that should be completed to adjust NHS boundaries. <p>As stated in the Sustainable Halton Report 3.02 (2009), because the location of the NHS boundary relies on our current knowledge of varied natural heritage features and functions that undergo natural changes over time and because the NHS is based on several relevant policies; the degree of flexibility will vary</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>throughout the NHS. The report goes on to suggest various levels of flexibility for each of the components, including linkages, buffers and enhancement areas, as described below:</p> <p>Linkage Flexibility:</p> <p><i>There may be substantial flexibility in the location and/or adjustment linkage boundaries. For all linkages, the location must be based on providing ecologically functional connections that maintain a consistent width, however, in some cases an entire linkage could be shifted one way or another providing the ecological function is maintained. In cases where a linkage is centered on a feature, it is important that the feature continue to be included within the linkage, and this may in turn limit the degree of flexibility in moving the linkage. Where a linkage is associated with a watercourse, it may be possible to move the watercourse feature and the associated linkage function, to a new location within the landscape. While the location of individual connections may be flexible, the number of connections should remain the same.</i></p> <p>Buffer Flexibility:</p> <p><i>There is low flexibility for the minimum buffer widths to be applied from the edge of the feature being protected. Field studies are required to make a precise determination of the location of a feature such as a wetland or woodland. In addition, in some cases more detailed studies may recommend a buffer width greater than the minimum 30 m buffer width defined here in order to protect natural heritage features and functions.</i></p> <p>Core Area Enhancement Flexibility:</p> <p><i>There may be some flexibility in determining the final boundary of proposed core area enhancements providing the ecological intent and functionality of proposed enhancement is achieved.</i></p> <p>As stated above, the implementation framework for the Sustainable Halton NHS was based on distinguishing <i>identifiable components</i> that make up the NHS. The consolidation of these components into one layer makes applying various levels of flexibility or other applicable policies of the ROP within this layer impossible, as this was not the intent of the implementation framework.</p> <p>In addition, Section 4.5 of the Discussion Paper notes that “<i>An analysis was completed to refine the components of the NHS including buffers, enhancement areas and linkages. These were evaluated to ensure they were still valid after the updates, identify new enhancement and linkages opportunities and that those identified were consistent with the approach taken for the existing, in-force Regional NHS</i>”. Given the consolidation of these features, it is unclear how this analysis was conducted and it is impossible to identify where refinements to these components have been made as described in the supplementary QA/QC and Mapping Audit technical memos. For transparency purposes, and in order to apply policies or development criteria to these areas, distinction between these three components would be required, in accordance with Figure 3 of the Sustainable Halton Report 3.02 (2009). We recommend that revised mapping be updated to match this conceptual figure to allow practitioners apply relevant policies and scope environmental studies accordingly. Alternatively, this consolidated layer should function as an area of flexibility to apply linkage, enhancement or buffer options on a site specific basis, with no specific restrictions, or policy requirements.</p> <p>Further refinement is also needed to specify additional layers within Enhancement Areas of the draft NHS. Section 3.3 of the Mapping Audit Technical Memo noted that “Centres for Biodiversity” should be</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>specifically delineated from other Enhancement Areas of the Regional NHS since these components were not specifically defined in the 2019 ROP. As per definitions provided in Section 4.6 of the Sustainable Halton Report 3.02, it is understood that Centers for Biodiversity are considered “<i>Large (> 200 ha) areas composed of multiple core areas and their core enhancement areas</i>”... and that these areas are to “<i>provide a variety of different habitats that are supportive of a species ability to complete their life cycle.</i>” Based on areas mapped, it cannot be determined what habitats are proposed, or which species are intended to benefit from enhancement activities. To remedy this in the revised Regional NHS, it is proposed that the identification of Centers for Biodiversity be conducted as a result of environmental field studies and identification of candidate and confirmed Significant Wildlife Habitat (SWH), and habitat for Species at Risk (SAR). This recommendation is in line with those proposed in Section 3.3 of the Sustainable Halton Report 3.02, which notes that substantial flexibility should be allotted for the adjustment of these areas should the principles of conservation biology be applied.</p> <p>It is also understood that updated NHS mapping will incorporate Environmentally Significant Areas (ESAs) within the Regional NHS. Additional policies for ESAs will also be included in amended versions of the ROP. As noted above, we request that updated mapping for the Regional NHS identify these areas specifically, to assist in the application of relevant policies for the protection of these features.</p> <p>Determination of Buffers and the Role of Vegetation Protection Zones</p> <p>It is acknowledged that Buffers and Vegetation Protection Zones (VPZ) are terms applied in different planning documents that can have varying meaning. In Halton Region, buffers are used to determine setbacks in the ROP and EIS Guidance documents, whereas VPZ are used to determine setbacks specific to Key Features located outside of settlement areas within the Natural Heritage System of the Greenbelt (GBNHS) and Natural Heritage System of the Growth Plan (NHSGP) (i.e., could be considered “regulated buffers”). We note that the ROP definition for VPZ is different from the simplified version provided in the GBNHS and NHSGP.</p> <p>Upon review of the Policy Audit Technical Memo (2020), we recommend maintaining use of the two terms (i.e. Buffer and VPZ) under the current ROP structure; however, suggest that revisions be made to update the definitions to clarify their respective applications for specific areas. The Buffer term should be maintained as it is more appropriate for application in Settlement Areas. We agree that the current definition for VPZ in the ROP should be revised to match the updated definitions for VPZ provided by the GBNHS and NHSGP.</p> <p>In addition, specific policy guidance should be provided for the application of Buffers in Settlement Areas; clear direction is needed to identify how Buffer determination should be flexible, and consider sensitivities of the NHS as a result of future studies or proposed adjacent land uses. For example, a 30 m buffer/VPZ is currently recommended to protect Key Features of the Regional NHS, as well as Core Features identified in provincial mapping. This setback does not, however take into consideration the current existing conditions or the proposed land use to occur within adjacent lands. As identified in the Sustainable Halton Report 3.02, 2014 and 2020 (draft) Regional Environmental Impact Assessment Guidelines, Conservation Halton Environmental Impact Assessment Guidelines, and the 2020 Best Practises Review Technical Memo, the precise boundary of the Regional NHS and determination of buffer/VPZ widths are to be determined through the completion of environmental studies. It is recommended that the further refinement of protective buffers be determined using results of site specific environmental studies, as well as through consultation with the Region, local municipalities, and conservation authorities. Additional revisions to policies should also identify permitted uses within buffer areas (i.e. SWM Facilities, Low Impact Development measures, and trails).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

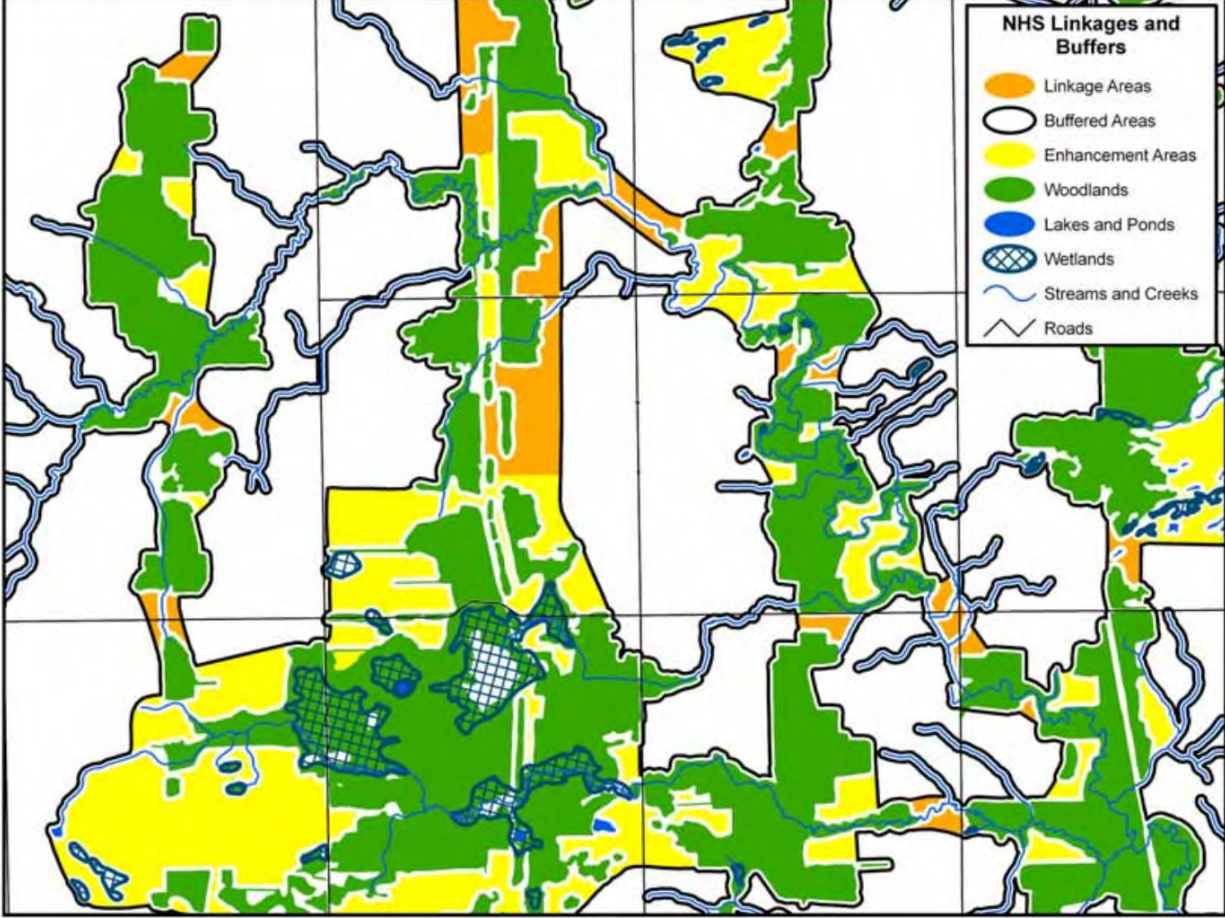
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		<p>Integration of Provincial Mapping into the Regional NHS</p> <p>As discussed in Section 3.2 of the Discussion Paper, the Region plans to harmonize natural heritage policies of the updated Growth Plan (2020) and Greenbelt Plan (2017) as part of the ROPR. This is in line with new policies of the Growth Plan (2020); the GBNHS already exists within mapping for the Regional NHS as an overlay. Further updates are required to incorporate updates of the NHSGP into policies of the ROP and Regional NHS mapping. Using this rationale, the draft 2019 NHS mapping now includes a layer for the NHSGP without any refinements.</p> <p>Upon review of Section 4.3.3.1 and Section 4.2.2.2, the NHSGP is intended to be included “<i>as an overlay in official plans.</i>” Furthermore, Section 4.2.2.5 of the Growth Plan allows municipalities to refine the Provincially-mapped NHS: “<i>In implementing the Natural Heritage System, upper- and single-tier municipalities may through a municipal comprehensive review, refine provincial mapping with greater precision in a manner that is consistent with the plan.</i>” As a result of this text, it is recommended that the mapping layer for the NHSGP remain only as an overlay for reference purposes, and not be incorporated into the Regional NHS. This will allow for flexibility in applying the Provincial NHS, where the policies of the ROP prevail, etc. Areas within this overlay which are currently mapped as Enhancements, Linkages and Buffers should be refined; it is understood that a request has been sent to the Province from the Region to amend the Provincial mapping from Settlement Areas.</p> <p>Our recommendations for the inclusion of an NHSGP overlay are consistent with Option 2 of the Discussion Paper and with policies provided for the Greenbelt Plan (2017). As per Section 3.2.2 (5) of the Greenbelt Plan, which states “<i>when official plans are brought into conformity with the Greenbelt Plan, the Natural Heritage System may be refined, with greater precision, in a manner that is consistent with the plan and the system shown on Schedule 4.</i>” This policy recognizes and acknowledges that Regional NHS boundaries may be refined as a result of more detailed information becoming available through future planning exercises provided that the original goal of the Regional NHS is met. This policy is consistent with the implementation framework that was originally proposed in the Sustainable Halton Report 3.02.</p> <p>Integration of the Agricultural System and Prime Agricultural Areas into the Regional NHS</p> <p>Prime Agricultural Areas are defined as specialty crop areas, prime agricultural areas and associated Canada Land Inventory Class 4 through 7 lands. As per Section 1.2.1 and Section 4.2.6 of the Growth Plan (2020), the long-term viability and productivity of Prime Agricultural Areas are to be protected, supported and enhanced; the Prime Agricultural Area designation is to occur outside of Settlement Areas within the Agricultural System. The Agricultural System is currently depicted in Map 1E of the ROP (2019).</p> <p>Recent changes to the Growth Plan (2020) require that Prime Agricultural Areas including specialty crop areas be designated within the municipal plans. To conform to the Growth Plan (2020) and to show the relationship between the natural heritage features and the Regional Agricultural System, the Region has proposed options to map these areas together as part of the ROPR. Four options were reviewed in the Discussion Paper. Based on our review, we recommend that Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage System Overlay) be carried forward into revised ROP mapping. Under this approach, the Key Features and Prime Agricultural Areas are represented as land use designations under a Natural Heritage System Overlay. Under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features)</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and Identifying Key Features. In keeping with recommendations provided earlier in the memo, we reiterate that separate layers for Linkages, Buffers and Enhancement Areas be provided in revised ROP mapping to assist with the identification and application of relevant policies.</p> <p>Inclusions of a Water Resource System within the Regional NHS</p> <p>As illustrated in Section 6.2 of the Discussion Paper, changes to the PSS (2020), the Growth Plan, 2019) and Greenbelt Plan (2017) identify the need to define and protect a Water Resource system (WRS). Within the Growth Plan (2020), the WRS is defined as “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.” As stated in Section 4.2.1.2, the WRS is required to provide long-term protection to Key Hydrologic Features, Key Hydrologic Areas and their functions. Key Hydrologic Features consist of wetlands and watercourses, whereas Key Hydrologic Areas consist of aquifers and groundwater recharge areas, etc.</p> <p>Based on our review of Section 6.2 of the Discussion Paper, mapping proposed to separate the Regional NHS and WRS is preferred (Option 2). While it is likely that some overlapping will occur, and features will be mapped in both the Regional NHS and WRS, it is agreed that the separation of these two systems will clarify that different policies will govern Key Natural Heritage Features and Key Hydrologic Features versus Key Hydrologic Areas. The inclusion of Key Hydrologic Areas within mapping for the Regional NHS would be confusing to readers, since Key Hydrologic Areas are not protected within the Regional NHS.</p> <p>Summary</p> <p>We appreciate the opportunity to review and participate in the ROPR. Based on our review of the materials listed above, we request that further information and layers be provided in the ROP and revised mapping for the Regional NHS be provided to specifically delineate areas identified as Linkages, Enhancement Areas, and Buffers. A single term should be carried forward in the amended ROP to identify appropriate setbacks (i.e. VPZ versus Buffer); furthermore, it is recommended that buffer widths be determined as an inclusive process that considers the results of field studies, the proposed adjacent land uses, and consultation with agency contacts. It is also requested that mapping of Provincial Plans be included as an overlay only and not integrated within the proposed Regional NHS. Furthermore, it is requested that layers for the WRS be kept separate from mapping for the Regional NHS.</p> <p>Enclosed Attachment A – Responses to NHS Discussion Paper Questions Attachment B – Relevant Excerpts from Policy Planning Documents</p> <p>Appendix A Responses to NHS Discussion Paper Questions</p> <p>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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Upon reviewing Section 3.3 of the Natural Heritage Discussion Paper for the Regional Official Plan Reviewer (June, 2020), Option 2 (Harmonize the Provincial NHSs) is preferred for incorporating the NHSGP into the ROP. • In this scenario, layers for the NHSGP and GBNHS would be combined and added as an overlay to the Regional NHS. While it is acknowledged that overlap would exist in policies of the NHSGP and GBNHS, differences would be reconciled through policy. • As mentioned in Section 3.3 of the Natural Heritage Discussion Paper, this approach would allow flexibility to include policies that reflect local considerations for the Regional NHS, rather than have the more restrictive policies apply (Option 1 and 3). <p>1. 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> <ul style="list-style-type: none"> • Refer to comments on implementation of the linkages, buffers, and enhancement areas. These goals and objectives were not met through ROPA 38 and the same mapping has been carried forward to the Draft 2019 NHS. <p>2. 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> <ul style="list-style-type: none"> • While natural heritage policies of the 2020 PPS do not address the delineation of buffers, the Greenbelt Plan and Growth Plan require a minimum of 30 m vegetation protection zones (VPZ) from Key Features. In accordance with the Greenbelt and Provincial mapping, Map 1G of the ROP currently has 30 m buffers applied to Key Features. Buffers within Map 1G are subject to refinement within the Region. As per Section 116.1 of the ROP, the <i>“boundaries of the Regional NHS may be refined with additions, deletions and or boundary adjustments, through.</i> <ul style="list-style-type: none"> ○ A subwatershed study accepted by the Region and undertaken in the context of an Area-Specific Plan; ○ An individual Environmental Impact Assessment accepted by the Region, as required by the ROP; or, ○ Similar studies based on terms of reference accepted by the Region.” • Similar refinements to buffers proposed for area-specific land uses have been put forward in the 2014 Ecological Buffer Guideline Review prepared for Credit Valley Conservation, as well as in the 2017 Framework for Regional Natural Heritage System Buffer Widths Refinements. • Moving forward, it is recommended that a single term be chosen when referring to buffers and VPZs in the ROP, as these two items provide the same function. • It is also recommended that minimum buffer standards not be provided in the ROP to continue to allow flexibility in area-specific land use planning. This approach is consistent with procedures currently utilized by the Region and local municipalities, in where appropriate buffer widths are determined based on the significance and sensitivity of the ecological feature and functions to be protected. These assessments would also consider the proposed negative impacts likely to be associated with the adjacent land use activities. The delineation of buffers for Key Features should be determined through consultation and collaboration with local municipalities, conservation authorities, as well as with the Region. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>3. 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> <ul style="list-style-type: none"> • Based on our review of the four options provided in Section 5.3, Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage System Overlay) should be carried forward into revised ROP mapping. Under this approach, the Key Features and Prime Agricultural Areas are represented as land use designations under a Natural Heritage System Overlay. • Under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features) interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and Identifying Key Features. • In addition to the layers proposed in Option 4, we also recommend that separate layers for Linkages, Buffers and Enhancement Areas be provided in revised ROP mapping to assist with the identification and application of relevant policies. <p>4. 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> <ul style="list-style-type: none"> • Based on our review of Section 6.2 of the NHS Discussion Paper, knowledge and experience in working in neighbouring municipalities, Option 2 (Separate the NHS and WRS) is the preferred option. While it is likely that some features will be mapped in both the Regional NHS and WRS, it is agreed that the separation of these two systems will clarify that different policies will govern Key Natural Heritage Features and Key Hydrologic Features (wetlands and watercourses) versus Key Hydrologic Areas (Aquifers, groundwater recharge areas, etc.). The inclusion of Key Hydrologic Areas within mapping for the Regional NHS would be confusing to readers, since Key Hydrologic Areas are not protected within the Regional NHS. <p>5. 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> <ul style="list-style-type: none"> • A Natural Heritage Strategy would assist the Region by providing a framework for initiatives to align goals of the Regional NHS to action items of the Region’s Business Plan. It is recommended that the development of a Natural Heritage Strategy should be an iterative process, and should be completed using an advisory committee with representation from land development, local farmers, and municipal staff. Consultation should occur throughout multiple check-points of the strategy’s development to ensure the framework meets the needs of all stakeholders. <p>6. Should the ROP incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p> <ul style="list-style-type: none"> • No comment. <p>7. 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>Comments are acknowledged. Please see above for a detailed response.</p>



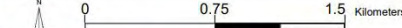
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		<ul style="list-style-type: none"> • No comment. <p>8. The ROP is required to conform to the updated Natural Hazard policies in the PPS. What is the best approach to incorporate Natural Hazard policies and mapping?</p> <ul style="list-style-type: none"> • No comment. <p>9. How can Halton Region best support the protection and enhancement of significant woodlands, through land use policy?</p> <ul style="list-style-type: none"> • In addition to size criteria currently provided in Section 227 of the ROP (2019), qualitative data should also be considered to determine woodland Significance. • Woodlands containing ELC polygons consisting of predominantly invasive species (e.g., black locust) should not meet criteria for significance. • Woodlands containing ELC polygons consisting of mostly dead trees infested with emerald ash borer (or other diseases) should rely on the results of additional wildlife and environmental studies in order to identify the biological value provided by the feature in order to determine if the feature meets criteria for significance. It is acknowledged that dead trees provide some ecological value, however we request that this be assessed on a site-by-site basis. <p>10. Are there any additional considerations or trends that Halton Region should review in terms of the Natural Heritage component of the ROP?</p> <ul style="list-style-type: none"> • To improve transparency in available mapping the Region should provide separate layers to identify Linkages, Buffers, and Enhancement Areas in the updated NHS. • It is unclear how layers for Linkages, Enhancement Areas, and Buffers were reviewed during QA/QC evaluations of the draft 2019 NHS. Please provide additional details to confirm. • It is understood that the Region has applied a 30 m buffer to Key Features identified within the draft NHS. Little information is provided as to how Linkages and Enhancement Areas have been determined in the 2020 NHS discussion paper, the March 2020 Memo for the Quality Assurance/Quality Control Process of the draft 2019 Regional NHS, or in the May, 2020 Mapping Audit Technical Memo. Please provide further details on these items and provide separate mapping layers to independently delineate these items. • Refer to comments on Linkages, Buffers and Enhancement Areas in the attached memo. <p>Appendix B Relevant Excerpts from Policy Planning Documents</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: right;">North-South Environmental Inc. <i>Specialists in Sustainable Landscape Planning</i></p> <p>Figure 3. Conceptual Map of NHS Development Step 3. Identify Ecological Linkages and Buffers</p>  <p><i>Sustainable Halton Phase 3 Report 3.02 - Natural Heritage System Definition and Implementation</i> <i>April 7th, 2009</i> <i>page 8</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
32.	9259 Fifth 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 9259 Fifth Line Lot 7, Concession VI (Esquesing) Town of Halton Hills</p> <p>I have been retained by Erkki Laakkonen 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 9259 Fifth Line in the Town of Halton Hills (Subject Lands).</p> <p><u>ROPA 38 Natural Heritage System (RNHS) Limits</u></p>	<p>Regional Planning staff have reviewed the submission, which included the following recommendations: (1) that the Growth Plan Natural Heritage System (NHS) along the 'Y' linkage connection through the subject lands be removed; and (2) That the Region and Conservation Halton (CH) conduct a site visit to examine regulated areas, including watercourse and wetlands.</p> <p><u>Growth Plan Natural Heritage System</u></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>

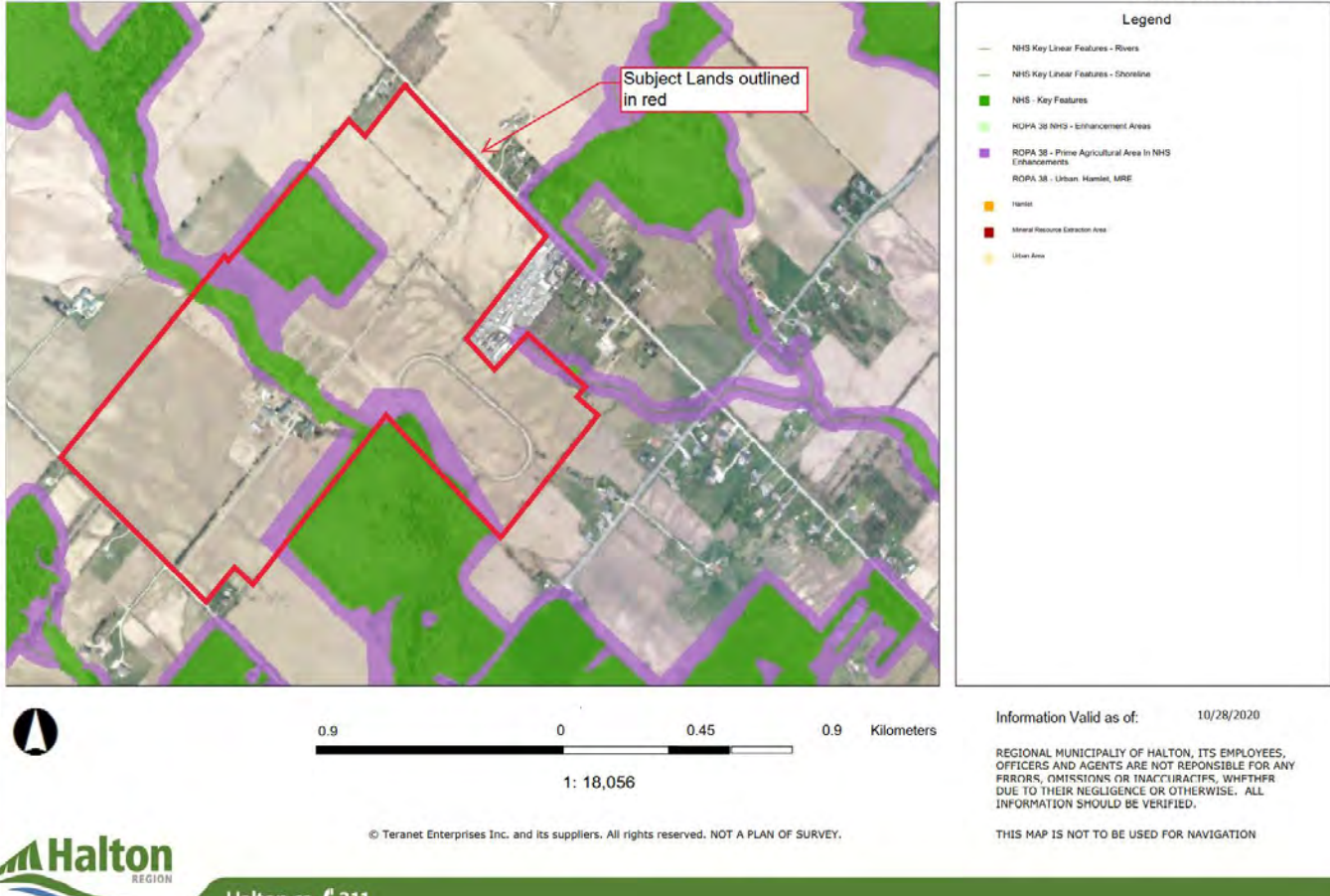
No.	Source	Submission	Response
		<p>The Subject Lands are located north of 5 Sideroad, on the east side of Fifth Line, as shown on Attachment 1 and contains two tributaries of Sixteen Mile Creek and a drainage feature associated with Sixteen Mile Creek. These drainage features, and their associated hazards 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) with the exception of two areas:</p> <ol style="list-style-type: none"> 1. The woodland in the north-central portion of the Subject Lands is only partially regulated by CH however, the entire woodland is within the RNHS; and, 2. CH has mapped a watercourse and associated wetland flowing out of the woodland in the northcentral portion of the Subject Lands that is not shown in the current RNHS mapping. <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 (Attachment 4). This increase is attributable to two changes:</p> <ol style="list-style-type: none"> 1. The addition of a 500m wide NHS corridor established through the Growth Plan; and, 2. The addition of a watercourse and associated flood plain flowing in a southerly direction from the woodland in the north-central portion of the Subject Lands to the southern property boundary. <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, as well as through the Subject Lands, and the eastern link does not connect to an NHS east of Trafalgar Road. The Subject Lands are within the southern 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</i></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> <p><u>Request for Refinements of Key Features</u></p> <p>Any refinements to the boundaries of significant wetlands and watercourses will require approval by the regulatory and/or provincial agency and these updates will need to be reflected accordingly in their respective mapping data for the boundaries of the significant wetlands and watercourse to be updated in the RNHS.</p> <p>Given that the watercourse and wetland are within Conservation Halton's (CH) regulatory jurisdiction, it is recommended that you contact CH if you require further information about the mapping on the Subject Lands. Please feel free to contact Charles Priddle, Manager – Regulations Program – at 905 336 1158 ext. 2276, or by email at cpriddle@hrca.on.ca. If you require assistance in coordinating with the Conservation Authority, please do not hesitate to reach out to us.</p> <p>Regional Planning Staff will be completing another update to the RNHS mapping as part of the next phase of the Regional Official Plan Review. The next mapping update includes the use of the most recent GIS data for regulated wetlands and watercourses from CH. More information on the next draft of the NHS mapping is anticipated to be completed in Stage 3 Phase 3 of the ROPR.</p>

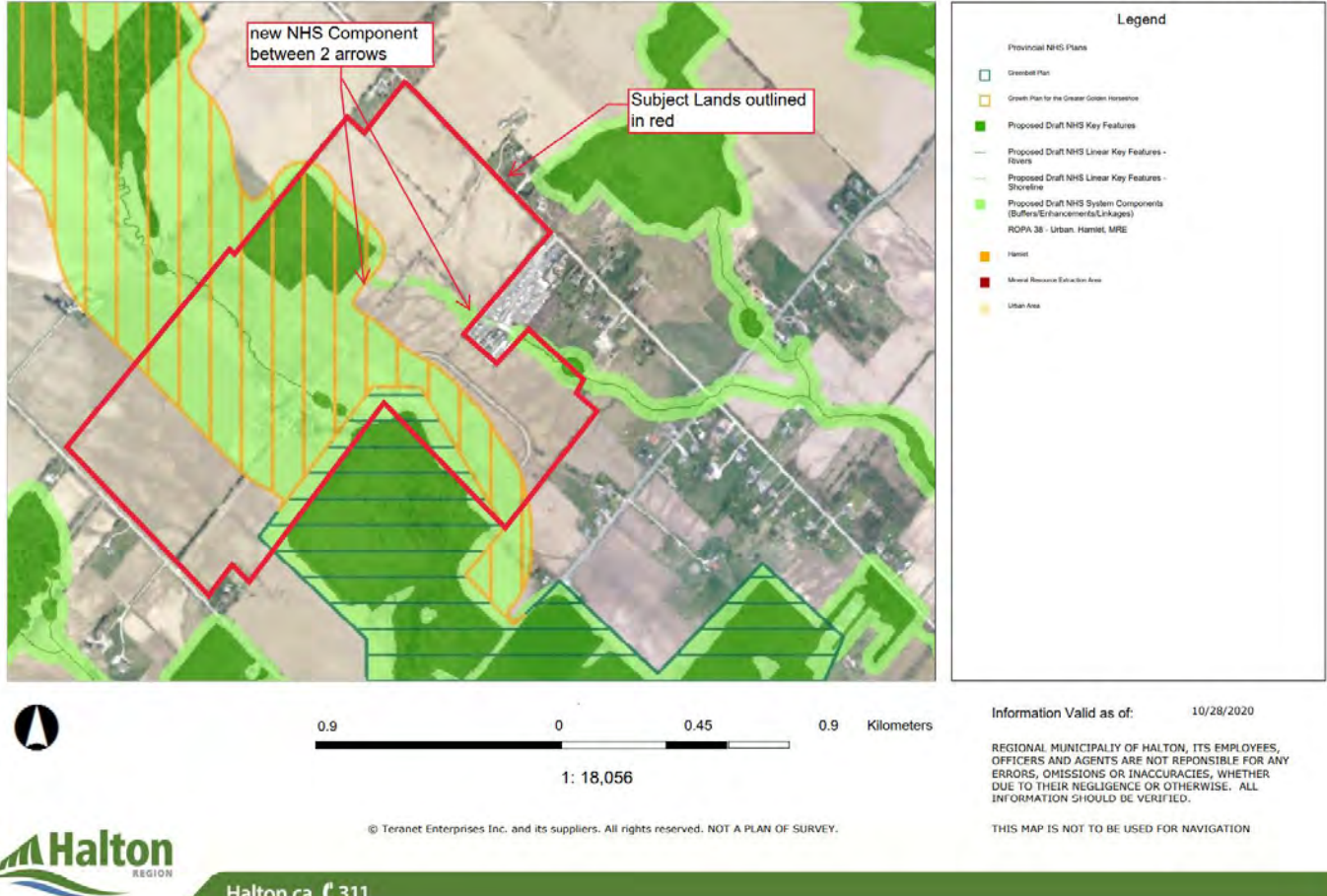
No.	Source	Submission	Response
		<p><i>bridge the large gap between natural features that the province's GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Region's Transportation Master Plan, will represent a barrier. Please 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 existing and more logical connection between the Greenbelt and Niagara Escarpment Plan 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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

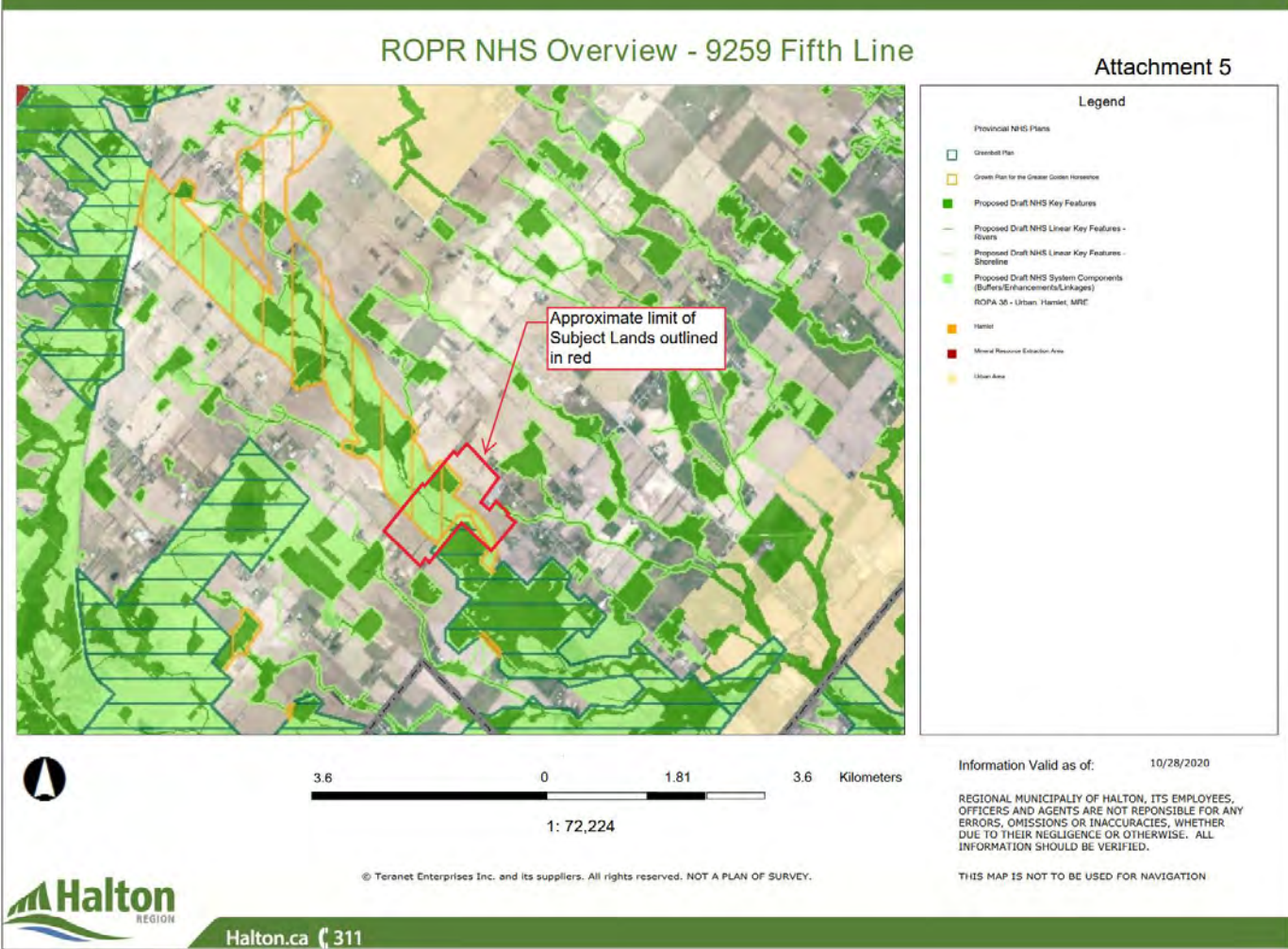
No.	Source	Submission	Response
		<p>the eastern link of the 'Y' connection does not provide for a connection to the Silver Creek watershed to the east, the entire intent of the 'Y' connection is called into question. The northern link of the 'Y' connection, north of 10 Sideroad, contains extremely limited 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>NHS Component</u></p> <p>As mentioned above, in addition to the 500m Growth Plan NHS corridor through the Subject Lands, Conservation Halton has identified a watercourse and associated flood plain on the eastern portion of the property which has been added as an NHS Component in the proposed ROPR RNHS mapping. It is respectfully requested that the Region and CH review the addition of this area to the RNHS. Historically, CH has not identified features as watercourses and/or mapped flood plains along features that have less than a 50 ha upstream drainage area. Prior to adding this constraint to the Subject Lands the Region and CH should attend on-site to review the feature and determine whether it meets the definition of watercourse in the <i>Conservation Authorities Act</i> and, if not, the feature and associated flood plain should be removed from the proposed ROPR RNHS.</p> <p>It is noted that, based on air photo interpretation, this drainage feature is piped through the property immediately to the south (9198 Sixth Line) (Attachment 2).</p> <p><u>Recommendation</u></p> <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, as well as the Subject Lands, contains extremely limited natural heritage features. Such a recommendation is in-keeping with the Regional and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>In addition, it is respectfully requested that the Region and Conservation Halton attend on-site to review the NHS Component that is proposed for addition on the eastern portion of the property to determine whether it has been appropriately identified by Conservation Halton as a regulated watercourse.</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="655 782 1951 1776" style="border: 1px solid black; padding: 5px;"> <p style="text-align: right;">Attachment 1</p> <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">  <p>TOWN OF HALTON HILLS <i>Working Together Working for You!</i></p> </div> <div style="text-align: center;"> <p>9259 Fifth Line Halton Hills</p> </div> </div>  <div style="border: 1px solid black; padding: 5px; margin-top: 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="margin-top: 5px;"> <p>Notes</p> </div> <div style="display: flex; justify-content: space-between; align-items: center; margin-top: 5px;"> <div style="text-align: center;">  <p>0 0.75 1.5 Kilometers</p> </div> <div style="font-size: small;"> <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> </div> </div> <div style="font-size: x-small; margin-top: 5px;"> <p>Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere Scale: 1:29,650 © The Corporation of The Town of Halton Hills Date: 10/28/2020</p> </div> </div>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">Conservation Halton Regulations Mapping Attachment 2</p> <p style="text-align: center;">10/28/2020, 4:43:27 PM</p> <p>1:18,056</p> <p>0 0.1 0.2 0.4 mi</p> <p>0 0.17 0.35 0.7 km</p> <p>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</p> <p style="text-align: right;">Conservation Halton, 2020 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;">ROPA 38 NHS - 9259 Fifth Line Halton Hills</p> <p style="text-align: right;">Attachment 3</p>  <p>The map displays an aerial view of the area around 9259 Fifth Line in Halton Hills. A red outline highlights the 'Subject Lands'. The map is overlaid with various planning zones: green for Key Features, purple for ROPA 38 NHS Enhancement Areas, and yellow for Urban Areas. A legend on the right side of the map provides a key for these features. Below the map is a scale bar (0 to 0.9 Kilometers) and a north arrow. The Halton Region logo and website information (Halton.ca 311) are at the bottom left. A disclaimer at the bottom right states: '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, WHATEVER 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;">ROPR Proposed RNHS - 9259 Fifth Line Halton Hills Attachment 4</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p style="text-align: center;">ROPR NHS Overview - 9259 Fifth Line</p> <p style="text-align: right;">Attachment 5</p> <p style="text-align: center;">Approximate limit of Subject Lands outlined in red</p> <p style="text-align: center;">1: 72,224</p> <p style="text-align: center;">© Terenet Enterprises Inc. and its suppliers. All rights reserved. NOT A PLAN OF SURVEY.</p> <p style="text-align: center;">Halton REGION Halton.ca 311</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
33.	Evergreen Community (Burlington) Limited	<p>Attached per email dated 2020-10-30 (Wood Bull LLP)</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>Wood Bull LLP has been municipal planning counsel to Evergreen Community (Burlington) Limited since 2006. We have been integrally involved in all of the planning processes in regard to our client’s property located within an area now known as the Tremaine-Dundas Secondary Planning Area, in particular as to its appeal to the Ontario Municipal Board (the “Board”) of the mapping of the Regional Natural Heritage System (RNHS) on its property in the Planning Area.</p> <p>Purpose of Submission</p> <p>Our client has requested that we make this submission to you in regard to commentary contained in the documents entitled <i>Best Practices Review Technical Memo</i> (Gladki <i>et al.</i>, 2020b) and <i>Background Review Technical Memo</i> (Gladki <i>et al.</i>, 2020a) in regard to the decision of the Board respecting Evergreen’s appeal respecting the appropriateness of the RNHS boundaries for the Evergreen property (PL111358, April; 6, 2016) (the “Evergreen Decision”).</p>	<p>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 3rd Regional Official Plan Amendment during Phase 3 of the ROPR.</p> <p>Further, the reference to the OMB decision related to the Evergreen ROPA 38 appeal (PL111358 – April 6, 2016) was intended to illustrate the appropriateness of a 30 m buffer at a regional scale. Regional staff fully acknowledge that ROP s.116.1 is the appropriate process to refine the RNHS, including buffers. Through the comprehensive Environmental Implementation Report (EIR) and Functional Servicing Study (FSS) in support of their appealed Zoning By-law Amendment and Draft Plan of Subdivision applications, which includes detailed</p>

No.	Source	Submission	Response
		<p>The Gladki commentaries reflect a fundamental misunderstanding of the basis of the appeal as well as the Board's decision and, if accepted, will lead to an approach to buffers in the Region which is inconsistent with (1) current policies in the Regional Official Plan ("ROP") which underlay the Evergreen Decision, and (2) Burlington OPA 107 for the Tremaine-Dundas Secondary Planning Area which was approved by the Region in May 2019.</p> <p>Request Based on the information below, we respectfully request that the Region:</p> <ol style="list-style-type: none"> 1. request the consultant to revise its commentaries to take into consideration our comments above to ensure that this erroneous interpretation does not gain credibility by force of being in the public realm unchanged; 2. confirm that policy 116.1 and the definition of buffer in the ROP represent an appropriate approach to RNHS boundary determination; and 3. recognize the mapping adjustments to Key Features boundaries settled through the Evergreen OMB process as well as the subsequently staked Key Feature boundaries incorporated into the approved OPA 107 (all as discussed in the letter dated 30 October 2020 submitted to you by Beacon related to the Evergreen lands). <p>Relevant ROP Policies re Buffers</p> <p>The Evergreen Decision must be understood in the context of the ROP approach to buffers.</p> <p>What is a "buffer"? The ROP defines it as follows:</p> <p><i>220.1.1 BUFFER means an area of land located adjacent to Key Features or watercourses and usually bordering lands that are subject to development or site alteration. The purpose of the buffer is to protect the features and ecological functions of the Regional Natural Heritage System by mitigating impacts of the proposed development or site alteration. <u>The extent of the buffer and activities that may be permitted within it shall be based on the sensitivity and significance of the Key Features and watercourses and their contribution to the long term ecological functions of the Regional Natural Heritage System as determined through a Sub-watershed Study, an Environmental Impact Assessment or similar studies that examine a sufficiently large area</u> [underlining added]</i></p> <p>This definition indicates that the extent (width) of the buffer will be variable according to the "sensitivity and significance" of the features which it is intended to protect. The extent of the buffer and what can occur within it is to be determined by study; not predetermined for all time before such studies are carried out.</p> <p>Next, s. 116.1 of the ROP confirms this approach as follows:</p> <p><i>116.1 The boundaries of the Regional Natural Heritage System may be <u>refined, with additions, deletions and/or boundary adjustments,</u> through:</i></p>	<p>assessments for RNHS boundary refinements including buffer widths. Should these additional refinements be approved through the approval of the Planning Act applications, these refinements will be in effect on the date of such approval (as per ROP s.116.1). For the purpose of the ROPR draft refine RNHS, only refinements approved through Planning Act approvals will be included in any updates to ROP Maps 1 and 1G.</p>

No.	Source	Submission	Response
		<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.</i></p> <p><i>Once approved <u>through an approval process under the Planning Act</u>, 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. [underlining added]</i></p> <p>Clearly, the ROP anticipates that boundary adjustments to buffer boundaries in RNHS mapping will occur on the basis of a justification provided in one of the named studies in the context of “<i>approval processes under the Planning Act</i>” (which include local planning processes such as Secondary Plans, plans of subdivision and zoning by-laws). There is no limitation on the extent of the adjustment which might be made through this process.</p> <p>The Evergreen Decision</p> <p>The Evergreen Decision resulted from Evergreen’s appeal of the RNHS mapping on its property. The reason that the decision focuses on buffers is that, prior to the hearing, issues related to refinement of Key Features (both Significant Wetlands and Significant Woodlands) and linkages were resolved, subject to minor refinements to be based on feature staking in the field (which was subsequently done). These boundary adjustments have not been incorporated into the RNHS maps for the Evergreen property being used by staff in the present consultative process.</p> <p>The following are the salient features of the hearing and decision related to buffers:</p> <ul style="list-style-type: none"> • The hearing involved a contest as to whether it was appropriate to include a 30m buffer distance around Significant Woodlands in the ROP mapping for the Evergreen property, given the extensive natural heritage analysis which consultants to Evergreen had already carried out and despite the fact that the ROP contained no policy language prescribing a 30 m buffer – precautionary or otherwise – at the ROP level. • Evergreen took the position that if a buffer was to be established, it should be guided by a detailed site specific analysis of the type required by the definition of “buffer” in the ROP (220.1.1) through one of the study processes identified in s.116.1 of the Regional Plan. Evergreen submitted it had already carried out such a study to support its suggested buffer distance of 10 m. • The Regional witness (Mirek Sharp) acknowledged that buffer distances should be established based upon site specific information as to Key Features being protected and the nature of the adjacent land use; however, since Evergreen did not have a development application in process, there was no land use to study. In this case, he supported a 30 m precautionary buffer which could be refined later through the Regional Official Plan s.116.1 process as part of the development approval process of the Evergreen lands. As noted in the Evergreen Decision: 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> ○ <i>[21] ..., the Region's Ecologist, Mr. Sharp agreed with Evergreen's Ecologist wherein Mr. Ursic opined that the extent of the buffer to be applied to features outside the Greenbelt Plan Area should be applied in a manner that considers both the intrinsic ecological sensitivities of a feature as well as the ability to mitigate potential impacts anticipated from a change in adjacent land uses on a sitespecific basis.</i> ○ <i>[22] Mr. Sharp's comment was that because there was "no application for development on the Evergreen lands and the adjacent lands [sic] uses have not been agreed on. It is mainly because of this [he had] the opinion that finalizing the buffer widths is pre-mature at this time." [Exhibit 278, page 3, para. 5]</i> • The OMB accepted the evidence of Mr. Sharp that a 30 m buffer was appropriate on the basis that it was a precautionary distance (the OMB used the term "cautious approach") and that the 30 m distance could be refined as contemplated by s. 116.1 of the ROP during the Evergreen development process (which approach is also consistent with the definition of "buffer" in the Regional Plan). • As the Board noted: <ul style="list-style-type: none"> ○ <i>[17] The next step is to ensure adequacy of those components. I cannot forget that the matter before me is mapping at a regional level. For buffers, adequacy, taking Mr. Ursic's evidence, means not only widths of buffers but also other mitigation measures which could be used. And I agree with Mr. Ursic that such measures and specifically the necessary buffer width could be addressed at the local level when development applications are filed.</i> ○ <i>[18] However, the refining process is captured through policy 116.1 which the Board has already approved. That policy exists for the very purpose to refining the boundaries of the Regional Natural Heritage System, which system includes buffers as a component.</i> • In this context, the Board relied upon the fact that the Region had accepted buffers of less than 30 m on the Evergreen property. As noted in the decision: <ul style="list-style-type: none"> ○ <i>[34] By recognizing a 30 m buffer, the Region is applying a consistent approach which does not unduly prejudice Evergreen from taking advantage of policy 116.1. In fact, the buffers originally identified for the wetland and watercourses were reduced from 30 m to 15 m, indicative of the flexibility available to Evergreen. The same was true for the relocation of tributary 14W-17Cb located in the southeastern quadrant of the subject lands.</i> ○ <i>[31] If a 10 m buffer for the woodland features on the Evergreen property is indeed appropriate, then that will be borne out through future processes available to Evergreen at the local level as well as pursuant to the flexibility provided through policy 116.1 of ROPA 38.</i> • The Board did not determine that a 30 m buffer <i>per se</i> was a proper planning buffer; rather it indicated that there was considerable flexibility available to Evergreen in addressing an appropriate buffer distance through the study process called for by s.116.1. <p>Burlington OPA 107</p> <p>Following the release of the Evergreen Decision, an update to the Tremaine Dundas Secondary Plan Subwatershed Study was completed (at the Region's request) in May 2018 and was followed by</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>completion of the Tremaine Dundas Secondary Plan and the adoption by the City of Burlington of OPA 107 which was subsequently modified and approved by the Region in May 2019.</p> <p>OPA 107 contains the following policies regarding buffer boundaries:</p> <p style="text-align: center;">6.5 Natural Heritage System -Tremaine Dundas Community</p> <p style="text-align: center;">6.5.2 Policies</p> <p><i>h) The boundaries of the Natural Heritage System as identified in the Tremaine Dundas Secondary Plan Subwatershed Study Update, May 2018, may be refined with additions, deletions and/or boundary adjustments through a future Environmental Impact Assessment (EIA) or similar study completed to the satisfaction of the City, Region and where appropriate Conservation Halton. Once such refinements have been approved through an approval process under The Planning Act, these refinements shall be in effect on the date of such approval. The Region and City will maintain mapping showing such refinements and incorporate them as part of the City's statutory review of the Official Plan.</i></p> <p><i>i) Buffer refinements for the Tremaine Dundas Secondary Plan are to be implemented using a science-based approach by:</i></p> <ul style="list-style-type: none"> <i>(i) recognizing the buffers applied to Key Natural Features applied at the Regional scale in the Regional Official Plan and as carried forward through the Subwatershed Study Update (May, 2018);</i> <i>(ii) following an approach that is consistent with the policies of the City, Region of Halton, Conservation Authority and Province, and the findings of Municipal Board in its decision dated April 6, 2016, PL111358 and consistent with the risk-based approach and steps described in the Region's Buffer Refinement Framework to be used as the foundation for the refinement process;</i> <i>(iii) recognizing Key Feature and watercourse sensitivity and significance and their contribution to the long term ecological functions of the Regional Natural Heritage System;</i> <i>(iv) considering the nature and scope of the proposed adjacent land use, and any measures intended to improve and enhance buffer function.</i> <p>A fair reading of this 2019 Region-approved official plan policy is that it implements s.116.1 (and the definition of "buffer") of the ROP and anticipates refinements to the mapping of buffers in the RNHS based upon further study as part of "approval processes under the Planning Act".</p> <p>The Gladki et al. Commentaries</p> <p>First Commentary</p> <p>The <i>Best Practices Review Technical Memo</i> (Gladki et al., 2020b) states the following:</p> <p><i>In the Ontario Municipal Board (OMB) decision for the "Evergreen" application, (Case No(s). PL111358, 110857, and 091166 - see section 4.0 in the Background Review Technical Memo for more details), the Board considered an appeal to the Region's 30 m buffers for significant woodlands. The appeal was unsuccessful and the requirement for a 30 m buffer was upheld at the Secondary Plan stage, pending detailed field studies which were to address buffer width adequacy. The Board's decision to dismiss the appeal for reducing buffer widths supports the</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>Region's position regarding the need for certainty that the natural heritage features and functions are protected for future generations. (p. 29, Gladki et al., 2020b)</i></p> <p>This commentary should be read against the backdrop of the in-force ROP policies and the interpretation of those policies, in particular s.116.1, by the Board in the Evergreen Decision. However, the commentary does not mention s.116.1 or the definition of "buffer" in the ROP.</p> <p>Because it ignores the importance of s.116.1, the commentary fundamentally errs in asserting that the Evergreen Decision "<i>supports the Region's position regarding the need for certainty...</i>" The truth of the matter could not be farther from this statement. The Evergreen Decision embraces the policy of s.116.1 (and the definition of "buffer") that the final boundary (i.e., the certainty of a width of a buffer) is to be determined by site specific study on the basis of an actual proposed land use and the actual characteristics of the Key Feature, etc.</p> <p>In summary, it is the study which determines the nature of the final buffer (and /or other management tools) required to protect natural heritage features and functions for future generations; not the assignment of an arbitrary precautionary width without regard to the circumstances on the ground. The result of the study then gets embodied in Regional mapping (without the need for a ROPA) and helps to provide certainty.</p> <p>Second Commentary The <i>Best Practices Review Technical Memo</i> (Gladki et al., 2020b) includes a second erroneous statement that asserts the Evergreen Decision somehow supports the application of 30 m buffers outside settlement areas:</p> <p><i>The 30 m buffer mapped in the non-urban areas of Halton's RNHS is appropriate when viewed in the context of providing certainty. This buffer approach was supported by the Evergreen OMB decision." (p.33, Gladki et al., 2020b)</i></p> <p>These two statements fail to distinguish between (a) the 30 m vegetation protection zones required adjacent to some (but not all) Key Features by the Province outside of settlement areas and (b) buffers that are finally determined within settlement areas in accordance with policy s.116.1.</p> <p>The Gladki concept of "certainty" in the context of 30 m buffers is misleading if it is intended to connote that the 30 m buffer is a final end point. The Evergreen Decision does not support this view. At best, within a settlement area, the 30 m buffer is a precautionary buffer until such time as one of the studies mentioned in s.116.1 demonstrates the extent to which the buffer boundary should be "adjusted".</p> <p>Third Commentary</p> <p>The Evergreen Decision is described in the <i>Background Review Technical Memo</i> (Gladki et al., 2020a) in the table summarizing all OMB decisions relevant to the ROPR as follows:</p> <p><i>091166, 111358, 110857 Decision Evergreen (6 April 2016)</i></p> <p><i>This hearing involved the extent of key features, buffers, linkages and enhancements for a proposed development. It was agreed that there was no need to amend Map 1 or 1G as minor refinements would be accommodated through edge staking, etc. Buffer width was a major issues relating to the RNHS.</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>The issue of buffers is one to be addressed in the ROPR and the Board's decision on this file to dismiss the appeal supports the Region's position. <u>The existing policy could be refined to better reflect the Region's position on buffers, as reflected in this decision.</u></i></p> <p><i>... The Board's reasoning on buffers, especially paragraphs 15-34, should be reviewed as part of the policy review with respect to buffers. [underlining added]</i></p> <p>This commentary, in particular the underlined language, indicates a profound misunderstanding of the Evergreen Decision.</p> <p>The Evergreen Decision is supportive of the flexibility that exists within the existing policy framework in the ROP regarding RNHS boundaries, in particular with respect to the final determination of boundaries found in s.116.1. As illustrated in our comments above, there is nothing in the decision which suggests a need for a refinement "to better reflect the Region's position on buffers".</p> <p>Request</p> <p>Based on the information above, we respectfully request that the Region:</p> <ol style="list-style-type: none"> 1. request the consultant to revise its commentaries to take into consideration our comments above to ensure that this erroneous interpretation does not gain credibility by force of being in the public realm unchanged; 2. confirm that policy 116.1 and the definition of buffer in the ROP represent an appropriate approach to RNHS boundary determination; and 3. recognize the mapping adjustments to Key Features boundaries settled through the Evergreen OMB process as well as the subsequently staked Key Feature boundaries incorporated into the approved OPA 107 (all as discussed in the letter dated 30 October 2020 submitted to you by Beacon related to the Evergreen lands). <p>We are appreciative of the opportunity to provide comments on behalf of our client.</p> <p>We look forward to the Region's responses to our comments and requests.</p> <p>Please do not hesitate to contact us if clarification or additional information is required.</p> <p>Yours very truly, Wood Bull LLP Dennis H. Wood</p> <p>Attached per email dated 2020-11-20 (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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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. • 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. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • 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); 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 3. 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>Attached per above email dated 2020-10-30 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 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • 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>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>Comments are acknowledged. Please see above for a detailed response.</p>

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		<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 • 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 (2017)</i> 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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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"> 4. 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); 5. 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 6. 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</p> <p>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 (2 0 2 0)</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
		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	Comments are acknowledged. Please see above for a detailed response.

Ex. 273

Agreed Statement

To: Ontario Municipal Board

From: Ken Ursic and Mirek Sharp

Date: June 4, 2015

Ref: OMB File No. PL111358, Evergreen Community (Burlington) Ltd. [Evergreen Appeal]

Re: **Natural Heritage Meeting of Experts**

Points of Agreement / Disagreement from Experts Meeting / Site Visit – June 3, 2015

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.

The meeting was held on the Evergreen site on June 3rd between 1 pm to 4 pm. The purpose of the meeting was to:

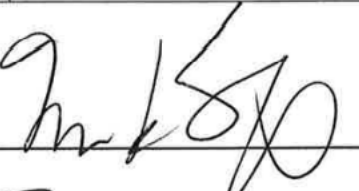

1. provide Mr. Sharp with an opportunity to review the site features;
2. to review the boundaries of features, enhancements and linkages for the purpose of considering refinements to Maps 1 and 1G in ROPA 38;
3. articulate points of agreement and disagreement with the intent of narrowing the issues for the benefit of the Board.


We agree that:



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.

The route walked is illustrated on the attached Site Walk Route map (Schedule A).

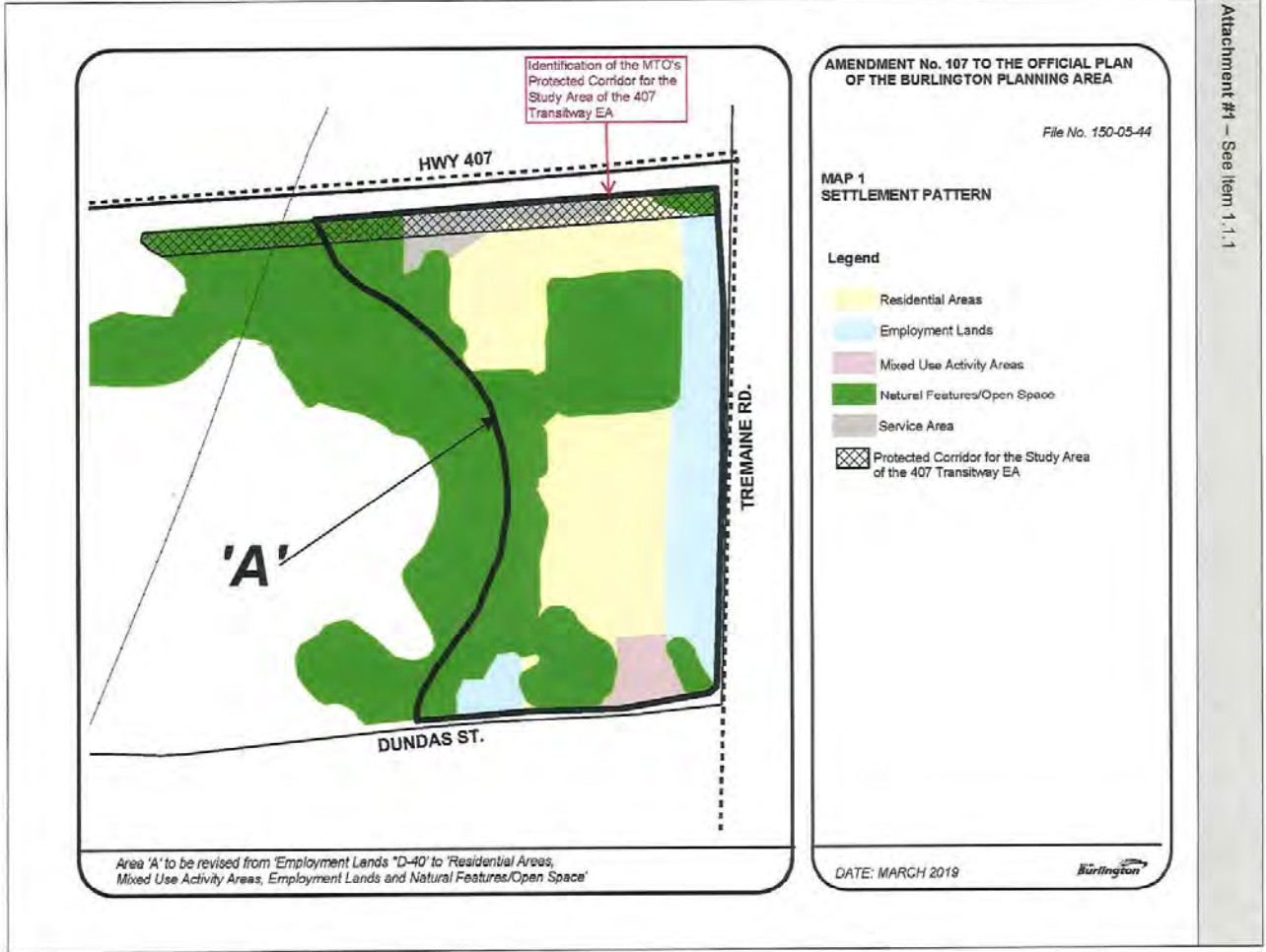
Comments are acknowledged. Please see above for a detailed response.

No.	Source	Submission	Response										
		<p>The following table summarizes points of agreement and disagreement from this meeting.</p> <table border="1" data-bbox="699 312 1808 1320"> <tr> <td data-bbox="699 312 988 701">1. Key Features</td> <td data-bbox="988 312 1808 701"> <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="699 701 988 1018">2. Watercourses (as per ROPA 38 115.3(5)) and Wetlands (as per ROPA 38 115.3(6))</td> <td data-bbox="988 701 1808 1018"> <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. 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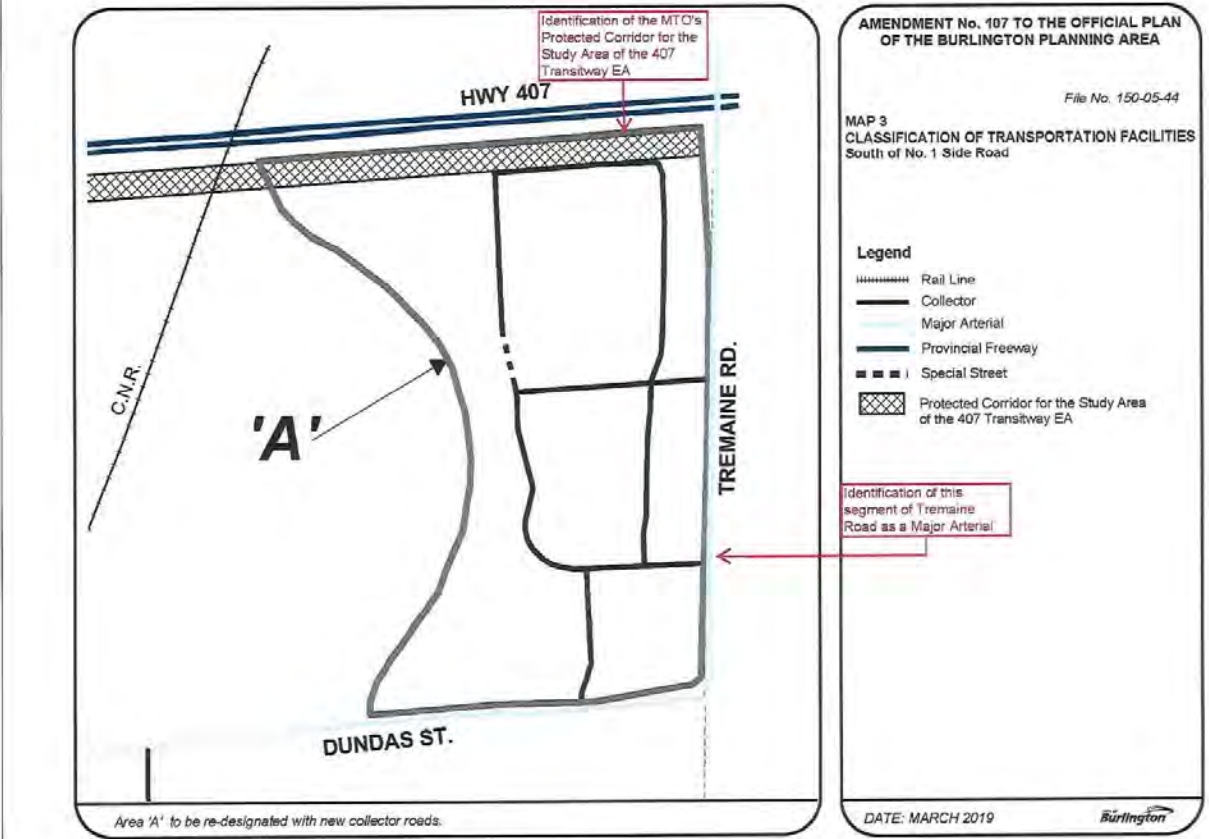
No.	Source	Submission	Response
		 <p data-bbox="646 614 677 756">SCHEDULE A</p> <p data-bbox="1911 635 1958 1058">SITE WALK ROUTE (JUNE 3, 2015)</p> <p data-bbox="1849 252 1911 433"> <small>Graphic developed by Evergreen County Assessor's Office for the purpose of the Evergreen County Assessor's Office report on the Evergreen County Assessor's Office report on the Evergreen County Assessor's Office</small> </p> <p data-bbox="1849 887 1911 1028"> <small>Evergreen Property Boundary Site Walk Route Greenbelt Limit (Approximate)</small> </p>	<p data-bbox="1982 282 2781 352">Comments are acknowledged. Please see above for a detailed response.</p>

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

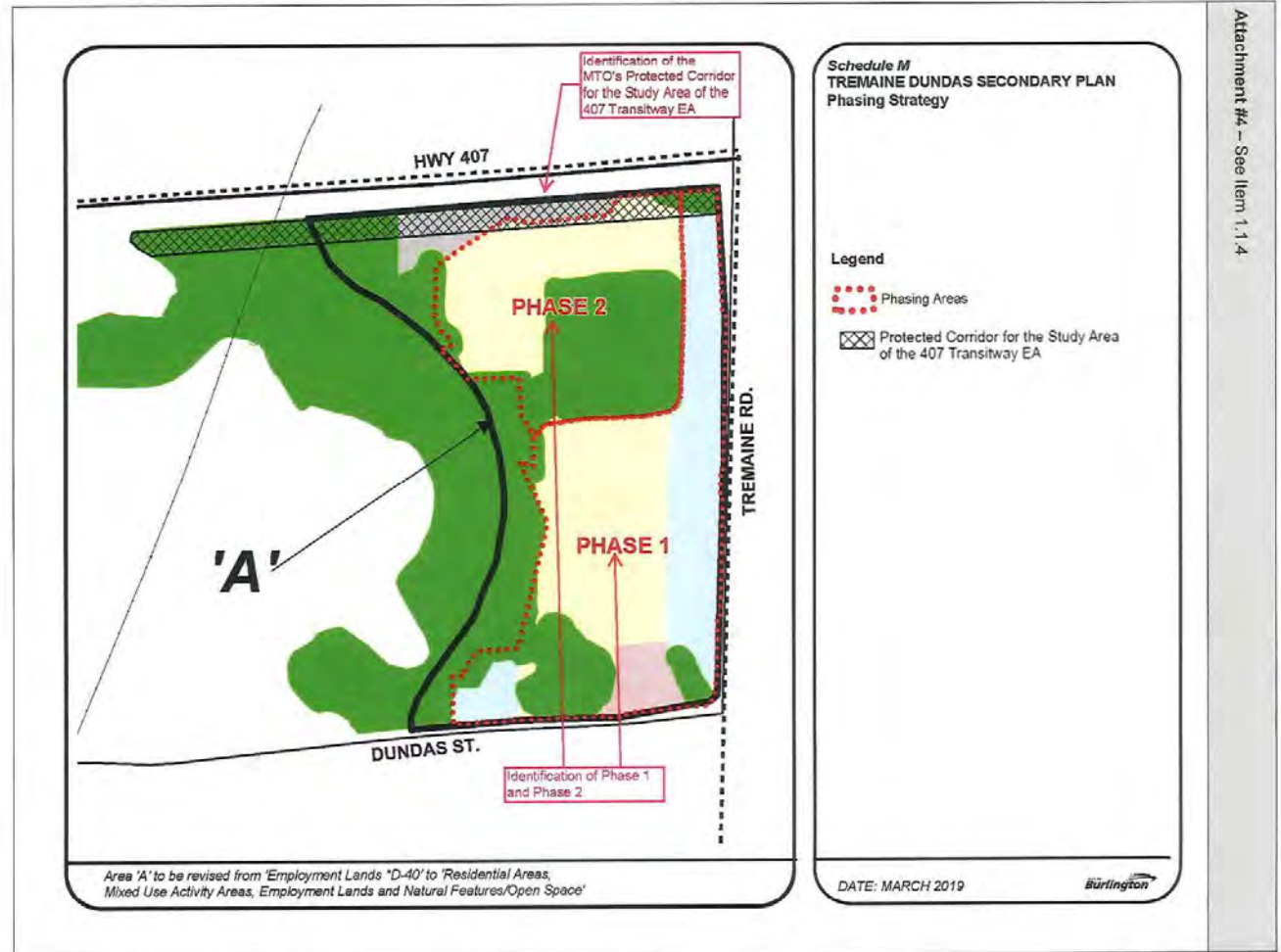
No.	Source	Submission	Response
			<p>Comments are acknowledged. Please see above for a detailed response.</p>

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>Page 15 of 18</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<div style="display: flex; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg); font-size: small; margin-right: 10px;">Page 16 of 18</div> <div style="border: 1px solid black; padding: 10px; width: 100%;"> <p style="font-size: x-small; margin-top: 5px;">AMENDMENT No. 107 TO THE OFFICIAL PLAN OF THE BURLINGTON PLANNING AREA File No. 150-05-44</p> <p style="font-size: x-small; margin-top: 5px;">MAP 2 COMPREHENSIVE LAND USE PLAN- URBAN PLANNING AREA</p> <p style="font-size: x-small; margin-top: 5px;">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 style="writing-mode: vertical-rl; font-size: x-small; margin-left: 10px;">Attachment #2 - See Item 1.1.2</div> </div>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="655 1054 686 1161" style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 17 of 18</p> 	<p data-bbox="1908 258 1939 499" style="writing-mode: vertical-rl; transform: rotate(180deg);">Attachment #3 - See Item 1.1.3</p> <p data-bbox="1982 284 2769 344">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
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**Attachment D:
Agreement on Approach to Buffers for
the Evergreen Site with the Region
(July 2019)**

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

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>

No.	Source	Submission	Response
		<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>


No.	Source	Submission	Response
		<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> <p>8. 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> <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> <p>9. APPLICATION OF THE MITIGATING FACTORS REFINEMENT TO “TOO HIGH” RISK SIGNIFICANT WOODLANDS: The Framework (p. 19) states that in cases where the Key Feature’s uncertainty ranking is “too high” the 5 m buffer reduction available in Step 2 where</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>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>10. 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>11. 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>


No.	Source	Submission	Response
		<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>12. 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>13. 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 being maintained for the majority of the significant woodland / Open Space / residential land use</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>interface and if all other buffer issues on the Evergreen lands were resolved to the Region's satisfaction.</p> <p>14. 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 Space, which is the appropriate consideration. However, a minor reduction to Framework-derived 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>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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(ELC Unit 15a west)		<i>or limited Table B-1 functions</i>						Agencies disagreed with proposed reduction of overall uncertainty ranking to "moderate" beside residential and range of 20 – 25 m.																																																																			
Deciduous Forest/Hedgerow (ELC Unit 15a west)	L' (Single-loaded Road/Special Road)	M (CUW with no or limited Table B-1 functions)	Low	-(5 – 10 m)	-(5 m)	None anticipated	15 - 20 m	Agreed to "moderate" Step 1.2 significance as long as the EIR-FSS is able to demonstrate the limited sensitivity of this unit with respect to wildlife habitat functions.																																																																			
Wetland (ELC Unit 22)	H (Residential – Med)	H (Significant Wetland)	Too High	None	None	Vegetated swale in buffer to convey seasonal flows eastward	30 m	CH agreed to grading within outer portion of buffer to accommodate headwater drainage features (HDF)/swales if EIR-FSS demonstrates no negative impacts																																																																			
Wetland (ELC Unit 22)	L' (Single-loaded Road)	H (Significant Wetland)	Moderate	-(0 – 5 m)	None	Vegetated swale in buffer to convey seasonal flows eastward	30 m	Agreed 30 m buffer to be retained on protected wetlands smaller than 2 ha unless screened under OWES. CH agreed to grading within outer portion of buffer to accommodate HDF/swales if EIR-FSS demonstrates no negative impacts.																																																																			
Cultural Woodlands (ELC Units 6, 8a)	H (Residential – Med)	M (CUW with limited Table B-1 functions)	High	None	-(5 m)	Vegetated swale in buffer to convey seasonal flows eastward	25 m	Agreed to "moderate" Step 1.2 significance as long as the EIR-FSS is able to demonstrate the limited sensitivity of this unit with respect to wildlife habitat functions. Agencies disagreed with proposed reduction of overall uncertainty ranking to "moderate" beside residential and range of 20 – 25 m.																																																																			
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34.	Halton Hills Climate Action	<p>Attached per email dated 2020-10-30</p> <p>Response to Halton Regional Official Plan Review – Climate Change Discussion Paper</p> <p>Halton Hills Climate Action is a citizen-led group formed in 2019 that focuses on climate change, and advocates for climate action by all levels of government as well as by people and businesses. Our actions have included ten rallies, petitions to upper levels of government, interviews with our MP and MPP, and climate action information e-newsletters to our mailing list of 300 subscribers.</p> <p>Halton Hills Climate Action believes that climate change and associated global warming pose the greatest hazard to natural systems and human health that humans have ever experienced.</p> <p>In 1959, when measurements of CO₂ in the atmosphere were first taken through sampling at the Mauna Loa volcano in Hawaii, CO₂ in the atmosphere stood at 315 ppm. That level was worrying to scientists. In 1988 NASA scientists first alerted the public to the fact that CO₂ had reached 350ppm which is about the upper safe level. The CO₂ level has now surpassed 415ppm. And it is still rising unabated with devastating effects around the globe. It was 1989 when Margaret Thatcher first sounded the alarm at the UN, leading to the Inter-governmental Panel on Climate Change and eventually the Paris Accord. And still, leaders dither.</p>	<p>In response, 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.</p> <p>Furthermore, 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-3), 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.</p>																																				

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		<p>Halton Hills declared a Climate Emergency on May 6, 2019 and Halton Region did likewise on Sept. 11, 2019. During COVID times the Climate Emergency has not gone away and the emissions have continued to climb.</p> <p>The updated Regional Official Plan will not only guide growth in the Region but will impact how the Region functions; how people and goods move, how homes are built and how much energy they use. It will impact the likelihood of flooding, the health of our forests, the resiliency of our electrical system, and the health of our people.</p> <p>When Halton Regional staff hosted a workshop with Dr. Dianne Saxe, former Environmental Commissioner of Ontario, she was asked what was the most important thing Halton Region could do to address climate change. The answer she gave was 'Land Use Planning'. The Regional Official Plan, as the overarching land use planning policy document, must utilize its power by making climate change mitigation and adaptation a consideration in all aspects of the plan. And it should go a step further by laying out goals for GHG emission reduction along with policies that result in meeting those goals.</p> <p>The Regional Official Plan should assist local municipalities reach their climate change goals. It is therefore important that the Region consult with the local municipalities regarding their strategies to address climate change mitigation. Local municipalities have been working on Green Development Standards and community energy plans. It would be helpful if the region could assist in harmonizing those standards across the region. A harmonized approach would be more attractive to developers and increase the level of compliance. By achieving a regional set of Green Development Standards the Region could then write into the OP goals for GHG emission reduction targets that matched the agreed upon Region-wide standards.</p> <p>There is an opportunity to make climate change mitigation a clear overarching objective in the preamble to the plan. It should be part of the vision statement. Previous plans have focused on accommodating and shaping growth. The new plan must still do those things but must also layer on top of that the need to grow in a new low-carbon regime.</p> <p>The low-carbon regime should then be explained as it not only reduces carbon emissions but also sequesters carbon.</p> <p>Sequestering carbon requires the region to consider the role of agriculture and how eco-friendly agricultural practices contribute to reaching our sequestration goals. Agriculture can be a significant carbon sink; just as significant as forests, and should be recognized as a partner in our community's efforts to rebalance emissions against sequestration as we strive to achieve a net-zero Halton.</p> <p>In order for agriculture to thrive, it needs investment. Investment is unlikely to occur if good agricultural land is owned by developers waiting for the urban boundaries to expand. Farmers rent the land and renters do not invest.</p> <p>The idea of permanence should be enshrined in the OP wherever it makes sense from an agricultural operation point of view. The flip side of this is the creation of hard boundaries on urban areas. The fact that the agricultural land is the easiest area to develop should not be the driving force. Sprawl is wasteful and undesirable for many reasons, but the most important reason comes back to climate change. Sprawl is simply too inefficient and should be discontinued.</p>	<p>More fulsome details are available 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>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>

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		<p>The issue of creating a hard urban boundary will be controversial but we must remember that all 4 local municipalities are going to hit the wall at some point. Burlington has already built out to its limits, one of which was artificially created by the Provincial Greenbelt. Somehow, Burlington has continued to grow and prosper thus illustrating that it is not a given that a boundary will result in stagnation. Oakville likewise can no longer expand its urban area but in this case it is still actively building on its last greenfield expansion. Milton and Halton Hills do, however, have room to push out their boundaries. In both cases the push would cause the conversion of productive farmland into urban uses including residential and employment uses.</p> <p>It would be useful to have scenario modelling undertaken for both Milton and Halton Hills to see both the economics and the physical shape each municipality would experience comparing urban expansion to maintaining current urban boundaries. This would give some facts to present to the public during consultations prior to Halton Hills and Milton taking a position on the issue.</p> <p>Regarding mapping of the Agricultural lands, they should be on map 1 with the Natural Heritage System shown as an overlay. Agriculture indicates a permitted use on the land whereas the Natural Heritage system is not a use but is rather a constraint. Also the exact mapping of the natural heritage system is reliant on opinion whereas the agricultural area is much easier to delineate.</p> <p>On the issue of increased density, it must be accommodated in our municipalities in order to grow without sprawl. However, the shape of a higher density community must be controlled in order to achieve livable, healthy communities. One such control relates to building height.</p> <p>Greater density can be achieved without depending on very high buildings but instead rely on many mid-rise buildings. Six storey buildings can provide people with a human scale built form that bears a relationship to the height of trees. Buildings of this height can be found scattered around through our cities where they have little impact on surrounding low density housing and yet they have a major impact on accommodating growth. When buildings are no taller than the tallest trees, over time they practically disappear from the streetscape. The core areas of European cities offer fine examples of human-scale buildings generally with retail on the ground floor. The point is to have more mid-level buildings and few if any tall buildings. The OP should add language that caps building height to 8 storeys and encourages residential buildings to be 6 storeys or less as a means of creating livable communities. This approach would allow for a gradual intensification in existing low density neighbourhoods. This should apply both within the existing urban boundary and in any approved greenfield expansion area.</p> <p>With increased density there is an opportunity to encourage 20 minute neighbourhoods. In the 20 minute neighbourhood a resident should be able to access all essential services within a 20 minute walk. This includes shopping for food, banks, services, schools, parks and natural areas. Neighbourhoods should be designed to be pedestrian and bike friendly with traffic calmed streets. Communities that embody this vision are healthier and use much less energy for heating, cooling and transportation.</p> <p>This vision for neighbourhoods is different from the simple intensification of transportation corridors. Focusing development along a highway or arterial road is good for loading up people on transit but runs the risk of not achieving other goals necessary to make a livable community. It is more difficult to make a linear community function well for all aspects of people's lives. High density, high traffic corridors are not quiet, pedestrian friendly streets but are meant first and foremost to facilitate the movement of vehicles.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>If high traffic corridors are put into the OP as desirable locations to focus density, it will be necessary to write into the plan additional language about pedestrian friendly amenities such as wider sidewalks , and increased standards for tree planting. Once again European cities illustrate how to distance the pedestrians from the traffic with double rows of trees and very wide sidewalks to accommodate outdoor cafes. Additional pocket parks and landscaping add to the ambiance necessary to separate the people from the traffic.</p> <p>In contrast to concentrating density along a corridor, density surrounding a transit hub or an existing urban centre can become a 20 minute neighbourhood as it can expand in all directions from the core. Traffic can diffuse away from the hub in many directions so that no one street carries the whole load. It provides an opportunity to create a core for people where shops and restaurants can spring up and a park is reachable within a 20 minute walk. Some examples:</p> <ul style="list-style-type: none"> • Examples of measures cities are using to create walkable neighbourhoods, including Ottawa https://www.strongtowns.org/journal/2019/9/6/7-rules-for-creating-15-minute-neighborhoods. • YouTube explanation 49 seconds: https://www.youtube.com/watch?v=1oYvbrDVjcY • Several cities are doing it https://steadystatemanchester.net/2019/11/20/the-future-is-20-minutes-away-20-minute-neighbourhoods/ • Portland and Melbourne https://www.domusweb.it/en/news/gallery/2020/09/16/the-20-minute-neighbourhood.html <p>In Conclusion Our main concern is Climate Change and we feel that many policies within the Official Plan play a role in reducing Halton’s GHG emissions and balancing sequestration of carbon. Those same policies have multiple benefits to the health and wellbeing of our residents and our economy.</p> <ul style="list-style-type: none"> • Our vision for Halton Region is that it restrains growth to existing urban areas and follows a path of human-scale density to achieve population targets and employment growth. • At the same time agriculture will continue to be a major contributor both to Halton’s economic health and its goal of carbon neutrality. Agriculture and the Natural Heritage System are twin pillars in meeting our need to sequester carbon and both should be protected and encouraged to flourish through policies in the Official Plan. • In order to tackle the difficult task of reducing Halton’s greenhouse gas emissions Halton should bring together the local municipalities to discuss harmonized Green Development Standards which would support reaching their emission reduction targets. GHG emission reduction targets should be added to the OP. • Livability should be the cornerstone of all new growth in Halton Region. It is totally consistent with the Climate Change imperative that we limit sprawl, limit tall buildings, encourage mid-rise buildings and focus on hubs to meet our growth goals. The Region should add language to the OP that encourages 20 minute neighbourhoods which will reduce trips, encourage active transportation, offer health benefits to the residents while reducing GHG emissions. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>This vision for Halton is one that responds to the Climate Change Emergency with positive measures to both act responsibly by taking action to reduce GHG emissions and address carbon sequestration to move towards carbon neutrality.</p> <p>Respectfully submitted by: Janet Duval Co-Chair HHCA and Jane Fogal Co-Chair HHCA</p>	
35.	Highmeadow Place Holdings Inc	<p>Attached per email dated 2020-10-30 (Paul Brown)</p> <p>RE: Regional Official Plan Review Highmeadow Place Holdings Inc. 8501 Esquesing Line Town of Milton</p> <p>Paul Brown and Associates Inc. is a consultant to Highmeadow Place Holdings Inc. who own multiple parcels of land in the Town of Milton (the Town), Regional Municipality of Halton (the Region).</p> <p>We are writing to you specifically related to a parcel located at 8501 Esquesing Line, Town of Milton comprised of 102 acres (subject lands) and a surrounding land assembly of approximately 750 hectares. Please refer to the attached figure for location and context reference.</p> <p>The subject and surrounding lands are located immediately northeast and adjacent to the Highpoint Industrial Secondary Plan and are coincident with the Town's current urban boundary. The subject lands are zoned Agricultural and are partially constrained by the Provincial Greenbelt, regulated tributaries of the East Branch of the Sixteen Mile Creek and Infrastructure Ontario (Hydro) corridor lands.</p> <p>We have been requested to review and provide comments on behalf of our client to questions that are pertinent and specific to their lands and the additional surrounding lands; on four of five discussion papers recently issued by the Region as part of the Regional Official Plan Review plus the Regions 2017 Development Charges Water/Wastewater Report and the Regions 2031 Master Transportation Plan, all to demonstrate and support the merit and benefits of including our clients and the surrounding lands in the next Urban Boundary Expansion.</p> <p>The following submission provides our comments on questions raised in four of the Regions Discussion Papers: Natural Heritage, Climate Change, Rural and Agricultural and Regional Urban Structure as well as the Regions 2017 Development Charges Water/Wastewater Report and 2031 Master Transportation Plan.</p> <p>OVERVIEW</p> <p>Through the Region Official Plan Review (ROPR), the Region is updating their Official Plan (OP) 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 released five Discussion Papers as part of their ROPR public consultation process. On behalf of our client we have reviewed the following information along with portions of the above noted Provincial Plans:</p> <ul style="list-style-type: none"> • Natural Heritage Discussion Paper • Rural and Agricultural System Discussion Paper 	<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 Paul Brown and Associates Inc.'s responses to the Discussion Questions from 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, 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> <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</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Regional Urban Structure Paper • Climate Change Discussion Paper • Regional Municipality of Halton 2017 Development Charges Water/Wastewater Report • Region of Halton Transportation Master Plan (2031) <p>Our comments mainly focus on implications to our client's and the surrounding lands, and therefore we have not provided comments on matters or questions that are beyond the scope of these lands.</p> <p>Executive Summary</p> <p>In the Natural Heritage (NHS) Discussion Paper, suggestions are made to include multiple approaches to the NHS System. This approach may be appropriate in the rural area where multiple Provincial approaches apply.</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 uses, and identification of other mitigative measures, etc., that can only be addressed in detail through area-specific or site-specific studies. Further, it is our client's position that the Buffer Refinement Framework should not be incorporated in policy or in any guidelines.</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 requires updating, 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 corresponding forecasts for that time period along with policy changes requiring a focus on market based ranges.</p> <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 lower tier 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>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>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 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>Climate Change</p> <p>Halton Region thanks Highmeadow Place Holdings Inc. for their submission and comments on the Climate Change Discussion Paper. Regional Staff is putting forward some of the following recommended policy directions to Regional Council for endorsement. 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. 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. 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>

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		<p>A critical factor in reducing Greenhouse Gas emissions is walkable communities. Creating these communities involves providing destinations to walk to, making it comfortable to walk along 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>The Regions Master Water /Wastewater Plan provides for lake- based servicing strategies to 2031. The Region will be required to update the Master Plan to accommodate population and job numbers to 2051. The current Plan provides for both lake-based Water & Wastewater trunk and transmission mains to the immediate vicinity of the subject and surrounding lands. Subject to verification, this existing infrastructure provides the opportunity for simple extensions to the subject and surrounding lands.</p> <p>Halton Region’s Master Transportation Master Plan supports policies and objectives of the ROP to 2031. Similar to Wastewater, the Region will be required to update the Transportation Master Plan to 2051. Currently, the subject and surrounding lands have superior transportation linkages to the James Snow Parkway and higher order corridors of the 401, 407, 403 and QEW.</p> <p>Please find following our detailed comments.</p> <p>Natural Heritage Discussion Paper Questions:</p> <p><i>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?</i></p> <p>In our opinion, Option 2 (Harmonize the Provincial NHSs) is preferred for incorporating the NHS of the Growth Plan into the ROP.</p> <p>Under Option 2, layers for the NHS 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 provide flexibility 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. Option 2 would help to simplify Provincial policy and would provide flexibility to include policies that reflect local considerations for the Regional NHS, as opposed to the more restrictive policies provided for in Option 3.</p> <p><i>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 the ROP be revised further to address these goals and objectives?</i></p> <p>The ROP states, “The goal of the Natural Heritage System (NHS) is to increase the certainty that the biological diversity and ecological functions within Halton will be preserved and enhanced for future generations.” The NHS 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>identify actions to address these challenges (CC-4), and other policy that integrates climate change considerations in the Regional Official Plan.</p> <p>More fulsome details are available 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 (Appendix 2- Part 1), have informed the development of policy directions. Regional responses to local municipal comments are provided in the response charts.</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>Regional Staff will continue their engagement with the development industry as policy development continues in Phase 3 of the Regional Official Plan Review.</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>

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		<p>With reference to the above goal, the NHS Discussion Paper includes discussion on an option to implement 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><i>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?</i></p> <p>The NHS 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 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"> • <i>Minimum Buffers</i> – In our opinion, 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. • <i>Region’s Buffer Refinement Framework</i> – in our opinion, 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. 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>Based in the above, it is our client’s position that the Buffer Refinement Framework should not be incorporated in policy or in any guidelines.</p> <ul style="list-style-type: none"> • <i>30m Buffers</i> - We note a comment in the Background Review Technical Memo 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>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>Buffers were one of the many NHS matters addressed through the Ontario Municipal Board (OMB) hearing for ROPA 38. Through ROPA 38 OMB mediation, there was no agreement on 30m buffer width requirements. 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 uses are better understood, and they can then be identified along with other appropriate mitigation measures.</p> <p><i>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.</i></p> <p>No comment.</p> <p><i>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?</i></p> <p>In our opinion, it is preferred that the NHS and WRS be addressed in separate policies. Notwithstanding there are functional relationships and overlap between the NHS and WRS, some policies applicable to the two systems differ including policies for Key Hydrologic Areas.</p> <p>As noted earlier in this letter, Option 2 presented in the NHS Discussion Paper (addressing these systems separately) is preferred.</p> <p><i>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?</i></p> <p>No comment.</p> <p><i>7. Should the ROP incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</i></p> <p>No comment.</p> <p><i>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?</i></p> <p>The Source Protection Plans identify 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 to achieve conformity to those Plans.</p> <p><i>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?</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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; or 3. Do not map Natural Hazards 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 then issue permits for development and site alteration. 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. Therefore, policies should include the requirement to identify erosion hazards during area-specific and/or site-specific studies.</p> <p><i>10. How can Halton Region best support the protection and enhancement of significant woodlands, through land use policy?</i></p> <p>The NHS 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"> • <i>Woodland Quality</i> – The NHS Discussion Paper suggests that the definition of woodlands and significant woodlands be revised to include criteria to address the quality of the woodland in addition to the existing four criteria. The NHS Discussion Paper notes that the ‘Technical Definitions and Criteria for Key NHS Features in the NHS 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 NHS Discussion Paper continues 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 suggests that any changes to the definition of significant woodland must consider maintaining and enhancing such ecological functions as part of the NHS. The NHS Discussion Paper implies that consideration should be given to provide greater protection to woodlands characterized by invasive tree species. <p>Notwithstanding the above, 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 NHS Discussion Paper:</p> <p>“Additional exclusions may be considered for communities which are dominated by the invasive non-native tree species Buckthorn (<i>Rhamnus</i> species) or Norway Maple (<i>Acer platanoides</i>) that threaten good</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>Based on the above, 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"> • <i>Woodland Changes</i> - The NHS 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>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"> • <i>MNRF Renewable Energy Guideline</i> - 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>“The PPS definition of Significant Woodland was revised in the 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>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.</p> <p><i>11. Are there any additional considerations or trends that Halton Region should review in terms of the Natural Heritage component of the ROP?</i></p> <p>No Comment</p> <p>Rural and Agricultural System Discussion Questions:</p> <p><i>1. Mapping options</i></p> <ul style="list-style-type: none"> a. <i>Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</i> b. <i>Are there any additional pros and cons that could be identified for any of the options?</i> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="696 249 1404 278">c. <i>Do you have a preferred mapping option? If so, why?</i></p> <p data-bbox="649 310 820 338">No comment.</p> <p data-bbox="649 379 982 407">2. <i>Agriculture-related uses</i></p> <p data-bbox="696 445 1961 506">a. <i>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?</i></p> <p data-bbox="696 506 1898 534">b. <i>What additional conditions or restrictions should be required for any agriculture related uses?</i></p> <p data-bbox="696 534 1930 562">c. <i>Should some uses only be permitted in the Rural Area as opposed to Prime Agricultural Lands?</i></p> <p data-bbox="649 602 820 631">No comment.</p> <p data-bbox="649 671 991 699">3. <i>On-farm diversified uses</i></p> <p data-bbox="696 737 1936 798">a. <i>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?</i></p> <p data-bbox="696 798 1898 826">b. <i>What additional conditions or restrictions should be required for any on-farm diversified uses?</i></p> <p data-bbox="696 826 1945 955">c. <i>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?</i></p> <p data-bbox="649 995 820 1024">No comment.</p> <p data-bbox="649 1064 1448 1092">4. <i>To what extent should the updated ROP permit cemeteries in:</i></p> <p data-bbox="696 1092 904 1120">a. <i>Urban Areas</i></p> <p data-bbox="696 1120 895 1149">b. <i>Rural Areas</i></p> <p data-bbox="696 1149 1047 1177">c. <i>Prime Agricultural Areas</i></p> <p data-bbox="649 1217 1889 1278"><i>Explain the criteria e.g. factors that are important to you, that should be considered when evaluating cemetery applications for each?</i></p> <p data-bbox="649 1318 820 1346">No comment.</p> <p data-bbox="649 1387 1889 1447">5. <i>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?</i></p> <p data-bbox="649 1487 1961 1600">The NHS 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. The ROP acknowledges the use of an AIA to avoid, minimize, or mitigate impacts to agriculture. These policies ensure that agricultural operations are significantly protected.</p> <p data-bbox="649 1641 1961 1753">For development in Settlement Areas, the assessment should be completed when lands are being considered for inclusion in a Settlement Area. Further policies at the Secondary Plan stage could discuss options for mitigation but further assessment and AIAs should not be required once the lands are within a Settlement Area boundary.</p> <p data-bbox="649 1794 1805 1822">6. <i>Should the requirements for an AIA be included in any other new or existing ROP policies?</i></p>	<p data-bbox="1992 284 2769 344">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Please refer to the comments above.</p> <p><i>7. Should special needs housing be permitted outside of urban areas and under what conditions?</i></p> <p>No comment.</p> <p><i>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?</i></p> <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, stormwater management ponds and large-scale community wide parks.</p> <p>Regional Urban Structure Discussion Questions:</p> <p><i>Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe:</i></p> <p>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 Regional Urban Structure. Amendment 1 includes extending the Plan horizon year to 2051 from 2041; requiring municipalities to use 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>In addition, 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 be updated or alternatively, 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 the discussion paper.</p> <p><i>1. How can the Regional Official Plan further support the development of Urban Growth Centers?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>2. Should the Region consider the use of Inclusionary Zoning in Protected Major Transit Station Areas to facilitate the provision of affordable housing?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>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</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

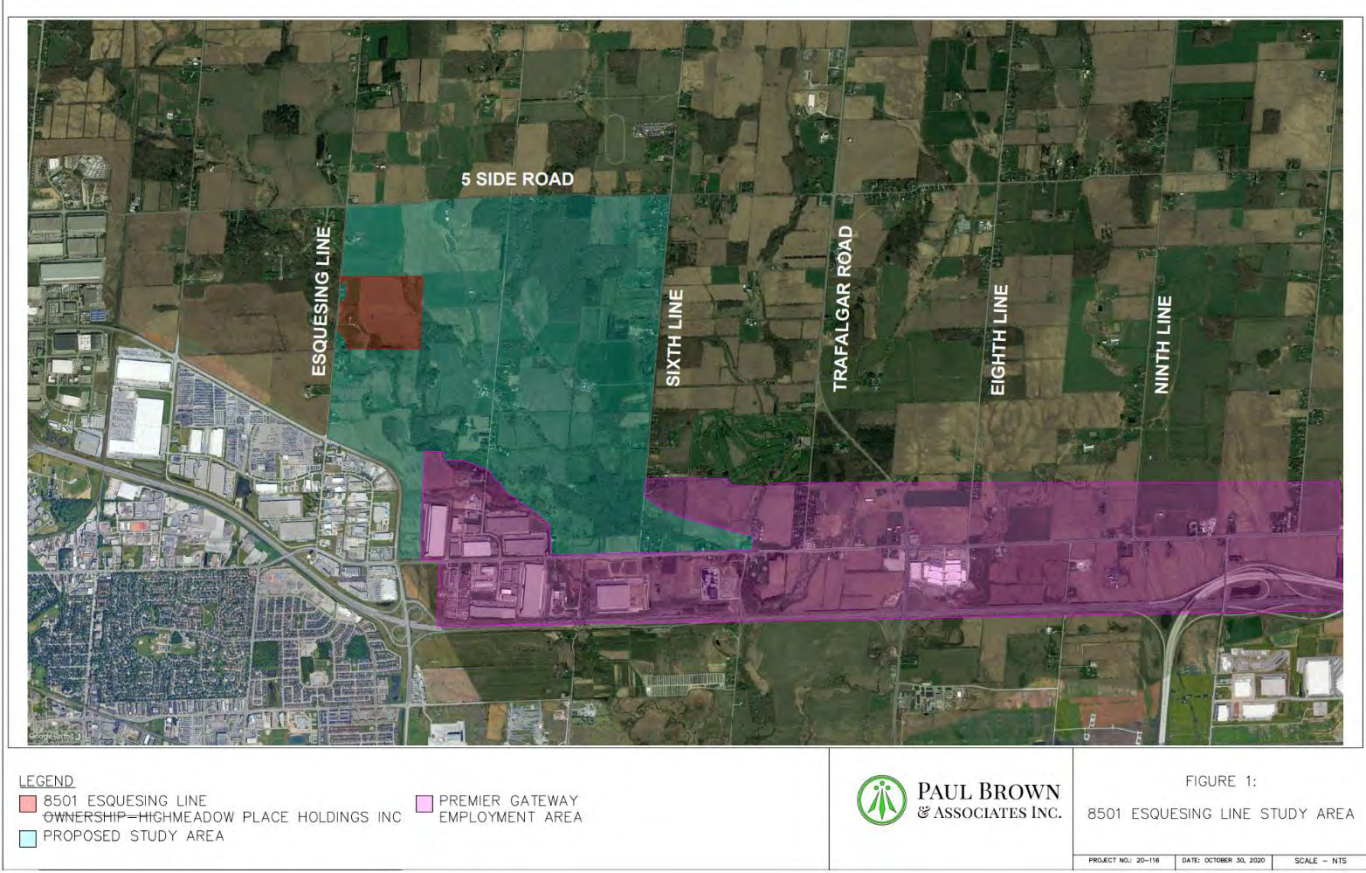
No.	Source	Submission	Response
		<p><i>official plans from appeal? If so, should all Major Transit Station Areas be considered or only those Major Transit Station Areas on Priority Transit Corridors?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>4. From the draft boundaries 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?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>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?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>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?</i></p> <p>This question is not applicable. We offer no comment</p> <p><i>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?</i></p> <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><i>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?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>9. Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?</i></p> <p>This question is not applicable. We offer no comment.</p> <p><i>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?</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Our clients and surrounding area lands should strongly considered as a candidate for addition/expansion to the existing Highpoint Secondary Plan Area. These lands are a logical expansion of the existing urban boundary, offer opportunity for large contiguous land assemblies desired by large industrial end users, have the ability to be serviced by the extension of existing lake based water/wastewater services and maximize these services and are positioned to offer superior transportation linkages to James Snow Parkway and highways 401,407, 403 and the QEW.</p> <p><i>11. How can the Regional Official Plan support employment growth and economic activity in Halton Region?</i></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 determine at this time 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><i>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?</i></p> <p>No comment.</p> <p><i>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?</i></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><i>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?</i></p> <p>No comment.</p> <p><i>15. What factors are important for the Region to consider in setting a minimum Designated Greenfield Area (DGA) density target for Halton Region as a 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?</i></p> <p>No comment.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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><i>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?</i></p> <p>No comment.</p> <p><i>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?</i></p> <p>In our opinion, clear and concise wording and direction should be provided within the ROP related to any policy and/or action. The Region should consider providing guidance or additional details where statements are made to meeting potential new targets or requirements. It would be practical for the ROP to consider the realities and limitations of development as policy directions and requirements are being set.</p> <p><i>Should more be done through Regional Official Plan policies to specifically tie growth management to climate change? If so, what should be done?</i></p> <p>In our opinion, the Region should consider not only reduction of greenhouse gas emissions as it relates to growth management, but also support 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>However, there is not a specific mechanism to reduce climate risks but rather a suite of different measures that could be implemented depending on the context of the local municipality. To implement/achieve this, 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>In our opinion, it would be valuable to engage with the development industry early in the process to ensure that the results of this process are not only scientifically credible, but that they can be applied practically in the industry.</p> <p><i>3. 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?</i></p> <p>Land use arrangement, transportation networks and streetscape design can have a significant impact on commuting patterns. Providing destinations to walk to, making it comfortable to walk along roads and providing higher densities to support transit along transit corridors can all support the reduction of GHG emissions.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>4. Do you think the Region should encourage and support local renewable energy sources? If so, what should be considered?</i></p> <p>In our opinion we suggest the Region consider consistent target setting related to renewable energy in new developments.</p> <p><i>5. Can you provide examples of opportunities to address climate change as it relates to agriculture that you would like to see in Halton?</i></p> <p>No comment.</p> <p><i>6. 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?</i></p> <p>We strongly recommend caution be taken when establishing any such requirement or target without close consultation among all stakeholders in the Region and that any such requirement or target be applied on a case-by-case basis as development proceeds.</p> <p><i>7. Are there additional measures the ROP should include to improve air quality?</i></p> <p>No comment.</p> <p>2017 DEVELOPMENT CHARGES WATER/WASTEWATER TECHNICAL REPORT</p> <p>In 2011, the Region completed the Sustainable Halton Water and Wastewater Master Plan (Master Plan) to support Regional implementation of the Official Plan Amendment (ROPA 38/39) based on the Region's Best Planning Estimates (June 2011). The Master Plan provided a Region-wide water and wastewater servicing strategy to accommodate growth from 2011 to 2031.</p> <p>As one of the key inputs to Halton's Development Charge By-laws the Region completed a number of technical updates to the Master Plan and its associated Capital Implementation Plan and consolidated these updates in the 2017 DEVELOPMENT CHARGES WATER/WASTEWATER TECHNICAL REPORT.</p> <p>Through the 2017 Development Charge By-Law and Capital Implementation Plan implemented by the Regions Allocation Programs, water and wastewater infrastructures including gravity trunk and transmission mains, reservoirs and pump stations, wastewater pump stations and force-mains were comprehensively planned and designed.</p> <p>WATER SERVICING</p> <p>As mandated by the Province, the Region's OPA will be required to plan for and accommodate growth from to 2051. Under this direction, the Region will be required to update the current Master Water/Wastewater Plan (Master Plan) that addresses growth to 2031. Upon the Region confirming a preferred growth option to 2051, the Region will then undertake several studies which will include an update to the Master Plan with accompanying Development Charge By-laws to implement the Master Plan through a Capital Implementation Plan.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The current Master Plan provides for a large diameter lake- based transmission watermain (400 mm diameter) being extended north on Esquesing Line from an existing watermain on James Snow Parkway to the immediate vicinity of the subject lands. Subject to verification, this watermain provides the opportunity for a simple extension to provide lake-based water services to the subject lands complying with a Regional principle of maximizing highest and best use of existing Regional infrastructure.</p> <p>WASTEWATER SERVICING</p> <p>Similar to the above, the current Master Plan provides for a large diameter trunk wastewater main (525 mm diameter) on Esquesing Line connecting to the existing wastewater trunk sewer on Steeles Avenue West. Subject to verification, this wastewater main provide the opportunity for a simple extension to provide lake-based wastewater servicing for the subject lands again complying with a Regional principle of maximizing highest and best use of existing Regional infrastructure.</p> <p>REGION OF HALTON TRANSPORATION MASTER PLAN 2031</p> <p>The Halton Region Transportation Master Plan (2031) – The Road to Change defines a sustainable, integrated transportation system that considers all modes of travel (automobiles, transit, cycling, walking) and supports the policies and objectives arising out of the Halton Region Official Plan Review to the year 2031 (ROPA 38).</p> <p>The transportation system serving the Region is complex, comprising a network of infrastructure and services planned, constructed, operated and maintained by Provincial, Regional and local municipal agencies. All elements of the system are interconnected and play a role in the provision of transportation services to the residents and businesses in Halton.</p> <p>The Transportation Master Plan, The Road to Change, provides the strategies, policies and tools for the development of a balanced and sustainable transportation system that will support the objectives of Sustainable Halton and meet the Region’s transportation needs safely, effectively and cost efficiently to 2031.</p> <p>Similar to Water and Wastewater Servicing, the Province’s mandate to Plan for growth to 2051 will require the Region to update and amend the current Transportation Master Plan to accommodate population and job numbers.</p> <p>Through the existing 2031 Master Transportation Plan the Region provided for superior transportation links to higher order corridors including Highways 401, 407, 403 and QEW. In the immediate vicinity of the subject lands the Region planned for and constructed James Snow Parkway southerly to Britannia Road. By 2031 this Right-of-Way will be extended south to provide a direct link to the 407.</p> <p>These superior transportation links position the subject lands or highest and best use of transportation infrastructure and provide the opportunity to bring these strategic lands to market in the near future.</p> <p>We thank you for the opportunity to comment on the Discussion Papers and the Regions Master Water, Wastewater and Transportation Plan specific to the subject and surrounding lands.</p> <p>Please trust this letter will be included in the package of comments to Regional Council for review and consideration.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Yours very truly, Paul Brown & Associates Inc. Paul Brown President</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>
36.	Hornby Glen Golf Course	<p>Attached per email dated 2020-10-30</p> <p>Re: Region of Halton Official Plan Review (ROPR) Natural Heritage Discussion Paper 8286 Hornby Road Part Lot 2, Concession VII (Esquesing) Town of Halton Hills</p> <p>We act for Hornby Glen Realty Inc. and wish to provide comments related to the proposed natural heritage system outlined within the Region of Halton Natural Heritage Discussion Paper (June 2020) as it pertains to 8286 Hornby Road in the Town of Halton Hills (Subject Lands).</p> <p>The Subject Lands were included in a recent and comprehensive planning exercise under which these lands were brought into the Urban Area for employment uses. Regional Official Plan Amendment #47 was adopted by the Region on April 18, 2018 and approved by the Local Planning Appeal Tribunal on May 13, 2020. An implementing Secondary Plan was adopted by Halton Hills as Official Plan Amendment #31B on June 11, 2018.</p>	<p>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. For the purpose of the proposed draft Natural Heritage System mapping that was released with the Discussion Papers, the last date used for planning approvals for the mapping was June 2018. The LPAT Decision occurred in May 2020. Therefore, any refinements to the proposed draft Regional Natural Heritage System mapping that occurred after June 2018 until June 2021 will need to be reflected in the next draft of the mapping. 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.</p>

No.	Source	Submission	Response
		<p>One of the background reports to the Secondary Plan was the Premier Gateway Phase 1B Scoped Subwatershed Plan (Amec Foster Wheeler, April 2020) which comprehensively reviews the natural heritage aspects of the Subject Lands and supports the Secondary Plan.</p> <p>For your reference I attached the following:</p> <ol style="list-style-type: none"> 1. Location Sketch of Subject Lands 2. ROPA #47 adopted April 18, 2018 3. LPAT decision dated May 13, 2020 4. OPA #31B adopted June 11, 2018 5. The Premier Gateway Phase 1B Scoped Subwatershed Plan (Amec Foster Wheeler, April 2020) <p>We are making this submission to comply with the commenting timeline which was provided. It is our intention to retain the services of an environmental planner to provide further technical comments in the coming days.</p> <p>Kindly acknowledge receipt of these comments.</p> <p>Yours truly,</p> <p>Arnold Foster LLP</p> <p>Herbert T. Arnold</p> <p>Attachment 1</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<div data-bbox="658 258 1951 1239"> <p>Town of Halton Hills</p> <p>Legend</p> <ul style="list-style-type: none"> Town Boundary Urban, Hamlet, Rural Area Urban Hamlet Rural Cluster Street Parcel, Assessment Parcel, Owner <p>Scale: 1:17,633 Date: 10/30/2020</p> <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> </div> <p data-bbox="646 1286 823 1314">Attachment 2</p>	<p data-bbox="1982 310 2769 379">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: right;">Attachment #1 to LPS26-18</p> <p style="text-align: center;">Amendment No. 47 to THE REGIONAL PLAN Official Plan for the Halton Planning Area Regional Municipality of Halton</p> <hr/> <p style="text-align: center;">An Amendment to Address a Shortfall of Employment Lands in the Town of Halton Hills' Premier Gateway Employment Area</p> <p style="text-align: center;"><i>April 2018</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">DECLARATION</p> <p style="text-align: center;">IN THE MATTER OF REGIONAL OFFICIAL PLAN AMENDMENT NUMBER 47</p> <p style="text-align: center;">IN THE REGIONAL MUNICIPALITY OF HALTON</p> <p>I, Graham Milne, in my capacity as Regional Clerk for the Regional Municipality of Halton, hereby declare that notice of adoption by Council for the Regional Municipality of Halton was given under Section 17(23) of the <i>Planning Act</i>, R.S.O., 1990, c.P.13.</p> <p>There were no appeals to ROPA 47 within the time allowed for appeal. Under Section 17(27) of the <i>Planning Act</i>, R.S.O. 1990, c.P.13, Regional Official Plan Amendment Number 47 came into force and effect on _____, 2018, being the day following the last day for filing a notice of appeal.</p> <p>_____ Graham Milne Regional Clerk Regional Municipality of Halton</p> <p>_____ Date</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p style="text-align: center;">TABLE OF CONTENTS</p> <p>THE CONSTITUTIONAL STATEMENT 1</p> <p>PART A THE PREAMBLE.....2</p> <p> Purpose2</p> <p> Location2</p> <p> Basis.....3</p> <p>PART B THE AMENDMENT 5</p> <p> Introductory Statement 5</p> <p> Details of the Amendment 5</p> <p>PART C THE APPENDICES 8</p> <p> Appendix I Notice of Public Meeting 18</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>THE CONSTITUTIONAL STATEMENT Part A, The Preamble, does not constitute part of this Amendment.</p> <p>Part B, The Amendment, consisting of 10 items to incorporate certain lands into the Region's Urban Area with an Employment Area overlay to address a shortfall of employment lands, constitutes Amendment No. 47 to the Regional Plan, the Official Plan for Halton Planning Area, Regional Municipality of Halton. The title of Amendment No. 47 is "An Amendment to Address a Shortfall of Employment Lands in the Town of Halton Hills' Premier Gateway Employment Area".</p> <p>Part C, The Appendices, does not constitute part of this Amendment.</p> <p>PART A THE PREAMBLE</p> <p><u>Purpose</u></p> <p>The purpose of this Amendment is to address the shortfall of employment lands within the area of the Town of Halton Hills known as the Premier Gateway Employment Area. The result of the amendment is to incorporate into the Urban Area lands to be planned and developed for employment uses.</p> <p><u>Location</u></p> <p>The area containing lands to be incorporated into the Urban Area is referred to as the "Amendment Area" and is shown in Figure 1 below. It contains the lands bounded by:</p> <ul style="list-style-type: none"> i. North – the northern boundary of Lot 2, Esquesing ii. East – Eighth Line iii. South – the southern boundary of Lot 2, Esquesing iv. West – the western boundary of the property known as 8286 Hornby Road 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p data-bbox="708 278 1227 318">Figure 1: The Amendment Area</p>  <p data-bbox="646 1366 724 1397"><u>Basis</u></p> <p data-bbox="646 1433 1951 1719">In 2009, Regional Council adopted Regional Official Plan Amendment (ROPA) No. 38 – “An Amendment to Incorporate the Results of Sustainable Halton, Official Plan Review Directions and Other Matters”. Among other things, ROPA 38 identified a growth strategy through a municipal comprehensive review process which included the addition of employment lands to accommodate growth to the 2031 planning horizon. Specifically, ROPA 38 allocated 23,000 jobs to the Town of Halton Hills between 2006 and 2031 and added 340 hectares of land to the Urban Area on the north side of Steeles Avenue within an area known as the Premier Gateway Employment Area (PGEA). These lands were added to the existing employment lands in the area on the south side of Steeles Avenue, incorporated into the Urban Area through the Halton Urban Structure Plan in 1999.</p> <p data-bbox="646 1755 1951 1818">In 2011, Regional Council approved ROPA No. 39 – “Regional Development Phasing to 2031”. Through this amendment, the urban lands introduced through Sustainable Halton, including those in the PGEA</p>	<p data-bbox="1982 310 2769 379">Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>referenced above, were identified as “Urban Area with Regional Phasing between 2021 and 2031” on Map 5. In addition, detailed phasing in five-year increments was introduced in a new Table 2a of the Regional Plan.</p> <p>Together, ROPAs 38 and 39 implemented a strategy to accommodate the growth to 2031 allocated to Halton Region through the Growth Plan for the Greater Golden Horseshoe, 2006. The growth strategy reflected in these amendments was approved by the Ontario Municipal Board and in force and effect as of October 21, 2013.</p> <p>In 2014, Regional Council approved ROPA No. 43 – “Halton Peel Boundary Area Transportation Study / Greater Toronto Area West Corridor Protection”. ROPA 43 was required as a result of the transportation planning exercises known as the Greater Toronto Area West Transportation Corridor Planning and Environmental Assessment Study (“GTA West”) and the Halton Peel Boundary Area Transportation Study (“HPBATS”). ROPA 43 had two purposes, described below.</p> <p>First, it introduced a Corridor Protection Area on Map 3 and Map 5 of the Regional Official Plan to protect for GTA West and HPBATS. Protecting for these potential corridors had the effect of prohibiting development in the area, including on lands within the pre-2021 Regional Phase which were designated and zoned locally. As a result, the second component of ROPA 43 was the realignment of the Regional Phasing on Map 5 so that the lands in the 2021 to 2031 Regional Phase were also within the Corridor Protection Area. This meant that the part of the PGEA known as ‘Phase 1B’ would be within the earlier pre-2021 Regional Phase as opposed to the later 2021 to 2031 Regional Phase.</p> <p>While this rephasing assisted in re-establishing the supply of pre-2021 employment lands, it did not fully replace the supply that existed prior to ROPA 43. As a result, the need for a process to identify up to approximately 75 hectares of “replacement” employment lands to address the shortfall was established. ROPA 43 stated that these additional employment lands would be incorporated into the Regional Plan by way of a further amendment undertaken in consultation with the Town of Halton Hills and the Province. ROPA 47 represents the further amendment identified through the ROPA 43 process.</p> <p>In January 2015, the Town of Halton Hills initiated the Premier Gateway Phase 1B Integrated Planning Project. The purpose of this project was to study and identify the appropriate location for the “replacement” lands required to address the shortfall of pre- 2021 employment lands in the PGEA. In tandem with this, the Town would undertake a comprehensive planning process to develop a Secondary Plan for the existing Phase 1B area as well as the “replacement” lands. The Town’s process included a number of technical studies such as an Agricultural Impact Assessment and a Subwatershed Study as well as a public consultation process.</p> <p>In March 2017, Town Council endorsed a Preferred Land Use Concept which identified the location for the “replacement” lands and set out a planning framework for the area in its entirety including land use designations, a refined natural heritage system, and a transportation network.</p> <p>ROPA 47 implements the results of the Town’s integrated planning work as it relates to the location of the “replacement” employment lands. This is achieved by redesignating the lands within the Amendment Area currently within the “Agricultural Area” designation to the “Urban Area” designation with an “Employment Area” overlay. As a result of this change to Map 1, a number of corresponding changes are required to other Maps to reflect the change to the “Urban Area” designation and certain constraints.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

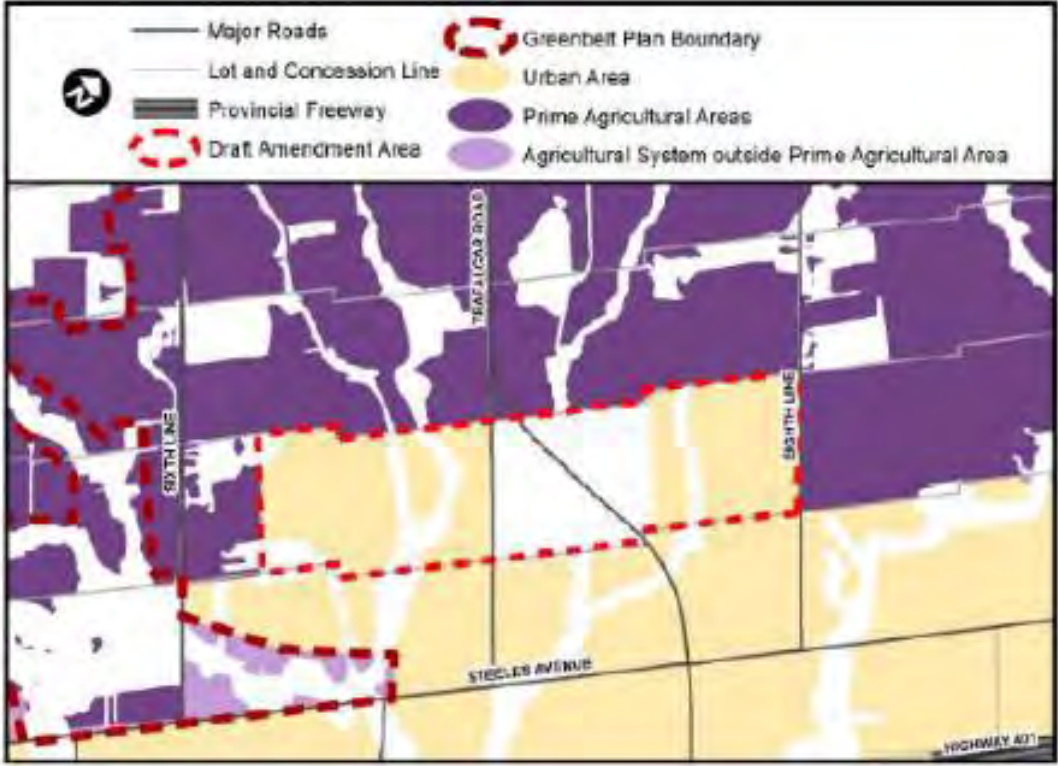
No.	Source	Submission	Response
		<p>ROPA 47 will enable comprehensive planning of these lands and the continued implementation of the growth strategy set out in the Regional Plan.</p> <p>PART B THE AMENDMENT</p> <p><u>Introductory Statement</u></p> <p>All of this part constitutes Amendment No. 47 to the Regional Plan, the Official Plan for Halton Planning Area, Regional Municipality of Halton.</p> <p><u>Details of the Amendment</u></p> <p>The Regional Plan is amended as follows:</p> <p>Item 1 Map 1, <i>Regional Structure</i>, is amended by redesignating the lands designated “Agricultural Area” within the Amendment Area to “Urban Area” and applying the “Employment Area” overlay to these lands as shown herein on Map 1 provided as Attachment #1.</p> <p>Item 2 Map 1B, <i>Parkway Belt Transportation and Utility Corridors</i>, is amended to reflect the modified “Urban Area” designation as shown herein on Map 1B provided as Attachment #2.</p> <p>Item 3 Map 1C, <i>Future Strategic Employment Areas</i>, is amended to reflect the modified “Urban Area” designation and “Employment Area” overlay and to remove the “Future Strategic Employment Areas (Overlay)” constraint from this area as shown herein on Map 1C provided as Attachment #3.</p> <p>Item 4 Map 1D, <i>Municipal Wellhead Protection Zones</i>, is amended to reflect the modified “Urban Area” designation as shown herein on Map 1D provided as Attachment #4.</p> <p>Item 5 Map 1E, <i>Agricultural System and Settlement Areas</i>, is amended to reflect the modified “Urban Area” designation and to remove the “Prime Agricultural Areas” and “Agricultural System Outside Prime Agricultural Area” constraints from this area as shown herein on Map 1E provided as Attachment #5.</p> <p>Item 6 Map 1F, <i>Identified Mineral Resource Areas</i>, is amended to reflect the modified “Urban Area” designation and to remove the “Identified Mineral Resource Area” constraint from this area as shown herein on Map 1F provided as Attachment #6.</p> <p>Item 7 Map 1G, <i>Key Features within the Greenbelt and Regional Natural Heritage Systems</i>, is amended to reflect the modified “Urban Area” designation and to modify the areas previously identified as “Prime Agricultural Areas in NHS Enhancements/Linkages/Buffers” to Enhancement Areas, Linkages and Buffers” as shown herein on Map 1G provided as Attachment #7.</p> <p>Item 8 Map 3, <i>Functional Plan of Major Transportation Facilities</i>, is amended to reflect the modified “Urban Area” designation as shown herein on Map 3 provided as Attachment #8.</p> <p>Item 9 Map 4, <i>Right-of-Way Requirements of Arterial Roads</i>, is amended to reflect the modified “Urban Area” designation as shown herein on Map 4 provided as Attachment #9.</p> <p>Item 10 Map 5, <i>Regional Phasing</i>, is amended to reflect the modified “Urban Area” designation as shown herein on Map 5 provided as Attachment #10.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment #1</p> <p>Map 1 Regional Structure</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

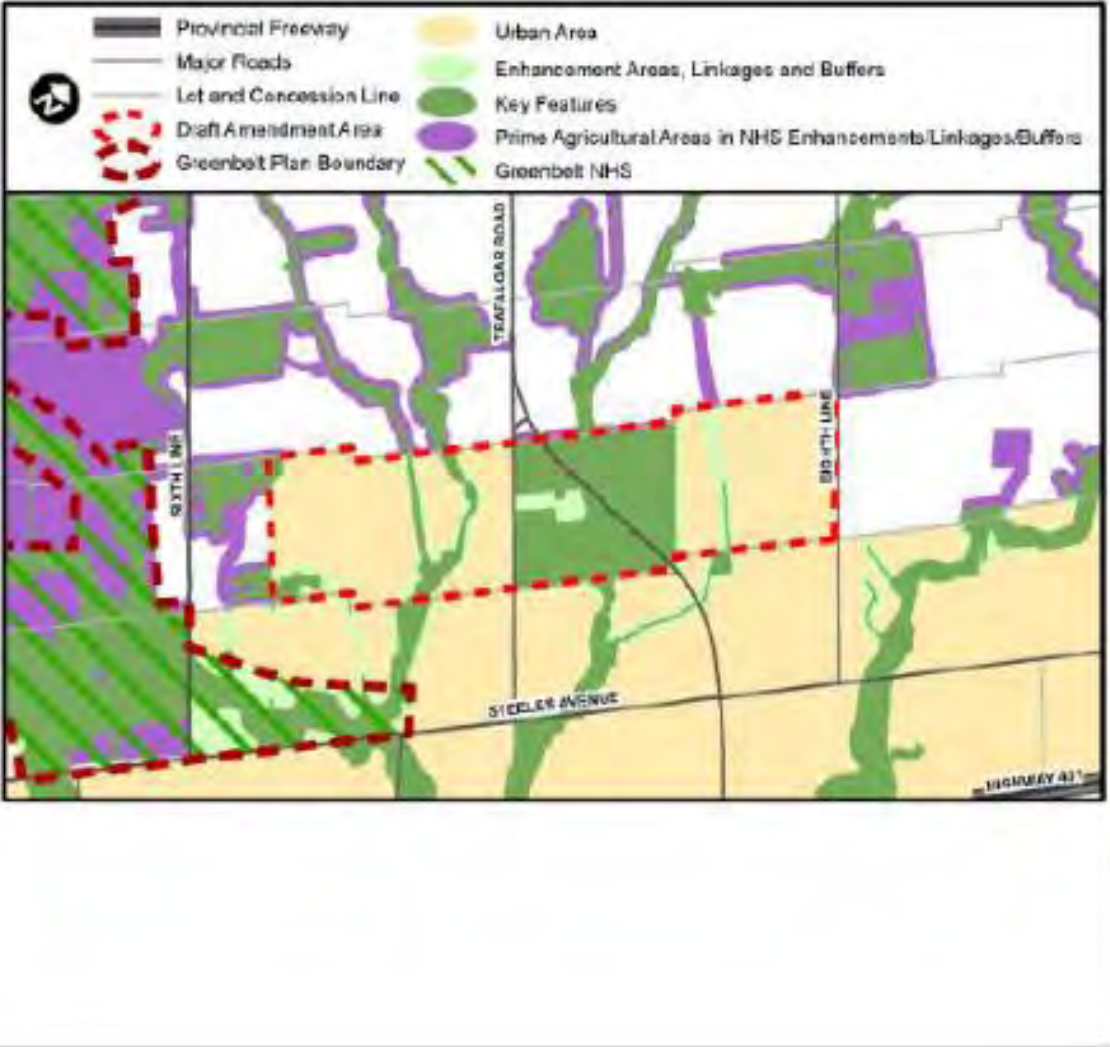
No.	Source	Submission	Response
		<p data-bbox="668 272 854 302">Attachment #2</p> <p data-bbox="668 342 1072 393"><i>Map 1B Parkway Belt Transportation Corridors</i></p>  <p data-bbox="745 453 1662 574"> Legend: Major Roads Lot and Concession Line Provincial Freeway Draft Amendment Area Urban Area Parkway Belt Transportation and Utility Corridor </p>	<p data-bbox="1989 312 2766 372">Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Attachment #3</p> <p>Map 1C Future Strategic Employment Areas</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment #4</p> <p>Map 1D Municipal Wellhead Protection Zones</p>  <p>The map displays a red dashed rectangular area labeled 'Draft Amendment Area' situated within a larger yellow-shaded 'Urban Area'. The urban area is bounded by Trappalgar Road to the north, Steele's Avenue to the south, Sixth Line to the west, and Richth Line to the east. Highway 401 is visible at the bottom right. The legend includes symbols for Major Roads (solid line), Lot and Concession Line (dashed line), Provincial Freeway (thick grey line), Draft Amendment Area (red dashed line), Urban Area (yellow fill), and Parkway Belt Transportation and Utility Corridor (purple oval).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Attachment #5</p> <p>Map 1E Agricultural System and Settlement Areas</p>  <p>Legend:</p> <ul style="list-style-type: none"> Major Roads Lot and Concession Line Provincial Freeway Draft Amendment Area Greenbelt Plan Boundary Urban Area Prime Agricultural Areas Agricultural System outside Prime Agricultural Area 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Attachment #6</p> <p>Map 1F Identified Mineral Resource Areas</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment #7</p> <p>Map 1G Key Features within the Greenbelt and Regional Natural Heritage Systems</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Attachment #8</p> <p>Map 3 Functional Plan of Major Transportation Facilities</p>  <p>The map displays a functional plan for major transportation facilities. A legend at the top identifies various road types and areas: Major Roads (black line), Provincial Freeway (blue line), Provincial Highway (purple line), Major Arterial (red line), Multi-Purpose Arterial (orange line), Minor Arterial (yellow line), Urban Area (orange shaded region), Higher Order Transit Corridor (green oval), and Dist. Alternatives Area (red dashed line). The map shows a network of roads including Major Roads, Provincial Freeway, Provincial Highway, Major Arterial, Multi-Purpose Arterial, and Minor Arterial. Key roads labeled include Sixth Line, Trafalgar Road, Steeles Avenue, and Highway 401. A red dashed line indicates a Dist. Alternatives Area, and a green oval indicates a Higher Order Transit Corridor.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment #9</p> <p>Map 4 Right-of-Way Requirements of Arterial Roads</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Attachment #10</p> <p>Map 5 Regional Phasing</p>  <p>PART C THE APPENDICES</p> <p>The following Appendices do not constitute part of Amendment No. 47, but are included as information supporting the amendment.</p> <p>Appendix I Notice of Public Meeting</p> <p>Appendix I Notice of Public Meeting</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>Halton halton.ca 311</p> <p>NOTICE OF PUBLIC MEETING</p> <p>Proposed Amendment to the Regional Official Plan "An Amendment to Address a Shortfall of Employment Lands in the Town of Halton Hills' Premier Gateway Employment Area" Applicant: Halton Region File Number: ROPA 47 (RQ59A)</p> <p>The Council of the Regional Municipality of Halton, through its Planning and Public Works Committee, is holding a Public Meeting to provide the public an opportunity to comment on a proposed Amendment to the Regional Official Plan pursuant to Section 17 of the <i>Planning Act</i>.</p> <p>Date: Wednesday November 8, 2017 Time: 9:45 a.m. Place: Council Chambers Halton Regional Centre 1151 Bronte Road Oakville, Ontario, L6M 3L1 Phone: 905-825-6000 Toll free: 1-866-442-5866 Website: halton.ca</p> <p>Purpose and Effect: The purpose of the proposed Regional Official Plan Amendment is to address the shortfall of employment lands in the Town of Halton Hills by incorporating lands north of the Premier Gateway Employment Area in the "Draft Amendment Area" into the Region's Urban Area as shown on Map 1 of the Regional Official Plan. The effect of the proposed Amendment is to ensure there is sufficient employment land available for development in the pre-2021 phase, consistent with the growth strategy set out in the Regional Official Plan.</p> <p>Location: The proposed Regional Official Plan Amendment applies to the lands in the Town of Halton Hills identified as the "Draft Amendment Area" in the map to the right.</p> <p>Other Applications: The Town of Halton Hills will be initiating a corresponding Local Official Plan Amendment. The lands subject to the proposed Amendment are also being planned as a part of the Town of Halton Hills' Premier Gateway Phase 1B Integrated Planning Project (File: D08 Phase 1B Secondary Plan).</p> <p>To Get More Information: The proposed Amendment may be viewed at the Office of the Regional Clerk (at 1151 Bronte Road, Oakville) or at the Planning Services Office (at 1075 North Service Road West, Oakville) between the hours of 8:30 a.m. and 4:30 p.m. weekdays, or a copy may be obtained by contacting Owen McCabe at 905-825-6000, ext. 7391, or toll free at 1-866-442-5866, or at owen.mccabe@halton.ca. Information regarding the proposed Amendment is also available at www.halton.ca/ROPA47.</p> <p>Any person may attend the public meeting and make representations concerning this matter. If you wish to make a written submission to be included in the meeting agenda, contact the Regional Clerk's Office at regionalclerk@halton.ca by 12 p.m. on October 26, 2017, or call 905-825-6000 ext. 7405 or toll free at 1-866-442-5866.</p> <p>All information including names, addresses, opinions, presentations, reports, documentation, etc. provided for or at a Public Meeting are considered public records. This information may be posted on Halton Region's website and/or made available to the public upon request. The Public Meeting will be streamed and a video of the meeting will be made available on Halton Region's website.</p> <p>Note: If a person or public body does not make oral submissions at a public meeting or make written submissions to Halton Region before the proposed official plan amendment is adopted, the person or public body is not entitled to appeal Halton Regional Council's decision to the Ontario Municipal Board. If a person or public body does not make oral submissions at a public meeting or make a written submission to Halton Region before the proposed official plan amendment is adopted, the person or public body may not be added as a party to the hearing of an appeal before the Ontario Municipal Board unless, in the opinion of the Board, there are reasonable grounds to add the person or the public body as a party. If you wish to be notified of the decision of Halton Region on the proposed official plan amendment, you must make a written request to the Regional Clerk, Regional Municipality of Halton, Regional Clerk's Office, 1151 Bronte Road, Oakville, ON, L6M 3L1. Dated at the Town of Oakville, October 19, 2017 Graham Milne, Acting Regional Clerk</p> <p>Please contact us, as soon as possible, if you have any accessibility needs at Halton Region events or meetings.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

Attachment 3

No.	Source	Submission	Response										
		<p>Local Planning Appeal Tribunal Tribunal d'appel de l'aménagement local</p>  <p>ISSUE DATE: May 13, 2020 CASE NO(S): PL180499</p> <p>The Ontario Municipal Board (the "OMB") is continued under the name Local Planning Appeal Tribunal (the "Tribunal"), and any reference to the Ontario Municipal Board or Board in any publication of the Tribunal is deemed to be a reference to the Tribunal.</p> <p>PROCEEDING COMMENCED UNDER subsection 17(24) of the <i>Planning Act</i>, R.S.O. 1990, c. P.13, as amended</p> <p>Appellant: Hodero Holdings Ltd. Subject: Proposed Official Plan Amendment No. OPA 47 Municipality: Upper Tier of Halton LPAT Case No.: PL180499 LPAT File No.: PL180499 LPAT Case Name: Hodero Holdings Ltd. v. Halton (Region)</p> <p>Heard: December 13, 2019 by telephone conference call</p> <p>APPEARANCES:</p> <table border="0"> <thead> <tr> <th data-bbox="662 1235 755 1262"><u>Parties</u></th> <th data-bbox="1128 1235 1236 1262"><u>Counsel</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="662 1296 951 1322">Hodero Holdings Limited</td> <td data-bbox="1128 1296 1268 1352">S. Snider S. Kaufman</td> </tr> <tr> <td data-bbox="662 1382 857 1409">Region of Halton</td> <td data-bbox="1128 1382 1215 1409">I. Tang</td> </tr> <tr> <td data-bbox="662 1473 895 1499">Town of Halton Hills</td> <td data-bbox="1128 1473 1230 1499">J. Wilker</td> </tr> <tr> <td data-bbox="662 1564 926 1590">BK Prime Ontario 1 LP</td> <td data-bbox="1128 1564 1286 1590">P. Harrington</td> </tr> </tbody> </table> <p><u>MEMORANDUM OF ORAL DECISION DELIVERED BY SUSAN de AVELLAR SCHILLER ON DECEMBER 13, 2019 AND ORDER OF THE TRIBUNAL</u></p> <p>[1] The Region of Halton ("Region") adopted Regional Official Plan Amendment No. 47 ("ROPA 47") on April 18, 2018. ROPA 47 designates certain lands in the Town of Halton Hills ("Town") as "Urban Area"</p>	<u>Parties</u>	<u>Counsel</u>	Hodero Holdings Limited	S. Snider S. Kaufman	Region of Halton	I. Tang	Town of Halton Hills	J. Wilker	BK Prime Ontario 1 LP	P. Harrington	<p>Comments are acknowledged. Please see above for a detailed response.</p>
<u>Parties</u>	<u>Counsel</u>												
Hodero Holdings Limited	S. Snider S. Kaufman												
Region of Halton	I. Tang												
Town of Halton Hills	J. Wilker												
BK Prime Ontario 1 LP	P. Harrington												

No.	Source	Submission	Response
		<p>that are to be planned and developed for employment uses as part of the Premier Gateway Employment Area of the Town.</p> <p>[2] Two appeals were filed against ROPA 47. At the time of the appeals, the Growth Plan for the Greater Golden Horseshoe, 2017 (“Growth Plan 2017”) was in effect. The first appeal was filed by the Ministry of Municipal Affairs and Housing (“MMAH”) on the basis that ROPA 47 fails to conform to the Growth Plan 2017. ROPA 47 expands the urban settlement area boundary of the Town. MMAH took the position that it did so without completing a municipal comprehensive review and a land needs assessment.</p> <p>[3] The Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan 2019”) has since come into effect. Section 3(5) of the <i>Planning Act</i> (“Act”) requires decisions of this Tribunal that affect a planning matter to be made in conformity with the Provincial Growth Plans that are made under the <i>Places to Grow Act, 2005</i> and in effect on the date of the decision.</p> <p>[4] Policy 2.2.8 deals with settlement area expansions.</p> <p>[5] Section 2.2.8.5 of the Growth Plan 2019 makes clear that a settlement area expansion may occur in advance of a municipal comprehensive review.</p> <p>[6] Policy 2.2.8.6 of the Growth Plan 2019 limits such expansions to the addition of 40 hectares to the settlement area.</p> <p>[7] Ontario Regulation 305/19 (“O.Reg. 305/19”) is the transition regulation for the Growth Plan 2019 and came into effect on September 6, 2019. At s. 4(3), O. Reg. 305/19 states:</p> <p>[8] On October 8, 2019 MMAH withdrew its appeal of ROPA 47.</p> <p>[9] The second appeal was filed by Hodero Holdings Ltd. (“Hodero”). With the withdrawal by MMAH of its appeal, Hodero’s appeal is the single remaining one.</p> <p>[10] Hodero’s appeal asserted that ROPA 47 failed to conform to the Growth Plan 2017 and is not consistent with the Provincial Policy Statement (“PPS”). Hodero has lands within the existing settlement area boundary and asserted that its lands should develop prior to or concurrent with the addition of lands as a result of a settlement area boundary expansion. By not providing for such timing, Hodero asserted that ROPA 47 failed to optimize the use of lands within the settlement area boundary prior to expanding that boundary. Hodero’s lands are within an area that is scheduled for development between 2021 and 2031, but not before.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>[11] Extensive discussions occurred between the Town, the Region, Hodero and Hodero's associated company 8079 Eighth Line Halton Hills Inc. that have resulted in a settlement of the Hodero appeal. This telephone conference call was scheduled to deal with that settlement.</p> <p>[12] The Tribunal had before it, the affidavit of Owen McCabe, sworn November 27, 2019. Mr. McCabe is a full Member of the Canadian Institute of Planners and a Registered Professional Planner in Ontario whom the Tribunal qualified to provide independent expert opinion evidence in land use planning matters. The Tribunal brought Mr. McCabe's affidavit in as Exhibit 1 in these proceedings. Mr. McCabe's evidence was unchallenged. The Tribunal has accepted his evidence and relied upon it in these matters.</p> <p>[13] The Tribunal also had before it the Minutes of Settlement in this matter and brought those in as Exhibit 2 in these proceedings.</p> <p>[14] Hodero wishes to develop its lands for a major employment use. Certain other planning permissions are required to do so, apart from the disposition of Hodero's appeal in this matter.</p> <p>[15] In the matter now before the Tribunal, the Parties seek a site-specific policy modification that permits the Hodero lands to be developed prior to 2021, with certain conditions. This policy states:</p> <p style="padding-left: 40px;">Notwithstanding Section 77(16) of this Plan, the lands municipally known as 8079 Eighth Line and part of Lot 1, Concession IX, former Township of Esquesing, in the Town of Halton Hills may be permitted to develop prior to 2021 in accordance with the other <i>policies</i> of this Plan, provided that a Local Official Plan Amendment is approved that:</p> <p style="padding-left: 40px;">a) demonstrates how the lands can be integrated into an <i>Area-Specific Plan</i>, including by addressing the appropriate requirements of Section 77(5) of this Plan; and</p> <p style="padding-left: 40px;">b) supports the development of a major employment use.</p> <p>[16] The Tribunal finds that, with this site-specific policy modification added to ROPA 47, ROPA 47 conforms to the Growth Plan 2019.</p> <p>[17] At the time of the hearing, the PPS 2014 was in effect. The Tribunal finds that, with this site-specific policy modification added to ROPA 47, ROPA 47 is consistent with the PPS 2014.</p> <p>[18] Since the time of the hearing, the PPS 2020 has come into effect. The Tribunal reviewed and considered Mr. McCabe's evidence regarding consistency with the PPS 2014 and finds that the foundation for a finding of consistency with the PPS 2014 applies similarly to the PPS 2020. The Tribunal finds that, with this site-specific policy modification added to ROPA 47, ROPA 47 is also consistent with the PPS 2020.</p> <p>[19] The Tribunal finds that ROPA 47, as modified, has had appropriate regard for the matters of Provincial interest set out in s. 2 of the Act. The Tribunal notes, in particular, s. 2(h) on orderly development, s. 2(p) on the appropriate location of growth and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>development, s. 2(k) on the provision of employment opportunities and s. 2(l) on the protection of the financial well-being of the Province and its municipalities.</p> <p>[20] The Tribunal may be spoken to if difficulties arise in the implementation of this Order.</p> <p>ORDER</p> <p>[21] The Tribunal Orders that the appeal by Hodero Holdings Ltd. is allowed in part and Regional Official Plan Amendment No. 47 is modified by adding the site-specific amendment as follows:</p> <p style="padding-left: 40px;">Notwithstanding Section 77(16) of this Plan, the lands municipally known as 8079 Eighth Line and part of Lot 1, Concession IX, former Township of Esquesing, in the Town of Halton Hills may be permitted to develop prior to 2021 in accordance with the other <i>policies</i> of this Plan, provided that a Local Official Plan Amendment is approved that:</p> <p style="padding-left: 40px;">a) demonstrates how the lands can be integrated into an <i>Area-Specific Plan</i>, including by addressing the appropriate requirements of Section 77(5) of this Plan; and</p> <p style="padding-left: 40px;">b) supports the development of a major employment use.</p> <p><i>“Susan de Avellar Schiller”</i> SUSAN de AVELLAR SCHILLER VICE-CHAIR</p> <p>If there is an attachment referred to in this document, please visit www.elto.gov.on.ca to view the attachment in PDF format.</p> <p>Local Planning Appeal Tribunal</p> <p>A constituent tribunal of Tribunals Ontario - Environment and Land Division Website: www.elto.gov.on.ca Telephone: 416-212-6349 Toll Free: 1-866-448-2248</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
37.	Mattamy Homes	<p>Email dated 2020-10-30 (Turkstra Mazza Associates)</p> <p>Dear Mr. Benson,</p> <p>Re: Regional Official Plan Review (ROPR) Discussion Papers Comments on Behalf of Mattamy Homes Our File No. 13668</p> <p>We are counsel to Mattamy Homes and associated companies (“Mattamy”). Mattamy has extensive land holdings in the Region of Halton and a demonstrated track record of delivering high quality communities over many years.</p> <p>We are writing at this time to provide Mattamy’s submissions on the five Discussion Papers released for public comment as part of the Regional Official Plan Review (“ROPR”).</p> <p>In an effort to provide the most thoughtful and useful input at this stage in the ROPR, Mattamy engaged highly experienced experts to provide input which addresses both broad policy issues and technical matters. To that end, we are attaching the following:</p>	<p>Natural Heritage</p> <p>Regional staff reviewed the submission of the Technical Response Paper prepared by Mr. Hilditch. The submission included statements related to the author’s professional opinion on natural heritage planning as well as general comments. The paper provided an opinion on natural heritage planning in general or commentary on an alternative philosophy to natural heritage planning that should occur within Halton Region. It is important to note that the fundamental principles, goals, and objectives of Halton’s Natural Heritage System are not being reviewed as part of the ROPR. Natural heritage has a central place within the planning vision for Halton as described in the ROP. Within this vision, two concepts feature prominently. The first is “sustainable development”, in which protecting the natural environment is a vital factor. The second is “landscape permanence”, which recognizes that although the Region will urbanize and change, certain landscapes must be preserved permanently. Halton’s NHS is built on the goal to provide a high degree of confidence that the biological diversity and ecological function of the Region of Halton will be preserved and enhanced for future generations that consist of key features, substantial core areas that are connected by function ecological linkages that enhance long-</p>

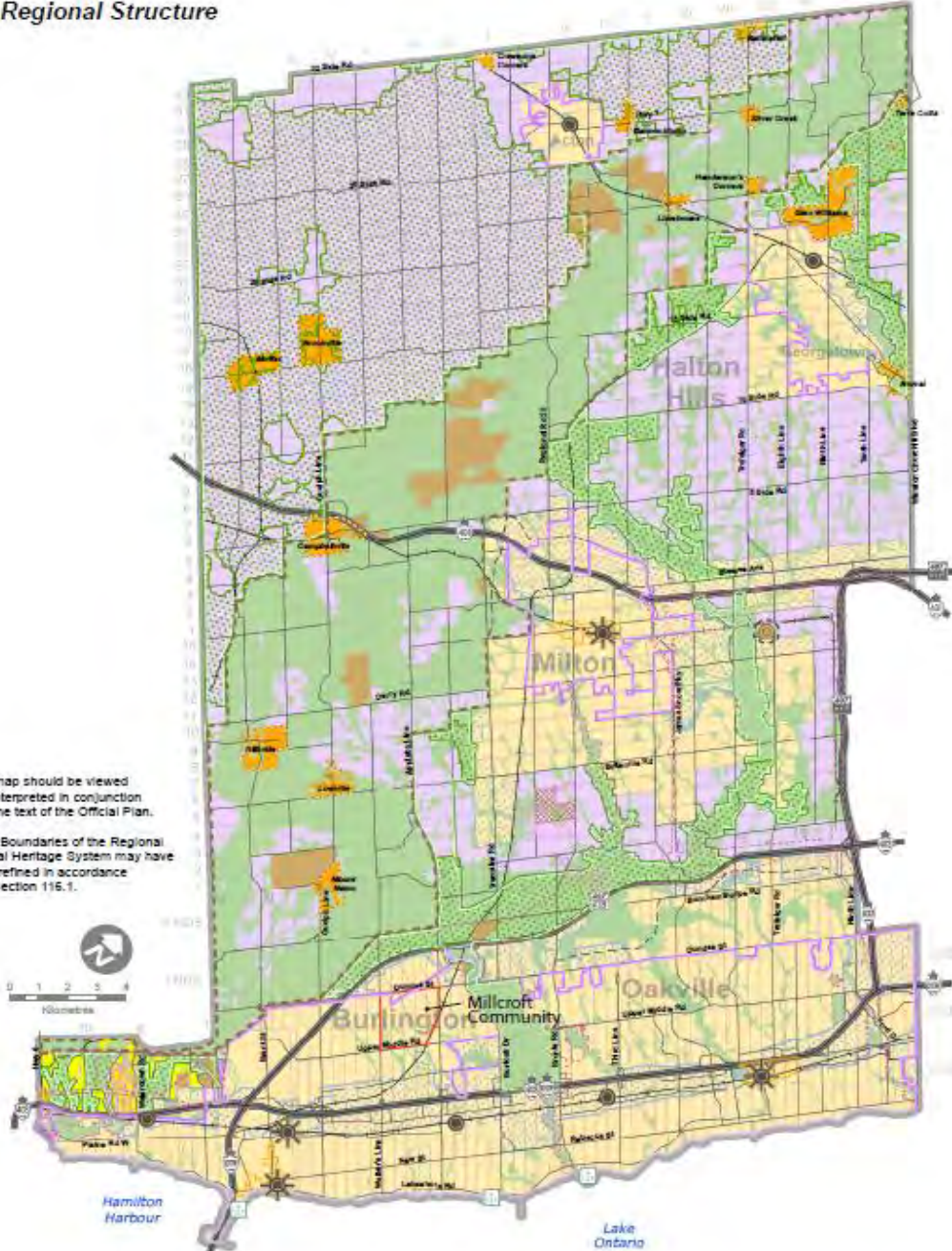
No.	Source	Submission	Response
		<p>1. A submission of Ruth Victor & Associates dated October 30, 2020. Ms. Victor is not only a member of the Canadian Institute of Planners but is also a member of the Royal Town Planning Institute in England. She has some thirty (30) years of professional planning experience. Ms. Victor is the former Manager of Development at the Region of Halton who, in that capacity, conducted the Region's first major growth management exercise in the late 1980s. She does extensive work for both the private and public sectors.</p> <p>2. A <i>Technical Response Paper</i> authored by Tom Hilditch, dated October 28, 2020, which addresses natural heritage issues. Mr. Hilditch is a renowned ecologist with some forty (40) years of experience in a broad array of ecological issues. This has included several appointments to provincial committees, including his work as the Chair of the Species at Risk Program Advisory Committee for many years.</p> <p>3. A submission of urbanMetrics Inc. dated October 22, 2020 which addresses integrated growth management strategy issues. The author, Rowan Faludi, has over twenty-five (25) years' experience in urban economic analysis consulting to both the public and private sectors.</p> <p>4. A submission of Savanta Inc. dated October 29, 2020 which addresses natural heritage issues specific to Mattamy lands in south Georgetown, in the Town of Halton Hills.</p> <p>5. A submission from Turkstra Mazza Associates dated January 2, 2020 which was provided as earlier input into the Regions IGMS growth scenarios.</p> <p>Each of these detailed submissions provide important insights and input into the matters addressed in the Discussion Papers. While Mattamy is pleased to provide these submissions, we are of the view that they should be treated as an invitation for further, direct engagement with Mattamy and Mattamy's team of experts. Certainly, the Region's ongoing ROPR should not be limited to simply receiving and considering the submissions.</p> <p>The ROPR introduces an opportunity for the Region to provide constructive direction to facilitate vibrant, mixed use communities. This direction must reflect and implement provincial policy, including recent amendments to the Growth Plan. This opportunity will only be realized if the Region engages constructively with stakeholders. Mattamy would welcome the opportunity to discuss these issues in detail with staff as the ROPR continues.</p> <p>We respectfully request notice of all future meetings, reports and consultation activities related to the ROPR. Please provide notice directly to this firm and to Mattamy c/o Karen Ford (Karen.Ford@mattamycorp.com).</p> <p>Thank you. Yours truly, Scott Snider</p> <p>See submission attached in Part 7.</p>	<p>term ecological integrity. Although the main principles for Halton's NHS are not being revised, we recognize that there may be merit to provide some further clarification with regards to definitions and identification of key features and components. Policy Direction NH-7 recommends that a guideline is prepared that builds on the existing Regional Official Plan policy framework, Sustainable Halton 3.02 report, and the definitions for linkages, buffers, and enhancements areas to key features. It will provide further direction on the identification of these components, outline approaches that can be used to satisfy the relevant policies, and used to support restoration and enhancement within the Regional Natural Heritage System that can be achieved through development proposals. Furthermore, Policy Direction NH-8 recommends that the Regional Planning staff identify opportunities to address the quality of a woodland through potential updates to the definitions of significant woodland and woodland within the Regional Official Plan. Further, explore opportunities to provide direction within the Regional Official Plan for enhancement and restoration of woodlands that have been impacted by invasive non-native species and/or have experienced severe disturbance due to extreme weather events and the impact of forest pathogens. There will be opportunities to engage with Regional staff on these matters through the Stage 3 Phase 3 ROPA.</p> <p>Regional staff has met and attended a site visit with the landowner to discuss the landowner's recommendations as it relates to the removal of certain NHS components (Linkages and Enhancements) on the Mattamy lands in south Georgetown and to discuss the Minutes of Settlement with Mattamy Homes related to Sustainable Halton (known as ROPA 38) for lands located in the South Milton Urban Expansion Area. Regional staff has also received supplementary information following these meetings with Mattamy Homes and we are still in the process of reviewing the information. We will continue to engage with Mattamy Homes on the draft proposed Natural Heritage System mapping through the Stage 3 Phase 3 ROPA. Detailed e-mail correspondence on the submission can be made available upon request.</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
38.	Millcroft Golf Club - Millcroft Greens	<p>Attached per email dated 2020-10-30</p> <p>Dear Sir:</p> <p>Re: Regional Official Plan Review Natural Heritage Discussion Paper Millcroft Golf Course – Millcroft Greens Comments</p> <p>Macaulay Shiomi Howson Ltd. (MSH) has been retained by Millcroft Golf Course – Millcroft Greens to review and provide comments on the Regional Official Plan Review Natural Heritage Discussion Paper with respect to the Millcroft Community. The following submission provides some background with respect to the Millcroft Community, followed by our comments on key issues relevant to Millcroft Golf Course – Millcroft Greens in the Natural Heritage Discussion Paper.</p> <p><u>1. Millcroft Background</u></p> <p>The Millcroft Community is located in the Urban Area designation in the current Region of Halton Official Plan (ROP) and is largely within the “Built Boundary” (See Map 1 – Regional Structure). However, there are some narrow north/south corridors designated “Regional Natural Heritage System” in the Millcroft Community which generally aligns with the floodplain which traverses the golf course.</p> <p>Given this context, the focus of our comments relates to the implications of the directions in the Natural Heritage System Discussion Paper for the lands in existing Settlement Areas. The current ROP allows refinement of the boundaries of the Regional Natural Heritage System (RNHS) as part of a Planning Act development application which includes an individual Environmental Impact Assessment (EIA) without an amendment to the ROP. It does not establish specific buffer widths or other similar detailed direction. It also does not specifically differentiate between the RNHS in Settlement Areas or outside Settlement Areas; however, the EIA process would allow for assessment of the context.</p> <p><u>2. Natural Heritage Discussion Paper</u></p> <p>The following summarizes the major concerns with the directions identified in the Natural Heritage Discussion Paper.</p> <p>2.1 Regional Natural Heritage System General Approach</p> <p>The key general concern, based on our review, is that the proposed policy directions are premised on a more rigid approach than the current Official Plan including for lands in the existing Settlement Areas such as the Millcroft Community. An approach which does not recognize the fact that there is insufficient, current information available at the Regional-scale to make final decisions on boundaries, features and buffers. In our opinion, as a result, such decisions must be made through a science-based case-by-case analysis. The Regional Plan should establish a general framework for such decisions while recognizing that additional current data is required to make final determinations and that changes have and can occur over time.</p> <p>In this context, too we are concerned that the Natural Heritage Discussion Paper includes discussion on an option to enshrine a new precautionary principle in policy. This is summarized as “when faced with uncertainty, err on the side of being conservative to ensure protection of natural heritage components”. The Discussion Paper notes:</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 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, 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>

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		<p>“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>However, in our opinion, adding specific reference to a precautionary principle in policy would provide a basis for a strict interpretation of the Regional Official Plan Natural Heritage System policies and mapping. This is not appropriate given the concerns with the information on which the policies and mapping are based. There is no justification for the use of the precautionary principle. Rather as noted above a policy framework needs to be established which ensures that decisions re made made through a science-based case-by-case analysis.</p> <p>2.2 Settlement Area Natural Heritage System</p> <p>The Growth Plan Natural Heritage System (NHS) and the Greenbelt Plan NHS policies do not apply to the RNHS in Settlement Areas. The policies for the Growth Plan NHS and the Greenbelt Plan NHS are generally aligned, however there are major differences between the Provincial policies and definitions and those in the current RNHS. These differences will result in significant challenges to combining the Provincial NHSs with the current RNHS policies where they apply to Settlement Areas including lands in the Millcroft Community. As a result, it is recommended that a separate policy approach be taken to the Growth Plan, Greenbelt Plan and Settlement Area NHSs. The approach to the Settlement Area NHS must recognize the urban context including permitted uses and supporting infrastructure. This approach may result in policy duplication but ultimately will provide greater clarity and be easier to implement. This approach is also consistent with Provincial Policy Statement Section 2.1.3 which recognizes that natural heritage systems will vary in size and form in settlement areas, rural areas and prime agricultural areas.</p> <p>2.3 Buffers/Vegetative Protection Zones(VPZs)</p> <p>The Discussion Paper identifies an option to include new policies for minimum buffers or vegetation protection zones for different natural heritage features, as was done for the Growth Plan and the Greenbelt Plan (that apply only outside 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> <p>With respect to Settlement Areas, the inclusion of new policies establishing minimum standards is not appropriate. Determining buffers should be done through a science-based case-by-case analysis taking into account factors such as the type and sensitivity of the feature, the type of adjacent land use, and mitigative measures. Ease of policy implementation does not justify this approach.</p> <p>The current approach to the RNHS and the establishment of features and buffers has generally appeared to serve all stakeholders and should be maintained. The policy framework provides clear direction, but allows flexibility to carry out detailed studies as part of development applications.</p> <p>With respect to the Region’s Buffer Refinement Framework, numerous technical issues have been identified with the content and use of this document. As a result of these concerns, this document should not be reflected in policy or guidelines.</p> <p>Finally, with respect to the approach and definition of the terms “vegetation protection zones” and “buffers”, a number of options are proposed for consideration. These include whether adopting the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>provincial policy approach and terminology to vegetation protection zones can entirely replace the Regional Official Plan approach to buffers; and whether the current definition of vegetation protection zones can be replaced with the new Provincial definition.</p> <p>It is our opinion, that different areas call for different definitions. The current Regional Official Plan uses both terms but for different areas. It is recommended that this approach be maintained as the buffer definition is important and appropriate for application in Settlement Areas. This definition also provides clear direction for buffer determination through future studies based on specific NHS features/sensitivities and adjacent land uses – an approach which is appropriate for Settlement Areas.</p> <p>With respect to uses in buffers, infrastructure including stormwater management facilities, low impact development measures and trails are appropriate for location in buffers subject to criteria. Policy revisions should explicitly permit such uses.</p> <p>2.4 Water Resource System</p> <p>As identified in Section 6 of the Discussion Paper, changes to Provincial policies establish the need to identify a water resource system. However, this system is clearly different from, although it overlaps with, the NHS. In fact, the Province has mapped the NHS for the Growth Plan (Growth Plan Section 4.2.2.1), while the water resource system is to be identified through watershed planning or equivalent, or in the case of designated greenfield areas through a subwatershed plan or equivalent.</p> <p>Option 2 identified in the Discussion Paper which proposes to separate the two systems would be preferred. This will clarify, that different policies govern Key Natural Heritage Features and Key Hydrologic Features versus Key Hydrologic Areas. The inclusion of Key Hydrologic Areas within mapping for the RNHS would be confusing, since they are not protected within the RNHS.</p> <p>In establishing the water resources system, it is not clear that it is necessary to map the system at the Regional scale, given that it is to be identified based on watershed planning. However, similar to the NHS, if the system is mapped, the Regional Plan should establish only a general framework while the policies provide that any final determination is based on detailed studies carried out as part of development applications.</p> <p>In addition, in considering the components of the water resources system, clarity in interpretation of terminology based on detailed consideration of Provincial policy including definitions is necessary. Some of the wording used, and conclusions reached, in the Mapping Audit Technical Memo, if translated into policy, may result in interpretation issues. For instance, “aquifers and unsaturated zones” do not all meet the definition of groundwater features “which are necessary to for the ecological and hydrological integrity of the watershed”, rather the key hydrologic areas definition is much more narrow (i.e. highly vulnerable aquifers). Similarly, headwaters and headwaters catchments do not include headwater drainage features. Further, floodplains are natural hazards which are addressed through a separate policy framework and should not be considered as part of the water resources system</p> <p>2.5 Mapping</p> <p>If the current policy approach to the NHS and to the water resource system, which provides general direction, but allows flexibility to carry out detailed studies as part of development applications to guide any future decisions, is not maintained, then there are serious concerns about the mapping proposed for</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>the updated Official Plan, including any mapping of the water resources system. The mapping is already outdated and it is recommended that the Region undertake to update the current mapping and to maintain it consistently and regularly (yearly). The mapping should be updated to reflect the results of the most recent work undertaken in the Region. This would include detailed work undertaken for Secondary Plan, block plans and plans of subdivision.</p> <p>2.6 Natural Hazards</p> <p>The Discussion Paper suggests three options for the mapping of Natural Hazards. With respect to areas subject to flooding, given that floodplain mapping is not available for all areas of the Region, and that the level of detail of such mapping varies, Option 2 which would show floodplain mapping as an overlay is preferred. Such mapping should make it clear that the mapping is for floodplain areas only. In addition, the policy framework should permit modifications without an amendment to the ROP based on updated or more detailed site-specific studies.</p> <p>With respect to erosion hazard mapping, this is not typically mapped until site specific analysis is carried out. As such, the policies should make it clear that erosion hazards are to be identified during area-specific and/or site-specific studies.</p> <p>We would like to thank the Region for the opportunity to provide comments on the Natural Heritage Discussion Paper. Please contact the undersigned if you wish clarification of these comments.</p> <p>Yours truly,</p> <p>MACAULAY SHIOMI HOWSON LTD. Per: Elizabeth Howson, MCIP, RPP Principal</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p style="text-align: center;">Map 1 <i>Regional Structure</i></p> <p style="text-align: right;">ATTACHMENT 1</p>  <p>This map should be viewed and interpreted in conjunction with the text of the Official Plan.</p> <p>* The Boundaries of the Regional Natural Heritage System may have been refined in accordance with Section 116.1.</p> <p>0 1 2 3 4 Kilometres</p> <p>Hamilton Harbour</p> <p>Lake Ontario</p> <ul style="list-style-type: none"> Waterfront Park (See Map 2) Major Transit Station Proposed Major Transit Station Mobility Hub Rail Line Proposed Major Arterial Major Road Provincial Freeway Lot and Concession Line Municipal Boundary Urban Area Hamlet Agricultural Area Regional Natural Heritage System * Mineral Resource Extraction Area North Aldershot Policy Area Greenbelt Natural Heritage System (Overlay) Greenbelt Plan Protected Countryside Boundary Niagara Escarpment Plan Boundary Parkway Belt West Plan Boundary Built Boundary Employment Area Urban Growth Centre Area Eligible for Urban Servicing Halton Waste Management Site <p style="text-align: right;">June 19, 2018</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
39.	Milton P4 Trafalgar Landowners Group	<p>Attached per email dated 2020-10-30 (SGL Planning)</p> <p>Re: Regional Official Plan Review Discussion Papers Milton P4 Trafalgar Landowner Group Inc. Group Comments</p> <p>SGL Planning & Design is the planning consultant to the Milton P4 Trafalgar Landowners Group Inc. The Milton P4 Trafalgar Landowners Group is comprised of the following landowners:</p> <ul style="list-style-type: none"> • 2076828 Ontario Limited • White Squadron Development Corporation • Frontenac Forest Estates Inc. • Hannover Trafalgar Farms Limited & Milton Sheva Land Limited O/A Hornby Land JV • York Trafalgar Golf Corp. • Comarin Corp. • Remington Trafalgar Inc. <p>Together the landowners group owns approximately 415 hectares in the Trafalgar Corridor Secondary Plan Area. The secondary plan was adopted by the Town of Milton in March 2019 and is currently being reviewed by Region of Halton staff.</p> <p>We have been asked to provide comments, on behalf of the landowners group, 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>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 Trafalgar Corridor, and therefore do not provide 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</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 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>Climate Change</p> <p>Regional staff recognizes the impacts buildings have on greenhouse gas emission levels. Policy Direction CC-5 recommends the introduction of new policies in the ROP that encourage the local municipalities to introduce and 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 are also exploring the development of a best practices resource for green development standards which local municipalities may consider when introducing and/or updating their standards. Regional staff recognize the work the local municipalities have undergone in the development of their own green development standards and will continue to support local work on green development standards where appropriate, rather than embedding these standards into ROP policy.</p>

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		<p>area-specific or site-specific studies. Further, it is the Milton P4 Trafalgar Landowners Group'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> <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 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>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</p>	<p>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>Suggestions to incorporate green infrastructure into the ROP are reflected in Policy Direction CC-3 which recommends the incorporation of green infrastructure and low impact development with stormwater management planning.</p> <p>Addressing climate change in the context of agriculture is proposed through Policy Direction CC-7 which focuses on agriculture, urban agriculture, local food supply, food security, and farmers as stewards in mitigating and adapting to climate change. Climate change lenses applied to Policy Directions in the Rural and Agricultural and Natural Heritage theme areas (RAS-1 and NH-7) speak to the importance of lands in the rural area for their carbon sequestration potential.</p> <p>The ROP includes sections and policies which support public transit, active transportation, travel demand management, and reducing single-occupancy vehicle usage (sections 172 and 173). Through Policy Direction CC-1, which supports enhancing the ROP's current vision, goals, objectives, policies, and definitions, there are opportunities to consider strengthening public transit policies to support electrification, as well as enhance active transportation policies.</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>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</p>

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		<p>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>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 style="padding-left: 40px;">"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>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>Natural Heritage</p> <p>Thank you for the detailed submission. 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. Although the main principles for Halton's NHS are not being revised, we recognize that there may be merit to provide some further clarification with regards to definitions and identification of key features and components. 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>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 has been undertaken thus far. The Policy Directions Report will describe key areas where changes to the Regional Official Plan are proposed.</p> <p>Regional staff notes 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, stakeholders, and agencies. More fulsome details are available in the Policy Directions Report. 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;

No.	Source	Submission	Response
		<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 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>The Milton Phase 4 Trafalgar Landowners Group, 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 the Milton P4 Trafalgar Landowners Group's position that the Buffer Refinement Framework should not be incorporated in policy or in any guidelines.</p> <ul style="list-style-type: none"> • 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</p>	<ul style="list-style-type: none"> • updating policies to conform to the three Source Protection Plans that apply to Halton Region; and • 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>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. As noted above, 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.</p>

No.	Source	Submission	Response
		<p>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>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>A Natural Heritage Strategy is not necessary in a Settlement Area. When greenfield lands are developed, the natural heritage system will be dedicated to the local municipality. Any Natural Heritage Strategy should be determined at a local level by the area municipalities where site specific conditions and overall local planning objectives can be fully considered.</p> <p>7. Should the ROP incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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 Regionwide 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 Discussion Paper implies that consideration should be given to provide greater protection to woodlands characterized by invasive tree species. <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>“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. 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 subcanopy 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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="margin-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>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> 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>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>a. Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</p> <p>b. Are there any additional pros and cons that could be identified for any of the options?</p> <p>c. Do you have a preferred mapping option? If so, why?</p> <p>No comment.</p> <p>2. Agriculture-related uses</p> <p>a. 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>b. What additional conditions or restrictions should be required for any agriculture related uses?</p> <p>c. Should some uses only be permitted in the Rural Area as opposed to Prime Agricultural Lands?</p> <p>No comment.</p> <p>3. On-farm diversified uses</p> <p>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?</p> <p>b. What additional conditions or restrictions should be required for any on-farm diversified uses?</p> <p>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> <p>No comment.</p> <p>4. To what extent should the updated ROP permit cemeteries in:</p> <p>a. Urban Areas</p> <p>b. Rural Areas</p> <p>c. Prime Agricultural Areas</p> <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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>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</p> <p>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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>No comment.</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>No comment.</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>No comment.</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. MTSAAs 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, MTSAAs and other key intensification areas to attract</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>It is unclear what a multi-purpose road is. All roads should be considered multi-purpose. 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>No comment.</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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>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 Designated Greenfield 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>No comment.</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 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. However, the Region still has a role to plan in the design</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>6. 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>7. 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>8. 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>9. 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.</p> <p>Paul Lowes, MES, MCIP, RPP Principal</p> <p>ATTACHMENT A Region of Halton Official Plan Review Natural Heritage Discussion Paper and Supporting Technical Documents Milton P4 Trafalgar Landowners Group</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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>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 the Milton P4 Trafalgar Landowners Group, 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 style="padding-left: 40px;">“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 NHS mapping was undertaken to recognize planning decisions and updated information since</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>ROPA 38 and this includes OMB decisions, approved planning applications, special Council Permits and staff refinements based on infield 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 sitespecific levels. In addition to the NHDP, several of the Technical Memos noted above addressed RNHS mapping matters.</p> <p>The Milton P4 Trafalgar landowners and their consulting team have reviewed the draft 2019 RNHS mapping within and adjacent to the Trafalgar Secondary Plan area. We offer the following comments for your consideration when updating the RNHS mapping:</p> <p>a) <u>Baseline Data for RNHS Updates</u> - 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 Milton P4 Trafalgar Landowners Group based on recommendations from the Milton Urban Expansion Area Subwatershed Study.</p> <p>b) <u>Revisions to Digital Mapping</u> – 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) <u>Mapping of Buffers, Linkages and Enhancement Areas</u> – 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 Trafalgar Corridor lands. If completed for these lands, we request a digital version for review as soon as possible.</p> <p>d) <u>Use of Proxy Data for RNHS Mapping</u> – 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 Milton Phase 4 lands.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>e) <u>No Growth Plan NHS in Settlement Areas</u> – 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 Trafalgar Corridor Secondary Plan Area south 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) <u>Owner Requested Changes to the 2019 RNHS</u> - Only very minor changes appear to be made to the RNHS on the Trafalgar Corridor lands.</p> <p>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> <ol 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 a. 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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>on a substantial amount of field data collected between 2015 and 2017 (with data collected from 2018 to current to be incorporated in future 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>For the Region's reference, we have assembled a package of information to support revisions to the RNHS to match the SWS NHS, specifically with respect to areas of the existing RNHS that have been recommended for deletion. The attached package (Attachment C) includes an overall map identifying those areas that the SWS NHS recommends for deletion and a table that provides more information on each area, including references to appropriate sections of the Draft Final Phase 4 SWS and rationale for each deletion. Based on this current data, it is appropriate to make these refinements to the RNHS mapping now. To assist with RNHS revisions, digital drawing files will be forwarded to Regional staff. 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>The Milton P4 Trafalgar Landowners Group 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.” <p>The Growth Plan also states that, “Water resource systems will be identified to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions”.</p> <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. <u>The water resource system will comprise key hydrologic features and key hydrologic</u></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p><u>areas</u>". [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 • 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 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>permanent and intermittent stream definitions. Therefore, to prevent confusion the term “discharge areas” should not be used.</p> <ul style="list-style-type: none"> • 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>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</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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> <p>a) we echo the Technical Memo comments that 'the characteristics and limitations of the mapping need to be understood to enable appropriate interpretation',</p> <p>b) 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 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>c) 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>The Best Practices Technical Memo suggests that consideration be given to permissions to locate SWM facilities in linkages and enhancement areas.</p> <p>The Milton P4 Trafalgar 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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>G. <u>Buffers and Vegetation Protection Zones</u></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 buffer uses/activities. 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">ATTACHMENT B</p> <hr/> <p style="text-align: center;">Email Correspondence Re: MNR Policy Interpretation – Significant Woodlands Region of Halton Official Plan Review Milton P4 Trafalgar Landowners Group</p> <p style="text-align: right;">October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Nancy Mather</p> <hr/> <p>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</p> <p>For your information:</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>Begin forwarded message:</p> <p>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></p> <p>Thank you very much for addressing this so rapidly Emily.</p> <p>Kindest 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>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>SAVANTA INC. 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 (MNRF) <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 50 Woodbine Valley Road, Aurora, ON L4G 8L8 emily.funnell@ontario.ca 905-713-7400</p> <p><image001.png></p> <p>From: Tom Hilditch <tomhilditch@savanta.ca> Sent: Thursday, December 13, 2018 12:49 PM To: Allan, Brad (MNRF) <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>

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		<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). 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. 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>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p style="text-align: center;">ATTACHMENT C</p> <hr style="width: 30%; margin: auto;"/> <p style="text-align: center;">Recommended Changes to Draft 2019 RNHS Mapping Region of Halton Official Plan Review Milton P4 Trafalgar Landowners Group</p> <p style="text-align: right;">October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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40.	Milton Phase 3 (MP3) Landowners Group	<p>Attached per email dated 2020-10-30</p> <p>Re: Regional Official Plan Review Discussion Papers – Milton Phase 3 Landowners Group Inc.</p> <p>Dear Chair Carr and Members of Council,</p> <p>We are writing to you on behalf of the Milton Phase 3 Landowners Group Inc. (“MP3”). The members of MP3 are set out in the list attached to this letter and own lands within the Boyne Survey Secondary Plan area located within the Town of Milton. The following represents the Landowners group’s response to the Region of Halton’s Discussion Papers associated with the ROPR process.</p> <p>As you are likely aware, the Boyne Survey Secondary Plan was Approved on July 24th, 2017. Through this letter, MP3 would like to formally request that the NHS for the Boyne Survey Lands continues to reflect what is contained within the approved Boyne Survey Secondary Plan, as well as any subsequent adjustments through the various approved and/or ongoing Subwatershed Impact Studies or subsequent area specific studies. We also request that the ROPA’s NHS mapping is continued to be updated to reflect all planning approvals up to the ROP approval date.</p> <p>Please continue to keep MP3 apprised throughout this ROPR process and should you have any questions or comments please do not hesitate to contact the undersigned.</p> <p>Lukas Reale</p>	<p>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. 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>
41.	Milton Phase 4 (MP4) West Landowners Group	<p>Attached per email dated 2020-10-30 (MHBC)</p> <p>RE: Region of Halton Urban Structure Discussion Paper MP4 West Landowners Group Comments</p> <p>Overview – Britannia West lands and the Britannia Secondary Plan</p> <p>MHBC Planning is currently retained by the Milton Phase 4 (MP4) West Landowners Group, who have extensive land holdings in the Milton Phase 4 Urban Expansion Area, also known as the Britannia Secondary Plan Area in the Town of Milton. The Britannia Secondary Plan Area is located within the Urban Area of the Town of Milton and comprises approximately 900 hectares of developable land. The Town has now commenced the Britannia Secondary Plan study.</p> <p>Regional Official Plan Review</p> <p>It is our understanding that Halton Region are currently undertaking a Regional Official Plan Review in accordance with Provincial requirements and are currently in Phase 2 of the process which is intended to inform the development of updated Regional Official Plan policies. On July 8, 2020, Regional staff presented a series of five Discussion Papers intended to explore policy options on several themes of the Regional Official Plan. These include:</p>	<p>Natural Heritage</p> <p>Thank you for the detailed submission. 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. Although the main principles for Halton’s NHS are not being revised, we recognize that there may be merit to provide some further clarification with regards to definitions and identification of key features and components. 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>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 has been undertaken</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Regional Urban Structure; • Rural and Agricultural Systems; • Natural Heritage System; • Climate Change; and, • North Aldershot Planning Area. <p>The MP4 West Landowners Group’s consulting team have reviewed the Regional Official Plan Review Discussion Papers and offer the following comments in response to the Technical Discussion Questions within the Regional Urban Structure Discussion Paper that are applicable to the Britannia Secondary Plan area. These comments have been prepared by MHBC and urbanMetrics. We would also note that we agree with the comments provided by the Town of Milton to the Region as set out in their staff report DS-035-20 dated September 21, 2020. A separate response will be forwarded by the MP4 West Landowners Group in response to the Natural Heritage System Discussion Paper.</p> <p>Responses to the Questions in the Regional Urban Structure Discussion Paper</p> <p>Question 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? If so, should minimum density targets be assigned to them?</p> <p>Response: The nature of corridors is such that they are long and greatly vary in context depending on the location along the corridor. Higher density uses cannot always be supported along the entire length of a corridor, and implementation of a Strategic Growth Area along an entire corridor could undermine planning within the local context. Local context should determine corridor and nodal planning at the local level, not at the Regional level. Similarly, minimum density targets along an entire corridor may not respect variation and local context along the corridor, as density and built form typically increases in proximity to transit and is dependent on the mode of transit. The local municipality is the appropriate planning body to plan for local corridors and nodes, including the application of minimum density targets to ensure that local context is taken into account and there is an appropriate variation in land uses and built form based on physical context.</p> <p>It is also important to recognize that, as per the recently amended Growth Plan, the market must also be recognized as a factor in municipal growth management and planning. Minimum density targets along corridors could impact the ability of planned Strategic Growth Areas, including Urban Growth Centres and Major Transit Station Areas, as well as brownfield and greyfield sites, to attract growth and achieve their planned densities.</p> <p>Question 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>Response: No, the implementation of a Transit Priority Corridor along Britannia Road within the Region as recommended within the Urban Structure Discussion Paper, while a positive objective, would be premature in relation to the current status of planning for the Britannia Secondary Plan Area lands. The Britannia Secondary Plan Area will not be able to support transit-oriented development with HOV and transit lanes without an accompanying Regional Transit Plan and Transportation Master Plan that appropriately directs Regional transit and transportation development. This is also most appropriately addressed at the Secondary Plan stage and through the Britannia Secondary Plan study.</p>	<p>thus far. The Policy Directions Report will describe key areas where changes to the Regional Official Plan are proposed.</p> <p>Regional staff notes 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, stakeholders, and agencies. More fulsome details are available in the Policy Directions Report. 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; and • 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>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. As noted above, 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.</p>

No.	Source	Submission	Response
		<p>Additional densities along multi-purpose and minor arterial roads could also undermine the housing market for Strategic Growth Areas. Higher densities along multi-use and minor arterial roadways could also influence housing types, which could impair the ability of local municipalities to achieve a proper housing balance at the neighbourhood and community level.</p> <p>Question 8: Are there any nodes in Halton that should be identified within the Regional Official Plan from a growth or mobility perspective? 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>Response: The Regional Official Plan should not identify additional strategic nodes or pre-determine their function and density for local areas ahead of local planning. The policy framework established within the Regional Official Plan should clearly recognize the importance of local planning and local context, such as the approved local urban structure in conformity with Provincial policy. Delineation of strategic nodes requires further analysis outside of the scope of the Regional Official Plan, including the study of the local urban structure. While there is clear need for both the Regional and local urban structures to align, the Region should not restrict or preclude flexibility for local plans to reflect local conditions.</p> <p>Question 11: How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p> <p>Response: The Regional Official Plan needs to be grounded on a sound economic development strategy that identifies the type of employment that can realistically be attracted to the Region together with their land and locational needs. Furthermore, the Official Plan needs to recognize the significant changes that are occurring in the commercial sector stemming from the rapid rise in e-commerce, which has also been accelerated by the COVID-19 pandemic. Retailing, warehousing and distribution are becoming more closely intertwined. In the United States, parts of shopping centres are being converted to distribution centres and many retailers are converting previous in-store space to on-line order fulfillment centres. A number of retailers and food service operators are now leasing industrial space for distribution and food preparation for direct delivery to customers. These activities have different locational and land need requirements than provided by previous commercial policy hierarchies. Similarly, the dynamics of office development have changed considerably. Outside of established office nodes, the cost of office development frequently needs to be subsidized through mixed-use developments. Stand-alone office buildings are simply not viable in many locations, regardless of Official Plan designations. In general, an Official Plan needs to be grounded on reliable research and needs to be able to provide the flexibility businesses require in the changing environment.</p> <p>Question 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>Response: The Regional Official Plan should ensure that new communities are diverse, and not constrained by employment-only lands and policy areas. The Region should provide flexibility in the policies of the Regional Official Plan to ensure that a mix of uses can be achieved as determined through local context and policy, including local commercial uses.</p> <p>Question 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Response: The Region appears to recommend an approach to limit any boundary expansions outside of the Municipal Comprehensive Review process even though the Growth Plan permits consideration of these expansions. As permitted in the Growth Plan, the Regional Official Plan should permit small boundary expansions outside of the Municipal Comprehensive Review process where such expansions can provide for the most efficient land use and support more efficient servicing locations (such as stormwater management pond locations). As previously stated, local context is critical to ensure that efficient land uses are not restricted by Regional policy where permitted at the Provincial policy level and supported by the local municipality. The opportunity to address minor boundary adjustments and expansions through the Secondary Plan process should not be precluded by Regional policy. The Growth Plan and the recent changes implemented to it require that municipalities consider market demand in their application of the population and employment forecasts (now to 2051), and in the preparation of municipal comprehensive reviews. While the Halton Growth Scenario's report does contain a number of paragraphs addressing market conditions, the Region's Assessment Criteria shown on Figure 25 of the Urban Structure Discussion Paper, to be used to evaluate the need for a settlement boundary expansion and where it should occur, omits any aspect of market consideration. In our opinion, the assessment growth criteria need to be revised to consider market factors as required by the Growth Plan.</p> <p>Furthermore, the recent amendment to the Growth Plan, not considered in the Discussion Paper, requires growth to be addressed to 2051 and states that municipalities can plan to exceed the minimum growth targets set for 2051. The growth considerations by the Region need to be revised and updated to accommodate the recent amendment. Again, we support the Town of Milton's position to provide for more comprehensive growth planning to 2051 and their request as set out in PD-023-18 regarding Settlement Area boundary expansions.</p> <p>Question 15: What factors are important for the Region to consider in setting a minimum Designated Greenfield Area density target for Halton Region as a 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>Response: A Place to Grow 2020 requires that a market-based approach to housing be implemented to address growth. The Region should use a market-based supply of housing and achieve the minimum Designated Greenfield Area density target set by the Province. The Region should not implement any modifications to the minimum Designated Greenfield Area density target. The minimum density targets are to be addressed through local Secondary Plan processes as such a change would alter the unit mix away from a market-based housing supply as required by the Growth Plan.</p> <p>Question 16: Are there any additional considerations or trends that Halton Region should review in terms of the Regional Urban Structure component of the ROPR?</p> <p>Response: In addition to the comments conveyed in the responses to the noted questions herein, we would also recommend the Region consider policies to provide for the ability to allow infrastructure, including Stormwater Management facilities to be located within the Greenbelt as permitted by Provincial policy. Providing for the location of such infrastructure in the most effective and efficient technical location to serve adjacent development areas is consistent with Provincial policy.</p> <p>In addition, consideration should be given to create the efficient use of land for public parks outside of Settlement Areas. Where there are opportunities to provide for public parks outside of the urban</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>boundary, greater flexibility should be considered in Regional policies to address the need for parkland given the challenges to accommodate large park areas within the Settlement Areas.</p> <p>Thank you for the opportunity to provide input on the Urban Structure Discussion Paper. Please do not hesitate to contact us should you have any questions.</p> <p>Yours truly,</p> <p>MHBC</p> <p>Dana Anderson, MA, FCIP, RPP Partner</p> <hr/> <p>Attached per email dated 2020-10-30</p> <p>Dear Chair Carr and Members of Council:</p> <p>RE: Region of Halton Natural Heritage Discussion Paper MP4 West Landowners Group Comments</p> <p>Overview – Britannia West lands and the Britannia Secondary Plan</p> <p>MHBC Planning is currently retained by the Milton Phase 4 (MP4) West Landowners Group, who have extensive land holdings in the Milton Phase 4 Urban Expansion Area, also known as the Britannia Secondary Plan Area in the Town of Milton. The Britannia Secondary Plan Area is located within the Urban Area of the Town of Milton and comprises approximately 900 hectares of developable land. The Town has now commenced the Britannia Secondary Plan study.</p> <p>Regional Official Plan Review</p> <p>It is our understanding that Halton Region are currently undertaking a Regional Official Plan Review in accordance with Provincial requirements and are currently in Phase 2 of the process which is intended to inform the development of updated Regional Official Plan policies. On July 8, 2020, Regional staff presented a series of five Discussion Papers intended to explore policy options on several themes of the Regional Official Plan. These include:</p> <ul style="list-style-type: none"> • Regional Urban Structure; • Rural and Agricultural Systems; • Natural Heritage System; • Climate Change; and, • North Aldershot Planning Area. <p>The MP4 West Landowners Group’s consulting team have reviewed the Regional Official Plan Review Discussion Papers and offer the following comments in response to the Technical Discussion Questions within the Natural Heritage Discussion Paper (“NHDP”) that are applicable to the Britannia Secondary Plan lands. These comments have been prepared by Savanta Inc., R.J. Burnside & Associates, Stonybrook Consulting, and MHBC. A separate response will be forwarded by the MP4 West Landowners Group in response to the Urban Structure Discussion Paper. Additional comments are provided in Attachments A, B, and C attached hereto.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Responses to the Questions in the Natural Heritage Discussion Paper</p> <p>Question 1: As required by the Growth Plan, 2019, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan (“ROP”). Based on the three (3) options discussed above, what is the best approach to incorporate the Natural Heritage System Growth Plan (“NHSGP”) into the ROP?</p> <p>Response: The Natural Heritage System for the Growth Plan and the Greenbelt Plan do not apply within Settlement Areas. While the Growth Plan and Greenbelt Plan Natural Heritage System policies are generally aligned, further combining with the differing policies, permissions, terminology and definitions in the current Regional Natural Heritage System would introduce significant challenges where they apply to Settlement Areas. Any approach to implementing the NHSGP must preserve the policy structure and content applicable to Settlement Areas to ensure appropriate permissions that recognize urban uses and supporting infrastructure which furthers the growth objectives of the Growth Plan.</p> <p>Section 2.1.3 of the PPS states that “Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in Settlement Areas, Rural Areas, and Prime Agricultural Areas.” This policy supports separate policy approaches to the Growth Plan, Greenbelt Plan, and Settlement Area NHS.</p> <p>With respect to development within the Urban Area, we suggest that policy would be clearer to understand and easier to implement if there was a specific set of NHS policies maintained for Settlement Areas in the ROP rather than combining them in anyway with the Growth Plan and Greenbelt Plan NHS. As such, we agree with the Town of Milton’s response that the RNHS should be maintained to provide a clear distinction to allow flexibility for policies that reflect local considerations and avoiding a one size fits all framework at an unworkable scale.</p> <p>Question 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>Response: 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 NHDP 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 NHDP includes discussion on an option to enshrine a new precautionary principle in policy. With respect to Section 114, the NHDP notes:</p> <p><i>“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”.</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The MP4 West Landowners Group does not support adding specific reference to a precautionary principle to ROP policy. Current ROP RNHS policies and mapping provide direction on the protection 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>Question 3: Based on the discussion provided above, to ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?</p> <p>Response: The NHDP discusses an option to include new policies for minimum buffers or vegetation protection zones for different natural heritage feature types, as is done in the Greenbelt Plan and Growth Plan NHS (and 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 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>The Milton Phase 4 Landowners Group, including the Milton Phase 4 (West), and Trafalgar and Agerton Landowners, have 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 the MP4 West Landowners Group position that the Buffer Refinement Framework should not be incorporated in policy or into any guidelines.</p> • 30m Buffers - We note the comment in the Background Review Technical Memo to the NHDP 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. 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 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>policy and therefore, they should not be a 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 uses and contexts are better understood, and they can then be appropriately identified along with other appropriate mitigation measures and balanced with all aspects of creating complete communities.</p> <p>Question 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?</p> <p>Response: We are in agreement with the response provided by the Town of Milton on this question. Mapping Option 1 is preferred due to its conformity with Provincial direction and overall transparency in approach. Option 1 provides for the most effective, and least complex approach in communicating the importance of the Agricultural System. The use of an overlay rather than a designation places equal emphasis on the protection of the NHS and Agricultural System.</p> <p>Question 5: The Greenbelt Plan 2017 and Growth Plan 2019 require municipalities to identify a Water Resource System (WRS) in Official Plans. Based on the two (2) options presented, how should the WRS be incorporated into the ROP? 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>Response: The NHDP 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 NHDP 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 NHDP (addressing these systems separately) is preferred.</p> <p>Based on our review of the Technical Memos, we have several other comments on the WRS. See Attachment A for comments on the Technical Memos.</p> <p>Question 8: The ROP 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>Response: 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 the policies that apply to specific geographic areas. The Source Protection Plans also identify those policies which must be incorporated into Official Plan and Zoning By-laws. For the areas subject to the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Source Protection Plan policies, the preferred implementation approach is that the Official Plan identify these areas as being subject to the applicable Source Protection Plan, and direct the user of the Official Plan to where they can find the full Source Water Protection Plan and amend the Official Plan only as required by Source Protection Plan policies 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>Question 9: The ROP is required to conform to the updated Natural Hazards policies in the PPS. What is the best approach to incorporate Natural Hazards policies and mapping?</p> <p>Response: Natural Hazards in the PPS include hazardous lands, flooding hazards, erosion hazards, dynamic beach hazards and wildland fire. We recognize that changes are needed to the ROP to incorporate direction from the PPS. The NHDP outlines three options for mapping of Natural Hazards 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 regarding the accuracy of the mapping. In many cases, they overlap with other NHS components and, unlike some NHS components may be modified, sometimes substantially. Conservation Authorities may issue permits for development and site alteration in floodplains. Therefore, if mapped at a regional scale, floodplains should be an overlay and policies should clearly permit modifications to floodplains based on site specific studies.</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 even local municipal scale and therefore should not be included in any regional mapping.</p> <p>Question 10: How can Halton Region best support the protection and enhancement of significant woodlands, through land use policy? The ROP 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>Response: The NHDP 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 NHDP 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 NHDP 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 NHDP 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 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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 NHDP 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 NHDP:</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 is not supported.</p> <ul style="list-style-type: none"> • Woodland Changes - The NHDP 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</p> 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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>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> <p>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) that refers to forest patches over 99 years old (<i>italics added for emphasis</i>). ‘Patch’ is not defined in the ROP. The wording should be clarified (i.e., the Woodland contains an abundant amount of native trees over 99 years old).</p> <p>Question 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>Response: Based on review of the five Technical Memos, additional comments are provided in Attachment A for consideration when preparing future updated 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 as discussed in the Technical Memos.</p> <p>Thank you for the opportunity to provide input on the Natural Heritage Discussion Paper. Please do not hesitate to contact us should you have any questions or require clarification of our comments on behalf of the MP4 West Landowners Group</p> <p>Yours truly,</p> <p>MHBC</p> <p>Dana Anderson, MA, FCIP, RPP Partner</p> <p>ATTACHMENT A Region Official Plan Review Natural Heritage Discussion Paper and Supporting Technical DocumentsMilton Phase 4 (West) Landowners Group</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 the Milton Phase 4 (West) Landowners Group (‘MP4</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>West'), 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 MHBC 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 style="padding-left: 40px;">“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 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<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 MP4 West landowners and their consulting team have reviewed the draft 2019 RNHS mapping within and adjacent to the Britannia Secondary Plan area. We offer the following comments for your consideration when updating the RNHS mapping:</p> <p>a) <u>Baseline Data for RNHS Updates</u> - 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 MP4 West Landowners Group based on recommendations from the Milton Urban Expansion Area Subwatershed Study.</p> <p>b) <u>Revisions to Digital Mapping</u> – 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) <u>Mapping of Buffers, Linkages and Enhancement Areas</u> – 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 Britannia Secondary Plan area. If completed for these lands, we request a digital version for review as soon as possible.</p> <p>d) <u>Use of Proxy Data for RNHS Mapping Updates</u> – 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 Britannia Secondary Plan area.</p> <p>e) <u>Owner Requested Changes to the 2019 RNHS</u> - Only very minor changes appear to be made to the RNHS on the Britannia Secondary Plan area.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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> <ol 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, 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 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>For the Region’s reference, we have assembled a package of information to support revisions to the RNHS to match the SWS NHS, specifically with respect to areas of the existing RNHS that have been recommended for deletion. The attached package (Attachment C) includes an overall map identifying those areas that the SWS NHS recommends for deletion and a table that provides more information on each area, including references to appropriate sections of the Draft Final Phase 4 SWS and rationale for each deletion. For some areas, screenshots of existing ROPA 38 mapping (from the Region’s online viewer) are provided with mark-ups and annotations added to</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>identify the area that should be deleted. Based on this current data, it is appropriate to make these refinements to the RNHS mapping now. To assist with RNHS revisions, digital drawing files will be forwarded to Regional staff.</p> <p>The MP4 West Landowners Group 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.” <p>The Growth Plan also states that, “Water resource systems will be identified to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions”.</p> <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 • Seepage areas and springs • Wetlands <p>Key hydrologic areas:</p> <ul style="list-style-type: none"> • Significant groundwater recharge areas • Highly vulnerable aquifers 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • 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 MHBC 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 r 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 regionalmapping, 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 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>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 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>f) 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>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><u>D. SWM Facilities Permissions in the RNHS</u></p> <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 MP4 West 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,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>linkages and enhancement areas are each located everywhere shown. The 2009 Report supports this interpretation. Enhancements to Key Features should be assessed during area-specific and/or site-specific studies.</p> <p>G. <u>Buffers and Vegetation Protection Zones</u> 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 buffer uses/activities. 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 Milton Phase 4 (West) Landowners Group October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Nancy Mather</p> <hr/> <p>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</p> <p>For your information.</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>Begin forwarded message:</p> <p>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></p> <p>Thank you very much for addressing this so rapidly Emily.</p> <p>Kindest 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 style="text-align: center;">1</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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 (MNRF) <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 50 Bloomington Road, Aurora ON L4G 0L8 emily.funnell@ontario.ca 905.713.7404</p> <p><image001.png></p> <p>From: Tom Hilditch <tomhilditch@savanta.ca> Sent: Thursday, December 13, 2018 12:49 PM To: Allan, Brad (MNRF) <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 MNRF 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. MNRF Aurora has asked that the Renewable Energy Projects Guide be applied to residential development projects - included in this direction is MNRF'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). 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. 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 style="text-align: center;">3</p> <p>ATTACHMENT C Recommended Changes to Draft 2019 RNHS Mapping Region of Halton Official Plan Review Milton Phase 4 (West) Landowners Group October 30, 2020</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response																				
		<p>ATTACHMENT C Recommended Changes to Draft 2019 RNHS Mapping Regional Official Plan Review Milton Phase 4 (West) Landowners Group, Britannia West Secondary Plan Area</p> <table border="1" data-bbox="677 415 1942 1201"> <thead> <tr> <th data-bbox="677 415 823 459">Area (See Figure 1)</th> <th data-bbox="823 415 941 459">Property Identifier</th> <th data-bbox="941 415 1174 459">Participating Landowner</th> <th data-bbox="1174 415 1942 459">Rationale for RNHS Change (References to Maps and Tables are from the Draft Final Phase 4 SWS Report, May 2020)</th> </tr> </thead> <tbody> <tr> <td data-bbox="677 459 823 586">1</td> <td data-bbox="823 459 941 586">P1 P83 N53</td> <td data-bbox="941 459 1174 586">Hadfield/York Trafalgar Codroy Development N/A</td> <td data-bbox="1174 459 1942 586"> <ul style="list-style-type: none"> Map T3-1 identifies this area for removal from the NHS (ref: ID BF13 & BB10) Table 2.4.11 indicates that location BF13 does not contain any Key Features and therefore, this area should be removed from the RNHS Table 2.4.12 indicates that location BB10 does not contain any Key Features and therefore, the buffer mapped in the ROPA 38 RNHS should be removed </td> </tr> <tr> <td data-bbox="677 586 823 735">2</td> <td data-bbox="823 586 941 735">P77 P83 N53</td> <td data-bbox="941 586 1174 735">Tahlequa Holdings Inc. 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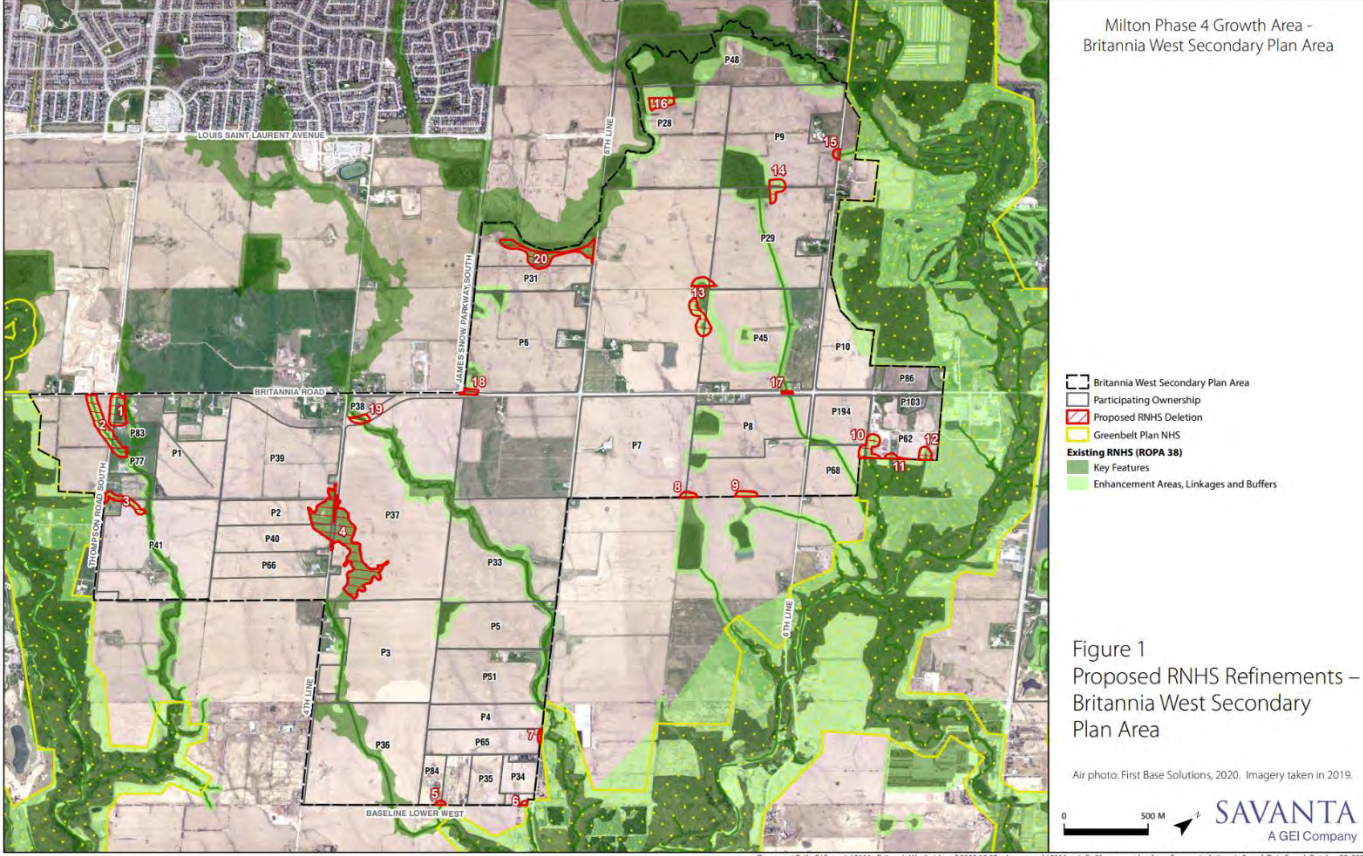
No.	Source	Submission				Response	
		Area (See Figure 1)	Property Identifier	Participating Landowner	Rationale for RNHS Change (References to Maps and Tables are from the Draft Final Phase 4 SWS Report, May 2020)	Comments are acknowledged. Please see above for a detailed response.	
5	P84	Cedar Brown South Milton Inc.		N96	N/A		<ul style="list-style-type: none"> There are no Key Features in this area, as shown on Map T3-1 Figure M-4f identifies this area, as well as the area on the downstream side of Lower Baseline as consisting of an HDF with a Final Management Recommendation of Mitigation, which is not a component of the RNHS Map T2-2 identifies this area as a "Potential NHS Refinement Area" ROPA 38 appears to have mapped this area as part of the buffer to the drainage feature on the downstream side of Lower Baseline (see attached screen capture from the Region's Draft 2019 RNHS mapping). However, as a Mitigation HDF, this is not a Key Feature and therefore, this buffer should be deleted from the RNHS
6	N	N/A					<ul style="list-style-type: none"> This area contains no Key Features as shown on Map T3-1 and it is located outside the Greenbelt Plan boundary The area appears to have been originally mapped in the ROPA 38 RNHS as a buffer from the watercourse that is mapped as originating just south of Lower Baseline Road (see attached screen capture from the Region's Draft 2019 RNHS mapping) Map T2-2 identifies this area as a "Potential NHS Refinement Area" Given that there are no identified Key Features and this area appears to have originally been mapped as a buffer for a watercourse originating across the road, this area should be deleted from the RNHS
7	P65	Casape Development (BT) inc.					<ul style="list-style-type: none"> Map T3-1 identifies this area for removal from the NHS (ref: ID BB07) Table 2.4.12 indicates that there are Key Features on the east side of Fifth Line and that the RNHS buffer from those Key Features that crosses Fifth Line should be removed from the RNHS. There are no Key Features of the RNHS present in this area. Map F4 shows an erosion hazard in this location. However, this area is separated from the stream to the east by Fifth Line and therefore, an erosion hazard would not extend west of Fifth Line.
8	P7	Mattamy (Milton East) Limited		N58	N/A		<ul style="list-style-type: none"> The area appears to have been mapped in the ROPA 38 NHS as a buffer to a Key Feature (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer) However, Map T3-1 identifies the Key Feature (ref: ID BF33) in this general area to have a different shape than shown in the ROPA 38 RNHS mapping, with the mapped Key Feature being greater than 30 m from the Secondary Plan Area boundary Table 2.4.11 indicates that the Key Feature designation in this area (BF33) should be removed where it intersects the Secondary Plan Area

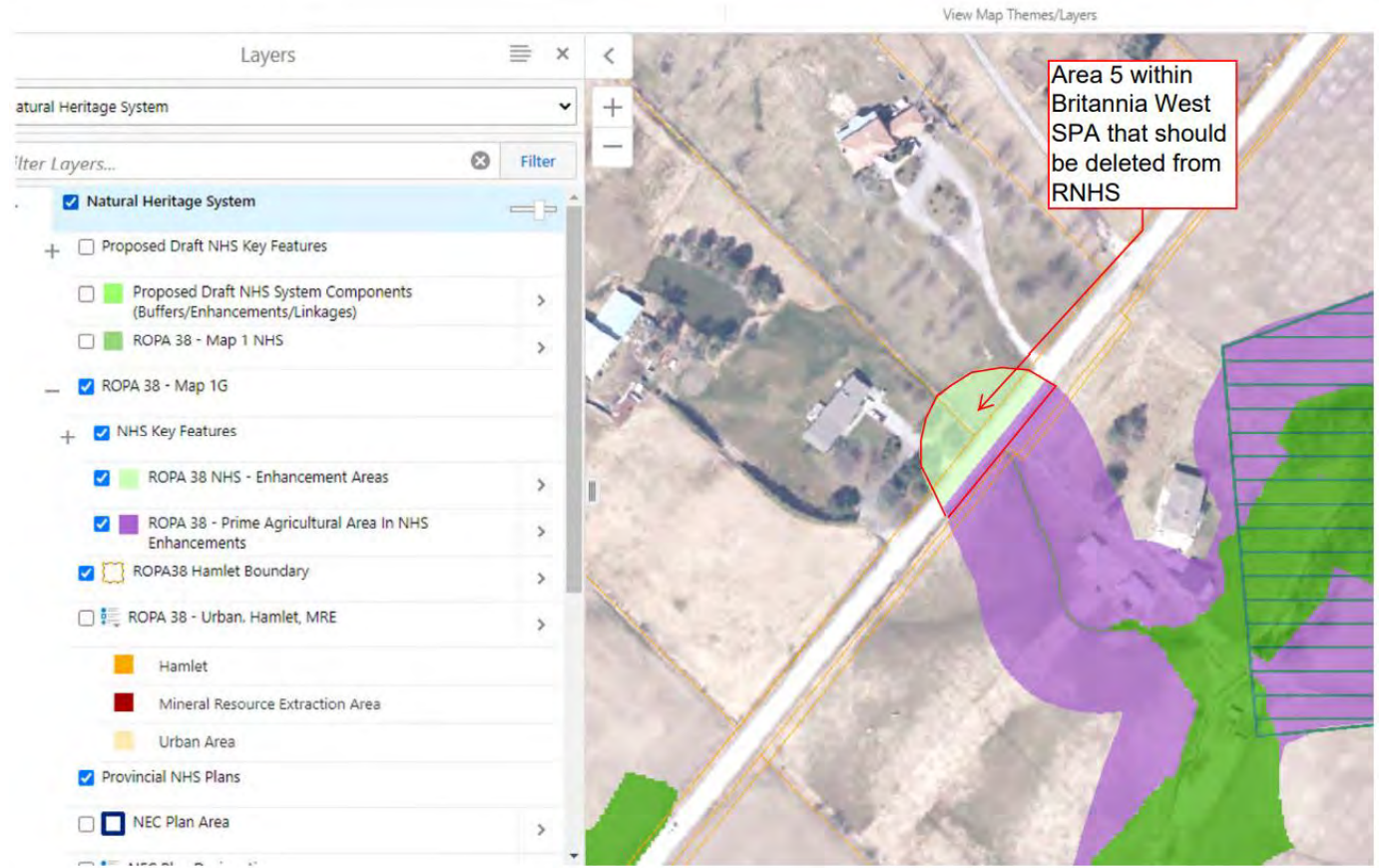
ATTACHMENT C
Recommended Changes to Draft 2019 RNHS Mapping
Milton Phase 4 (West) Landowners Group

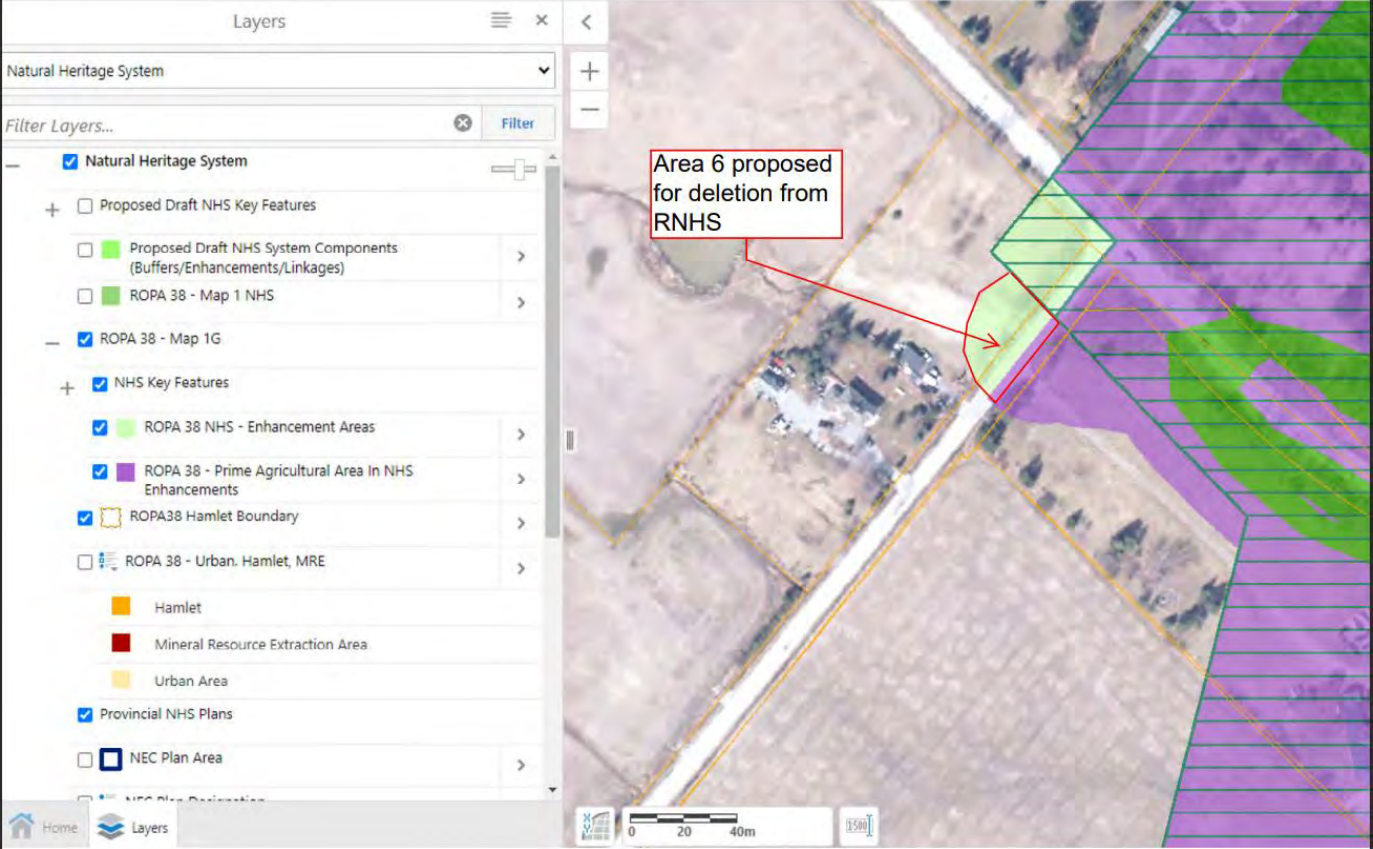
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		Area (See Figure 1)	Property Identifier	Participating Landowner	Rationale for RNHS Change (References to Maps and Tables are from the Draft Final Phase 4 SWS Report, May 2020)	Comments are acknowledged. Please see above for a detailed response.
9	N58	N/A	<ul style="list-style-type: none"> Therefore, given that the SWS is more accurate than the current RNHS, and it shows that there is no Key Feature within 30 m of Area 7, a buffer would not extend into the Secondary Plan. it should be deleted from the RNHS. The area appears to have been mapped in the ROPA 38 NHS as a buffer to a Key Feature (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer), although there are no Key Features present in the area, as it is actively farmed. Map T3-1 does not depict any Key Features within the Britannia West Secondary Plan Area at this location. Table 2.4.11 indicates that there is a wetland located outside the SPA. However, the wetland location shown on Map F1 is approximately 66 m from the Secondary Plan Area boundary. The intervening area is active agricultural land. Map T2-2 identifies this area as a "Potential NHS Refinement Area" Given that near this location (the closest potential Key Feature is 66 m away), this RNHS area within the Secondary Plan boundary should be deleted 			
10	P62 P68 P194	12300 Brit Holdings Ltd. Branthaven (Spina) NBD Milton Developments Inc.	<ul style="list-style-type: none"> ROPA 38 NHS mapping depicts a Key Feature (ID BF47 from the SWS) surrounded by a buffer (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer). The area is part of an active industrial operation. Map T3-1 identifies this area for removal from the NHS (ref: ID BF47) Table 2.4.11 indicates that there are no Key Features at ID BF47 and recommends that this area be removed from the RNHS ROPA 38 RNHS mapping also includes a Key Feature surrounded by a buffer (ID BB02 from the SWS; see attached screen capture). ROPA 38 maps two Key Features in this area including a hedgerow and a settling pond that is part of the industrial operation. Map T3-1 identifies this area for removal from the NHS (ref: ID BB02) Table 2.4.12 indicates that the area at ID BB02 consists of a hedgerow and there are no Key Features present, so this area mapped as a buffer in ROPA 38 RNHS mapping should be deleted 			
11	P62	12300 Brit Holdings Ltd.	<ul style="list-style-type: none"> ROPA 38 NHS mapping depicts a Key Feature and associated buffer in this area (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer). ROPA 38 RNHS mapping appears to have mapped an anthropogenic industrial pond as a Key Feature The SWS does not depict this pond as a Key Feature and Map T3-1 identifies this area for removal from the NHS (ref: ID BF37) Table 2.4.11 confirms that there are no Key Features in the location of ID BF37 			
ATTACHMENT C Recommended Changes to Draft 2019 RNHS Mapping Milton Phase 4 (West) Landowners Group						

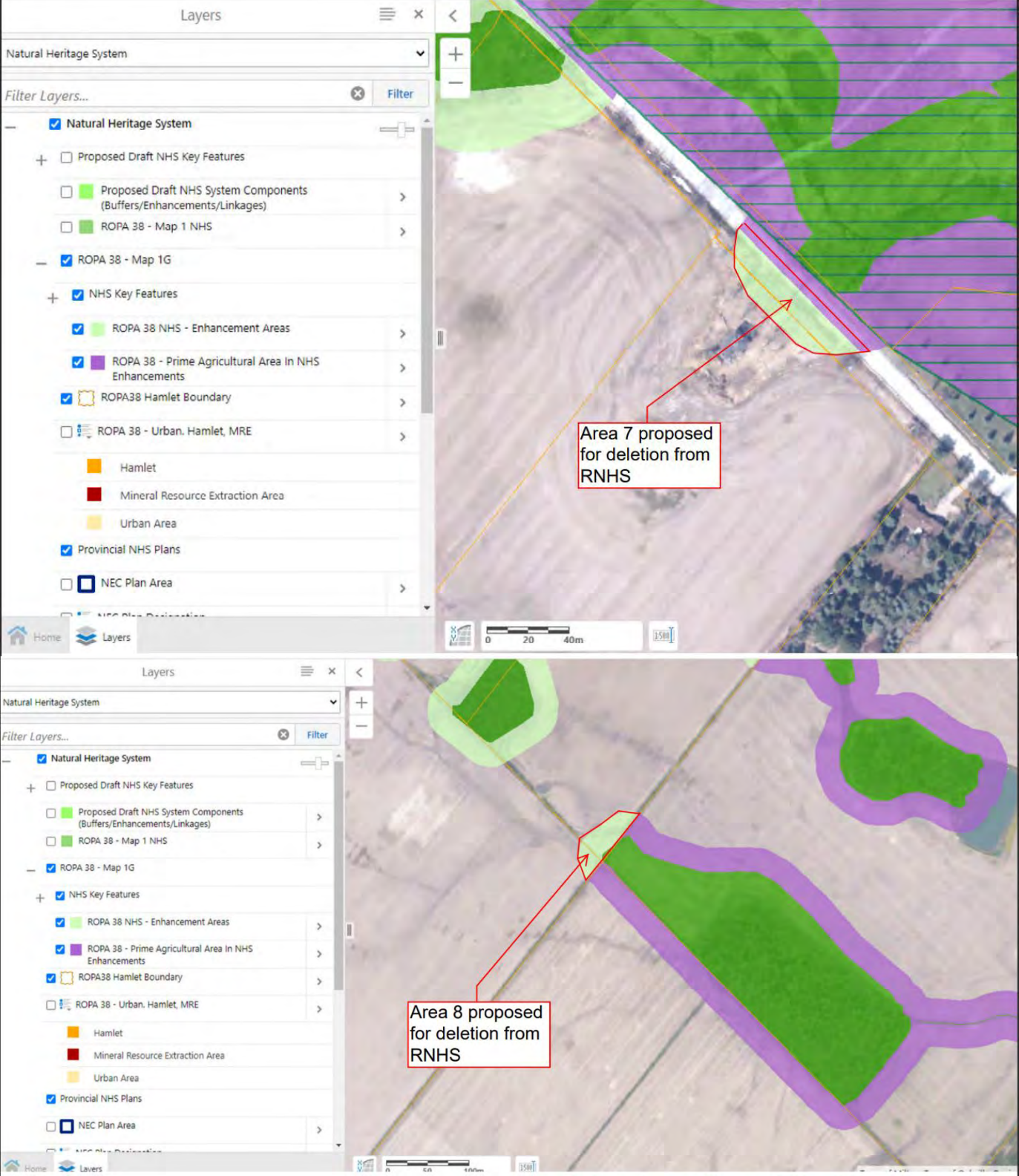
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12	P62	12300 Brit Holdings Ltd.	<ul style="list-style-type: none"> • ROPA 38 NHS mapping depicts a Key Feature and associated buffer in this area (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer). ROPA 38 RNHS mapping appears to have mapped a hedgerow as a Key Feature • Map T3-1 identifies this area for removal from the NHS (ref: ID BF21) • Table 2.4.11 confirms that there are no Key Features at this location as the area consists of a hedgerow, which is not a component of the RNHS. 			
13	P45 P29 N42/N43	Britannia Sixth Line Holdings Ltd. Fifth Line Farming Limited (Parcel 2) N/A	<ul style="list-style-type: none"> • ROPA 38 NHS mapping depicts a Key Feature and associated buffer in this area (see attached screen capture from the Region's Draft 2019 RNHS mapping viewer) • Map T3-1 identifies this area as a Group B wetland (ref: ID BF10), which is not proposed for removal from the RNHS in the SWS, although the management of this Group B wetland assessment will be determined at the MESP stage • Table 2.4.11 identifies this area (BF10) as a Group B wetland and candidate SWH for Terrestrial Crayfish. • Map T2-2 identifies this area as a "Potential NHS Refinement Area". • The boundary of this area mapped as part of the RNHS in ROPA 38 differs from the SWS. Since the SWS fieldwork/analyses are more accurate, the SWS boundary of this feature should be reflected on revised RNHS mapping and the 30 m buffer should be added from this updated feature boundary. 			
14	P29 P9	Fifth Line Farming Limited (Parcel 2) Neamsby Investments Inc.	<ul style="list-style-type: none"> • Map T3-1 identifies this location as "Areas to remove from the RNHS", based on the Ontario Municipal Board Minutes of Settlement (PL091166/PL111358/PL110857) dated September 27, 2013 • Consistent with the Minutes of Settlement the highlighted areas should be removed from the RNHS 			
15	P9 N73	Neamsby Investments Inc. N/A	<ul style="list-style-type: none"> • This area consists of a headwater drainage feature (reach TMSMC(3)1-2) that has been identified for Mitigation in Table 2.4.10. Mitigation HDFs are not considered to be part of the RNHS. • Map T3-1 does not depict any Key Features or other component of the RNHS in this area • Map T2-2 identifies this area as a "Potential NHS Refinement Area" • Given that there are no Key Features or other components of the RNHS present in this area, it should be deleted from the RNHS. 			
ATTACHMENT C Recommended Changes to Draft 2019 RNHS Mapping Milton Phase 4 (West) Landowners Group						4

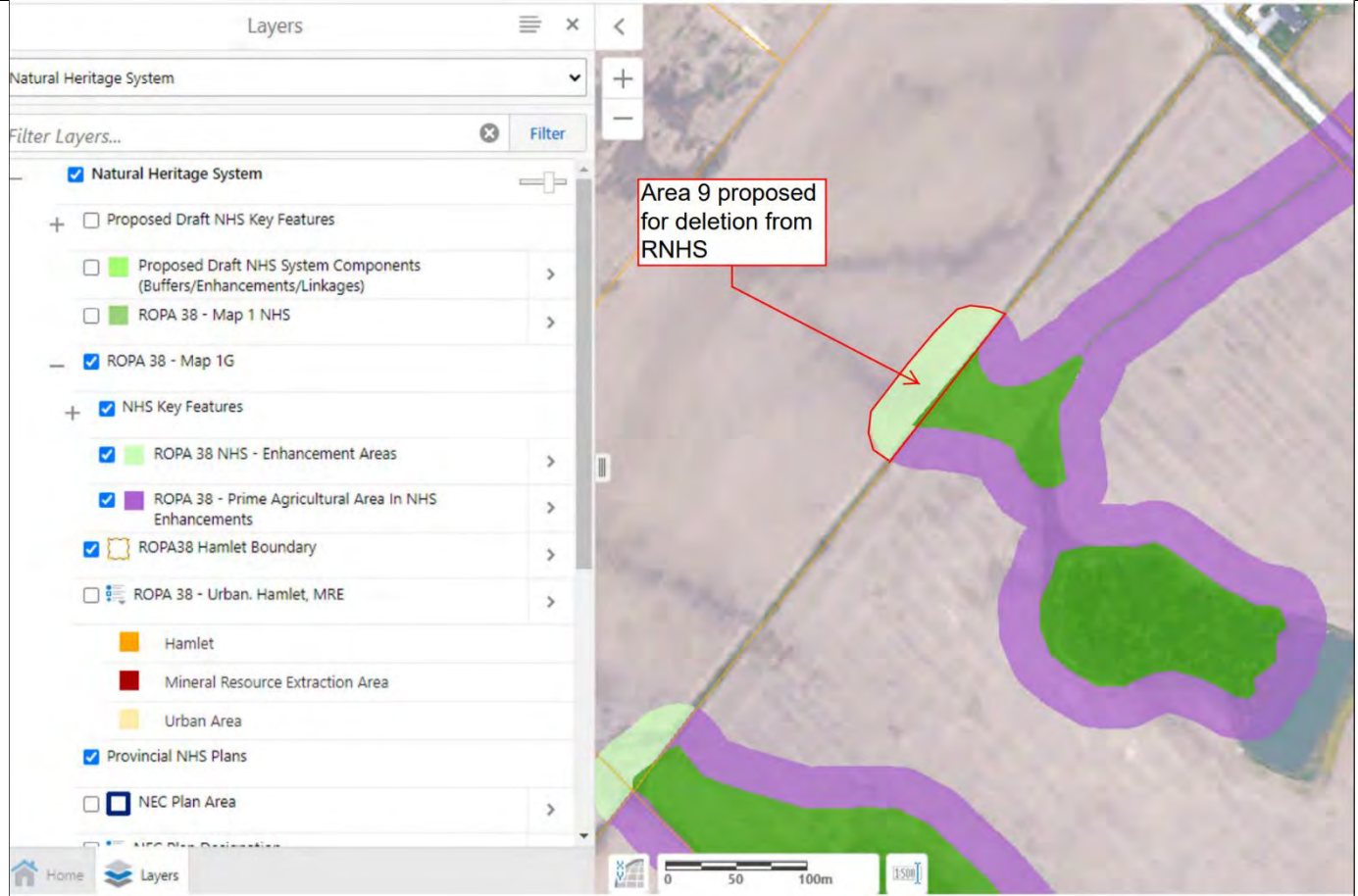
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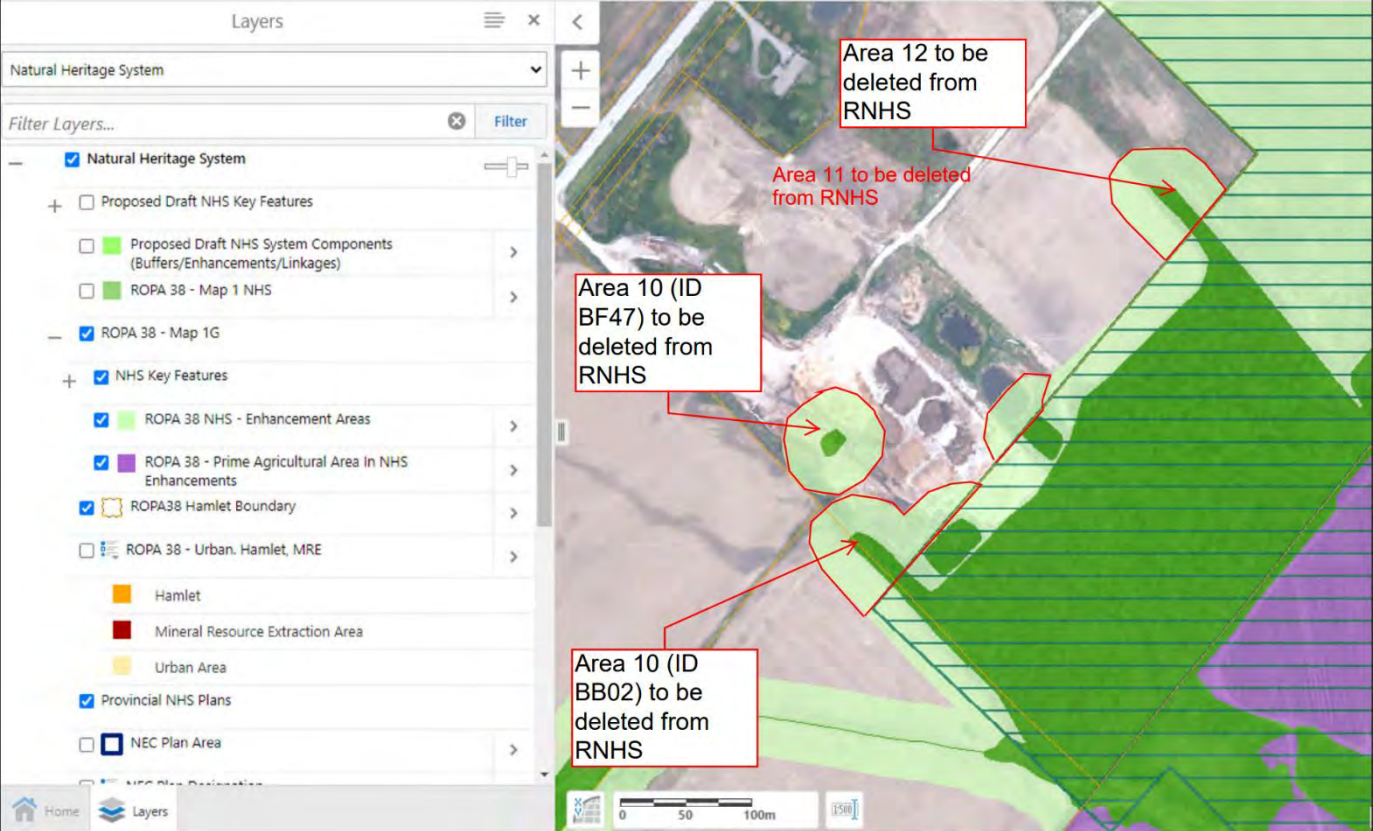
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		 <p data-bbox="1678 262 1926 312">Milton Phase 4 Growth Area - Britannia West Secondary Plan Area</p> <p data-bbox="1662 604 1880 725"> Britannia West Secondary Plan Area Participating Ownership Proposed RNHS Deletion Greenbelt Plan NHS Existing RNHS (ROPA 38) Key Features Enhancement Areas, Linkages and Buffers </p> <p data-bbox="1662 856 1942 957">Figure 1 Proposed RNHS Refinements – Britannia West Secondary Plan Area</p> <p data-bbox="1662 977 1942 997">Air photo: First Base Solutions, 2020. Imagery taken in 2019.</p> <p data-bbox="1662 1018 1942 1058">0 500 M SAVANTA A GEI Company</p> <p data-bbox="1367 1058 1942 1078">Document Path: C:\Savanta\116 - Britannia West\fig1.mxd;2020 10:07 mha removals\116_fig1_proposed_rnhs_refinements_britannia 2.mxd Date Saved: October 26, 2020</p>	<p data-bbox="1982 278 2766 342">Comments are acknowledged. Please see above for a detailed response.</p>


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			<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>The screenshot shows a GIS application window with a 'Layers' panel on the left and a map on the right. The 'Layers' panel includes the following items:</p> <ul style="list-style-type: none"> Natural Heritage System (expanded) Filter Layers... (with a 'Filter' button) <input checked="" type="checkbox"/> Natural Heritage System <input type="checkbox"/> Proposed Draft NHS Key Features <input type="checkbox"/> Proposed Draft NHS System Components (Buffers/Enhancements/Linkages) <input type="checkbox"/> ROPA 38 - Map 1 NHS <input checked="" type="checkbox"/> ROPA 38 - Map 1G <input checked="" type="checkbox"/> NHS Key Features <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ROPA 38 NHS - Enhancement Areas <input checked="" type="checkbox"/> ROPA 38 - Prime Agricultural Area In NHS Enhancements <input checked="" type="checkbox"/> ROPA38 Hamlet Boundary <input type="checkbox"/> ROPA 38 - Urban. Hamlet, MRE <input type="checkbox"/> Hamlet <input type="checkbox"/> Mineral Resource Extraction Area <input type="checkbox"/> Urban Area <input checked="" type="checkbox"/> Provincial NHS Plans <input type="checkbox"/> NEC Plan Area <input type="checkbox"/> NEC Plan Designation <p>The map on the right shows an aerial view with several colored overlays. A red box with an arrow points to a green-shaded area, labeled 'Area 6 proposed for deletion from RNHS'. Other areas are shaded in purple and yellow. A scale bar at the bottom indicates 0, 20, and 40 meters.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>The image contains two screenshots of a GIS application. Both screenshots show a 'Layers' panel on the left side of the map. The layers are organized as follows:</p> <ul style="list-style-type: none"> Natural Heritage System <ul style="list-style-type: none"> Proposed Draft NHS Key Features (unchecked) Proposed Draft NHS System Components (Buffers/Enhancements/Linkages) (unchecked) ROPA 38 - Map 1 NHS (unchecked) ROPA 38 - Map 1G (checked) NHS Key Features (checked) <ul style="list-style-type: none"> ROPA 38 NHS - Enhancement Areas (checked) ROPA 38 - Prime Agricultural Area In NHS Enhancements (checked) ROPA38 Hamlet Boundary (checked) ROPA 38 - Urban, Hamlet, MRE (unchecked) Hamlet (unchecked) Mineral Resource Extraction Area (unchecked) Urban Area (unchecked) Provincial NHS Plans (checked) NEC Plan Area (unchecked) <p>The top screenshot shows a map with a red box highlighting a small area labeled 'Area 7 proposed for deletion from RNHS'. The bottom screenshot shows a map with a red box highlighting a larger area labeled 'Area 8 proposed for deletion from RNHS'. Both screenshots include a scale bar at the bottom of the map area.</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>

No.	Source	Submission	Response
		 <p>The screenshot displays a GIS interface with a 'Layers' panel on the left. The 'Natural Heritage System' layer is active. The map shows several green-shaded areas representing NHS components. Three specific areas are circled in red and labeled with callouts: 'Area 12 to be deleted from RNHS' (top right), 'Area 11 to be deleted from RNHS' (center), and 'Area 10 (ID BF47) to be deleted from RNHS' (middle left). Another callout points to 'Area 10 (ID BB02) to be deleted from RNHS' (bottom left). The 'Layers' panel includes options for 'Proposed Draft NHS Key Features', 'Proposed Draft NHS System Components', 'ROPA 38 - Map 1 NHS', 'ROPA 38 - Map 1G', 'NHS Key Features', 'ROPA 38 NHS - Enhancement Areas', 'ROPA 38 - Prime Agricultural Area In NHS Enhancements', 'ROPA38 Hamlet Boundary', 'ROPA 38 - Urban, Hamlet, MRE', 'Hamlet', 'Mineral Resource Extraction Area', 'Urban Area', 'Provincial NHS Plans', and 'NEC Plan Area'. A scale bar at the bottom indicates 0, 50, and 100 meters.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p>The image contains two screenshots of a GIS application. Both screenshots show a 'Layers' panel on the left side of the interface. The top screenshot shows a map with a green area and a red outline, with a callout box stating 'Approximate feature boundary from Draft Final Phase 4 SWS'. The bottom screenshot shows a similar map with a red outline and a callout box stating 'Area 20 proposed for deletion from RNHS'. Both screenshots include a 'Layers' panel on the left with various map layers checked or unchecked.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
42.	North Oakville Community Builders Inc	<p>Attached per email dated 2020-10-30</p> <p>Dear Chair Carr and Members of Council</p> <p>Re: Regional Official Plan Review Discussion Papers - NOCBI</p> <p>I am writing to you on behalf of the North Oakville Community Builders Inc. (NOCBI). The members of NOCBI are set out on the list attached to this letter. The following is their response to the Discussion Papers issued for the Region of Halton IGMS process.</p> <p>Comments were previously provided by NOCBI on June 17, 2019, December 12, 2019 and March 24, 2020, on the Progress Update Report and the Integrated Growth Management Strategy Growth Scenarios: Halton Region to 2041. For completeness of the record, we have attached copies of those comments to this letter as the issues and concerns raised in those submissions have not been responded to by the Region to date or addressed within the Discussion Papers.</p> <p>Natural Heritage Discussion Paper</p> <p>Attached is a copy of the September 8, 2020 submission, prepared by Davies and Howe, the solicitors for NOCBI, to the Mayor and Council of the Town of Oakville on the Regional Natural Heritage System Discussion Paper, the North Oakville East Secondary Plan and specifically the Town of Oakville Staff Report on these matters. In that letter it is noted that: the Regional Official Plan currently contains specific language regarding the North Oakville Secondary Plan Area and the Regional Natural Heritage System; there is agreement with the comments from Town staff and the concern that the Region is considering a policy change in the Natural Heritage System requirements for the North Oakville Plan area.</p> <p>NOCBI is concerned that nowhere in the Natural Heritage System Discussion Paper does the Region commit to carrying forward a provision the same as or similar to Section 116.2 in the Regional Official Plan. The North Oakville East Secondary Plan, OPA 272 was intended to be implemented over many years as reflected in Minutes of Settlement between the Town and the North Oakville East landowners with a 30 year time from for implementation. It is NOCBI's request that the Region maintain Section 116.2 in the new ROP and that the scope of any amendments to the ROP for North Oakville be limited to those only absolutely necessary to implement a provincially mandated policy change.</p> <p>The Natural Heritage Discussion Paper sets forth a number of questions for the Region as a whole. A response to these questions has been assembled by NOCBI's consulting team and this response is attached. In addition, the consulting team has undertaken a review of the revised RNHS mapping. There are a number of issues with the proposed mapping set out below and attached.</p> <p>As part of the Region of Halton Official Plan Review (ROPR), Regional staff prepared draft revised Regional Natural Heritage System (RNHS) mapping that they intend to include in their updated Official Plan. According to the Region's Natural Heritage Discussion Paper (June 2020) and supporting technical memos, they are revising the mapping to recognize planning decisions and updated information since ROPA 38 came into effect in 2009. The draft 2019 RNHS mapping was prepared by the Region and circulated for comment along with the ROPR Discussion Papers. The Region notes that a baseline date of June 2018 was used for the preparation of their 2019 RNHS mapping however, we understand that additional changes will be made to the revised mapping prior to formal adoption of the new OP to include planning approvals up to the ROP approval date.</p>	<p>Regional staff have reviewed your submission regarding the draft proposed NHS mapping, including your recommendation for refinements to the mapping to reflect the NHS boundaries illustrated in the appendices of the submission and subsequently providing the digital ERSI shapefile. 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. Regional staff are currently reviewing the mapping submission and engage with the landowners and their consultants as part of this process. 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.</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> <p>Regional Urban Structure Discussion Paper</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
		<p>The draft 2019 RNHS mapping includes some changes to their current (2009) RNHS mapping on the North Oakville East lands. Stonybrook Consulting Inc., and Stantec Consulting Inc. reviewed the Region's draft 2019 RNHS mapping and compared it to NHS boundaries that have been incorporated into approved Draft Plans of Subdivision and/or from approved Environmental Implementation Report/Functional Servicing Plans (EIR/FSS). This comparison identifies several areas where the Region's 2019 RNHS should be modified to reflect approvals to date. A set of six drawings are attached that present the following:</p> <ul style="list-style-type: none"> a) the Region's 2019 RNHS; b) consolidation of NOCBI Owners' draft plans of subdivision or development concepts that include NHS boundaries on approved or registered draft plans, from approved EIR/FSSs or approved feature staking with agencies. NHS boundaries (red and blue linework), are based on features staking plus buffers consistent with requirements of the Town of Oakville Official Plan Amendment 272 (OPA 272); c) areas recommended for removal or addition to the 2019 RNHS; d) areas where SWM ponds are permitted in the NHS, consistent with OPA 272 and/or OMB Minutes of Settlement; and, e) annotations regarding the basis for NHS approvals (approved draft plan, approved EIR/FSS or approved feature stakings with agencies). <p>Based on our review, changes to the RNHS mapping include minor deviations from the 2019 RNHS mapping (both additions and deletions) and several more substantive changes based on channel realignments, core boundary delineations, and removal of optional linkage preserve areas. We request that the RNHS be updated to reflect the NHS boundaries shown on the attached drawings. Digital drawing files will be provided to the Region to facilitate these changes.</p> <p>Regional Urban Structure Discussion Paper</p> <p>As noted in our previous submissions, any preferred growth scenario must be based upon the current and in effect Places to Grow Plan and land needs methodology. The new Growth Plan extends the Planning Horizon to 2051 with updated population and employment projections. There is an updated market based land needs methodology. Continuing to base the next steps of the IGMS process on a previous Growth Plan which no longer has legal status as the basis for planning growth for the future is not appropriate.</p> <p>The PPS specifically refers to the provision of a market-based range and mix of housing. Market based range and mix of housing is required to be considered as part of the IGMS process. The Urban Structure set out within the Discussion paper is premised on empty nesters moving from their homes to apartments and young families will chose to move to apartments instead of ground related housing. This does not reflect the reality of a market-based range and mix of housing. Equally, it will not result in more affordable housing in the Region as set out in the attached letter. A realistic, defensible, implementable plan for growth is needed for Halton.</p> <p>Attached to this letter is the analysis of the Urban Structure Discussion Paper by urban Metrics Inc dated September 17, 2020. This letter sets out detailed responses to a number of questions posed within the Urban Structure Report. In summary, these responses state:</p> <ul style="list-style-type: none"> • Density targets along Trafalgar Road and Dundas Street should only be established after an understanding of a) how they will impact the ability of higher order intensification areas to achieve 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>their targeted densities b) whether there is sufficient market to support additional density along the corridors c) how additional density will work in the context of the in effect Secondary Plan and existing land use commitments, and d) consideration of the allocation of growth to unplanned growth areas such as the Palermo node and the Research Innovation Lands.</p> <ul style="list-style-type: none"> • Identification of additional multi-purpose and minor arterial roads to support a higher order Regional transit network raise the question as to whether the market exists to accommodate increased densities along these roads without detracting from higher priority intensification areas and whether these roads can physically accommodate this increased density without impacting existing and planned low density neighbourhoods. • Regarding factors to be considered when evaluating the appropriate location for potential settlement expansions, it is noted that the criteria set out within the report omit any aspect of market consideration as required by the Places to Grow Plan and the PPS. The criteria set out by the Region are focused only on desired policy outcomes and not whether the growth strategy could be supported by market trends nor includes consideration of potential adverse impacts on the regional economy, consumer housing decisions and housing affordability. There is very little discussion within the Paper regarding the economic impact of market manipulation and the need to plan for complete communities that appropriately balance all housing types and avoid the over designation of lands for apartment development. Apartment built form may be a more affordable option for singles and couples but is a less affordable option for families which require more living space. Other key questions are raised by the potential over designation of lands for apartment development such as the viability of the Region of Halton allocation program development if the markets for apartments does not materialize. • Regarding the minimum density in the designated greenfield area, it is noted that North Oakville already exceeds the density of 50 residents and jobs per hectare set out within the Places to Grow Plan and will likely exceed 60 residents and jobs per hectare when completed. Any considerations to exceed the Provincial requirements would be for local reasons and not to achieve Provincial targets. • With the new Growth Plan, the Region should reconsider the Scenarios it originally proposed in its options report as they no longer reflect the new policy context and revised population and employment forecasts. As part of the next step in the process, the Region use the new market based methodology to determine its land needs and allocating future development to its area municipalities. <p>Regarding how the Regional Official Plan support employment growth and economic activity, the Official Plan needs to recognize the significant changes that are occurring in the commercial sector stemming from the rapid rise in e-commerce and impacts of changing behaviours due Covid-19 resulting in fundamental changes to the commercial hierarchy and the interrelationship between employment and commercial function. The Regional Official Plan should provide flexibility with the Official Plan to allow businesses to respond in this changing environment.</p> <p>NOCBI looks forward to working with the Region throughout this study process. Should you have any questions or wish to discuss this submission further, please do not hesitate to contact me.</p> <p>Regards,</p> <p>Ruth Victor MCIP, RPP, MRTPI</p> <p>See attached below</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>This submission was accompanied by an attachment which can be found in Part 7. The attachment includes detailed comments on the discussion paper questionnaires and supporting technical analysis.</i></p>	
43.	Southwest Georgetown Landowners Group	<p>Attached per email dated 2020-10-30</p> <p>Dear Sir:</p> <p>Re: Regional Official Plan Review Discussion Papers Southwest Georgetown Landowners Group Comments</p> <p>Macaulay Shiomi Howson Ltd. (MSH) is the planning consultant for the Southwest Georgetown Landowners Group Inc. (SWGLG). We have been asked to provide comments on behalf of SWGLG on the Discussion Papers issued by the Region as part of the Regional Official Plan Review. The following submission provides some background with respect to the SWGLG to establish a context for this submission, followed by our comments on key issues relevant to the SWGLG in the Natural Heritage, Climate Change, Rural and Agricultural and Integrated Growth Management Strategy Regional Urban Structure Discussion Papers. This response has been prepared after review of the comments provided by the Town of Halton Hills and reflects support for those comments where applicable.</p> <p>1. <u>SWGLG Background</u></p> <p>The SWGLG is an incorporated corporation comprised of the following individual landowners: Georgetown Country Properties Ltd., Lormel Developments (Georgetown) Ltd., Lormel Developments (Eighth Line) Ltd., Ozner Corporation, Neamsby Investments Inc., Shelson Properties Ltd., Coryville Construction Ltd. and Mattamy (Halton Hills) Limited.</p> <p>Collectively the landowners own approximately 356 hectares of land in the south-west area of the Georgetown Urban Area. This block of land is generally bounded by 15th Sideroad to the north, Main Street and 8th Line to the east, 10th Sideroad to the south and Trafalgar Road to the west. These lands, and approximately 52 hectares of additional land owned by other landowners, are referred to by the Town of Halton Hills and the Region of Halton as the "Vision Georgetown Secondary Plan area". The Town's Secondary Plan for Vision Georgetown was approved by the Region of Halton in September 2020 and has been appealed by the SWGLG.</p> <p>2. <u>Natural Heritage Discussion Paper</u></p> <p>Dillon Consulting Limited (Dillon), who provide environmental consulting services to SWGLG, have carried out a review of the Natural Heritage Discussion Paper and the Draft 2019 Natural Heritage System and other supporting information. Their detailed comments are found in Appendix A to this submission.</p> <p>The following summarizes the major concerns with the directions identified in the Natural Heritage Discussion Paper which reflects the input from Dillon.</p> <p>2.1 Regional Natural Heritage System General Approach</p> <p>The key general concern, based on our review, is that the proposed policy directions are premised on a more rigid approach than the current Official Plan. An approach which does not recognize the fact that there is insufficient, current information available at the Regional-scale to make final decisions on</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> <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>

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		<p>boundaries, features and buffers. In our opinion, as a result, such decisions must be made through a science-based case-by-case analysis. The Regional Plan should establish a general framework for such decisions while recognizing that additional current data is required to make final determinations and that changes have and can occur over time</p> <p>We concur with the comments from the Town of Halton Hills that the ultimate Regional Natural Heritage System should be:</p> <p>“.....sustainable, based on ground-truthing and completed environmental studies and research. Policy discussion should also consider opportunities to restore natural areas as a means of expanding the RNHS. Lastly, 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>In this context, we are also concerned that the Natural Heritage Discussion Paper includes discussion on an option to enshrine a new precautionary principle in policy. This is summarized as “when faced with uncertainty, erring on the side of being conservative to ensure protection of natural heritage components”. 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>However, in our opinion, adding specific reference to a precautionary principle in policy would provide a basis for a strict interpretation of the Regional Official Plan Natural Heritage System policies and mapping. This is not appropriate given the concerns with the information on which the policies and mapping are based. There is no justification for the use of the precautionary principle. Rather as noted above a policy framework needs to be established which ensures that decisions are made through a science-based, case-by-case analysis.</p> <p>2.2 Distinction between Linkages, Buffers and Enhancement Areas in the Draft 2019 NHS</p> <p><i>The basis for the development of the Draft 2019 NHS is not clear or transparent with the various components having been consolidated into one layer on the maps in the Discussion Paper. As noted in the Dillon comments:</i></p> <p>“the implementation framework for the Sustainable Halton NHS was based on distinguishing identifiable components that make up the NHS. The consolidation of these components into one layer makes applying various levels of flexibility or other applicable policies of the ROP within this layer impossible, as this was not the intent of the implementation framework.</p> <p>In addition, Dillon notes that:</p> <p>“Section 4.5 of the Discussion Paper notes that “An analysis was completed to refine the components of the NHS including buffers, enhancement areas and linkages.....”. Given the consolidation of these features, it is unclear how this analysis was conducted..... For transparency purposes, and in order to apply policies or development criteria to these areas, distinction between these three components would be required.....We recommend that revised mapping be updated to match this conceptual figure to allow</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>Rural and Agriculture</p> <p>The mapping approach supported by SWGLG aligns with Policy Direction RAS-1. RAS-1 (also see NH-6) recommends the designation of prime agricultural areas, rural lands, and key features with the remaining NHS as an overlay. This mapping approach is reflective of Mapping Option 2 in the Discussion Paper and is recommended by staff as it strikes a balance in the preservation of agriculture and protection of the environment.</p> <p>Regional staff acknowledges the preference for maintaining the current policy framework for Agricultural Impact Assessments. 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. It 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.</p> <p>Suggestions to include parkland and other similar land intensive uses in the Rural Agricultural System will need to be reviewed and have the opportunity to be considered and explored through the policy formulation stage of the ROPR. Acknowledged receipt of comments regarding parkland.</p> <p>Natural Heritage</p> <p>Thank you for your representatives’ collective and thorough comments with regards to 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. More fulsome details are available in the Policy Directions Report. Policy directions to address comments received include, but are not limited, to the following:</p>

No.	Source	Submission	Response
		<p>practitioners to apply relevant policies and scope environmental studies accordingly. Alternatively, this consolidated layer should function as an area of flexibility to apply linkage, enhancement or buffer options on a site-specific basis, with no specific restrictions, or policy requirements.”</p> <p>2.3 Centres for Biodiversity/Environmentally Significant Areas</p> <p><i>Dillon has identified the need for “further refinement within Enhancement Areas of the draft NHS.” In particular, Centres for Biodiversity need to be specifically delineated from other Enhancement Areas since these components are not specifically defined in the 2019 ROP.</i></p> <p>The basis for the areas mapped is not clear or transparent, as Dillon notes:</p> <p>“....it cannot be determined what habitats are proposed, or which species are intended to benefit from the enhancement activities. To remedy this in the revised Regional NHS, it is proposed that the identification of the Centres for Biodiversity be conducted as a result of environmental field studies and identification of candidate and confirmed Significant Wildlife Habitat (SWH), and habitat for Species at Risk (SAR). This recommendation is in line with those proposed in Section 3.3 of the Sustainable Halton Report 3.02, which notes that substantial flexibility should be allotted for the adjustment of these areas should principles of conservation biology be applied.”</p> <p>Dillon also identifies the need for updated NHS mapping and policies to identify Environmental Significant Areas and provide direction for the protection of such features.</p> <p>2.4 Buffers/Vegetative Protection Zones(VPZs)</p> <p><i>The current approach to the Regional Natural Heritage System and the establishment of features and buffers has generally appeared to serve all stakeholders and should be maintained. The policy framework provides clear direction, but allows flexibility to carry out detailed studies as part of development applications.</i> The comments from the Town of Halton Hills, with which we concur, appropriately reflect this direction with respect to buffers when they:</p> <p>“support the current case-by-case analysis approach to applying buffers. Moving forward, policies should apply a science-based approach and consider the sensitivity of the key features being impacted. Lastly, any new or expanded policies on buffers should support a contextspecific approach that supports the development of complete communities in Halton.”</p> <p>However, as noted in Dillon’s comments, this is not what is proposed:</p> <p>“a 30 m buffer/VPZ is currently recommended to protect Key Features of the Regional NHS, as well as Core Features identified on provincial mapping. this setback does not, however take into consideration the current existing conditions or the proposed land use to occur within adjacent lands. As identified in the Sustainable Halton Report 3.02, 2014 and 2020 (draft) Regional Environmental Impact Assessment Guidelines, Conservation Halton Environmental Impact Assessment Guidelines, and the 2020 Best Practices Review Technical Memo, the precise boundary of the Regional NHS and the determination of buffer/VPZ widths are to be determined through the completion of environmental studies. Its recommended that further refinement of the protective buffers be determined using results of site-specific environmental studies, as well as through consultation with the Region, local municipalities, and conservation authorities.”</p>	<p>Natural Heritage (NH) Policy Direction 1, speaks to incorporating new mapping and policies in the ROP that implement the new NHS for the Growth Plan. NH Policy Direction 3 proposes to harmonize the mapping and policies for the Greenbelt NHS and the Growth Plan NHS to create the Provincial NHS. NH Policy Direction 4 – incorporates new policies and mapping in the ROP that implements a Water Resource System. NH Policy Direction 5 updates and enhances existing policies in the ROP on Natural Hazards to be consistent with and conform to the Provincial Policies and Plans. NH Policy Direction 6 updates the ROP mapping to include an NHS overlay within Key Features designated in rural areas and maintain the NHS designation in Settlement Areas. NH Policy Direction 7 updates the policies and mapping that will build on the existing comprehensive RNHS policy framework. NH Policy Direction 8 – is to update the Regional Plan to address the quality of a woodland in the determination of the significance of woodlands.</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 an area-specific plan, development, or site alteration application in accordance with Policy 116.1 of the ROP.</p>

No.	Source	Submission	Response
		<p>2.5 Significant Woodlands</p> <p><i>We concur with both Dillon and the Town of Halton Hills that a more comprehensive approach is required to the protection of significant woodlands.</i> In addition to the size criteria currently provided in Section 227 of the Regional Official Plan, qualitative data should be considered and the features should be assessed on a site-by-site basis. For instance, as noted by Dillon, woodlands containing ELC polygons consisting of predominantly invasive species (e.g. black locust) should not be considered significant. Further, woodlands containing ELC polygons consisting of mostly dead trees infested with disease should rely on additional wildlife and environmental studies in order to identify biological value. Further, as noted by the Town:</p> <p>“The Region should also consider studies completed locally as part of Secondary Plans and other projects when identifying these woodlands.”</p> <p>2.6 Water Resource System</p> <p>As identified in Section 6 of the Discussion Paper, changes to Provincial policies establish the need to identify a water resource system. However, this system is clearly different from, although it overlaps with, the Natural Heritage System. In fact, the Province has mapped the Natural Heritage System for the Growth Plan (Growth Plan Section 4.2.2.1), while the water resource system is to be identified through watershed planning or equivalent, or in the case of designated greenfield areas through a subwatershed plan or equivalent.</p> <p>Option 2 identified in the Discussion Paper which proposes to separate the two systems would be preferred. This will clarify, as noted by Dillon in their submission, that different policies govern 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><i>In establishing the water resources system, it is not clear that it is necessary to map the system at the Regional scale, given that it is to be identified based on watershed planning. However, similar to the Natural Heritage System, if the system is mapped, the Regional Plan should establish only a general framework while the policies provide that any final determination is based on detailed studies carried out as part of development applications.</i></p> <p><i>In addition, in considering the components of the water resources system, clarity in interpretation of terminology based on detailed consideration of Provincial policy including definitions is necessary.</i> Some of the wording used, and conclusions reached, in the Mapping Audit Technical Memo, if translated into policy, may result in interpretation issues. For instance, “aquifers and unsaturated zones” do not all meet the definition of groundwater features “which are necessary to for the ecological and hydrological integrity of the watershed”, rather the key hydrologic areas definition is much more narrow (i.e. highly vulnerable aquifers). Similarly, headwaters and headwaters catchments do not include headwater drainage features. Further, floodplains are natural hazards which are addressed through a separate policy framework and should not be considered as part of the water resources system.</p> <p>2.7 Mapping</p> <p><i>If the current policy approach to the Natural Heritage System and to the water resource system, which provides general direction, but allows flexibility to carry out detailed studies as part of development</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>applications to guide any future decisions, is not maintained, then there are serious concerns about the mapping proposed for the updated Official Plan, including any mapping of the water resources system. The mapping is already outdated and it is recommended that the Region undertake to update the current mapping and to maintain it consistently and regularly (yearly). The mapping should be updated to reflect the results of the most recent work undertaken in the Region. This would include detailed work undertaken for Secondary Plans such as Vision Georgetown, block plans and plans of subdivision.</i></p> <p>With respect to other mapping issues, unfortunately, the introduction of the Growth Plan Natural Heritage System mapping and policies adds another layer of complexity to an already complex Natural Heritage System policy framework. There does not seem to be a good solution, however, Option 2 (Harmonize the Provincial NHSs) in the Discussion Paper is preferred for incorporating the Growth Plan Natural Heritage System into the Regional Plan. This would allow flexibility, as noted in the Discussion Paper, to include policies that reflect local considerations for the Regional Natural Heritage System, rather than allowing the more restrictive policies to apply.</p> <p>With respect to the relationship between natural heritage protection and agriculture, Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage Overlay) appears the most appropriate. Under this approach, as noted by Town of Halton Hills staff:</p> <p>“This option would maintain the current RNHS while providing more flexibility for other planning interests in the rural areas of the Region.”</p> <p>Further as noted by Dillon, “under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features”) interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and identifying Key Features.”</p> <p>Dillon notes further, in keeping with the discussion in Section 2.2 of this submission that “separate layers for Linkages, Buffers and Enhancement Areas be provided in revised ROP mapping to assist with identification and application of relevant policies.” This also reflects a more transparent approach.</p> <p>2.8 Natural Hazards</p> <p>The Discussion Paper suggests three options for the mapping of Natural Hazards. With respect to areas subject to flooding, given that floodplain mapping is not available for all areas of the Region, and that the level of detail of such mapping varies, Option 2 which would show floodplain mapping as an overlay is preferred. Such mapping should make it clear that the mapping is for floodplain areas only. In addition, the policy framework should permit modifications without an amendment to the ROP based on updated or more detailed site-specific studies.</p> <p>With respect to erosion hazard mapping, this is not typically mapped until site-specific analysis is carried out. As such, the policies should make it clear that erosion hazards are to be identified during area-specific and/or site-specific studies.</p> <p>3. <u>Climate Change Discussion Paper</u></p> <p>The directions in the Climate Change Discussion Paper are very general. The Paper seeks to examine opportunities “to address climate change through land use policies in the Halton ROP”. However, at the same time the Paper recognizes that:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>“through its sustainable land use approach, the current ROP policies implicitly respond to climate change risks and threats. They do so by directing growth to complete communities and away from natural heritage and agricultural lands.”</p> <p>The Discussion Paper suggests building on that current approach “by integrating a climate change lens to explicitly and meaningfully address climate change by targeting the most impactful policy areas within the ROP from a GHG emission reduction standpoint.”</p> <p>No specific policy directions are provided for review. However, the general indication is that the approach will be one which allows the local municipalities to direct development in a manner which is context specific, avoiding a one size fits all framework as per the following:</p> <ul style="list-style-type: none"> • “a healthy variety of housing, especially higher density housing forms, where appropriate”; • “support opportunities to incorporate distributed energy resources and alternative energy systems in new developments”; and • “more explicit policies promoting compact building forms and nodes and corridors that maximize active transportation and the use of transit to align with the PPS, 2020.” <p><i>In principal this approach, rather than Regional policies that require specific solutions, appears appropriate. It will allow Halton Hills and the development community to continue to address this issue in a manner which reflects the specific nature and culture of the Town.</i></p> <p>4. <u>Rural and Agricultural Discussion Paper</u></p> <p>The Rural and Agricultural Discussion Paper examines a number of issues which primarily relate to rural areas. The following comments outline the major concerns with the directions identified in the Discussion Paper which can affect urban areas and future development.</p> <p>4.1 Mapping</p> <p>The current Regional Official Plan includes “Prime Agricultural” as a constraint on development in certain areas, but does not include a designation. However, the PPS 2020 and the Growth Plan, 2019 require municipal plans to designate Prime Agricultural Areas. The Discussion Paper identifies four options to address this issue. Consistent with our recommendation in Section 2.7 of this submission with respect to the Natural Heritage System, the following is recommended:</p> <p><i>“With respect to the relationship between natural heritage protection and agriculture, Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage Overlay) appears the most appropriate.....as noted by Dillon, “under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features”) interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and identifying Key Features.”</i></p> <p>4.2 Agricultural Impact Assessments</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>It is critical, as noted previously, that the Regional Official Plan allow the local municipalities to direct development in a manner which is context specific, avoiding a one size fits all framework. The current policy framework for Agricultural Impact Assessments provides that flexibility. At the same time, the existing policy framework has provided considerable protection for agricultural operations in the Region even when immediately adjacent to urban development in approved settlement areas. As a result, <i>it is recommended that the existing policy framework be maintained.</i></p> <p>4.3 Parkland and other similar land intensive uses in the Rural Agricultural System</p> <p><i>The comments from the Town of Halton Hills identify a need for “greater flexibility in rural agricultural policies to permit public park uses in the RAS.” This reflects comments from the Town’s Recreation and Parks department which identify “a notable deficit in parkland when only considering available land in urban areas.” This is an issue not just in Halton Hills, but throughout the Region of Halton and the Greater Golden Horseshoe and deserves careful review and consideration as part of the Regional Official Plan review. However, we would suggest that this review also consider other land intensive uses given the intense competition for limited urban land. This competition is exacerbated by pressures for the protection of an expanded Natural Heritage System, but also by constantly expanded land requirements for uses such as schools, places of worship, stormwater management facilities and community facilities, as well as parks. Consideration of the permitting some of these land extensive uses in rural areas subject to strict criteria should be evaluated.</i></p> <p>5. <u>Integrated Growth Management Strategy Regional Urban Structure Discussion Paper</u></p> <p>The Regional Urban Structure Discussion Paper examines specific aspects of the Regional Urban Structure as a basis for the development of Growth Concepts in the next stage of the Integrated Growth Management Strategy. The following comments outline the major concerns with the directions identified in the Discussion Paper.</p> <p>5.1 Amendment 1 A Place to Grow: Growth Plan for the Greater Golden Horseshoe</p> <p>The Regional Urban Structure Discussion Paper was released in June 2020. It does not reflect or acknowledge the requirements of Amendment 1 to the Growth Plan which was approved on August 28, 2020. These changes are fundamental including 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) as part of the conformity exercise to meet the conformity deadline of July 2022; 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. Further, the Discussion Paper does not appear to reflect the PPS 2020 which came in effect on May 1, 2020 including “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. <i>An addendum is required to the Discussion Paper to review the impact of these fundamental changes in Provincial policy and their implications with respect to the matters considered in this paper.</i> The development of any Growth Concepts is required to be based on the current Growth Plan and the related market-based land needs methodology and the implications of these changes must be clearly identified and the implications discussed.</p> <p>5.2 Increased development density in transit or potential transit corridors</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The Discussion Paper seeks input on two directions which would result in a requirement for increased development density in corridors which are now, or which could be, identified as Transit Priority Corridors:</p> <ul style="list-style-type: none"> • The definition of transit priority corridors as Strategic Growth Areas with a specific minimum density target; and, • The identification of additional multi-purpose and minor arterial roads in the Regional Urban Structure to support a higher order Regional transit network. <p>The corridors identified are extremely long, in some cases extending across major areas of the Region, with a variety of land use and different development contexts. Requiring high density development along the full extent of a corridor on principle without careful evaluation and understanding of the local context is at best premature and could very well result in inappropriate forms of development – isolated high density development without the necessary community services. In addition, minimum density targets for such extensive areas could impact on the ability of Strategic Growth Areas, and other areas where intensification is encouraged, to attract development and achieve planned densities.</p> <p><i>The Region policy framework should encourage development which supports transit along already identified transit priority corridors. However, such policies should not establish specific density targets, but should provide the flexibility for the local municipality to carry out detailed studies as part of secondary plans, area specific plans, or other special studies to determine how that direction is best implemented.</i></p> <p><i>With respect to the identification of additional multi-purpose and minor arterial routes in the Regional Urban Structure to support a higher order Regional transit network, such a direction is premature. A designation as a transit priority route requires careful background assessment to ensure that such corridors will, or can be developed, to appropriately support the Regional network. That work has not yet been done.</i></p> <p>5.3 Identification of additional nodes from a growth or mobility perspective</p> <p><i>Similar to the identification of additional corridors or the establishment of required densities in corridors, it is premature to identify additional development nodes and their related function and density without a detailed understanding of the local context. The local urban structure is best developed at the local level. The Regional Official Plan already provides the necessary policy direction for the local municipalities to do this including regarding intensification areas (i.e. Part III Section 81 (2), 81 (3) and 81(7)). Further direction, including overly prescriptive targets and densities is unnecessary. In particular, a greenfield density that exceeds that required by the Growth Plan should not be established, rather the establishment of the density for such areas should be developed through the secondary plan process based on an a detailed analysis which reflects the local context. As noted in Part II, Section 44 of the Regional Official Plan:</i></p> <p><i>“The structuring of communities and neighbourhoods and the internal configuration of each of the Local municipalities, for instance, are the responsibilities of the Municipalities as long as the overall planning vision for Halton and policies of this Plan are adhered to.</i></p> <p>5.4 Supporting employment growth and economic activity</p> <p>Significant changes are occurring in the economy, which have been accelerated by COVID, in particular with respect to commercial sector. The long term impacts are unknown at this time. As a result, <i>the</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>Region should allow for flexibility in the location of employment uses, including commercial uses, so that local municipalities can easily adapt in the future in a manner in keeping with the local context.</i></p> <p>5.5 Settlement Expansions</p> <p>The Growth Plan permits limited settlement boundary expansions outside of the Municipal Comprehensive Review (MCR) process. Given the length of time required to carry out a Regional MCR, <i>some relief for small expansions which are supported by the local municipality and meet the criteria in the Growth Plan are appropriate.</i></p> <p>We would like to thank the Region for the opportunity to provide comments on the Discussion Papers. Please contact the undersigned if you wish clarification of these comments.</p> <p>Yours truly, MACAULAY SHIOMI HOWSON LTD.</p> <p>Per: Elizabeth Howson, MCIP, RPP Principal</p> <p>Date: October 28, 2020 Subject: Regional Official Plan Review June 2020 Natural Heritage Discussion Paper Our File: 12-6863</p> <p>Dillon Consulting Limited (Dillon) has completed a review of the 2020 Natural Heritage Discussion Paper (referred to herein as the “Discussion Paper”) and Draft 2019 Natural Heritage System (the “Draft 2019 NHS”); released as part of the Regional Official Plan Review (ROPR) for the Regional Municipality of Halton (the Region). The purpose of this review was to provide comments on the Discussion Paper and Draft 2019 NHS to the Region; which are being submitted on behalf of the Southwest Georgetown Landowner’s Group (SWGLG), for which Dillon is currently providing environmental consulting services.</p> <p>It is understood that a review of natural heritage policies and refinements to the Regional Natural Heritage System (Regional NHS) are proposed as part of the ROPR in order to improve protection to strengthen the long-term viability of the Region’s natural heritage and water resources through land-use planning. Through the ROPR; and as identified through review of the Discussion Paper, and Draft 2019 NHS, the Region plans to update policies in order to:</p> <ul style="list-style-type: none"> • Be consistent with the Provincial Policy Statement (2020) and to conform to current applicable Provincial Plans; • Improve and clarify existing natural heritage policies; • Identify planning objectives needed to preserve and enhance the Regional NHS; and, • Improve the accuracy of the Regional NHS mapping. <p>Background Review</p> <p>To supplement our feedback on the Discussion Paper and Draft 2019 NHS, our review included the following background documents:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Provincial Policy Statement (PPS; 2020); • A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the “Growth Plan;” Office Consolidation, 2020); • Greenbelt Plan (May, 2017); • Regional Official Plan Review Mapping Viewer (i.e. the Draft 2019 NHS mapping); • Regional Municipality of Halton Official Plan (ROP; 2019); • Quality Assurance/Quality Control Process Memo on the draft 2019 Regional Natural Heritage System (March, 2020); • Mapping Audit Technical Memo Review of the Regional Official Plan Natural Heritage System Policies + Mapping (May, 2020); • Policy Audit Technical Memo: Review of the Regional Official Plan Natural Heritage System Policies + Mapping (May, 2020); • Best Practices Review Technical Memo: Review of Regional Official Plan and Natural Heritage Systems Policies + Mapping (May, 2020); • Background Review Technical Memo: Review of the Regional Official Plan and Natural Heritage System Policies + Mapping (May, 2020); • Regional Official Plan Guidelines Draft Environmental Impact Assessment Guidelines (2020); • Regional Official Plan Guidelines Environmental Impact Assessment Guidelines (2014); • Conservation Halton Environmental Impact Study Guidelines (November 2005); and, • Natural Heritage System Definition and Implementation Sustainable Halton Report 3.02 (April, 2009). <p>In addition to reviewing the information listed above, Dillon attended the Rural and Agricultural System and Natural Heritage System combined Public Information Centre meeting on September 18, 2020, as well as a separate meeting for the BILD Halton Chapter with Regional municipal staff on September 28, 2020, to discuss the 2020 Discussion Paper and Draft 2019 NHS.</p> <p>Summary of Comments</p> <p>As a result of our review, we have provided specific comments on the following items on behalf of the SWGLG:</p> <ul style="list-style-type: none"> • Distinction between Linkages, Buffers, Enhancement Areas within the draft 2019 NHS; • Determining Buffers and Role of Vegetation Protection Zones; • Integration of the Provincial mapping (Growth Plan) into the Regional NHS; 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Integration of prime agricultural areas into the Regional NHS; and, • Inclusion of a Water Resource System (WRS) within the Regional NHS. <p>A summary of our feedback for each of the listed topics above are provided below.</p> <p>In addition, responses to the discussion questions provided by the Region within the Discussion Paper that are specific to natural heritage have been provided within Attachment A.</p> <p>Distinction between Linkages, Buffers and Enhancement Areas within the Draft 2019 NHS</p> <p>As described in the Natural Heritage System Definition & Implementation Report created as part of Phase 3: Sustainable Halton Report 3.02 (2009), linkages, buffers and enhancement areas are defined as follows:</p> <p>Linkage Areas and Buffers:</p> <p><i>Ecological linkages are considered at two scales in the environment: Regional linkage corridors ensure continuous linkage across the landscape, and as such they are wider in order to facilitate the long term movement of all plant and animals, in the very long term. The width of regional linkages is consistent with the linkages in the Greenbelt NHS.</i></p> <p><i>Local linkage corridors connect isolated natural heritage features to the larger NHS. While they are narrower they are intended to accommodate the short and long term movement requirements of plant and animals over shorter distances.</i></p> <p><i>Linkage corridors in the Sustainable Halton NHS meet the following guidelines:</i></p> <ul style="list-style-type: none"> • <i>Regional Linkage: 300 to 400 m width; and,</i> • <i>Local Linkage: 60 to 100 m width.</i> <p><i>The Sustainable Halton NHS includes the following minimum buffers intended to protect natural heritage features as follows:</i></p> <ul style="list-style-type: none"> • <i>Woodland Buffer: 30 metres; and,</i> • <i>Wetland Buffer: 30 metres.</i> <p><i>The Sustainable Halton NHS also includes buffers along watercourses based on the following criteria:</i></p> <ul style="list-style-type: none"> • <i>All water watercourses located within the Regulatory Floodline have a 30 metre buffer on both sides; and,</i> • <i>Watercourses located outside the Regulatory Floodline that are determined to provide an important ecological linkage function have a 30 metre buffer on both sides.</i> <p>Enhancement Areas:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>Enhancement Areas include lands that may be without obvious natural heritage features and include areas such as agricultural land, cultural meadow, and cultural thicket, etc. Enhancement areas contribute to the NHS by protecting and restoring critical ecological functions such as, ecological connectivity among natural area patches, surface water catchment areas for wetlands, minimum core area thresholds and improved core area shape that reduce edge effect and enlarge interior habitat.</i></p> <p><i>The size thresholds considered in the creation of the Sustainable Halton NHS follow the minimum core areas defined by Environment Canada (2004):</i></p> <ul style="list-style-type: none"> • <i>Core Area Woodlands: 20 ha;</i> • <i>Core Area Wetlands: 10 ha for marsh/thicket and 20 ha for treed swamp; and,</i> • <i>Core Area Open Habitat: 15 ha.</i> <p>We understand that the mapping layer containing the Linkages, Enhancement Areas and Buffers utilized in the Draft 2019 NHS was created as part of ROPA 38 based on the above descriptions. However, we note that the specific delineation of these layers was not provided in the mapping of the Regional NHS within Map 1 and Map 1G of the ROP (2019), as suggested in the Sustainable Halton Report 3.02 (Figure 3: Conceptual Map of the NHS Development; Attachment B).</p> <p>As stated in the Sustainable Halton Report 3.02 (2009), the preparation of detailed land use plans will allow adjustment of the NHS boundary to take advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies. As part of the Sustainable Halton Report 3.02 (2009), an implementation framework was created in an effort to improve land use planning decisions by providing flexibility in making NHS boundary adjustments to accommodate urban land uses that meet human needs while also achieving the NHS goal of long term protection.</p> <p>The implementation framework for the Sustainable Halton NHS was based on distinguishing identifiable components that make up the NHS and determining the degree of flexibility of each component. These steps include, but are not limited to:</p> <ul style="list-style-type: none"> • Classifying the NHS into its component parts in order to document the underlying reason for identifying each section of the NHS; • Articulating the degree of flexibility of the NHS boundary associated with each NHS component and establish a set of rules or guidelines for adjustment of the final NHS boundary; and, • Identifying the point in the development process and/or the type of study(s) that should be completed to adjust NHS boundaries. <p>As stated in the Sustainable Halton Report 3.02 (2009), because the location of the NHS boundary relies on our current knowledge of varied natural heritage features and functions that undergo natural changes over time and because the NHS is based on several relevant policies; the degree of flexibility will vary throughout the NHS. The report goes on to suggest various levels of flexibility for each of the components, including linkages, buffers and enhancement areas, as described below:</p> <p>Linkage Flexibility:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>There may be substantial flexibility in the location and/or adjustment linkage boundaries. For all linkages, the location must be based on providing ecologically functional connections that maintain a consistent width, however, in some cases an entire linkage could be shifted one way or another providing the ecological function is maintained. In cases where a linkage is centered on a feature, it is important that the feature continue to be included within the linkage, and this may in turn limit the degree of flexibility in moving the linkage. Where a linkage is associated with a watercourse, it may be possible to move the watercourse feature and the associated linkage function, to a new location within the landscape. While the location of individual connections may be flexible, the number of connections should remain the same.</i></p> <p>Buffer Flexibility:</p> <p><i>There is low flexibility for the minimum buffer widths to be applied from the edge of the feature being protected. Field studies are required to make a precise determination of the location of a feature such as a wetland or woodland. In addition, in some cases more detailed studies may recommend a buffer width greater than the minimum 30 m buffer width defined here in order to protect natural heritage features and functions.</i></p> <p>Core Area Enhancement Flexibility:</p> <p><i>There may be some flexibility in determining the final boundary of proposed core area enhancements providing the ecological intent and functionality of proposed enhancement is achieved.</i></p> <p>As stated above, the implementation framework for the Sustainable Halton NHS was based on distinguishing <i>identifiable components</i> that make up the NHS. The consolidation of these components into one layer makes applying various levels of flexibility or other applicable policies of the ROP within this layer impossible, as this was not the intent of the implementation framework.</p> <p>In addition, Section 4.5 of the Discussion Paper notes that “<i>An analysis was completed to refine the components of the NHS including buffers, enhancement areas and linkages. These were evaluated to ensure they were still valid after the updates, identify new enhancement and linkages opportunities and that those identified were consistent with the approach taken for the existing, in-force Regional NHS</i>”. Given the consolidation of these features, it is unclear how this analysis was conducted and it is impossible to identify where refinements to these components have been made as described in the supplementary QA/QC and Mapping Audit technical memos. For transparency purposes, and in order to apply policies or development criteria to these areas, distinction between these three components would be required, in accordance with Figure 3 of the Sustainable Halton Report 3.02 (2009). We recommend that revised mapping be updated to match this conceptual figure to allow practitioners apply relevant policies and scope environmental studies accordingly. Alternatively, this consolidated layer should function as an area of flexibility to apply linkage, enhancement or buffer options on a site specific basis, with no specific restrictions, or policy requirements.</p> <p>Further refinement is also needed to specify additional layers within Enhancement Areas of the draft NHS. Section 3.3 of the Mapping Audit Technical Memo noted that “Centres for Biodiversity” should be specifically delineated from other Enhancement Areas of the Regional NHS since these components were not specifically defined in the 2019 ROP. As per definitions provided in Section 4.6 of the Sustainable Halton Report 3.02, it is understood that Centers for Biodiversity are considered “<i>Large (> 200 ha) areas composed of multiple core areas and their core enhancement areas</i>”... and that these areas are to “<i>provide a variety of different habitats that are supportive of a species ability to complete their</i></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p><i>life cycle.</i>” Based on areas mapped, it cannot be determined what habitats are proposed, or which species are intended to benefit from enhancement activities. To remedy this in the revised Regional NHS, it is proposed that the identification of Centers for Biodiversity be conducted as a result of environmental field studies and identification of candidate and confirmed Significant Wildlife Habitat (SWH), and habitat for Species at Risk (SAR). This recommendation is in line with those proposed in Section 3.3 of the Sustainable Halton Report 3.02, which notes that substantial flexibility should be allotted for the adjustment of these areas should the principles of conservation biology be applied.</p> <p>It is also understood that updated NHS mapping will incorporate Environmentally Significant Areas (ESAs) within the Regional NHS. Additional policies for ESAs will also be included in amended versions of the ROP. As noted above, we request that updated mapping for the Regional NHS identify these areas specifically, to assist in the application of relevant policies for the protection of these features.</p> <p>Determination of Buffers and the Role of Vegetation Protection Zones</p> <p>It is acknowledged that Buffers and Vegetation Protection Zones (VPZ) are terms applied in different planning documents that can have varying meaning. In Halton Region, buffers are used to determine setbacks in the ROP and EIS Guidance documents, whereas VPZ are used to determine setbacks specific to Key Features located outside of settlement areas within the Natural Heritage System of the Greenbelt (GBNHS) and Natural Heritage System of the Growth Plan (NHSGP) (i.e., could be considered “regulated buffers”). We note that the ROP definition for VPZ is different from the simplified version provided in the GBNHS and NHSGP.</p> <p>Upon review of the Policy Audit Technical Memo (2020), we recommend maintaining use of the two terms (i.e. Buffer and VPZ) under the current ROP structure; however, suggest that revisions be made to update the definitions to clarify their respective applications for specific areas. The Buffer term should be maintained as it is more appropriate for application in Settlement Areas. We agree that the current definition for VPZ in the ROP should be revised to match the updated definitions for VPZ provided by the GBNHS and NHSGP.</p> <p>In addition, specific policy guidance should be provided for the application of Buffers in Settlement Areas; clear direction is needed to identify how Buffer determination should be flexible, and consider sensitivities of the NHS as a result of future studies or proposed adjacent land uses. For example, a 30 m buffer/VPZ is currently recommended to protect Key Features of the Regional NHS, as well as Core Features identified in provincial mapping. This setback does not, however take into consideration the current existing conditions or the proposed land use to occur within adjacent lands. As identified in the Sustainable Halton Report 3.02, 2014 and 2020 (draft) Regional Environmental Impact Assessment Guidelines, Conservation Halton Environmental Impact Assessment Guidelines, and the 2020 Best Practises Review Technical Memo, the precise boundary of the Regional NHS and determination of buffer/VPZ widths are to be determined through the completion of environmental studies. It is recommended that the further refinement of protective buffers be determined using results of site specific environmental studies, as well as through consultation with the Region, local municipalities, and conservation authorities. Additional revisions to policies should also identify permitted uses within buffer areas (i.e. SWM Facilities, Low Impact Development measures, and trails).</p> <p>Integration of Provincial Mapping into the Regional NHS</p> <p>As discussed in Section 3.2 of the Discussion Paper, the Region plans to harmonize natural heritage policies of the updated Growth Plan (2020) and Greenbelt Plan (2017) as part of the ROPR. This is in line</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

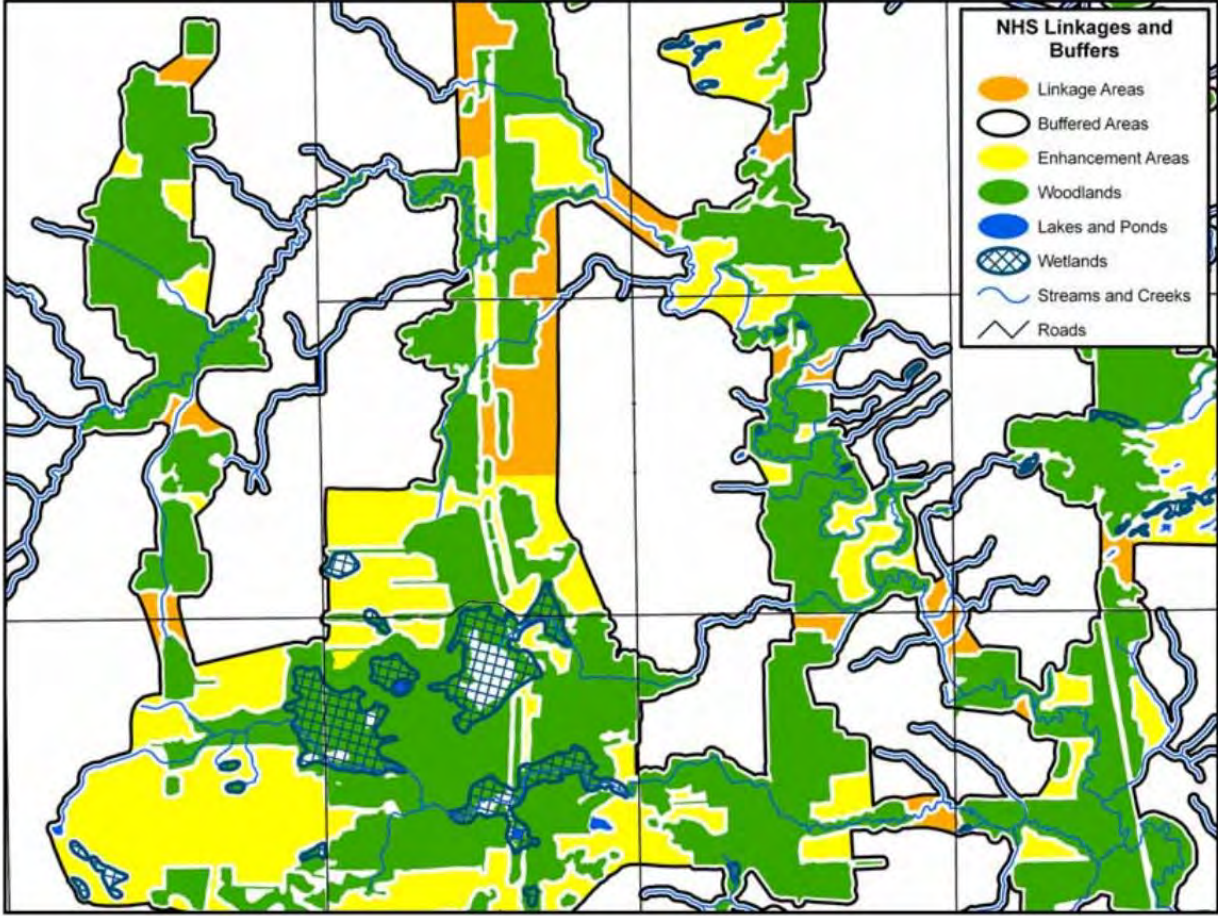
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		<p>with new policies of the Growth Plan (2020); the GBNHS already exists within mapping for the Regional NHS as an overlay. Further updates are required to incorporate updates of the NHSGP into policies of the ROP and Regional NHS mapping. Using this rationale, the draft 2019 NHS mapping now includes a layer for the NHSGP without any refinements.</p> <p>Upon review of Section 4.3.3.1 and Section 4.2.2.2, the NHSGP is intended to be included “<i>as an overlay in official plans.</i>” Furthermore, Section 4.2.2.5 of the Growth Plan allows municipalities to refine the Provincially-mapped NHS: “<i>In implementing the Natural Heritage System, upper- and single-tier municipalities may through a municipal comprehensive review, refine provincial mapping with greater precision in a manner that is consistent with the plan.</i>” As a result of this text, it is recommended that the mapping layer for the NHSGP remain only as an overlay for reference purposes, and not be incorporated into the Regional NHS. This will allow for flexibility in applying the Provincial NHS, where the policies of the ROP prevail, etc. Areas within this overlay which are currently mapped as Enhancements, Linkages and Buffers should be refined; it is understood that a request has been sent to the Province from the Region to amend the Provincial mapping from Settlement Areas.</p> <p>Our recommendations for the inclusion of an NHSGP overlay are consistent with Option 2 of the Discussion Paper and with policies provided for the Greenbelt Plan (2017). As per Section 3.2.2 (5) of the Greenbelt Plan, which states “<i>when official plans are brought into conformity with the Greenbelt Plan, the Natural Heritage System may be refined, with greater precision, in a manner that is consistent with the plan and the system shown on Schedule 4.</i>” This policy recognizes and acknowledges that Regional NHS boundaries may be refined as a result of more detailed information becoming available through future planning exercises provided that the original goal of the Regional NHS is met. This policy is consistent with the implementation framework that was originally proposed in the Sustainable Halton Report 3.02.</p> <p>Integration of the Agricultural System and Prime Agricultural Areas into the Regional NHS</p> <p>Prime Agricultural Areas are defined as specialty crop areas, prime agricultural areas and associated Canada Land Inventory Class 4 through 7 lands. As per Section 1.2.1 and Section 4.2.6 of the Growth Plan (2020), the long-term viability and productivity of Prime Agricultural Areas are to be protected, supported and enhanced; the Prime Agricultural Area designation is to occur outside of Settlement Areas within the Agricultural System. The Agricultural System is currently depicted in Map 1E of the ROP (2019).</p> <p>Recent changes to the Growth Plan (2020) require that Prime Agricultural Areas including specialty crop areas be designated within the municipal plans. To conform to the Growth Plan (2020) and to show the relationship between the natural heritage features and the Regional Agricultural System, the Region has proposed options to map these areas together as part of the ROPR. Four options were reviewed in the Discussion Paper. Based on our review, we recommend that Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage System Overlay) be carried forward into revised ROP mapping. Under this approach, the Key Features and Prime Agricultural Areas are represented as land use designations under a Natural Heritage System Overlay. Under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features) interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and Identifying Key Features. In keeping with recommendations provided earlier in the memo, we reiterate that separate layers for Linkages, Buffers and Enhancement Areas be provided in revised ROP mapping to assist with the identification and application of relevant policies.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Inclusions of a Water Resource System within the Regional NHS</p> <p>As illustrated in Section 6.2 of the Discussion Paper, changes to the PSS (2020), the Growth Plan, 2019) and Greenbelt Plan (2017) identify the need to define and protect a Water Resource system (WRS). Within the Growth Plan (2020), the WRS is defined as “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.” As stated in Section 4.2.1.2, the WRS is required to provide long-term protection to Key Hydrologic Features, Key Hydrologic Areas and their functions. Key Hydrologic Features consist of wetlands and watercourses, whereas Key Hydrologic Areas consist of aquifers and groundwater recharge areas, etc.</p> <p>Based on our review of Section 6.2 of the Discussion Paper, mapping proposed to separate the Regional NHS and WRS is preferred (Option 2). While it is likely that some overlapping will occur, and features will be mapped in both the Regional NHS and WRS, it is agreed that the separation of these two systems will clarify that different policies will govern Key Natural Heritage Features and Key Hydrologic Features versus Key Hydrologic Areas. The inclusion of Key Hydrologic Areas within mapping for the Regional NHS would be confusing to readers, since Key Hydrologic Areas are not protected within the Regional NHS.</p> <p>Summary</p> <p>We appreciate the opportunity to review and participate in the ROPR. Based on our review of the materials listed above, we request that further information and layers be provided in the ROP and revised mapping for the Regional NHS be provided to specifically delineate areas identified as Linkages, Enhancement Areas, and Buffers. A single term should be carried forward in the amended ROP to identify appropriate setbacks (i.e. VPZ versus Buffer); furthermore, it is recommended that buffer widths be determined as an inclusive process that considers the results of field studies, the proposed adjacent land uses, and consultation with agency contacts. It is also requested that mapping of Provincial Plans be included as an overlay only and not integrated within the proposed Regional NHS. Furthermore, it is requested that layers for the WRS be kept separate from mapping for the Regional NHS.</p> <p>Enclosed Attachment A – Responses to NHS Discussion Paper Questions</p> <p>Attachment B – Relevant Excerpts from Policy Planning Documents</p> <p>Appendix A</p> <p>Responses to NHS 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> <ul style="list-style-type: none"> • Upon reviewing Section 3.3 of the Natural Heritage Discussion Paper for the Regional Official Plan Reviewer (June, 2020), Option 2 (Harmonize the Provincial NHSs) is preferred for incorporating the NHSGP into the ROP. 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • In this scenario, layers for the NHSGP and GBNHS would be combined and added as an overlay to the Regional NHS. While it is acknowledged that overlap would exist in policies of the NHSGP and GBNHS, differences would be reconciled through policy. • As mentioned in Section 3.3 of the Natural Heritage Discussion Paper, this approach would allow flexibility to include policies that reflect local considerations for the Regional NHS, rather than have the more restrictive policies apply (Option 1 and 3). <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> <ul style="list-style-type: none"> • Refer to comments on implementation of the linkages, buffers, and enhancement areas. These goals and objectives were not met through ROPA 38 and the same mapping has been carried forward to the Draft 2019 NHS. <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> <ul style="list-style-type: none"> • While natural heritage policies of the 2020 PPS do not address the delineation of buffers, the Greenbelt Plan and Growth Plan require a minimum of 30 m vegetation protection zones (VPZ) from Key Features. In accordance with the Greenbelt and Provincial mapping, Map 1G of the ROP currently has 30 m buffers applied to Key Features. Buffers within Map 1G are subject to refinement within the Region. As per Section 116.1 of the ROP, the <i>“boundaries of the Regional NHS may be refined with additions, deletions and or boundary adjustments, through.</i> <ul style="list-style-type: none"> ○ A subwatershed study accepted by the Region and undertaken in the context of an Area-Specific Plan; ○ An individual Environmental Impact Assessment accepted by the Region, as required by the ROP; or, ○ Similar studies based on terms of reference accepted by the Region.” • Similar refinements to buffers proposed for area-specific land uses have been put forward in the 2014 Ecological Buffer Guideline Review prepared for Credit Valley Conservation, as well as in the 2017 Framework for Regional Natural Heritage System Buffer Widths Refinements. • Moving forward, we recommended maintaining use of the two terms (i.e. Buffer and VPZ) under the current ROP structure; however, suggest that revisions be made to update the definitions to clarify their respective applications for specific areas. The Buffer term should be maintained as it is more appropriate for application in Settlement Areas. The current definition for VPZ in the ROP should be revised to match the updated definitions for VPZ provided by the GBNHS and NHSGP. • It is also recommended that minimum buffer standards not be provided in the ROP to continue to allow flexibility in area-specific land use planning. This approach is consistent with procedures currently utilized by the Region and local municipalities, in where appropriate buffer widths are determined based on the significance and sensitivity of the ecological feature and functions to be protected. These assessments would also consider the proposed negative impacts likely to be 	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>associated with the adjacent land use activities. The delineation of buffers for Key Features should be determined through consultation and collaboration with local municipalities, conservation authorities, as well as with the Region.</p> <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> <ul style="list-style-type: none"> • Based on our review of the four options provided in Section 5.3, Option 2 (Prime Agricultural Areas and Key Features are designated with a Natural Heritage System Overlay) should be carried forward into revised ROP mapping. Under this approach, the Key Features and Prime Agricultural Areas are represented as land use designations under a Natural Heritage System Overlay. • Under this option, it is clear how the interface between these three features (Prime Agricultural Areas, the Regional NHS and Key Features) interconnects. This option is also considered the easiest to interpret visually, and meets the Provincial direction for designating Prime Agricultural Areas and Identifying Key Features. • In addition to the layers proposed in Option 4, we also recommend that separate layers for Linkages, Buffers and Enhancement Areas be provided in revised ROP mapping to assist with the identification and application of relevant policies. <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> <ul style="list-style-type: none"> • Based on our review of Section 6.2 of the NHS Discussion Paper, knowledge and experience in working in neighbouring municipalities, Option 2 (Separate the NHS and WRS) is the preferred option. While it is likely that some features will be mapped in both the Regional NHS and WRS, it is agreed that the separation of these two systems will clarify that different policies will govern Key Natural Heritage Features and Key Hydrologic Features (wetlands and watercourses) versus Key Hydrologic Areas (Aquifers, groundwater recharge areas, etc.). The inclusion of Key Hydrologic Areas within mapping for the Regional NHS would be confusing to readers, since Key Hydrologic Areas are not protected within the Regional NHS. <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> <ul style="list-style-type: none"> • A Natural Heritage Strategy would assist the Region by providing a framework for initiatives to align goals of the Regional NHS to action items of the Region’s Business Plan. It is recommended that the development of a Natural Heritage Strategy should be an iterative process, and should be completed using an advisory committee with representation from land development, local farmers, and municipal staff. Consultation should occur throughout multiple check-points of the strategy’s development to ensure the framework meets the needs of all stakeholders. <p>7. Should the ROP incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • No comment. <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> <ul style="list-style-type: none"> • No comment. <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> <ul style="list-style-type: none"> • No comment. <p>10. How can Halton Region best support the protection and enhancement of significant woodlands, through land use policy?</p> <ul style="list-style-type: none"> • In addition to size criteria currently provided in Section 227 of the ROP (2019), qualitative data should also be considered to determine woodland Significance. • Woodlands containing ELC polygons consisting of predominantly invasive species (e.g., black locust) should not meet criteria for significance. • Woodlands containing ELC polygons consisting of mostly dead trees infested with emerald ash borer (or other diseases) should rely on the results of additional wildlife and environmental studies in order to identify the biological value provided by the feature in order to determine if the feature meets criteria for significance. It is acknowledged that dead trees provide some ecological value, however we request that this be assessed on a site-by-site basis. <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> <ul style="list-style-type: none"> • To improve transparency in available mapping the Region should provide separate layers to identify Linkages, Buffers, and Enhancement Areas in the updated NHS. • It is unclear how layers for Linkages, Enhancement Areas, and Buffers were reviewed during QA/QC evaluations of the draft 2019 NHS. Please provide additional details to confirm. • It is understood that the Region has applied a 30 m buffer to Key Features identified within the draft NHS. Little information is provided as to how Linkages and Enhancement Areas have been determined in the 2020 NHS discussion paper, the March 2020 Memo for the Quality Assurance/Quality Control Process of the draft 2019 Regional NHS, or in the May, 2020 Mapping Audit Technical Memo. Please provide further details on these items and provide separate mapping layers to independently delineate these items. • Refer to comments on Linkages, Buffers and Enhancement Areas in the attached memo. <p>Appendix B</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="646 249 1342 278">Relevant Excerpts from Policy Planning Documents</p> <div data-bbox="1597 314 1945 364" style="text-align: right;"> <p>North-South Environmental Inc. Specialists in Sustainable Landscapes Planning</p> </div> <p data-bbox="655 395 1597 421">Figure 3. Conceptual Map of NHS Development Step 3. Identify Ecological Linkages and Buffers</p>  <p data-bbox="655 1338 1470 1382"><i>Sustainable Halton Phase 3 Report 3.02 - Natural Heritage System Definition and Implementation April 7th, 2009</i></p> <p data-bbox="1889 1362 1945 1382" style="text-align: right;"><i>page 8</i></p>	<p data-bbox="1982 284 2769 344">Comments are acknowledged. Please see above for a detailed response.</p>
44.	Tracy Breckon	<p data-bbox="646 1433 1115 1461">Attached per email dated 2020-10-29</p> <p data-bbox="646 1497 1261 1526">RE: Halton Region Regional Official Plan Review</p> <p data-bbox="646 1562 876 1590">To All Concerned,</p> <p data-bbox="646 1626 1954 1786">As landowners and farmers in Halton we are concerned with the ROPR Draft mapping, of our property as well as, adjacent and nearby properties on which we are tenants. We find that there are several inaccuracies in the mapping; example: a large section of our forest is marked as swamp, when it is not, and tree lined laneways are marked as 'Escarpment Natural Areas', when those trees have been so carefully planted in a row, whether 20 or 150 years ago.</p>	<p data-bbox="1982 1433 2862 1751">Regional staff conducted a site visit on May 20, 2021, to review the candidate's significant woodlands that have been identified on the property. As you are aware, the candidate significant woodlands are identified by Halton Region as a Key Feature in the Regional Natural Heritage System in accordance with the Regional Official Plan policies. Based on the site visit, refinements to the candidate significant woodlands mapping will be made through the next update of the proposed draft Natural Heritage System Mapping that will be released as part of the 3rd Regional Official Plan Amendment during Phase 3 of the Regional Official Plan Amendment.</p>

No.	Source	Submission	Response
		<p>Halton agricultural areas are also facing another layer of designation with the Natural Heritage System and we are wondering if this will indeed allow us to continue in normal farming practices with agriculture as a permitted use, or if it too will become another layer of restrictions with the associated applications, timing delays, and increasing costs that will adversely affect our operation.</p> <p>Prime Agricultural Areas, Provincial Prime Areas outside of ROPA38 Prime Agricultural Areas, ROPA38 Prime Agricultural Areas, and Proposed Draft Prime Agricultural Areas in Halton need to be given a higher priority. The business of farming needs more protection, and we need to protect farmland with increased incentives, or new regulations for landowners that are not farmers, to keep their lands in food production. The final paper of the Halton Rural Agricultural Strategy , Aug, 4, 2016, Action D3.1 clearly outlines this sentiment. As stated on Page 12 of the Rural and Agricultural Discussion Paper, the agricultural land base in Halton at present is unable to supply the full food needs for the current Regional population, we are at a critical moment in planning and implementing appropriate actions to address this concern.</p> <p>We request more information with regards to Figure 14 on page 34, Prime Agricultural Areas Comparison, '#6 Area for Discussion', in the Rural and Agricultural Discussion Paper, as it appears to affect our property.</p> <p>We agree, agricultural businesses, or those that are 'value added' or directly support Agriculture and/or farm gate receipts should be allowed in agricultural areas, without adversely affecting the character of the agricultural areas. Other commercial businesses should be in hamlets or urban areas.</p> <p>Thank you for the opportunity to contribute to the discussion. We look forward to receiving further information regarding our property and our concerns.</p> <p>Sincerely,</p> <p>Murray and Tracy Breckon</p>	<p>Regional staff recognizes concerns regarding greater protections for farmland. 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. 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. Moreover, 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 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 through their respective planning tools to manage any on-farm diversified uses that have a high potential for impact. Additionally, individual landowner and/or property-specific inquiries will continue to be addressed as the ROPR progresses.</p>
45.	West End Home Builders' Association	<p>Attached per email dated 2020-10-30</p> <p>West End Home Builder's Association Regional Official Plan Review Consultation and Discussion Papers</p> <p>Attention: Mr. Curt Benson, Director, Planning Services and Chief Planning Official</p> <p>The West End Home Builders' Association (WE HBA) is a proud member and local association of both the Ontario Home Builders' Association (OHBA) and the Canadian Home Builders' Association (CHBA). We are the voice of the residential construction industry across Hamilton, Burlington, Oakville, Milton, and Halton Hills, and the greater Halton Region, supporting the needs of our members and the home-buying public. Our Association represents and advocates for 280 members as a voice for the land development, home building and renovation industries. Our membership includes builders, developers, suppliers, trade contractors, manufacturers, financial institutions, mortgage insurers, warranty providers, housing agencies, as well as service and professional companies. WE HBA members build and/or develop approximately 3500 housing units a year, ranging from singles and towns to mid- and high-rise, multi-storey developments. In Halton Region, the building and renovation industry provides over \$3 billion in investment value and employs over 26,000 people. Residential construction is a vital economic driver to every community in Canada.</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 the 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 in Halton's local municipalities</p>

No.	Source	Submission	Response
		<p>The WE HBA has been closely monitoring the Regional Official Plan Review and Integrated Growth Management Strategy. We are pleased to participate in all aspects of the review as the Region plans and prepares policies intended to guide the future development and redevelopment with a new planning horizon of 2051. We are encouraged that the Region recognizes the importance and benefits of effectively engaging our industry throughout this process.</p> <p>WE HBA would like to take this opportunity to provide our preliminary feedback on the Discussion Papers out for consultation regarding the Regional Official Plan Review and Integrated Growth Management Strategy (IGMS). We are intending to delegate at the November 18th Special Council Meeting on this item and expect to provide additional comments at that time.</p> <p>WE HBA is supportive of the advancement of a Regional vision for growth that is compatible with and supported by local municipal plans and priorities and in conformity with existing Provincial planning policies and plans. Regional and local planning initiatives that speak to growth and intensification to a new planning horizon of 2051 are of the utmost importance to our members.</p> <p><u>IGMS & Regional Urban Structure Discussion Paper</u></p> <p>After reviewing the various discussion papers and questions contained within, we are providing a high-level response to several of the topics that are included in these papers. From our perspective, the Regional Urban Structure Discussion paper is of the highest priority to the Association and our membership. The home building industry is one of the largest economic drivers in the Province. Various Provincial policy documents speak to the amount and speed of growth that is expected to occur throughout the Province over the next 30 years. Schedule 3 of the Growth Plan for the Greater Golden Horseshoe (GGH) includes a 2051 population forecast of 14.87 million for the GGH. In the next 30 years, this results in an approximately 5 million forecast population increase, from the 2019 reference population of 9.977 million for the GGH. This translates into about 2 million new homes that will need to be built, in a variety of housing types and tenures. These forecasts and policies are crucial in considering where this growth is to occur as we plan for the future.</p> <p><i>Planning Horizon to 2051 versus 2041</i></p> <p><i>Each of the Discussion Papers references a Provincial planning horizon of 2041, indicating Halton Region is required to plan to accommodate 1 million people and 470,000 jobs by 2041. Since August 2020, the Growth Plan for the Greater Golden Horseshoe has been amended, and the planning horizon updated to 2051. The growth forecasts have also changed, and the Halton Region is now required to accommodate 1,100,000 people and 500,000 jobs by 2051. At this time, it is difficult to provide specific advice as to how the Region should proceed in regard to the direction of where the growth will be allocated, when the planning horizon being considered does not reflect the most recent Provincial requirements. How Halton manages this growth, and where it is directed, will ensure the efficient use of existing lands and municipal infrastructure, and the ability for the Region to meet the required targets to 2051.</i></p> <p><i>Urban Growth Centres</i></p> <p><i>The Regional Official Plan recognizes 3 Urban Growth Centres (UGC)s in the Halton Region. While it is not our intent to speak to every discussion question that is raised throughout these papers, Question 1 of the Regional Urban Structure Discussion paper asks how the Region can further</i></p>	<p>and also limiting urban development impacts on the Natural Heritage System.</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 are also exploring the development of a best practices resource for green development standards which local municipalities may consider when introducing and/or updating their standards. Regional staff recognize the work the local municipalities have undergone in the development of their own green development standards and will continue to support local work on green development standards where appropriate, rather than embedding these standards into ROP policy. With regard to 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> <p>More fulsome details are available in the Policy Directions Report.</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>Natural Heritage</p>

No.	Source	Submission	Response
		<p><i>support appropriate growth and intensification in the Urban Growth Centres. UGCs, as defined by the Growth Plan, are existing or emerging downtown areas, meant to be the focal points for development of a community; they contribute to public services, infrastructure, employment, and population. All UGCs have been planned around these principles. The Province underwent a thorough review and study before assigning the existing UGCs to the locations where they currently exist. The location, size, and configuration of the UGCs was re-confirmed this year through Amendment 1 to "A Place to Grow".</i></p> <p><i>WE HBA believes that the best way that the Region can further support growth and intensification in these areas is to ensure that future growth is allocated and directed to the existing UGC areas. We also note that the Region of Halton as whole has not been able to achieve its existing intensification target (as included in the existing ROP) not to mention the impacts of the significant intensification that will be required to be accommodated by 2051. Minimum density targets are just that, minimums, and municipalities are encouraged to go beyond the minimum requirements. WE HBA encourages the Region to consider the assignment of minimum density targets that go beyond the Growth Plan required minimum targets for UGCS.</i></p> <p><i>In line with our ongoing concerns with the boundaries of the Burlington UGC, WE HBA will be providing a detailed submission on the Supplementary Discussion Paper. At that time, we will formally state our position that the boundaries of the existing Downtown Burlington UGC must be maintained and supported. A UGC is designated and intended to be planned to promote and encourage vibrant, transit-supportive, and mixed-use urban communities. We are not opposed to the UGC in Downtown Burlington being expanded to incorporate the lands surrounding the Burlington GO area in order to achieve these greater goals. However, removing the core of the Downtown lands of Burlington from the UGC, as has been proposed by the City and as noted in the Supplementary Discussion Paper, is contrary to the long-standing Provincially-designated growth area designation that was established by the Province in 2006.</i></p> <p><i>Amendment 1 to A Place to Grow directs even greater growth numbers to Halton Region, as a whole, to be achieved by the year 2051. The Region is determining the fair-share of growth that each municipality must accommodate. The 2051 growth allocations have yet to be completed by the Region and the distribution of the amount of new growth will have a direct relation to the future urban structure of the Region. The removal of lands from existing, provincially designated and defined Urban Growth Centres is contrary to Provincial policy and the Housing Action Plan.</i></p> <p><i>Strategic Growth Areas</i></p> <p><i>We recognize that the Region is considering a range of possibilities in terms of the most effective areas to be the focus of the accommodation of intensification and higher-density, mixed-use development in a more compact built form. As noted above, we also recognize that the Region is obligated to identify, delineate and assign density targets to existing and future strategic Regional growth areas, that are intended to accommodate increased intensification requirements established by the Province of Ontario. The Region as a whole as been unable to satisfy its existing intensification policies and the Region of Halton must develop and promote policies that enable the necessary intensification to occur. While the actual function and ability to accommodate growth withing each of the strategic growth areas may not be apparent at this time, we do agree that these areas are important and effective plans and policies are required to enable this growth to be achieved. However, as the 2051 population and employment growth allocations have yet to be confirmed by the Region of Halton, we are unable to comment further at this time. Confirming population and</i></p>	<p>Thank you for providing comments on the Discussion Papers and outlining WE HBA's support for a balanced approach to Natural Heritage System planning which prioritizes flexibility, chalrity and efficient applicability of policies while not imposing the most restrictive policy framework. Halton ROP's Planning Vsion focuses on proper balance among protecting the natural environment, preserving Prime Agricultural Areas, enhancing its economic competitiveness and fostering a healthy, equitable society. This Planning Vision is not changing through the ROPR and balance will continture to be a priority.</p>

No.	Source	Submission	Response
		<p><i>employment allocations to 2051 should be the top priority for the Region at this time. This is the first step that is necessary, to ensure the most fulsome and robust consultation with industry stakeholders. We look forward to commenting in the future on how the Region plans to direct the growth targets to 2051 and what additional strategic growth node opportunities exist to further assist in accommodating this population growth.</i></p> <p><u>Natural Heritage and Climate Change Discussion Papers</u></p> <p>The Natural Heritage Discussion Paper addresses the Region’s need to protect and enhance the natural environment. WE HBA supports the principle of a Regional natural heritage system and the protection of its key features. The identification of the natural heritage system is important for guiding where future growth areas can go, how much developable land is available and if settlement boundary expansions are feasible.</p> <p>The most important concept that we would like to highlight from this discussion is that balance is key. A balance is needed that will protect significant elements of the natural environment while also respecting the Provincially directed goals of intensification and smart growth in our communities. We agree that the Region’s Official Plan Review process provides an opportunity to refine the Regional policy framework to find the balance between the various Provincial and Regional policies and plans that apply to the Region’s natural heritage areas.</p> <p>In terms of the three options presented on how to represent Halton’s Natural Heritage System most clearly, we do not support a specific option, however we again stress that balance is essential when approaching natural heritage system planning. Provincial priorities have shifted, and the Growth Plan and Official Plan policies both stress the need for efficient transit and intensification and growth; balanced consideration of provincial policies and professional judgment when addressing environmental considerations is crucial in today’s planning framework. The selected option for sufficiently representing Halton’s Natural Heritage System should prioritize flexibility, clarity, and efficient applicability of the policies, while not imposing the most restrictive policy framework.</p> <p>Finally, WE HBA is supportive of the priority that Halton Region is placing on addressing the impacts of climate change. Recognized in the various Discussion Papers, the rapid increase in population growth that is expected in the Region means that carbon emissions are going to continue to rise unless significant changes are made. The Regional Official Plan rightly acknowledges that there is a direct correlation between making buildings more energy efficient and communities more compact, and the lowering of carbon emissions. Directing growth towards compact and mixed-use communities, with higher densities and a mix and range of housing types, supports the climate change efforts towards adaptation and mitigation and promotes resilience into the future.</p> <p>The WE HBA respectfully submits the above feedback on the Region of Halton’s Regional Official Plan Review consultation on the various Discussion Papers. We are pleased to see the Regional Official Plan Review moving forward and focused on ensuring that growth and intensification can be accommodated adequately by all municipalities within the Region, while respecting and effectively implementing mandatory Provincial policy requirements and the investments that have been made by our industry and the public sector within the Region’s primary growth areas , and ensuring that the minimum targets of the Growth Plan can be achieved and surpassed by 2051. We look forward to taking part in further consultation and discussion on both the future Urban Structure matter and the greater Regional Official Plan Review. We would be happy to speak further to the enclosed should Council or Staff wish.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		Sincerely, Kirstin Jensen, MPI, MA Manager of Planning & Government Relations West End Home Builders' Association	