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September 30, 2016

Hon. Bill Mauro, Minister  
Ministry of Municipal Affairs  
777 Bay Street, 17th Floor  
Toronto, ON M5G 2E5

Hon. Chris Ballard, Minister  
Ministry of Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M5G 2E5



Honourable Sirs,

**Re: Township of King  
Planning Department Report Number P-2016-31R  
Re: Township of King's Submission to the  
2016 Co-ordinated Provincial Plan Review: Growth Plan, Greenbelt Plan, and Oak  
Ridges Moraine Conservation Plan**

Please be advised that at the Council Meeting of September 26<sup>th</sup>, 2016, Council received and approved recommendations which were provided by the King Township Planning Department regarding the 2016 review of the Provincial Plans applicable to the Township of King, being the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan.

We respectfully submit the Council endorsed comments as outlined in Planning Department Report Number P-2016-31R, a copy of which is attached for your information and file, which identifies comments and concerns King Township would like the Ministry of Municipal Affairs and Housing to address in the Province's review of the Four Provincial Plans.

Respectfully submitted,

for Kathryn Moyle  
Director of Clerks/By-law Enforcement  
Township Clerk  
Encls.

c.c. Denis Kelly, Clerk, Regional Municipality of York  
Stephen Kitchen, Director of Planning



THE CORPORATION OF THE TOWNSHIP OF KING

REPORT TO COMMITTEE OF THE WHOLE

Monday, September 26, 2016

Planning Department Report P-2016-31R

RE: 2016 Draft Policy Amendments; Coordinated Provincial Plan Review; Growth Plan, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan

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1. **RECOMMENDATIONS:**

The Planning Department respectfully submits the following recommendations:

- a) That Planning Report P-2016-31R be received as information;
- b) That Council endorse the comments and recommendations respecting the provincial review of the Provincial Plans applicable to King Township, being the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan embedded within Planning Report P-2016-31R;
- c) That the recommended comments outlined herein be submitted to the Ministry of Municipal Affairs and Housing prior to October 31, 2016 as the Township's submission to the Coordinated Provincial Land Use Plans review;
- d) That Planning staff continue to monitor the progress of the review of the Growth Plan of the Greater Golden Horseshoe, the Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan and report back as necessary, and
- e) That Planning Report P-2016-31R be circulated by the Township Clerk to the Ministry of Municipal Affairs and Housing and the Region of York.

2. **PURPOSE:**

This report is to (i) provide an overview of the proposed amendments to the Growth Plan for the Greater Golden Horseshoe (Growth Plan), Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan (ORMCP) in the context of the Township's previous comments on the Plans (ii) recommend comments on the 2016 proposed amendments resulting from the Coordinated Provincial Review, and (iii) provide these comments as the Township's submission to the Ministry of Municipal Affairs and Housing for its consideration and action.

3. **BACKGROUND**

This report follows a series of previous reports on this matter including: P-2014-01 and P-2014-07 presenting a high level review of the plans, and P-2015-20 which presented staff comments on the plans, as well as public comments received through the Township's consultation, including two open houses held on April 23, 2015. The comments presented by P-2015-20 were

submitted to the Province for consideration as part of its coordinated review of its land use plans.

Within the boundaries of King Township, three of four of the Provincial Plans apply: the Growth Plan for the Greater Golden Horseshoe (Growth Plan), Oak Ridges Moraine Conservation Plan (ORMCP) and Greenbelt Plan (GBP). The Niagara Escarpment Plan does not apply to lands within King Township, and as such has not been reviewed by Township staff.

The previous reports in this series include an overview of the objectives of each of the provincial plans. This report relies on the background information provided in previous reports in this regard.

In 2014 Township staff participated in consultation facilitated by Regional staff to proactively provide input to the Province on the land use plans in advance of the commencement of its 10 year review of the Greenbelt and ORMCP.

In February 2015 the Province commenced its Coordinated Land Use Plan Review, which incorporated a review of the Growth Plan along with the Greenbelt Plan and ORMCP. The Province undertook consultation and received feedback on the Plans during the first half of 2015. An Advisory Panel also provided its recommendations in its report entitled "Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015-2041", released in December 2015. The Township participated in the Province's consultation on the review, and provided a series of comments summarized in a matrix in Appendix A to this report. The matrix identifies how the Township's 2015 comments have been addressed by the proposed updates to the Plans. Follow-up comments are incorporated in the Recommended Comments sections of this report.

The proposed updated provincial Plans were released in May 2016. Since that time Planning staff has participated in information and technical sessions hosted by the Province and Regional staff. The Province is receiving feedback on the proposed amendments until October 31, 2016. The following sections of this report summarize the proposed amendments to the Plans and recommends comments on the changes.

#### **4. DISCUSSION & COMMENTS:**

This section of the report provides an overview of the proposed changes to the three Plans, identifies how the previous Township comments have been addressed, and provides recommendations for comments on the updated Plans.

##### **Overview of Proposed Amendments**

The proposed amendments to the Plans resulting from the Province's review to date are considerable, particularly to the Growth Plan and the Greenbelt Plan. As the earliest of the three Plans, updates to the ORMCP primarily address consistency with the Provincial Policy

Statement, 2014 (PPS) and the alignment with other provincial Plans. The proposed changes support the following themes, each of which is discussed below:

- Building Complete Communities
- Supporting Agriculture
- Protecting Natural Heritage and Water
- Addressing Climate Change
- Integrating Infrastructure
- Improving Plan Implementation & Measuring Performance
- Growing the Greenbelt

Recommended comments resulting from Planning staff's review of the proposed amendments are provided in italics at the end of each theme section.

#### Building Complete Communities

Common to all Plans is increased emphasis and guidance on achieving complete and sustainable communities. New policies are proposed to support the development of community hubs by encouraging public services to be located together, where they are accessible by transit and active transportation. There is also additional emphasis on and requirement for complete streets, urban design, public health, as well as on conserving cultural heritage and archaeological resources.

#### Intensification & Density

The intensification target in the Growth Plan (currently a minimum of 40%) is proposed to increase to a minimum of 60% of all new residential development occurring annually in the existing built-up area. Similarly, the designated greenfield area density target in the Growth Plan is proposed to increase to a minimum of 80 residents and jobs per hectare (from the current target of 50 residents and jobs per hectare), to be achieved across the Region. The proposed amendments provide for additional components to be excluded from the greenfield density calculations, including undevelopable floodplains, certain linear infrastructure rights-of-way, and prime employment areas. These 'net-outs' provide for a more standardized application of density targets within the Plan area. The proposed increased targets would come into effect at the time of the next municipal comprehensive review undertaken at the regional level.

The proposed updates to the Growth Plan include additional guidance and density targets specific to major transit station areas, which are defined as "the area including and around any existing or planned higher order transit station or stop within a settlement area...generally within an approximate 500 metre radius of the station representing about a 10 minute walk". The size and shape of major transit station areas would be determined by the upper-tier municipality and delineated in its official plan. Based upon staff's understanding of the proposed policies, the King City GO Station would be required to achieve a minimum gross density target of 150 residents and jobs per hectare by 2041.

Finally, a new policy is proposed in the Growth Plan that clarifies intensification and density targets would not require or enable growth in special policy areas or hazardous lands beyond

what is permitted under the PPS, 2014. This policy may impact intensification potential within the Schomberg main central area, much of which is within a Special Policy Area.

**Recommended Comments:**

1. *King Township recognizes and supports the benefits of increased densities and intensification, and the need to use land and infrastructure more efficiently. However, the Province's Growth Plan policies must recognize the diversity of municipalities (and communities within those municipalities), that exist in the Plan area, and therefore, the varying suitability of those municipalities/communities to accommodate growth objectives. One size does not fit all.*
2. *In the context of Comment #1, it has been challenging for King to achieve the current intensification and density targets in the Growth Plan, 2005. It is recognized that within York Region, certain municipalities have achieved densities above the minimum, thereby offsetting the densities below the minimum accommodated in King. The (i) size and population of King's settlement areas (ii) location of King's settlement areas within the ORM and Protected Countryside of the Greenbelt (iii) compatibility with existing community fabric and built form, and (iv) constraints on supporting services and infrastructure contribute to the achievement of densities that are locally appropriate in King, but are below the current minimum targets. It should be understood that the increased minimum intensification and greenfield density targets of the magnitude proposed will make it more challenging for King to contribute to the achievement of the targets in York Region. .*
3. *The proposed increases to intensification and greenfield density targets would have significant impacts on the Township's transportation and servicing infrastructure, and its ability to provide adequate community services infrastructure.*
4. *King Township has concerns with proposed Growth Plan policies establishing minimum density targets for major transit station areas, which would appear to require the King City GO rail station to develop at a minimum density of 150 residents and jobs per hectare. The specific minimum density target applied uniformly to all major transit station areas within the Growth Plan areas does not recognize the range of communities to which it would apply and presents the following challenges for King:*
  - a. *A target of this magnitude would create compatibility challenges with the existing King City community fabric and built form which generally consists of relatively small parcels supporting one- and two-storey core area buildings, and low density single detached residential neighbourhoods.*
  - b. *The GO station area in King City is adjacent to a Provincially Significant Wetland and identified Oak Ridges Moraine key natural heritage features, thereby reducing the area in close proximity to the station suitable for development/redevelopment.*
  - c. *King City is serviced with limited supporting transportation infrastructure (for example, local transit) connecting the GO rail station with the broader community outside the 500 metre walking radius. Consideration needs to be given to the differences in the frequency of service along the various rail lines (lack of two-way, all-day service). Development at higher densities in advance of increased service levels (i.e. two-way, all day service) will result in occupancy by residents who are auto-dependent, thereby defeating the purpose.*

*While the Township recognizes the opportunity to provide for increased density around the King City major transit station area, the proposed target of 150 residents and jobs per hectare is beyond what would be appropriate in the context of the King City community. Municipalities should set appropriate targets for main transit station areas based on good planning principles and local context.*

- 5. Confirm how the main transit station area is to be delineated. For example, would the 500 metre radius be projected from the edge of the transit authority's land holdings, or the location at which the transit vehicle is boarded? Confirm that this would be determined by the municipality in consideration of the local context?*
- 6. The core area of the King Township's community of Schomberg (one of three settlement areas in King Township) includes a Special Policy Area, and currently permits a mix of uses at a maximum height of three to four storeys. Growth Plan policy 5.2.5 states 'minimum intensification targets and density targets do not require or permit in a Special Policy Area development that is beyond what has been permitted'. Confirm that (i) municipalities continue to be able to provide for appropriate intensification and redevelopment in these areas, and (ii) the municipality would not be required to make up intensification units elsewhere.*
- 7. The Growth Plan should be modified to include specific policies encouraging/facilitating the reuse of brownfield and greyfield sites, and in particular the streamlining of the Record of Site Condition process with Planning Act approvals. The proposed Plan only addresses this matter generally.*

### Employment

Policies relating to employment are proposed to be modified to recognize different types of employment uses, and provide for appropriate locations for each. New policies differentiate between and relate to prime employment areas, employment areas, and major office.

Proposed changes to the Growth Plan require upper-tier municipalities to identify and protect prime employment areas. Prime employment area is a newly defined term and includes manufacturing, warehousing and logistics uses that are land extensive or have low employment densities. These uses require particular locations near goods movement corridors, and in certain cases, away from sensitive land uses. Conversion of prime employment areas to employment areas can only be considered as part of a regional municipal comprehensive review, subject to certain criteria. Conversion of prime employment to non-employment uses is prohibited.

Employment areas (not identified as prime) are clusters of business and economic activity and would permit a broader range of uses, including prime employment uses, offices, as well as commercial uses, where they are planned in areas that are accessible by transit and active transportation. Employment areas would prohibit residential and sensitive land uses to protect them over the long term, however they are also to be integrated with adjacent non-employment uses to develop mixed use, vibrant hubs, where appropriate. Conversion of employment areas to non-employment areas may only be permitted through a regional municipal comprehensive review, subject to satisfying certain criteria. Municipalities would be able to specifically identify

uses permitted in employment areas, and the role of any permitted retail uses; however the proposed Growth Plan no longer explicitly identifies major retail as a non-employment use.

Major office uses and institutional uses are directed to urban growth centres (not applicable in King), major transit station areas, and other strategic growth areas (currently called intensification areas), to be integrated with supportive community and transportation services and infrastructure.

King Township's Economic Development Strategy previously identified the protection of strategic employment lands along the 400 series highway network, and more specifically at the Highway 400 and King Road interchange to help King to contribute to York Region's long-term employment targets. The Township requested that the Province consider how lands adjacent to goods movement infrastructure could be best protected and utilized in light of opportunity for economic growth. As noted above, the proposed Growth Plan would require prime employment areas to be identified in the upper-tier official plan and protected over the long-term. The Province has not considered the removal of strategic employment lands from the Greenbelt as part of this review. The Township's employment land forecast to 2031 does not identify a need for additional employment lands. However, King Township previously recommended that the Greenbelt Plan provide for the development of strategic employment lands adjacent to 400 series highways should the need be demonstrated beyond 2031 to the satisfaction of the Minister, and upon recommendation of the local and regional municipality. This comment is reiterated below.

**Recommended Comments:**

8. *Confirm that the whole of an existing employment area that permits a mix of uses (for example manufacturing uses and major office) may be identified as a prime employment area at the municipality's discretion? To this end, major office should be recognized as a component of prime employment uses.*
9. *The employment uses hierarchy combined with the provision to exclude prime employment areas from designated greenfield area density calculations will overly complicate policy implementation. In a similar context as Comment 8 above, how would policy 2.2.7.3(b), which speaks to density calculation exclusions, apply in situations where "other" employment lands (supporting employment uses other than prime employment uses) have been identified as prime employment areas in the upper-tier official plan. For example, if the upper-tier municipality identifies "other" employment areas as prime employment areas, would the proportion of that prime employment area devoted to the traditional manufacturing use still be netted out of the designated greenfield density?*
10. *Consider requiring the upper-tier official plan to designate prime employment areas in each lower-tier municipality in order to ensure each lower-tier municipality has employment areas subject to the highest level of protection over the long-term.*
11. *The removal of the statement in Growth Plan employment lands policy 2.2.6 that major retail uses are non-employment uses would make it more difficult for municipalities to protect employment areas for employment uses as the term is defined in the Plan. This statement should remain in the Plan.*

12. *Include provisions in the Growth Plan and Greenbelt Plan to remove strategic employment lands adjacent to 400 series highways from the Greenbelt should the need be demonstrated beyond 2031, upon recommendation by the local and regional municipality, to the satisfaction of the Minister.*

#### Settlement Area Boundary Expansions

There are proposed changes to settlement area boundary expansion policies in all three Plans as follows:

##### **Growth Plan**

- Requirement for the Province to establish a standardized methodology to be used by all municipalities to assess land needs, and a requirement for municipalities to demonstrate a need for a settlement area boundary expansion based on the standard methodology;
- Expanded requirements to determine feasibility of an expansion pertaining to:
  - Full life-cycle financial viability of infrastructure and public service facilities required
  - Water, wastewater and stormwater master planning;
  - Sub-watershed planning to assess impacts on water quality and quantity;
  - Avoidance of natural heritage systems, hydrologic areas, and prime agricultural areas, and assessment of impacts on these systems;
  - Environmental Assessment Requirements for expansions of settlement areas serviced by groundwater, rivers or inland lakes.

##### **Greenbelt Plan**

- Allow upper-tier municipalities to consider expansions of Greenbelt Plan settlement area boundaries as part of regional municipal comprehensive review in accordance with Growth Plan policies. Currently boundary expansions are considered only at the time of the 10 year review of the Greenbelt Plan;
- The existing Greenbelt Plan tests for settlement areas boundary expansions within the Protected Countryside are retained in the Growth Plan (i.e. Greenbelt Plan directs to Growth Plan policies);
- Removal of the current Greenbelt Plan policy allowing for the minor rounding out of Hamlet boundaries at the time of municipal conformity.

##### **ORMCP**

- Aligning with the other Plans, amendments to provide for consideration of changes to settlement area boundaries at the time of the upper-tier municipal comprehensive review, rather than only at the time of a 10 year review of the ORMCP;
- Removal of the current ORMCP policy allowing minor rounding out of rural settlement area boundaries.

#### **Recommended Comments:**

13. *Confirm that the terms 'built up areas' and 'development' used in the Growth Plan definition of settlement area are not used in the context of their definitions.*
14. *The definition of 'settlement area' in the Greenbelt Plan is proposed to be modified to include the phrase 'where there are no lands that have been designated over the long-term, the settlement area may be no larger than the area where development is concentrated'.*



*Lands are included in the settlement area boundary of Nobleton that are not designated for urban development. How does this modification to the definition of settlement area affect communities such as Nobleton that have lands that are not designated for urban development within their settlement area boundaries? More specifically, where a settlement area includes lands designated agricultural or rural, would these lands be restricted from being re-designated to an urban land use?*

15. *Could municipalities consider to the minor rounding out of settlement area boundaries within the Plan areas as part of municipal conformity exercises, subject to the criteria outlined in the Plans?*

### **Supporting Agriculture**

Agricultural policies in the Greenbelt Plan and ORMCP have been modified to recognize the nature of the agricultural system, and the importance of an agricultural support network comprised of the land base, along with necessary infrastructure and assets (for example, food processors or grain dryers) to enable the sector to thrive. The proposed updates focus on the broader farming community allowing for more flexibility in scale, whereas current policy restricts agriculture-related and secondary uses to the scale of the farm. Further, there is a broadening of the types and scale of agriculture-related uses, and on-farm diversified uses permitted, which include a range of agri-tourism and home industry, aligning more closely with the PPS, 2014. Agriculture-related uses and on-farm diversified uses are required to be compatible with, and not hinder surrounding agricultural operations. Criteria to ensure compatibility of these uses will be based upon provincial Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas, currently in draft form.

New policies in the Greenbelt Plan and ORMCP clarify that proposed buildings and structures for agricultural uses, agriculture-related uses, and on-farm diversified uses within 120 metres of a key natural heritage feature or key hydrologic feature would be exempt from the requirement to undertake a natural heritage or hydrologic evaluation, subject to ensuring ecological impacts are minimized.

There are new requirements in all the Plans for agricultural impact assessments in situations where non-agricultural uses or infrastructure are proposed in specialty crop areas or prime agricultural areas to determine how adverse impacts are avoided, or if not possible, mitigated.

The ORMCP specifically has been amended to more closely align with the PPS, 2014 and the Greenbelt Plan by:

- Deleting the provision enabling a farm retirement lot, which is consistent with the lot creation policies in the Greenbelt Plan;
- Updating the lot creation policies to permit a severance for a surplus dwelling resulting from a farm consolidation; and
- Clarifying policy to permit the severance of two more lots for agricultural uses, provided the severed and retained lots are each 100 acres.

- Updating the definition of agricultural uses to include accommodation for full-time farm labour, and removing the requirement that such accommodation be temporary and mobile. This update is consistent with current policies in the Greenbelt Plan.

King Township provided a number of recommendations relating to the update and alignment of agricultural and rural policies in the ORMCP and Greenbelt Plan with PPS, 2014. Recommendations included providing for a greater range of permitted uses in support of agriculture, and allowing appropriate relief for agricultural development proposals from supporting studies in certain situations.

The proposed changes to agricultural policy address many of Township's 2015 comments identified in Appendix A as themes A (Agricultural Vitality and the Rural Economy), B (Equine Industry), E (Major Development in the ORM), and G (Lot Creation). Additional and follow-up comments are outlined below.

#### Rural Lands

The importance and purpose of the rural lands and its economy has been duly recognized in the updated Plans, consistent with the policies of the PPS, 2014. Rural lands should be supported by promoting diversification of the economic base and employment opportunities through goods and services, including value-added products, the sustainable management of resources, and using rural infrastructure and public service facilities efficiently. Proposed policies in the Greenbelt Plan and ORMCP recognize that where public service facilities exist on rural lands, consideration should be given to maintaining and adapting these as community hubs to meet the needs of the community. King previously requested that the rural municipalities be permitted to locate municipal facilities that serve large geographic areas within rural areas (a works yard for example) to provide for the provision of certain municipal services to both the rural areas and villages more efficiently. The updated Plans recognize and support existing facilities; however the request to allow new public service facilities on rural lands is reiterated in the comments below.

Finally, few modifications are proposed to the policies addressing recreational uses in the Greenbelt Plan and ORMCP areas, and therefore a previous request for additional guidance relating to the types and scale of such uses is also reiterated in the comments below.

#### **Recommended Comments:**

- 16. The Township supports the proposed policies to introduce an agricultural systems approach, consistent with PPS, 2014.*
- 17. The Township supports the requirement for agricultural impact assessments to protect agricultural resources and avoid/mitigate impacts from non-agricultural uses. Additional guidance material is required to understand the appropriate scope of an agricultural impact assessment, best practices for mitigation measures, required qualifications of persons preparing the assessment, and consideration of municipal resources required to review the documents.*

18. *Introduce explicit policies to prevent the degradation, and provide for remediation of agricultural lands (for example, the removal and placement of topsoil on agricultural land) to support the protection of the agricultural land base over the long-term.*
19. *The Township supports the proposed modifications to the ORMCP to allow for appropriate accommodations for full-time farm labour, consistent with the Greenbelt Plan.*
20. *Proposed Greenbelt Plan policies provide for home occupations and home industries in the context of on-farm diversified uses, which are permitted in the Protected Countryside. Home occupations and home-based businesses are a valuable sector of the rural economy. Recognize that home occupations are permitted as a component of the rural economy in general, and not only as an on-farm diversified use.*
21. *There should be opportunity to exempt certain agricultural proposals that exceed 500m<sup>2</sup> from the major development supporting documentation requirements, where it is demonstrated the intent of the Plans and policies can still be achieved. There may be situations for which it is not necessary to require the full complement of supporting materials related to major development (a proposal for two reasonably sized barns on a 100 acre farm parcel, for example).*
22. *Prepare technical guidelines to provide guidance to address conflicts between natural heritage preservation and agricultural practices, establishing a clear order of priority to balance these goals, where necessary. For example, standard crop rotation can result in lands left fallow for multiple years, enabling vegetation to establish, triggering natural heritage considerations. Another example relates to instances where lands are within a Specialty Crop Area and a Provincially Significant Wetland, causing uncertainty as to which policies may prevail.*
23. *The Township supports the proposed changes to lot creation policies to align the Greenbelt Plan and ORMCP. The Greenbelt Plan allows severance for new agriculture-related uses in specialty crop areas and prime agricultural areas, where the ORMCP does not. Consider aligning this remaining area of inconsistency.*
24. *Modify the policies exempting buildings and structures for agricultural purposes from the requirement to submit natural heritage and hydrological evaluations (Greenbelt Plan (3.2.5) and ORMCP (s. 22 & 26)) to also exempt a proposed dwelling that is grouped on the lot with the agricultural buildings, and is to provide accommodation for the farmer.*
25. *Subsection 13(3)13 of the ORMCP permits agriculture-related uses in the Countryside Area. Subsection 13(3)4.1 then restricts agriculture-related uses in the Countryside Area to prime agricultural areas. Subsection 13(3)4.1 should be referenced in subsection 13(3)13 to be clear about where agriculture-related uses are permitted.*
26. *Provide additional guidance material to address the nature and types of uses intended to be permitted as major recreational uses, and low intensity recreational uses in the Protected Countryside of the Greenbelt and the ORMCP. For example, would uses such as a paintball facility and a go-cart track be considered major recreational uses? Plan policies should be clearer, and/or guidelines should be developed to be more explicit regarding the characteristics of uses that are permitted. This could include a requirement that the use relies on the specific topography of the ORM Countryside (ex. Ski hill, golf course). Major recreation uses could be required to be a recreational pastime and be associated with the enjoyment of the outdoors/environment. The Plan policies/guidelines should also address*

*nuisance factors. King Township supports the recognition of existing public service facilities in rural areas, and the benefits of such locations to more efficiently serve the needs of rural municipalities. The Township requests that the updated policies in the Greenbelt Plan and ORMCP provide for municipalities to locate new public service facilities in the rural area where appropriate, in addition to co-locating such facilities in support of creating rural community service hubs.*

**Protecting Natural Heritage and Water**

The proposed changes on this theme relate to providing a more consistent natural heritage and water protection policy framework across all the plan areas. For example, the proposed changes would require the Province to identify a natural heritage system across the Greater Golden Horseshoe that would be eventually incorporated into municipal official plans. Whereas mapping of a provincial natural heritage system exists for the ORMCP and Greenbelt Plan areas, additional work is required for rural areas subject to the Growth Plan.

There is additional emphasis on and requirements for watershed planning as the basis of protection of water quality and quantity throughout all three Plans. New policies also require watershed planning to inform decisions on new or expanded infrastructure. In this regard, proposals for major development in the ORMCP and Greenbelt Plan areas would be subject to additional requirements to ensure the protection of key hydrologic areas and their functions. Proposals would be required to demonstrate there is sufficient assimilative capacity to deal with sewage from the proposed development.

King's previous request to introduce policies to better protect the Plan areas from being susceptible to illegal dumping of excess fill, and provide municipalities with tools to implement and enforce such policies has been addressed. All three Plans have been amended to require municipalities and industry to use best practices for soil re-use, and management of excess soil and fill, so as to avoid adverse impacts on the natural environment or the current or proposed use of the property. Additional guidance materials establishing best practices would be helpful to municipalities implementing this policy.

The Township's previous comments requested review and clarification of the ORMCP's landform conservation policies and Areas of Natural and Scientific Interest (Earth) that do not appear to have been addressed. As such, the comments are reiterated in the comments below.

**Recommended Comments:**

- 27. Develop additional guidance materials to establish best practices for soil re-use and management of excess soil and fill, and the acceptable standard that constitutes 'to the maximum extent possible' in order to enable municipalities to effectively implement this policy. Consideration of specific tools to implement and enforce these policies would be helpful.*
- 28. The ORMCP's Landform Conservation policies are not explicit as to how the thresholds for disturbance and impervious surface should be applied (for example, on an application basis,*

*or a lot basis). Clarify the intent of the policies, and consider whether they have been effectively and consistently implemented across the ORMCP Area.*

29. *The ORMCP's Earth Science ANSI policies have been difficult to implement. It has been King's experience that the field of expertise to study and prepare an Earth Science Heritage Evaluation is limited, and it is unclear as to how impacts of development on these features are to be assessed. This section should be revisited to assess its effectiveness, practicality of implementation, and how the policies have been applied and implemented across the ORMCP area. Further, technical guidelines on Landform Conservation in the ORMCP should include additional details on the characteristics and identification of Earth Science ANSIs, and the qualifications required of persons preparing and reviewing Earth Science Natural Heritage Evaluations.*

### **Addressing Climate Change**

The proposed Plans place addressing climate change at the forefront as a common theme, and objectives and policies to help reduce the impacts of climate change are integrated throughout. Policy directions in support of complete communities, increased density and intensification, and protection of natural heritage and agricultural resources provide the foundation to begin to address this matter, and to help improve the resiliency of communities within the Plan areas. The proposed changes to the Plans require the assessment of climate change impacts and greenhouse gas emissions as part of watershed, stormwater management, and infrastructure planning exercises. This includes requiring municipalities to develop stormwater master plans for settlement areas. In addition, new policies would require upper-tier municipalities to include climate change policies in official plans, and encourage the development of strategies to reduce greenhouse gas emissions, and set targets to move towards net-zero communities.

### **Recommended Comments:**

30. *King Township supports and recognizes the importance of climate change matters, and community sustainability and resilience in the Plans. King looks forward to provincial guidance documents to support municipal implementation of the new policies.*

### **Integrating Infrastructure**

Infrastructure-related updates to the Plans recognize the importance of integrating infrastructure planning with land use planning. For example, a new policy encourages the protection of infrastructure corridors and requires planning for such corridors to avoid/minimize impacts on natural heritage and agriculture. Policies are proposed that provide for infrastructure master plans, and asset management plans to ensure infrastructure is sustainable and financially feasible over its full life cycle. New policies set out requirements for new and expanded infrastructure to meet certain tests, and be supported by appropriate studies. These test and supporting documentation requirements would be more consistent across the Plan areas, as would infrastructure-related definitions and terminology.

King Township's previous comments concerning infrastructure recommended (i) clarifying the types and scale of infrastructure intended to be permitted in the ORM and Protected

Countryside of the Greenbelt (ii) addressing emerging infrastructure technologies, and (iii) harmonizing the Plans. Based upon King's experience implementing the Greenbelt Plan infrastructure policies in particular, recommendations also requested clarification of the provincial and municipal role in the infrastructure procurement process and additional provincial support on matters of provincial policy interpretation.

The infrastructure policies in the Plans have been modified provide for consistent language, definitions, and tests, and have been updated to reference new technology. In general, it appears the Plans provide for a broader range of the types of infrastructure, at a greater scale to serve surrounding urban areas. However, no further guidance has been included on the role of municipalities and the Province in the procurement process. This comment has therefore been reiterated for the Province's consideration below.

**Recommended Comments:**

31. *Energy Planning is dealt with in a very general way throughout the Plans. Guidelines confirming the municipality's role in energy planning from a land use planning perspective in consideration of the Province's Long Term Energy Plan, and participation in the regional energy planning process are required to facilitate effective collaboration between stakeholders.*
32. *Further to Comment 31 above, clearly define stakeholder (municipalities, public) roles and opportunities for participation in the Environmental Assessment (EA) process, and how the EA process relates to the Planning Act process required for certain types of infrastructure.*
33. *The Province should provide enhanced support to municipalities on matters of provincial policy application and interpretation, particularly when dealing with such infrastructure situations in which the municipality is the approval authority under the Planning Act, and a commenting agency to the Province under the EA Act for concurrent approvals processes.*
34. *Define 'Waste management systems', which has been added to the list of types of infrastructure listed in the ORMCP's infrastructure definition. The PPS defines 'waste management system' as "sites and facilities to accommodate solid waste from one or more municipalities and includes recycling facilities, transfer stations, processing sites, and disposal sites". It does not seem appropriate to locate waste management infrastructure in the ORM or Protected Countryside of the Greenbelt for which the objectives are to 'ensure that only land and resource uses to maintain, improve or restore the ecological and hydrological function of the areas are permitted' and 'gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health...'; respectively. Prohibit new waste management systems from locating on the ORM or in the Protected Countryside of the Greenbelt.*

**Growing the Greenbelt**

New policies have been added to the Greenbelt Plan to:

- Support the Province in leading a process to identify potential areas to be added to the Protected Countryside of the Greenbelt, focusing on ecological and hydrological significance; and

- Outline that the Province will consider municipal requests to grow the Greenbelt's Protected Countryside, or Urban River Valley designations.

The updated Greenbelt Plan would also grow the Greenbelt by recognizing major river valleys and coastal wetlands as part of the Urban River Valley system.

#### **Plan Implementation & Engagement and Monitoring**

As noted throughout this report, the Province's coordinated review of the Plans generally proposes to streamline and align the policy framework between the documents and to improve linkages with the PPS, 2014 and other provincial initiatives. The updates introduce new definitions and contemporary terminology in support of the proposed policy changes. New policies encourage coordination between planning authorities and First Nations & Metis communities, and the facilitation of general knowledge sharing in growth management and land use planning. The updated Plans continue to support data collection and monitoring efforts, and introduce municipal reporting requirements to measure their effectiveness.

The proposed changes generally address King's previous comments relating to improving alignment between the Plans and the PPS, 2014. The Province has committed to developing a number of technical guideline documents to support Plan policies, which would be helpful in assisting with municipal conformity and implementation, provided they are released in a timely manner.

The proposed Plans do not provide for a transition period, meaning that planning decisions would be required to conform to the Plans the day the Plans come into effect. Policies relating to updated intensification and density targets would be applicable to King upon the completion of the Region's next municipal comprehensive review. Recommended comments relating to Plan implementation are provided below.

#### **Recommended Comments:**

- 35. The Province's commitment to providing technical guidelines in support of its plans is very positive. It is requested that technical guidelines be completed and released in timely manner upon the approval of the Plans, particularly given there is no transition period, and planning decisions are required to conform immediately.*
- 36. Exempt from appeal rights for required conformity provincial exercises to help municipalities to implement the updated provincial Plans in a timely and efficient manner.*
- 37. It is requested that the Province close inactive Planning Act applications that are older than a certain time frame (for example, 8 years). In many cases, long inactive planning applications no longer uphold the intent of the Plans, and present challenges to municipal implementation and decision making in the interest of good planning. Alternatively, consider providing municipalities with enhanced tools to close long dormant planning applications to reduce appeals and ensure conformity.*
- 38. Add a road network to the Greenbelt Plan schedules to enhance ease of reference.*

It is intended that this report, including Appendix A, will be submitted to the Province prior to October 31, 2016 as the Township's submission to the Province's Coordinated Land Use Plan Review.

**Next Steps**

The King Township Official Plan Review process will continue to address Growth Plan, Greenbelt Plan, and the ORMCP conformity based on the existing Provincial Plans and the PPS, 2014. The work undertaken in support of King's Official Plan Review will consider closely the review of the provincial plans. At this point the timing of the completion of the provincial Plan review is not known. Should the timing of the completion of King's Official Plan Review coincide with the updated provincial Plans coming into effect, the Official Plan will be assessed at that time, and modified as may be necessary to incorporate updated policy concepts and terminology. In this regard, it should be noted that King will not be required to conform to the updated population, employment, intensification and density targets until such time as the Region completes its municipal comprehensive review and incorporates the new targets. Planning staff understands the Region's municipal comprehensive review has been placed on hold pending the completion of the Province's coordinated Plan review. Planning staff will continue to monitor the progress of the provincial review, and the subsequent completion of the Region's municipal comprehensive review in the context of King's policy initiatives.

**5. INTEGRATED SUSTAINABILITY PLAN LINKAGE:**

King Township's participation in the Province's review of the Growth Plan, Greenbelt Plan, and ORMCP is aligned with the Integrated Community Sustainability Plan's land use planning and infrastructure goals under the environmental pillar. The Sustainability Plan is also consistent with many community based socio-cultural, economic and financial goals because it will help to: (i) ensure the long-term protection of natural heritage and hydrological resources, agricultural and rural economy viability, and (ii) attain the necessary tools to achieve local goals for sustainability within the provincial policy framework.

**6. FINANCIAL IMPLICATIONS:**

There are no specific financial impacts associated with this Report.

**7. CONCLUSION:**

This report is to provide an overview of the proposed amendments to the Growth Plan for the Greater Golden Horseshoe (Growth Plan), Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan (ORMCP) in the context of the Township's previous comments on the Plans (ii) recommend comments on the 2016 proposed amendments resulting from the Coordinated Provincial Review, and (iii) provide these comments as the Township's submission to the Ministry of Municipal Affairs and Housing for its consideration and action.

Planning staff supports the intent of the Plans, King's valuable role in their implementation, and the effect the Plans have had on the local planning landscape. The recommended comments contained herein are intended to build upon the successes of the Plans to date, and Township



staff is pleased to see the proposed changes address many of the Township's previous comments.

It is respectfully recommended that Council endorse the comments outlined in this report which include Appendix A, and to direct staff to submit this feedback as the Township's submission to the Ministry of Municipal Affairs and Housing, as per the Recommendations in Section 1 for its consideration in the context of the coordinated land use plan review.

8. **ATTACHMENTS:**

Appendix A – Township of King 2015 Comments on Province's Coordinated Land Use Plan Review (submitted to Province as Planning Report P-2015-20, dated May 2015)

Prepared By:

  
Sarah Allin, MCIP, RPP  
Planner – Policy

Submitted By:

  
Stephen Kitchen, MCIP, RPP  
Director of Planning

**APPENDIX A TO P-2016-31R:**

**Previous 2015 Township Comments Submitted to the Province**

Theme	Number	Township Comment	How Comment has been Addressed?
<p><b>A. Agricultural Viability and the Rural Economy</b></p>	<p>1</p>	<p>Re-evaluate the definitions of agriculture, agriculture-related uses, and secondary uses to ensure they are reflective of contemporary practices, and to allow flexibility to apply a more systems- or farm community-based approach rather than all related and secondary uses required to be related to “a” or “the” farm. The definitions should be modified to apply to the local farming community, as determined by the municipality. Further, any modifications to these definitions should be consistent throughout provincial policy documents, including the PPS 2014.</p>	<p>Proposed amendments have modified the plans to introduce an agricultural system approach, consistent with PPS, 2014. This includes redefining the “agricultural system” to include an “agricultural support network” which is newly defined. Modifications to the ORMCP and GB Plan provide for a broader range of agriculture-related uses and enable such uses to serve the farming community in the area.</p>
	<p>2</p>	<p>As permitted in the PPS 2014, allow for on-farm diversification activities (such as crafts, farm-related tourism, farm-related processing) and value-added agricultural uses (small restaurant, cheese shop) to support agricultural viability and allow farmers to capitalize on rural economic opportunities, to help reduce economic risk on the farm. Consider requiring the farm operation on the property to produce a minimum proportion of the source product for the value added operation to allow for situations whereby the facility requires more product than can be produced on the farm.</p>	<p>Proposed amendments provide for on-farm diversified uses which include value-added agricultural products, aligned with PPS, 2014 to service the broader farming community.</p> <p>In the ORMCP’s Natural Core Areas and Natural Linkage Areas, on-farm diversified uses are permitted only in the Prime Agricultural Areas.</p> <p>Proposed amendments also provide for additional flexibility for agriculture-related uses to service the broader farming community.</p>
	<p>3</p>	<p>Introduce policies to protect the quality of agricultural lands for such purpose, perhaps in a manner similar to those that apply to the destruction of natural heritage features, and provide tools to municipalities to enforce policies to prevent deliberate actions causing the degradation of farmland.</p>	<p>The proposed ORMCP, GB Plan, and Growth Plan include new policies requiring agricultural impact assessments where non-agricultural uses are proposed in Specialty Crop Areas, and Prime Agricultural Areas to assess and avoid or mitigate potential adverse impacts.</p>

Theme	Number	Township Comment	How Comment has been Addressed?
			Agricultural impact assessments would also be required, for example, in support of proposed settlement area expansions.
	4	Expand the range of uses permitted in the rural area to include additional uses that have been traditionally located in the rural area to allow for the development of a rural economy, at a size and scale appropriate to the rural area, as determined by the municipality. Such uses could include nature- and agricultural-based tourism, apartments-in-houses, and secondary suites, second dwellings for farm help (subject to meeting local criteria), agricultural-related processing and packing operations, and produce storage facilities.	<p>The proposed changes to the ORMCP and GB Plan enable an expanded range of uses in the rural areas that include on-farm diversified uses (including agri-tourism, home occupations, and producing value-added products).</p> <p>Agricultural uses are permitted in rural areas. The amended definition of agricultural use in the GBP and ORMCP includes: value-retaining facilities and accommodations for full-time farm help, consistent with PPS, 2014.</p> <p>The ORMCP definition of Bed and Breakfast no longer restricts the number of guest rooms (currently a maximum of three guest rooms are permitted).</p>
	5	Address the inconsistency between the ORMCP and GBP relating to additional dwellings accessory to agricultural uses, where it has been demonstrated that on-site farm help is warranted. For example, the ORMCP requires that a second dwelling for farm help as a use accessory to the agricultural use must be temporary, mobile, or portable, whereas the GBP allows accommodation for full-time farm labour as part of the agricultural use. The temporary, mobile, and portable requirement can make it difficult for the farming community to provide quality housing and therefore attract employees. The current policies place agricultural lands on the moraine at a disadvantage compared with agricultural lands situated off the moraine.	<p>This matter has been addressed. The ORMCP definition of agricultural use is updated to include accommodation for full-time farm labour, consistent with PPS, 2014, and the Greenbelt Plan.</p> <p>Section 34(Uses Accessory to Agricultural Uses) of the ORMCP, 2001, requiring accommodation for full-time farm labour to be temporary and mobile, is proposed to be deleted.</p>

Theme	Number	Township Comment	How Comment has been Addressed?
	6	Modify rural area policies to better provide for and support home-based businesses, a valuable sector of the rural economy. These policies need to be supported by Township-wide broadband connectivity.	Home business and home industries are permitted throughout the ORMCP area. On-farm diversified uses, which include home occupations are permitted in prime agricultural areas in the Natural Core Area and Natural Linkage Area, and permitted in the Countryside Area. Rural lands are to support and provide the primary locations for a range of recreational, tourism, and resource-based commercial/industrial uses.  On-farm diversified uses (including home occupations and home industries) are permitted in the Protected Countryside of the Greenbelt.
	7	Predominantly rural municipalities be permitted to locate municipal facilities, such as a works yards, which service large geographic, within the GBP and the ORM. Due to the distances between settlement areas, there is a need to locate these facilities in a more efficient and sustainable manner to better service both villages and the rural countryside.	The proposed Greenbelt Plan includes a new policy (3.1.4.9) "Where public service facilities exist on rural lands, consideration should be given to maintaining and adapting these community hubs where feasible, to meet the needs of the community". Public service facilities and infrastructure are defined terms. The proposed ORMCP include a similar policy as a purpose of the Countryside Area (s. 13(1)(e)).
<b>B. Equine Industry</b>	8	Modify the policies of the ORMCP and GBP, as necessary to provide for a provincial land use policy environment that better supports the equine industry and support uses in rural areas.	The proposed Greenbelt Plan and ORMCP provide for accommodation of full-time farm labour consistently across the Plan areas, in addition to an expanded range of agriculture-related uses and on-farm diversified uses. These changes would appear to support the equine industry.
<b>C. Balancing</b>	9	Address conflicts between natural heritage	While the proposed plans include new

<b>Theme</b>	<b>Number</b>	<b>Township Comment</b>	<b>How Comment has been Addressed?</b>
<b>Natural Heritage Protection and Normal Farm Practices</b>		preservation and agricultural practices, and introduce policies to establish a clear order of priority and balance these goals, where necessary.	requirements for agricultural impact assessments, it does not appear the proposed modifications explicitly address situations in which there is a direct conflict between the protection of natural heritage and the continuation of normal farm practices.
	10	Consult with the agricultural community in this regard to help inform reasonable policies to address this matter.	The proposed plans are available to all stakeholders for commenting.
<b>D. Evaluation of Small-Scale Development in the ORM</b>	11	The policies of Section 23 and 26 of the Oak Ridges Moraine Conservation Plan should be modified to provide municipalities the flexibility to reduce, scope or waive the application requirements for an existing residential lot, subject to certain criteria that ensures the intent of the ORMCP is fulfilled.	The proposed ORMCP does not appear to address this matter directly.
	12	Alternatively, consider reduced Minimum Areas of Influence for identified KNHFs and/or Hydrologically Sensitive Features within the built up area of Settlement Areas that are more appropriate for the nature/density of development in these more urban areas.	The proposed plan does not appear to address this matter directly.
	13	The Oak Ridges Moraine Foundation's paper entitled "Evaluation of the Oak Ridges Moraine Conservation Plan" addresses this issue and suggests also that the Province provide direction on this matter via Technical Guidelines.	The proposed plan does not appear to address this matter directly.
<b>E. Major Development in the ORM</b>	14	Develop more appropriate approval and information requirements for agricultural structure proposals that exceed 500 m <sup>2</sup> that ensure the protection of Key Natural Heritage Features, and Hydrologically Sensitive Features, but also align with the Province's	The proposed plan does not appear to provide for any relief from supporting documentation requirements for agricultural proposals that constitute major development. There are in fact new requirements for major development

Theme	Number	Township Comment	How Comment has been Addressed?
		goals to encourage agricultural viability.	<p>applications to demonstrate there is sufficient assimilative capacity to deal with sewage from the development.</p> <p>The proposed ORMCP does include new policies that would exempt buildings and structures for agricultural uses, agriculture-related uses and on-farm diversified uses from the requirements to undertake Natural Heritage Evaluations (NHE) and Hydrological Evaluations (HE) , while still ensuring that ecological impacts are minimized.</p>
<b>F. Recreational Uses in the ORM</b>	15	The review of the ORMCP should modify section 38 to clearly specify the nature and types of uses intended to be permitted as major recreational uses.	Section 38 of the ORMCP does not appear to have been modified.
	16	Modify section 37 describing low intensity recreational uses to clearly specify the nature and types of these uses intended to be permitted in the ORMCP.	Section 37 does not appear to have been modified with respect to clarifying what constitutes a major recreational use. References to green infrastructure and LIDs have been added, in addition to a requirement to ensure impacts on surrounding agricultural operations are avoided/mitigated.
	17	Provide additional direction on this matter via technical guidelines.	The Province has committed to development technical guidelines on certain topics. Guidelines have not been released to date.
<b>G. Lot Creation</b>	18	The review of the ORMCP should modify the lot creation policies to reduce ambiguity, clarify language, and make the Plan easier for readers to navigate with respect to this matter.	Lot creation policies in the ORMCP have been updated to better align with other provincial plans and the PPS, 2014.
	19	Address inconsistencies pertaining to lot creation between the ORMCP and the Protected Countryside policies of the Greenbelt Plan, particularly with respect to farm retirement lots, which are permitted	Lot creation policies of the proposed ORMCP and GB Plan have been modified to provide for greater consistency and alignment with PPS, 2014.

Theme	Number	Township Comment	How Comment has been Addressed?
		<p>in certain circumstances in the Oak Ridges Moraine area but not provided for in the agricultural areas of the Greenbelt. The PPS does not permit farm retirement lots, and it is recommended the Plans' policies share the same firm position on the issue of farm retirement lots and align the PPS, the ORMCP and GBP.</p>	<p>ORMCP proposed modifications:</p> <ul style="list-style-type: none"> <li>• ORMCP farm retirement lot policies are proposed to be deleted (aligning with the GB Plan and PPS);</li> <li>• Permitting severances for a surplus dwelling resulting from a farm consolidation</li> <li>• Permitting the severance of two or more lots, provided the severed and retained lots are at least 100 acres.</li> </ul>
<p><b>H. ORM Landform Conservation Policies</b></p>	<p>20</p>	<p>The ORMCP's Landform Conservation policies are unclear as to how the thresholds for disturbance and impervious surface should be applied (for example, on an application basis, or a lot basis). The review of the Oak Ridges Moraine Plan should revisit this policy section to more clearly identify and convey the intent of the policies, as well as to consider whether they have been effectively and consistently implemented across the ORMCP Area.</p>	<p>The proposed ORMCP does not appear to address this matter.</p>
<p><b>I. ORMCP Areas of Natural and Scientific Interest (Earth)</b></p>	<p>21</p>	<p>The Oak Ridges Moraine Conservation Plan's Earth ANSI policies have been difficult to implement. It has been Planning staff's experience that the field of expertise to study and prepare an Earth Science Heritage Evaluation is limited, and it is unclear as to how impacts of development on these features are to be assessed. Further, the boundaries of the Earth ANSIs in King appear to follow lot lines/concession blocks, raising questions about the science behind their delineation. The review of the Plan should:</p> <ul style="list-style-type: none"> <li>• Revisit this policy section to assess its effectiveness, practicality of implementation, and how the policies have been applied and implemented across the ORMCP area.</li> <li>• Reassess the methodology used to delineate</li> </ul>	<p>The proposed ORMCP does not appear to have addressed this matter.</p>

Theme	Number	Township Comment	How Comment has been Addressed?
		Earth Science ANSIs.	
<b>J. Infrastructure</b>	22	Revisit the infrastructure policies of the plans to clarify their intent, and tighten up and harmonize the language and terminology utilized within and among the Plans in this regard.	<p><b>Greenbelt Plan</b></p> <ul style="list-style-type: none"> <li>• Proposes change from requiring infrastructure to support "...rural settlement areas" to "Towns/Villages and Hamlets", providing for the intent to permit infrastructure in the rural area at a scale to serve surrounding urban areas in the Greenbelt.</li> <li>• New policy requiring new or expanding infrastructure to avoid specialty crop areas and prime agricultural areas unless need has been demonstrated, and there is no reasonable alternative.</li> <li>• New policy requiring agricultural impact assessment when infrastructure is proposed to cross specialty crop and prime agricultural areas.</li> <li>• New policy direction for infrastructure to minimally traverse/occupy the water resources system, and to minimum negative impacts.</li> <li>• New direction that planning for infrastructure be undertaken in an integrated and coordinated manner, including land use and master planning to ensure it is financially viable over its lifecycle.</li> </ul> <p><b>ORMCP</b></p> <ul style="list-style-type: none"> <li>• Modify the terminology from "transportation, infrastructure and utilities" to "infrastructure to align with the PPS, 2014 and other plans</li> <li>•</li> </ul>



Theme	Number	Township Comment	How Comment has been Addressed?
			<ul style="list-style-type: none"> <li>• The definition of infrastructure has been broadened to include waste management systems, electric generation facilities and transmission and distribution systems and septage treatment systems</li> <li>• New policies requiring infrastructure proposals to be supported by the necessary studies (integrated approach), and to demonstrate the need for the project and that there is no reasonable alternative where proposed in a prime agricultural area.</li> <li>• New requirement to demonstrate adequate servicing capacity availability, and greenhouse gas emissions assessment.</li> </ul> <p>Growth Plan</p> <ul style="list-style-type: none"> <li>• New policy encouraging the protection of infrastructure corridors; and require planning for infrastructure corridors to avoid, minimize or mitigate impacts on agricultural and natural heritage systems.</li> <li>• New policy adapted from existing GB Plan policy preventing the extension of Great Lakes based services to communities currently serviced by inland sources.</li> </ul> <p>The proposed plans also require municipalities to undertake stormwater master plans, informed by watershed planning.</p>
	23	Provide clarity with respect the types and scale of	See above. The plans include more detailed

<b>Theme</b>	<b>Number</b>	<b>Township Comment</b>	<b>How Comment has been Addressed?</b>
		infrastructure intended to be permitted in various areas and designations of the ORMCP and GBP areas.	policies and definitions have been generally aligned. The plans proposes a broader range of infrastructure, possibly at a greater scale to serve surrounding urban areas.
	24	Address and provide guidance for new and emerging infrastructure technologies.	The GBP includes new policies that address resiliency of infrastructure and accounting for new concepts such as green infrastructure and LIDs.
	25	Result in better coordination at the provincial level between provincial ministries to effectively and efficiently review and process proposals for provincial infrastructure.	This matter does not appear to be explicitly addressed; although the Province has undertaken reviews of the procurement process for large energy infrastructure.
	26	Clearly define and convey stakeholder (municipalities, public) roles and opportunities for participation in the Environmental Assessment (EA) process, and how the EA process relates to the Planning Act process required for certain types of infrastructure.	This matter does not appear to be addressed explicitly in the proposed policies.
	27	In general, the Province needs to provide better support to municipalities on matters of provincial policy application and interpretation, particularly when dealing with such infrastructure situations in which the municipality is at times the approval authority under the Planning Act, and a commenting agency to the Province under the EA Act for concurrent similar approvals processes.	This matter does not appear to be addressed explicitly in the proposed policies.
<b>K. Wellhead Protection Areas and Areas of High Aquifer Vulnerability</b>	28	Update the ORMCP and GBP as necessary to identify and resolve mapping and policy conflicts, and terminology inconsistencies.	New subsections are proposed that reference the Clean Water Act, and the Nutrient Management Act.

Theme	Number	Township Comment	How Comment has been Addressed?
	29	Strive for consistency between the various pieces of legislation in this regard to minimize confusion and complexity in applying and implementing these plans in jurisdictions such as King, where multiple provincial plan areas overlap.	No changes made in this regard to the ORMCP. Staff must continue to ensure all legislation is addressed.
<b>L. Excess Fill from Redevelopment and Construction Sites</b>	30	Update and introduce policies to better protect the Plan areas from being susceptible to illegal dumping of excess fill, and provide municipalities with tools to implement and enforce such policies.	The recognition of this issue in the plans is a positive change. All three Plans have been amended to require municipalities and industry to use best practices for soil re-use, and management of excess soil and fill, so as to avoid adverse impacts on the natural environment or the current or proposed use of the property.
<b>M. Strategic Employment Lands</b>	31	The King Township Economic Development Strategy (EDS) identified one of the actions to achieve Goal 1 is to pursue opportunities to designate the lands at Highway 400 and King Road as a Strategic Employment Area for future growth and the achievement of long-term employment targets for York Region.	This review is not considering the removal of lands from Greenbelt.
	32	<p>In March 2013, Council passed a resolution supporting the conclusions of the Greater Toronto Countryside Mayors Alliance report, entitled "Phase Two: Economic Strategies for the Sustainability of the Greater Toronto Countryside Municipalities", prepared by Millier, Dickinson Blais, including the following as it relates to the Places to Grow: Growth Plan for the Greater Golden Horseshoe, summarized in the related Township staff report ADMIN 2013-02:</p> <ul style="list-style-type: none"> <li>• Identify strategic employment lands that should be protected, particularly along the 400 series highway network. Where land adjacent to this infrastructure is otherwise</li> </ul>	<p>Growth Plan proposes new two-tier approach to employment lands.</p> <p>New policies that would require municipalities to designate suitable lands near goods movement facilities and corridors as prime employment areas; such lands would be protected over the long term for land intensive/low employment density uses. These lands would not be eligible for conversion to non-employment uses.</p> <p>New policies requiring municipalities to also designate other employment areas that would</p>

Theme	Number	Township Comment	How Comment has been Addressed?
		protected, that protection needs to be carefully considered in light of the opportunity it presents to stimulate economic growth.	<p>permit a wider range of employment uses.</p> <p>Employment areas are proposed to be designated in the upper-tier municipal official plan. Conversion would only be permitted through the Region's municipal comprehensive review.</p>
	33	Given that the Greenbelt Plan is likely only to be reviewed every ten years or more, it is recommended that the Greenbelt Plan be amended to allow for the development of strategic employment lands adjacent to 400 series Highway if there is sufficient demonstration and justification provided to the satisfaction of the Minister and on the recommendation of the local and regional municipality.	This review is not considering removing lands from the greenbelt.
<b>N. Coordination and Consistency</b>	34	Implement consistent definitions, language and terminology, and technical requirements to minimize the complexity of implementation in the local context, particularly where multiple provincial plans/documents are applicable within the same geographic area.	Efforts have been made to align the provincial Plans, and provide for more consistent terminology.
	35	Have greater regard for and mitigate inconsistencies between provincial planning documents with respect to how similar topic areas are addressed, such as in the case of additional dwellings for farm-help, lot creation, infrastructure, and definitions.	Efforts have been made to align the provincial Plans, and reduce topic-specific inconsistencies, including those related to accommodation for farm labour, lot creation, and definitions.
	36	Recognize the significant differences in the way in which each of the ORMCP and GBP is written, and make necessary adjustments to better harmonize the Plans.	Changes to the format/structure of the Plans are not proposed.

<b>Theme</b>	<b>Number</b>	<b>Township Comment</b>	<b>How Comment has been Addressed?</b>
	37	Improve readability of the ORMCP in particular, which requires interpreters to make numerous jumps between sections.	Changes to address this matter are not proposed.
<b>O. Local Context</b>	38	Modify the Plans to provide municipalities opportunities for flexibility in the application of certain policies to account for the local context in areas such as documentation requirements for small-scale residential uses, existing uses and expansions thereof, and support uses for the agricultural and rural economy.	Proposed changes provide for a broader range of uses and increased flexibility for the agricultural and rural economy. The proposed ORMCP includes new policies that would exempt buildings and structures for agricultural uses, agriculture-related uses and on-farm diversified uses from the requirements to undertake NHEs and HEs, while still ensuring that ecological impacts are minimized. No changes are proposed that would enable municipalities to exempt certain requirements (such as an NHE) for small-scale residential proposals on land within the built-up areas of the communities.
<b>P. Provincial Support</b>	39	Identify opportunities for providing enhanced provincial support to municipalities with respect to policy interpretation.	The Province has committed to develop a number of technical guidelines to support its policies. The list of topics has not yet been released.
	40	Identify areas that require additional technical guidelines, such as providing definitions for vague terms, including "local" and "small-scale", are used throughout the Plans, and further undertake to develop such guidelines.	The province has committed to develop a number of technical guidelines to support its policies. The list of topics has not yet been released. Ensure such guidelines are released in a timely manner so as to support municipal conformity exercises.
	41	Identify where policies have been interpreted and applied inconsistently between municipalities, provide interpretation, and modify such policies as necessary.	It does not appear any information has been released by the Province in this regard.
<b>Q. Monitoring</b>	42	Any monitoring undertaken by the Ministry of	Planning staff understands that monitoring data

Theme	Number	Township Comment	How Comment has been Addressed?
		Municipal Affairs and Housing to date should be made available to stakeholders as early in the process as possible to assist in providing meaningful input into the upcoming review of the ORMCP and GBP.	will not be released.
	43	King Township is interested in understanding what monitoring efforts and been undertaken to date, and whether any assessments have been made as to the effectiveness of the plans.	Planning staff understands that monitoring data will not be released.