

Halton Area Planning Partnership (HAPP)

2016 Coordinated Plan Review

Proposed Growth Plan

Joint Submission

September 2016



Introduction

The Halton Area Planning Partnership (HAPP) is comprised of Halton Region and the following Local Municipalities: the City of Burlington, the Town of Halton Hills, the Town of Milton, and the Town of Oakville.

This submission represents HAPP's response to the document "Proposed Growth Plan (2016), May 2016" (Proposed Plan) which was placed on the Environmental Registry as a Policy Proposal Notice (EBR Registry Number: 012-7194) on May 10, 2016.

Proposed changes to the Growth Plan include increases to intensification and density targets, policies to address climate change and the introduction of a natural heritage system for the entire Greater Golden Horseshoe.

The Halton Area Planning Partnership (HAPP) now takes this opportunity to have its collective voice heard by responding to the Proposed Growth Plan. HAPP's submission provides comments on the Growth Plan's proposed changes and provides HAPP's key recommendations in this letter.

HAPP's response includes:

1. This letter, which contains:
 - a. HAPP's Key Points regarding the whole of the document;
2. Appendix 1, which contains:
 - a. General comments regarding the whole of the Proposed Plan;
 - b. Comments specific to individual policies within the Proposed Plan

Background

A co-ordinated review of the four Provincial land use plans was undertaken in 2015. The Government of Ontario received extensive feedback after the initial round of consultations with stakeholders and the public. An Advisory Panel also provided its recommendations in December 2015 in their report, "Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015 – 2041".

The Government of Ontario has reviewed and considered all feedback received from stakeholders, the public, Indigenous communities and the Advisory Panel's recommendations. The government is now proposing changes to the four plans. The following Key Points outline the general policy comments developed collaboratively among the members of HAPP for the province's consideration before completion of the Coordinated Plans review.



Key Points of HAPP's Response

1. Harmonization and Alignment

Although efforts have been made to harmonize definitions across the Plans and with the PPS, opportunities still exist to better harmonize terminology, definitions and, where appropriate, policies. For example the Growth Plan provides definitions for key hydrologic areas, key hydrologic features, and key natural heritage features but the definitions differ from those found in the Greenbelt Plan. Aligning these elements is integral to balancing the requirements of each plan and achieving consistent implementation throughout the Greater Golden Horseshoe (GGH) and beyond.

HAPP members note that efficiencies can be gained by aligning the review of Growth Plan policies with the review of the Schedule 3 population and employment targets. Density and intensification targets affect strategies to accommodate population and employment targets. Informed discussions on the total amount of people and jobs a given municipality can accommodate cannot take place without considering how the totals will be accommodated – the reverse is also true. Aligning these elements will ensure that municipalities and other stakeholders have access to all relevant information when commenting on proposed changes to the Plans.

The Growth Plan should also be harmonized with other Provincial plans, such as the Ministry of Transportation Greater Golden Horseshoe Multi-Modal Transportation Plan and the Metrolinx Regional Transportation Plan. Within these plans, capital investments should be closely tied to policies – if a project has funding, municipalities can be certain that improvements to provincial or federal infrastructure will be made. The Growth Plan cannot be successfully implemented without harmonized plans at the provincial level.

2. Provincial Funding

Growth Plan implementation will not happen without stable, predictable, Provincial funding. Given the Growth Plan's proposed intensification target of 60 per cent, the need for funds to incentivize intensification, improve aging infrastructure and invest in transit is critical. Municipalities will also require funds for other components of the Growth Plan, such as community energy plans, agricultural support networks and community hubs. Expecting municipalities to pay for these additional community elements without providing additional revenue through funding or funding tools is unrealistic and will lead to stalled (or non-existent) implementation.

New funding models and financial tools are required to implement the Growth Plan's vision of "complete communities." The base assumptions for municipal revenue streams should be reviewed and updated so that new, innovative tools can provide sustainable funding for municipalities within the GGH. The proposed Growth Plan will ultimately change the way that communities are planned and built, however without corresponding changes to the ways in which infrastructure, community services and



amenities are financed and delivered, municipalities will not be able to successfully implement the policies of the proposed plan. In order to achieve vibrant, compact, pedestrian friendly, complete communities for all people at all stages of life as envisioned in the plan, appropriate Provincial funding is required

3. Transitioning to the Intensification and Density Targets

HAPP is generally supportive of the increased density and intensification targets in the proposed Growth Plan subject to Provincial support of the following qualifiers and additional comments found in Appendix 1. These include consideration of municipal need for time to transition from the existing targets to the proposed targets. Several land use planning initiatives are underway and will continue as planned while Growth Plan conformity exercises are completed.

A significant portion of Halton's growth is directed to its Designated Greenfield Area (DGA). Though HAPP is supportive of excluding Prime Employment Areas from density calculations, there are a number of low density features that should also be excluded, such as all roads and non-linear infrastructure that cannot be built more compactly (like sewage treatment plants). As well, schools and parks are important elements of complete communities that are also difficult to develop more compactly and as a result, should also be excluded from the 80 residents/ha target. The new target should only be measured over residential / mixed use areas (not employment areas).

All HAPP members feel strongly that the 80 people and jobs per hectare target should only apply to unplanned and undeveloped areas of the Designated Greenfield Area (DGA). Applying this target to the entire DGA implies that in progress area-specific plans should be revised to meet the new target, and that unplanned areas will have to be planned at very high densities in order to balance out previously planned land. HAPP suggests that the Province develop a new term and definition for the "developed portion" of the DGA applicable at date of adoption of this amendment to the Plan.

Though HAPP members generally support the 60 per cent intensification target, it should be phased in commencing at 2031, and be measured over the 2031 to 2041 time period, at the upper-tier level. Measuring the target from 2031 to 2041 will give municipalities time to determine the appropriate locations for intensification and build the infrastructure required to support it. Applying the target at the upper-tier level ensures that intensification is directed to areas in Halton that can adequately support it (such as areas served by transit).

4. Agriculture, Agricultural System and Agricultural Support Network

The Proposed Growth Plan provides greater support for agriculture and the agricultural community by introducing and allowing for agriculture-related and on-farm diversified uses, which is supported. However, HAPP's previous submission noted the need for policies that would support a 'systems' approach for agricultural processes, which was not fully addressed in any of the plans.



The concept of an 'Agricultural Support Network' has been introduced into both the Greenbelt Plan and the Growth Plan. The definition for 'Agricultural Support Network' does not separate economic development supporting goals and land uses throughout rural municipalities. The vague nature of the definition and implied land use implications of this network may create confusion about how the economic, community and social support systems that are part of rural communities and lands may be supported by municipalities.

Furthermore, the definition for 'Agricultural Support Network' suggests that it includes elements such as "regional agricultural infrastructure". Given that "infrastructure" is also a defined term, it is not clear what the intent of "regional agricultural infrastructure" is. It is critical that municipalities understand the implications of this. In addition, the policy direction for municipalities as it relates to the 'Agricultural Support Networks' is unclear, as the language used throughout the Greenbelt Plan is inconsistent (i.e., shall versus encourage).

5. Guidelines, Impact Assessments, Performance Indicators and Identification Criteria

The Greenbelt Plan and the Growth Plan both refer to a number of forthcoming provincial guidelines and systems mapping initiatives (e.g., watershed planning guidelines, agricultural system mapping, natural heritage systems mapping). As well, reference is frequently made to yet undeveloped classification systems (LEAR, Key Natural Heritage Systems, and Agricultural Systems), identification criteria (Natural Heritage Features), and impact assessment requirements (Agricultural Impact Assessments) throughout the plans.

HAPP is supportive of the development of Provincial guidelines and methodologies to support the municipal implementation of Growth Plan policies. HAPP members are looking forward to a full consultation process on the standardized land needs methodology and watershed planning guidelines (particularly as it relates to settlement boundary expansions). Among other considerations, the Province should consider that HAPP recognizes the land budget methodology and guidelines are required as a prerequisite to implementation of the amended Growth Plan. Therefore, HAPP requests that the standardized land needs assessment methodology be prioritized accordingly.

These tools should be developed quickly, and in consultation with municipalities. It is recommended that the new tools reflect and respect existing criteria and processes in place at the municipal level, be harmonized across provincial plans, and continue to permit municipalities with the opportunity to be more restrictive.

Municipalities and other public agencies frequently have sound, detailed data used in the development of their own mapping, which reflects local conditions and have resulted in the development of a comprehensive and refined product. These methodologies and



resulting mapping are locally significant and should be used in the development of potential provincial land use system mapping changes.

Greater clarity is needed with regard to the expectations of municipalities and other public bodies as it relates to developing and reporting on performance indicators. Guidance and support from the Province to undertake this work is critical.

6. Implementation

When contemplating the development of the land needs assessment, consideration must be given to distinguishing between Designated Greenfield Areas and Built-Up Areas. Furthermore, there needs to be methodology to assist in forecasting job growth/redevelopment capacity within existing employment areas. Doing so would recognize that all municipalities within the Greater Golden Horseshoe are at different stages of development and a single greenfield oriented land needs assessment is not appropriate in all cases. HAPP members also recommend that the Growth Plan defer to municipal positions, and / or municipal Official Plans concerning the designation of Prime Employment Areas and Priority Transit Corridors, as well as the mapping of Natural Heritage and Agricultural Systems.

Since the release of the Growth Plan in 2006, Halton has been subject to a number of Provincial projects that conflict with Growth Plan principles. For example, GO Transit built a large parking structure at a key intersection in the Midtown Oakville Urban Growth Centre. Provincial policy and funding formulas for school boards does not mandate or facilitate compact school design and community hubs. These examples underscore that in order to ensure that the Growth Plan is implemented successfully, all Provincial ministries must adhere to Growth Plan policies.

HAPP notes that a greater commitment is needed from all Provincial ministries and agencies in advancing the objectives of the Growth Plan. Capital investments must align with the goals of the Growth Plan. Provincial reviews of Growth Plan supportive infrastructure should be prioritized. Partnerships between municipalities and Provincial agencies need to be fostered to accelerate the development of community facilities.

Finally, the Province should support municipalities' efforts to implement the Growth Plan by sheltering official plan conformity amendments from appeals to the Ontario Municipal Board, expediting the appeal process, or providing funds for municipalities' defense. Significant changes to the built-form in the GGH cannot occur without significant changes to underlying processes.

7. Climate Change and Net-Zero Communities

The introduction of policies addressing climate change and the concept of net-zero communities has been done without accompanying clarification of definitions or explanatory guidance to assist municipalities understanding the implications or



application of these policies. Further information and clear guidance on the goals of these policies and infrastructure changes which will be needed, are required.

Conclusion

HAPP is supportive of the general principles put forward in the Proposed Growth Plan, and appreciates the work that has gone into harmonizing the Growth Plan with the Greenbelt Plan. The success of the Growth Plan's implementation is dependent on long-term stable and predictable funding and funding tools from the Province for transit and infrastructure (particularly in intensification areas). HAPP members anticipate a full consultation on guidelines and methodologies developed by the Province to aid in implementation (particularly the standardized land needs assessment).

Thank you for providing the Region and its Local Municipalities the opportunity to comment on the development of these policy changes.

Respectfully submitted,



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APPENDIX 1a: Joint HAPP Response to Proposed Changes to the *Growth Plan* (May 2016)

Co-ordinated Land Use Planning Review - *Halton Region, City of Burlington, Town of Oakville, Town of Halton Hills, and Town of Milton*

Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
<p>1. Harmonization and Alignment</p>	<p>Although efforts have been made to harmonize definitions across the Plans and with the PPS, opportunities still exist to better harmonize terminology, definitions and, where appropriate, policies. For example the Growth Plan provides definitions for key hydrologic areas, key hydrologic features, and key natural heritage features but the definitions differ from those found in the Greenbelt Plan. Aligning these elements is integral to balancing the requirements of each plan and achieving consistent implementation throughout the Greater Golden Horseshoe (GGH) and beyond.</p> <p>HAPP members note that efficiencies can be gained by aligning the review of Growth Plan policies with the review of the Schedule 3 population and employment targets. Density and intensification targets affect strategies to accommodate population and employment targets. Informed discussions on the total amount of people and jobs a given municipality can accommodate cannot take place without considering how the totals will be accommodated – the reverse is also true. Aligning these elements will ensure that municipalities and other stakeholders have access to all relevant information when commenting on proposed changes to the Plans.</p> <p>The Growth Plan should also be harmonized with other Provincial plans, such as the Ministry of Transportation Greater Golden Horseshoe Multi-Modal Transportation Plan and the Metrolinx Regional Transportation Plan. Within these plans, capital investments should be closely tied to policies – if a project has funding, municipalities can be certain that improvements to provincial or federal infrastructure will be made. The Growth Plan cannot be successfully implemented without harmonized plans at the provincial level.</p>	<p>Terminology and definitions should be consistent between the Growth Plan, the Greenbelt Plan, the Niagara Escarpment Plan and the Provincial Policy Statement.</p> <p>Growth Plan policies and the population and employment targets found in Schedule 3 must be updated together.</p> <p>Timing between the Growth Plan, the Big Move and other Provincial plans should be aligned.</p>

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
2. Provincial Funding	<p>Growth Plan implementation will not happen without stable, predictable, Provincial funding. Given the Growth Plan's proposed intensification target of 60 per cent, the need for funds to incentivize intensification, improve aging infrastructure and invest in transit is critical. Municipalities will also require funds for other components of the Growth Plan, such as community energy plans, agricultural support networks and community hubs. Expecting municipalities to pay for these additional community elements without providing additional revenue through funding or funding tools is unrealistic and will lead to stalled (or non-existent) implementation.</p> <p>New funding models and financial tools are required to implement the Growth Plan's vision of "complete communities." The base assumptions for municipal revenue streams should be reviewed and updated so that new, innovative tools can provide sustainable funding for municipalities within the GGH. The proposed Growth Plan will ultimately change the way that communities are planned and built, however without corresponding changes to the ways in which infrastructure, community services and amenities are financed and delivered, municipalities will not be able to successfully implement the policies of the proposed plan. In order to achieve vibrant, compact, pedestrian friendly, complete communities for all people at all stages of life as envisioned in the plan, appropriate Provincial funding is required</p>	<p>Municipalities require funding to incentivize intensification and build the infrastructure to support it (including transit).</p> <p>Municipalities will not be able to build "complete communities" without changes to the base assumptions used for municipal revenue streams, or new funding tools that guarantee sustainable, long term funding.</p>
3. Transitioning to the Intensification and Density Targets	<p>HAPP is generally supportive of the increased density and intensification targets in the proposed Growth Plan subject to Provincial support of the following qualifiers and additional comments found in Appendix 1. These include consideration of municipal need for time to transition from the existing targets to the proposed targets. Several land use planning initiatives are underway and will continue as planned while Growth Plan conformity exercises are completed.</p>	

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
	<p>A significant portion of Halton's growth is directed to its Designated Greenfield Area (DGA). Though HAPP is supportive of excluding Prime Employment Areas from density calculations, there are a number of low density features that should also be excluded, such as all roads and non-linear infrastructure that cannot be built more compactly (like sewage treatment plants). As well, schools and parks are important elements of complete communities that are also difficult to develop more compactly and as a result, should also be excluded from the 80 residents/ha target. The new target should only be measured over residential / mixed use areas (not employment areas).</p> <p>All HAPP members feel strongly that the 80 people and jobs per hectare target should only apply to unplanned and undeveloped areas of the Designated Greenfield Area (DGA). Applying this target to the entire DGA implies that in progress area-specific plans should be revised to meet the new target, and that unplanned areas will have to be planned at very high densities in order to balance out previously planned land. HAPP suggests that the Province develop a new term and definition for the "developed portion" of the DGA applicable at date of adoption of this amendment to the Plan.</p> <p>Though HAPP members generally support the 60 per cent intensification target, it should be phased in commencing at 2031, and be measured over the 2031 to 2041 time period, at the upper-tier level. Measuring the target from 2031 to 2041 will give municipalities time to determine the appropriate locations for intensification and build the infrastructure required to support it. Applying the target at the upper-tier level ensures that intensification is directed to areas in Halton that can adequately support it (such as areas served by transit).</p>	<p>The density target should exclude all employment areas, lands used for inherently non-compact infrastructure and portions of the DGA planned under a prior policy regime.</p> <p>The Growth Plan should include a new term and definition for the developed portions of the DGA.</p> <p>The intensification target should be measured across Halton, from 2031 to 2041.</p>

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
<p>4. Agriculture, Agricultural System and Agricultural Support Network</p>	<p>The Proposed Growth Plan provides greater support for agriculture and the agricultural community by introducing and allowing for agriculture-related and on-farm diversified uses, which is supported. However, HAPP's previous submission noted the need for policies that would support a 'systems' approach for agricultural processes, which was not fully addressed in the any of the plans.</p> <p>The concept of an 'Agricultural Support Network' has been introduced into both the Greenbelt Plan and the Growth Plan. The definition for 'Agricultural Support Network' does not separate economic development supporting goals and land uses throughout rural municipalities. The vague nature of the definition and implied land use implications of this network may create confusion about how the economic, community and social support systems that are part of rural communities and lands may be supported by municipalities.</p> <p>Furthermore, the definition for 'Agricultural Support Network' suggests that it includes elements such as "regional agricultural infrastructure". Given that "infrastructure" is also a defined term, it is not clear what the intent of "regional agricultural infrastructure" is. It is critical that municipalities understand the implications of this. In addition, the policy direction for municipalities as it relates to the 'Agricultural Support Networks' is unclear, as the language used throughout the Greenbelt Plan is inconsistent (i.e., shall versus encourage).</p>	<p>HAPP members would appreciate more information on how municipalities can bolster the economic, community and social supports in the agricultural community.</p> <p>Terms such as "regional agricultural infrastructure" must be defined to provide clarity for municipalities and other stakeholders.</p>
<p>5. Guidelines, Impact Assessments, Performance Indicators and Identification Criteria</p>	<p>The Greenbelt Plan and the Growth Plan both refer to a number of forthcoming provincial guidelines and systems mapping initiatives (e.g., watershed planning guidelines, agricultural system mapping, natural heritage systems mapping). As well, reference is frequently made to yet undeveloped classification systems (LEAR, Key Natural Heritage Systems, and Agricultural Systems), identification criteria (Natural Heritage Features), and impact assessment requirements (Agricultural Impact Assessments) throughout</p>	<p>HAPP members expect a full consultation process on the materials prepared by the Province to assist in the</p>

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
	<p>the plans.</p> <p>HAPP is supportive of the development of Provincial guidelines and methodologies to support the municipal implementation of Growth Plan policies. HAPP members are looking forward to a full consultation process on the standardized land needs methodology and watershed planning guidelines (particularly as it relates to settlement boundary expansions). Among other considerations, the Province should consider that HAPP recognizes the land budget methodology and guidelines are required as a prerequisite to implementation of the amended Growth Plan. Therefore, HAPP requests that the standardized land needs assessment methodology be prioritized accordingly.</p> <p>These tools should be developed quickly, and in consultation with municipalities. It is recommended that the new tools reflect and respect existing criteria and processes in place at the municipal level, be harmonized across provincial plans, and continue to permit municipalities with the opportunity to be more restrictive.</p> <p>Municipalities and other public agencies frequently have sound, detailed data used in the development of their own mapping, which reflects local conditions and have resulted in the development of a comprehensive and refined product. These methodologies and resulting mapping are locally significant and should be used in the development of potential provincial land use system mapping changes.</p> <p>Greater clarity is needed with regard to the expectations of municipalities and other public bodies as it relates to developing and reporting on performance indicators. Guidance and support from the Province to undertake this work is critical.</p>	<p>implementation of the Growth Plan.</p> <p>The Growth Plan should defer to local, detailed, mapping and data where it exists.</p>
6. Implementation	When contemplating the development of the land needs assessment, consideration must be given to distinguishing between Designated Greenfield Areas and Built-Up Areas.	The land needs assessment must consider municipal positions and / or Official Plans and recognize that Greater Golden Horseshoe municipalities are at different stages in

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
	<p>Furthermore, there needs to be methodology to assist in forecasting job growth/redevelopment capacity within existing employment areas. Doing so would recognize that all municipalities within the Greater Golden Horseshoe are at different stages of development and a single greenfield oriented land needs assessment is not appropriate in all cases. HAPP members also recommend that the Growth Plan defer to municipal positions, and / or municipal Official Plans concerning the designation of Prime Employment Areas and Priority Transit Corridors, as well as the mapping of Natural Heritage and Agricultural Systems.</p> <p>Since the release of the Growth Plan in 2006, Halton has been subject to a number of Provincial projects that conflict with Growth Plan principles. For example, GO Transit built a large parking structure at a key intersection in the Midtown Oakville Urban Growth Centre. Provincial policy and funding formulas for school boards does not mandate or facilitate compact school design and community hubs. These examples underscore that in order to ensure that the Growth Plan is implemented successfully, all Provincial ministries must adhere to Growth Plan policies.</p> <p>HAPP notes that a greater commitment is needed from all Provincial ministries and agencies in advancing the objectives of the Growth Plan. Capital investments must align with the goals of the Growth Plan. Provincial reviews of Growth Plan supportive infrastructure should be prioritized. Partnerships between municipalities and Provincial agencies need to be fostered to accelerate the development of community facilities.</p> <p>Finally, the Province should support municipalities' efforts to implement the Growth Plan by sheltering official plan conformity amendments from appeals to the Ontario Municipal Board, expediting the appeal process, or providing funds for municipalities' defense. Significant changes to the built-form in the GGH cannot occur without significant</p>	<p>their development.</p> <p>Provincial ministries must conform with the Growth Plan in order to implement it.</p> <p>All Provincial ministries must support the Growth Plan through capital investment, timely reviews of plans and collaboration.</p> <p>Municipalities should not be forced to bear the fiscal burden of defending Growth Plan conformity amendments to Official Plans at Ontario Municipal Board hearings.</p>

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Proposed Greenbelt Plan	HAPP Comments	Recommendations or Improvement
	changes to underlying processes.	
7. Climate Change and Net-Zero Communities	The introduction of policies addressing climate change and the concept of net-zero communities has been done without accompanying clarification of definitions or explanatory guidance to assist municipalities understanding the implications or application of these policies. Further information and clear guidance on the goals of these policies and infrastructure changes which will be needed, are required.	Municipalities need further guidance on implementing policies related to climate change net-zero communities.

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Numeric Reference	Policy Text	Comments
2.2 Policies for Where and How to Grow		
2.2.1 Managing Growth		
	<p>3. Applying the policies of this Plan will support the achievement of <i>complete communities</i> that:</p> <ul style="list-style-type: none"> a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services and <i>public service facilities</i>; b) provide for a diverse range and mix of housing, including secondary suites and <i>affordable</i> housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes; c) integrate and sustain the viability of transit services, where such services are planned or available; d) support overall quality of life, including human health, for people of all ages and abilities through the planning for and provision of: <ul style="list-style-type: none"> i. a range of transportation options, including options for the safe, comfortable and convenient use of <i>active transportation</i>; ii. a <i>compact built form</i> that reduces dependence on the automobile; iii. <i>public service facilities</i>, co-located and integrated in community hubs, that are accessible by <i>active transportation</i> and transit; iv. convenient access to local, healthy and affordable food options, including through urban agriculture; and v. a supply of parks, trails and other recreation facilities needed to support planned population and employment growth in a timely manner, particularly as <i>built-up areas</i> are intensified. 	<p>Higher density housing forms will be required to meet the DGA density targets. This will negatively affect the affordability of single detached homes.</p> <p>Currently, parks are included in DGA density calculations. It is requested that these areas be excluded form density calculations to facilitate implementation of policy direction.</p>

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Numeric Reference	Policy Text	Comments
	4. Upper- and single-tier municipalities will each develop an integrated approach to planning and managing growth to the horizon of this Plan, which will be implemented through a municipal comprehensive review and other supporting documents and will:	It is recommended that this policy be modified to ensure that an MCR within existing settlement areas should continue to apply to all municipalities (lower tier).
2.2.2 Built-up Areas		
	3. All upper- and single-tier municipalities will, at the time of their next <i>municipal comprehensive review</i> , increase their minimum intensification target such that a minimum of 60 per cent of all residential development occurring annually within each upper- and single-tier municipality will be within the <i>built-up area</i> .	Measuring the intensification target annually is inappropriate given the time lag between development approvals and occupancy. This policy should direct municipalities to achieve the intensification target from 2031 to 2041, with detailed implementation policies specified in Official Plans. Alternatively, the Province could provide transition policies to address the change in intensification targets.
2.2.3 Urban Growth Centres	2. <i>Urban growth centres</i> will be planned: a) as focal areas for investment in regional <i>public service facilities</i> , as well as commercial, recreational, cultural and entertainment uses; b) to accommodate and support the transit network at the regional scale and provide connection points for inter- and intra-regional transit; c) to serve as high-density major employment centres that will attract provincially, nationally or internationally significant employment uses; and d) to accommodate significant population and employment growth.	Clarification is required on how this transit network will be established and how coordination will occur as it requires alignment between Provincial, Regional, and local services providers.
2.2.4 Transit Corridors and Station Areas	1. <i>Priority transit corridors</i> will be delineated in official plans.	These corridors are multi-jurisdictional, and inclusion in Official Plans will require direction from the province to clarify who is responsible to identify and protect these areas.

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Numeric Reference	Policy Text	Comments
	<p>3. Upper- and single-tier municipalities, in consultation with lower-tier municipalities, will determine the size and shape of <i>major transit station areas</i> and delineate their boundaries in official plans.</p>	<p>This process should be led by lower-tier municipalities (not upper- and single tier municipalities).</p>
	<p>4. <i>Major transit station areas</i> will be planned and designed to be <i>transit-supportive</i> and to achieve <i>multimodal</i> access to stations and connections to nearby <i>trip generators</i> by providing, where appropriate:</p> <ul style="list-style-type: none"> a) connections to local and regional transit services to support <i>transit service integration</i>; b) <i>infrastructure</i> to support <i>active transportation</i>, including sidewalks, bicycle lanes and secure bicycle parking; and c) commuter pick-up/drop-off areas. 	<p>It is requested that multi-purpose trails be included in this definition.</p>
	<p>5. <i>Major transit station areas</i> will be planned to achieve, by 2041 or earlier, a minimum gross density target of:</p> <ul style="list-style-type: none"> a) 200 residents and jobs combined per hectare for those that are served by subways; b) 160 residents and jobs combined per hectare for those that are served by light rail transit or bus rapid transit; or c) 150 residents and jobs combined per hectare for those that are served by express rail service on the GO Transit network. 	<p>It is requested that land used for transit stations and associated parking be considered to be excluded from this density calculation.</p>

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Numeric Reference	Policy Text	Comments
	<p>10. The Province may identify additional <i>priority transit corridors</i> or <i>mobility hubs</i> and planning requirements for <i>priority transit corridors</i> or <i>mobility hubs</i>, to support the optimization of transit investments across the <i>GGH</i>, which may specify:</p> <ol style="list-style-type: none"> 1) the timeframes for implementation of the planning requirements; 2) the boundaries of the planning area that will be subject to the planning requirements; and 3) any additional requirements that may apply in relation to these areas. 	<p>The Province should identify additional priority transit corridors in consultation with municipalities.</p>
2.2.5 Employment		
	<p>4) The Minister may identify other <i>prime employment areas</i>.</p>	<p>The Minister should take heed of local Council positions and land use plans when identifying prime employment areas. This process should be fully transparent and consultative.</p> <p>More clarity is requested on the need and purpose of prime employment areas based on land needs assessment. The list of permitted uses appears to be limited to low density employment uses, such as logistics and warehousing, and could preclude the evolution of such areas over time to other higher employment generating uses without undertaking significant additional study.</p>
2.2.7 Designated Greenfield Areas		
	<p>2. The <i>designated greenfield area</i> of each upper- or single-tier municipality will be planned to achieve a minimum density target that is not less than 80 residents and jobs combined per hectare within the horizon of this Plan.</p>	

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	<p>3. The minimum density target will be measured over the entire <i>designated greenfield area</i> of each upper- or single-tier municipality, excluding the following:</p> <ul style="list-style-type: none"> a) <i>natural heritage features and areas, natural heritage systems and floodplains</i>, provided <i>development</i> is prohibited in these areas; b) rights-of-way for: <ul style="list-style-type: none"> i. electricity transmission lines; ii. <i>energy transmission pipelines</i>; iii. freeways, as defined by and mapped as part of the Ontario Road Network; and iv. railways; and c) <i>prime employment areas</i> that have been designated in official plans in accordance with policy 2.2.5.5. 	<p>This target should exclude all employment lands, lands used for infrastructure and portions of the DGA planned through a prior policy regime.</p> <p>A new term and definition should be created to refer to developed DGA lands.</p>
2.2.8 Settlement Area Boundary Expansions		
	<p>2. Where the need for a <i>settlement area</i> boundary expansion has been justified in accordance with policy 2.2.8.1, the <i>municipal comprehensive review</i> will determine the feasibility of a <i>settlement area</i> boundary expansion and identify the most appropriate location based on the following:</p> <ul style="list-style-type: none"> a) there are existing or planned <i>infrastructure and public services facilities</i> to support proposed growth and the development of <i>complete communities</i>; b) the <i>infrastructure and public service facilities</i> needed would be financially viable over the full life cycle of these assets, based on mechanisms such as asset management planning and revenue generation analyses; c) the proposed expansion aligns with a water and wastewater master plan or equivalent that has been completed in accordance with the policies in subsection 3.2.6; d) the proposed expansion aligns with a <i>stormwater master plan</i> or equivalent that has been completed in 	<p>Requirements b) through g), and i) are typically completed at the Secondary or Area-Specific Plan stage. As written, this policy implies that the entire “whitebelt” of a municipality must be studied prior to determining where the settlement area expansion will go.</p> <p>Clarification on the scale of these studies at the settlement expansion stage is requested. Some of these concepts are vague, or are used to describe a specific process used by lower tiers of government.</p> <p>The use of vague language such as “where possible” when referring to the protection of Natural Heritage and Agricultural Systems implies that settlement areas trump these systems. These elements should be balanced.</p>

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	<p>accordance with the policies in subsection 3.2.7;</p> <p>e) a <i>subwatershed plan</i> or equivalent has demonstrated that the proposed expansion, including the associated servicing, would not negatively impact the <i>water resource system</i>, including the <i>quality and quantity of water</i>;</p> <p>f) <i>key hydrologic areas</i> and <i>natural heritage systems</i> should be avoided where possible;</p> <p>g) for <i>settlement areas</i> that receive their water from or discharge their sewage to inland lakes, rivers or groundwater, a completed environmental assessment for new or expanded services has identified how expanded water and wastewater treatment capacity would be addressed in a manner that is fiscally and environmentally sustainable;</p> <p>h) <i>prime agricultural areas</i> should be avoided where possible. Where <i>prime agricultural areas</i> cannot be avoided, an <i>agricultural impact assessment</i> will be used in determining the location of the expansion based on minimizing and mitigating the impact on the <i>agricultural system</i> and evaluating alternative locations across the upper-or single-tier municipality in accordance with the following:</p> <ul style="list-style-type: none"> i. the lands do not comprise <i>specialty crop areas</i>; ii. there are no reasonable alternatives that avoid <i>prime agricultural areas</i>; and iii. there are no reasonable alternatives on lower priority agricultural lands in <i>prime agricultural areas</i>; <p>i) the <i>settlement area</i> to be expanded is in compliance with the <i>minimum distance separation formulae</i>;</p> <p>j) any impacts on agricultural operations and on the <i>agricultural support network</i> from expanding <i>settlement areas</i> would be avoided or, if avoidance is not possible,</p>	

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	<p>minimized and to the extent feasible mitigated as determined through an <i>agricultural impact assessment</i>;</p> <p>k) the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;</p> <p>l) the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment and Lake Simcoe Protection Plans and any applicable source protection plan; and</p> <p>m) within the Protected Countryside in the <i>Greenbelt Area</i>:</p> <ul style="list-style-type: none">i. the <i>settlement area</i> to be expanded is identified in the Greenbelt Plan as a Town/Village;ii. the proposed expansion would be modest in size;iii. the proposed expansion would be serviced by <i>municipal water and wastewater systems</i>; andiv. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.	

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3 Infrastructure to Support Growth		
3.2 Policies for Infrastructure to Support Growth		
3.2.1 Integrated Planning	5. The Province will work with public sector partners, including Metrolinx, to identify strategic <i>infrastructure</i> needs to support the implementation of this Plan through multi-year <i>infrastructure</i> planning for the <i>transportation system</i> and <i>public service facilities</i> .	<p>The province must take the lead and demonstrate its commitment to the Growth Plan itself by focusing its investment in public service facilities in a manner consistent with this Plan.</p> <p>This section should state that the Province will prioritize and expedite reviews of Environmental Assessments for Growth Plan required infrastructure.</p>
3.2.6 Water and Wastewater Systems		
	<p>3. For <i>settlement areas</i> that are serviced by rivers, inland lakes or groundwater, municipalities will not be permitted to extend water or wastewater services from a Great Lakes source unless:</p> <ul style="list-style-type: none"> a) the extension is required for reasons of public health and safety, in which case, the capacity of the water or wastewater services provided in these circumstances will be limited to that required to service the affected <i>settlement area</i>, including capacity for planned development within the approved <i>settlement area</i> boundary; b) in the case of an upper- or single-tier municipality with an <i>urban growth centre</i> outside of the <i>Greenbelt Area</i>, the need for the extension has been demonstrated and the extension: <ul style="list-style-type: none"> i. will service only the growth allocated to the <i>settlement area</i> with the <i>urban growth centre</i>; and ii. has been approved under an environmental assessment; or c) the extension had all necessary approvals as of 	<p>It is requested that the Province provide clarity on the intent of this policy. Guidance on how settlement areas can transition between groundwater use (more rural development) to lake based water use (more urban development) is requested.</p>

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	[placeholder for effective date] and is only to service growth within a <i>settlement area</i> boundary that was approved and in effect as of that date.	
3.2.7 Stormwater Management	<p>1. Municipalities will develop <i>stormwater master plans</i> or equivalent for serviced <i>settlement areas</i> that:</p> <ul style="list-style-type: none"> a) are informed by <i>watershed planning</i>; b) examine the cumulative environmental impacts of stormwater from existing and planned development, including an assessment of how extreme weather events will exacerbate these impacts; c) incorporate appropriate <i>low impact development</i> and <i>green infrastructure</i>; d) identify the need for stormwater retrofits, where appropriate; e) identify the full life cycle costs of the stormwater <i>infrastructure</i>, including maintenance costs, and develop options to pay for these costs over the long-term; and f) include an implementation and maintenance plan. 	Provincial direction on assessing the effects of extreme weather events is required to support municipalities.
	<p>2. Proposals for large-scale <i>development</i> proceeding by way of secondary plans, plans of subdivision and vacant land plans of condominium, and proposals for resort <i>development</i>, will be supported by a <i>stormwater management plan</i> or equivalent, that:</p> <ul style="list-style-type: none"> b) uses an integrated approach that includes <i>low impact development</i> and <i>green infrastructure</i> 	It is requested that this policy be revised: “...will be supported <i>where appropriate</i> ” – some soil types/topography are not suitable for LID.
3.2.8 Public Service Facilities	<p>2. <i>Public service facilities</i> and public services should be co-located in community hubs and integrated to promote cost-effectiveness.</p>	It is requested that school boards and other public service providers be brought into the process of identifying and working to develop community hubs, with the province, to bring these initiatives into compliance with the land use densities and directions of this plan.

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4 Protecting What is Valuable		
4.2 Policies for Protecting What is Valuable		
4.2.1 Water Resource Systems	3. Decisions on allocation of growth and planning for water, wastewater and stormwater <i>infrastructure</i> will be informed by <i>watershed planning</i> . Decisions on <i>settlement area</i> boundary expansions and secondary plans for <i>designated greenfield areas</i> will be informed by a <i>subwatershed plan</i> or equivalent.	<p>Watershed planning is large scale and multi-jurisdictional. This policy appears to imply that watershed plans will be needed to allocate growth. The level of detail typically gleaned from a watershed plan is not consistent with what would be needed to inform a boundary expansion.</p> <p>Clarification regarding the timing, agency responsible and intended implementation of this policy be provided to ensure that growth allocations may be initiated prior to completion of full watershed plans.</p>
4.2.2 Natural Heritage Systems	1. A comprehensive, integrated and long-term approach will be implemented to maintain, restore or enhance the diversity and connectivity of natural heritage features and areas in a given area, and their long-term ecological functions.	It is requested that the entirety of the Natural Heritage Systems policies (4.2.2) be made more consistent with those in the Greenbelt Plan.
	2. Official plans will incorporate a <i>natural heritage system</i> as mapped by the Province, and will apply appropriate designations and policies to maintain, restore or improve the diversity and connectivity of the system and the long-term ecological or <i>hydrologic functions</i> of the features and areas as set out in the policies in this subsection and the policies in subsections 4.2.3 and 4.2.4.	It is requested that where a municipality has a natural heritage system in place, that natural heritage system should be referenced instead of the Provincial version.
	3. In implementing policy 4.2.2.2, a municipality may refine the boundaries of the <i>natural heritage system</i> in a manner that is consistent with this Plan as well as the upper-tier official plan, where applicable.	<p>It is requested that this policy be replaced with the following:</p> <p>“Where an upper tier municipality has already mapped a natural heritage system in their Official Plan and has existing protection and enhancement policies in force as of [placeholder for the date this plan comes into effect], the Official Plan policies and mapping should be deemed to conform to the NHS as mapped by the Province.”</p>

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	<p>4. Within the <i>natural heritage system</i> identified in accordance with policy 4.2.2.2:</p> <ul style="list-style-type: none"> a) the full range of existing and new <i>agricultural uses, agriculture-related uses, on-farm diversified uses</i> and normal farm practices are permitted, subject to policy 4.2.2.4 c); b) a proposal for <i>development or site alteration</i> will demonstrate that: <ul style="list-style-type: none"> i. there will be no negative impacts on <i>key hydrologic features</i> or <i>key natural heritage features</i> and their functions; ii. connectivity for the movement of plants and animals along the <i>natural heritage system</i>, and between <i>key natural heritage features</i> and <i>key hydrologic features</i> located within 240 metres of each other will be maintained and, where possible, enhanced; 	<p>The addition of the distance of 240m or less separation between features is intended to provide clarity to this policy. However, it is requested that the source or justification of the distance chosen be provided either in this plan or in a guidelines document.</p> <p>Clarification is requested on whether there are intended to be limits to the number or extent of features to be connected as a result of this policy (e.g., certain number of metres away from core features).</p> <p>Some level of flexibility must be applied to development that occurs within the 240 metre connectivity area. There will be many cases where existing development (e.g. farm clusters, roads and other infrastructure) exist within the 240 metre area. Achieving connectivity in these areas may not be possible, and it would be more appropriate to direct new development to the areas that are already disturbed (e.g. new agricultural buildings or additions within an existing farm cluster).</p>
4.2.3 Key Hydrologic Features, Key Hydrologic Areas and Key Natural Heritage Features	<p>1. <i>Development or site alteration</i> is not permitted in <i>key hydrologic features</i> or <i>key natural heritage features</i>, with the exception of:</p> <ul style="list-style-type: none"> a) forest, fish and wildlife management; b) conservation and flood or erosion control projects, but only if the projects have been demonstrated to be necessary, and after all alternatives have been considered; c) activities that create or maintain <i>infrastructure</i> authorized under an environmental assessment process; d) <i>mineral aggregate operations</i> and wayside pits and quarries; e) existing uses as of [placeholder for effective date], subject to the following criteria: 	<p>The similar policy in the Greenbelt Plan is found in 3.2.2 Natural Heritage System Policies, and it is requested in the GBP that the policies include Key Hydrological features/areas as is done in the Growth Plan.</p> <p>It is requested that the Growth Plan and the Greenbelt Plan be harmonized.</p>

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	<ul style="list-style-type: none"> i. expansions to existing buildings and structures, accessory structures and uses, and conversions of legally existing uses which bring the use more into conformity with this Plan are permitted subject to a demonstration that the use does not expand into the <i>key hydrologic feature</i> or <i>key natural heritage feature</i> or its associated <i>vegetation protection zone</i>, unless there is no other alternative in which case any expansion shall be limited in scope and kept within close geographical proximity to the existing structure; and ii. expansions to existing buildings and structures for <i>agricultural uses, agriculture-related uses, on-farm diversified uses</i> and residential dwellings may be considered within <i>key hydrologic features</i> or <i>key natural heritage features</i> and their associated <i>vegetation protection zones</i> if it is demonstrated that there is no alternative, and the expansion in the feature is minimized and mitigated and, in the <i>vegetation protection zone</i>, is directed away from the feature to the maximum extent possible; and f) small scale structures for recreational uses, including boardwalks, footbridges, fences, docks and picnic facilities, if measures are taken to minimize negative impacts. 	
	<ul style="list-style-type: none"> 2. Within a <i>key hydrologic area</i>, large-scale <i>development</i> proceeding by way of secondary plans, plans of subdivision and vacant land plans of condominium, and resort <i>development</i> may be permitted where it is demonstrated that <i>hydrologic functions</i> will be protected and that the <i>development</i> will maintain, improve, or restore the <i>quality and quantity of water</i>, such that: <ul style="list-style-type: none"> a) in relation to <i>significant groundwater recharge areas</i>, 	<p>It is recommended that is policy be harmonized or made more consistent with the similar policy in the Greenbelt Plan 3.2.4 and 3.2.5.</p>

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	<p>pre-development infiltration on the site will be maintained, improved, or restored;</p> <p>b) in relation to <i>highly vulnerable aquifers</i>, the quality of water infiltrating the site will be maintained; and</p> <p>c) in relation to <i>significant surface water contribution areas</i>, the <i>quality and quantity of water</i>, including baseflow, will be protected.</p>	
	4. Policy 4.2.3.1 does not apply to <i>key natural heritage features</i> that are not in the <i>natural heritage system</i> identified in accordance with policy 4.2.2.2, but policy 2.1 of the PPS, 2014 will continue to apply.	It is recommended that this sub-policy should be moved to the beginning of the policy to enhance clarity about the intended application of the policies.
4.2.4 Lands Adjacent to Key Hydrologic Features and Key Natural Heritage Features	1. A proposal for <i>development</i> or <i>site alteration</i> within 120 metres of a <i>key natural heritage feature</i> or <i>key hydrologic feature</i> will require a natural heritage evaluation or hydrologic evaluation that identifies a <i>vegetation protection zone</i> . The <i>vegetation protection zone</i> for <i>key hydrologic features</i> , <i>fish habitat</i> , and <i>significant woodlands</i> will be no less than 30 metres wide. The <i>vegetation protection zone</i> will be established to achieve and be maintained as natural, self-sustaining vegetation.	Clarification is requested regarding the intention of requiring inclusion of a 30m VPZ which is not also extended to all Key Natural Heritage and Key Hydrological Features.
	<p>5. Policies 4.2.4.1, 4.2.4.2, 4.2.4.3, 4.2.4.4 and 4.2.4.5 do not apply, but policies 2.1 and 2.2 of the PPS, 2014 will continue to apply, to:</p> <p>a) <i>key hydrologic features</i> that are within a <i>settlement area</i> boundary;</p> <p>b) <i>key natural heritage features</i> that are within a <i>settlement area</i> boundary;</p> <p>c) <i>key natural heritage features</i> that are outside a <i>settlement area</i> boundary but are not in the <i>natural heritage system</i> identified in accordance with policy 4.2.2.2.</p>	It is recommended that this sub-policy should be moved to the beginning of the policy to enhance clarity about the intended application of the policies.
4.2.6 Agricultural System	1. The Province will identify the <i>agricultural system</i> for	In municipalities where agricultural systems have been

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	the <i>GGH</i> .	identified and mapped, these more detailed and locally scaled systems should be referenced by the province.
	4. The geographic continuity of the agricultural land base and the functional and economic connections to the <i>agricultural support network</i> will be maintained and enhanced.	<p>This policy is not consistent with the policy below (4.2.6.6) where the language related to “maintain and enhance” the agricultural support network is not as strong (“encourage” is used instead of “will”).</p> <p>It is requested that the language be changed to encourage for consistency and to reflect lack of available tools to guarantee maintenance of an agricultural support network under the <i>Planning Act</i>.</p>
	<p>6. Municipalities are encouraged to implement strategies and other approaches to sustain and enhance the <i>agricultural system</i> and the long-term economic prosperity and viability of the agri-food sector, including the maintenance and improvement of the <i>agricultural support network</i> by:</p> <ul style="list-style-type: none"> a) providing opportunities to support local food, urban and near-urban agriculture, and promoting the sustainability of agricultural, agri-food and agri-product businesses through protecting agricultural resources and minimizing land use conflicts; b) considering the <i>agricultural support network</i> in planning decisions to protect or enhance critical agricultural assets. Where negative impacts on the <i>agricultural system</i> are unavoidable, they will be assessed and mitigated to the extent feasible; c) undertaking long-term planning for agriculture, integrating agricultural economic development, <i>infrastructure</i>, goods movement and freight considerations with land use planning; d) preparing regional agri-food strategies or establishing or consulting with agricultural advisory committees or liaison officers; and 	<p>No specific definition is provided in either this plan or the Greenbelt Plan for Agriculture-supportive infrastructure, and the definition for infrastructure does not support the protection of agriculture as is intended in both plans.</p> <p>A specific definition for agriculture-supportive infrastructure is requested.</p>

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	e) maintaining, improving and providing opportunities for agriculture-supportive <i>infrastructure</i> both on and off farms.	
4.2.7 Cultural Heritage Resources	1. <i>Cultural heritage resources</i> will be conserved in accordance with the policies in the PPS, to foster a sense of place and benefit communities, particularly in <i>strategic growth areas</i> .	There is a similar policy in the Greenbelt Plan that quotes the PPS policy (instead of referencing it). It is requested that PPS policy references are made consistently in both plans.
4.2.8 Mineral Aggregate Resources		
	<p>3. Notwithstanding the policies of subsections 4.2.2, 4.2.3 and 4.2.4, within the <i>natural heritage system</i> identified in accordance with policy 4.2.2.2, <i>mineral aggregate operations</i> and wayside pits and quarries are subject to the following:</p> <p>a) no new <i>mineral aggregate operation</i> and no wayside pit and quarry, or any ancillary or accessory use thereto will be permitted in the following <i>key natural heritage features</i> and <i>key hydrologic features</i>:</p> <p>i. <i>significant wetlands</i>;</p> <p>ii. <i>habitat of endangered species and threatened species</i>; and</p> <p>iii. <i>significant woodlands</i> unless the <i>woodland</i> is occupied by young plantation or early successional habitat, as defined by the Province, in which case, the application must demonstrate that policies 4.2.8.5 b) and c) and 4.2.8.6 c) have been addressed and that they will be met by the operation;</p> <p>b) an application for a new <i>mineral aggregate operation</i> or new wayside pit and quarry may only be permitted in <i>key natural heritage features</i> and <i>key hydrologic features</i> not identified in 4.2.8.3 a) and any <i>vegetation protection zone</i> associated with such features where the application demonstrates:</p> <p>i. how the <i>water resource system</i> will be protected or enhanced; and</p>	

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	<ul style="list-style-type: none"> ii. that policies 4.2.8.5 b) and c) and 4.2.8.6 c) have been addressed, and that they will be met by the operation; and c) any application for a new <i>mineral aggregate operation</i> will be required to demonstrate: <ul style="list-style-type: none"> i. how the connectivity between <i>key hydrologic features</i> and <i>key natural heritage features</i> will be maintained before, during and after the extraction of <i>mineral aggregate resources</i>; ii. how the operator could immediately replace any habitat that would be lost from the site with equivalent habitat on another part of the site or on adjacent lands; and iii. how the <i>water resource system</i> will be protected or enhanced; 	4.2.8.3 c) ii While this requirement is generally supported, further clarity on exactly what is meant by this clause and how it can be demonstrated in an application should be provided.
	4. In <i>prime agricultural areas</i> , applications for new <i>mineral aggregate operations</i> will be supported by an <i>agricultural impact assessment</i> and, where possible, will seek to maintain or improve connectivity of the <i>agricultural system</i> .	It is requested that the province provide guidelines that describe how a mineral aggregate operation can maintain or improve the connectivity of the agricultural system.
4.2.9 A Culture of Conservation		
	3) Municipalities and industry will use best practices for the management of excess soil and fill generated during any <i>development</i> or <i>site alteration</i> , including <i>infrastructure</i> development, so as to ensure that: <ul style="list-style-type: none"> a) any excess soil or fill is reused on-site or locally to the maximum extent possible; and b) fill received at a site will not cause an adverse effect with regard to the current or proposed use of the property or the natural environment. 	<p>It is requested that the site alteration best practices referenced in this policy be developed by the province for consistency.</p> <p>If a municipality has already developed a set of requirements for soil management during site alteration, then existing criteria should be considered and retain the ability to be more stringent than those developed by the province should that be the outcome.</p>
4.2.10 Climate Change		
	2. In planning to reduce greenhouse gas emissions and address the impacts of climate change, municipalities	It is requested that the province develop metrics and methodologies which will assist in the development of GHG

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	<p>are encouraged to:</p> <ul style="list-style-type: none">a) develop strategies to reduce greenhouse gas emissions and to improve resilience to climate change through land use planning, planning for <i>infrastructure</i>, including transit and energy, and the conservation objectives in policy 4.2.9.1;b) develop greenhouse gas inventories for transportation, buildings, waste management and municipal operations; andc) establish municipal interim and long-term greenhouse gas emission reduction targets that support provincial targets and reflect consideration of the goal of <i>net-zero communities</i>, and monitor and report on progress made towards the achievement of these targets.	<p>inventories and in the determination of communities as 'net-zero'.</p>

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5 Implementation and Interpretation		
5.2.2 Supplementary Direction	<p>1. In order to implement this Plan, the Minister will, where appropriate, identify, establish or update the following:</p> <ul style="list-style-type: none"> a) the <i>built boundary</i>; b) the size and location of the <i>urban growth centres</i>; c) a standard methodology for land needs assessment; d) <i>prime employment areas</i>, where necessary; and e) data standards for monitoring implementation of this Plan. 	<p>Provincial guidance is also requested for natural heritage and hydrologic evaluations.</p> <p>Updates to the Built Boundary should be made on a predictable, scheduled basis.</p> <p>The standardized land needs assessment should factor in the range and mix of employment types.</p>
	<p>2. In order to implement this Plan, the Province will, where appropriate, identify, establish or update the following:</p> <ul style="list-style-type: none"> a) <i>priority transit corridors</i> and planning requirements for <i>priority transit corridors</i>; b) mapping of the <i>agricultural system</i> for the GGH and related guidance; c) mapping of the <i>natural heritage system</i> for the GGH; and d) guidance on <i>watershed planning</i>. 	<p>Municipal participation is essential for identifying, establishing or updating these items.</p> <p>Provide clarification on whether priority transit corridors may include local transit corridors.</p> <p>It is requested that mapping of the agricultural and natural heritage systems reflect the more detailed and locally relevant mapping undertaken by municipalities, should these maps have already been developed through a local process.</p>
	<p>3. Where this Plan indicates that supplementary direction will be provided for implementation but the direction has not yet been issued, all relevant policies of this Plan continue to apply, and any policy that relies on supplementary direction should be implemented to the fullest extent possible.</p>	<p>Municipalities should be consulted in the development of these items, as some will have land budget impacts.</p>
5.2.3 Co-ordination	<p>2. Upper-tier municipalities, in consultation with lower-tier municipalities, will, through a <i>municipal comprehensive review</i>, provide policy direction to</p>	<p>A consistent methodology is required for the determination of capacity in built-up areas, which acknowledges the challenges of increasing density in built up areas.</p>

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	<p>implement the policies of this Plan, including:</p> <ul style="list-style-type: none"> a) identifying minimum intensification targets for lower-tier municipalities based on the capacity of <i>built-up areas</i>, including the applicable minimum density targets for <i>strategic growth areas</i> in this Plan, to achieve the minimum intensification target in this Plan; b) identifying minimum density targets for <i>strategic growth areas</i> in accordance with this Plan; c) identifying minimum density targets for the <i>designated greenfield areas</i> of the lower-tier municipalities, to achieve the minimum density target for <i>designated greenfield areas</i> in this Plan; d) allocating forecasted growth to the horizon of this Plan to the lower-tier municipalities; and e) providing policy direction on matters that cross municipal boundaries. 	
5.2.5 Targets	<p>3. A lower-tier municipality with an <i>urban growth centre</i> will have a minimum intensification target that is equal to or higher than the minimum intensification target for the corresponding upper-tier municipality.</p>	<p>Studies are required to determine whether Milton can accommodate the 60 per cent target, though there is support for this target at the Regional level.</p>
5.2.7 Schedules and Appendices	<p>1. The Minister will review the schedules in this Plan, including the forecasts contained in Schedule 3, at least every five years in consultation with municipalities, and may revise the schedules, where appropriate.</p>	<p>This section is silent on updates to the policies in the Growth Plan. All targets, schedules and policies should be updated comprehensively, ideally every ten years.</p>

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7 Definitions		
Active Transportation	Human-powered travel, including but not limited to, walking, cycling, inline skating and travel with the use of mobility aids, including motorized wheelchairs and other power-assisted devices moving at a comparable speed. (PPS, 2014)	It is requested that references to “non-motorized” forms of transportation are removed in other areas of this plan to ensure consistency with this definition.
Agricultural Impact Assessment	A study that evaluates the potential impacts of non-agricultural development on agricultural operations and the <i>agricultural system</i> and recommends ways to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts.	<p>Clarification needs to be provided by the province through guidelines, terms of reference or other criteria to assist in determining impacts on the Agricultural System, which includes the support network in addition to the agricultural land base.</p> <p>If municipalities have existing AIA criteria, these municipalities should be consulted in the development of provincial criteria, and maintain the ability to be more stringent than potential provincial guidance.</p>
Built Heritage Resource	A building, structure, monument, installation or any manufactured remnant that contributes to a property’s cultural heritage value or interest as identified by a community, including an Aboriginal community. <i>Built heritage resources</i> are generally located on property that has been designated under Parts IV or V of the Ontario Heritage Act, or included on local, provincial and/or federal registers. (PPS, 2014)	It is recommended that this definition be modified to reference local heritage registers (Sec. 4.2.7.1)
Compact Built Form	A land use pattern that encourages the efficient use of land, walkable neighbourhoods, mixed land uses (residential, retail, workplace and institutional) all within one neighbourhood, proximity to transit and reduced need for <i>infrastructure</i> . <i>Compact built form</i> can include detached and semi-detached houses on small lots as well as townhouses and walk-up apartments, multi-storey commercial developments, and apartments or offices above retail. Walkable neighbourhoods can be characterized by roads laid out in a well-connected network, destinations that are easily accessible by <i>active transportation</i> , sidewalks with minimal interruptions for vehicle	Compact Built Form may reduce infrastructure requirements in the long term. However, intensification for the purposes of increasing the compact form of development may require retrofitting/ upsizing of existing infrastructure to ensure that increased demand is accommodated when higher than initial infrastructure design.

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	access, and a pedestrian friendly environment along roads to encourage <i>active transportation</i> .	
Frequent Transit	A public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week.	It is recommended that this definition be changed to include: “...service that <u>typically</u> runs at least.....”
Key Hydrologic Features	Permanent streams, intermittent streams, inland lakes, seepage area and springs and <i>wetlands</i> . The identification and delineation of <i>key hydrologic features</i> will be informed by <i>watershed planning</i> , and other evaluations and assessments.	It is recommend that a definition for the term ‘intermittent stream’ be provided as its interpretation could be varied (i.e. does it include ‘ephemeral streams’?). The Evaluation, Classification and Management of Headwater Drainage Feature Guidelines January 2014 provide useful definitions for ‘intermittent flow’ and ‘ephemeral flow’.
Major Transit Station Area	The area including and around any existing or planned <i>higher order transit</i> station or stop within a <i>settlement area</i> ; or the area including and around a major bus depot in an urban core. <i>Major transit station areas</i> generally are defined as the area within an approximate 500m radius of a transit station, representing about a 10-minute walk.	There is an inconsistency in this definition with the Mobility Hub Guidelines, which state that it takes only 8 minutes to walk 500m. It is recommended that the words “or stop” be removed from this definition to ensure that only those areas which are identified as major transit station areas are considered for application of the intensification target of 150 people/jobs per Ha.
Municipal Comprehensive Review	A new official plan, or an official plan amendment, initiated by an upper- or single-tier municipality under section 26 of the Planning Act that comprehensively applies the policies and schedules of this Plan.	This definition appears to exclude lower-tier municipalities from initiating MCRs? It is requested that this be corrected to be inclusive of local municipalities.
Natural Heritage System	A system made up of natural heritage features and areas, and linkages intended to provide connectivity (at the regional or site level) and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. These systems can include <i>key natural heritage features</i> , federal and provincial parks and conservation reserves, other natural heritage features and areas, lands that	This definition uses <u>significant</u> wetlands and <u>significant</u> ANSIs whereas the definition of Key Natural Heritage Features and Key Hydrologic Features does not include <u>significant</u> for these terms. It is recommended that the reference to significant wetlands/ANSIs is not creating a conflict with the definitions/policies in this plan which address Key Hydrologic

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	have been restored or have the potential to be restored to a natural state, associated areas that support <i>hydrologic functions</i> , and working landscapes that enable ecological functions to continue. (Based on PPS, 2014 and modified for this Plan)	Features and Key Natural Heritage Features.
Sand Barren	<p>Land (not including land that is being used for agricultural purposes or no longer exhibits sand barren characteristics) that:</p> <ul style="list-style-type: none"> a) has sparse or patchy vegetation that is dominated by plants that are: <ul style="list-style-type: none"> i. adapted to severe drought and low nutrient levels; and ii. maintained by severe environmental limitations such as drought, low nutrient levels and periodic disturbances such as fire; b) has less than 25 per cent tree cover; c) has sandy soils (other than shorelines) exposed by natural erosion, depositional process or both; and d) has been further identified, by the Ministry of Natural Resources and Forestry or by any other person, according to evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time. <p>(Proposed Greenbelt Plan, 2016)</p>	<p>It is recommended that the specific MNRF evaluation procedures be referenced and used to identify Sand Barrens when the process is more generally referenced in sub-clause d).</p> <p>Additionally, this definition would only capture a subset of the ELC sand barrens which may lead to confusion. A more thorough and accurate definition should be included in this plan and the Greenbelt Plan.</p>
Savannah	<p>Land (not including land that is being used for agricultural purposes or no longer exhibits savannah characteristics) that:</p> <ul style="list-style-type: none"> a) has vegetation with a significant component of non-woody plants, including <i>tallgrass prairie</i> species that are maintained by seasonal drought, periodic disturbances such as fire, or both; b) has from 25 per cent to 60 per cent tree cover; 	<p>It is recommended that the specific MNRF evaluation procedures be referenced and used to identify Savannahs when the process is more generally referenced in sub-clause d).</p> <p>It is noted that this definition for Savannah is different than the Ecological Land Classification manual (1998) that is MNRFs current 'evaluation procedure' for identifying these features which may lead to confusion.</p>

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	<p>c) has mineral soils; and</p> <p>d) has been further identified, by the Ministry of Natural Resources and Forestry or by any other person, according to evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time.</p> <p>(Proposed Greenbelt Plan, 2016)</p>	<p>Should this definition be modified to reflect the Ecological Land Classification manual, then the definition in the Greenbelt Plan should be modified to match.</p>
Significant Woodland	<p>A <i>woodland</i> which is ecologically important in terms of features such as species composition, age of trees and stand history; functionally important due to its contribution to the broader landscape because of its location, size or due to the amount of forest cover in the planning area; or economically important due to site quality, species composition, or past management history. These are to be identified using criteria established by the Province. (Based on PPS, 2014 and modified for this Plan)</p>	<p>At this time, no provincially established criteria for the identification of Significant Woodland has been created, instead guidelines have been developed with municipalities tasked with generating criteria based on the guidelines. Given this, municipal criteria should be recognized in this definition, or provincial criteria should be developed.</p>
Tallgrass Prairies	<p>Land (not including land that is being used for agricultural purposes or no longer exhibits tallgrass prairie characteristics) that:</p> <p>a) has vegetation dominated by non-woody plants, including tallgrass prairie species that are maintained by seasonal drought, periodic disturbances such as fire, or both;</p> <p>b) has less than 25 per cent tree cover;</p> <p>c) has mineral soils; and</p> <p>d) has been further identified, by the Minister of Natural Resources and Forestry or by any other person, according to evaluation procedures established by the Ministry of Natural Resources and Forestry, as amended from time to time.</p> <p>(Proposed Greenbelt Plan, 2016)</p>	<p>It is recommended that the specific MNRF evaluation procedures be referenced and used to identify Tallgrass Prairies when the process is more generally referenced in sub-clause d).</p>

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Transportation System	A system consisting of facilities, corridors and rights-of-way for the movement of people and goods, and associated transportation facilities including transit stops and stations, sidewalks, cycle lanes, bus lanes, high occupancy vehicle lanes, rail facilities, parking facilities, park-and-ride lots, service centres, rest stops, vehicle inspection stations, inter-modal facilities, harbours, airports, marine facilities, ferries, canals and associated facilities such as storage and maintenance. (PPS, 2014)	The definition is requested to include reference to multi-use paths in addition to sidewalks.
Trip Generators	Destinations with high population densities or concentrated activities which generate a large number of trips (e.g., <i>urban growth centres</i> and other downtowns, <i>major office</i> and <i>office parks</i> , <i>major retail</i> , <i>employment areas</i> , community hubs and other <i>public service facilities</i> and other mixed-use areas)	The definition is requested to be revised to: “...with high population <u>and/or employment</u> densities..”
Wetlands	<p>Lands that are seasonally or permanently covered by shallow water, as well as lands where the water table is close to or at the surface. In either case the presence of abundant water has caused the formation of hydric soils and has favoured the dominance of either hydrophytic plants or water tolerant plants. The four major types of <i>wetlands</i> are swamps, marshes, bogs and fens.</p> <p>Periodically soaked or wet lands being used for agricultural purposes which no longer exhibit <i>wetland</i> characteristics are not considered to be <i>wetlands</i> for the purposes of this definition. (PPS, 2014)</p>	<p>It is requested that this definition be modified to include the final piece of the definition in the Greenbelt Plan:</p> <p>“Wetlands are further identified by the Ministry of Natural Resources and Forestry, or by any other person, according to valuation procedures established by the Ministry of Natural resources and Forestry, as amended from time to time.”</p> <p>If it is considered to not be appropriate to include this additional section of the definition, clarification is requested to provide the rationale for the difference.</p>