

**Attachment 1 –
York Region & Agency Comments on Adopted Town of East Gwillimbury Official Plan (June 2022)
East Gwillimbury Official Plan Review
(As of May 10, 2023)**

Note: Unless otherwise stated comments have been provided by Regional Planning which includes comments from Development Services and Policy Planning and Data.

Document Section/ Commenter	Agency Review Comments	Proposed Action/ Response (To be determined and finalized with EG staff)
York Region		
General Comments		
General Comment	With the next submission please provide detailed responses with specific section references as to where, and how, the comment was addressed.	For information.
General Comment	<p><u>Planning Policy Conformity</u> The NEGOP is required to be consistent with, and conform to, the applicable Provincial Plans as well as the Regional Official Plan. While some of the background papers and staff reports touch on some of the planning policy context and policies the NEGOP needs to address, confirmation is required as to how the NEGOP is consistent with, or conforms to, the applicable policies of the:</p> <ul style="list-style-type: none"> • PPS, 2020 • Growth Plan, 2019 -amended in 2020 • Greenbelt Plan, 2017 • ORMCP, 2017 • LSPP, 2009 • York Region Official Plan, 2022 (Approved November 4, 2022) 	Conformity matters to be further discussed in working group meeting(s). Awaiting further EG Council direction to start clock.

	Please provide a Planning Policy Conformity Summary outlining in detail how the NEGOP addresses these applicable policies. Please include section and policy references to help facilitate an efficient review.	
General Comment	Through York Region’s Memorandum of Understanding with the Lake Simcoe Region Conservation Authority (LSRCA), we rely on them to comment on Natural Heritage and Natural Hazard matters within their regulated area on our behalf as it relates to the applicable Provincial and Regional planning policies. As such, we defer to their comments of this draft document which are outlined below.	For information.
General Comment	<p>York Region’s Transportation Master Plan and Water and Wastewater Master Plan Updates were endorsed by Regional Council in September 2022 and May 2022, respectively.</p> <p>York Region Transportation Master Plan Update York Region Water and Wastewater Master Plan Update</p> <p>In addition to the planning policy conformity information requested above, please confirm how the NEGOP takes into account York Region’s updated Master Plans. Further, all principles of the NEGOP should be consistent with York Region's Updated Transportation and Water and Wastewater Master Plans.</p>	Confirmation is required as to how the Adopted EG OP considered these approved plans. Possible modifications required. Refer to working group meeting discussions. Additional wording to be confirmed.
General Comment	Consideration should be given as to whether changes are required for Section 18.1 – Complete Applications, specifically 6.1.12.2 - Complete Application Requirements and 6.1.12.1 – Pre-Consultation Meeting, and 6.1.8 - Site Plan Approval, in light of the recent changes resulting from Bill 23, the implementation of Bill 109, and introduction of the CAP Process.	Possible modifications required.
General Comment	With the Province’s introduction of Bill 97 and recent release of the Proposed Provincial Planning Statement, the progression of this legislation and important planning documents will need to be closely monitored. Based on the timing of their implementation, further changes may be needed to the NEGOP.	For information. Possible modifications required.
Plan Specific Comments – Adopted OP Text		
General Comment	Table of Contents needs to be updated to reflect numbering and heading revisions.	Administrative update required by EG.
General Comment	In keeping with our previous comments, the NEGOP needs to be updated to include a fulsome Definition Section. Defined terms in this Section need to be based on and include updated Provincial and Regional Plan definitions, along	Modifications required.

	with the definitions requested by the LSRCA below. For ease of reference, all definitions should be relocated to this new section and defined terms clearly identified throughout the text of the OP (e.g. <i>italicized</i>).	
General Comment	The Settlement Areas (Central Growth Area and Mount Albert Settlement Area) in the NEGOP must be consistent with the Urban Area (Community Areas and Employment Areas) shown on Map 1A of the YROP. Areas formerly shown as Future Urban Areas in past drafts of the new YROP need to be shown as part of the Agricultural System consistent with Map 1A of the approved YROP.	Modifications required.
General Comment	Currently, Schedules of the NEGOP do not clearly distinguish between Designated Greenfield Areas and New Community Areas. We recommend New Community Areas as shown on Map 1B of the YROP be included on Schedule 2. We understand from the response matrix provided that “New Community Design Plan” were added to Schedule 3; however, for consistency purposes the New Community Area term should be used throughout the Plan and amended accordingly in the Schedule 3 legend. New Community Areas are subject to the New Community Area policies in the YROP, including phasing policies. The NEGOP needs to identify and reflect all the applicable New Community Area policies in the YROP throughout the entire Plan. Based on our review, the NEGOP does not reflect the New Community Areas or policies as outlined in the YROP. Wording needs to be changed in 2.3 (see comments below) to speak to New Community Areas. A section also needs to be added to 4.2 to address New Community Area and phasing requirements as outlined in the YROP (see comments below). In accordance with YROP policy 4.2.10, secondary plans are required for New Community Areas as identified on YROP Map 1B. These areas are to be shown on the NEGOP Schedules.	Modifications required.
General Comment	We recommend the Highway 404 Secondary Plan and its policies be included in the NEGOP and that its land use designations be reflective in the Schedules.	Suggested modifications.
General Comment	Throughout document consider renaming “Upper Tier Legislation/ Plans” subheading to “Provincial and Upper-Tier Planning Legislation” as policies under these subheadings appear not only to be related to the YROP but also Provincial Plan policies.	Suggested modification.
General Comment	The intensification hierarchy outlined in YROP policy 4.1.3 needs to be fully recognized and supported in local plans including policies for mix of uses, height and density minimums, particularly related to MTSAs and Major/Local Centres in the NEGOP (see detailed comments below).	Modifications required.

<p>General Comment</p>	<p>Confirmation is required as to how the policies within NEGOP sections 2.3 and 4.3 and the associated schedules conform with YROP policies 4.3.12 and 4.3.13 and identify <i>core employment areas</i> and <i>supporting employment areas</i> specifically for the Employment Areas identified in the YROP Map 1A.</p> <p>We suggest that an overlay be added to the Schedules to identify <i>core employment areas</i> and <i>supporting employment areas</i>. Additionally, Employment Areas that are designated in the YROP (Map 1A) need to be distinguished from the additional employment areas designated in the NEGOP.</p> <p>For ease of reference, the following are the YROP definitions of <i>core employment areas</i> and <i>supporting employment areas</i>:</p> <p><i>Core Employment Area</i>: Employment Areas and/or portions of Employment Areas to be designated in local official plans that generally are: i. Within Employment Areas adjacent to, or in proximity to 400-series highways ii. Adjacent to, or in proximity to, existing or planned employment uses that are incompatible with non-employment uses. Examples include noxious uses and/or traditional and/or land extensive employment uses such as manufacturing, warehousing and logistics iii. Not appropriate for more flexible employment uses</p> <p><i>Supporting Employment Area</i>: Employment Areas and/or portions of Employment Areas to be designated in local official plans that are on the periphery of Employment Areas and/or may be candidates for mixed employment uses because of their location within existing or proposed intensification areas. This generally includes Employment Areas that: a. are adjacent to major Regional arterial roads or on the fringe of Employment Areas; b. have significant portions of commercial, retail, and/or other service or knowledge-based uses; c. are directly abutting or in close proximity to residential or other sensitive uses and could benefit from more appropriate buffering from existing or future employment uses that may be incompatible. Examples include noxious uses, clusters of manufacturing or other traditional employment uses.</p>	<p>Confirmation and modifications required.</p>
<p>General Comment</p>	<p>Within strategic growth areas, secondary plans or other equivalent comprehensive planning studies and/or development must address the criteria outlined in YROP policy 4.4.24. Policies need to be added to the NEGOP to outline these requirements where applicable.</p>	<p>Modifications required.</p>
<p>General Comment</p>	<p>A policy needs to be added to the NEGOP to address YROP policy 4.4.25 “That approval of secondary plans and/or development within strategic growth areas shall be contingent on the availability of existing or planned infrastructure and other services and be consistent with the Regional intensification hierarchy outlined in policy 4.1.3. York Region may require phasing of development on the basis of the capacity of water, wastewater and/or transportation and transit systems, and/or the timing of required infrastructure. York Region may also require the coordination of</p>	<p>Modification required.</p>

	development applications to ensure an orderly, coordinated and phased approach to development and the provision of transportation, transit, water, wastewater and other infrastructure.”	
General Comment	<p>Within Local Corridors, development and secondary plans must address the criteria outlined in YROP policy 4.4.53. Policies need to be added to the NEGOP to outline these requirements where applicable.</p> <p>4.4.53 “That development, secondary plans, or other appropriate studies in the Local Corridors address the following criteria: a. The historic function and preservation and revitalization of historic mainstreet areas; b. The establishment of consistent setback and frontage provisions to encourage a continuous building form adjacent to the street right-of-way; c. Regional streetscaping policies; d. Limiting vehicle access from developments adjacent to Regional streets to maximize the efficiency of the Regional street system through techniques such as suitable local street access, shared driveways and interconnected properties; and e. Be consistent with the minimum criteria for strategic growth areas policy 4.4.24, as appropriate.”</p>	Modification required.
1.0 PURPOSE, VISION + GUIDING PRINCIPLES		
1.1.b) v. Purpose	<p>East Gwillimbury’s Planning Policy Context is complex and needs to be clearly outlined in this Section as per YROP policy 7.3.1 as follows:</p> <p>“1.1.b) v. Implements the York Region Official Plan, as approved by the Province on November 4, 2022 and Provincial policy including various pieces of legislation, plans, policy statements and guidelines, including the:</p> <ul style="list-style-type: none"> • Provincial Policy Statement • Growth Plan for the Greater Golden Horseshoe • Greenbelt Plan • Oak Ridges Moraine Conservation Plan • Lake Simcoe Protection Plan” 	Modifications required.
1.1 c) Purpose	<p>This policy currently states, “The Town of East Gwillimbury is a lower tier municipality within the upper tier York Region. Accordingly, this Plan is required to conform with the York Region Official Plan”.</p> <p>As a result of the changes associated with Bill 23, additional wording regarding the Regional Context is needed. At this time, we are suggesting the following wording that could be subject to further change:</p> <p>East Gwillimbury is one of nine local municipalities in York Region. In 2021, the Region had 1.2 million residents and approximately 600,000 jobs and is anticipated to grow by 810,000 residents and 325,000 jobs by 2051 reaching a population of over 2.08 million and employment of 991,000.</p>	Modification required.

	<p>A Regional Structure sets out a planning framework to help manage this growth in an orderly and sustainable way. This Regional Structure outlined on Schedule X includes:</p> <ul style="list-style-type: none"> • Areas that provide the focus for growth and development including the Urban Area, Towns and Villages, Urban Growth Centres, strategic growth areas, and major transit station areas (MTSAs) within a system of Regional Centres and Corridors; and • A Regional Greenlands System and Agricultural System that protect and enhance the natural environment and agricultural land base, where urbanization cannot occur. <p>The policies of the NEGOP reinforce the integrity, maintenance and enhancement of the Regional Structure ensuring infrastructure plans support growth, complete communities are realized, and agricultural and natural systems are maintained. The NEGOP sets the direction for growth and development impacting how our communities grow and change now, and in years to come.</p> <p>The NEGOP provides for a comprehensive, strategic approach to growth management that aligns land use policy with regional and local infrastructure required to support growth while maintaining financial sustainability. This approach allows East Gwillimbury and York Region to leverage existing infrastructure investments, stage and phase new development and infrastructure, align investments with the ability to recover development charge collections and grow in a financially sustainable manner.</p>	
--	---	--

2.0 GROWTH MANAGEMENT

<p>2.1 a) & b) Residential Growth & Employment Growth – Population and Employment Forecasts</p>	<p>Modifications are required to this section to conform and align with the YROP’s approved 2051 forecasts shown on Table 1 – York Region Population and Employment Forecast by Local Municipality.</p> <p>Table 1 - York Region Population and Employment Forecast for East Gwillimbury is currently shown in the approved YROP 2022 as follows:</p> <p>Table 1 – York Region Population and Employment Forecast by Local Municipality</p> <table border="1"> <thead> <tr> <th>Municipality</th> <th></th> <th>2016</th> <th>2021</th> <th>2031</th> <th>2041</th> <th>2051</th> </tr> </thead> <tbody> <tr> <td rowspan="2">East Gwillimbury</td> <td>Population</td> <td>24,700</td> <td>37,600</td> <td>52,900</td> <td>83,500</td> <td>127,700</td> </tr> <tr> <td>Employment</td> <td>9,500</td> <td>10,300</td> <td>15,700</td> <td>26,500</td> <td>43,500</td> </tr> </tbody> </table>	Municipality		2016	2021	2031	2041	2051	East Gwillimbury	Population	24,700	37,600	52,900	83,500	127,700	Employment	9,500	10,300	15,700	26,500	43,500	<p>Modifications required.</p>
Municipality		2016	2021	2031	2041	2051																
East Gwillimbury	Population	24,700	37,600	52,900	83,500	127,700																
	Employment	9,500	10,300	15,700	26,500	43,500																

	Because of the full suite of modifications related to the approval of the YROP 2022, further refinements to the Growth and Employment Forecasts were needed. These updated growth and employment forecast figures reflect the Minister’s modifications to the whitebelt and changes to the Greenbelt. They also include updates to better align with the 2021 Census and the current short term residential housing supply. Administrative amendments reflecting these update numbers are forthcoming; however, for information purposes, in the interim the updated 2051 forecast numbers for East Gwillimbury are a population of 128,600 and employment of 44,300.	
2.1 c) v. Minimum Growth Estimates – Population and Employment Forecasts	Resulting from recent Provincial legislative changes, the following modification is required: “To support and move forward with identified capital plans the Upper York Sewage Solutions Project and the Water Reclamation Centre , or other approved alternative servicing solutions/strategies.	Modification required.
2.2 a) ii. The Rural and Agricultural Area – Planning for Growth in an Urban Structure	The YROP Section 5.1 provides policy direction for the Agriculture System through three land use designations shown as Holland Marsh Specialty Crop Area, Agricultural Area, and the Rural Area on Map 1A – Land Use Designations. Additional details need to be incorporated into 2.2 a) ii to describe what the Agricultural System, Agricultural Area and Rural Area are, in alignment with the YROP. Definitions in alignment with the YROP for the Agricultural System, Agricultural Area and Rural Area should be included.	Modifications required.
2.2 b) iii. Future Urban Areas – Planning for Growth in an Urban Structure	With the Province’s approval of the YROP, Section 4.6 - Future Urban Areas was removed from the YROP as well as removed from all YROP Maps. To address conformity with the YROP, this policy and any references to “Future Urban Employment Areas” in the NEGOP and on the Schedules needs to be removed.	Modifications required.
2.2 b) iv. Future Urban Areas – Planning for Growth in an Urban Structure	With the Province’s approval of the YROP, Section 4.6 - Future Urban Areas was removed from the YROP as well as removed from all YROP Maps. To address conformity with the YROP, this policy and any references to “Future Urban Areas” in the NEGOP and on the Schedules needs to be removed.	Modifications required.
2.3 Accommodating Projected Growth	A subheading should be added between “Development of the Designated Greenfield Areas” (2.3 d-f) and “Secondary Plans” (2.3 g-h) that speaks to New Community Areas. This new section should state that New Community Areas are a component of the Designated Greenfield Areas and need to be identified on a Schedule and planned in keeping with the YROP.	Modifications required.
2.3 e) Accommodating Projected Growth	Designated Greenfield Areas that are planned to become New Community Areas (identified as DGA Community Areas on Schedule 2) shall achieve an overall minimum density of 60 residents and jobs combined per hectare. New Community Areas (identified on Schedule 3 NEGOP) shall achieve an overall minimum density of 65 residents and jobs combined per hectare.	Further clarification needed and modifications required.

	<p>Employment Areas and DGA Employment Areas along Highway 404 (identified on Schedule 2) shall achieve an overall minimum density of 55 jobs per hectare. Employment Areas and DGA Employment Areas in Holland Landing and Mount Albert (identified on Schedule 2) shall achieve an overall minimum density of 25 jobs per hectare. The way this current NEGOP policy is written, the employment targets only apply to DGA employment area. This is inconsistent with YROP where the employment area zone targets apply to the entire employment area not just in the (Employment Area) DGA.</p> <p>In the YROP, Employment Areas identified in Mount Albert and Holland Landing are required to accommodate a density target of 25 jobs per hectare. The NEGOP requires these areas to achieve a density target of 50 jobs per hectare. Please confirm if this is intentional and not an oversight.</p>	
<p>2.3 Phasing Subsection – Accommodating Protected Growth</p>	<p>Additional policies need to be added to this subsection addressing the YROP policies related to integrated growth management and phasing of development, specifically 2.2.3, 2.2.4, 2.2.8, Phasing in New Community Areas – 4.2, and 6.3.2. As such the following modifications are required:</p> <p><u>New policies</u></p> <p>“The Town shall phase growth in accordance the Town and York Region Master Plans, capital plans and the policies of this Plan, including policies in Section 4.2.xx – New Community Areas and Section 5.0 – Sustainable Infrastructure.”</p> <p>“The Town will work with York Region to ensure that growth is aligned with the timing and delivery of infrastructure by:</p> <ul style="list-style-type: none"> a. Phasing development in a manner that is coordinated with Regional plans, including York Region’s Water and Wastewater Master Plan, Transportation Master Plan, Fiscal Strategy and 10-Year Capital Plan, and the Town’s Infrastructure Master Plans; b. integrating growth-related infrastructure phasing plans with asset renewal plans; c. monitoring and adjusting the timing of infrastructure delivery to align with actual growth and fiscal plans; d. prioritizing infrastructure required to support areas proposed to accommodate growth in a manner that promotes the achievement of other policies and/or targets of this Plan; and, e. regularly monitoring system performance and capacity utilization, and prioritizing growth in areas where infrastructure may be underutilized.” <p>“ k) All development approvals within the Town shall be explicitly linked to the ability of the Town and York Region to provide municipal service infrastructure and transportation system capacity. All development approvals within the Town shall also be conditional upon commitments from the Town and/or the proponent of any development</p>	<p>Modifications required.</p>

	proposal to the timing and funding of any required road, active transportation facility, public service facility, park, and appropriate municipal service infrastructure. Before any development proceeds, all agreements must be in place, including financial agreements and development agreements, to provide for the servicing and community infrastructure required to accommodate growth.”	
3.0 BUILDING A SUCCESSFUL COMMUNITY		
3.1 c) iv. - A Successful Community (York Region Public Health - YRPH)	YRPH recommends adding Healthy Community Design and Healthy Environments to this section as follows: “A Healthy Community that includes a commitment to active transportation, healthy community design and community development that supports healthy lifestyles and healthy environments , including access to healthy food;”	Suggested modification
3.2.2 a) Elements of a Complete Community	YROP policy 2.3.15 requires local municipalities to review opportunities to enhance areas in existing communities, where appropriate, by d) incorporating public gathering spaces; f) reviewing existing destinations such as community facilities, retail and personal services to determine if additional services are required; and h) enhancing connections between Community Areas and Employment Areas. In keeping with this policy, include additional policy wording in this Section, or another section as appropriate.	Modification required
3.2.2 a) Elements of a Complete Community (YRPH)	In keeping with YROP policy 2.3.9, consider adding, “ iv. Support for and enhancement of urban agriculture and access to healthy and locally grown food and agricultural products as part of the elements of a Complete Community ”.	Suggested modification.
3.2.2 Strategic Growth Areas – Centres and Corridors	<ul style="list-style-type: none"> • Include policy language that development within Strategic Growth Areas be prioritized along existing rapid transit corridors (as per YROP policy 4.4.13). While rapid transit service is not yet available along Yonge Street and Green Lane in EG, policies to prioritize development along these corridors once the rapid transit network is built and operational can advance complete community objectives. • Consider relocating policy section 5.2.2.4 “Major Transit Station Areas (MTSAs)” to section 4.1 for more appropriate context and fit. 	Modification required and suggested modification.
3.2.2 d) The Strategic Growth Area – Centres and Corridors – Elements of a Complete Community	Consider expanding policy 3.2.2 d) to all areas (beyond just the Strategic Growth Area).	Suggested modification.
3.2.2 e) Public Service Facilities – The Strategic Growth Area – Centres and	That a new policy be added to 3.2.2 e) addressing YROP policy 2.3.7 as follows:	Modification required.

Corridors – Elements of a Complete Community	“vi. That new public service facilities shall be in close proximity to where people live and work and have active transportation linkages to public transit.”	
3.2.2 e) Public Service Facilities – The Strategic Growth Area – Centres and Corridors – Elements of a Complete Community	Policy 3.2.2 e) needs to be modified to address YROP policy 2.3.5.e which states: “To encourage local municipalities to foster an economic environment that supports businesses, grows employment and volunteer opportunities, and attracts and retains talent by developing policies in their official plans, strategies and programs, which may include: e) Provision of human services and temporary meeting or office space, to support businesses.”	Modification required.
3.2.3 A Range and Mix of Housing Types - Providing Housing Opportunities	A policy needs to be added to 3.2.3 to address YROP policy 2.3.39: “To provide for a mix and range of housing options suitable for all ages, household sizes and abilities, in partnership with local municipalities, senior levels of government, the development industry, community partners and other stakeholders including: a. Affordable housing to address need throughout the income spectrum, including market and community housing; b. Emergency and transitional housing; c. Co-housing; group, rooming, and special needs housing; and d. Purpose-built rental housing.”	Modification required.
3.2.3 A Range and Mix of Housing Types - Providing Housing Opportunities	A policy needs to be added to 3.2.3 to address YROP policy 2.3.43: “To promote housing options, including those identified in 2.3.39 through the use of land use planning, financial and other tools, including: a. Prioritizing the use of public lands for affordable housing, and emergency and transitional housing, including areas well serviced by transit; b. Encouraging the development industry to: i. show flexibility in design and construction choices for new developments; and ii. identify approaches and locations for affordable housing early in the development process c. Working with local municipalities and other key stakeholders to explore opportunities to deliver housing in a timely manner.”	Modification required.
3.2.3 A Range and Mix of Housing Types - Providing Housing Opportunities	A policy needs to be added to 3.2.3 to address YROP policy 2.3.44.c and 2.3.44.d: “To require that local municipal official plan and zoning by-laws permit a range of housing options, unit sizes, tenure and levels of affordability within each community, including c. Prohibition of demolition or conversion of purpose-built rental buildings if the rental vacancy rate is less than 3% for a period of more than three consecutive years in the local municipality; d. Permitting, facilitating and appropriately distributing housing options throughout communities, including those identified in policy 2.3.39”.	Modification required.

<p>3.2.3.a) A Range and Mix of Housing Types - Providing Housing Opportunities</p>	<p>NEGOP 3.2.3.a has wording "The Town shall make best efforts to maintain:..". This wording is not as strong as the YROP policy 4.2.3 wording "That an adequate supply of housing be maintained by providing:.."</p> <p>The following modification is required to conform with YROP policy 4.2.3: "The Town shall make best efforts to maintain:.."</p>	<p>Modification required.</p>
<p>3.2.3 f) vi. Promote Affordable Housing - Providing Housing Opportunities (YRPH)</p>	<p>While the provision of affordable housing is important, we recommend not reducing the amount of parkland required in affordable housing developments. Access to greenspace is an important factor related to health. Greenspace allotments can also help to adapt to climate change and reduce flood risk and support mental health. As such, we recommend the following modification: "Reduce parking requirements and/or parkland dedication requirements for projects that provide affordable housing;"</p>	<p>Suggested modification.</p>
<p>3.2.3 g) Monitoring the Housing Market - Providing Housing Opportunities</p>	<p>In accordance with YROP policy 2.2.7, make the following modifications to policy 3.2.3 g):</p> <p>"The Town shall may prepare, from time to time, a Residential Monitoring Report that will be revised and updated, when appropriate, to monitor growth management strategies and maintain a current indicator of the Town's residential market and progress toward the achievement of the affordable housing targets."</p>	<p>Modification required.</p>
<p>3.3 b) iii) Supporting Economic Development – A Viable and Financially Responsible Community (YRPH)</p>	<p>In keeping with YROP policies 5.1.19 and 5.1.20, consider adding reference to local food and/or local food programs to iii., "Promoting local food and food programs and the agriculture industry and associated activities and enhancing their capacity to contribute to the economy of the Town."</p>	<p>Suggested modification.</p>
<p>3.3 – A Viable and Financially Responsible Community</p>	<p>Confirmation is required as to how the NEGOP addresses YROP policy 2.2.12 including the environmental and social component.</p>	<p>Confirmation required.</p>
<p>3.3.1 a) iii) Objectives – A Viable and Financially Responsible Community</p>	<p>In accordance with YROP policy 2.2.11, make the following modification to 3.3.1 a) iii):</p> <p>"Optimize the use of existing infrastructure capacity and investments and promote the coordinated, efficient, and cost-effective delivery of housing options, service infrastructure, and public service facilities that are appropriate for the planned urban structure; and,"</p>	<p>Modification required.</p>

3.4.3 j) Designing with Nature – Good Urban Design – A Beautiful and High Quality Community	YROP policy 2.3.15 g. requires municipalities to review opportunities within existing communities to naturalize and green vacant or underutilized public spaces for public use. As such, an additional policy needs to be added to 3.4.3 j) as follows: “ v. Identify opportunities to naturalize and green vacant or underutilized public spaces for public use ”.	Modification required.
3.4.4 Cultural Heritage Resources	Add policy wording to address YROP policies: <ul style="list-style-type: none"> • 2.4.4: “To require that cultural heritage resources within secondary plan study areas be identified, and any significant resources be conserved.” • 2.4.8 “To ensure that identified cultural heritage resources are evaluated and conserved in capital public works projects.” 	Modifications required.
3.4.4.d. Cultural Heritage Resources – Management, Conservation, and Protection	In keeping with YROP policy 2.4.14, we suggest the following policy be added to 3.4.4.d): “ v. Wherever possible, celebrate archaeological discoveries and/or cultural narratives through innovative architectural and/or landscape architectural design, public art, or other public realm projects, as appropriate. ”	Suggested modification.
3.4.4.h, i, j Cultural Heritage Resources – Archaeological Resources	In keeping with YROP policy 2.4.15, we suggest the following policy be added to 3.4.4: “ The Town, with the advice of a provincially licensed archaeologist, will develop a contingency plan for the protection of archaeological resources in urgent situations, this may include a funding resource to be accessed in emergency situations to protect archaeological resources that are discovered by chance or are under imminent threat. ”	Suggested modification.
3.5 A Healthy Community	An additional subsection is required to address YROP policies 2.3.28 – 2.3.30 and 4.4.24 u. regarding compatibility surrounding sensitive uses, air quality, mitigating risks surrounding odour, noise and other contaminants and required studies.	Modifications required.
3.5.1 a) i. Objectives – A Healthy Community (YRPH)	In support of the wording that the YROP provided (Supporting Complete Communities – p.20) on Health Supportive Tools, we recommend the following wording be added to 3.5.1 a) i.: “Ensure that public health considerations are a crucial part of decision-making when assessing development applications, using health supportive tools where feasible, and that are fully integrated with requirements for equitable access to healthy food, clean air, water, soil, safe environments, and opportunities for physical activity.”	Suggested modification.
3.5.1 a) v. Objectives – A Healthy Community (YRPH)	In keeping with YROP policy 2.3.9, we recommend the following addition to this policy: “Collaborate with York Region in idealizing plans and programs that support active transportation and enhance urban agriculture and access to healthy and locally grown food and agricultural products. ”	Suggested modification.

3.5.2 a) Active Transportation – A Healthy Community	To conform with YROP policy 2.3.18, a policy needs to be added to this section as follows: “new b) Facilities such as covered bicycle storage, lockers and showers are to be implemented, where appropriate, through development approvals to encourage an increase in the mode share of active transportation trips. ”	Modification required.
3.5.2 a) ii. Active Transportation – A Healthy Community (YRPH)	Consider adding the following wording: “Key active transportation routes, such as sidewalks, bike lanes, and multi-use trails will include streetscaping elements that promote pedestrian and cyclist comfort and safety, including separated cycling facilities where feasible, that are designed to enhance accessibility for all residents, and will comply with the Accessibility for Ontarians with Disabilities Act.”	Suggested modification.
3.5.2 c) Urban Agriculture - Active Transportation – A Healthy Community (YRPH)	In support of YROP policies 5.1.19 & 5.1.20, consider adding a reference to support the implementation of York Region’s Agriculture and Agri-food Strategy. Suggested modification is as follows: “3.5.2. c) The Town will support and promote, including the implementation of York Region’s Agriculture and Agri-Food Strategy by: i. Ensuring Farmer’s Markets...”	Suggested modification.
3.6 A Sustainable and Resilient Community (YRPH)	In keeping with YROP policy 5.1.20, there appears to be an absence of any reference to reducing food waste and promoting a circular food economy as a mitigation strategy to reduce carbon footprint. Consider adding supporting wording in this section, such as an added bullet stating, “ Reducing food waste and promoting circular food economy ”.	Suggested modification.
3.6.1 b) i. Objectives - A Sustainable and Resilient Community (YRPH)	Aligning with YROP policies 2.3.22, 2.3.25, 2.3.32, 2.3.33 and 2.3.36, we recommend adding wording to this section that supports the incorporation of adaptation strategies to reduce the impact of climate change on health, such as green infrastructure, street trees and urban forest canopy, especially within areas of increased density. This will help to reduce the climate change impacts related to extreme heat and flooding and is especially important in neighbourhoods with higher rates of vulnerable individuals (those living in affordable housing, seniors, children). Recommended wording addition, “(New Bullet) - Support the incorporation of adaptation strategies to reduce the impact of climate change on health, such as green infrastructure, street trees and urban forest canopy, with a focus within areas of increased density ”.	Suggested modification.

3.6.2 Climate Change Action Plan - Range of Practices – A Sustainable and Resilient Community (YRPH)	YRPH supports climate change mitigation and adaptation policies as they are important for human health. Land use planning which incorporates climate change policies is an important step in protecting our communities and can help to mitigate the impacts of extreme heat events, flooding, and emerging diseases. In keeping with YROP policies 2.3.22, 2.3.25, 2.3.31, 2.3.32, 2.3.33 and 2.3.36 YRPH recommends including the following wording in the Climate Change Action Plan section: “Construction, design measures and green space consideration to mitigate and adapt to the impacts of climate change (e.g., extreme weather, extreme heat).”	Suggested modification.
3.6.2 Climate Change Action Plan - Range of Practices – A Sustainable and Resilient Community	In accordance with YROP policy 2.3.21, add a policy to align with the Regional goal of net-zero emissions by 2050.	Modification required.
3.6.2 p) Urban Forest Resources - Range of Practices – A Sustainable and Resilient Community	<p>Currently, 3.6.2 p) under the subheading “Urban Forest Resources” states, “Within the Mount Albert Greenbelt Settlement Area, and within the Central Growth Area, the Town shall plan to achieve a minimum of 40 percent tree canopy cover by 2051...”.</p> <p>YROP policy 3.4.26, “To increase canopy cover to a minimum of 40% of York Region’s total land area” applies Region-wide, not just to the Mount Albert Settlement Area and within the Central Growth Area. As such a modification is required as follows:</p> <p><i>“Urban Forest Resources</i></p> <p>p) Within the Mount Albert Greenbelt Settlement Area, and within the Central Growth Area, The Town shall plan to assist in achieving the Region-wide target of achieve a minimum of 40 percent tree canopy cover by 2051. To support and increase the existing tree canopy, the Town will preserve, protect, manage, replace, and acquire, where appropriate, tree stands, hedgerows, woodlands, and forested areas within the municipal boundary. The Town...”.</p>	Modification required.
3.6.2 p) Urban Forest Resources - Range of Practices – A Sustainable and Resilient Community	In alignment with YROP policy 3.4.25 “To increase woodland cover to a minimum of 25% of York Region’s total land area”, add a policy to this section to address woodland cover. For information and guidance, the Region’s 2021 State of the Forest report recommends 31% to 33% woodland cover for East Gwillimbury.	Modification required.

3.6.2 p) iv. Urban Forest Resources - Range of Practices – A Sustainable and Resilient Community	The following modification is required resulting from Bill 23: “iv. Requiring compensation for tree removal as a result of development applications to the satisfaction of the municipality Town and Conservation Authority. ”	Modification required.
3.6.2 p) Urban Forest Resources - Range of Practices – A Sustainable and Resilient Community	Add a policy to this section to address YROP policy 3.4.29 "That local municipalities shall develop an Urban Forest Management Plan, together with York Region, that may include additional local woodlands for protection."	Modification required.
3.6.2.s) Green Building - Range of Practices – A Sustainable and Resilient Community	Expand the scope of Town's Thinking Green Development Standards to incorporate elements of renewable and alternative energy, indoor air quality, low impact development, and other sustainable development measures in accordance with YROP policy 2.3.36.	Modification required.
3.6.2 v) iii. Fill and Site Alteration – Range of Practices – A Sustainable and Resilient Community	Modify this policy to address the excess soil best practices from YROP policy 2.5.2: “That local municipalities incorporate best practices for the management of excess soil generated and fill received during development or site alteration, including infrastructure development, within their official plan policies and require measures when assessing development proposals, to ensure that: <ul style="list-style-type: none"> a. Excess soil is reused on-site or locally to the maximum extent possible; b. Excess soil reuse planning is undertaken concurrently with development planning and design where feasible; c. Appropriate sites for excess soil storage and processing are permitted close to areas where proposed development is concentrated or areas of potential soil reuse; and d. The placement of excess soil is located outside of Key Natural Heritage Features and Key Hydrologic Features and fill quality received and fill placement at a site will not cause an adverse effect with regard to the current or proposed use of the property, the natural environment, and is compatible with adjacent land uses; and for lands within the Oak Ridges Moraine Conservation Plan; and, e. In addition to policy 2.5.2 d., fill quality received and fill placement at a site will not cause an adverse effect with regard to cultural heritage resources.” 	Modification required.
4.0 LAND USE POLICIES		
4.1 The Strategic Growth Areas	Consider the addition of a general policy to Section 4.1 to address YROP policy 2.3.54: "To encourage retrofitting, intensification and revitalization, in accordance with policy 2.3.13, when redeveloping existing retail, including major retail sites."	Suggested modification.

4.1 The Strategic Growth Areas	<p>A policy needs to be added to this section to address YROP policy 4.4.5 c) “That local municipal official plans, secondary plans, or other comprehensive plans, and development contemplated within strategic growth areas shall plan for growth consistent with: c) Water, water-wastewater and road infrastructure capacities;”</p> <p>A policy needs to be added to this section to address YROP policy 4.4.13, specifically that development within strategic growth areas shall be prioritized in locations with existing water and wastewater capacity</p>	Modifications required.
4.1 The Strategic Growth Areas	Please confirm how the NEGOP conforms to YROP policy 4.4.15. If it is not addressed, a policy needs to be added to address YROP policy 4.4.15.	Confirmation required and possible modification required.
4.1 The Strategic Growth Areas	We recommend added wording to this section addressing YROP policy 4.4.23 “To encourage tools such as Community Improvement Plans to encourage office and affordable housing including purpose-built rental housing within strategic growth areas and to help improve economic activity and vitality.”	Suggested modification.
4.1 The Strategic Growth Areas	Please confirm how the NEGOP addresses YROP policy 4.4.51 “That local municipalities shall identify locations within Local Corridors where the missing middle can be accommodated”. Modification will be required if this is not addressed.	Confirmation and possible modification required.
4.1.1.c The Strategic Growth Areas	<p>YROP policy 4.4.11 requires local municipalities to develop local municipal intensification hierarchies and identify minimum density and height targets for Strategic Growth Areas in a manner that consistent with Regional and local municipal intensification hierarchies. Please update the NEGOP to include this hierarchy, densities and targets.</p> <p>4.1.1.c speaks to a hierarchy of designations in the Strategic Growth Areas, however we were unable to clearly identify the hierarchy in the NEGOP. Ensure the NEGOP includes a hierarchy consistent with YROP policy 4.1.3.</p> <p>Additional YROP policies regarding the Regional hierarchy and intensification targets that need to be addressed include:</p> <ul style="list-style-type: none"> • Policy 4.4.1: “That intensification be directed in accordance with the Regional hierarchy outlined in policy 4.4.2 to utilize land efficiently and sustainably that is commensurate with available hard and soft services and existing infrastructure, while having regard for the local context.” 	Modifications required.

	<ul style="list-style-type: none"> • Policy 4.4.4: “To prioritize intensification in strategic growth areas and establish a scale of development that reflects the Regional intensification hierarchy as set out in policy 4.1.3 of the Plan as implemented through local official plans. • Policy 4.4.5 a) “That local municipal official plans, secondary plans, or other comprehensive plans, and development contemplated within strategic growth areas shall plan for growth consistent with: a) The Regional intensification hierarchy outlined in policy 4.1.3;” • Policy 4.4.10 b, c, and f) “That local municipalities shall complete and adopt intensification strategies based on the policies of the Plan. The local municipal intensification strategies, developed in cooperation with York Region, shall: b) Identify the role and planned function of each strategic growth area in conformity with the Regional intensification hierarchy in policy 4.1.3; c) Identify the planned residents and jobs target for each strategic growth area; f) Identify implementation policies and strategies to prioritize, phase in and achieve local municipal intensification targets in local official plans.” • Policy 4.4.12 “That strategic growth area density targets apply to the entirety of the area within the boundary delineation, not individual parcels.” • Policy 4.4.3.8 “That the built form and scale of development within major transit station areas shall further support and implement the Regional intensification hierarchy outlined in policy 4.1.3 in accordance with the intensification level determined by the minimum density targets in Appendix 2.” • Policy 4.4.44 “That development applications along Regional Corridors outside of MTSA’s shall have regard to local context and impact on achieving the Regional intensification hierarchy outlined in policy 4.1.3.” 	
4.1.3.3. c. and j. Development Policies – Village Core Area Designation	In keeping with YROP policy 2.3.15 e., apply these policies within East Gwillimbury’s existing communities, beyond the Village Core Designation.	Modification required.
4.2 Community Areas	<p>A section needs to be added to 4.2 to address New Community Area and phasing requirements as outlined in the YROP. YROP policies that need to be addressed include but are not limited to: 2.2.5, 4.2.8, 4.2.10, 4.2.11, 4.2.12, 4.2.13, 4.2.14, 4.2.16, 4.2.19, 4.2.20, 4.2.22, 4.2.23, 4.2.24, 4.2.26, 4.2.27, 4.2.28, 4.2.29.</p> <p>In accordance with YROP policy 4.2.10, secondary plans are required for New Community Areas as identified on YROP Map 1B. These areas are to be shown on the NEGOP Schedules.</p>	Modifications required.
4.2.8.2 Permitted Uses - Park and Open Space Designation and Symbols	In keeping with YROP policies 2.3.9, 2.3.10, 5.1.20 and 6.7.7, consider adding “ Community garden ” as a permitted use.	Suggested modification.

4.2.8.5 a) Area Specific Policies - Park and Open Space Designation and Symbols	We recommend this policy be relocated to Section 4.4.3 - The Environmental Protection Designation and the following modification be made to address changes resulting in Bill 23: “Within the Green Lane Secondary Plan Area, shown on Schedule 3D, community gardens may be permitted in the Environmental Protection Designation, but outside of natural heritage features, subject to the approval of the municipality Town and the Conservation Authority. ”	Suggested and required modification.
4.3 The Employment Areas	Policies need to be added to this section to address YROP policies 4.3.19, 4.3.20, 4.3.25, 4.3.26, 4.3.27, and 4.3.30.	Modifications required.
4.3 The Employment Areas	We recommend adding wording to this section to address YROP policy 4.3.9 recognizing the importance of transit in talent and business attraction by aligning current and planned transit service investments with current and planned Employment Areas.	Suggested modification.
4.3.2.a General Policies	Development on fully serviced employment lands shall be compact and achieve an average minimum density of 55 jobs per gross hectare in the developable area, with the exception of the Holland Landing Prestige Employment Area (as identified on Schedule 3A), which shall achieve an average minimum density of 25 jobs per gross hectare. Employment density targets outlined in this policy appear to be inconsistent with NEGOP policy 2.3.e.	Modification required.
4.3.2.f General Policies	Policy 4.3.2 f) must be modified to address YROP 4.3.14 “That the following uses shall not be permitted in Employment Areas identified on Map 1A: a. Residential; b. Long-term care homes; c. Retirement homes; d. Boarding schools; and e. Other uses where individuals reside on a temporary or permanent basis, excluding hotels.”	Modification required.
4.3.2 General Policies	Update this section to address YROP policy 4.3.15 “That, in addition to the uses listed in policy 4.3.14, the following uses shall not be permitted in <i>core employment areas</i> : a. <i>Major retail</i> ; b. Institutional uses; and c. Retail uses that are not <i>accessory</i> .”	Modification required.
4.3.2 General Policies	YROP policy 4.3.16 states that expansions to existing uses in Employment Areas established prior to the date the Plan came into effect and that do not conform with policies 4.3.14 and 4.3.15 are discouraged, and if they do occur shall have regard for existing adjacent Employment Areas. Please include a policy in this section reflective of this.	Modification required.
4.3.2 General Policies	Confirmation is required as to how the policies of this section address the requirements of the YROP policy 4.3.17 specifically related to threshold, amount and size of major retail and ancillary retail uses in supporting employment areas. If it is not addressed, a policy should be added to address YROP policy 4.3.17.	Confirmation required. Possible modification.

4.3.2 General Policies	We recommend added wording to this section addressing YROP policy 4.3.29 that encourages local municipalities to use tools such as Business Improvement Areas or Community Improvement Plans to promote redevelopment and improvements to built form and accessibility in Employment Areas.	Suggested modification.
4.3.2 General Policies	<p>Policies need to be added to this section to address YROP policies 4.3.22 and 4.3.28 regarding the development of secondary plans and urban design guidelines for new Employment Areas.</p> <p>YROP policy 4.3.22: “That local municipalities, in consultation with York Region, prepare secondary plans or equivalent comprehensive planning studies for new Employment Areas that meet or exceed the minimum density targets in Table 5 and in accordance with applicable policies of the Plan.”</p> <p>YROP policy 4.3.28: “To require local municipalities to develop urban design guidelines as part of secondary plans or alternative comprehensive plans for new Employment Areas. Local municipalities are encouraged to refer to York Region’s New Communities Guidelines and policy 2.3.13 of the Plan when developing urban design guidelines.”</p>	Modification required.
4.3.2 General Policies	Provide confirmation as to how the NEGOP addresses YROP policy 4.3.23 “To encourage local municipalities to update existing secondary plans and/or redevelopment plans to meet or exceed the minimum density targets in Table 5, where possible given the local context and in accordance with other applicable policies of the Plan.” If it is not addressed, a policy should be added to address YROP policy 4.3.23.	Confirmation required. Possible modification required.
4.4 The Natural Heritage System	See comments provided by the LSRCA. We support these comments and require they be addressed as outlined below.	For information.
4.4 The Natural Heritage System	In accordance with YROP policy 3.4.4, list the key natural heritage features and key hydrologic features as identified in YROP policy 3.4.1. Definitions for these key natural heritage features and key hydrologic features need to be consistent with the definitions in the YROP. Criteria for significant woodlands shall be consistent with YROP policies 3.4.30 and 3.4.31. As stated above, consider an additional heading in Section 4.4 to address key natural heritage features and key hydrologic features policies.	Modifications required.
4.4 The Natural Heritage System	Identify missing components of the Water Resource System (Key Hydrologic Features including wetlands and Significant Surface Water Contribution Areas are missing from the Schedules) and include policies to protect, improve or restore the system in accordance with YROP policies 3.1.3, 3.1.4, 3.3.4, 3.3.6 and 3.3.9.	Modifications required.

4.4 The Natural Heritage System	Confirmation is required as to how the NEGOP addresses YROP policies 3.4.4 and 3.4.5. A policy that generally prohibits development and site alteration within key natural heritage features, key hydrologic features, vegetation protection zones and adjacent lands needs to be added, as per YROP policy 3.4.5. Consider an additional heading in Section 4.4 to address key natural heritage features and key hydrologic features policies.	Confirmation required. Possible modification.
4.4 The Natural Heritage System	A policy needs to be added to Section 4.4 to address YROP policy 3.4.17. Consider adding this policy under a new heading in Section 4.4 that addresses natural heritage features and key hydrologic features policies.	Modification required.
4.4 The Natural Heritage System	Confirmation is required as to how YROP policy 3.4.18 is addressed in the NEGOP. If it is not addressed, a policy needs to be added to address YROP policy 3.4.18.	Confirmation required. Possible modification.
4.4 The Natural Heritage System	Add policies to Section 4.4 to address YROP policies 3.4.19, 3.4.20, 3.4.21, 3.4.22, 3.4.27 and 3.4.32.	Modifications required.
4.4.2.1.a.i Upper Tier Policies / Jurisdiction - General Policies for the Natural Heritage System	4.4.2.1.a.i. Replace "hydrologically sensitive features" with "key hydrologic features".	Modification required.
4.4.2.2 a) Natural Heritage Evaluation	In response to Bill 23 changes, the following modification is required: "Where development and/or site alteration is proposed that is in or within 120 metres, or affects the Natural Heritage System, the Town shall require that a Natural Heritage Evaluation be prepared by a qualified professional with appropriate in-season field work, and in accordance with the requirements of the municipality Town , the Conservation Authority , and any agency having jurisdiction. The Natural Heritage Evaluation shall demonstrate that there will be no negative impacts on any natural heritage features or their ecological functions, to the satisfaction of the municipality Town , in consultation with the Conservation Authority and any agency having jurisdiction."	Modification required.
4.4.2.2 b) Natural Heritage Evaluation	The YROP policy 3.4.13 includes vegetation protection zone minimum widths. Consider including a similar table in the NEGOP.	Suggested modification.
4.4.2.2 c) Natural Heritage Evaluation	In response to Bill 23 changes, the following modification is required: "As part of any Natural Heritage Evaluation the boundaries of the features within the Natural Heritage System will be staked in the field and approved by the Town municipality in consultation with the Conservation Authority, as permitted . Provincially Significant Wetlands and Significant Habitat of Endangered and Threatened Species shall be surveyed in consultation with the Provincial agency having jurisdiction, in addition to the Conservation Authority and the Town.	Modification required.

4.4.2.2 e) Natural Heritage Evaluation	In response to Bill 23 changes, the following modification is required: “Where an application for development and/ or site alteration is in or within 120 metres or affects the Natural Heritage System and is of a minor nature, the municipality Town, in consultation with the Conservation Authority, or any other agency having jurisdiction, may reduce the scope of the study requirements for a Natural Heritage Evaluation.”	Modification required.
4.4.2.2 f) Natural Heritage Evaluation	In response to Bill 23 changes, the following modification is required: “Opportunities for enhancements and linkages will be identified and addressed through the preparation of any required Natural Heritage Evaluation or Hydrologic Evaluation a part of any development application, in consultation with the Conservation Authority, York Region, and/or Province, and implemented through development agreements.”	Modification required.
4.4.2.2 g) Natural Heritage Evaluation	In response to Bill 23 changes, the following modification is required: “An environmental education/awareness program that informs homeowners of the environmental sensitivities within the Town shall be prepared by a development proponent(s) to the satisfaction of the municipality Town in consultation with the Conservation Authority. Preparation of this program shall be addressed though the subdivision approval process and will include recommendations from the approved Natural Heritage Evaluation.	Modification required.
4.4.3.2.a.ii Components – The Environmental Protection Designation	Please verify the components of the Greenbelt Plan Area that are included in the Town's Environmental Protection Designation.	Confirmation required.
4.4.3.2.a.iv Components – The Environmental Protection Designation	Consider using the Official Plan 'Year' instead of 'Existing'.	Suggested modification.
4.4.3.4.c Development Policies – The Environmental Protection Designation	In keeping with YROP policy 3.2.3, consider adding a policy that generally prohibits development and site alteration within the Environmental Protection Designation and outlines permitted uses as per YROP policy 3.2.5.	Suggested modification.
4.4.3.4 b) Restoration Area – The Environmental Protection Designation	In response to Bill 23 changes, the following modification is required: “The Restoration Area shown on Schedule 3D shall be restored as part of the Natural Heritage System and may be used as compensation, as approved by the municipality Conservation Authority, for refinements of features and buffers in other areas of the Green Lane Secondary Plan Area.”	Modification required.

4.4.3.4 g) Compensation Where Impact Unavoidable – The Environmental Protection Designation	In response to Bill 23 changes, the following modification is required: “Where development and/or site alteration is necessary within the Environmental Protection Designation, and a negative impact is unavoidable, as identified through a Natural Heritage Evaluation, then the Town, in consultation with the Conservation Authority and any agency having jurisdiction, may accept a compensatory mitigation approach. Where compensatory mitigation is proposed, it must be demonstrated through a Natural Heritage Evaluation that the mitigation results in no net loss of the natural heritage features and/or their supporting ecological functions”.	Modification required.
4.4.3.4 i) Existing Uses and Structures – The Environmental Protection Designation	In response to Bill 23 changes, the following modification is required: “Legally existing uses and/or structures within the Environmental Protection Designation are permitted and may be replaced if destroyed by natural causes. An application for the expansion or enlargement of such uses and/or structures may be considered subject to the submission of a Natural Heritage Evaluation and Site Plan Approval, where required , to the satisfaction of the municipality Town , in consultation with the Conservation Authority and any other agency having jurisdiction. The application shall demonstrate no negative impact to the natural heritage features and/or their supporting ecological functions, and may also require an application for rezoning.”	Modification required.
4.4.3.4 l) Removal or Destruction of a Natural Feature – The Environmental Protection Designation	In response to Bill 23 changes, the following modification is required: “The removal or destruction of any natural heritage feature, trees, woodlots, or any associated ecological function by unauthorized development, tree cutting, or site alteration of any kind is prohibited. Such removal or destruction will not provide the rationale for the removal of these lands from the Environmental Protection Designation. Restoration, to the satisfaction of the municipalities Town , in consultation with the Conservation Authority and any other agency having jurisdiction, will be required where the removal or destruction of a significant natural heritage feature or any associated ecological function by unauthorized development or site alteration has occurred. Charges or penalties may be imposed pursuant to a Site Alteration By-law or Tree Cutting By-law.”	Modification required.
4.4.3.4 o) Changes to the Boundaries of the EP Designation – The Environmental Protection Designation	In response to Bill 23 changes, the following modification is required: “Minor adjustments to the boundary of the Environmental Protection Designation may be facilitated through a Natural Heritage Evaluation without the need to amend this Plan. Where a minor adjustment to the boundary of the Environmental Protection Designation is approved by the municipality Town , in consultation with the Conservation Authority and any other agency having jurisdiction, the abutting land use designation as identified on Schedule 4, shall apply.”	Modification required.
4.4.8.3 Development Policies - Policies for Hazard Lands	Add a policy to this section to address YROP policy 3.5.2 “That development be planned and designed to demonstrate no negative flooding and erosion impacts.”	Modification required.

<p>4.4.8.3 Development Policies - Policies for Hazard Lands</p>	<p>Add policies to this section to address YROP policy 3.5.5 b), c) and e) and policy 3.5.6: Policy 3.5.5: “To require local official plans and zoning by-laws to contain policies, provisions and/or mapping to: b) Identify permitted uses and the requirement for setbacks or buffers; c) Address land use within and adjacent to hazardous lands and hazardous sites; e) Address wildland fire hazard.” Policy 3.5.6: “To require setbacks, buffers and/or access allowance from hazardous lands and hazardous sites based on a minimum buffer where defined by the local municipality in consultation with the conservation authority, or such distance as may be determined through technical studies or to conform to Provincial regulations. Where hazardous lands and hazardous sites have been defined to include setbacks, buffers and/or access allowance, the Plan shall not require additional lands.”</p> <p>Current NEGOP policies regarding land adjacent to hazardous lands, setbacks and buffers only apply to lands adjacent to a watercourse. Please add policies to address land adjacent to additional hazardous lands and sites.</p>	<p>Modification required.</p>
<p>4.4.8.3 Development Policies - Policies for Hazard Lands</p>	<p>Consider the addition of a policy to align with YROP policy 3.5.8. “That local municipalities partner with conservation authorities to identify remediation and mitigation opportunities for hazardous lands and hazardous sites.”</p>	<p>Suggested modification.</p>
<p>4.4.8.3 Development Policies - Policies for Hazard Lands</p>	<p>Consider the addition of a policy to align with YROP policy 3.5.9 “That the dedication of hazardous lands and hazardous sites to public agencies through the development approvals process be encouraged. Where hazardous lands and hazardous sites are held in private ownership, nothing in the Plan requires that these lands be free and available for public use.”</p>	<p>Suggested modification.</p>
<p>4.4.9 Heading - Policies for Groundwater and Aquifer Protection (WRS)</p>	<p>While the heading was changed the word “quality” was used. Please remove “quality” and replace with “quantity” to read, “Policies for Aquifer and Groundwater Quality Quantity Protection”</p>	<p>Modification required.</p>
<p>4.4.9.2 Policies - Policies for Groundwater and Aquifer Protection</p>	<p>Further clarification is required as to how the NEGOP addresses YROP policy 3.3.9. Significant Surface Water Contribution Areas must also be addressed to align with YROP policy 3.3.9.</p>	<p>Clarification and modification required.</p>
<p>4.4.9.2 Policies - Policies for Groundwater and Aquifer Protection (WRS)</p>	<p>In this section the following subheading (<i>Groundwater Recharge Areas</i>) should be changed to “Recharge Management Area (WHPA – Q) and Significant Groundwater Recharge Area (SGRA)”.</p>	<p>Modification required.</p>

4.4.9.2 a) b) and c) Policies - Policies for Groundwater and Aquifer Protection (WRS)	Replace “Rechargeable” with “Recharge”.	Modification required.
4.4.9.2 a) – Policies – Wellhead Protection Quantity Areas - Policies for Groundwater and Aquifer Protection	In accordance with YROP policy 3.3.7, make the following modification to 4.4.9.2 a): “Any application for development and site alteration major development within the Rechargeable Management Area (WHPA-Q) and Significant Groundwater Recharge Area (SGRA) identified on maps provided in Appendix I, shall be accompanied by a Water Balance Plan that will maintain pre-development recharge rates to the fullest-greatest extent possible through best management practices.”	Modification required.
4.4.9.2. c) i. – Policies – Wellhead Protection Quantity Areas - Policies for Groundwater and Aquifer Protection (WRS)	In keeping with our previous comments, Water Resources recommends the removal of this policy item as it is a duplication of provincial requirements and may cause confusion. The policy does not adequately reflect the Source Protection Plan requirements. The policy instead relates to a prescribed instrument implemented by the Ministry. 4.4.9.2 c) Proposals for major development within the Rechargeable Management Area (WHPAQ) and Significant Groundwater Recharge Area (SGRA) are permitted if: i. The Province determines that the new or amended Permit to Take Water required for the development to proceed will not result in a significant drinking water threat.	Modification required.
4.4.9.2.h) – Policies – Highly Vulnerable Aquifers	Add Significant Surface Water Contribution Areas to the locations where these best management practices apply.	Modification required.
4.5 The Agricultural and Rural System	<ul style="list-style-type: none"> • In section 4.5.1, more wording is needed to reflect the “Agricultural System” and the supporting policies found in section 5.1 of the YROP. • An additional subsection is needed in 4.5.1 for “General Policies” related to the Agricultural System (Agricultural, Rural, and Specialty Crop Areas) that includes wording related to YROP policies: <ul style="list-style-type: none"> a. 5.1.6 a. – e. regarding sustainable agricultural practices and the implementation of best management practices. b. 5.1.7 a. – c. regarding non-agricultural uses c. 5.1.8 regarding edge planning d. 5.1.9 a. – f. regarding the redevelopment on non-agricultural uses e. 5.1.10 a. – c. regarding new and expanding infrastructure f. 5.1.11 regarding existing institutional uses on the ORM g. 5.1.12 a. – f. regarding consents. Please note the consent policies in sections 4.5.3 & 4.5.4 do not fully address/ conform with this YROP policy. 	Modifications required.

	<ul style="list-style-type: none"> h. 5.1.13 regarding new multiple lots or units i. 5.1.19 regarding refinements to the Agricultural or Rural areas (MCR). j. 5.1.20 & 5.1.21 regarding agri-food and economic prosperity of the agricultural/ agri-food sector. 	
4.5.2.1 a) Intent – Hamlet Designation	Wording in this policy need updating to include reference to ORMCP Hamlet policies and the NEGOP’s “ORM Hamlet” designation for Holt.	Modification required.
4.5.2.2 a) Permitted Uses – Hamlet Designation	<p>YROP policy 5.4.4 small-scale residential, industrial, commercial, institutional, and recreational uses and may be permitted within Hamlets. The Town may wish to consider expanding the permitted uses in Hamlets in keeping with this YROP policy.</p> <p>The following modifications are required to this policy: “Land designated Greenbelt Hamlets and ORM Hamlet may be zoned to permit:</p> <ul style="list-style-type: none"> i. Single detached dwellings; ii. Small scale commercial uses; and, iii. Small scale Institutional uses. 	Suggested modifications and Modification required.
4.5.2.3 a) i) – Development Policies – Hamlet Designation	<p>In keeping with YROP policies 5.4.3, 5.4.4, the following modifications are required: “Only minor infilling for small-scale residential, industrial, commercial, institutional, and recreational uses, and extensions/ enlargements of existing uses will be permitted within the Hamlets of Ravenshoe, Holt, and Brown Hill...”</p>	Modification required.
4.5.2.3 a) i) – Development Policies – Hamlet Designation (IAM)	<p>The circumstances under which communal private water and wastewater servicing systems are permitted need to conform with YROP policies 6.4.7. & 6.4.8. Specifically, the YROP only permits private communal systems only where the protection of public health is an issue in areas of existing groundwater contamination or for new employment growth and on an interim basis in areas where full municipal water and wastewater services are planned but not currently available.</p> <p>As such, the following modifications are needed to this policy: “Be accompanied by an engineering report which confirms that there is: > An adequate supply of potable water and soil conditions satisfactory for the effective operation of communal or private sewage systems, consistent with current Provincial guidelines; > The system will only be permitted if it can be demonstrated there are no adverse effects impacts from the proposed development as it is related to water and soil contamination on soil, surface or groundwater quality and quantity, and in accordance with applicable policies in the South Georgian Bay Lake Simcoe Source Protection Plans...”</p>	Modification required.

4.5.2.3 a) iv) – Development Policies – Hamlet Designation	Expand wording to be more in keeping with YROP policy 5.4.5 ensure that development in Hamlets shall be of an appropriate size and scope to ensure compatibility with the surrounding community in the context of use of land, buildings and structure size, area, density, and height.	Required modification.
4.5.3.1 Intent – Prime Agricultural Area Designation (YRPH)	In keeping with YROP 2022 policy 5.1.20 consider adding, “ Work with York Region to implement the York Region Agriculture and Agri-Food Strategy ”.	Suggested modification.
4.5.3.2 Permitted Uses in Prime Agricultural Area – Prime Agricultural Area Designation	<ul style="list-style-type: none"> • This list of permitted uses needs to be amended to include “Normal farm practices and agricultural uses”, both defined terms in the YROP (YROP 5.1.4). • While “Additional Residential Units” are listed as permitted uses in the Agricultural area, there needs to be additional policies in NEGOP section 4.5.3.3 – Development Policies that addresses YROP policy 5.2.5 which only allows one accessory residential unit within the primary dwelling in the Agricultural and Rural Areas. Further, the ORMCP contains policies limiting where secondary units are allowed. • Further YROP policy 5.2.6 allow for additional residential structures for farm help, subject to criteria. Confirmation is required as to whether the Town includes farm-help dwellings as “additional residential units” or if they need to be added as a separate permitted use in this section. If so, additional supporting policies reflecting the YROP will be required. 	Modification required. Confirmation required/ possible further modification needed.
4.5.3.3 Development Policies – Prime Agricultural Area Designation	<ul style="list-style-type: none"> • Policies 11 (4) and 12 (4) of the ORMCP only allow on-farm diversified uses and agriculture-related uses in prime agricultural areas in the Natural Core and Natural Linkage Areas. We suggest that a related policy be included in this section. 	Suggested modification.
4.5.3.3 Development Policies - Compatibility in the Prime Agricultural Area	<ul style="list-style-type: none"> • Additional wording is required in this section reflecting YROP policy 5.1.5 which states, “That agricultural uses, agriculture-related uses and on-farm diversified uses shall be permitted in accordance with Provincial guidelines, as further defined through local official plan policies. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations.” • Policies of this section need to be updated to fully address YROP policy 5.1.7 a. – c. (non-agricultural uses in the Agricultural System. Consider moving these policies to the new subsection in 4.5.1. 	Modifications required.
4.5.3.3 g) Development Policies – Secondary Uses in the Prime Agricultural Area	<ul style="list-style-type: none"> • Confirmation is required from the Town as what is considered a “non-farm lot” in the prime agricultural area designation and what the intent of this policy is as there are concerns regarding potential non-conformity, particularly related to “agricultural related uses “and “farm employee accommodations” and YROP policies 5.2.6 and 5.2.7. 	Further discussion and confirmation required. Possible modifications required

4.5.3.3 k) Extensions/Enlargements to Existing Uses in the Prime Agricultural Area	This wording in this policy needs to be amended to reflect the wording in YROP policy 5.1.15, which states, that any proposed expansions or alterations to existing buildings and structures for agricultural uses, agriculture-related uses or on-farm diversified uses within key natural heritage features and/or key hydrologic features and their associated vegetation protection zones are required to meet the applicable policies.	Modifications required.
4.5.3.3 l) Lot Creation in the Prime Agricultural Area	<ul style="list-style-type: none"> • Remove “within the” in the heading of this subsection. • Reflective of YROP policies 5.2.6, 5.2.7, 5.1.13, additional policies are needed in this section as follows: <p>“A consent to sever additional residential structures for farm help/ farm employee accommodations from the main agricultural use is prohibited.”</p> <p>“A consent for an agriculture-related use is not permitted within the Oak Ridges Moraine Conservation Plan Area.”</p> <p>“That new multiple lots or units for residential development (e.g. estate residential subdivisions and adult lifestyle or retirement communities), whether by plan of subdivision, condominium or severance, shall not be permitted.”</p> • In keeping with the comments for 4.5.1, the policy wording of this section needs to be updated to fully reflect policy 5.1.12 a. – e. • Policies of this section also need to be updated to reference and reflect the lot creation policies in the Greenbelt Plan, and specifically related to lot creation in the agricultural area. 	Modifications required.
4.5.4.1 Intent – Rural Area Designation	With the Province’s approval of the YROP, Section 4.6 - Future Urban Areas was removed from the YROP as well as removed from all YROP Maps. To address conformity with the YROP, this policy referencing “Future Urban Areas’ and “Future Urban Employment Areas” in the EG OP and on the Schedules needs to be removed.	Modification required.
4.5.4.2 Permitted Uses – Rural Area Designation	<ul style="list-style-type: none"> • While “Additional Residential Units” are listed as permitted uses in the Rural area, there needs to be additional policies in NEGOP section 4.5.4.3 – Development Policies that addresses YROP policy 5.2.5 a) which only allows one accessory residential unit within the primary dwelling in the Agricultural and Rural Areas. Further, the ORMCP contains policies limiting where secondary units are allowed. • Updated uses and wording of 4.5.4 b) is needed to comply with YROP policy 5.3.2 a. – d. 	Modifications required.

4.5.4.3 Compatibility in the Rural Area	<ul style="list-style-type: none"> Additional wording is required in this section reflecting YROP policy 5.1.5 which states, “That agricultural uses, agriculture-related uses and on-farm diversified uses shall be permitted in accordance with Provincial guidelines, as further defined through local official plan policies. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations.” 	Modification required.
4.5.4.3 Development Policies – Holland Marsh Speciality Crop Area Designation	<ul style="list-style-type: none"> Additional wording is required in this section reflecting YROP policy 5.1.5 which states, “That agricultural uses, agriculture-related uses and on-farm diversified uses shall be permitted in accordance with Provincial guidelines, as further defined through local official plan policies. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations.” 	Modification required.
4.5.5.2 Permitted Uses/ Prohibited Uses – Holland Marsh Specialty Crop Area	<p>As per YROP policy 5.2.4, the following policy is required in this section: “To discourage the use of the Holland Marsh Specialty Crop Area for uses that do not require its muck soils for food production.”</p>	Modification required.
4.5.6.3 a) Development Policies – Recreation Area Designation	<p>This policy in the EG OP currently states, “The development of new recreational uses and expansions to existing uses within the <u>Rural Area Designation</u> may be considered, subject to an Agricultural Impact Assessment in support of an Amendment to this Plan, an Amendment to the Zoning By-law, and the submission of appropriate studies that demonstrate to the satisfaction of the Town that:...”.</p> <p>Confirmation is required as to why this policy is referencing the “Rural Area Designation” in the Recreation Area Designation.</p>	Clarification required. Possible modification needed.
4.5.7 Waste Disposal Site Designation	<p>YROP policy 6.6.7 requires local official plans to identify all known closed and active waste disposal facilities and provide policies for development within or on lands in close proximity to such sites, and their future rehabilitation, in accordance with provincial guidelines. The location of closed landfill sites in EG are identified on Schedule 5 and this section contains policies addressing development within or adjacent to those sites.</p> <p>However, NEGOP policy 4.5.7 b) states that “The location of closed landfill sites are indicated on Schedule 5 based on information provided by the Province, <u>with the exception</u> of one area known as waste disposal site #7017, in Lot 7, Plan 143 and located on the west side of Yonge Street, which is not shown on a Schedule. The extent and exact location of any other former Waste Disposal Sites shall be determined in consultation with the Province”.</p> <p>At minimum, waste disposal site #7017 should be shown as a symbol on Schedule 5 with wording in this section indicating its exact location and extent is yet to be determined. Further, the last sentence of 4.5.7 b) makes it sound</p>	Modification required.

	<p>like there is potentially other sites located in EG. This should be confirmed with the Province prior to the OP being finalized or this policy should be reworded to indicate that should any other former waste disposal site be identified by the province in the future, the plan will be updated accordingly.</p>	
<p>4.5.8.3 Development Policies – Aggregate Extraction Area</p>	<ul style="list-style-type: none"> • Policy wording is required in this section addressing YROP policy 5.5.3 which states, “That existing mineral aggregate operations shall be permitted to continue without the requirement of an official plan amendment, zoning by-law amendment or development permit under the Planning Act”. • Policy wording is required in this section addressing YROP policy 5.5.4 which states, “That mineral aggregate operations shall be protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact.” • As per YROP policy 5.5.5, the following policy is required, “That only processes under the Aggregate Resources Act shall address the depth of extraction of new or existing mineral aggregate operations.” • In keeping with YROP policy 5.5.11, a general policy be including in this section as follows, “That extraction and processing activities be conducted in a manner that minimizes negative environmental, economic and social impacts, in accordance with all government legislation, standards and policies.” • In keeping with YROP policy 5.5.12, additional policy wording is required to reflect YROP policy 5.5.12 regarding the minimizing of adverse effects and supporting the use of alternative material to sand and gravel to assist with the conservation of existing aggregate supplies. • Policy wording is required in this section addressing YROP policy 5.5.13 which states, “That mineral aggregate resource conservation shall be undertaken, including through the use of accessory aggregate recycling facilities within operations, wherever feasible.” • Further, an additional policy is needed that addresses YROP policy 5.5.14 that requires local municipalities to develop and implement official plan policies and other strategies to conserve mineral aggregate resources including the recovery and recycling of manufactured materials derived from mineral aggregate resources and utilization or extraction of on-site mineral aggregate resources prior to development. • While NEGOP policy 4.5.8 k) includes mineral aggregate policies for the Oak Ridges Moraine, a general policy should be included reflective of YROP policy 5.5.17 which states, “That policies and provisions in the Provincial Policy Statement, the Growth Plan, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Lake Simcoe Protection Plan shall be complied with in regard to new and existing mineral aggregate operations and wayside pits for the proper extraction and rehabilitation of sites.” • Policies need to be added to this section reflective of YROP policies 5.5.21 and 5.5.22 regarding petroleum resources and oil, gas and salt hazards. 	<p>Modifications required.</p>

4.5.8.3 d) Development Policies – Aggregate Extraction Area	This policy needs to be amended to include YROP policy 5.5.7 d. as follows: “ iv. Any key natural heritage features and key hydrologic features and their associated vegetation protection zones will be addressed. ”	Modifications required.
4.5.8.3 e) Mineral Aggregate Operations in the Prime Agricultural Area Designation – Aggregate Extraction Area	As per YROP policy 5.5.16, the following modifications are required: “In the Prime Agricultural Area Designation, extraction of mineral aggregates is permitted as an interim use, in accordance with the policies of this Plan, provided it is supported by an Agricultural Impact Assessment and that rehabilitation of the site...”. “e) i. There is a substantial quantity of mineral aggregates below the water table warranting extraction or the depth of planned extraction in a quarry makes restoration of pre-extraction agricultural capability unfeasible, and where other alternatives have been considered by the applicant and found unfeasible in accordance with the Provincial Policy Statement;	Modifications required.
4.5.8.3 f) Mineral Aggregate Operations in the Environmental Protection Designation	YROP policy 5.5.10 requires, “To permit portable asphalt plants, wayside pits and quarries used on public authority contracts, in consultation with local municipalities, without requiring an official plan amendment or zoning by-law amendment, <u>except within the Regional Greenlands System</u> as identified in policy 5.5.20 of the Plan. A zoning by-law amendment shall be required to permit such facilities in areas of existing development.” YROP policy further outlines where in the Regional Greenlands System within the Greenbelt Plan Area and the LSPP Areas that no new mineral aggregate operations, wayside pits and/or quarries, or any ancillary or accessory uses thereto are permitted within the certain listed key natural heritage features and key hydrologic features. The wording of these policies must be amended to correctly reflect these YROP policies as they currently only relate to the EP Designation.	Modification required.
4.5.8.3 i) Landform Conservation Area in the Oak Ridges Moraine - Aggregate Extraction Area Designation	We recommend this policy be moved to a more appropriate section as these ORM policies apply in all other designations on the Oak Ridges Moraine in areas identified as Landform Conservation Area 1 or 2. “ With the exception of mineral aggregate operations, applications for development or site alteration in any area identified as a Landform Conservation Area Category 1 or 2 on mapping in Appendix I shall identify planning, design, and construction practices in conformity with the policies for the applicable Landform Conservation Area category that keep disturbance of landform character to a minimum, in accordance with the relevant provisions of the Oak Ridges Moraine Conservation Plan, to the satisfaction of the Town and the Conservation Authority ”.	Modification required.
4.5.8.3 k) Mineral Aggregate Operations in the Oak Ridges Moraine	In keeping with YROP policy 5.5.19 the following modification is required:	Modification required.

- Aggregate Extraction Area Designation	“Mineral aggregate operations and wayside pits shall only be permitted in Natural Linkage Area designation for lands on the Oak Ridges Moraine in accordance with:..”	
4.6.1 a) Land Uses Permitted in All Designations – Land Use Specific Policies	Regarding infrastructure uses, and where they are permitted, consider rewording this policy to be more in keeping with wording of YROP policy 6.3.51.	Suggested modification.
4.6.1 b) Land Uses Permitted in All Designations – Land Use Specific Policies	In response to Bill 23 changes, the following modification is required: “Notwithstanding a) above, parks and open spaces and open space linkages/trails and municipal sewer and water services may be permitted within the Environmental Protection Designation, subject to the relevant policies of this Plan, including demonstration of no negative impacts on natural heritage features, functions, linkages and connections, to the satisfaction of the municipalities Town , in consultation with the Conservation Authority, where permitted , and any other government agency having jurisdiction.”	Required modification.
4.6.3.4 Schools – Land Use/ Built Form Specific Policies – Land Use Specific Policies	In keeping with ROP policy 2.3.12 d., the following policy should be updated as follows: “a) x. Within strategic growth areas, the incorporation of vertical schools or urban schools into the base of multi-storey buildings be allowed in consultation with the school boards. ”	Required modification.
4.6.3.5 Additional Residential Dwelling Units	Policies in this section need to be updated to: <ul style="list-style-type: none"> • Reflect the recent Bill 23 changes regarding Additional Dwelling Units. • YROP policy 5.2.5 which only allows one accessory residential unit within the primary dwelling in the Agricultural and Rural Areas. • The ORMCP contains policies limiting where secondary units are allowed, specifically as outlined in the ORMCP’s definition of “Single dwelling” which means “a building containing only one dwelling unit and, in any area other than an area within a Natural Core or Natural Linkage Area, includes a building containing one primary dwelling unit and no more than one secondary dwelling unit”. 	Required modification.
4.7.19 – 18899 2 nd Concession Road – Special Provisions and Exceptions	<ul style="list-style-type: none"> • In keeping with York Region’s previous comments, “Region of York” is to be replaced with “York Region”. • Policy 4.7.19 a) iii. references approval of the Environmental Assessment for Upper York Sewage Solution. 	Suggested modification. Further discussion required.
5.0 SUSTAINABLE INFRASTRUCTURE		
5.1 General Policies for Infrastructure	<ul style="list-style-type: none"> • We note this section only has an Intent subsection. An additional “General Policies” subsection should be included and policies arranged accordingly. 	Required modifications.

	<ul style="list-style-type: none"> • Please add a policy stating that applications must be consistent with York Region’s Transportation and Water and Wastewater Master Plans and phased in accordance with the policies of this Plan. • Add portion of policy from 2.3 k): “All development approvals within the Town shall also be conditional upon commitments from the Town and/or the proponent of any development proposal to the timing and funding of any required road, active transportation facility, public service facility, park, and appropriate municipal service infrastructure. Before any development proceeds, all agreements must be in place, including financial agreements and development agreements, to provide for the servicing and community infrastructure required to accommodate growth.” • An additional policy is needed in this section reflective of YROP policy 6.3.48 which states, “To plan and coordinate cross-boundary transportation needs and to improve connectivity among transportation systems and modes with adjacent municipalities and appropriate agencies.” • YROP policy 6.4.10 requires local official plans to identify to the extent possible Regional wells, water and wastewater treatment plants, private communal water and sewage systems and appropriate buffer areas according to Provincial guidelines. It appears that the NEGOP and its Schedules/ Appendices do not fully address this policy. Confirmation is required where this policy is addressed. • 5.1.1 e) requires modification indicating that any infrastructure development or redevelopment is subject to the policies of the respective Provincial Plans, not just the Greenbelt. • In keeping with YROP policy 6.2.5, please add wording as follows: “Plan for and protect corridors and right-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs”. 	Confirmation required/ Possible modifications required.
5.2.1 Intent – The Transportation System	<ul style="list-style-type: none"> • Wording be added to this section similar to YROP policy 6.3.3. • Add reference to York Region Transportation Master Plan in 5.2.1 a). 	Suggested modification.
5.2.2 General Policies – The Transportation System	<ul style="list-style-type: none"> • YROP policies 2.3.17 and 6.1.3 requires development to be supported by a mobility plan, prioritizing active transportation and transit, that assess the impact on York Region’s transportation system, infrastructure and surrounding land uses. A corresponding policy is required in this Section of the NEGOP. • An additional policy is required in this section reflective of YROP policy 6.3.59 which states, “That integrated planning for growth management, including goods movement and transportation planning will, support and enhance the Agricultural System to ensure uses and infrastructure are compatible with agricultural uses, where possible in terms of size, scope and impact.” • YROP policy 6.3.58 directs the movement of hazardous goods to rail and roadways outside of the Urban Area and Towns and Villages to minimize risks and ensure the safe and efficient movement of goods, where 	Modification required.

	<p>possible. There does not seem to be a specific policy in the OP on this. Additional policy wording is required in this section.</p> <ul style="list-style-type: none"> An additional policy is required in this section to address YROP policy 6.3.37 which states, “To plan for and protect Provincial corridors and rights-of-way for transportation and transit facilities as defined through an Environmental Assessment process, or otherwise identified in Provincial plans to meet current and projected needs and not permit development in such Planned Corridors - Transportation that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified or is actively being planned.” 	
5.2.2.1 Transportation Demand Management	Add policy wording in this section addressing YROP policy 6.1.4 which states, “To require local municipalities to consider major trip generators and to strengthen land use and site design policies that promote multimodal access to destinations and sustainable modes of transportation, including walking, cycling, transit, and carpooling.”	Modification required.
5.2.2.1 c) Transportation Demand Management	As TDM measures apply beyond commercial and office uses, the wording of this policy also needs to reflect YROP policy 6.1.1 which states, “To prioritize active transportation, transit, and goods movement and require that Transportation Demand Management measures to reduce single occupancy automobile trips are identified in transportation studies and in development applications”.	Modification required.
5.2.2.2 Active Transportation and Complete Streets	Wording in this section needs updating to reflect YROP policy 6.3.4 which requires the Town to include policies in local official plans and secondary plans, which require sidewalks, streetlighting and street furniture within the Urban Area and Towns and Villages as a condition of development.	Modification required.
5.2.2.2 Active Transportation and Complete Streets	YROP policy 6.3.10 speaks to the continued development and promotion of Regional scale pedestrian and cycling networks such as Lake to Lake Cycling Route and Walking Trail. Consider adding supporting policy wording in this section and showing the route on Schedule 7.	Suggested modification.
5.2.2.2 d) xv. Active Transportation and Complete Streets	<p>Reflective of YROP policy 6.3.6, changes are required as follows:</p> <p>“The active transportation network, as identified on Schedule 7, shall be identified further as part of the Secondary Plan process, where required. Lands secured for active transportation facilities through the development approval process, including through Site Plan Approval, Parkland Dedication, or through the Community Benefits Charge By-law, if applicable, shall be improved by the developer to the satisfaction of the Town and York Region. Conditions of development supporting pedestrian and cycling connections could include, but are not limited to:</p> <ul style="list-style-type: none"> - Interconnections between local streets, cul-de-sacs, and across green spaces; - Connections across commercial developments; and, 	Modification required.

	- Easements across condominium developments.”	
5.2.2.3 Public Transit	Resulting in the changes imposed through Bill 23, we require the NEGOP to include YROP policies, specifically policies 6.3.18 and 6.3.19, for land taking for York Region transit network and Map references in these policies translated in to the NEGOP accordingly. Further, an additional Schedule to the NEGOP is needed reflecting the Transit Network for the Town as shown on YROP Map 10.	Modification required.
5.2.2.3 a) Public Transit	The wording of this policy needs to reflect the corresponding policy wording found in the YROP (6.3.16) for the policies shown below: To support the achievement of higher transit usage by supporting improvements in service, convenient access and good urban design in accordance with the criteria: c) Providing bus bays, transit shelters and bus loops with sufficient lighting and accessibility features where warranted as identified by Transit Service Guidelines; e) Creating an efficient system for parking and drop-off facilities for commuters; i) Applying industry, Provincial, and Regional best practices and guidelines in the review and evaluation of development applications and related studies; and, j) Requiring that development applications include a mobility plan.	Modification required.
5.2.2.3 a) v. Public Transit	This policy needs to be updated to fully reflect YROP policy 6.3.17 which requires local municipalities to: a. Provide active transportation facilities, sidewalks, street lighting and street furniture along Regional roads serviced by transit; and, b. Ensure that sidewalks and street lighting are provided on both sides of all streets within the Urban Area, and Towns and Villages that are serviced by transit. This NEGOP policy currently only addresses sidewalks.	Modification required.
5.2.2.3 b) Public Transit	Update wording in this policy to address YROP policy 4.4.42 f) for both major transit station areas.	Modification required.
5.2.2.4 Major Transit Station Areas	Policies need to be added to this section that prohibit the establishment of land uses and built forms that would adversely affect the achievement of the Major Transit Station Area minimum density targets, as per YROP policy 4.4.42 h).	Modification required.

5.2.2.4 Major Transit Station Areas	<p>A policy needs to be added to this section to establish residents to jobs ratio targets for Major Transit Station Areas to ensure live work opportunities and an appropriate balance of jobs to population, as per YROP policy 4.4.42.i).</p> <p>YROP 1.4 Key Guiding Principle 3 is based on a resident to job ratio of 2:1 focusing on Regional Centres and Corridors and Major Transit Station Areas, however, the Town can establish a different target based on local context and planning.</p>	Modification required.
5.2.2.4 a) Major Transit Station Areas	<p>For policy 5.2.2.4 a) i. consider changing the wording from "Requiring an overall density of 200 persons and jobs per hectare within a radius of between 500 and 800 metres for the GO MTSA;" to "Requiring an overall density of 200 persons and jobs per hectare within the boundary of the GO MTSA as identified on Schedule XX;"</p> <p>For policy 5.2.2.4 a) ii. consider changing the wording from "Requiring an overall density of 160 persons and jobs per hectare within a radius of between 500 and 800 metres of the Green Lane Bus Rapid Transit MTSA;" to "Requiring an overall density of 160 persons and jobs per hectare within the boundary of the Green Lane Bus Rapid Transit MTSA as identified on Schedule XX;"</p>	Suggested modification.
5.2.2.6 Goods Movement	<p>Additional policy wording needs to be included in this section to:</p> <ul style="list-style-type: none"> • To focus freight-intensive uses to areas well served by major highways and rails, where applicable, and encourage freight and logistics uses to locate in clusters that create synergies within the goods movement industry (YROP 6.3.54) • To support an interconnected and efficient system for goods movement through: a. The completion of the 400-series highway network, including the Highway 400-404 link (Bradford By-pass), and the Highway 404 Extension; and b. The addition of 400-series highway interchanges, mid-block crossings, interchange ramp extensions, and overpasses (YROP 6.3.56). • To recognize that Provincial highways and Regional roads are generally corridors for goods movement (YROP 6.3.57). 	Modification required.
5.2.2.6 b) i) Goods Movement	<p>Reflective of YROP policy 6.3.55, the following modification is required: "Ensure industrial and major commercial developments that require heavy truck traffic are located in areas near and adjacent to Provincial highway interchanges, and in proximity to Arterial Roads; and,..."</p>	Modification required.
5.2.2.7 Railways	<p>YROP policy 2022 6.3.60 requires the protection of grade separation of railways and major streets, where required. Confirmation is required as to whether there are any potential rail grade separations in the Town. If so, we recommend they be identified on the appropriate Schedules of the NEGOP.</p>	Confirmation required. Possible modification required.

5.2.2.7 c) Railways	An additional policy should be included in this section before c), reflective of YROP policy 6.3.53 which states, “To avoid locating land uses that are sensitive to noise and vibration in close proximity to rail facilities. If avoidance is not possible, appropriate design and buffering from sensitive land uses is required to protect the long-term viability of such facilities, in accordance with provincial guidelines”.	Modification required.
5.2.2.8 Airports and Aircraft Landing Strips	A policy be added to this section to address YROP policy 6.3.34 which requiring that any proposed development comply with the Aeronautics Act, which provide that buildings and structures in the vicinity of airports shall not interfere with airport operations and the movement of air traffic, which may cause a potential aviation safety hazard.	Modification required.
5.2.2.8 a) Airports and Aircraft Landing Strips	For ease of reference regarding its location, we recommend the following modification: “Hare Field/ Holland Landing Airpark is an unpaved private airport located immediately south of the community of Holland Landing shown on Schedule 8... ”.	Confirmation is required as to whether it is unpaved. Suggested modification.
5.2.2.8 b) Airports and Aircraft Landing Strips	An additional criterion be added to this policy, in accordance with YROP policy 6.3.66, requiring that development of residential or other sensitive land uses will occur in accordance with any Provincial and Federal requirements to protect existing and planned airports.	Modification required.
5.2.3.2 c) General Policies for Roads	Policy wording needs to be added as follows as per YROP policy 6.3.44: “The Town supports a modified grid pattern road network and connectivity to facilitate transit use and to increase opportunities for walking and cycling trips. Cul-de-sacs, or other disruptions to the modified grid network are generally discouraged. The Town will plan for, protect, and implement, including land takings necessary for, continuous collector and local streets in both east-west and north-south directions in each concession block, in all new urban developments, including New Community Areas to ensure an integrated finer "grid street network is developed."	Modification required.
5.2.3.4 a) ii. The Road Hierarchy	For consistency throughout this section and on Schedule 8, rename ii. to “ Regional Arterial Road ”.	Modification required.
5.2.3.4 e) Bradford Bypass/ Highway 400-404 Connecting Link	YROP policy 6.3.60 requires the protection of grade separation of railways and major streets, where required. Should it be known if and where grade separations have been determined for the Bradford Bypass, consider updating the wording for this policy and identifying the locations on the appropriate NEGOP Schedules.	Suggested modification.
5.2.3.4 h) Regional Arterial Roads – The Road Hierarchy	Policy wording needs to be added to this section reflective of YROP policies: <ul style="list-style-type: none"> 6.2.29 – “To require transit or high-occupancy vehicle lanes and cycling facilities within the right-of-way of existing and future 6-lane Regional streets, as appropriate based on established thresholds and criteria.” 	Modification required.

	<ul style="list-style-type: none"> 6.3.36 – “To limit direct vehicle access from developments adjacent to Regional roads by: a. Providing connections to local streets; and, b. Creating shared driveways by creating interconnections between adjacent properties.” 	
5.2.3.4 h) iii) Regional Arterial Roads – The Road Hierarchy (F)	<p>While the response matrix provided indicated the following comment previously provided by York Region was addressed through an updated to EG OP policy 5.2.3.4 h) iii), the policy as adopted was not updated.</p> <p><u>Previous Comment:</u> Re-design of Regional arterial roads within Local Centres shall reflect the street tree and horticultural design guidelines and standards as set out in the Street Tree and Forest Preservation Guidelines and the Street Tree and Horticultural Design Guidelines.</p> <p>This policy should be updated as follows: “5.2.3.4 h) iii) The Town shall work with York Region to redesign the Regional Arterial Roads within Local Centres. Such redesign shall follow York Region’s Street Tree and Forest Preservation Guidelines and the Street Tree and Horticultural Design Guidelines, and be in a manner that promotes speed management, improves the amenity of the area for pedestrians and minimizes impacts on the existing right-of-way;”</p>	Modification Required.
5.2.3.4 q) Local Roads – The Road Hierarchy	<p>Policy wording needs to be added to this section reflective of YROP policies:</p> <ul style="list-style-type: none"> “The inclusion of new local streets and shared private roadway systems in emerging infill areas within secondary, block and tertiary plans to consolidate access along regional roads, minimize the use of cul-de-sacs and dead-ends and supports the delivery of emergency services” (YROP 6.3.37). 	Modifications required.
5.2.3.5 ROW Dedication	<p>Policy wording needs to be added to this section reflective of YROP policies:</p> <ul style="list-style-type: none"> 6.3.40 & 6.3.46 – Additional wording is required to include necessary land taking for mid-block crossings of 400-series highways shown on Schedule 8 (NEGOP) and Map 11 (YROP), Highway 404 extension, interchange and ramp extensions for 404, in addition to the Bradford Bypass, Regional and local streets. Resulting in the changes imposed through Bill 23, we require the NEGOP to include YROP policies, specifically policies 6.3.30, 6.3.32 - 6.3.35, for land taking for York Region street widenings. Map references in these policies translated in to the NEGOP should be “Map 11 of the YROP and Schedule 8 (or Schedule x) of the NEGOP”. We also note that either Schedule 8 or an additional Schedule to the NEGOP needs to show the actual Planned Street Widths (ROWS) for Regional Roads. A map reference of “Regional Planned Street = up to 45m widths” is not sufficient. 	Modifications required.

5.2.4 Municipal Service Infrastructure Systems	<ul style="list-style-type: none"> • Both Town and York Region Water and Wastewater Master Plans need to be referenced throughout this section. • While phasing of servicing is mentioned in 5.2.4.1 – Intent, there needs to be additional wording surrounding the Phasing of infrastructure in support of growth in a fiscally responsible manner that addresses phasing in the built up area as well as the designated greenfield and new community areas as outlined in Section 2.3 and 4.2.xx, that is reflect of provincial and regional policies (YROP 2.2.3, 2.2.4, 2.2.8, 4.2 – Phasing for New Community Areas and 6.3.2), in addition to the Town and Region’s Master Plans. 	Modifications required.
5.2.4.1 a) ii. Intent - Municipal Service Infrastructure Systems	<ul style="list-style-type: none"> • The following modifications are required to this policy: “Require that all new development within the Central Growth Area and within the Mount Albert Greenbelt Settlement Area be connected to the Regional or local municipal service infrastructure network, or a suitable alternative servicing strategy, to the satisfaction of the Town and York Region;” • The portion of this policy related to Mount Albert (Towns & Villages), needs to be updated to reflect YROP policy 6.4.13, which states, that development within the Mount Albert Settlement Area “will occur on the basis of full municipal water and wastewater treatment services where such facilities currently exist or where expansion of such facilities is deemed fiscally and environmentally feasible by York Region. For existing or previously approved development in Towns and Villages, municipal water and wastewater treatment services will be continued where feasible and in keeping with the provisions of local official plans and the Plan”. 	Modification required.
5.2.4.2 General Policies – Municipal Service Infrastructure Systems	<ul style="list-style-type: none"> • YROP policy 6.1.7 speak to promoting the implementation of water efficiency innovations such as water reuse systems, rainwater harvesting and innovative stormwater management technologies. Consider inclusion of a similar policy in this section. • YROP policy 6.1.9 requires that plans for servicing incorporate conservation strategies and the protection of the natural environment including key natural heritage and key hydrologic features, subject to other policies of the Plan. Please add a similar policy to this section. • YROP policy 6.4.9 states that “where municipal services exist outside of settlement areas within an existing municipal servicing area boundary as defined by the environmental assessment, connection to a municipal service may be permitted for only existing or permitted uses subject to the submission of suitable studies, administrative and financial arrangements to the satisfaction of York Region”. Additional wording reflecting this is recommended. • YROP policy 6.4.14 states that “all improvements or new water and wastewater infrastructure systems shall conform to the applicable Provincial plans including the source protection plans”. A policy is needed in this section reflective of this requirement as only the Greenbelt Plan is referred to. 	Suggested and required modifications.

	<ul style="list-style-type: none"> • YROP policy 6.4.23 speaks to the correct sizing of water and wastewater systems to consider the potential for expansion of the service area, intensification and increased servicing allocation where permitted by the York Region Official Plan, York Region Master Plans, local municipal official plans and Provincial plans. Additional wording reflecting this is recommended. • Further YROP policy 6.4.16 states that the planning and design of water and wastewater infrastructure will consider potential impacts from climate change. Please add wording to this section taking into account this policy. 	
5.2.4.2 a) General Policies – Municipal Service Infrastructure Systems	An added reference to “York Region Water and Wastewater Master Plan” is needed.	Modification required.
5.2.4.2 b) General Policies – Servicing Allocation Tracking and Assignment System - Municipal Service Infrastructure Systems	<p>There are currently capacity limitations for ICIs in the existing wastewater system. Until such time as the York Region Sewage Works Project is completed and operational, the following modification is required: “The Town shall maintain a Servicing Allocation Tracking and Assignment System for the purposes of assigning servicing allocation for growth and development. For the purposes of this policy, non-residential, institutional, and employment development, where permitted, does not require the specific assignment of servicing allocation”.</p> <p>The tracking of allocation assignment will still be required for all land uses after the York Region Sewage Works Project is complete and operational.</p>	Modification required.
5.2.4.2 c) General Policies – Servicing Allocation Tracking and Assignment System - Municipal Service Infrastructure Systems	<ul style="list-style-type: none"> • Modifications are required to this policy as follows: “Before the approval of any application for development, the Town must be satisfied that adequate municipal servicing infrastructure, including overall system capacity and allocation, is available or can efficiently and economically be provided to support the proposal, in accordance with the Town’s Servicing Allocation Tracking and Assignment System. Where adequate municipal servicing infrastructure, capacity and/ or allocation does not exist,...”. • Further, this policy/ section needs updating to reflect YROP policy 6.4.3 that states, “That the provision of appropriate water and wastewater infrastructure and servicing capacity is coordinated with plans of subdivision, plans of condominium, site plans or any other development applications by local municipalities in order to ensure services are available prior to occupancy”. 	Modification required.
5.2.4.2 d) General Policies – Servicing Allocation Tracking and Assignment	The wording of this policy does not conform with the policies of the YROP. Modification is required to remove: The Town may consider alternative, innovative, and sustainable privately developed service infrastructure systems where it and York Region are satisfied that the proposed system will not become a financial burden on the	Modification required.

System - Municipal Service Infrastructure Systems	municipality and where all environmental concerns have been addressed to the satisfaction of the Province, York Region and the Town.	
5.2.4.2 e) General Policies – Employment Areas - Municipal Service Infrastructure Systems	Similar to the comment above, there are currently capacity limitations for ICIs in the existing wastewater system. Until such time as the York Region Sewage Works Project is completed and operational, the following modification is required: “Notwithstanding any other policy of this Plan, no specific water and wastewater capacity allocation is required for the Employment Areas as identified on Schedule 1. Notwithstanding the above, The Town shall work with York Region to ensure that the water conservation targets for the Employment Areas developed as part of the Town-wide water conservation program shall be met”.	Modification required.
5.2.4.2 g) General Policies – The Extension and Improvement of Services - Municipal Service Infrastructure Systems	This applies to local infrastructure. As such, we suggest the following modification: “The extension and improvement of local municipal service infrastructure required to accommodate growth based on the planning horizon of this Plan will be carried out in accordance with capital budget provisions or separate agreements, and, wherever possible, it will be coordinated with other public works including extensions or improvements to the transportation and utility distribution systems. No municipal service infrastructure shall be permitted with respect to any service which is external to the subdivision lands, unless approved by the Town”.	Suggested modification.
5.2.4.3 a) Municipal Water Servicing Infrastructure	This policy requires rewording as preamble or removal: A municipal water supply system shall be maintained and expanded as necessary by York Region to service the Community and Employment Areas within the Central Growth Area and the Mount Albert Greenbelt Settlement Area. Sufficient water storage to provide an adequate emergency supply and fire protection shall also be provided by York Region.	Modification required.
5.2.4.4 Municipal Wastewater Servicing Infrastructure	An additional policy is needed in this section reflective of YROP policy 6.4.20 which states, “require local municipalities to implement mandatory connection to municipal wastewater systems, where they exist, in vulnerable areas of a Wellhead Protection Area and/or Intake Protection Zone where individual on-site sewage systems have been identified as a significant drinking water threat.”	Modification required.
5.2.4.4 c) Municipal Wastewater Servicing Infrastructure (IAM)	For clarification, we suggest the following modification: “The Town shall work with York Region to undertake studies to reduce the extent and amount of inflow and infiltration in both Regional and Town owned and operated wastewater systems in accordance with York Region’s Inflow and Infiltration Reduction Strategy consistent with Regional programs and standards;”	Suggested modification.

5.2.4.5 a) Mount Albert Servicing (IAM)	The following modification is required to this policy: "All existing and proposed development within the Greenbelt Settlement Area of Mount Albert, as shown on Schedule 1, shall be serviced by municipal water and sanitary sewers., or a suitable alternative servicing strategy, to the satisfaction of the Town; "	Modification Required.
5.2.4.6 Private Servicing	Consider renaming this section to "Private and Partial Servicing".	Suggested modification.
5.2.4.6 a) Private Servicing (IAM)	The following modification is required to this policy: "Development on individual private services may only be considered for permitted uses on an existing lot of record, or to support development permitted within the Greenbelt Protected Countryside. Any such development proposal shall be required to undertake hydrogeological and other technical studies relating to soil conditions, groundwater stability, demonstration of no adverse impacts to groundwater quality and the suitability of the area for septic tank systems and tile beds to determine their impact on the future development and existing or proposed adjacent land uses and shall be subject to the approval of the Province, or the Town."	Modification required.
5.2.4.6 e) Interim Servicing - Private Servicing	<ul style="list-style-type: none"> • Modifications are required to this NEGOP policy to include the criteria listed in a. – h. of YROP policy 6.4.8. • Please add a policy in this section that addresses YROP policy 6.4.7 regarding private communal systems, should the protection of public health issue in areas of existing groundwater contamination as determined by a Medical Officer of Health, and where full municipal water and wastewater services is not planned, available, or feasible in such an area, and cannot be provided. 	Modification required.
5.2.5 Stormwater Management (Streetscaping)	<p>Streetscape has reviewed the submitted LOP from the Town of East Gwillimbury and is overall very encouraged by its contents as they relate to the planning and design criteria for the Complete Streets approach including accommodations for active transportation elements. Along these lines we would like to see incorporated into the LOP, consideration of Low Impact Design (LID) Technologies especially where it relates to storm water management including permeable pavements, sustainable materials etc.</p> <p>We understand policy 5.2.5.2 c) requires the Town to prepare a set of guidelines for alternative development standards and LID criteria. Consideration should be given to this comment when developing these guidelines and criteria.</p>	None at this time.
5.2.5.2 General Policies Stormwater Management	A policy needs to be added to this section requiring all development and site alteration proposals meet applicable stormwater management policies, guidelines and best practices (YROP policy 6.5.3).	Modification required.

5.2.5.3 The Stormwater Management Treatment Approach	A policy is required in this section reflective of YROP policy 6.5.2.	Modification required.
5.2.5.3 a) The Stormwater Management Treatment Approach	Update policy 5.2.5.3.a) to include all components from YROP policy 4.2.15.	Modification required.
5.2.5.3 e) The Stormwater Management Treatment Approach	This policy needs to be updated to reflect that all <i>New Community Areas</i> as identified in the YROP, require Secondary Plans (YROP policy 4.2.10). This policy then needs to further be updated to reflect the SWM criteria outline in YROP policy 4.2.15 related to <i>New Community Areas</i> and shall include urban stormwater management approaches (YROP 6.5.5).	Modification required.
5.2.5.3 h) & i) The Stormwater Management Treatment Approach	Please update the wording in these policies to reflect YROP policy 6.5.4.	Modifications required.
5.2.6.2 – General Policies - Wellhead Protection (WRS)	<ul style="list-style-type: none"> • A policy needs to be added to this section reflective of YROP policy 6.4.36 which indicates that in WHPA A and the 0-to-2 year time of travel zone on YROP Map 6, new storage of animal manure, undertaking of animal agriculture and the storage of agricultural equipment for other than personal or family use, is prohibited. • Policies need to be added in this section related to proposed geothermal systems in Wellhead Protection Areas in accordance with YROP policy 6.4.34 a. – e. 	Modification required.
5.2.6.2 d) – General Policies - Wellhead Protection (WRS)	<p>Policy 5.2.6.2.d) should be updated to reflect the new list of land uses in the YROP under policy 6.4.31 that require a Source Water Impact Assessment and Mitigation Plan:</p> <p>“6.4.31 That in Wellhead Protection Areas A, B, C, D and Intake Protection Zone 1, a Source Water Impact Assessment and Mitigation Plan will be prepared and approved prior to the establishment of new land uses that involve the storage or manufacture and/or handling of: a. Petroleum-based fuels and or solvents; b. Pesticides, herbicides, fungicides or fertilizers; c. Chlorinated solvents; d. Construction equipment; e. Inorganic chemicals; f. Road salt and contaminants; g. The generation and storage of hazardous waste or liquid industrial waste, and waste disposal sites and facilities; h. Organic soil conditioning sites and the storage and application of agricultural and non-agricultural source organic materials; i. Snow storage and disposal facilities; j. Tailings from mines; and k. Dense non-aqueous phase liquids (DNAPLS).”</p>	Modification required.
5.2.6.2 f) – General Policies - Wellhead Protection (WRS)	<p>Per YROP policy 6.4.32, the following modification is required to this policy:</p> <p>“The expansion of existing incompatible activities, as outlined in d), within the 100m to five year time of travel zones (Wellhead Protection Areas A, B, and C, and D), as shown on mapping provided in Appendix I, will be discouraged but may be permitted subject to an approved Source Water Impact Assessment and Mitigation Plan.”</p>	Modification required.

5.2.6.2 i) – General Policies - Wellhead Protection (WRS)	Please note that for the purpose of Source Water Protection, low density residential for Source Protection policy implementation means anything with less than 4 dwellings. For clarification purposes, a modification as follows is suggested: “i) Any applications for a land use other than low density residential (less than 4 dwellings) in Wellhead Protection Area A, B, and C will require a Section 59 notice issued by the Risk Management Official as part of the complete application requirements under the Planning Act, Condominium Act and Ontario Building Code Act.”	Suggested modification.
5.2.8 Telecommunications, Utility and Technology Infrastructure	<ul style="list-style-type: none"> • YROP policy 6.7.8 requires local municipalities to develop broadband policies that support implementation of emerging technologies, advanced telecommunications and open access conduit on all existing and future municipal roads and within subdivisions. This section shall be modified to include broadband policies reflecting the requirements of this Regional policy. 	Modification required.
5.2.8 Telecommunications, Utility and Technology Infrastructure	<ul style="list-style-type: none"> • YROP policy 6.7.1 looks to municipalities to identify and protect existing and planned utility corridors as determined through the Environmental Assessment Act process where applicable or identified in Provincial plans to support expected growth within York Region and its neighbouring municipalities. While most NEGOPs Schedules and Appendices identify corridors like hydro and rail, we recommend that all utility corridors be shown on all Schedules where they occur. In keeping with this policy, please confirm all utilities are identified in the NEGOP and fulsome supporting policies are provided. • YROP policy 6.7.7 encourages complementary uses on utility corridors, such as trails, transit, commuter parking, community gardens, low-impact development and appropriate vegetation. Consider adding a related policy to this section. 	Confirmation required. Suggested modification.
5.2.8 a) Telecommunications, Utility and Technology Infrastructure	As per ROP policy 2.3.15 c., the following wording shall be added: “ iii. Support emerging technologies such as broadband and review opportunities within existing communities to incorporate broadband infrastructure, where appropriate. ”	Modification required.
5.2.8 b) Telecommunications, Utility and Technology Infrastructure	Modify this section to address YROP policy 2.3.50.c which states: “To encourage local municipalities to foster an economic environment that supports businesses, grows employment and volunteer opportunities, and attracts and retains talent by developing policies in their official plans, strategies and programs, which may include: c) Securing advanced infrastructure, communications, and network facilities, including broadband, to support a knowledge economy”.	Suggested modification

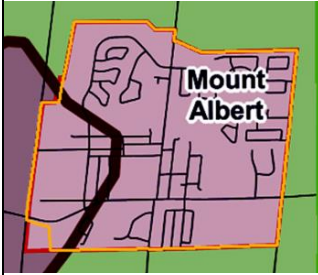
5.2.8 g) Telecommunications, Utility and Technology Infrastructure	<p>This policy requires updating to comply with YROP policy 6.7.5 which “requires underground installation of utilities, where feasible, in New Community Areas and strategic growth areas, and to encourage buried utilities in the balance of York Region”.</p> <p>This NEGOP policy currently only speaks to requiring, where feasible, underground utilities in the “Village Core” designation and in the GLSP area. Please change the wording to include this requirement in <i>New Community Areas</i>, strategic growth areas in EG (i.e. MTSAs, Regional Corridors, local centres and corridors), as well as encourage it throughout the balance of EG.</p>	Modification required.
5.2.9 - Waste Management and Diversion	<ul style="list-style-type: none"> • We note this section only has an Intent subsection. An additional “General Policies” subsection should be included, and policies arranged accordingly. • In keeping with YROP policies 6.6.1 & 6.6.4, 5.2.9.1 a) be amended as follows: “new Help in achieving the waste management reduction and diversion targets identified in the SMART Living Waste Management Plan”. “i. Continue to support and/or develop and implement programs to further promote and maximize waste diversion that aligns with provincial direction in the approval process for new multi-residential developments;” • Include a policy in this section reflective of YROP policy 6.6.5 which states, “To work with local municipalities to require existing multi-unit residential buildings to provide convenient access to three-stream waste diversion programs and incorporate additional specialized programs where opportunities exist, such as batteries and electronic waste”. • While NEGOP policy 4.6.2 a) ii. prohibits "uses that involve waste disposal, recycling, and storage of contaminated materials" in all designations, including the Environmental Protection Designation, please add a policy in either this section, or in 4.4.2 – General policies for the Natural Heritage System, that is reflective of YROP policy 6.6.8 that “prohibits new waste disposal sites within the Regional Greenlands System”. 	Required modification.
5.2.9 - Waste Management and Diversion (TP)	<ul style="list-style-type: none"> • We suggested adding that new multi-unit or commercial developments fronting Regional Roads shall provide local road or internal waste collection, collection on Regional Roads will not be permitted. As such, we continue to suggest the following modification: “Proponents of new multi-unit and condominium developments will be required to submit a waste management plan demonstrating best practice of residential waste management through onsite separation and storage for all recyclables as addressed by the single residential unit municipal program(s). Multi-unit residential developments shall be required to incorporate three-stream waste collection capabilities. Collection on Regional Roads will not be permitted.” 	Suggested modification.


6.0 IMPLEMENTATION + INTERPRETATION		
General Comment	In keeping with YROP policies 4.4.26 and 4.4.52, we encourage the Town to consider a full range of implementation strategies for strategic growth areas like as-of-right zoning especially for the “ <i>missing middle</i> ” along local corridors, streamlined development approvals, development permits and other applicable tools.	Suggested modification.
6.1.1 General Comments - Upper Tier Legislation/ Plans	Add policy wording surrounding Greenbelt, ORMCP and YROP transition, as well as existing use policies similar to YROP policies 7.4.13– 7.4.18.	Modifications required.
6.1.3.2 b) iv Monitoring	In accordance with YROP policy 2.2.7, provide the following additional wording to 6.1.3.2 b) iv: “Provincial growth and intensification targets as well as the growth and intensification targets of this Plan are being met; and,…”	Modification required.
6.1.3.2 b) Monitoring	In accordance with YROP policy 2.2.7, provide the following additional policy to 6.1.3.2 b): “ vi. Growth management strategies of this Plan are being implemented ”	Modification required.
6.1.3.3 b) Amendments to the Plan	The <i>Planning Act</i> outlines the process for considering amendments to an Official Plan and roles of the local municipality and approval authority, including consultation and notification requirements. The following modification is required: “All Amendments to this Plan shall proceed in accordance with the <i>Planning Act</i> approval requirements. set out in this Plan, in addition to any others deemed appropriate by the Town, in consultation with York Region, particularly with policies that pertain to ensuring proper public notification and consultation. The responsible approval authority (either the Town or York Region) may be assisted in their review of a proposed Amendment by the Conservation Authority, or any other government agency having jurisdiction. ”	Modification required.
6.1.3.3 e) Amendments to the Plan	<ul style="list-style-type: none"> • Consider removing this policy. If not, please update it to reflect the latest <i>Planning Act</i> provisions. • Policies are needed in this section similar to YROP policies 7.4.5 and 7.4.6 regarding amendments to the Greenbelt Plan and Oak Ridges Moraine Conservation Plan. 	Modification required.
6.1.3.4 Secondary Plans	In accordance with YROP policy 4.2.10, secondary plans are required for <i>New Community Areas</i> as identified on Map 1B. These areas are to be shown on the NEGOP Schedules. Wording needs to be included in this section indicating that secondary plans for <i>New Community Areas</i> must be in keeping with the, and are supported by, the policies and requirements outlined in the new <i>New Community Area</i> section in Section 4.2 of this plan.	Modification required.

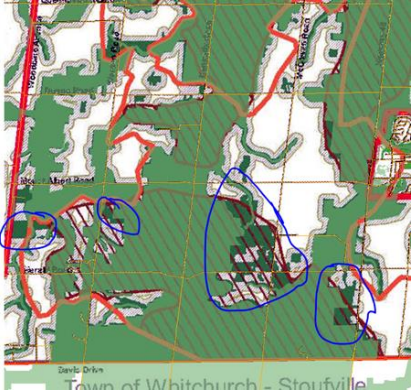
6.1.3.4 Secondary Plans	This section needs to be modified to include YROP requirements for secondary plans outlined in YROP policy 4.4.21 “That secondary plans or equivalent comprehensive planning studies within strategic growth areas specify that a minimum of 35% of new housing units within Regional Centres and major transit station areas (MTSAs) be affordable, offering a range of compact housing forms and tenures, and intrinsically affordable units for low and moderate income households.”	Modification required.
6.1.3.4 Secondary Plans	This section needs to be modified to include the following YROP secondary plan criteria for new Local Centres outlined in YROP policy 4.4.50: “a. That Local Centres connect efficiently with and contribute to the vitality of the surrounding area; b. That focal points for community activity and civic pride are created; c. That specific employment targets that contribute to live/work opportunities be identified; d. The revitalization and preservation of cultural heritage resources within core historic areas through urban design standards which reflect local heritage, character, and streetscape; and e. Minimum criteria for strategic growth areas in policy 4.4.24, as appropriate.”	Modification required.
6.1.3.5 Community Design Plans	Confirmation is required from the Town as to whether it is still their intention to undertake a Community Design Plan process for the New Community Areas which require a secondary plan process. This section and Schedule 3 may need to be updated accordingly.	Confirmation required. Possible modifications required.
6.1.6 The Subdivision of Land	This section needs to be updated to include a policy that states that lot creation shall only be permitted per the policies of the Greenbelt Plan, the ORMCP, and this Plan.	Required modification.
6.1.6.1 Plan of Subdivision/ Condominium	Consider including a policy in this section similar to YROP policy 7.3.15 that states, “That if a plan of subdivision or part thereof has been registered for eight years or more, and does not meet the growth management targets of the Plan and does not conform to the policies of the Plan, Regional Council or the Council of the respective local municipality shall use its authority under Section 50(4) of the Planning Act to deem it not to be a registered plan of subdivision”.	Suggested modification.
6.1.12.1 c) Pre-consultation Meeting	In light of the recent Planning Act changes regarding application fee refunds, the Town may want to reconsider this policy.	For information.
6.1.12.2 Complete Application Requirements – Table 2: Required Supporting Studies	The following changes are required in Table 2: <ul style="list-style-type: none"> - Affordable Housing Report Contribution Plan - Contaminant Management Plan - Landform Connection Study Conservation Plan 	Modifications required.

	<ul style="list-style-type: none"> - Planning Justification Report, including Provincial Plan Conformity Evaluation - Section 59 Notice - Source Water Impact Assessment and Mitigation Plan - Subwatershed Plan Study or Equivalent - Transportation Study, including a Mobility Plan and Transportation Demand Management Plan 	
6.1.7 Legal Non-Conforming Uses, Buildings or Structures	Additional wording is required in this section addressing YROP policy 7.4.12, particularly related to Ministerial Zoning Orders (MZOs).	Modification required.
6.2.1 -General Comment – Interpreting the Plan	<ul style="list-style-type: none"> • As per YROP policy 7.4.11, please add the following policy to 6.2.1 b): “That all planning decisions shall conform to the Provincial Plans and shall be consistent with the Provincial Policy Statement, subject to applicable Provincial transition provisions.” • This section requires updating, particularly policy g) based on the comment above regarding the need for a separate Definition Section. • A comment needs to be added to this section similar to YROP policy 7.4.8 that states, “That in the case of a discrepancy between the text and the related map, the policies will take precedence.” • NEGOP policy 6.2.1 d) indicates that the Plans’ Appendices are non-statutory elements of the Plan. All of the Appendices of the NEGOP need to be re-labeled as Schedules given relate operative policies for: Areas of High Aquifer Vulnerability Oak Ridge Moraine Highly Vulnerable Aquifers Significant Groundwater Recharge Areas Wellhead Protection Significant Threat Areas Recharge Management Area Aggregate Resource Overlay and ORM Land Form Conservation Areas 	Modifications required.
SCHEDULES + APPENDICES		
General Comment	All NEGOP Schedules and Appendices are required to be consistent with, and conform to, the YROP and Provincial Plan mapping. York Region can provide updated mapping layers if needed. The NEGOP Scheduled and Appendices need to be updated to reflect the YROP mapping. Further, a number of YROP Schedules have not been addressed by the NEGOP, including but not limited to, Maps 3, 4, 5, 9A, 9B, 10, 12B. See comments below.	Modifications required.

General Comment	In keeping with the comment above regarding NEGOP polices 6.2.1 d), which indicates that the Plans Appendices are non-statutory elements of the Plan. Please relabel the appendices as Schedules and update Appendices 1 – 6 with the corresponding approved YROP Maps (YROP 6.4.26).	Confirmation required.
General Comment	Schedules of the NEGOP need updating to reflect YROP Maps 9A – Regional Road Cycling Network and 9B – Regional Trail Network. Schedule 7 currently does not show this information and/ or it is outdated.	Modification required.
General Comment	An additional Schedule to the NEGOP is needed, reflecting the Transit Network for the Town as shown on YROP Map 10.	Modification required.
General Comment	Urban/ Settlement Area boundaries are required to be consistent with the YROP to align with the changes resulting with Provincial approval of the Plan.	Modification required.
General Comment	Components of the Water Resource System missing from the Schedules (Draft ROP policy 3.1.3, 3.1.4, 3.4.4). Please update all Schedules accordingly (Significant Surface Water Contribution Areas and Key Hydrologic Features including wetlands mapping is missing).	Modification required.
General Comment	Hamlets and their boundaries need to be shown in detail, in accordance with YROP Map 1C, and included on all applicable Schedules.	Modifications required.
General Comment	Include the Highway 404 Employment Secondary Plan in Schedule 3 Land Use Schedules as a new Schedule.	Modification required.
General Comment	Include and update maps for key natural heritage features and key hydrologic features as per YROP policy 3.4.2 and 3.4.4. Refer to YROP Maps.	Modification Required.
General Comment	YROP policy 6.4.10 requires local official plans to identify to the extent possible Regional wells, water and wastewater treatment plants, private communal water and sewage systems and appropriate buffer areas according to Provincial guidelines. While Regional wells are shown and included on NEGOP mapping, the other items are not. Please update to address.	Modifications required.
General Comment	Consider using the same map templates for all maps, having legend, scale bar, north arrow, and Notes & Copyright in the same location for each map. Update Copyright dates on maps. Align Legend items. Add or Remove Lot/Con on all maps.	Suggested modification.

General Comment	<p>New Figures (Non-operative Schedules)</p> <p>It would be useful to include 'Map 1 – Regional Structure', Map 2 – 'Regional Greenlands', and others as needed, from the YROP as new Figures (non-operative) schedule in the Town's OP. This will help contextualize the Town within the Regional landscape.</p>	Suggested modification.
Schedule 1 – Growth Management	<ul style="list-style-type: none"> • The boundary of the Central Growth Area needs to be amended to exclude the former Future Urban Areas which were removed with the Province's approval of the ROP and replaced with the appropriate Agricultural Area or Rural Area Designation as per the ROP. Areas formerly identified as Future Urban Area in the ROP now need to be shown as part of the Agricultural System. • New Community Areas as shown on Map 1B of the ROP need to be identified on this Schedule. • Consider removing Population Forecast Table on this Schedule. If not, the numbers should be amended to reflect required modifications to EG OP policy 2.1 a). 	Modification required.
Schedule 1 – Growth Management	<p>Mount Albert Boundary does not match ORMCP Settlement Boundary. Please revise.</p>  <p>The image is a map of Mount Albert, showing a settlement boundary (indicated by a thick black line) and an ORMCP Settlement Boundary (indicated by a thin orange line). The settlement boundary is irregular and does not match the more rectangular ORMCP boundary. The text 'Mount Albert' is written in the center of the map.</p>	Modification required.
Schedule 2 – Urban Structure	<p>Mount Albert Boundary does not match ORMCP Settlement Boundary. Please revise.</p>	Modification required.

		
<p>Schedule 2 – Urban Structure</p>	<ul style="list-style-type: none"> • Amend this Schedule to remove the “Future Urban Area” and “Future Urban Employment Area” and replace with the appropriate Agricultural Systems land use designation(s). • New Community Areas as shown on Map 1B of the ROP need to be identified on this schedule. • There needs to be a clear distinction between Designated Greenfield Areas and New Community Areas on this Schedule. Please refer to YROP Map 1B. • Schedule 2 should make reference to the respective Schedule 3s (Land Use designations). • Hamlets are not identified on this Schedule. Please include. • Please include Regional Corridors (YROP Map 1) and the proposed Regional Road connections across Highway 404 (e.g. mid-block crossing) (YROP Map 11) • The East-West Collector is not shown to its full extent across the HWY 404 Employment Secondary Plan Area. • Regional Corridors and Local Corridors should be distinguished on Schedule 2 • Legend could be simplified to reduce duplication. • The Environmental Protection Designation on Schedule 2 should be hatched so that the Employment Areas beneath can be seen. 	<p>Modifications required.</p>
<p>Schedule 3 – Secondary Plan Area Community Design Plans</p>	<ul style="list-style-type: none"> • We understand from the response matrix provided that “New Community Design Plan” were added to Schedule 3; however, for consistency purposes the New Community Area term should be used throughout the Plan and amended accordingly in the Schedule 3 legend. • The Environmental Protection Designation on Schedule 3 Land Use Plans should be hatched so that the Employment Areas beneath can be seen. • Regional Corridors and Local Corridors should be distinguished on Schedule 3D. 	<p>Modifications required.</p>

Schedule 4 – Natural Heritage System	<p>Inconsistencies between Regional Greenlands and East Gwillimbury Natural Heritage System. Please update.</p> 	Modifications required.
Schedule 4 – Natural Heritage System	<p>Schedule 4 must be consistent the Regional Greenlands System and its components.</p> <p>Confirmation is required regarding the data sources for Environmental Protection Designation, Big Woods Overlay & Parks and Open Space.</p>	Clarification and modification required
Schedule 5 – Rural & Agricultural Area	<ul style="list-style-type: none"> • The Prime Agricultural Area, Rural Area, and Specialty Crop Area (Agricultural System) mapping is not consistent with the YROP Map 1A, particularly in Central Growth Area. Further, the Agricultural System needs to be shown under the existing land use designations outside the settlement areas, even on the ORM. Given this, we would recommend the Agricultural System and their components be shown on a separate Schedule. • The defined Hamlet boundaries cannot be determined on this Schedule. An additional Schedule is needed to show the exact boundaries of all three EG Hamlets. 	Modifications required.
Schedule 7 – Active Transportation, Parks and Community Facilities	<ul style="list-style-type: none"> • Information shown on this schedule is out of date and needs to be updated to reflect YROP Maps 9A & 9B. 	Required modification.
Schedule 7 – Active Transportation, Parks and Community Facilities	<ul style="list-style-type: none"> • Many Regional Forests are in East Gwillimbury. Consider showing them on this Schedule. • This Schedule is busy. Consider separating information into at least 2 schedules. • Consider showing the Lake to Lake Cycling Route and Walking Trail on this Schedule. 	Suggested modification.
Schedule 8 – Road Network	<ul style="list-style-type: none"> • Actual Regional Road planned street widths need to be included either on this Schedule or in an additional Schedule to the NEGOP reflecting the Planned Street Widths of YROP Map 11. Removal of the wording 	Modification required.

	<p>“Regional Planned Street = up to 45m widths” is not sufficient for the identified Regional Arterial Road as currently shown on this Schedule.</p> <ul style="list-style-type: none"> • The road network in the Highway 404 Employment Secondary Plan Area needs to be shown. • Highway 404 south-east of Ravenshoe Road and Woodbine Avenue should be shown as the extension. 	
Appendix I – Map X Highly Vulnerable Aquifers (WRS)	<p>Also see comments from LSRCA below. HVA maps appears to have incorporated the Areas of High Aquifer Vulnerability (AHAV) into the map and they appear to be missing some Highly Vulnerable Aquifers in some areas:</p> <ul style="list-style-type: none"> • A small section along 2nd Concession north of Green Lane • Within the HVA at Boag Road and 2nd Concession <p>Please make corrections to the Highly Vulnerable Aquifers map to address these discrepancies.</p>	Modification required.
<p>Ministry of Municipal Affairs and Housing</p> <ul style="list-style-type: none"> - The Ministry of Municipal Affairs and Housing will be circulated on the next version of the Adopted NEGOP prepared in response to the comments of this letter and upon receipt of the requested conformity information. 		
<p>Lake Simcoe Region Conservation Authority (January 23, 2023/ March 14, 2023)</p>		
General Comments - Vegetation Protection Zones and 4.4.2.2 – Natural Heritage Evaluation	<ul style="list-style-type: none"> • Previous comments provided by the LSRCA recommended a separate section detailing required minimum vegetation protection zones for features and that the Natural Heritage System should include minimum vegetation protection zones to specified features. This comment was only partially addressed in 4.4.8.3 o) - Development Policies (Lands Adjacent to a Watercourse) - Policies for Natural Hazards. • As the mpvzs are difficult to determine, please include a section and table outlining the applicable mpvzs for features in East Gwillimbury similar to Table 3 in the YROP or King Township Official Plan. Minimum vegetation protection zones of 30 m be recommended to provide greater protection to core features, and to provide consistency across provincial plans within the municipality. • Please include a point that specifies the NHE will include identification of appropriate minimum vegetation protection zones for natural heritage features and hydrologic features not covered by other provincial plans (i.e., Greenbelt, ORMCP, and LSPP). 	Modifications required.
4.2.8.3 h) Development Policies – Parks and Open Space Designation and Symbols	Add the following wording to incorporate trail impact studies:	Modification required.

	<p>“h) Public parks shall include clearly defined entrances to the local trail system integrating trail head locations into the design of parks. Any application for a proposed trail shall be accompanied by a trail impact study assessing and identifying impacts to existing natural heritage features as well as opportunities for protection and enhancement”.</p>	
4.4.3.2 a) iv. - Components – The Environmental Protection Designation	<p>Previous comment not addressed:</p> <p>Definitions and criteria for identifying Core Areas and Supporting Areas do not appear to be provided in the EG OP, nor do these features appear in the Schedules.</p> <p>Please provide criteria for Core Areas and Supporting Areas and their minimum vegetation protection zones.</p>	Further discussion required. Potential modifications needed.
4.4.5.3 c) - The Underlying Land Use Designation to Apply – Development Policies – The Big Woods Overlay	<p>Modification to the policy required as follows to add the term “approved”:</p> <p>“4.4.5.3 c) Subject to the conclusions and requirements of the approved Natural Heritage Evaluation, the lands within the Big Woods Overlay may be developed in accordance with the permitted uses and development.”</p>	Modification required.
4.4.8 General Comment - Policies for Hazard Lands	<p>Previous comments recommended having a separate Schedule (or Appendix) showing hazard lands, including floodplain and other hazards. The response matrix provided from the Town indicates EG OP policy 4.4.8.2 does note ‘general’ incorporation of hazard lands into EPA, and additional text policies under f) speak to CA detailed mapping for floodplain. Also provided in ZBL.</p> <p>We note that in some instances the OP mapping does not consistently capture the floodplain mapping in the EP designation and by having separate mapping may help to resolve this. Please include a Schedule or Appendix outlining hazard lands in East Gwillimbury.</p>	Modification required.
4.4.8 General Comment - Policies for Hazard Lands	<p>While EG OP policy 4.4.8.1 indicates the intent of to direct development away from hazards lands. The following modification is required to 4.4.8.1 a) and additional policies are needed in sections 4.4.8.1 and 4.4.8.3 as follows:</p> <p>“4.4.8.1. a) It is the intent of this Plan that the Town identify hazards that are constraints to development and pose threats to human life and property and direct development and site alteration in accordance with guidance developed by the Province, outside of hazardous lands and hazardous sites in accordance with provincial guidelines. away from such areas. Hazard Lands are incorporated into the Environmental Protection Designation identified on Schedule 4. Additional detail on the Hazard Lands component of the Environmental Protection</p>	Modification required (LSRCA & YR).

	<p>Designation are included on mapping in Appendix I and in the Town's Zoning By-law". Add reference to separate NEGOP Schedule/ Map showing hazard lands.</p> <p>"new policy 4.4.8.1 b) Hazard Lands are incorporated into the Environmental Protection Designation identified on Schedule 4. Additional detail on the Hazard Lands component of the Environmental Protection Designation are included on mapping in Appendix I and in the Town's Zoning By-law."</p> <p>"new policy in 4.4.8.3 To direct development and site alteration in accordance with guidance developed by the Province, outside of hazardous lands and hazardous sites in accordance with provincial guidelines."</p> <p>"new policy in 4.4.8.3 That development and site alteration are generally prohibited within defined portions of the floodplain, subject to conservation authority regulations."</p>	
4.4.8.3 Lands Adjacent to a Watercourse – Policies for Hazard Lands	Inclusion of specified setbacks is supported. However, a please provide a definition for 'watercourse' (i.e., ephemeral vs intermittent vs permanent) for areas outside of the Greenbelt, ORM and LSPP areas.	Modification required. (LSRCA).
4.5.6.3 g) Development Policies – Recreation Area Designation	<p>This policy, with the additional wording needs to be moved to another section. We recommend Section 4.6.1 - Land Uses Permitted in All Designations.</p> <p>"Small-scale structures for recreational uses (such as boardwalks, footbridges, fences docks and picnic facilities) are permitted within in all land use designations, including the Environmental Protection Designation, however, the negative impacts on all natural heritage features and their associated ecological functions shall be minimized and supported by a Trail Impact Study."</p>	Modification required. (LSRCA).
4.5.8 s. iv., 2 nd Bullet – Rehabilitation – Development Policies – Aggregate Extraction Area Designation	<p>In keeping with the Town's modification to Bullet 1 of this policy in response to previous comments provided which stated, "Consider using 'extraction below the water table' instead of 'underwater extraction' to be more consistent with language used for licences and permits issued under the Aggregate Resources Act". A similar modification is required to Bullet 2 as follows:</p> <p>"Where there is underwater extraction extraction below the water table, no less than 35 percent of the nonaquatic lands of each license is to be rehabilitated to forest cover, which shall be representative of the natural ecosystem in that particular setting; and,".</p>	Suggested modification (LSRCA).

5.2.5.2 e) General Policies – Stormwater Management	The following modification is required: “Stormwater management ponds are prohibited in the Natural Heritage System, unless otherwise approved by the municipality Conservation Authority. ”	Modification required. (LSRCA).
6.2.1 g) Interpreting This Plan	Definitions for natural heritage features and hydrologic features for areas outside the Greenbelt, ORMCP, and LSPP areas are not provided in the Zoning By-law. These features (and Core Features and Supporting Areas) need to be clearly defined within the NEGOP. Minimum vegetation protection zones to these features should also be prescribed.	Modifications required. (LSRCA & YR).
Schedules		
Schedule 4	Include a note that lists the features that make up the natural heritage system. From the schedule it is unclear if all mapped areas are part of the NHS.	Required modification.
Appendix 1 – Map 2 – Highly Vulnerable Aquifers	HVA mapping does not correspond to LSRCA HVA mapping (i.e. SWP HVA mapping).	Modification required (LSRCA & YR).
Mississaugas of the Credit First Nation (October 6, 2022)		
General Comment	Thank you for reaching out to MCFN DOCA for Consultation. The Town of East Gwillimbury does not fall under MCFN jurisdiction.	No action necessary.
Chippewas of Rama First Nation (October 7, 2022)		
General Comment	We appreciate the opportunity to comment on the plan and hope the following comments will be helpful. While we recognize and appreciate the Indigenous Land Acknowledgement section, we do not see any substantial steps outlined to engage with the First Nations associated with the area, specifically the Chippewas of Georgina Island, Beausoleil Island and Rama. It is our experience that other official plans have included active language and steps to improve relationships and determine best steps for consultation practices. We hope that, even if they cannot be adopted into the Official Plan at this time, that the Town and its leadership will consider concrete steps to establishing relationships with those on whose traditional territory the Town now sits.	Modifications suggested to address input and YROP policies 7.1.7 & 7.1.10.

Town of Georgina (October 12, 2022)		
General Comment	Planning Policy staff have reviewed the Official Plan text and mapping and have no comments or concerns to provide.	No action necessary.
Métis Nation of Ontario (October 18, 2022)		
General Comment	<p>Thank you for the project notification. The Lands, Resources and Consultation staff of the Métis Nation of Ontario, have conducted a high-level review of the documents provided and do not have any immediate concerns of impact on Métis rights or interests. In accordance with the Métis Nation of Ontario Statement of Prime Purpose, some of the core concerns of MNO Citizens are below:</p> <ul style="list-style-type: none"> • to promote and foster community development; • to provide care and support necessary to meet the fundamental needs of the citizens of the Métis Nation • to promote the improved health and wellness of the individual, the family and the whole Métis community • to ensure that Métis can exercise their Aboriginal and Treaty rights and freedoms and in so doing, act in a spirit of cooperation with other Aboriginal and non-Aboriginal people; • to re-establish land and resource bases • to protect and preserve the land and waters within our homelands for future generations. <p>I encourage you to read the Statement of Prime Purpose in its entirety (Statement of Prime Purpose - Métis Nation of Ontario (metisnation.org)), and consider the perspective of Métis citizens during future stages of the project.</p> <p>If there are any significant changes to this plan or project please email the Lands, Resource and Consultations Branch at consultations@metisnation.org. We value an ongoing dialogue with municipalities.</p>	For information and consideration.
Southlake Regional Health Centre (October 18, 2022)		
General Comment	<p>Southlake Regional Health Centre understands the impact of provincial and regional planning requirements on local communities and, in particular, the provincial Places to Grow strategy. In this context, continued residential development is expected.</p> <p>It is important for Council to recognize however, that provincial growth policies do not provide for the necessary capital investment to expand hospital infrastructure to meet the health care needs of new residents. At Southlake we</p>	For information and consideration.

	are doing our best to find new and innovative ways to better serve our growing communities and we will continue to do so. Southlake will require Council’s continuing support with respect to supporting local share fundraising and to supporting our efforts to secure necessary funding approvals from the provincial government to help meet the needs of our growing population.	
Enbridge (October 19, 2022)		
General Comment	Thank you for your circulation. Enbridge Gas Inc. does not object to the proposed application, however, we reserve the right to amend our development conditions. Please continue to forward all municipal circulations and clearance letter requests electronically to MunicipalPlanning@Enbridge.com .	For information. No action necessary.
Metrolinx – Development Heavy Rail (Existing Stations) Division (October 28, 2022)		
Schedule 3D: Green Lane Corridor Land Use Plan	Metrolinx-owned parcel PIN 035560781 is designated as Residential Mixed Use (Office Priority Area), High Density Residential, and Institutional. The Institutional designation represents a development constraint on a large portion of the property, limiting opportunities for direct integration between development and infrastructure. The High Density Residential designation would provide the greatest flexibility for future TOC/Development potential. Proposed Revision - The portion of Metrolinx-owned parcel PIN 035560781 currently designated as Institutional be redesignated as High Density Residential on Schedule 3D.	Discussion required. Possible modifications required.
Schedules 2, 3D, 7, and 8	A Minor Collector Road (22m ROW) is proposed to bisect Metrolinx-owned parcel PIN 035560781. Metrolinx requests further consultation on the proposed Minor Collector Road and related property impacts.	Discussion required. Further consultation requested. Possible modifications required.
Schedule 7	Metrolinx requests clarification on the location of the proposed “Schematic Community Trail Linkage” on or adjacent to Metrolinx-owned parcel PIN 035560781 – specifically, its location relative to the rail corridor.	Discussion required. Further clarification requested.



Key Map

	Green Lane Secondary Plan		Restoration Area		Community Centre
	Residential Mixed Use		Environmental Protection Designation		Proposed Elementary School
	Institutional		Special Policy Area		Proposed Secondary School
	Commercial Mixed Use		Major Transit Station Area		Proposed Park
	Neighbourhood Commercial		Major Local Centre		Railway
	Low Density Residential		Office Priority Area		Arterial Road
	Medium Density Residential I		Pedestrian Oriented Route Priority Area		Road
	Medium Density Residential II		Pedestrian Oriented Streets		Proposed Major Collector Road
	High Density Residential		GO Station		Proposed Minor Collector Road
	Parks and Open Space				
	Open Space Special Study Area				

EG
East Guelph

**OFFICIAL PLAN
SCHEDULE 30
GREEN LANE CORRIDOR
LAND USE PLAN**

Prepared by: The Town of East Guelph
© Copyright the Regional Municipality of York, 2022
© Copyright Queens Printer for Ontario, 2010, 2012

0 500 m