Pg	Policy number	Comment	Proposed Modifications to LPS17-21 Attachment #1 (pages 1 through 31) (Additions are indicated in <u>blue_underlined</u> text and deletions are indicated in strikethrough text)
2/3 (pdf pgs 5/6)	Preamble / basis	The basis should include discussion of the path to full conformity to Growth Plan 2019.	The contents of this amendment do not compromise the ability of Regional Council to comprehensively and objectivity evaluate the full range of growth concepts associated with the Integrated Growth Management and a subsequent Regional Official Plan Amendment. <u>The decision on a preferred</u> growth concept and the finalization of <u>technicalwill result in one or more ROPAs to</u> implement the findings of the work.
3 (pdf pg 6)	Contents	Edit	legislative requirements under Section 16( <del>15</del> 16) of the Planning Act.
3 (pdf pg 6)	Contents	"Regional Nodesalready recognized". This is an appropriate description of the Regional Nodes.	No change suggested.
3 (pdf pg 6)	Contents	Repeated text.	Employment Area Conversions – Provides an initial set of strategic employment land conversions <del>required for fully implementing</del> <del>local municipal plans and priorities related to</del> <del>growth and intensification</del> which meet the criteria identified by the Region in conformity with the Provincial Growth Plan and which support the Regional Urban Structure, Local Urban Structure, and the implementation of local municipal plans and priorities related to growth and intensification.
	55	The policy as written states that the Regional Structure is accompanied by a growth strategy for Halton based on the distribution of population and employment for the planning horizon year of 2051 as contained in Table 1 and in accordance with the Regional phasing outlined in Map 5 (Regional Phasing Table 2A).	See edit for Table 1 footnote below.

## PL-20-21 Appendix A: ROPA 48 Comments Table

		The growth strategy is still underway; with the distribution of population and employment still to come and with the Regional phasing only to 2031. If the amendment continues to include the population and employment forecast region-wide to 2051 city staff request that the Region consider adding additional language to the Table 1 footnote clarify the application of Growth Plan Policy 5.2.4.3. See proposed edit below.	
6 (pdf pg 9)	55.3	Minimum density targets will be addressed in later sections. Targets for the proportion of residents and jobs to be achieved within specific SGAs will be addressed in later sections	The Regional Structure also sets out targets that apply to certain Strategic Growth Areas as set out in Table 2b. This includes minimum density targets for Urban Growth Centres and Major Transit Station Areas, as well as targets for the proportion of residents and jobs planned to be achieved within specific Strategic Growth Areas, where appropriate.
7 (pdf pg 10)	Table 1	The policy as written states that the Regional Structure is accompanied by a growth strategy for Halton based on the distribution of population and employment for the planning horizon year of 2051 as contained in Table 1 and in accordance with the Regional phasing outlined in Map 5 (Regional Phasing Table 2A). The growth strategy is still underway; with the distribution of population and employment still to come and with the Regional phasing only to 2031. If the amendment continues to include the population and employment forecast region-wide to 2051 city staff request that the Region consider adding additional language to the Table 1 footnote	The population and employment forecasts and plan horizon of 2031 contained in Table 1 will apply to all planning matters in Halton Region, including lower-tier planning matters until Halton Region has Distribution of distributed the 2051 population and employment forecasts to the Local Municipalities, forecasts to be determined through the <i>municipal</i> <i>comprehensive review</i> .

		clarify the application of Growth Plan Policy 5.2.4.3.	
7 (pdf pg 10)	Table 2B	**Note 2 – suggest modifying to make clear that Strategic Growth Areas like Urban Growth Centres and Major Transit Station Areas are more durable elements of the Plan. This could include a reference to policy section number 35. Modification wording not suggested.	<u>*** Target proportion are not policy</u> <u>requirements, rather are considerations in</u> <u>Local Official Plan Amendments.</u>
		***Note 3 - What is the mechanism for addressing modifications to the target proportion of residents and jobs. The policy should at a minimum detail that modifications to the target proportion be allowed through a local process to implement relevant Regional OP policies.	
		Propose modifications that detail that the targets are to be considerations in the development of local OPAs. Suggest adding a note to the table.	
9 (pdf pg 12)	75	In line with the note above suggest modifying to distinguish that this policy refers to the minimum density targets required by the Growth Plan.	shown in Table 2a, and the <u>minimum density</u> targets for Strategic Growth Areas as shown in Table 2b
9 (pdf pg 12)	78.1	This policy should be modified to acknowledge that many of the elements of the Regional Urban Structure are considered durable elements of the Region per policy section 35. Strategic Growth Areas are considered durable elements.	<ul> <li>(1) To provide a structure and a hierarchy in which to direct population and employment growth within the Urban Area to the planning horizon of this Plan, and beyond;</li> </ul>
N/A	79 (1)	Consider reinforcing the importance of the development of and enhancement of existing complete communities. Note: this policy was not included as part of draft ROPA 48.	(1) To provide an urban form that is complementary to existing developed areas, uses space more economically, promotes live-work relationships, fosters social interaction, enhances public safety and security, reduces travel by private automobile, promotes active transportation, and is environmentally more sustainable <u>all in order to promote</u>

			the development of <i>complete</i> <u>communities</u> .
11 (pdf pg 14)	79.1 (3)	Note that Primary and Secondary Nodes are reflective of Local Official Plan Urban Structures	Primary and Secondary Regional Nodes identified by symbol on Map 1H due to their contribution to the Regional Urban Structure, which have a concentration of residential and employment uses with development densities and patterns <u>reflective of Local Official Plan Urban</u> <u>Structures</u> and supportive of pedestrian traffic and public transit,
N/A	79 (7)	Reinforce the role of parks and open spaces as part of complete communities. Note: this policy was not included as part of draft ROPA 48.	(7) To provide high quality <u>public parks and</u> open spaces with site design and urban design standards that create attractive and vibrant places <u>to promote the</u> <u>development of complete communities</u> .
9 (pdf pg 13)	79(11)	Consider moving the objectives specific to Regional Corridors to somewhere within 79.1 or into a new policy 83 called Regional Corridors directly following Regional Nodes.	Change suggested.
11 (pdf pg 14)	79.2	This policy is very clear about the SGA hierarchy. Consider ways of revising Map 1H to reflect the hierarchy clearly.	See comments on Map 1H
12 (pdf pg 15)	79.3(7)	Since this is direction to the Local Municipality it is not appropriate to include a reference to a municipal comprehensive review. Refer instead to an Official Plan Review. The definition of municipal comprehensive review should also be modified to conform to the Growth Plan.	<ul> <li>prohibit site-specific Official Plan or Zoning By-law amendments to reduce <i>development</i> <i>density</i> within a Strategic Growth Area unless it is part of a <del>municipal comprehensive Local</del> <u>Official Plan R</u>eview <del>of the Official Plan</del> or a review of the Area-Specific Plan for the Strategic Growth Areas; and</li> <li>Modify 259.4 MUNICIPAL COMPREHENSIVE REVIEW</li> <li><u>A new official plan, or an official plan</u> <u>amendment, initiated by an upper- or single- tier municipality under section 26 of the</u></li> </ul>
			Planning Act that comprehensively applies the policies and schedules of the Growth Plan.
14 (pdf pg 17)	79.3(13) a) and b)	Suggest simplifying to more closely match the associated Growth Plan	Require Local Municipalities to plan for employment uses within <i>Strategic Growth</i> <i>Areas</i> by:

		policy 2.2.5.14 to allow for greater flexibility. The implementing mechanism is the Local Planning exercise to determine appropriate policies. These policies could instead be considered as guidance for Regional staff when considering local approaches to ensuring that local plans establish means of achieving a balance of residence and jobs. Suggestions include renumbering and deletions.		establishing development criteria outside of Employment Areas to ensure that the site specific redevelopment of any employment lands will retains-space for a similar number of jobs to remain accommodated on site; identify a minimum employment target for the Strategic Growth Area. considering a wide range of policy approaches to demonstrate to the Region that the Strategic Growth Areas has been planned to support a balance of residents and jobs appropriate to the growth area determined through area specific planning, or in general alignment with the target proportion of residents and jobs within the Strategic Growth Area as identified in Table 2b_ through policies that: remainder of 79.3(13)b) policies not ed above.
15 (pdf pg 18)	79.3(13)d)	Renumber to c)		
15 (pdf pg 18)	79.3(13)e)	Renumber to d) Monitoring the progress of all SGAs as well as all Secondary Plans is an exercise that the Region could incorporate in its routine monitoring and reporting. The Region, as the approval authority, will have a role in setting the local policies. Staff suggest that there are alternatives to setting specific policies about "significant deficits or deviations". Generally, suggest that the resident to employment ratios are guides or considerations as noted in comments related to Table 2b.	d)	monitoring on a regular basis and in conjunction with the Region, the amount of residential and employment development within <i>Strategic Growth Areas</i> to assess progress toward achieving the <u>balance</u> of residents and jobs appropriate to the growth area determined through Local area-specific planning, or the targets identified in Table 2b, and if there are significant deficits or deviations from these targets, developing a strategy to redress them as part of a review of the Local Official Plan or applicable Area-Specific Plan.
15&16 (pdf pg 18 & 19)	80(4)	This policy could be modified to reinforce the hierarchy established in Policy 79.2.	Areas o	ction <del>as the primary Strategic Growth of the</del> <u>in accordance with policy 79.2 of</u> gional Urban Structure hierarchy where

			a significant share of population and employment growth will be accommodated.
16 (pdf pg 19)	80.2 (2)	Suggest modifying to speak to the intent of 80.2(1).	Require Local Official Plans to show how policies have been developed to plan to achieve the development density target for Urban Growth Centres under Section 80.2(1) can be met including the submission to the Region of any supporting background documentation.
16 (pdf pg 19)	81(1)	Reinforce that the definition of public service facilities includes public parks and open spaces.	To leverage infrastructure investments and the development of public service facilities, <u>including public parks and open spaces</u> , to support a significant share
16 (pdf pg 19)	81 (2)	Consider the addition of parks.	To provide a range and mix of transit- supportive uses, such as residential, retail, office, <u>parks</u> and public uses that supports the area in a pedestrian-oriented urban environment.
16 & 17 (pdf pg 19 & 20)	81(6)	Significant is not a defined term in the context of this policy.	To protect existing significant employment uses within Major Transit Station Areas by ensuring land use compatibility with adjacent new development is achieved.
17 (pdf pg 20)	81.2(2) a)	Suggest this policy reference the durable elements of the plan (Policy 35).	The minimum density target for each Major Transit Station Area as prescribed in Table 2b, which may be achieved beyond the planning horizon of this Plan <u>in accordance with policy</u> 35;
17 (pdf pg 20)	81.2(2) a)	Reframe the target proportion of residents and jobs within each MTSA as considerations.	plan to achieve the target proportion a context appropriate balance of residents and jobs within each Major Transit Station Area <u>as guided by Local</u> <u>Area-Specific Planning or as generally</u> <u>established in set out in</u> Table 2b, where applicable
18 (pdf pg 21)	81.2(4) b)	Reframe as a locally confirmed context appropriate balance of residents and jobs along with appropriate policies and monitoring and other mechanisms.	identifies the <u>locally confirmed context</u> <u>appropriate balance</u> target proportion of residents and jobs that must be planned for in accordance with <u>as guided by</u> Table 2b.
18 (pdf pg 21)	81.2(4) e)	Consider adding the need to identify and protect for future transportation infrastructure to support active transportation.	identifies and protects lands that may be needed for future enhancement or expansion of transit <u>operations</u> , transportation and <i>infrastructure</i> , as appropriate.
18 (pdf pg 21)	81.2(4) g)	The policy could be modified to describe the action that the policies should take.	Identifies transportation and transit networks which are transit-supportive and achieve multimodal access to the stations, ensure connections to all transit service, and provide

			infrastructure to support active
			transportation.
18 (pdf pg 21)	81.2(4) i)	Section 86 identifies Region-wide Affordable Housing Targets. Given that these are Regional targets it would be more appropriate for the policy to direct the establishment of affordable housing targets to support the Region in achieving its targets. By their nature these intensification areas will far exceed the targets established at the Regional level.	establishes Affordable Housing targets to support the achievement of the targets in accordance with the applicable policies of Section 86 of this Plan, and inclusionary zoning policies authorizing a
		Consider distinguishing the affordable housing policy from the inclusionary zoning policy. Is it necessary to include the components of an Inclusionary Zoning Assessment Report in the policy? Should any of the requirements change, it may result in further amendments to the Plan. Consider simplifying the policy by referring to the Planning Act.	The Inclusionary Zoning <i>policies</i> will be based on the completion of an assessment report <u>in</u> <u>accordance with the Planning Act, which is</u> prepared by the <i>Region</i> or Local Municipality, to the satisfaction of the <i>Region</i> .
18 (pdf pg 21)	81.2(4) i)	Subject to suggested changes above. It is possible that this policy would be appropriate should the changes proposed to 79.3(13) be included.	includes detailed policies and development criteria to ensure that the development of employment uses planned within the Major Transit Station Area meet the requirements of Section 79.3(13) of this Plan
20 (pdf pg 23)	82(1)	Consider simplifying objective 1.	To recognize Strategic Growth Areas in the Region which are an integral component of the Regional Urban Structure and are historic downtown areas, or contain a concentration of public service facilities (i.e. hospitals, universities) and/or transit supportive, high density uses.
n/a	82 New objective	Since the policies establish a hierarchy of Regional Nodes the objectives should include an objective reflective of that policy. The policy in 82.1 should describe the distinctions among Primary and Secondary Regional Nodes.	(4) To reflect and reinforce Local Official Plan Urban Structures, and to establish a hierarchy of Primary and Secondary Regional Nodes.
	82.1	Suggested language.	The Regional Nodes as identified on Map 1H by symbol are <u>identified in Local Official Plans</u> and have been categorized as either Primary

	The Regional Nodes are recognizing areas that have already are subject to Local Official Plan policies.	Regional Nodes or Secondary Regional Nodes to reflect each respective node's role in the Region's Strategic Growth Area hierarchy established in policy 79.2.
82.1(1)	Modify wording. Distinguish Primary Regional Nodes from Secondary Regional Nodes.	<ul> <li>Primary <i>Regional</i> Nodes that are planned to accommodate growth at a scale appropriate to their context and display two or more of the following characteristics or features: <ul> <li>contain a concentration of existing or planned public service facilities; or,</li> <li>contain existing or planned transit-supportive high-density mixed uses;, or,</li> <li>which are located on a Regionally identified Higher Order Transit Corridor or alternatively will be planned to perform a regional transit network function at a scale appropriate for their context:</li> </ul> </li> <li>Primary <i>Regional Nodes</i> include: <ul> <li>a) Uptown Core, Oakville;</li> <li>b) Hospital District, Oakville;</li> <li>c) Milton Education Village, Milton;</li> <li>d) Palermo Village, Oakville; and</li> <li>e) Uptown Urban Centre, Burlington.</li> </ul> </li> </ul>
82.1(2)	Modify wording. Distinguish Primary Regional Nodes from Secondary Regional Nodes.	Secondary Regional Nodes that are historicdowntown areas or villages that are plannedto accommodate mixed use intensificationgrowth at a scale appropriate to their context,and/or are intended to be a focus for growththrough mixed use intensification at a scaleappropriate for their context:Secondary Regional Nodes include:a)Neyagawa Urban Core, Oakville;b)Kerr Village, Oakville;c)Bronte Village, Oakville;d)Downtown Oakville;e)Downtown Georgetown, Halton Hills;andg)Guelph Street Corridor, Halton Hills.

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82.2	This set of policies should acknowledge the existing local policy framework. Please note that policy (2) in the tracked changes version of the policies uses the word encourage. City staff are supportive of this policy being framed as encourage to allow for a flexible local approach to determining whether a boundary and target is appropriate.	<ul> <li>It is the policy of the Region to:</li> <li>(1) Direct development with higher densities and mixed uses to <i>Regional Nodes</i> in accordance with the hierarchy identified in Section 79.2, <u>reflective of existing Local</u> <u>Official Plan policies</u> and based on the level of existing and planned transit service.</li> <li>(2) <u>Encourage Require</u> the Local Municipalities to delineate the boundaries of <i>Regional Nodes</i>, and identify a minimum density target expressed as the minimum number of residents and jobs per hectare for the delineated area, <u>where</u> <u>appropriate</u>.</li> <li>(3) For applicable Primary <i>Regional Nodes</i> identified in Table 2b, require the Local Municipalities to <u>develop policies in order</u> to plan to achieve the target proportion of residents and jobs specified <u>or identify an</u> <u>alternative proportion reflective of local</u> <u>context while still achieving a balance</u> <u>among population and employment</u>.</li> <li>(4) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for Regional Nodes, in accordance with Sections 48 and 77(5) of this Plan.</li> </ul>
83.2(7)	<ul> <li>This policy is relevant to the Appleby GO MTSA area as well as the Burlington GO UGC/MTSA.</li> <li>These areas will be subject to future area-specific planning the policy should be framed with that lens. It is also suggested that the policy should describe the general objectives and leave latitude for the development of solutions or approaches that achieve the objective (treating these areas reflective of their dual purpose)that are appropriate to the local context.</li> </ul>	Where Employment Areas are located within a Major Transit Station Area as delineated on Map 1H, recognize the dual role and function of these Major Transit Station Areas as mixed use Strategic Growth Areas as well as the location of important existing employment uses, and, require Local Municipalities in accordance with 48 and 77(5) to recognize to plan for these areas by: a) recognizing the importance of existing employment uses and the potential for employment growth and intensification within the Employment Area and within adjacent mixed use areas;. The policies must consider land use compatibility and must ensure that new uses b) providing an appropriate interface between the Employment Area and adjacent mixed use areas to maintain land use compatibility; and

			<ul> <li>c) only permitting development within</li> <li>adjacent mixed use areas if land use</li> <li>compatibility can be addressed in a manner</li> <li>that protects existing employment uses in</li> <li>accordance with Section 79.3(12) of this Plan.</li> </ul>
	240	FREQUENT TRANSIT It will be important to distinguish the <b>Frequent Transit</b> definition from the <b>Higher Order Transit</b> definition and the <b>Higher Order Transit Corridors</b> identified on a variety of Regional Maps. Staff also understand that the identification of Regional Corridors will form part of a future ROPA.	No modification suggested.
Mapping	1H	It is somewhat difficult to distinguish Urban Growth Centres from MTSAs on Map 1H. The hierarchy outlined in 79.2 can be reinforced through Map 1H.	Propose mapping changes.
Mapping	1H	All but one of the supported employment conversion requests within the City are being implemented through ROPA 48. Given that the conversion of the employment lands identified as B-09 in Appendix C.1 of the Growth Concepts Discussion Paper are not expected to have an adverse impact on the overall supply of employment lands, this conversion should be included in ROPA 48.	Modify the mapping to include the conversion of these lands through ROPA 48.
Mapping	6B	Suggest a title change to Map 6B	Modify from Map 6b – Downtown Burlington GO UGC / MTSA To Map 6b – Downtown Burlington UGC / Burlington GO MTSA