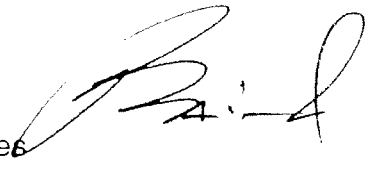




TO: Members of Development Services Committee

FROM: Jim Baird, Commissioner of Development Services 

PREPARED BY: Elisabeth Silva-Stewart

DATE: October 27, 2009

Re: Draft York Region Official Plan

On October 13, 2009, Development Services Committee received a presentation and report from Valerie Shuttleworth, Director of Planning and Urban Design entitled 'Draft York Region Official Plan'. Development Services Committee called for a workshop to be scheduled to discuss Town comments on the Regional OP. The workshop of Development Services Committee and Town staff took place on October 23, 2009.

Attached is a revised Appendix 'A' (Specific Town Comments and Suggestions on the York Region Official Plan) incorporating the modifications and additional comments discussed at the workshop on October 23.

A suggested revised resolution is also attached to reflect the direction coming out of the DSC workshop. Clauses in the original October 13 DSC resolution which are now redundant (in light of the workshop having now been held) are suggested for deletion. A new clause is also suggested to be added, to reflect the direction coming out of the workshop on October 23 to the effect :

“ 4) That the policies and mapping related to new communities and any urban expansion (including strategic employment lands) within the Town of Markham contained in the draft Regional Official Plan be deferred until the Town of Markham's Growth Management Strategy is completed and endorsed by Town Council.”

The revised resolution and Appendix 'A' reflecting the DSC workshop of October 23 are submitted to Council for authorization.

PROPOSED REVISED RESOLUTION
for
October 27, 2009 Council Meeting
6(b) Report No. 63 - Development Services Committee (October 13, 2009)

- 1) That the presentation by Mr. Jim Robb, Friends of the Rouge Watershed, at the Development Services Committee on October 13, 2009, be received; and,
- 2) That the presentation provided by Ms. Valerie Shuttleworth, Director of Planning and Urban Design regarding the Comments of the Draft Regional Official Plan, at the Development Services Committee on October 13, 2009, be received; and,
- 3) That the report dated October 13, 2009 to Development Services Committee entitled "Draft York Region Official Plan", and Appendix 'A' , as modified through the Development Services Committee Workshop held October 23, 2009, be received and forwarded to the Region as Markham's response to the Region's request for input on the draft Regional Official Plan; and,
- 4) That the policies and mapping related to new communities and any urban expansion (including strategic employment lands) within the Town of Markham contained in the draft Regional Official Plan be deferred until the Town of Markham's Growth Management Strategy is completed and endorsed by Town Council .
- ~~4) — That Development Services Committee members forward any item(s) to staff that need to be pulled from "Appendix A" for further discussion at the Workshop, by Friday October 16, 2009 and any items not pulled be forwarded to the Region as Markham's preliminary response to the Region's request for input on the draft Regional Official Plan; and,~~
- ~~5) — That a Special Workshop of the Development Services Committee meeting be held to discuss the "pulled" comments and final comments from the Workshop be provided to the Region as Markham Council comments on the draft Regional Official Plan; and further,~~
- 6 5) That Staff be authorized and directed to do all things to give effect to this resolution.

APPENDIX A

Specific Town Comments and Suggestions on the York Region Official Plan

OP Section	Comment	Suggested Wording (if applicable)
CHAPTER 1: Introduction		
CHAPTER 2: A Sustainable Natural Environment		
2.1	Suggest identifying key areas for grade separated pedestrian or wildlife crossings as part of the Regional Greenlands system to support the regional trail system and biodiversity.	
2.1.3	This policy states that the "Regional Greenlands system includes regional linkages". Regional linkages should be a defined term in order to distinguish them from corridors and local linkages.	new definition
2.1.9	The local system should be recognized.	This policy should state that: "in new community areas, local official plans shall include policies, programs and initiatives that link and enhance local and Regional Greenlands systems".
2.1.9	Why are enhancement opportunities in the new community areas only focused on the Natural Heritage System in the Greenbelt Plan? Why not in the local Greenway system? The region should support enhancements on the watercourses and woodlots outside of the Greenbelt Plan boundary.	
2.1.10	This policy describes a local greenlands system within the new community areas shown schematically on Map 2. Map 2 does not identify a local greenlands system or the new community areas.	We suggest "The Regional Greenlands System, as may be further enhanced with a local greenlands system shall be permanently protected from development and site alteration".
2.1.11	The uses identified should be subject to both the Regional Official Plan and the Greenbelt Plan, not just the Greenbelt Plan. This policy provides guidance for uses and activities in the Regional Greenlands System within the "new community areas", but there is no equivalent policy which speaks to land uses in the Regional Greenlands System "outside of the new community areas".	
2.1.12		Add 'to reflect and confirm Regional and local Greenlands systems' following the word 'Plan'.

New Policy or enhance 2.1.26		"The Region shall support the multi-jurisdictional Rouge Park connecting Lake Ontario to the Oak Ridges Moraine in eastern Markham, Whitchurch-Stouffville and Richmond Hill contained within the Regional Greenlands System. Within the recognized Rouge Park lands, land uses shall be permitted in accordance with both the Greenbelt Plan and the Rouge North Management Plan."
2.2.1	The Region should be more descriptive in defining the key natural heritage and hydrologic features which are protected. For instance the Provincial PPS and the Region both have a definition for significant woodlands but the policies do not distinguish which layer of 'significant' woodlands is used.	
2.2.2	This policy states fish habitat (2.2.1.b) is identified on the maps cited, which it is not. Lakes and their littoral zones are not identified on the maps (Map 4 identifies Kettle Lake and waterbody only). Figure 1 identifies Earth Science areas but this feature is not identified in the policies (only 'life science areas' are noted).	
2.2.3 and 2.2.4	These policies include references to studies that would be prepared. The policy should identify to who's satisfaction.	
2.2.31		Add to the end of policy. "Where new wetlands are created through restoration of public lands, the Region will not require an amendment to Map 4 of this Plan to add the wetland feature."
2.2.35	Suggest additional wording:	Add "to remove significant woodlands from Map 5", following the word "required".
2.2.38 & 2.2.39	These policies are not consistent with the Town's approach endorsed through the EPRC, which in principle would not permit development and site alteration into woodlands to facilitate urban development in new communities. The Town asks that this policy be deleted.	
2.3.	The Region should clarify what 'water systems'.	
2.3.4	This policy directs development away from sensitive groundwater recharge and discharge areas. The policy does not provide enough direction to local municipalities to determine where these areas are. The Region should provide mapping of these areas or a clear definition.	

2.3.5	This policy directs mapping and policy changes to reflect significant recharge areas or vulnerable aquifer areas, but there is no existing mapping which identifies significant recharge areas so there is no map to amend. Map 7 identifies only the Aquifer Vulnerability Areas on the Oak Ridges Moraine. Policy 4 refers to "sensitive" recharge and policy 5 refers to "significant" recharge. These terms should be defined.	
2.3.8	What benchmarks are used of assessing the sustainability of activities and land uses?	
2.3.9	Local municipalities are regulated to protect, enhance and monitor municipal drinking water systems. It is not clear if this clause refers to the ecological water system or the municipal drinking water system.	
2.3.11	This policy should identify who is responsible for the review and approval of community water management plans	
2.3.11	Preparation of community water management plan which emphasizes more comprehensive water conservation as part of secondary plan development is progressive from environmental perspective – more direction about purpose and content of plan is needed. The Region should define Community Water Management Plan.	
Natural Hazards	The preamble should state the jurisdiction for floodplain management is with the Conservation Authorities including mapping and updates to floodplains since floodplain mapping is not part of the Region's mapping products.	
2.3.26	This policy directs that local municipalities and conservation authorities ensure climate change effects are considered in flood management. Without knowing what the effects of climate change are, municipalities cannot ensure that these are considered in flood management and natural heritage areas. We suggest a more proactive approach by including a policy that directs the Region to work with its partners to prepare new infrastructure standards and development guidelines to address long-term climate change effects.	
2.3.27	This policy states that the goals and objectives of the watershed plan shall be achieved through the implementation of this plan. The watershed plan is a multi-jurisdictional plan with most actions directed at the local level, as well as other partners. New wording suggested:	The goals and objectives of watershed plans shall be supported through the implementation of this Plan and local Official Plans.

2.3.32	What is a "community water management plan"? What benchmarks are used to review and approve these plans? Community water management plans should speak to % of permeable surface of lot coverage.	
CHAPTER 3: Healthy Communities		
3.2.5	This policy should identify who would be responsible for the health, environmental and cumulative air quality impact studies noted.	
3.2.6	Changes to wording suggested:	That sensitive uses such as schools, daycares and seniors' facilities be physically separated to the extent possible from significant known air emissions sources such as controlled access provincial 400-series highways and heavy industrial uses.
3.3.	The Region deals with the provision of human services in section 3.3., but there is no statement around what the Region's expectations are of fire services and safety.	
3.4.	This section assumes all heritage is 1000 years old and point 12 refers to cultural heritage celebrations. This section should identify cultural heritage as "including those places and events that are significant to residents and communities." eg the first Hindu temple in the Region	
3.4.1	Reference should be made to the development of a Register as indicated in the Ontario Heritage Act. Properties on a register can delay demolition for up to 60 days and can allow the time needed to designate.	To encourage local municipalities to compile and maintain a list of significant cultural heritage resources and other significant heritage resources as part of a register of property of cultural heritage value and interest , in consultation with heritage experts, local heritage committees and other levels of government.
3.4.2	These properties should be conserved in such a way that their heritage values, attributes and integrity are retained.	To ensure that cultural heritage resources under the Region's ownership are conserved in such as way that their heritage values, attributes and integrity are retained.
3.4.3	It's important to define what is meant by "conservation". Should also include this term in the Definitions part of the OP.	To require local municipalities to adopt official plan policies to conserve significant cultural heritage resources. Conservation includes identifying heritage resources, interpreting their significance, protecting through physical and legal means and using cultural heritage resources in responsible and sustainable ways that serve both individual needs and community interests.

New policy Insert	Reference should be made to the key mechanism or tool that is used to conserve heritage resources.	To encourage local municipalities to use the provisions of the Ontario Heritage Act to conserve cultural heritage resources through individual property designation, the creation of heritage conservation districts, heritage easements and financial assistance programs.
3.4.4	Explain how awareness can be obtained. Second part is removed as it is covered in new policy above and use of "develop" makes it sound like we should be intensifying heritage areas with new development.	To promote heritage awareness through education, interpretation and communication opportunities.
New policy insert	Region should participate in financial assistance programs such as the heritage tax reduction program operated at the local municipal level.	To support and participate in financial assistance programs that help conserve cultural heritage resources, where feasible.
3.4.8	Both the Region and local municipalities should be using urban design standards that are complementary to the local heritage environment. Also should apply to heritage conservation districts as well.	To support the use of local and regional urban design standards in core historic areas and heritage conservation districts that reflect the areas' heritage, character and streetscape.
3.4.9	Reference heritage conservation districts in addition to core historic areas. Also the access and parking should complement the cultural heritage landscape.	To encourage access to core historic areas and heritage conservation districts by walking, cycling and transit, and to ensure that the design of vehicular access and parking complements the historic built form and cultural heritage landscape.
3.4.12	There should be a new objective related to 3.4.12, including policies for diverse culture. This section should identify cultural heritage as "including those places and events that are significant to residents and communities." eg. the first Hindu temple in the Region.	should add 'including those places and events that are significant to residents and communities'
3.5.5	The requirement that new secondary plans shall have a strategy to implement affordable housing policies "to achieve a mix and range of housing types within each level of affordability" and "to ensure larger sized, family units within level of affordability" - who determines levels of affordability and how are they defined? The Region should clarify this policy and make the distinction between low and moderate household incomes. To implement this Policy 3.5.5, Markham will develop a high level Affordable and Special Needs Housing Strategy recognizing that there may be a need for further housing analysis and more detailed planning exercises at the Secondary Plan level that will determine specific needs and requirements, and actions necessary to implement affordable and special needs housing.	

3.5.6 & 3.5.7	The targets for new affordable housing units are across the Region and with Regional Centres and Corridors are aggressive. The Town will be looking to the Region for a commitment to provide guidance on how to achieve Markham's contribution towards these targets. This policy should make it clear that it will not be applied on an application by application basis.	
3.5.9	Policy 3.5.9 should be reworded to provide a stronger commitment by the Region to development of an <u>affordable housing implementation framework</u> .	
3.5.10	The current wording is awkward since the Region has no direct role in applying Section 37 height and density incentives or reducing municipal fees and charges...we suggest new wording for this policy	"To work with local municipalities, the private sector and other stakeholders to consider innovative financial arrangements to encourage and support the development and maintenance of non profit and affordable housing."
3.5.14	Special Needs Housing is defined and should be in italics.	
3.5.17	Policy 3.5.17 needs to be addressed as part of affordable housing implementation framework to be prepared by Region...to this date there has been no sites identified by Region anywhere across the Centres and Corridors particularly in the current review of the Markham Centre and Langstaff Gateway secondary plans	
3.5.22	Although Markham currently has Official Plan policies, Council has not supported "as-of-right" secondary suite zoning on a municipal wide basis as required in 3.5.22. The recent policy direction of Markham Council (May 2009) is to enforce current Town zoning by-laws prohibiting second suites.	
New Policy	Require local Zoning By-laws to permit a mix and range of housing types, lot sizes, unit sizes, functions, tenures and levels of affordability within each community...not sure how the Town would address unit sizes, functions, tenures and levels of affordability...would be looking to Region for guidance on implementation.	
3.5.23	How would the Region prohibit the DOWN ZONING? What is the trigger? There should be a process for review in place of 'prohibition'.	
CHAPTER 4: Economic Vitality		
4.2 Intro	Regional Centres and corridors must include a mix and range of housing and social supports such as food, healthcare and daycare if they are to be live-work communities.	
4.2	Should add 'Using good urban design and public art to help create identity and image of the Region as a place for creativity and innovation'	

4.3	What is employment? A definition should be included to define 'employment'.	
4.3.10	The Town's Employment Lands Strategy (Phase 1) assumed that all vacant lands within the current settlement area, designated for employment, would be available to accommodate employment, in order to reinforce current policy and minimize the need for additional land outside the current settlement area. In this regard, all employment lands, designated and proposed, are considered "strategic", in meeting the intent of the draft ROP to accommodate employment growth. The inclusion of policies in the draft YROP suggesting that only some employment lands are "strategic" is confusing and could undermine Town policies aimed at the preservation of all employment lands required to accommodate the forecast employment growth. It would be preferable for the draft YROP to confirm the strategic importance of <u>all</u> employment lands needed to accommodate existing and future employment. Staff support identifying the location of lands to be protected for employment purposes after 2031 to ensure that future employment is well-located and that consideration of future employment development can be taken account of during 2031. However, the Region should defer this identification until the studies (eg. Employment Lands Strategy) and the Growth Management Strategy are completed. Circles should be removed from the map and language should be in place of it.	
4.3.12	What is meant by 'including but not limited to'? This wording allows a lot of room for interpretation of what is included as being considered employment lands in the conversion policy. It becomes problematic for interpreting the application of this conversion policy in areas that accommodate employment and other land use designations such as community amenity area, and especially in mixed-use situations. It will result in inconsistent conformity implementation of this policy as different municipalities within the Region will have different ways of interpreting this policy.	
4.3.15 & 4.3.16	Policies related to ancillary uses within employment areas, need to be clarified. Without definitions explaining what is meant by 'employment area' and 'employment land area', it will be difficult to know to what extent the ancillary use policies apply. Staff see definitions for these terms as essential to ensuring consistent interpretation and implementation of these policies.	

4.4.5 & 4.4.6 & 4.4.7 & 4.4.8	The significance of the policies addressing 'Major Retail' in the draft ROP is heightened by the absence of a definition of the term. Staff concur with the draft ROP policy direction of not permitting 'Major Retail' on designated or strategically located employment lands, however, by leaving it to individual local municipalities to define 'Major Retail', the draft ROP permits possible inconsistencies in the interpretation and implementation of the Region's policies through the various conformity exercises by local municipalities. Potentially, the absence of a definition could also leave interpretation to the Ontario Municipal Board. A definition in the draft ROP would 'level the playing field' for all municipalities, using the same criteria to define 'major retail'. This is especially critical with respect to the implementing the draft ROP policies dealing with 'conversion' of employment land to 'Major Retail'. The draft ROP does contain a policy requiring a Regional Impact Analysis for new retail facilities in excess of 30,000 square metres of gross leasable area. The Region needs to clarify whether this floor area is what is meant by 'Major Retail' and over what property configuration the area measurement is applied.	
New policy	The YROP policies should also consider potential for 'retail contagion' when a 'Major Retail' development is introduced immediately adjacent to an 'Employment Area'. A policy which requires further study to consider the impacts of 'Major Retail' on an adjacent 'Employment Area' should also be considered.	
4.5.1	Requires a full cost accounting for financial management that considers the economic, environmental and social costs (triple bottom line) but again no direction on how to accomplish this or weigh 3 parameters is given i.e. how do you evaluate and weigh social impact? Should insert the words 'triple bottom line' in this policy.	

4.5.14	The draft ROP's financial management components are very similar to the Town's financial management components contemplated for inclusion in the Town's emerging Growth Management Strategy. Staff would, however, recommend to the Region an additional clause under Policy 14 that considers not just the impact on operating budgets, but examines the alignment of capital expenditures to growth-related assessment revenues from a timing perspective. The timing of the capital expenditure should give consideration to the timing of new assessment revenues, in order to cover operating costs that result. If the alignment is not close (e.g. a road is built but the comparable assessment growth that requires the road to be constructed doesn't happen as quickly as expected), existing residents are then required to increase the amount of taxes they pay to cover the operating costs associated with the new infrastructure, in advance of the increase in growth-related assessment revenues.
CHAPTER 5: An Urbanizing Region	
5.1.4	The Provincial Policy statement requires that sufficient land be designated to meet the projected needs for a maximum time horizon of 20 years. The PPS also requires planning authorities to establish and implement phasing policies to ensure specified targets for intensification and redevelopment are achieved prior to or concurrent with, new development within designated growth areas. It would be helpful if the Region could identify or provide a specific policy that would support Markham's efforts to phase in development permissions for intensification and redevelopment.
5.2 Preamble	The preamble speaks to evolving into zero carbon and zero waste community but the policies do not support the statement. Energy Star standards will not contribute to a zero carbon community. Zero Carbon Energy should be added. Also a timeline associated with this needs to be added.
5.2 new policy	consider a policy on encouraging green roofs.
5.2 new policy	consider a policy for bird-friendly development.
5.2 Preamble	There is no mention of cultural or economy in the description. The introduction to this section is energy and building focused which are elements of sustainability but not the complete picture.
5.2.3 & 5.2.4	Talk about prioritizing walkability and cycling but the Region's Great Streets document seems to be automobile-centric.

5.2.8a)	Talks about mobility when it should be talking about access and connectivity.	
5.2.8 new policy	should add a point that adds reference to minimizing energy use.	minimizes energy use'
5.2.8 new policy	should include public realm spaces and support good urban design and public art	add "public realm spaces that reflect and support good urban design and public art".
5.2.9	Eludes to but does not talk about vertical integration of different land uses.	
5.2.10 new policy	Should add a point to include 'underground parking to minimize stormwater runoff and heat islands where appropriate'.	
new policy	should add a policy to require that surface parking areas should be designed to support redevelopment and retrofitting.	
5.2.16	Retrofitting for water efficiency in existing development should be discussed to relieve the strain on existing/aging infrastructure.	
5.2.17	LEED is referred to as a standard - it should not be as a trademark certification. Energy/environmental reductions/improvements need to be defined.	
5.2.17 & 5.4.9 etc.	For every point that discusses LEED® – the goal of carbon neutral, zero waste, and water efficient buildings is great but neither the region nor Markham has the regulatory authority to mandate this – the region should work with the province to create higher building code standards and the municipalities to allocate infrastructure as a tool for achieving "green" buildings. While a good standard, LEED® is not a regulatory tool. It is easy to mandate LEED® rather than creating the tools that we really need to get what we want.	
5.2.17 & 5.4.9 & 5.6.12	LEED targets identified in Policy 5.2.17 seemed to get repeated in City Building Policy 5.4.9 and Building Complete Communities Policy 5.6.12 ...overall there is a lot of repetition of sustainable development policies and targets throughout Chapter 5...might be preferable to concentrate all the policies and targets in the sustainable cities, sustainable communities chapter and reference policies in Regional Centres and Corridors and Building Complete Communities..this would reduce and clarify specific policies that apply distinctly to Regional Centres and Corridors and Building Complete Communities.	
5.2.19	Should add wording regarding LEED ND.	Add 'and to encourage LEED ND once approved for use in Canada.' to the end of this section.
5.2.20	What tools do we have to encourage retrofitting ground related residential to Energy Star or any other standard? If we are trying to keep York Region viable before an energy crunch we need commitment, tools, and money from the region.	

5.2.21	Should consider thinking bigger to take advantage of opportunities of the Green Energy Act - our Sustainability Office suggests 25%.	
5.2.25 and others	The goal should be to gain trees.	Everytime it is mentioned "greening to provide shade," we should say 'planting climax tree species'
New policy	To establish, in co-operation with the Province and local municipalities, common density and intensification measurements, definitions and monitoring tools: The key words in this policy is establishing common density and intensification measurements. In particular, how FSI targets will be applied on a development block basis. The figure in the margin on page 54 shows how development blocks can be identified by the local municipality, however, the definitions of the development block must also be flexible to extend beyond local roads and accommodate essential land use program and built form transition requirements. It is suggested that a new policy be provided to help municipalities define development blocks that are flexible enough to accommodate land use and built form requirements.	
New policy	There needs to be a point about requiring secondary plans within 500m of Viva stops to be redesigned if not already built out to leverage the transit infrastructure investment better.	
New policy	Should add a point that requires every residence within urban boundaries of the region be within 500m of a park or passive open space.	
5.3.3d)	Policy 5.3.3d) requires the local municipal intensification strategies shall identify appropriate density ranges for intensification area that support the intensification matrix framework...The Town's intensification strategy will make reference to preliminary density ranges to be confirmed through more detailed planning exercises at the Secondary Plan level.	
New Policy	Should there not be a policy addressing the Provincial Accessibility Standards?	
5.3.7	open spaces should also provide opportunities for community gardens.	
5.3.7 new policies	add :	add 'cultural spaces that reflect changing demographics and public art'; And add 'Transit buildings and shelters that incorporate public art'

	This policy and document needs to clearly state that bringing services together into transit hubs and public buildings like schools and major recreation complexes is needed for efficiency and access. The welcome centre being an example of one stop shopping. There will be more and more integration of services as senior government tightens its belt (and York Region is already underfunded) so a model of delivery of services has to be part of this plan.	
5.3.11		A minimum requirement that 35% of new housing units in Regional Centres and Corridors be affordable offering a range of compact housing forms and affordability for moderate income households.
5.4.6e)	The wording is awkward ... we suggest similar wording to 3.5.7 and suggest eliminating references to tenure and intrinsically affordable units.	Instead of "greening to provide shade," we should say 'planting climax tree species'.
5.4.6h)	We want trees.	
5.4.6j)&k)	These policies address public art but the 1% needs to be added to York projects then it becomes a requirement in every section of the plan.	
5.4.6 j)&k)	these sections highlight public realm but these policy ideas need to be reiterated in each section or they will not be implemented.	
5.4.6n)	What does "weather-protected system or pedestrian and cycling paths and facilities" mean? Are we covering every trail and sidewalk?	
5.4.8	Should note that on-street parking is permitted.	
5.4.12 & 3.5.9 & 3.5.10 & 5.4.10	Does policy 5.4.12 overlap with other implementation frameworks and financial instruments for affordable housing in Policy 3.5.9 and Policy 3.5.10 and the implementation strategies for Regional Centres and Corridors in Policy 5.4.10.	
5.4.12	Will Policy 5.4.12 also address policy 5.4.6p) and Policy 5.3.11 as they relate to the provision of human services?	
5.4.15	Policy 5.4.15 requires local municipalities to enact Section 37 OP and Zoning Provisions...is the wording of this problematic given it is at the discretion of the local municipality and the landowner to negotiate Section 37 benefits through a zoning by-law amendment...suggest wording on next column instead:	"Work with local municipalities to enact Section 37 OP and Zoning Provisions as they relate to the Regional community benefits listed."
5.4.15b)	How is social housing defined?	
5.4.15c)	Should be mandatory, not a bargaining chip.	
5.4.20d)	Should require block perimeters no larger than 500m instead of leaving this to interpretation by saying "fine grain blocks".	

5.4.20 new policy	Should add a policy that ensures sequencing of local retail development with residential development to ensure retail is economically viable.	
5.4.20g)	You're going to need a lot of employment land if left like this.	Reword to say "legal working age resident to employee ratio of 1:1"
5.4.20	Policy 4.1.1 reads "to create high quality employment opportunities for residents with the goal of 1 job per every 2 residents" then Policy 5.4.20 requires "the planning and implementation of Regional Centres will provide an overall resident-to-employee target ratio of 1:1"...not sure if this is achievable on the Markham portion of the Langstaff Gateway lands other than at and adjacent to the Langstaff/Longbridge subway station...suggest that the policy be reworded to target only lands in Regional Centres that have the potential for a high mix of residential and employment density like subway stations or mobility hubs.	"for only lands in Regional Centres that have the potential for a high mix of residential and employment density like subway stations or mobility hubs"
5.4.22	How is an urban growth centre defined in this document?	
5.4.23 & 5.4.33	How is 'at, and adjacent to' (subway station) defined?	
5.4.29	Map 1 shows regional corridors - only identifies Highway 7 as regional corridor - Isn't Yonge still a corridor? It is very difficult to discern that Yonge south of 407 is still a regional corridor.	
5.4.33c)	33c) what does this "appropriate floor space index" mean?	
5.5 Local Centres and Corridors	General point - Regional corridors' relationship to type and function of retail is important. It may be necessary to down zone auto oriented uses and encourage commercial activities around transit stops along corridors currently composed of auto oriented businesses and huge areas between smaller scale centres see new centres may emerge as we become "more local." We do no talk about emerging main streets anywhere.	
5.6.10	The Region should include 'solar ready' and 'component green roof' in this wording.	
5.6.11	In this policy the Region is specific about who prepares the Community Energy Plan (Town).	
5.6.14	Water Management Plans. Who prepares? Who approves?	

5.6.15 & 5.4.6n)	Mobility Plans. Who prepares? Who approves? And for new community areas only? Policy 5.4.6n) requires the Town to prepare and implement in cooperation with the Region and related agencies a mobility plan to include in secondary plans for Regional Centres and Corridors...there may be resource implications for completing these mobility plans.	
5.6.17	This policy directs the preparation of a Regional Greenlands Plan, but ignores how the local natural heritage system should be addressed in the large scale new community planning process. This policy should be specific to the Region and local municipalities coordinating and working together to identify the protection and management of the combined Regional Greenlands and local natural heritage system to ensure local desire to implement Greenway System.	
5.6 Hamlets	The preamble states that hamlets are only located within the Greenbelt and ORM. This is not the case in Markham. Victoria Square is not encumbered by the Provincial Plans.	
CHAPTER 6: Agricultural and Rural Areas		
6.3 Agriculture and Specialty Crops	The preamble should state that the agricultural designation is an overlay and that underlying designations prevail. The Agricultural and Rural Area on Map 8 does not carve out the Regional Greenlands System, Hamlets, Rural Residential etc.	
page 70	The side bar should list ALL farmers markets - some are missing from this list.	
New Policy	This suggested policy is necessary as the agricultural and rural area identified by the Region includes non-agricultural land use designation.	"Local municipalities will (or may) further refine the agricultural and rural area in local official plans".
Policy 6.3.11	This policy states that an agricultural justification report is not required for the new community area agricultural lands. There should be a policy to state that a justification report would be required for conversion of lands not within the new community area.	
6.3.14	It is suggested that the Region add "and sustainable" whenever it mentions Local Food - - to read "Local and Sustainable Food".	add "and sustainable" whenever it mentions Local Food - - to read "Local and Sustainable Food".
New Policy	The Region needs to include a policy that confirms the applicable policies or hierarchy of policies for the eastern Markham lands. These are identified both as the Regional Greenlands System which kicks in all the policies of Section 2.1, including policy 22 specific to natural heritage system, and Agricultural Area which kicks in the policies of 6.3.	

New Policy			"Agricultural lands in eastern Markham have been acquired and identified for Rouge Park purposes by public agencies. In addition to the agricultural uses identified in Policy 6.3.2, park related uses as identified in the Rouge North Management Plan and accompanying Detailed Site Management Plans may be permitted."
New policy		There should be a definition and goal related to 'food security'.	
Should map:		For information purposes, it would be helpful to identify the federal land holdings in East Markham as these policies would not be subject to those lands.	
CHAPTER 7: Servicing Our Population			
General		How are we going to reconcile the differences in the land use projections? In the Master Servicing Study (MSS) and Markham Transportation Strategic Plan (MTSP), we are using population and employment projections at the traffic zone level from Markham Policy Section.	
Various ref.		"Climate Change" is mentioned in a number of locations, please elaborate or explain what strategies are anticipated	
7.1		With reduction in demand for services, will the Region revise its design standards?	
7.1 New policy			To reduce leakage and improve water infrastructure efficiency through implementation of District Management Areas, in co-operation with local municipalities.
7.2 New policy		Add a policy to work with local municipalities to develop alternative Regional street design parameters (lane width, intersection spacing, daylight triangle dimension, boulevard width, etc.) to encourage walkability and urban context in nodes and along corridors	
7.2 New		There needs to be discussion about proportional funding. That is, we expect a walkable, transit oriented, cycling friendly place but spend a large portion of our transportation funding to accommodate motorists – we cannot achieve our goals under this unbalanced funding model.	
7.2.25 f		Intermodal terminals or hubs in urban area should not have large parking supply (restrict to handicap and carpool parking). More parking could be provided at end of line/terminal stations.	
7.2.26		These should be minimum transit modal split as some centres may be targeting higher transit modal split	
7.2.31		Fare intergration is one of the major key to increasing transit usage in York Region - move this policy further up to show its importance	

7.2.41c)	streets must be within a hospital environment that supports independent, safe, mobility and daily access to nature and community.	
7.2.43	We expect bicycle lanes or multi-use pathways on or adjacent to arterial roads regardless of whether the road is widened to six lanes or not. The other fundamental policy that governs this issue to a certain extent is that the Region doesn't construct or maintain pedestrian or cycling facilities with-in the ROW. This becomes a local government responsibility. To help us they created the Municipal Partnership Program which provides up to 50% of the capital costs for ped/cycling facilities that provide a regional benefit/context and to date we've received approx. \$300K in funding to support the Major Mack MUP.	
New Policy	Should add a policy to ensure protection for existing neighbourhoods for noise attenuation measures.	
New Policy	Should add a policy to ensure street widening to be undertaken only after roads are maximized.	
7.2.51	Should the Region be requiring the full ROW as designated in the ROP as indicated in 7.2.49? Or is this policy related to land taking not as part of a development application?	
7.2.52	If left as worded, we could still have huge unwalkable blocks.	Rather than saying 'Exceptions may be made for centres and corridor main streets', we should state that 'In centres and corridors we will create blocks with perimeters that are no greater than 500m and development access will only be permitted from side streets'.
7.3.4	Will this section limit the flexibility of the Town in directing where growth should be? The provision of servicing is the responsibility of Markham which will use the parameters described to manage growth	
7.3.6	There are rural estate designations within Markham's OP that permit new growth with private wells and septic systems. This clause should be clarified to restrict full municipal services to new subdivisions only.	
7.3.24	The Region is not only minimizing the impact but it must meet or exceed Provincial standards/guidelines	
7.3.29	How is the planning and design of infrastructure consider potential impacts from climate change? Are we talking about flood protection or something else?	
7.3.33	to clarify this policy add the following [next column]:	add 'provided that drinking water quality is not deteriorated' before the words 'where permitted by York Region Master Plan and Provincial Plans.'
7.4.	The Region should clarify that Recovery doesn't include incineration.	

7.4.	The MOE only recognizes 3Rs. The 4th R - recovery - is not recognized as a diversion option by the Province.	
Preamble	Should include something about zero waste as an objective.	Second paragraph change "...zero waste ideal" to "...zero waste objective."
7.4.19	It is suggested that this policy be replaced with "To pursue zero-waste, bio-mass, bio-gas technologies."	"To pursue zero-waste, bio-mass, bio-gas technologies."
7.5.14g)	Document calls for development and operating of an energy from waste system for York Region. This implies incineration, which doesn't align with Markham's position on diverting as much as possible and pursuing sustainability.	
CHAPTER 8: Implementation		
8.2.3	This policy identifies measuring and reporting tools to monitor progress towards the targets established in the plan. This policy is not very comprehensive. This should also speak to the Regional natural heritage coverage target of 25%. "Energy efficiency standards" should be specific to the Energy Star and LEED targets noted in the plan. What about the transit modal split targets? Community services?	
8.2.3	Their reporting and monitoring tools should align and be coordinated with what we are doing in this regard – notably with respect to sustainability – energy, water, waste reduction, otherwise there will be duplication of efforts between local municipalities and the region.	
8.3.8	This policy identifies local OP's which are not eligible for exemption. Retail is mentioned but employment is not.	
8.3.8g)	Should also include applications which are not consistent with the Growth Plan.	Should add 'and Growth Plan' after 'Provincial Policy Statement'.
Table 3 Regional study requirements to the amendments to the ROP	No mention of Agricultural Justification for a proposed amendment on lands outside of the new community areas. Transportation and Servicing studies should reflect all Regional 'development' Official Plan Amendments. There are potential non-development related ROPA's which would not require a transportation or servicing study. Why does the Region require an Oak Ridges Moraine Conformity Study but not a Greenbelt Plan Conformity Study? There is very little policy direction about what should be included in some of these studies, who reviews and who approves.	
New Table	There should be a new table which summarizes all the studies identified in the Regional Official Plan, when they are required and who reviews and approves. This should also address consolidated studies where the region and municipality require a similar study.	

8.4.5	It might be a bit premature to suggest an employment designation for the redesignation of Greenbelt lands.	
DEFINITIONS		
	This definition is identical to the PPS definition with a further definition of low and moderate income households. However some things which need to be considered include: (1) how are low and moderate income households determined within the lowest 60% of the income distribution for the regional market area - Is it the distinction between low and moderate household incomes? (2) new secondary plans shall have a strategy to implement affordable housing policies "to achieve a mix and range of housing types within each level of affordability" and "to ensure larger sized, family units within level of affordability" - Who determines levels of affordability and how are they defined?	
AFFORDABLE		
ALTERNATIVE ENERGY SYSTEMS	Should change this to: Sources of energy or energy conversion processes such as co-generation , energy from bio-mass or energy from bio-gas that significantly reduce the amount of harmful emissions to the environment when compared with conventional energy systems.	
	Should add a definition to explain how 'at, and adjacent to,' in sections 5.4.23 and 5.4.33 are defined.	AT, and ADJACENT TO,
	Should add definition	SIGNIFICANT WOODLANDS
	Should add definition	SENSITIVE OR SIGNIFICANT RECHARGE AREAS
	Should add definition	CONSERVATION OF SIGNIFICANT CULTURAL HERITAGE RESOURCES
	What is employment? A definition should be included to define 'employment'.	EMPLOYMENT
	Should add definition	EMPLOYMENT AREA AND EMPLOYMENT LAND AREAS
	Should add definition	KEY DEVELOPMENT AREA
	Should add definition	NET ECOLOGICAL GAIN
	Should add definition	SOCIAL HOUSING
	Should add definition for Strategic Employment Area and should they not just reference future strategic employment lands (ie. Langstaff Gateway, Markham Centre) so as not to undermine significance of existing employment lands in South Don Mills and 404/7 corridors	STRATEGIC EMPLOYMENT AREA

	Should add definition	MAJOR RETAIL
	Should add definition for regional linkages in order to distinguish them from corridors and local linkages	REGIONAL LINKAGES
	Should add definition	URBAN GROWTH CENTRE
MAPS		
Map 1 Regional Structure	Map 1 shows regional corridors - only identifies Highway 7 as regional corridor - Isn't Yonge still a corridor? It is very difficult to discern that Yonge south of 407 is still a regional corridor.	
Map 2 Regional Greenlands System	Map 2 shows a Greenlands System Vision but that vision, shown as a tone and arrow, is not described in the policies. There is no direction provided on what the arrow means (securement?, trails?). The light pink tone is not identified in the legend. Why does the big fat 'Greenlands Vision Arrow' go through urban Stouffville and the Federal lands and not hug the major protected Little Rouge Creek corridor? This map should remove all the tone that is not the Greenlands system so it easy to ready and apply the policies.	
Map 3 ESA's and LSA&SI	Map 3 is not legible. Only the Life Science Areas and ESA's should be identified. In Markham the Highway 407 caption is located on top of the feature so the boundary of the ESA is not shown.	
Map 4 Key Hydrologic Features	Same comments as Map 3 - remove all the unnecessary layers. It is very difficult to locate the permanent and intermittent streams with the multitude of colour. 'Waterbody' is identified as a tone but this does not match the description of the features to be protected on page 10.	
Map 5 Significant Woodlands	Same comments as Map 3 - remove all unnecessary layers. The Rouge Park layer only identifies the Little Rouge Creek corridor and not the Bob Hunter or eastern Markham lands.	
Map 7 ORM Aquifer Vulnerability	Where is the policy reference to this map? This should be the model for Maps is 2 - 5 it is clear and easy to read.	

Map 8 Agricultural and Rural Area	This map should somehow reference the new community areas. The ORM boundary in eastern Markham appears to be identified as Greenbelt. The agricultural land use designation sits on top of the environmental designations. How is this read?	
Map 10 Cycling Master Plan	York Region Cycling Plan is predicated on the widening of arterial roads, therefore if the roads aren't widened the region doesn't seem to contemplate converting/adding a cycling facility in the ROW. This is a problem since there is significant public opposition to arterial road widening.	
Map 11 Transit Network	The Region should extend the priority transitways into the whitebelt lands proposed for urban expansion.	
Map 11 Transit Network	Proposed GO station locations on Havelock Subdivision is to be subject of a separate study	
Map 12 Street Network	Hwy 48 between Major Mackenzie Drive and 16th Avenue has been transferred from MTO to the Town - change for all figures/map	
Figure 2	The Region should drop all circles from the Town of Markham as we are currently refining a growth management strategy and the Town will identify these areas to the Region at a later time. The Region should defer the Town of Markham from being included on this Figure until the Region has the benefit from the views of the Town.	