

Draft York Region Official Plan – June 2009 - Submission Analysis

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October 27, 2009 Resolution from Development Services Committee, approving report from October 13, 2009 Development Services Committee

Submission Author:
Town of Markham

Comments or Requested Change to Draft Official Plan

Analysis and Recommendation

RESOLUTION 5 OF COUNCIL MEETING NO. 15 DATED OCTOBER 27, 2009:

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 Draft ROP before Committee and Council will show the Urban Area expansion in Markham conceptually illustrated by two asterisks, in the same manner as the Draft ROP dated June of 2009. Regional staff's land budget work indicates that these areas are required to accommodate Markham's forecasted population and employment. Regional staff propose to bring forward an amendment (No 1) to the ROP in early 2010 that will specifically identify the Urban Area expansions in East Gwillimbury, Markham and Vaughan in keeping with the Provincial Places to Grow: Growth Plan for the Greater Golden Horseshoe.

Regional Greenlands System

Map 2 –The Greenway System vision should extend along the Greenbelt protected corridors of the Little Rouge Creek connected to Bruce's Mill Conservation Area to take advantage of the natural heritage opportunity rather than through settlement lands and agricultural lands. The Little Rouge Creek corridor in Markham is identified to support the contiguous Rouge Park connection to the Oak Ridges Moraine.

Agreed. The Regional Greenlands System Vision arrows have been changed as per Markham's recommendations.

Suggest identifying key areas for grade separated pedestrian or wildlife crossings as part of the Regional Greenlands system to

The Town of Markham's Plan has the ability to provide this level of specificity in the Natural Heritage Network. These will

support the regional trail system and biodiversity.

also need to be identified as part of Environmental Assessment work on Road improvements.

Policy 2.1.3 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.

Regional Staff have opted not to define Regional Linkages in order to provide flexibility in implementation. Potential linkages are shown as part of the Greenlands System Vision arrows.

Recommendation: New Definition

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.

The Region supports enhancement throughout the Regional Greenlands System, however, has prioritized the Natural Heritage System in the Greenbelt as the lands most in need of enhancement at a Regional scale. The local official plans can be more specific on additional enhancement areas throughout local greenlands systems.

Policy 2.1.9 should recognize the local system.

Recommendation: "in new community areas, local official plans shall include policies, programs and initiatives that link and enhance local and Regional Greenlands systems".

Policy 2.1.10 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.

Map 2 does not differentiate between local greenlands and the Regional Greenlands System, however, local greenlands have been incorporated in the mapping.

Recommendation: "The Regional Greenlands System, as may be further enhanced with a local greenlands system shall be permanently protected from development and site alteration".

Draft June policy 2.1.10 (Revised December policy 2.1.11) has been revised to:

That local greenlands systems within *new community areas*, identified in accordance with policies 2.1.4 and 2.1.10, and shown schematically on Map 2 of this Plan within the Regional Greenlands System, shall be

permanently protected from development and site alteration.

The uses identified in Policy 2.1.11 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”.

The intent of this policy is to clarify land uses for the Greenlands System within new community areas to ensure that new communities are connected, complete communities. The local official plans can be more specific with regard to permitted uses throughout local natural heritage systems.

Policy 2.1.12 - Add ‘to reflect and confirm Regional and local Greenlands systems’ following the word ‘Plan’.

Draft June policy 2.1.8 (Revised December policy 2.1.8) addresses this issue by requiring an Environmental Impact Statement for development applications within 120m of the Regional Greenlands System.

Policy 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.”

This policy has been added to section 6.1 of the Regional Official Plan.

Key Natural Heritage Features and Key Hydrologic Features

Policy 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.

Definitions for many of the key natural heritage and hydrologic features have been added to the Plan.

Policy 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).

This policy has been corrected to identify fish habitat as an unmapped feature. Permanent and Intermittent streams, Kettle Lakes, and wetlands are identified on Map 4 as key hydrologic features.

Earth Science ANSIs are addressed in Draft June policy 2.2.50 (Revised December policy 2.2.56) with respect to Landform Conservation.

Policies 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.

The local official plan has the ability to provide this level of specificity.

Wetlands

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."

Draft June policy 2.2.30 (Revised December policy 2.2.36) has been changed, "To encourage local municipalities, public agencies and private landowners to protect *wetlands* not identified in this Plan, and to create new *wetlands* or enhance existing *wetlands* where appropriate."

Significant Woodlands

Policy 2.2.35 - Add "to remove significant woodlands from Map 5", following the word "required".

Policy has been changed to reflect recommended wording.

Policies 2.2.38 and 2.2.39 - These policies are not consistent with the Town's approach endorsed through the Environmental Policy Review and Consolidation, 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.

These policies have been amended as follows:

Draft June policy 2.2.38 (Revised December policy 2.2.44) That notwithstanding policy 2.2.43 of this Plan, in order to integrate the Regional Greenlands System enhancement objectives with the intensification and compact community design objectives of this Plan development and site alteration may be permitted within part or all of a significant woodland if all of the following are met:

- a. the woodland is located in the Urban Area;
- b. the woodland is located in an area strategic to the achievement of the community objectives of Section 5.6 of this Plan or is identified within an intensification area detailed in a local municipal intensification strategy, and is evaluated through a secondary plan process, or other appropriate study;
- c. the woodland does not meet criteria in policies 2.2.39.a and 2.2.39.b of this Plan;
- d. the woodland is outside of the Regional Greenlands System;
- e. the woodland is a cultural community; as defined by the Ecological Land Classification; and
- f. development or site alteration within part or all of the woodland does not affect the ability of a retained portion of the woodland and/or adjacent woodlands to remain significant in accordance with the criteria in policy 2.2.39 of this Plan.

Draft June policy 2.2.38 (Revised December policy 2.2.45) That should policy 2.2.44 apply, a woodland compensation plan shall be completed to the satisfaction of York Region. Woodland compensation will provide ecological gains to the Regional Greenlands System in new community areas or adjacent areas.

Water Systems

Section 2.3 - The Region should clarify what 'water systems'.

The introductory paragraph lists what water systems are included.

Policy 2.3.4 - This policy directs development away from sensitive groundwater recharge and discharge areas. The policy does not

Policy 2.3.4 has been revised to:

To direct development away from sensitive surface

provide enough direction to local municipalities to determine where these areas are. The Region should provide mapping of these areas or a clear definition.

water features and sensitive groundwater features.

This is consistent with section 2.2.1.d of the PPS, and the italicized terms have been defined in the Regional Plan.

These areas are being mapped as part of the Source Water protection process and will be identified in the Assessment reports currently underway that will form the basis for source water protection plans.

Policy 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.

Agreed. Sensitive and significant groundwater and recharge areas have been added to the definitions.

Policy 2.3.8 - What benchmarks are used to assess the sustainability of activities and land uses?

Guidance documents will be prepared to support implementation of the Official Plan.

Policy 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.

This policy refers to the ecological systems outlined in the preamble of Section 2.3, i.e. underground aquifers, rivers, streams, ponds, wetlands and lakes.

Policy 2.3.11 - This policy should identify who is responsible for the review and approval of community water management plans

Draft June policy 2.3.11 (Revised December policy 2.3.13), now reads:

To require the preparation of comprehensive master environmental servicing plans as part of secondary plans to protect and enhance the natural hydrologic

function of water systems. Such plans will emphasize water conservation and reuse, and will incorporate innovative technologies with a goal that water balance and hydrologic functions will be maintained.

Local municipalities will review these plans in partnership with conservation authorities and the Region. Further, a guidance document will be prepared to assist in implementation of the OP policies.

Water management plan terminology has been changed to comprehensive master environmental servicing plan. A guidance document will be prepared to assist in implementation of the OP policies.

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.

Draft June policy 2.2.22 (Revised December policy 2.3.21) states "That *development* and *site alteration* are generally prohibited within defined portions of the floodplain, subject to conservation authority regulations."

Policy 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.

This policy states that it is the policy of Council that the Region work with local municipalities etc, rather than directing our partners to do this. In addition, several policies are already contained in the plan to support this, including: Draft June policy 2.2.24 (Revised December policy 2.3.27) "To work with local municipalities and conservation authorities to prepare for climate change impacts by ensuring public health and safety, infrastructure security, emergency services, and that evacuation routes are maintained during flood events." Draft policy 3.2.2 "To prepare a climate change adaptation

action plan in keeping with the York Region Sustainability Strategy: Towards a Sustainable Region.”
Draft policy 3.2.7 “To work with partners such as the GTA Clean Air Council to conduct research, develop toolkits and share information on air quality and climate change impacts.”
New policy 3.2.9 “To work with other levels of government, agencies, and stakeholders to identify the links between climate change, community planning and public health.”
Draft 2009 policy 3.2.9 (Revised policy 3.2.10)
“To work with other levels of government, agencies and stakeholders to develop climate change adaptation measures that address such issues as urban heat island effect, infrastructure resiliency, emergency preparedness, vector-borne diseases, and extreme-weather event responses.”

Watershed Planning

Policy 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.

Recommendation: The goals and objectives of watershed plans shall be supported through the implementation of this Plan and local Official Plans.

Stormwater Management

Policy 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.

Air Quality and Climate Change

Agreed. Draft June policy 2.3.27 (Revised December policy 2.3.32) has been revised as requested.

Water management plan terminology has been changed to comprehensive master environmental servicing plan. A guidance document will be prepared to assist in implementation of the OP policies.

Policy 3.2.5 - This policy should identify who would be responsible for the health, environmental and cumulative air quality impact studies noted.

The policy states that these studies will be required for development with significant known or potential air emissions, therefore the developer will be responsible, further, MOE legislation and guidelines require these studies.

Policy 3.2.6 – Suggested wording: "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"

Policy wording has not been changed.

"Climate Change" is mentioned in a number of locations, please elaborate or explain what strategies are anticipated

Several policies are already contained in the plan to elaborate on this, including:

Draft June policy 2.3.24 (Revised December policy 2.3.27)

"To work with local municipalities and conservation authorities to prepare for climate change impacts by ensuring public health and safety, infrastructure security, emergency services, and that evacuation routes are maintained during flood events."

Policy 3.2.2 "To prepare a climate change adaptation action plan in keeping with the York Region Sustainability Strategy: Towards a Sustainable Region."

Policy 3.2.7 "To work with partners such as the GTA Clean Air Council to conduct research, develop toolkits and share information on air quality and climate change impacts."

New policy 3.2.9 "To work with other levels of government, agencies, and stakeholders to identify the links between climate change, community planning and public health."

Draft June policy 3.2.10 (Revised December policy 3.2.11)

"To work with other levels of government, agencies and stakeholders to develop climate change adaptation measures that address such issues as urban heat island effect,

infrastructure resiliency, emergency preparedness, vector-borne diseases, and extreme-weather event responses.”

Human Services

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.

Fire services and safety is a local responsibility however, the Region has worked with emergency services in a number of ways:

Draft June policy 2.3.24 (Revised December policy 2.3.27)

“To work with local municipalities and conservation authorities to prepare for climate change impacts by ensuring public health and safety, infrastructure security, emergency services, and that evacuation routes are maintained during flood events.”

Draft June policy 2.4.25 (Revised December policy 2.3.28)

“That emergency management plans be updated regularly and reflect disaster response best practices for severe weather events, including flooding.”

Draft June policy 3.2.10 (Revised December policy 3.2.11)

“To work with other levels of government, agencies and stakeholders to develop climate change adaptation measures that address such issues as urban heat island effect, infrastructure resiliency, emergency preparedness, vector-borne diseases, and extreme-weather event responses.”

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?

The implementation guidelines for Regional Centres and Corridors will address the issue of planning for human services in those locations.

Cultural Heritage

Section 3.4 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

Section 3.4 simply begins the story of York Region’s cultural heritage 11,000 years ago with the aboriginal hunting bands. This section lists some of the examples of cultural heritage; however, the policies fully support recognition and celebration of all the Region’s cultural heritage aspects.

Draft June policy 3.4.12 (Revised December policy 3.4.13) recognizes the cultural heritage of new Canadians:

To recognize and celebrate the rich cultural heritage of new Canadians and the Region’s ethnic and cultural groups.

Policy 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.

Policy 3.4.1 has been changed to:

To encourage local municipalities to compile and maintain a register of significant cultural heritage resources, and other significant heritage resources, in consultation with heritage experts, local heritage committees, and other levels of government.

Recommendations: 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.

Policy 3.4.2 - These properties should be conserved in such a way that their heritage values, attributes and integrity are retained.

Recommendation: To ensure that cultural heritage resources under the Region’s ownership are conserved in such a way that their heritage values, attributes and integrity are retained.

Policy 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.

Recommendation: 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.

Reference should be made to the key mechanism or tool that is used to conserve heritage resources.

New Policy Recommendation: 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.

Policy 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.

Recommendation: To promote heritage awareness through education, interpretation and communication opportunities.

The term generally refers to the wise use of cultural heritage and archaeological resources in such a way that their heritage values, attributes and integrity are retained.
No definition added.

This is best determined by the local municipality.

Policy 3.4.4 has been revised to read:
To promote heritage awareness and support local municipal efforts to establish heritage conservation districts.

Region should participate in financial assistance programs such as the heritage tax reduction program operated at the local municipal level.

New Policy Recommendation: To support and participate in financial assistance programs that help conserve cultural heritage resources, where feasible.

The Region has previously investigated implementing such a tax program (Report No. 6 of the Finance and Administration Committee, March 3, 2004, and Report No. 6, clause 3 of the Finance and Administration Committee, Regional Council Meeting of June 23, 2005) and elected at that time not to participate. Local municipalities have the choice to provide rebates of the upper-tier portion to eligible property owners, however, at the time of the above report, local municipalities involved in this program elected not to provide relief of the Regional portion.

Policy 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.

This is an important consideration in the Region's strategic plans, operations, etc. Policy has been revised as requested.

Recommendation: 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.

Policy 3.4.9 - Reference heritage conservation districts in addition to core historic areas. Also the access and parking should complement the cultural heritage landscape.

The intent is that access is provided to conservation districts as well.

Recommendation: 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.

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.

Recommendation: should add 'including those places and events that are significant to residents and communities'

Housing

Policy 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.

Policies 3.5.6 and 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.

Local municipalities are encouraged to identify and protect local cultural heritage in more detail as they see fit.

Affordability is defined in the definitions section of the Plan. The definition is consistent with the PPS and the Growth Plan. Regional Staff understand that there are implementation questions with respect to the affordable housing policies. York Region will be conducting a housing needs study and updating the housing supply strategy. York Region will work closely with the local municipalities and the development industry on coming up with workable implementation approaches.

Implementation of the affordable housing targets will be examined in detail with the updated Housing Requirements Study and housing supply strategy. These policies are to be formulated on a local municipal basis.

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> .	This policy has been revised to “develop” an implementation framework rather than “work towards” an implementation framework.
Policy 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	Policy has been reworded as suggested.
Recommendation: “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.”	
Policy 3.5.14 - Special Needs Housing is defined and should be in italics.	Term has been italicized.
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.	This will be considered as part of the housing requirements study, housing supply strategy and overall implementation framework.
Policy 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.	The policy referring to second suites has been revised to encourage, rather than require, local municipalities to permit second suites.
New Policy Recommendation: “Require local Zoning By-laws to	This will be considered as part of the housing requirements

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"

study, housing supply strategy and overall implementation framework.

Policy 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'.

Policy has been reworded to include the caveat "unless need is determined through a municipal comprehensive review."

Policy 5.4.6.e) - The wording is awkward ... we suggest similar wording to 3.5.7 and suggest eliminating references to tenure and intrinsically affordable units.

Policy 5.4.6.e has been reworded to read: "a minimum requirement that 35% of new housing units be *affordable*, offering a range of compact housing forms and tenures, and intrinsically *affordable* units for low and moderate income households"

Recommendation: 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.

Policies 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?

Regional Staff understand that there are implementation questions with respect to the affordable housing policies. York Region will update the Region's Housing Requirements Study and work closely with the local municipalities and the development industry on coming up with workable implementation approaches.

There may be some overlap in the policies. Policy 5.4.12 addresses the implementation guidelines for *regional centres and corridors*, in which affordable housing is a key component. Revised policies 3.5.9 and 3.5.10 deal with an overall region wide implementation framework for

affordable housing and innovative financial arrangements. Policy 5.4.10 addresses potential strategies at the local level.

Policy 5.4.15 b) - How is social housing defined?

Social Housing is not defined in the ROP at this time. Social housing refers to housing that is publicly subsidized.

Economic Vitality – City Building

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.

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'.

Agreed. These elements are included in the requirements for secondary plans in Regional Centres in policy 5.4.6.

Employment Lands

What is employment? A definition should be included to define 'employment'.

The PPS and the Growth Plan define employment area as *"areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices and associated retail and ancillary facilities."*

Draft June policy 4.3.12 (Revised December policy 4.3.6) clarifies employment uses within regional employment lands: That the conversion of employment lands to non-employment land uses is not permitted. For the purposes of this policy:

- a. employment lands are lands that are designated for employment uses including land designated as industrial and business park in local official plans; and,

- b. uses not permitted on employment lands include residential, *major retail* and non *ancillary* uses.

The ROP defines Major Retail as including retail big box stores and shopping centres.

Policy 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 all 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 the planning period to 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.

Three new policies have been added or revised to the Plan that clarify employment lands and strategic employment lands.

Policy 4.3.2;

To protect all employment lands identified in local municipal official plans. These lands are strategic and vital to the Regional economy and are to be protected for employment land uses.

Policy 4.3.3;

To require local municipalities to designate and protect employment lands in local municipal official plans.

and Draft June policy 4.3.10 (Revised December policy 4.3.4);

To protect strategic employment lands, as identified in Figure 2, including lands beyond the planning horizon of this Plan. Strategic employment lands are identified based on their proximity to existing or planned 400-series highways. Strategic employment lands should be identified and protected in local municipal official plans.

The figure 2 circles for Markham have not been removed.

Policy 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.

Draft June policy 4.3.12 (Revised December policy 4.3.6) clarifies employment uses within regional employment lands: That the conversion of employment lands to non-employment land uses is not permitted. For the purposes of this policy:

- a. employment lands are lands that are designated for employment uses including land designated as industrial and business park in local official plans; and,
- b. uses not permitted on employment lands include residential, *major retail* and non *ancillary uses*.

The ROP defines Major Retail as including retail big box stores, retail warehouses and shopping centres.

See above comment

The ROP defines Ancillary Uses as "Small scale retail and commercial uses that primarily serve the business functions on employment lands."

Policy 4.3.15 and 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.

Retail

Policies 4.4.5 – 4.4.8 - The significance of the policies addressing

Major Retail definition has been added to "include retail big

'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 Recommendation: "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"

box stores, retail warehouses and shopping centres."

Local municipalities are required to define major retail uses within the context of the commercial hierarchy as per policy 4.4.5.

New policy 4.3.12 has been added to clarify uses on local corridors and other major roads within/adjacent to employment areas:

That local municipalities include official plan and secondary plan policies and zoning provisions to exclude land uses other than employment and ancillary uses on Local Corridors and other major roads within and/or adjacent to employment lands.

Regional Plan policies encourage retail within community lands. The Regional land budget included a consideration for major retail. Local municipalities will plan for retail, and York Region will be conducting a study on the Region's retail

sector.

The Region defines Major Retail to "includes retail big box stores, retail warehouses and shopping centres". Major Retail is permitted and encouraged to locate in community lands.

Appropriate locations for major retail will be decided by the local municipality.

The details on how a full cost accounting approach is to be determined will be addressed during implementation.

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-

Financial Management

Policy 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.

Policy 4-5.7 states it is the policy of Council:

To co-ordinate the York Region 10-Year Capital Plan with the phasing policies in Section 5.1 of this Plan.

The detailed phasing policies 5.1.6 to 5.1.9 in chapter 5 attempt to address the alignment of capital expenditures to assessment revenues.

Policy 5.1.6:

To require local municipalities to develop a phasing plan for *new community areas* that is co-ordinated with the following Regional plans and policies:

- a. the new *community areas* criteria in Section 5.6 of this Plan;

related assessment revenues.

- b. the fiscal policies in Section 4.5 of this Plan;
- c. the York Region 10-Year Capital Plan;
- d. the York Region Water and Wastewater Master Plan; and,
- e. the York Region Transportation Master Plan.

Policy 5.1.7:

To require that local official plans, master plans, capital plans and secondary plans be consistent with phasing plans prepared in accordance with policy 5.1.6.b through 5.1.6.e.

Revised Policy 5.1.8:

To require, within each local municipality, that a phase of new *community* area development is substantially complete (i.e., generally 75% of residential land area built) before a subsequent phase may be registered, to ensure the orderly development of land.

Policy 5.1.9:

To require local municipalities to prepare detailed sequencing plans within each secondary plan that are supported by water, wastewater, and transportation infrastructure, and the provision of human services.

Forecasting and Phasing Growth

Policy 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

Policy 5.1.4 has been revised to read: "That local official plans shall not designate more than a 20-year supply of land for *development*." The addition of intensification and redevelopment to this policy would in fact support a supply that exceeds 2031 potential.

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.

The ROP include specific policies to assist the Town with development permissions for intensification and redevelopment. They include 5.1.5 and Sections 5.3 Intensification and Section 5.4 Regional Centres and Corridors.

Policy 5.3.3.g has been revised to state:

That local municipalities shall complete and adopt their own *intensification* strategies based on the York Region 2031 Intensification Strategy and on the Region's Intensification Guide. The local municipal *intensification* strategies, developed in co-operation with the Region, shall:

- g) identify implementation policies and strategies to prioritize, phase in and achieve local municipal intensification targets.

Sustainable Cities/Communities

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.

The Region acknowledges that the current policies in the ROP will not result in zero carbon and zero waste communities. However, this is the ultimate goal and the Region is taking a series of steps to achieve this. The Region will continue to implement and update its sustainable building policies over the time horizon of this Plan.

New Policy Recommendation: consider a policy on encouraging green roofs and bird friendly development

New policy 5.2.25 states that all new development be encouraged to reduce urban heat island effect which include green roofs. Markham's official plan can provide more specificity including requirements for bird friendly development.

Beyond accommodating traffic movements, the demands on

Policy 5.2.3 and 5.2.4 - Talk about prioritizing walkability and cycling but the Region's Great Streets document seems to be automobile-centric.

Regional streets are changing in that they also need to address multiple roles related to other users including transit riders, cyclists, and pedestrians. Regional streets are also an integral element in promoting high quality urban design, serving as entryways to communities and encouraging the development of pedestrian-friendly and transit-oriented neighbourhoods.

Draft June policy 7.2.63 (Revised December policy 7.2.62) states that the York Region's Towards Great Regional Streets study will be updated and implemented. This update will further reflect the Region's priority on walking, cycling and transit.

Policy 5.2.8 a) Talks about mobility when it should be talking about access and connectivity.

Agreed. Policy 5.2.8.a) has been revised to read: "provides pedestrian scale, safety, comfort, accessibility and connectivity." Policy 5.2.8c) has been revised to read: "promotes sustainable and attractive buildings that minimize energy use".

New Policy Recommendation:

- o should add a point that adds reference to minimizing energy use.
- o add "public realm spaces that reflect and support good urban design and public art".

The value of promoting public art, good urban design and overall sense of place within the Region's communities is referenced in a number of sections throughout the Plan, specifically in Chapters 4 and 5.

Policy 5.2.9 - Eludes to but does not talk about vertical integration of different land uses.

The intent of this policy is to focus on the need for a compact and mixed-used form in the Region's urban communities. Vertical integration of different land uses would be consistent with this policy.

Policy 5.2.10 – Should add a point to include 'underground parking to minimize stormwater runoff and heat islands where appropriate'.

Policy 5.4.h states that secondary plans in the Regional Centres and Corridors should reduce/mitigate the effects of urban heat island.

New Policy Recommendation: should add a policy to require that surface parking areas should be designed to support redevelopment and retrofitting.

Policy 5.4.8.d states that secondary plans in the Regional Centres and Corridors will incorporate parking management policies that include structured/underground parking.

Agreed. Policy 5.2.10.e has been added to read: “the design of surface parking to support redevelopment and retrofitting...”

Policy 5.2.16 - Retrofitting for water efficiency in existing development should be discussed to relieve the strain on existing/aging infrastructure.

Agreed. New policies in section 5.2 have been added to require new buildings to have higher levels of water efficiency, and existing building retrofits for higher water efficiency. In addition, policies 7.1.18 - 23 include a number of policies related to water conservation and efficiency to maximize the effectiveness of existing infrastructure.

Policy 5.2.26

New Policy Recommendation: 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.

Revised policy 8.2.3 under section 8.2 Measuring and Monitoring Success, includes the following:

To develop, in co-operation with local municipalities, common measuring and reporting tools to monitor progress towards targets established in this Plan, including:

- a. a minimum of 40% of all residential development will occur within the built-up area as defined by the Province's Built Boundary in Places to Grow: Growth Plan for the Greater Golden Horseshoe, by 2015 and each year thereafter;
- b. an average minimum density that is not less than 50 residents and jobs per hectare in the *developable area* within the York Region *designated greenfield area*;

- c. a minimum 25% new *affordable* housing units across the Region;
- d. a minimum density of 2.5 *floor space index* per development block in the Regional Centres;
- e. a minimum density of 3.5 *floor space index* per development block at, and adjacent to, the Vaughan Metropolitan Centre Station on the Spadina Subway Extension, and the Langstaff/Longbridge and Richmond Hill Centre Stations on the Yonge Subway Extension;
- f. energy and water efficiency standards and other sustainable building policies in this Plan; and,
- g. a minimum woodland cover of 25% of the Region's total land area.

New Policy Recommendation: 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.

Policy 5.4.6 contains detailed criteria for development and requires comprehensive secondary plans for regional centres and corridors.

Policy 5.4.7 has been added:

To encourage local municipalities to re-examine the policies and design of existing secondary plans within the Regional Centres and Corridors to meet the requirements of policy 5.4.6 in this Plan.

New Policy Recommendation: Should add a point that requires every residence within urban boundaries of the region be within 500m of a park or passive open space.

Draft June policy 5.6.18 (Revised December policy 5.6.15) provides this requirement for all new community areas.

LEED and Sustainable Buildings

Policy 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.

Policy 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.

Policy 5.2.17, 5.4.9. and 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.

Policy 5.2.19 - Should add wording regarding LEED ND. Recommendation: Add 'and to encourage LEED ND once approved for use in Canada.' to the end of this section.

Policy 5.2.20 - What tools do we have to encourage retrofitting

Policies requiring LEED have been revised with the following:

- Requirements for minimum energy and water efficiency standards in all new buildings;
- Encourage higher energy and water efficiency standards in new buildings;
- Encourage LEED through incentive programs;
- Encourage using environmentally preferable products;
- Provide assistance in the preparation of building owner/operator education materials;
- Encourage On-Site Renewable Energy, District Energy;
- Encourage enhanced Indoor Air
- Require design of high density for 3 stream waste collection and require minimum diversion for construction waste management
- Encourage water efficient landscaping, require rain water collection systems (rain barrels)

These policies have been incorporated into one new subsection of the Plan which is applicable across the Region. This new organization minimizes repetition throughout the Plan.

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.

Policy 5.2.21 - Should consider thinking bigger to take advantage of opportunities of the Green Energy Act - our Sustainability Office suggests 25%.

Policies with respect to on-site renewables have been changed to reflect this comment.

Policy 5.2.25 and 5.4.6h) - The goal should be to gain trees.

Recommendation: Everytime it is mentioned "greening to provide shade," we should say 'planting climax tree species'

Markham's official plan can provide this additional level of detail to meet Markham's priorities in greening.

Intensification

Should there not be a policy addressing the Provincial Accessibility Standards?

As the Provincial AODA regulations are finalized, the Region will monitor the roll-out of the legislation and amend the ROP as required.

Policy 5.3.7 - open spaces should also provide opportunities for community gardens.

Agreed. Policy 5.3.7.d has been added to read "opportunities for community gardening..."

Recommendation: add 'cultural spaces that reflect changing demographics and public art'; And add 'Transit buildings and shelters that incorporate public art'

The Markham Official Plan may add additional details on the appropriate type of public art and how it is distributed throughout the Town.

Policy 5.3.11 - 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

Agreed. There are many sections in the ROP that encourage the location of human services in proximity to transit, specifically in the Regional Centres and Corridors. Policy 5.3.11 is one such example. Other policies include: 5.4.6.p, 3.3.3, and

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.

revised 3.5.14.

Regional Centres and Corridors

Policy 5.4.6 j) and 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. These sections highlight public realm but these policy ideas need to be re-iterated in each section or they will not be implemented.

Agreed. Policy 5.4.6.k has been revised to include major Regional and local municipal buildings. Markham's official plan can also provide further details to further address public art in the private and public sectors.

Policy 5.4.6 n) What does "weather-protected system or pedestrian and cycling paths and facilities" mean? Are we covering every trail and sidewalk?

Through the secondary plan process, local municipalities in collaboration with the Region, will provide further details on which trails/pathways are to be covered based on the degree of exposure to winter/summer conditions. These details will also identify the appropriate type of weather protection such as underground tunnels, and surface covers including tree canopy. The intention of this policy is to prioritize and promote pedestrian activity.

Policy 5.4.8 - Should note that on-street parking is permitted.

Policy 5.2.10 has been amended to reflect this comment.

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:

The intent of Policy 5.4.15 is to provide community benefits in regional centres and corridors to the benefit of regional residents. The Region will work with the local municipalities in making sure appropriate benefits are considered.

Recommendations - "Work with local municipalities to enact Section 37 OP and Zoning Provisions as they relate to the Regional community benefits listed."

5.4.15 c) - 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".

5.4.20g)

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"

New Policy Recommendation: Should add a policy that ensures sequencing of local retail development with residential development to ensure retail is economically viable.

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.

Recommendation: "for only lands in Regional Centres that have the potential for a high mix of residential and employment density

Markham's official plan can provide this additional specificity to define what a fine grain is in Markham.

Policy 5.4.20.g has been changed to "a long-term resident-to-employee long-term target ratio of 1:1"

The Region agrees that a target of one job for each resident is aggressive (i.e. 1:1 ratio). This target is aimed at the long term full potential of Regional Centres. Over time the changing nature of our economy, cost of energy and lifestyle choices may make this target more achievable.

like subway stations or mobility hubs"

Policy 5.4.22 - How is an urban growth centre defined in this document?

"Urban Growth Centres" are consistent with the Provincial definition in Places to Grow.

Policy 5.4.23 & 5.4.33 - How is 'at, and adjacent to' (subway station) defined?

'At, and adjacent to' refers to a development block that is touching or continuously adjacent to the station.

Policy 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.

Map 1 has been revised to show Yonge Street, south of Highway 7 as both a Regional Corridor and Subway Extension.

Policy 5.4.33c) what does this "appropriate floor space index" mean?

This wording allows for the local municipalities to define the appropriate floor space index for key development areas other than those listed in 5.4.33.a & 5.4.33.b.

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 so new centres may emerge as we become "more local." We do not talk about emerging main streets anywhere.

Policies indicate that local centres and corridors have a role to play in achieving the Region's intensification objectives. All local centres and corridors are to be identified and designated in local official plans and are subject to detailed criteria within secondary plans.

New Communities

Policy 5.6.10 - The Region should include 'solar ready' and 'component green roof' in this wording.

This policy has been moved to a new sub-section in 5.2 "Sustainable Buildings" and has been worded as follows:

"That development shall be designed to maximize solar gains and be constructed in a manner that facilitates future solar installations (i.e. solar ready)".

A sidebar has also been added to outline what "solar ready" includes.

Policy 5.6.14 - Water Management Plans. Who prepares? Who approves?

Policy 5.6.1 states "That local municipalities, in consultation with York Region, prepare a comprehensive secondary plan for *new community areas* that meets or exceeds the policies of this section of this Plan. The secondary plan preparation should include an innovative approach that involves a multidisciplinary team assembled by the local municipality in order to ensure an integrated and sustainable approach to the planning, design and approval of the secondary plan."

The onus is on the local municipality to oversee the preparation of the secondary plan including comprehensive master environmental servicing plans.

Policies 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.

As above.

Policy 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

Local natural heritage systems are included in the Regional Greenlands System, and therefore addressed by this policy. The local plan can also provide more specificity with respect to implementation of local natural heritage system requirements.

and local natural heritage system to ensure local desire to implement Greenway System.

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.

Agricultural and Rural Areas

Section 6.3 - 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.

The side bar on page 70 should list ALL farmers markets - some are missing from this list.

New Policy Recommendation: "Local municipalities will (or may) further refine the agricultural and rural area in local official plans". This suggested policy is necessary as the agricultural and rural area identified by the Region includes non-agricultural land use designation.

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

The preamble has been changed to reflect this comment.

The Agricultural and Rural designations are not overlays in the Regional Plan. Hamlets and Rural Residential developments and the Regional Greenlands system are part of the Agricultural and Rural fabric. In as much as additional estate residential development is no longer permitted in the Region, the existing developments do not provide a conflict with the designations nor policies.

Completed.

Agreed, a new policy 6.1.4 has been added as follows:

That refinements to either the Agricultural Area or Rural Area designations, shown on Map 8, are not permitted unless undertaken through a municipal comprehensive review or the provincial review of the Greenbelt Plan in 2015.

Policy 6.3.12 has been added which states:
That Urban Area expansions justified through the Region's municipal comprehensive review and land budget shall not require an agricultural justification report.

community area.

Conversion of lands not included in the Region's municipal comprehensive review are not permitted therefore no policy is required.

Local Food section has been changed to "Local Agriculture" to reflect the range of food sources and agricultural operations in a local context.

Policy 6.3.14 - It is suggested that the Region add "and sustainable" whenever it mentions Local Food -- to read "Local and Sustainable Food".

Recommendation: add "and sustainable" whenever it mentions Local Food -- to read "Local and Sustainable Food".

Policy 6.1.5 has been added as follows:

That lands designated as Agricultural Area, Rural Area or Urban Area in this Plan that are also part of the Natural Heritage System in the Greenbelt Plan are subject to the Regional Greenlands System policies of Section 2.1 of this Plan, and are intended to function as part of the Regional Greenlands System in the long-term.

New Policy Recommendation: 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 Recommendation - "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."

Policy 6.1.9 has been added as follows:

That the Rouge Park connecting Lake Ontario to the Oak Ridges Moraine in eastern Markham, Whitchurch-Stouffville, and Richmond Hill is contained within the Greenbelt Plan and the Regional Greenlands System. Within the Rouge Park, land uses shall be permitted in accordance with the Greenbelt Plan and the Rouge North Management Plan.

There should be a definition and goal related to 'food security'.

"Food security" is not specifically mentioned in the regional Plan, partly because there are so many definitions surrounding the concept.

Mapping Recommendation: 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.

Servicing our Population

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.

There are no policies in the Regional Plan relating to the Federal lands. Showing on the Maps in the Plan would therefore not provide value added. The municipal official plan may wish to show these lands.

Forecasts within Table 1 of the Plan and the detailed traffic zone information are consistent.

Section 7.1 - With reduction in demand for services, will the Region revise its design standards?

It is not clear what design standards the Town is referring to, however, the Pedestrian and Cycling Master Plan, Transportation Master Plan update and the Water and Wastewater Master Plan and Transit plans all recommend design standards that support a reduction in the demand for services.

Section 7.1 New Policy Recommendation - To reduce leakage and improve water infrastructure efficiency through implementation of District Management Areas, in co-operation with local municipalities.

York Region's Water Efficiency Master Plan is currently being implemented and includes actions to reduce leakage and improve water infrastructure efficiency in cooperation with local municipalities.

Section 7.2 New Policy Recommendation - 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

There are a number of policies in Chapter 5 that promote urban design and streetscapes that promote walkability and urban context both in centres and corridors, and in other urban areas and new communities.

Section 7.2 New Policy Recommendation - 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.

York Region's 2009-2018 Capital Plan funding for roads and transit is:
\$1.4 billion for roads
\$6.5 billion for transit (rapid and conventional)

Additionally, Draft June policy 7.2.63 (Revised December 2009 7.2.62) commits to update and implement York Region's Towards Great Regional Streets study.

Policy 7.2.25f) - 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.

Policy 7.2.25.e supports creating a system of parking and drop off facilities for commuters. Both Intermodal terminals and end of line stations will provide parking facilities according to demand/need.

Policy 7.2.26 - These should be minimum transit modal split as some centres may be targeting higher transit modal split.

Correct, this is a minimum that we are aiming towards, which is actually considered quite high.

Policy 7.2.31 - Fare integration is one of the major key to increasing transit usage in York Region - move this policy further up to show its importance.

Believe the Town is referring to Policy 7.2.30. Fare integration is one of many key policies in this section. No revisions required.

Policy 7.2.41c) - streets must be within a hospital environment that supports independent, safe, mobility and daily access to nature and community.

Agreed, this policy's intent is reflected in a number of policies in Chapters 3, 5 and 7. For example, policy 3.1.3, "To require high-quality urban design and pedestrian-friendly communities that provide safety, comfort and mobility so that residents can walk to meet their daily needs."

Policy 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 Mackenzie Multi Use Path.

Draft June policy 7.2.42 (Revised December policy 7.2.41) addresses this as well: To implement transit improvements on urban streets as identified on Map 12, which may include transit lanes, *high-occupancy vehicle lanes*, queue jump lanes, bicycle lanes and other transit signal priority needs.

Section 7.2 New Policy Recommendation - Should add a policy to ensure protection for existing neighbourhoods for noise attenuation measures.

Chapter 7 includes policies on noise attenuation near railways and airports. Chapter 3 includes policies separating sensitive uses from 400-series highways.

Section 7.2 New Policy Recommendation - Should add a policy to ensure street widening to be undertaken only after roads are maximized.

The Region's Transportation Master Plan supports the Regional Official Plan by providing further details on anticipated street widenings. Additional studies including cordon counts and the 10 year capital plan complement the TMP on timing of street widenings.

Policy 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?

This policy speaks to new Regional streets. Additional rights-of-way may be secured beyond the first 36 metres.

Policy 7.2.52 - If left as worded, we could still have huge unwalkable blocks.

A number of policies throughout the draft Official Plan speak to design to achieve walkable, active and healthy communities in York Region including:

Recommendation - 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'.

5.2.3. That communities be designed to ensure walkability through interconnected and accessible mobility systems. These systems will give priority to pedestrian movement and transit use, provide pedestrian and cycling facilities, and implement the York Region Pedestrian and Cycling Master Plan.

Revised 5.4.6. That comprehensive secondary plans for Regional Centres and key *development areas* along Regional Corridors be prepared by local municipalities and implemented in co-operation with the Region and related agencies. These secondary plans shall include:

- a. minimum density requirements and targets established by the Region and the Province;
- b. the establishment, implementation and/or continuation of a fine-grained street grid that incorporates sidewalks and bicycle lanes;
- c. an urban built form that is massed, designed and oriented to people, and creates active and attractive streets for all seasons with ground-floor uses such as retail, human and personal services;
- d. a concentration of the most intensive *development* and greatest mix of uses within a reasonable and direct walking distance of rapid transit stations and/or planned subway stations;
- e. a minimum requirement that 35% of new housing units be *affordable*, offering a range of compact housing forms and tenures, and intrinsically *affordable* units for low and moderate income households;
- f. policies that sequence *development* in an orderly way, co-ordinated with the provision of human services, transit and other

infrastructure;

- g. policies to ensure excellence in urban design and sustainable construction methods, including winter design;
- h. requirements to reduce and/or mitigate urban heat island effects, by considering the use of green and white roofs, greening to provide shade and light-coloured surface materials;
- i. policies that establish urban greening targets, which may be achieved through urban forest canopy, green walls, requirements for on-site greening;
- j. provisions for an urban public realm, including passive and active parks and meeting places, such as urban squares, which incorporate art, culture and heritage, and that contribute to a sense of place and clear identity;
- k. policies that encourage the inclusion of public art in all significant private sector developments and that require the dedication of 1% of the capital budget of all major Regional and local municipal buildings to public art;
- l. policies to ensure natural and recreational connections and enhancements to and within local and Regional Greenlands Systems;
- m. policies to require innovative approaches to urban stormwater management, including alternatives to conventional retention ponds, low-impact development, green roofs, and water capture and reuse;
- n. a mobility plan that addresses the criteria in policy 5.6.12 in this Plan with an emphasis on delivering a weather-protected system of

- pedestrian and cycling paths and facilities;
- o. requirements for new school sites to be constructed to an urban standard, including the consideration of alternative site size and design standards, multi-storey buildings and shared facilities; and,
- p. provisions for human services that meet local community and Region-wide needs.

Draft June policy 5.6.12 (Revised December policy 5.6.15).

That mobility plans shall be completed to ensure that:

- a. communities are designed to have interconnected and accessible mobility systems, with a priority on pedestrian movement, and on transit use and access;
- b. communities are designed to include a system of pedestrian and bicycle paths linking the community internally and externally to other areas, and providing access to the transit system;
- c. a transit plan is completed in consultation with York Region Transit, which identifies transit routes and corridors, co-ordinates transit with land use patterns and ensures the early integration of transit into the community;
- d. the distance from a transit stop is generally no more than 500 metres for 90% of the population, and no more than 200 metres for 50% of the population;
- e. all schools and community centres shall be integrated into the community mobility system and provide the ability to walk, cycle, transit and carpool to these locations;
- f. the street network includes continuous collector streets that run both north-south and east-west and/or a grid system of streets linked to the Regional Street network;
- g. *new community areas* are designed to meet the York Region Transit-Oriented Development Guidelines;

Policy 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

This is intended to reinforce the local municipalities' growth management objectives which local municipalities will continue to manage on a site by site basis through their own approval processes and servicing allocation policies.

Policy 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.

Existing estate residential development plans and policies would predate the Regional Plan and provide guidance to existing approvals.

Policy 7.3.24 - The Region is not only minimizing the impact but it must meet or exceed Provincial standards/guidelines

Policies in the Plan are intended to meet or exceed Provincial standards and guidelines which are also supported by the Region's infrastructure master plans.

Policy 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?

The planning and design of infrastructure will consider climate change impacts through mitigation, adaptation and risk management approaches considering things like demand management and energy conservation, resiliency of built infrastructure, emergency and risk management, for climate change impacts like flooding and drought for example. The draft Official Plan policies are supported in the detailed recommendations in the Region's infrastructure Master Plans and Sustainability Strategy.

Policy 7.3.33 - to clarify this policy add "provided that drinking water quality is not deteriorated' before the words ' where permitted by York Region Master Plan and Provincial Plans."

The objective in Section 7.3 To deliver safe, clean drinking water and provide long-term water and wastewater services to York Region's communities, that are safe, well-managed,

and sustainable. This, along with policy 7.3.19, addresses this concern. Policy 7.3.19 reads:

To provide high-quality, safe, and clean drinking water while protecting surface and groundwater resources by:

- a. meeting and exceeding water quality standards defined by the Safe Drinking Water Act;
- b. protecting the drinking water supply through source water protection strategies;
- c. protecting and enhancing the Region's system of lakes, rivers and streams;
- d. ensuring groundwater use sustains the long-term health of aquifers;
- e. maintaining and updating the groundwater monitoring program; and,
- f. identifying source water protection areas.

Section 7.4 - The Region should clarify that Recovery doesn't include incineration.

The MOE only recognizes 3Rs. The 4th R - recovery - is not recognized as a diversion option by the Province.

Section 7.4 - Should include something about zero waste as an objective.

Recommendation - Second paragraph change "....zero waste ideal" to "...zero waste objective."

Regional Council has endorsed Recovery, including energy from waste, as the 4th R, with the full knowledge and specific acknowledgement in their deliberations regarding the MOE's differing position. This was a conscious decision to demonstrate York's leadership in waste management in Ontario.

The Regional Official Plan is a document which is intended to remain in effect for 25 years. To avoid differing definitions from different parties, the objective was stated in more common terms, which are consistent with our vision of zero waste.

Section 7.4.19 - It is suggested that this policy be replaced with "To pursue zero-waste, bio-mass, bio-gas technologies."

Policy 7.4.19 embraces the direction Regional Council has begun to take in the context of the Durham-York project and Dongara's services, as well as leaving the future open to any number of emerging technologies. No revisions required.

Policy 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.

York's position, as reflected in the waste hierarchy and guided by sustainability principles, remains to divert as much waste as possible from landfill. Energy from waste is applied only to residual waste that remains after all other diversion efforts have been maximized, allowing for the diversion of even more waste from landfill.

Implementation

Policy 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?

Agreed. The Regional woodland cover has been added. Energy, water and LEED targets have been revised to reflect the new sustainable building policies: *"energy and water efficiency standards and other sustainable buildings policies in this Plan"*

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.

Policy 8.3.8 - This policy identifies local OP's which are not eligible for exemption. Retail is mentioned but employment is not.

Retail implications having a regional impact are not eligible for exemption. Employment lands are subject to the policies Section 4.

Should also include applications which are not consistent with the

Growth Plan.

Should add 'and Growth Plan' after 'Provincial Policy Statement'.

Both suggestions have been added.

Table 3 - 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.

Policy 6.3.12 has been added which states: That Urban Area expansions justified through the Region's municipal comprehensive review and land budget shall not require an agricultural justification report.

Conversion of lands not included in the Region's municipal comprehensive review are not permitted, therefore no policy is required.

New Policy Recommendation: 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.

The intention of Table 3 and the associated policies is to conform to adopted ROPA 61 – Complete Applications which requires the Region to list all required studies for a Regional Official Plan Amendment. These are consistent with the Planning Act requirements for complete applications.

Markham's Official Plan may consolidate the list of required Regional and Local Municipal studies as per policy 8.3.15: "That all Regional studies required in this Plan be included in local municipal official plan complete applications listings"

Policy 8.4.5 - It might be a bit premature to suggest an employment designation for the redesignation of Greenbelt lands.

This policy was added in consultation with other local municipalities. The 2015 review will only consider the redesignation of lands for employment based on the availability of strategically located employment lands. The Province will ultimately decide on which lands are

redesignated as per the Greenbelt Plan and Act.

Definitions

Affordable - 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?

"Low and Moderate Income Households" is defined in the Provincial Policy Statement. "The lowest 60% of the income distribution for the regional market area" is determined by using 60th percentile income census data by tenure. "Levels of affordability" refers to the need for housing affordable to all residents (i.e. those at the 10th, 20th, 30th, etc. percent of the income distribution for the regional market area."

The ROP definition may be reviewed when the housing requirements study and housing supply strategy are updated.

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.

Alternative Energy Systems is defined as: Sources of energy or energy conversion processes such as co-generation and energy from waste that significantly reduce the amount of harmful emissions to the environment when compared with conventional energy systems.

Markham's Official Plan may add further detail to this definition to meet Town standards/initiatives.

Should add a definition to explain how 'at, and adjacent to,' in sections 5.4.23 and 5.4.33 are defined.

SIGNIFICANT WOODLANDS Should add definition

Definition has been added.

SENSITIVE OR SIGNIFICANT RECHARGE AREAS Should add definition

Agreed, both definitions added.

CONSERVATION OF SIGNIFICANT CULTURAL HERITAGE RESOURCES
Should add definition

The definitions of cultural community and cultural heritage resources have been added.

EMPLOYMENT AREA AND EMPLOYMENT LAND AREAS - add

Employment areas are defined in the PPS and Growth Plan. This is the definition that the Region uses.

KEY DEVELOPMENT AREA - add

Definition has been added.

NET ECOLOGICAL GAIN - add

Changed to Ecological Gain as a sidebar. Any reference has been changed.

SOCIAL HOUSING - add

Definition will be considered when the Housing Requirements Study and Housing Supply Strategy are updated. Currently, please refer to the York Region Housing Directions Study, 2000.

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

Draft June policy 4.3.10 (Revised December policy 4.3.4) has been modified to include a definition of strategic employment lands. The policy has been amended to read as follows:

To protect strategic employment lands, as identified in Figure 2, including lands beyond the planning horizon of this Plan. Strategic employment lands are identified based on their proximity to existing or planned 400-series highways. Strategic employment lands should be identified and protected in local municipal official plans.

MAJOR RETAIL - add

Definition has been added.

Major retail includes retail big box stores, retail warehouses and shopping centres.

REGIONAL LINKAGES - add	This term is better left undefined to allow the Region the flexibility in the application of this policy.
URBAN GROWTH CENTRE - add	Urban Growth Centres are defined as per the Growth Plan.
Maps	Map 1 has been revised.
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.	Draft policy 2.1.3 has been revised to: That the Regional Greenlands System includes regional linkages and will be the focus of enhancement and land securement initiatives to achieve the Greenlands System Vision identified on Map 2 of this Plan.
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 2 has also been amended to move the Greenland System Vision arrows to the Little Rouge Corridor, and other map amendments, as recommended, have been made.
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 3 has been revised.
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	Map 4 has been revised, and waterbodies have been removed from the legend.

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 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 transit ways into the whitebelt lands proposed for urban expansion.

The Map has been revised to show all of the Bob Hunter/Rouge Park/Little Rouge holding.

New Policies 7.3.49 through 51, taken from the Oak Ridges moraine policies on Aquifer Vulnerability from the 1994 Plan, have been added.

When the Region proceeds with Amendment 1 to identify urban expansions early in 2010, then the lands will be deleted from the Agricultural or Rural designation in the same Amendment.

Boundaries for the ORMCP and Greenbelt in Eastern Markham are coincident.

The environmental "designations" sit on top of the Agricultural and Rural designations.
Map 12 illustrates the ROW widths for regional streets.
Policies in Section 7.2 support all modes of transportation including cycling.

Priority transit ways have been identified through the Transportation Master Plan.

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

Agreed, map has been revised as requested.

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.

Figure 2 is an appendix to the Plan, and therefore not part of the Plan. The Region has an interest in protecting employment lands of regional significance and has identified them on Figure 2.

The Region is working closely with the Town of Markham to co-ordinate land budget and urban expansion work.

Regional staff will bring a report to Regional Council which makes recommendations on the definitive Urban Area expansions early in 2010. Specific identification of urban expansion areas will be brought forward in a Regional Amendment to the Plan.

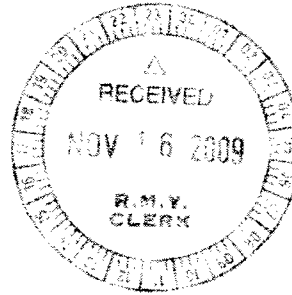
This work will collectively constitute a Region-wide comprehensive review.

#1287767

D05.2009.3.025



October 29, 2009



Received November 16, 2009

Mr. Denis Kelly
Regional Clerk, The Regional Municipality of York
17250 Yonge Street
Newmarket, ON L3Y 6Z1

RE: DRAFT REGIONAL OFFICIAL PLAN (10.17)

Dear Mr. Kelly:

This will confirm that at a meeting held on October 27, 2009, Town of Markham Council adopted the following resolution:

- 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 memorandum dated October 27, 2009 from the Commissioner of Development Services providing information regarding the October 23, 2009 Development Services Committee Workshop be received; and,
- 4) 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,
- 5) 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; and further,
- 6) That Staff be authorized and directed to do all things to give effect to this resolution." (Item 1 of Report No. 63)

If you have any questions, please contact Elisabeth Silva Stewart, Senior Planner at 905-477-7000 ext. 3115.

Yours sincerely,

Kimberley Kateringham
Town Clerk

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Report to: Development Services Committee

October 13, 2009

SUBJECT: Draft York Region Official Plan
PREPARED BY: Policy & Research Division Staff
Planning & Urban Design Department

RECOMMENDATION:

- 1) That the report to Development Services Committee entitled "Draft York Region Official Plan", be received;
- 2) And that the comments outlined in this report and detailed comments attached as "Appendix A" be forwarded to the Region as Markham's preliminary response to the Region's request for input on the draft Regional Official Plan;
- 3) And that further comments be provided to the Region as Markham Council provides further direction with respect to the Town's Growth Management Strategy;
- 4) And that Staff be authorized and directed to do all things to give effect to this resolution.

EXECUTIVE SUMMARY:

On June 17, 2009, the Region of York released a draft York Region Official Plan (ROP) for public review and comment. Staff has reviewed the draft ROP in the context of the Provincial Growth Plan and Markham's Growth Management Strategy and associated background studies currently underway. The draft ROP is the culmination of 3 years work by regional staff and council. There has been extensive public consultation and involvement of municipal staff. The draft ROP represents leading edge policy, grounded in the three pillars of sustainability. Staff commends the Region for their efforts to ensure a consultative and educational process and the resulting comprehensive policy regime contained in the draft ROP.

The comments contained in this report and Appendix are offered only to improve the direction and clarity of the ROP. Technical Staff comments and suggestions are included in Appendix 'A' [attached] to this Report. This report outlines high level comments in the broad theme areas of:

- o Policies
- o Study Requirements, Phasing Mechanisms, and Implementation
- o Definitions and Mapping.

Staff met with Regional Planning staff to discuss and review comments and concerns. Regional staff committed to continue working with staff to address a number of technical

requests. This report also highlights a few matters that Council may wish to specifically review and comment upon.

Committee will recall from the presentation on September 15th by Regional Staff, that the draft ROP contemplates expansion of the current urban area in northern Markham. It is anticipated that the final ROP submitted to Regional Council for adoption (targeted for November 2009) will identify an extended urban area boundary. If, at that time Markham Council has not reached a decision regarding any possible extension of the current urban area, Council may wish to request a deferral of the ROP policies and mapping until it has reached a decision.

PURPOSE:

The purpose of this report is to provide Markham's preliminary comments on the draft York Region Official Plan currently out for public consultation. The Region should be advised that further comments may be provided once Markham Council provides further direction with respect to the Town's Growth Management Strategy.

BACKGROUND:

Since 2005, York Region (the Region) has been proceeding with a growth management undertaking entitled 'Planning for Tomorrow'. Planning for Tomorrow and related studies set the stage for a 'new' York Region Official Plan. Through the Planning for Tomorrow process, and the update of servicing and transportation Master Plans, the Region incorporated an extensive consultation program. The draft ROP also incorporates policies to achieve conformity with the new Provincial planning context which includes the Greenbelt Plan, Source Water Protection, and Places to Grow Plan, the Regional Transportation Plan (The Big Move) prepared by Metrolinx, and the Lake Simcoe Protection Plan.

Provincial legislation requires the Region to conform to and implement the Growth Plan for the Greater Golden Horseshoe, through the new Regional Official Plan. In turn, Markham is also required to conform to both the provincial plan and the new Regional Official Plan through our conformity exercise, leading to a new Markham Official Plan. It should be noted that, the Region is the approval authority for Markham's new Official Plan. Our Official Plan conformity exercise, leading to a new Official Plan will be initiated following a Council decision on a preferred growth option.

On June 17, 2009, the Region released a draft ROP for public review and comment. Regional staff provided a presentation on the draft ROP to Development Services Committee on September 15, 2009. The Region has held public information meetings at various locations across the Region (September 16, 2009 in the Town of Markham), and a Statutory Open House on September 29, 2009, and will be concluding with the Statutory Public Meeting on October 7, 2009.

The Region's staff report dated June 17, 2009, recommends reporting back to Regional Planning and Economic Development Committee on November 4, 2009 with the comments received from the consultation program and any recommended changes to the

draft ROP document at that time. It is anticipated that this timing would enable Regional Council to adopt the draft ROP before year end. The approval authority for the new Regional Official Plan is the Province of Ontario.

Town Staff from the Planning and Urban Design and Engineering Departments and the Office of Sustainability met with Regional Planning staff and discussed the items outlined in this report. Regional Staff continues to work with Town Staff to address a number of technical requests.

OPTIONS/ DISCUSSION:

Specific and detailed comments on the draft ROP are attached in Appendix 'A'. This report outlines the broader themes and comments discussed with the Regional planning staff.

Policies

Environment

The Regional Official Plan confirms that 69% of the total regional land base is protected for agriculture and environment in the Oak Ridges Moraine and the Greenbelt. Future development lands ("white belt") identified in the Provincial Growth Plan represent 4% of the total regional land area. The Region has identified that only 1.6% of the total regional land area will be required for new community development, prior to 2031.

In June 2009, the Town adopted in principle a proposed Greenway System through the Town's Environmental Policy Review and Consolidation Study (EPRC). The Region's proposed Greenlands System is generally consistent with the Town's Greenway System reflecting all the river corridors, woodlots, wetlands and Greenbelt boundary. The Region identifies a 'Greenlands System Vision' through a conceptual arrow on Map 2 which extends through the urban area of Whichchurch-Stouffville through the Federal lands in north Markham and eventually connecting to the Little Rouge Creek corridor – Rouge Park. Recognizing that this 'vision' is conceptual, Staff still feels that the Greenway System vision should extend along the Greenbelt protected corridor of the Little Rouge Creek connecting to Bruce's Mill Conservation Area to take advantage of the natural heritage opportunity rather than through settlement lands and agricultural lands. The Little Rouge Creek corridor in Markham is identified to support the contiguous Rouge Park connection to the Oak Ridges Moraine.

A number of other comments have been provided on the Sustainable Natural Environment policies and are contained in Appendix 'A'. Of particular note, the Region should ensure that the data sources and definitions of the component layers in the Greenlands System are clearly identified so that these layers can be replicated at the local level and understood by landowners and developers. This is particularly important since similar features (woodlands) can be defined differently by involved agencies (Province, TRCA, Town). It is also important that where the Regional Greenlands System is to be delineated to a finer level of detail in support of new development, the policy should also support and acknowledge that the Regional system can be enhanced through a local greenway system, should the local system include additional lands.

Staff recommends the inclusion of additional environmental policies. It would be appropriate to include a specific Rouge Park policy since this park will have an enhanced multi-purpose park function within both the Greenlands and Agricultural System. Town Staff also suggests that a policy could be included to allow new wetlands to be created on public lands to be recognized in the Regional Official Plan without the need for a formal amendment to support the wetlands enhancement initiatives in the Rouge Park.

The recommended policy approach with respect to significant woodlands in Markham is that these features are to be protected. The Region's policy Section (2.2.38.b) provides flexibility for the development and site alteration of significant woodlands in the 'new community areas' (future growth areas). At this time, this policy is not consistent with the recommendations of the Town's Environmental Policy Review and Consolidation Study.

These matters were discussed with Regional Staff, who will be working with Town Staff to address them.

Growth Forecasts, Land Budget and Settlement Area Boundary

The draft ROP incorporates growth forecasts for Markham that have been used as the basis for determining the required land budgets to accommodate growth. Staff has previously reported to the Committee on the forecasts and land budgets. Work towards the development of a growth management strategy for Markham including the Intensification Study, the Housing Stock Analysis, and the Employment Lands Strategy (Phase 1) has confirmed that Markham can meet, and if the market responds, exceed the residential intensification target established by the Region. Second, the work has confirmed that the residential land requirement outside the current settlement area (+/- 600 ha) identified by the Region is valid and should be used to accommodate new housing, ensuring that Markham achieves a long term housing mix consistent with market needs. Third, the work has confirmed that the requirement for additional employment land outside the current settlement area can be reduced (to +/- 300 ha), if the land contingency is excluded and no separate land requirement for major retail development is provided. Finally, the locations for new communities and employment land proposed by the Region are consistent with the Provincial Growth Plan and Markham's completed work and Staff's preferred growth scenario.

The draft ROP incorporates a reduction of approximately 8,000 jobs within Markham over the previous 2031 forecast. Details of the breakdown of the new employment forecast are not yet available. Once the detailed information is available, staff will review the implications for land budget estimates. In light of the minor nature of the overall reduction, and the focus on employment growth within the current settlement area, no significant change in the land budget is anticipated.

Staff is comfortable with the draft ROP's policies relating to growth forecasts and land budget and it is expected that the final draft of the ROP will identify additional lands to be added to the Urban Area on Map 1 (in the general location of the conceptual asterisks shown in the current draft). In the event that the Region does identify a specific new

urban boundary for Markham in the Regional Official Plan, and Council has not reached a decision regarding possible expansion of the urban area, Council will need to consider advising the Region, by resolution, that it has not reached a decision and request a deferral of policies and mapping related to urban expansion in Markham, pending a Town decision.

Employment

Markham's Employment Lands Strategy (Phase 1) Study addresses the employment forecasts to 2031 in the draft ROP. The Strategy 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 ROP 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 ROP to confirm the strategic importance of all employment lands needed to accommodate existing and future employment. Staff supports the Region in conceptually identifying the location of lands to be protected for employment purposes after 2031 to ensure that future employment is strategically located, and that consideration of future employment development can be taken account of during the planning period to 2031.

Additional detailed comments with respect to policy interpretation, clarification requirements, definition requirements, and additional policy suggestions are contained in Appendix A.

Buttonville Airport

The draft ROP policy with respect to the Buttonville Airport is "*That should airport operations at the Toronto Buttonville Municipal Airport cease, the subject lands shall be retained as employment lands.*" Staff concurs with the draft ROP policy and direction relating to the Buttonville Airport. Markham's policy is that the airport lands have an INDUSTRIAL designation in Markham's Official Plan (in addition to a Transportation and Utilities designation for the current airport use) and that:

"..... In the event that the Buttonville Airport ceases to operate, it is expected that the lands ...will be developed for uses consistent with the Business Park Area category of INDUSTRIAL designation"

Consistent with the Town's Official Plan, the Employment Lands Strategy (Phase 1) assumed that if the airport were to cease to operate, the lands would be available for future Business Park employment, and prepared land budget estimates on this basis.

If the Region and the Town were to be requested by the landowner to change the current Official Plan designation, this could only happen in the context of a comprehensive

review by the Town of its employment land requirements and overall policies for land use and development.

Major Retail Uses

The significance of the policies addressing 'Major Retail' in the draft ROP is heightened by the absence of a definition of the term. Staff concurs 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 and development review 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 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.

Other more specific policy suggestions related to Major Retail are contained in Appendix A. Staff has reviewed these matters with Regional staff and will be working with them on a satisfactory resolution.

Sustainable Cities/Communities

The draft ROP was developed using a Sustainability lens and incorporates what is commonly known as Triple Bottom Line objectives to achieve sustainability goals. Several policies in the draft ROP use the LEED® rating system to realize this goal. Staff supports the objectives of these policies and applauds the Region for this bold initiative. We note that LEED® is emerging as one of the more identifiable rating systems within the development industry. It influences the market by distinguishing LEED® certified projects within the market in an effort to "accelerate global adoption of sustainable green building and development practices through the creation and implementation of universally understood and accepted tools and performance criteria." However, the Region (in its September 2009 report) acknowledges that policies dependent upon the LEED® rating systems identified in the draft ROP, in certain circumstances, exceed Ontario Building Code (OBC) requirements. Consequently the ROP recognizes the possible advantages of application of equivalent evaluation systems. In addition to this work, the Region should encourage the Province to improve sustainable building design legislation and requirements through the Ontario Building Code. Markham continues to support the Region's efforts in applying LEED®, or an equivalent evaluation system, and will join efforts to press the Province for appropriate amendments to the OBC.

The Town's Sustainability office also suggests that the draft ROP include policy provisions to recognize the need for wildlife and regional or local trail crossings of arterial roads at appropriate locations that do not compromise good urban design.

Several other sustainability policy items have been identified in Appendix A and have been discussed with Regional staff.

Agricultural and Rural Areas Policies

The policy approach taken in the draft ROP is generally consistent with the direction underway in the Town through the Agricultural Assessment Study. The majority of the agricultural lands in the Town are identified as 'prime' agricultural lands, which has been determined through a recent Regional Land Evaluation Area Review (LEAR) study. A very small pocket of 'rural area' lands are identified in the northwest corner of the Town contiguous with rural lands in Whitchurch-Stouffville. The only major issue identified by staff is clarity and interpretation of the Agricultural and Rural Area designation, policies and mapping. The designation shown on Map 8 does not address other designations such as Hamlets and the Regional Greenlands System. In order to avoid direct conflicts, policies should be included to clarify the interpretation of the boundary or the mapping should be adjusted to reflect other regional designations.

Additional technical and minor comments are provided in Appendix 'A' to this report. Staff has discussed these items with Regional staff and are working together to address the policies.

Affordable Housing

Section 3.5 includes policies that establish targets for new affordable housing units across the Region (minimum 25% region wide and 35% in Regional Centres and Corridors), and distributed within each municipality. The Region's definition of affordable is based on the Provincial Policy Statement definition of affordable, with low and moderate-income households further defined as households with incomes in the lowest 60% of the income distribution for the regional market area. It would be helpful to further define the level of affordability by identifying the percentile range for both low and moderate income households.

Staff supports the provision of affordable housing in the Region and in Markham and the broad objectives contained in the draft ROP. However, application of the affordable housing targets may present some challenges to Markham. Markham land values and the rising cost of construction continue to challenge market affordability for both ground related housing and housing in intensification areas. While the market may be able to provide affordable housing for moderate income households in Markham, provision of housing for lower income households will remain challenging. For low income households, given the location and cost of construction, new affordable housing units will likely continue to be limited to social housing units reliant on funding or tax expenditures from senior levels of government.

Having regard for these challenges in providing market affordable and social housing units, Markham will endeavour to support the Region's objective, from a policy perspective, to promote a mix and range of market responsive housing to meet the needs of our residents and workers. However, in order to implement the Region's affordable

housing policies, the Town will require a commitment from the Region to provide an update to its region wide housing requirements study and housing supply strategy, and to develop a comprehensive and innovative affordable housing implementation and incentives framework. In particular, Markham will be looking to the Region to provide guidance on the implementation of its housing policies and targets, including identifying any additional planning policies, strategic actions or funding mechanisms the Region, the Town and/or other levels of government could employ to encourage the private sector and other stakeholders to develop market affordable and social housing units. This information will assist the Town in developing a new affordable and housing strategy which will identify what policies will need to be included in the Town's growth management strategy and new official plan to enable Markham to contribute its share of the targeted new affordable housing units across York Region.

Secondary Suites

The draft ROP contains policies that 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. In particular, there is a requirement for "as-of-right" secondary suite zoning on a municipal wide basis. Although Markham currently has Official Plan policies permitting second suites, Council has not supported "as-of-right" secondary suite zoning on a municipal wide basis. The recent policy direction of Markham Council (May 2009) is to enforce current Town zoning by-laws prohibiting second suites.

Cultural Heritage Conservation

The Town feels that the draft ROP policies relating to cultural heritage could be stronger. Staff has detailed comments and suggestions regarding the policies in the draft ROP in Appendix A.

The suggested feedback proposes modification to existing wording so as to better clarify current policies and offers a few new policies. The new policies suggested are to identify specific tools provided in the Heritage Act that can be used by local municipalities, and to identify the opportunity for regional partnership in local financial cultural heritage programs.

Town staff has discussed these policy items with Regional staff.

Water, Wastewater and Transportation

Staff has completed a comprehensive review of the Region's Water & Wastewater Master Plan Update, along with the Region's Transportation Master Plan Update while reviewing related policies in the draft ROP. Specific comments on the Master Plan Updates will be forwarded to the Region under separate cover. Staff is generally satisfied that there is consistency with these documents and the Town's emerging Growth Management Strategy and related documents. There will need to be however, some coordination in order to reconcile the differences in the land use projections, used by the Region with those used by the Town for its background studies to support Markham's Growth Management Strategy.

With respect to Transportation policies, Staff has the following major comments:

- It is recognized that road capacity will be limited in Markham and priorities should be given to transit, commercial vehicles, and high occupancy vehicles. Staff does not support the notion in the Master Plan Update of restricting delivery by heavy trucks to certain time of the day as this indirectly implies private vehicles have priority over commercial vehicles.
- The Master Plan Update also identifies a number of commuter parking and carpool lots. Staff feels that these large parking facilities should not be located within high density urban areas and should be relocated further away to the periphery of the urban area and along highway or arterial corridors. This will encourage higher transit use to the transit nodes.
- The current lack of transit fare integration is a major deterrent to transit use between York Region and neighbouring municipalities. A greater emphasis and stronger policies are required in the ROP.
- In order to promote alternative modes of transportation, Staff suggests that an additional policy be included to require Regional staff to work with local municipalities to develop alternative Regional street design parameters to encourage walkability and active transportation in nodes and along corridors. These parameters would include lane width, intersection spacing, daylight triangle dimensions, boulevard widths, amongst others.
- It should be noted that Markham Council has indicated their preference for dedicated bike lanes on Regional roads to be physically separated from cars. As well, staff urge the Region to review a variety of cycling lane/path options and support integration with the local cycling systems.

Climate Change has been identified as an important force of change component that needs to be considered in the draft ROP document. The document has identified the need to mitigate the impacts of climate change. It would be helpful if the Region could elaborate on what protocols or strategies are being considered in the planning and designing of the water and wastewater infrastructure to consider the potential impacts from climate change. Specifically a Strategy for Adapting to Climate Change in Water and Wastewater design standards and criteria needs to be developed.

Staff agrees that the Town and the Region need to coordinate the provision of water and waste water infrastructure for future development. However, the Town seeks clarification around the future implementation of these policies.

Staff has identified a number of technical mapping changes in Appendix A relating to draft ROP Transportation and Transit maps. For example the transit priority roads should be extended on Map 11 into the new communities, and the East Markham Mobility Hub in the Highway 7 and Don Cousens Parkway, Havelock Line, Highway 407 area should be shown as a study area which Markham Council has directed Staff to investigate. Staff has also identified to Regional staff that some of the mid-block crossings shown on Map 12 in Markham are not supported by Markham Council.

With respect to road widening projects, Staff will participate in a project evaluation committee to determine where Regional Arterial road projects can be supported.

Additional specific comments on water, wastewater, transportation and transit policy items are listed in Appendix A. Staff identified these items with Regional staff and will be working together on them.

Study Requirements, Phasing Mechanisms and Implementation

Study Requirements

There are a significant number of plans and studies required in the draft ROP (eg. Mobility Plans, Community Energy Plans, Economic/Fiscal Impact Analysis, etc.). The completion and review of Studies and or Plans will impact on Town resources and processes on a go forward basis.

Several study requirements in the draft ROP need clarification. The Region needs to identify who is responsible to carry out the studies, when the studies need to be done, what the specific trigger or mechanism to require the study is, who is responsible to review the study and/or approve it. Staff believes it would be beneficial and user-friendly to introduce a new table in the draft ROP which summarizes all the studies identified in the Regional Official Plan, at what point in the development approval process they are required, and who reviews and approves them. This would facilitate consistent implementation of the ROP across the municipality. This table could also address consolidated studies where the Region and local municipality require a similar study to reduce duplication.

Appendix 'A' identifies when staff believes clarification is required with specific studies. Town and Regional Staff discussed these issues and the Region committed to working together on a satisfactory solution.

Phasing Mechanisms

The Provincial Policy Statement requires that sufficient land be designated to meet the projected growth 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, and concurrent with new development within designated growth areas. The draft ROP includes such a policy applying to new community areas but does not similarly address phasing in intensification 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.

Additional comments with respect to phasing and or sequencing plans are located in Appendix A.

Financial Management

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.

Staff has brought this to Regional Staff's attention.

Implementation

There are several specific comments and suggestions in the chart in Appendix 'A' which relate to the implementation of the draft ROP. A consistent theme throughout relates to improved clarity, which will in turn facilitate consistent implementation as well as conformity by local municipalities. Staff discussed these with Regional Staff and are working together on addressing the items of concern.

Definitions and Mapping

There is a need for additional definitions and/or more specificity in definitions provided to ensure proper implementation. There are also various specific mapping corrections and clarification items have also been noted in Appendix 'A'. These items have been brought to Regional staff attention and they will be working with Town Staff to address them.

Conclusion

Staff has reviewed the draft ROP in the context and direction of the Provincial Growth Plan and the Town's emerging Growth Management Strategy and associated background studies. Staff is generally supportive of the policies and directions contained in the draft ROP. This report highlights some of the Staff comments and suggestions [included in Appendix 'A' - attached] related to improving clarity of the draft ROP. This report also highlights a few matters that Council may wish to specifically review and comment upon, in particular the urban boundaries which may be identified in the new ROP.

The Staff met with Regional Planning staff to discuss and review comments and concerns. Regional staff committed to continue working with staff to address a number of technical requests.

FINANCIAL CONSIDERATIONS AND TEMPLATE:

Not Applicable.

HUMAN RESOURCES CONSIDERATIONS

Not Applicable.

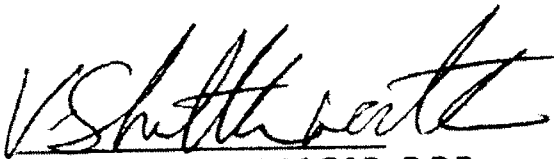
ALIGNMENT WITH STRATEGIC PRIORITIES:

Aligns with Growth Management, Transportation and environment components of the Building Markham's Future Together process.

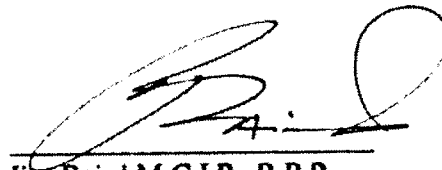
BUSINESS UNITS CONSULTED AND AFFECTED:

Many departments across the Town reviewed the draft ROP and provided comments.

RECOMMENDED BY:



Valerie Shuttleworth M.C.I.P., R.P.P.
Director of Planning and Urban Design



Jim Baird M.C.I.P., R.P.P.
Commissioner of Development Services

ATTACHMENTS:

Appendix 'A' – Specific Staff Comments and Suggestions on the York Region Official Plan

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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.	

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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	

OP Section	Comment	Suggested Wording (if applicable)
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"

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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 all 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.	

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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 an 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.	

OP Section	Comment	Suggested Wording (if applicable)
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'

OP Section	Comment	Suggested Wording (if applicable)
	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'
5.3.11	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.	

OP Section	Comment	Suggested Wording (if applicable)
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.	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.
5.4.6h)	We want trees.	Instead of "greening to provide shade," we should say 'planting climax tree species'.
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 re-iterated 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.	Reward to say "legal working age resident to employee ratio of 1:1"

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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'.	

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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."

OP Section	Comment	Suggested Wording (if applicable)
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 for 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		

OP Section	Comment	Suggested Wording (if applicable)
	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

OP Section	Comment	Suggested Wording (if applicable)
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.	

OP Section	Comment	Suggested Wording (if applicable)
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.	