

Employment Planning

Policy	Description	Comments	Proposed Alternative, if any
2.2.5.5	Municipalities should designate lands within settlement areas located adjacent to major good movement facilities	The intent behind removing the requirement for an employment strategy while at the same time establishing the requirement for establishing multiple density targets for employment areas is not clear.	
2.2.5.6	Clarification that upper- and single-tier municipalities can designate employment areas at any time before the next municipal comprehensive review, including adding existing lower-tier municipal designations.	<p>What is the role of the local municipality?</p> <p>For example, in the case of the City of Burlington, if the Region of Halton were simply to take all employment designated parcels from the in force and effect local Official Plan that are included in the definition of “employment area” it would ignore a series of investigations and analysis related to city designated employment land that have taken place at the local level recommending some redesignations and some employment area additions.</p> <p>This policy would allow the findings of the local exercise that identified lands to be added to the Region of Halton Employment Area overlay. Practically, it is unclear if the Region would consider these requests.</p>	<p>Require Upper-tier municipalities to add lands to the Employment Area identified in the Upper-tier Official Plan in advance of a municipal comprehensive review where:</p> <ul style="list-style-type: none"> a) the lower-tier municipality considered all employment lands and employment area within the municipality; b) the lands are contiguous with any employment area designated within the Upper-tier Official Plan; c) the designations limit permitted uses in accordance with 2.2.5.7.

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2.2.5.7	Modified language that requires municipalities to provide for an appropriate interface to maintain land use compatibility between employment areas and adjacent non-employment areas.	Land use compatibility is a key consideration in all land use planning. The terms “appropriate” and “maintain” are vague. If this policy is truly about land use compatibility the term “adverse effects” should be included. An appropriate interface or edge condition between employment areas and non-employment areas could include <i>major office uses</i> and <i>major retail uses</i> on non-employment areas.	See comment on 2.2.5.8.
2.2.5.8	Modified language that requires municipalities to provide for an appropriate interface to maintain land use compatibility between employment areas and adjacent non-employment areas.	The inclusion of <i>major office uses</i> and <i>major retail uses</i> alongside sensitive uses appears to limit the potential to use these other “non-sensitive uses” as one means of minimizing or mitigating impacts on existing industrial uses.	The development of <i>sensitive land uses</i> will avoid industrial, manufacturing or other uses within the <i>employment area</i> that are particularly vulnerable to encroachment.
2.2.5.10	One-time window to allow municipalities to undertake some conversions between the effective date of the proposed amendments and their next municipal comprehensive review, where appropriate and subject to criteria. Includes requirement to maintain a significant number of jobs on those lands	<p>This policy allows an upper or single-tier municipality to convert lands within existing employment areas.</p> <p>To be effective, this policy should be modified. From a lower-tier municipal perspective it should be noted that, as written, this one-time window for conversions would have no effect.</p> <p>An additional policy should be added to provide clarification to upper-tier municipalities that employment lands that are designated in a lower-tier official plan that are outside of the Upper-tier official plan employment</p>	<p>Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing <i>employment areas</i> may be converted to a designation that permits non-employment uses provided the conversion would:</p> <ul style="list-style-type: none"> a) satisfy the requirements of policy 2.2.5.9 a),d), and e); and b) maintain a significant number of jobs on those lands. <p>For clarity, employment lands designated within a lower-tier Official Plan that are not identified in the Upper-tier Official</p>

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		<p>area are not considered employment conversions.</p> <p>Further, local municipalities will require additional tools to “maintain a significant number of jobs on those lands” such as conditional zoning.</p>	<p>Plan employment areas, are not considered employment conversions.</p> <p>OR</p> <p>In the case of a two -tier municipality, the Upper Tier municipality must consider conversions outside of the extent of the <i>employment area</i> designated within its Official Plan in advance of a municipal comprehensive review where the conversions would:</p> <ul style="list-style-type: none"> a) satisfy the requirements of policy 2.2.5.9 a), d), and e); and b) ensure a significant number of jobs on those lands.
2.2.5.11	Expanded opportunities for major retail in employment areas	<p>This policy would mean that the criteria to permit new or expanded opportunities in employment areas could be developed prior to the municipal comprehensive review.</p> <p>This policy should clarify, if it is the intent, that only an upper- or single-tier Official Plan is permitted to detail these criteria. See note on Transition in the “Other Issues” table.</p>	See notes on Transition in the Other Issues Table.
2.2.5.12	Introduction of Provincially Significant employment zones that must be protected and cannot be converted outside of the municipal comprehensive review.	The Provincially Significant Employment Zones (PSEZ) were developed without local consultation.	Please find attached a detailed map and table which has been prepared to highlight the challenges of the extent of the proposed PSEZ and identify proposed solutions.

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		<p>Additional data, detailed rationale and methodology for the development of the mapping was not provided as part of the consultation.</p> <p>If the intent of the PSEZ is to be a stop gap for municipalities that have not designated employment areas in their upper or single-tier Official Plans the proposal might be an appropriate approach. In that case the PSEZ should not apply if an employment area is designated in an upper-tier Official Plan.</p> <p>Adding another layer of complexity to an already complex area of land use planning will not have the effect of reducing red tape. In fact, if the PSEZ mapping were to proceed as proposed there are several sites that are not currently designated employment lands within the <i>employment area</i> of the City or the Regional Official Plan. These sites would have to go through the Region's municipal comprehensive review in order only to maintain the land use permissions they enjoy today.</p> <p>Without local consultation and confirmation of data the PSEZ will have serious consequences to land owners</p>	<p>Recommendation: Do not implement the PSEZ as proposed.</p>

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		<p>and should not be implemented as proposed.</p> <p>In lieu of imposing the PSEZ as proposed consideration should be given to taking the same approach as proposed through this amendment for the NHS and Agricultural mapping. In that scenario the mapping would not apply until implemented and mapped in the Upper-tier Official Plan.</p> <p>A more detailed discussion about the intent of the mapping is required.</p> <p>An alternative framework could also be considered, like the Gateway Economic Zone which allowed the Upper Tier municipality to work within Provincial expression of expectations (and approval) to meet the same objective.</p>	
2.2.5.13	Establishing multiple employment density targets	Please review 2.2.5.5. The intent of removing the requirement for a strategy and replacing it with the elements of a strategy is unclear.	
2.2.5.14	A new policy that requires municipalities to retain space for a similar number of jobs when redeveloping employment lands.	<p>This policy should be re-worded as it is unclear.</p> <p>Where a site, that is recommended for conversion, currently has 0 jobs or 5 jobs, that existing condition could be used as a means to limit the amount of</p>	<p>Where lands are converted to a designation that permits non-employment uses outside of employment areas, the redevelopment of any employment lands should retain space for a similar number of jobs to remain to be accommodated on site</p>

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		<p>jobs that a municipality could require on a given site. The proposed language adds some clarity and a more objective approach to determining the appropriate amount of space for jobs.</p> <p>In addition, in order to be implementable local municipalities will also require a tool to support the requirement for a certain number of jobs. Conditional zoning is one such tool. Until that tool is available it is not possible to implement this policy.</p>	in proportion to the size and scale of the development proposal.
2.2.5.16	Clarification that within existing office parks, non-employment uses should be limited.	<p>It is unclear if this policy and the associated definition is suggesting that existing <i>office parks</i> are no longer considered employment areas.</p> <p>At a minimum the policy should clarify that non-employment uses do not include residential uses in any case.</p> <p>The policy has not provided sufficient direction.</p>	Please clarify the intent of this policy.
5.2.2.3	Supplementary Direction: This policy states that the province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.	The mapping established in the Upper-tier plan should be interpreted (through Provincial approval) as the approved Provincial mapping without requiring an additional step of “a municipal request”.	The Province shall consider mapping in an Upper-, or Single-tier Official Plan, approved by the Province, as depicting the refined provincially significant employment zones, the agricultural land base mapping or the <i>Natural Heritage System for the Growth Plan</i>

Major Transit Station Areas

Policy	Description	Comments	Proposed Alternative, if any
2.2.4.4	Revised policies that simplify the process and criteria for alternative targets that reflect on-the-ground realities.	This modification is positive and simplifies the approach for considering alternative targets.	None
2.2.4.5	A new policy that allows municipalities to delineate and set density targets for major transit station areas in advance of the municipal comprehensive review, provided the Protected Major Transit Station Area (MTSA) tool under the Planning Act is used.	<p>This modification is positive. The removal of the requirement to balance targets across the same priority transit corridor removes a barrier to moving forward with MTSA delineation. It also relieves the Upper or Single-tier municipality from the exercise of balancing density targets and alternatives along a given priority transit corridor.</p> <p>However, this policy should go further to empower a lower tier municipality to delineate its own MTSA boundaries as a result of a study that responds to the Provincial direction in policy and in guidance documents. This would support unlocking MTSAs and linking the work directly to the local planning exercise that will be the means of meeting the various objectives of the MTSA policies.</p>	Notwithstanding policies 5.2.3.2 b) and 5.2.3.3 c), upper-, and single-, and lower- tier municipalities may delineate the boundaries of major transit stations areas...

Policy	Description	Comments	Proposed Alternative, if any
		The modifications allow for a flexible approach in the case where alternative targets may be proposed.	
Definition: Major Transit Station Area	Clarification that major transit station areas can range from an approximate 500 to 800 metres radius of a transit station.	<p>This is a positive modification that introduces some flexibility into the work of delineating an MTSA. This modification acknowledges that 500 to 800 metres is the approximate distance that a person can walk in 10 minutes. This corresponds to the MTO transit supportive guidelines.</p> <p>It appears that the definition however establishes a maximum of 800 metres. The definition should be revised to clarify that both figures are approximate.</p>	The area including and around any existing or planned higher order station or stop within a <i>settlement area</i> ; or the area including and around a major bus depot in an urban core. Major transit station areas are generally defined as the area radius extending approximately within an approximate 500 to 800 metres radius from of a transit station, representing about a 10-minute walk.

Natural Heritage and Agricultural Systems

Policy	Description	Comments	Proposed Alternative, if any
4.2.1.2	The proposed policy reads: “ <i>Water resource systems</i> will be identified to provide for the long-term protection of <i>key hydrologic features, key hydrologic areas</i> , and their functions.”	Similar to the Natural Heritage System and Agriculture System, broad landscape systems are best implemented through the Municipal Comprehensive Review process, as supported by local planning analysis and public consultation. This should be identified in the policy to provide implementation clarity.	“Water Resource Systems will be identified through a Municipal Comprehensive Review to provide...”

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4.2.2.4	Specification that the provincial mapping of the agricultural land base and the Natural Heritage System for the Growth Plan does not apply until it has been implemented in upper-and single-tier official plans.	This change responds to concerns raised with the Province related to Natural Heritage System and Agricultural System mapping. This allows municipalities to refine the mapping based on more specific local information, analysis and consultation prior to incorporating the mapping into an Official Plan.	This policy direction should also be extended to apply to the Natural Heritage System and Agriculture System mapping within the Greenbelt Plan and Niagara Escarpment Plan Areas.
4.2.2.4	During the period before provincial mapping is implemented in upper-and single-tier official plans, the Growth Plan policies for protecting prime agricultural areas and natural heritage systems and features will apply to municipal mapping.	Support, see above.	This policy direction should also be extended to apply to the Natural Heritage System and Agriculture System mapping within the Greenbelt Plan and Niagara Escarpment Plan Areas.
4.2.2.5	<p>Specification that municipalities can refine and implement provincial mapping in advance of the municipal comprehensive review.</p> <p>New policy that states: "Upper- and single-tier municipalities may refine provincial mapping of the <i>Natural Heritage System for the Growth Plan</i> at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the <i>Natural Heritage System for the Growth</i></p>	Municipalities routinely receive Environmental Impact Assessments (or equivalent) that are used to refine the boundaries of a natural heritage system, based on a detailed site-specific study and analysis. Provided these studies are submitted in support of a Planning Act application (or similar) and approved by the municipality, refinements should be permitted outside of the municipal comprehensive review.	Delete reference to the municipal comprehensive review. Consider instead: "...further refinements may only occur through an approval process under the <i>Planning Act</i> , the <i>Niagara Escarpment Planning and Development Act</i> or the <i>Environmental Assessment Act</i> ."

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	<i>Plan</i> has been implemented in official plans, further refinements may only occur through a <i>municipal comprehensive review</i> .”		
5.2.2.3	Supplementary Direction: This policy states that the province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.	The mapping established in the Upper-tier plan should be interpreted (through Provincial approval of a municipal comprehensive review) as the approved Provincial mapping without requiring an additional step of “a municipal request”.	The Province shall consider mapping in an Upper-, or Single-tier Official Plan, approved by the Province, as depicting the refined provincially significant employment zones, the agricultural land base mapping or the <i>Natural Heritage System for the Growth Plan</i>
Definitions	<p>New definition introduced:</p> <p>Natural Heritage System for the Growth Plan: The natural heritage system mapped and issued by the Province in accordance with this Plan.</p> <p>The original definitions for “Agricultural System” and “Natural Heritage System” have been almost fully retained, yet the first part of the explanation for the Natural Heritage System (The natural heritage system mapped and issued by the Province in accordance with this Plan.) has been pulled out to create a new definition.</p>	The introduction of the unique term “Natural Heritage System for the Growth Plan” is confusing. What is the rationale for this and why was it done for the Natural Heritage System, but not the Agricultural System?	<p>Ensure consistent structure/style changes throughout the document. Retain original definition to Natural Heritage System.</p> <p>Utilize other means of clarifying Provincial vs. Regional vs. Local Natural Heritage System, if this was the rationale for the change. For example, explanatory text included in Official Plans.</p>

Intensification and Density Targets

Policy	Description	Comments	Proposed Alternative, if any
2.2.2.1	<p>Revised policy that establishes different minimum intensification targets for municipalities.</p> <p>Specifically:</p> <ul style="list-style-type: none"> The Cities of Barrie, Brantford, Guelph, Orillia and Peterborough and the Regions of Durham, Halton and Niagara will have a minimum intensification target of 50%. 	<p>The City of Burlington supported the targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change. The target is measured over the entire upper tier municipality. Given that there is little remaining Designated Greenfield land the majority of growth occurs within the built up area and contributes to this target. The City of Burlington is a significant contributor to achieving the intensification target for the Region of Halton.</p> <p>While the minimum intensification target is no longer proposed to increase over time the forecast for people and jobs remain the same. This will impact the rate at which new land is required to be designated for urban purposes.</p>	Retain the targets established in Growth Plan, 2017.
2.2.2.3	Clarification that intensification should be prioritized around strategic growth areas while also being encouraged generally throughout the delineated built up area.	The chief method of developing a strategy to accommodate growth through intensification at an Official Plan level is through the development of an Urban Structure. A reference to Urban Structure should be maintained here.	c) encourage intensification generally to achieve the urban structure as identified by an Upper-, Single- or Lower-tier municipal official plan.

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		<p>The return of language regarding the encouragement of intensification generally throughout the delineated built-up area could also undermine a municipality's urban structure objectives. This should be qualified to require that such intensification is contemplated by the Official Plan of the municipality.</p> <p>The 2017 Growth Plan was more specific about strategic growth tied to urban structures. This modification could be challenging to municipalities who have identified areas where significant changes are not necessary.</p> <p>This language could be detrimental in terms of LPAT appeals that would now have specific language spelling out that development anywhere in the built-up area would be in conformity with the Growth Plan. This could undermine local attempts to reaffirm urban structure and identify established neighbourhood areas that are not expected to change significantly and are not areas which align with local and provincial investments in infrastructure.</p>	

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2.2.2.4	New policies that permit all municipalities to apply for alternative intensification targets	Does not impact the Burlington context.	
2.2.7.2	Revised policy that establishes different minimum designated greenfield area density targets for municipalities. The following targets would take effect at the next municipal comprehensive review and apply to the entire designated greenfield area (with the exception of net outs). Specifically: The Cities of Barrie, Brantford, Guelph, Orillia and Peterborough and the Regions of Durham, Halton and Niagara will have a minimum designated greenfield area density target of 50 residents and jobs per hectare.	<p>The City of Burlington supported the targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change given that there is little remaining Designated Greenfield land.</p> <p>This will impact the rate at which new land is required to be designated for new designated greenfield areas.</p>	
2.2.7.4;2.2.7.5	New policies that permit upper and single tier municipalities to apply for alternative designated greenfield area density targets, with simplified criteria.	<p>The City of Burlington supported the density targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change given that there is little remaining Designated Greenfield land.</p> <p>This will impact the rate at which new land is required to be designated for new designated greenfield areas.</p>	

Settlement Area Boundary & Small Rural Settlements

Policy	Description	Comments	Proposed Alternative, if any
2.2.8.4	Amended to allow for the adjustment of settlement area boundaries outside of a municipal comprehensive review.	The policy should clarify that this may only be initiated by an upper- or single tier municipality.	
2.2.8.3 d)	Amended such that 2.2.8.3 c) and d) are deleted and replaced with “the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and <i>stormwater master plans</i> or equivalent, as appropriate;”. Also amended by deleting “watershed planning or equivalent has demonstrated that”, adding “water, wastewater and stormwater” and deleting “not negatively impact” and replacing it with “be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and”.	The proposed policy deletes references to policies 3.2.6 and 3.2.7, which provide important direction on the type of studies and information needed to support boundary expansions. Watershed and/or subwatershed planning includes water, wastewater and stormwater servicing considerations as identified by the modified policy, however is not limited to these items. Watershed and subwatershed planning is also a critical tool for identifying and refining natural heritage features, areas and systems. These are key considerations when considering a settlement area boundary expansion.	Include reference to Sections 3.2.6 and 3.2.7. Include reference to “watershed planning or equivalent”.
2.2.8.3(f)	Removal of “An agricultural impact assessment will be used to determine the location of the expansion”	What is the rationale for removing this? What is the status of the Draft Agricultural Impact Assessment (AIA) Guidance Document that the Province released in March of 2018?	prime agricultural areas should be avoided where possible. To support protect the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing

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	Replaced with “prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following....”	<p>Provincial AIA guidelines are a key component of supporting implementation of the provincial agricultural system as they provide a consistent minimum framework for agricultural impact evaluation throughout the GGH.</p> <p>The removal of this requirement weakens protection for the agricultural system and introduces risk and subjectivity into the evaluation process.</p>	and mitigating the impact on the Agricultural System, as informed by an agricultural impact assessment and in accordance with the following:

Other Issues

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1.2.2	Legislative Authority: ...a planning matter will conform with this Plan,...	To be consistent with the <i>Planning Act</i> the Growth Plan should be modified to acknowledge that a planning matter will conform or will not conflict with this Plan.	a planning matter will conform, or will not conflict with this Plan...
2.2.1.4 Design	Language changes related to design.	<p>Weakening language around design and urban design guidelines erode a key means of connecting site specific development to the policies of the Growth Plan.</p> <p>The Planning Act identifies matters of Provincial interest that decision makers shall have regard to in Part 1, section 2. Included among them is: the</p>	Retain references to: “Ensure development of high quality” “site design and urban design standards”

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		promotion of built form that (i) is well designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant.	
3.2.1.2	Amended by adding "environmental planning", and by deleting "infrastructure master plans, asset management plans, community energy plans, watershed planning, environmental assessments, and other" and by deleting "where appropriate."	The city supports environmental planning, however the revised policy provides less clarity to implement the policy, and specifically the expected plans and studies that implement and demonstrate environmental planning approaches.	Include reference to the types of studies and plans that may be used to demonstrate compliance with the policy.
Transition	A matter to consider related to transition	Until an Upper-tier municipality has completed its municipal comprehensive review a lower tier Official Plan should be sheltered from conformity to the Growth Plan.	