



March 30, 2022

Email: [regionalclerk@york.ca](mailto:regionalclerk@york.ca)

Mr. Christopher Raynor, Regional Clerk  
Regional Municipality of York  
17250 Yonge Street  
Newmarket, Ontario L3Y 6Z1

Dear Mr. Raynor,

**Re: SRPI.22.036 - Region of York's Draft Official Plan**

Richmond Hill City Council, at its meeting held on March 23, 2022, adopted the following resolution:

- a) That Council receive staff report SRPI.22.036 regarding the Region of York's Draft Official Plan;
- b) That City Council endorse the comments on the Region of York's Draft Official Plan set out in SRPI.22.036, and in doing so, Council requests that prior to adoption, the Region:
  - i. Amend Map 10 Rapid Transit Network by removing the proposed GO Station at Bayview and 19<sup>th</sup> Avenue and adding a proposed GO Station at Elgin Mills and Newkirk, to service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park; and
  - ii. Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA [**other than the MTSA 48 (the Gormley MTSA)**] to be affordable, in response to the Region's declared affordable housing crisis and to ensure that the Region's target is achieved through the approval of applicable applications.
- c) That York Region be advised of City Council's support for the recommendations set out in Attachment A to staff report SRPI.22.036; and
- d) That City Clerk forward a copy of this report and its attachment to York Region and to the Ministry of Municipal Affairs and Housing as input to the Region's Municipal Comprehensive Review.

Please find attached a copy of the Council endorsed resolution, and a copy of staff report SRPI.22.036.

If you have any questions, please feel free to contact me at (905) 771-9996, ext. 2529.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S. Huycke".

Stephen M.A. Huycke  
Director of Legislative Services/City Clerk

Attachments

### 13. Committee and Staff Reports

#### 13.3 SRPI.22.036 - Region of York's Draft Official Plan

Moved by: Councillor Chan  
Seconded by: Councillor Cilevitz

- a) That Council receive staff report SRPI.22.036 regarding the Region of York's Draft Official Plan;
- b) That City Council endorse the comments on the Region of York's Draft Official Plan set out in SRPI.22.036, and in doing so, Council requests that prior to adoption, the Region:
  - i. Amend Map 10 Rapid Transit Network by removing the proposed GO Station at Bayview and 19<sup>th</sup> Avenue and adding a proposed GO Station at Elgin Mills and Newkirk, to service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park; and
  - ii. Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA to be affordable, in response to the Region's declared affordable housing crisis and to ensure that the Region's target is achieved through the approval of applicable applications.
- c) That York Region be advised of City Council's support for the recommendations set out in Attachment A to staff report SRPI.22.036; and
- d) That City Clerk forward a copy of this report and its attachment to York Region and to the Ministry of Municipal Affairs and Housing as input to the Region's Municipal Comprehensive Review.

#### An Amendment was:

Moved by: Regional and Local Councillor DiPaola  
Seconded by: Mayor West

That clause b) ii, of the main motion be amended to read as follows:



“Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA [**other than the MTSA 48 (the Gormley MTSA)**] to be affordable, in response to the Region’s declared affordable housing crisis and to ensure that the Region’s target is achieved through the approval of applicable applications.”

A recorded vote was taken:

In favour: (7): Councillor Cilevitz, Regional and Local Councillor DiPaola, Councillor Liu, Mayor West, Councillor Chan, Councillor Sheppard, Councillor Muench

Opposed: (2): Councillor Beros, Regional and Local Councillor Perrelli

Motion to Amend Carried (7 to 2)

**Main Motion as Amended:**

Moved by: Councillor Chan  
Seconded by: Councillor Cilevitz

- a) That Council receive staff report SRPI.22.036 regarding the Region of York’s Draft Official Plan;
- b) That City Council endorse the comments on the Region of York’s Draft Official Plan set out in SRPI.22.036, and in doing so, Council requests that prior to adoption, the Region:
  - i. Amend Map 10 Rapid Transit Network by removing the proposed GO Station at Bayview and 19<sup>th</sup> Avenue and adding a proposed GO Station at Elgin Mills and Newkirk, to service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park; and
  - ii. Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA [**other than the MTSA 48 (the Gormley MTSA)**] to be affordable, in response to the Region’s declared affordable housing crisis and to ensure that the Region’s target is achieved through the approval of applicable applications.

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For Your Information and Any Action Deemed Necessary

c) That York Region be advised of City Council's support for the recommendations set out in Attachment A to staff report SRPI.22.036; and

d) That City Clerk forward a copy of this report and its attachment to York Region and to the Ministry of Municipal Affairs and Housing as input to the Region's Municipal Comprehensive Review.

A recorded vote was taken on clause b) ii. of the Main Motion as Amended:

In favour: (7): Councillor Cilevitz, Councillor Sheppard, Mayor West, Councillor Chan, Councillor Liu, Councillor Muench, Regional and Local Councillor DiPaola

Opposed: (2): Regional and Local Councillor Perrelli, Councillor Beros

Clause b) ii. of the Main Motion as Amended Carried (7 to 2)

A recorded vote was taken on clause b) i. of the Main Motion as Amended:

In favour: (8): Councillor Cilevitz, Regional and Local Councillor DiPaola, Councillor Liu, Councillor Sheppard, Councillor Muench, Councillor Chan, Councillor Beros, Mayor West

Opposed: (0): None

Abstain: (1): Regional and Local Councillor Perrelli

Clause b) i. of the Main Motion as Amended Carried (8 to 1)

A recorded vote was taken on clauses a), c) and d) of the Main Motion as Amended:

In favour: (7): Councillor Cilevitz, Councillor Liu, Councillor Beros, Regional and Local Councillor DiPaola, Councillor Sheppard, Councillor Chan, Mayor West

Opposed: (2): Councillor Muench, Regional and Local Councillor Perrelli

Clauses a), c) and d) of the Main Motion as Amended Carried (7 to 2)

**The complete motion to read as follows:**

Moved by: Councillor Chan  
Seconded by: Councillor Cilevitz

a) That Council receive staff report SRPI.22.036 regarding the Region of York's Draft Official Plan;

- b) That City Council endorse the comments on the Region of York's Draft Official Plan set out in SRPI.22.036, and in doing so, Council requests that prior to adoption, the Region:
- i. Amend Map 10 Rapid Transit Network by removing the proposed GO Station at Bayview and 19<sup>th</sup> Avenue and adding a proposed GO Station at Elgin Mills and Newkirk, to service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park; and
  - ii. Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA [**other than the MTSA 48 (the Gormley MTSA)**] to be affordable, in response to the Region's declared affordable housing crisis and to ensure that the Region's target is achieved through the approval of applicable applications.
- c) That York Region be advised of City Council's support for the recommendations set out in Attachment A to staff report SRPI.22.036; and
- d) That City Clerk forward a copy of this report and its attachment to York Region and to the Ministry of Municipal Affairs and Housing as input to the Region's Municipal Comprehensive Review.

Carried



## Staff Report for Council Meeting

Date of Meeting: March 23, 2022

Report Number: SRPI.22.036

Department: Planning and Infrastructure

Division: Policy Planning

**Subject: SRPI.22.036 Region of York's Draft Official Plan**

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### Purpose:

To provide a summary of the Region of York's Draft Official Plan, and to seek Council's endorsement of staff's comments on same, which will be forwarded to the Region for consideration through its Municipal Comprehensive Review process.

### Recommendation(s):

- a) That Council receive staff report SRPI.22.036 regarding the Region of York's Draft Official Plan;
- b) That City Council endorse the comments on the Region of York's Draft Official Plan set out in SRPI.22.036, and in doing so, Council requests that prior to adoption, the Region:
  - i. Amend Map 10 Rapid Transit Network by removing the proposed GO Station at Bayview and 19<sup>th</sup> Avenue and adding a proposed GO Station at Elgin Mills and Newkirk, to service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park; and
  - ii. Amend Draft ROP policy 2.3.2.3 to require a minimum of 35% of residential units in **each** new development application located within a Regional Centre or MTSA to be affordable, in response to the Region's declared affordable housing crisis and to ensure that the Region's target is achieved through the approval of applicable applications.
- c) That York Region be advised of City Council's support for the recommendations set out in Attachment A to staff report SRPI.22.036; and,
- d) That City Clerk forward a copy of this report and its attachment to York Region and to the Ministry of Municipal Affairs and Housing as input to the Region's Municipal Comprehensive Review.

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### Contact Person:

Chun Chu, Senior Planner (Policy) 905-771-5493  
Sybelle von Kursell, Manager of Policy 905-771-2472

### Report Approval:

**Submitted by:** Kelvin Kwan, Commissioner of Planning and Infrastructure

**Approved by:** Darlene Joslin, Interim City Manager

All reports are electronically reviewed and/or approved by the Division Director, Treasurer (as required), City Solicitor (as required), Commissioner, and City Manager. Details of the reports approval are attached.

### Background:

The Region of York is undertaking a Municipal Comprehensive Review (MCR) to update its 2010 Regional Official Plan. In 2019, Regional staff prepared a series of background technical studies and proceeded with public consultation throughout 2020 and 2021. Over this period of time, staff have provided Council updates on the MCR process through three staff reports ([SRPRS.20.003](#), [SRPRS.20.004](#), and [SRPI.21.118](#)) and where necessary, Council has provided input into this process through Council resolutions which have been shared with the Region.

In November 2021, the Region released a [Draft Regional Official Plan](#) (Draft ROP) to the public and stakeholders for review and comment. The Region is seeking feedback from the public, including lower-tier municipalities on the Draft ROP by March 31, 2022 so that any proposed amendments may be considered prior to Regional Council adoption of the final ROP in the middle of 2022.

This staff report provides an overview of the Draft ROP. It highlights key proposed changes to the 2010 Regional Official Plan and describes their relevance to Richmond Hill. This report also recommends suggested changes to the Draft ROP to improve its implementation in Richmond Hill. The details of the highlighted policy areas as noted below and their associated comments can be found in Appendix A of this report. As a courtesy to Regional staff, these detailed comments have been shared with staff at the Region of York for their consideration.

### Overview of the Draft Regional Official Plan

The Draft ROP modernizes the current Regional Official Plan that was adopted in 2010. It incorporates updates to Provincial plans and policies, as well as changes to relevant legislation and regulations since 2010. Two key drivers of change for this Draft ROP is the desire for the Region to align closely the provision of infrastructure with the phasing of development to support financial sustainability, and the desire to tackle the Region's affordable housing crisis. These drivers stem from the Region's responsibilities as the

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Housing Service Manager for its nine lower-tier municipalities, and as the provider of essential infrastructure such as water and wastewater, transportation, and transit.

The following is a synopsis of the seven chapters in the Draft ROP:

**Chapter 1: Introduction and Purpose** provides an overview of the purpose of the ROP, identifies its 2051 vision “to create strong, caring, safe communities”, explains the 7 goals of the Official Plan and identifies its three principle land use policy areas: urban areas, agricultural system and natural heritage system. Furthermore, this chapter explains that the Region continues to apply a “triple bottom line” approach to create/maintain sustainability from three perspectives: natural environment, economic vitality, and healthy communities.

**Chapter 2: The Foundation for Complete Communities** sets the Region’s Regional structure as a framework for growth management. It speaks to complete communities that support housing choices and economic development. In addition, this chapter addresses climate change, cultural heritage resources, as well as excess soil management resulting from development.

**Chapter 3: A Sustainable Natural Environment** encompass policies that protect and enhance the Region’s natural heritage system (NHS) and water resource system. The Region promotes environmental planning at a watershed scale and protects natural features and functions in the Regional Greenlands System, both inside and outside of settlement areas. Additionally, this chapter describes how natural hazards such as floodplains and wildland fire are managed.

**Chapter 4: An Urbanizing Region** focuses on growth management and it introduces the concepts of “New Community Area” (whitebelt lands to be phased into settlement areas over the next 30 years) and “Future Urban Area” (lands to be developed post 2051). The Regional urban system now also includes Employment Areas, and the policies on employment lands are more fulsome to reflect Provincial directions. This chapter also updates the Regional intensification hierarchy, which now includes Major Transit Station Areas. Lastly, the Region continues to support infill development in Towns and Villages.

**Chapter 5: Supporting the Agricultural System** provides policies to support the rural areas, agricultural lands, and the agri-food sector across the Region. It expands the permission of agricultural and agricultural-related uses. It also sets direction for protecting and managing mineral aggregate resources and their extraction operations. Additionally, this chapter reinforces the preservation of Hamlets while allowing for minor infilling.

**Chapter 6: Servicing Our Communities** describes how growth is supported by infrastructure such as: transportation, transit, water and wastewater servicing, stormwater management, waste management, and energy and utilities. The Region



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reiterates the importance of integrating infrastructure planning with land use planning by phasing development and optimizing existing infrastructure.

**Chapter 7: Implementation of the Official Plan** sets directions for measuring and monitoring the progress of the goals and targets identified in the ROP. To aid this endeavour, the Region promotes public engagement and partnerships. This chapter also outlines the process for considering changes to local and Regional official plan policies. Finally, the chapter concludes with guidance on how to interpret the ROP, along with rules for matters relating to transition.

Beyond the written text, the Draft ROP contains 18 maps and 1 figure - some of which identify land use designations and Provincially or Regionally delineated areas, while others are ‘overlays’ that are associated with geographic-specific policies. The natural heritage features and water resources maps are based on the latest modelling and best data available at the time when the ROP was being drafted. Notably, new mapping now includes Key Hydrologic Areas that were introduced in the 2017 Greenbelt Plan.

Other major changes to the Draft ROP schedules include the Rapid Transit Network map, the Urban System Overlays, mapping for Major Transit Station Areas, and delineated Employment Areas; these will be described in detail below.

### **Key Changes proposed in the Draft Regional Official Plan (Draft ROP)**

This section highlights key proposed changes to the 2010 ROP that are proposed in the Draft ROP and how they may impact the City of Richmond Hill.

#### **Regional Growth Forecast and Intensification Target**

The Region has updated its growth forecast to project a total of 2.03 million people and 991,400 jobs by 2051. The Region’s forecast is slightly higher than the provincial forecast in the Growth Plan<sup>1</sup>, which projected 2.02 million people and 990,000 jobs in York Region by 2051 (See Table 1, page 16 of the Draft ROP.)

In addition to the total number of people and jobs, the distribution and timing of growth is influenced by the Region’s phased-in intensification targets. In September 2021, [Regional Council endorsed](#) a phased 50-55% intensification target across the Region. This means that at a minimum 50% of new housing units will be directed to the Built-up Area<sup>2</sup> from now to 2041, and the minimum will increase to 55% after 2041.

#### **Growth Forecast, Intensification Rates and Density Target for Richmond Hill**

The Region’s growth forecast allocates 282,800 people and 109,100 jobs to Richmond Hill by 2041. By 2051, the City’s population is expected to reach 319,600 and the number of jobs will be 122,800. These numbers reflect the Provincial growth forecast

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<sup>1</sup> A Place to Grow Growth Plan for the Greater Golden Horseshoe, 2020 permits higher forecasts than those projected in Schedule 3 of the Plan (Policy 2.2.1(1)).

<sup>2</sup> The “Built-up Area” was delineated by the Province in 2008, it generally refers to lands located in the settlement at that time that had some form of development on them.

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assumption that more growth is expected to occur in York Region than in other parts of the Greater Golden Horseshoe during this planning horizon.

In terms of intensification, the Draft ROP envisions that City of Richmond Hill will continue to direct a high percentage of new housing units in the Built-up Area (the City's Built-up Area is identified in Schedule A3 of our [City Official Plan](#)). In the period between 2010 and 2019, Richmond Hill has approved and/or seen construction of 64% of all new residential units within the Built-up Area. Richmond Hill will continue to plan for further intensification to create complete, transit oriented communities.

Outside of intensification areas are Designated Greenfield Areas (DGA) – these areas are within the settlement area, but are not identified as Built-up Area. Local municipalities are to meet or exceed the minimum density targets by 2051. The Region has set the minimum DGA density target for Richmond Hill to be 70 people and jobs per hectare. In Richmond Hill, there are a few remaining pockets of DGA, but the majority of the DGA lands are located in the North Leslie and West Gormley Secondary Plan areas, as well as lands located just south of Bloomington Road, near Yonge Street. The City will continue to monitor the development of these lands and their contribution towards the density of DGA. The locations of the DGA can be found in the Regional Draft ROP, in [Map 1B \(Urban System Overlays\)](#).

### Regional Structure

Broadly speaking, the Region's lands are comprised of three systems: the Urban System, the Agricultural System, and the Regional Greenlands System. Within the Urban System are Community Areas and Employment Areas. Most of the Region's growth will be directed to these two areas. Outside of the Urban System is the Agricultural System. This is where the Holland Marsh Specialty Crop Area, Agricultural Area, Rural Area, and Hamlets lie. These rural and agricultural areas offer a unique 'town and country' lifestyle within the Region while supporting the larger agricultural system. Intertwined with the Urban and Agricultural Systems, is the Regional Greenlands System. This system is comprised of lands that represent the core natural areas and natural linkage areas of the Region that are intended to be protected and enhanced over the long term. Much of the Greenlands System is also designated as part of the Provincial Natural Heritage System within Provincial Plans.

### Urban System and Rapid Transit

In the Draft ROP, the Regional urban system continues to be comprised of the urban area, which includes centres and corridors, as well as Towns and Villages. Newly added to the urban system is Major Transit Station Areas (MTSAs), which is one of the most intensified areas, second only to Regional Centres in the Regional intensification hierarchy. In discussions with Regional staff, they confirmed that the City's proposed intensification hierarchy wherein areas delineated as MTSA can be designated as any one of the City's urban structure elements (i.e., Regional Centre, Key Development Area, Regional Corridor, Local Centre, etc.) is appropriate and in keeping with the policies of the Draft ROP.

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A large factor in the delineation of the urban system's intensification areas is the Region's existing and planned transit system. MTSAs are located in areas served by subway, GO Stations and Bus Rapid Transit stations – which are core arteries of the Region's transit system. Map 10 of the Draft ROP identifies these existing and planned corridors. This map identifies two subway stations in Richmond Hill (the High Tech and Bridge stations), an extension of the subway beyond these stations to Major Mackenzie Drive, four existing GO Stations, and two "GO Stations subject to further study." Furthermore, this map identifies existing BRT corridors along Highway 7 and Yonge Street, as well as planned corridors on Yonge Street extending to Bloomington Road, and corridors across Major Mackenzie Drive and along Leslie Street extending to Major Mackenzie Drive.

Of note, however, is the proposed GO station at Bayview and 19<sup>th</sup> Avenue. When asked, Regional staff indicated that this station was identified by the Region in its 2002 Transportation Master Plan, which predates Oak Ridges Moraine conformity work by the Region and City. Upon further investigation, City staff note that the location of this future station is not advisable given that the majority of lands in this area are designated as Oak Ridges Moraine Countryside and Natural Core. On the other hand, City staff note that a new GO station at Elgin Mills and Newkirk, would be well served by residents and businesses in the Yonge and Bernard Key Development Area, the Yonge Street Corridor, and within the Newkirk Business Park. Identification of a "proposed GO Station" in the ROP and in the City's OP Can inform future Regional Transportation Plan updates undertaken by Metrolinx, who is ultimately responsible for the identification and timing for such stations.

### **RECOMMENDATION #1:**

The Map 10 of the Draft ROP be amended to remove the proposed GO station at Bayview and 19<sup>th</sup> Avenue, and that a new proposed GO Station be identified at Elgin Mills and Newkirk Road.

### **Major Transit Station Areas (MTSAs)**

The Growth Plan introduced MTSAs as intensification areas along priority transit corridors and subway lines. Upper-tier and single-tier municipalities are to delineate the boundaries of MTSAs and set minimum density targets for each area. As such, York Region has worked with local municipalities since 2019 to establish MTSAs. The proposed MTSAs, their boundaries and minimum density targets are provided in [Appendix 2](#) of the Draft ROP.

The Region originally identified 16 MTSAs in the City of Richmond Hill, but the City recommended that two emerging MTSAs be added as per Council's direction in response to the staff report SRPRS.20.004. Furthermore, the City recommended that a ratio of resident-to-job target also be set for each MTSA as per Council's direction in response to the staff report SRPI.21.055. The ratio is a mechanism to require an appropriate mix of land uses in MTSAs, which is necessary for building complete communities that offer nearby access to housing, local jobs, and essential services.

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York Region has accepted the City's recommendation and has in turn incorporated all 18 MTSAs in the Draft ROP. Minimum density targets for these areas range from as low as 50 residents and jobs per hectare (for the Gormley GO station) to as high as 400 residents & jobs per hectare at Richmond Hill Centre. The Region, however, did not proceed with setting of resident-to-job targets. Instead, the Region gives discretion to local municipalities to plan for the right mix of housing and employment opportunities according to the local context. Moreover, the Region delegates to local municipalities the designation of land uses within MTSAs and the determination of how minimum density targets will be achieved.

On top of delineating MTSAs, the Region has taken an extra step to designate most of the MTSAs as 'protected major transit station areas' (protected MTSAs). There are benefits for doing so, the chief being that the *Planning Act* shelters protected MTSAs from certain appeals, including matters relating to: land use permissions, minimum or maximum densities of buildings and structures, and if relevant, minimum or maximum heights of buildings and structures.

### **Housing Affordability**

The provision of affordable housing is a major factor for the Region to achieve its forecasted population growth. The Region is tackling its declared affordable housing crisis by strengthening housing policies and providing greater direction to expand housing options.

Specifically, the Draft ROP affordable housing targets are updated to require a minimum 35% of new housing to be affordable in Regional Centres and Major Transit Station Areas (policy 2.3.2.3). This target builds on the 2010 ROP policy by extending the affordable housing target to Major Transit Stations, whereas the current ROP only applies it to Regional Centres and Key Development Areas. However, City staff note that this policy does not explicitly require that all residential development applications within these areas provide affording housing that meets or exceeds this target. This is a concern given that when a development is short of the 35% target, future development elsewhere in these areas will need to make up for this shortfall.

#### **RECOMMENDATION #2:**

The Draft ROP policy 2.3.2.3 requiring affordable housing in Regional Centres and MTSAs be amended to explicitly specify that the minimum affordable housing target applies to all new development applications proposing residential development within those areas. This amendment ensures that all development in these areas are providing their fair share of affordable housing each time a new application is approved.

Outside of Regional Centres and MTSAs, the affordable housing target is set at 25%. This proposed policy (2.3.2.2) clarifies that the 25% affordability target is intended to be separate from the 35% target. To support the achievement of this target, Draft ROP

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policies include direction to provide for “missing middle” housing and “gentle density.” These are concepts that will be explored in the City’s Official Plan Update process. It should be noted that the City’s adoption of Official Plan Amendment 23 now permits additional residential units (or secondary suites) in ground-related housing. These units will count towards the minimum 25% affordable housing target for development outside of Regional Centres and MTSAs.

In addition to affordable housing targets, the Region has also created targets for the number of new purpose-built rental housing (See Table 2, page 26 of the draft ROP). Richmond Hill is required to build a minimum of 1,500 purpose-built rental units from 2021 to 2031, and another 1,250 units from 2031 to 2041. Alongside these new targets are updates to the definition of affordable rental housing to reflect current practices in measuring affordability. This definition aligns with the proposed definition provided in the City’s Affordable Housing Strategy, and should the ROP definition be approved, the City can update its official plan accordingly.

Regional staff acknowledge that these targets put a larger onus on municipalities to facilitate the development of affordable market housing. As such, to assist local municipalities achieve the Draft ROP targets, the Region is in the process of developing an Affordable Housing Implementation Plan. Furthermore, the Draft ROP directs local municipalities to prepare an affordable housing strategy. To that end, Regional staff have confirmed that the City’s Council endorsed [Affordable Housing Strategy](#) satisfies this policy.

Also, to assist with achieving the affordable housing target in Regional Centre and MTSAs, the Regional designation of protected MTSAs will give local municipalities the authority to implement inclusionary zoning in these areas. In this regard, the City is in lock-step with the Region, whereby we have identified inclusionary zoning as a potential tool in our Affordable Housing Strategy.

### Employment Areas

The Growth Plan requires upper-tier and single-tier municipalities to designate Employment Areas. As such, through the MCR process, the Region has worked with local municipalities to identify and map Employment Areas that are considered ‘regionally significant’. Local municipalities will have the discretion to add any other Employment Areas that are deemed ‘locally significant’ within their own official plans. The locations of Employment Areas can be found in [Appendix 1](#) of the Draft ROP.

Besides delineating Employment Areas, the Growth Plan also requires the Region to assign density targets for these areas. Accordingly, the Draft ROP has set density targets for specific “Employment Area Zones”. For Richmond Hill, the Region has assigned a density target of 55 jobs per hectare for the Newkirk Business Park, the Barker Business Park, and for lands designated Office in the North Leslie Secondary Plan. For lands in the Headford Business Park and Beaver Creek Business Park, which

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presently host several office buildings, the Region has assigned a density target of 70 jobs per hectare.

Based on 2019 employment data<sup>3</sup>, the average density across all four business parks in the City is nearly 48 jobs per hectare. If vacant lands are excluded from the analysis, the average density across the developed lands in the business parks rise to 56 jobs per hectare. Therefore, staff is confident that through intensification and the introduction of businesses that can operate more compact, multi-storey buildings, the City can meet the Region's density targets. Nevertheless, the City should be mindful of the growing demand for warehousing and distribution centres, as well as data centres. These facilities tend to locate in Employment Areas and often yield very low job densities. But at the same time, they provide the business infrastructure that enables many to work from home in the Region and they support businesses throughout the Greater Toronto Area.

The purpose of designating Employment Areas and prescribing their density targets is to protect these lands for manufacturing / warehousing, office, and associated retail or ancillary jobs.<sup>4</sup> These lands are vital for economic and job growth. Yet, there is significant pressure to convert employment lands into residential or other land uses - and York Region is not immune to such pressure. Hence, as a part of the Regional MCR, York Region and its lower-tier municipalities worked together since 2019 to assess requests for employment land conversions. In February 2020, City Council approved five out of eight site-specific conversion requests initiated by private landowners and three area-specific conversion requests initiated by the City. This decision was made in response to the staff report SRPRS.20.003. These sites have since been accepted by the Region and they are incorporated in the Draft ROP.

### **Agricultural System**

As noted above, the Draft ROP now speaks to an Agricultural System, which includes prime agricultural areas (refined from the Provincial Prime Agricultural area mapping), rural lands, as well as lands where mineral aggregate extraction potential exists. The Draft ROP's goal for this system is to protect and support the viability of the agricultural system and the agri-food sector in York Region, which was not as pronounced in the 2010 ROP.

As directed by Provincial guidelines, the Region has delineated the most northeastern concession block in Richmond Hill as a Prime Agricultural Area (see Map 1A of the Draft ROP). City Council endorsed this delineation in February 2020.<sup>5</sup> The draft Regional policies regarding Prime Agricultural Areas reflect Provincial directions for more flexible and expanded uses in agricultural areas. These policies will enable existing and new agricultural and agricultural-related businesses to thrive in the City.

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<sup>3</sup> 2019 Region of York Employment Survey (pre-pandemic)

<sup>4</sup> As per the definition of Employment Areas in the Growth Plan.

<sup>5</sup> See staff report SRPRS.20.004

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These changes are acknowledged in the Key Directions Report for the Official Plan Update, which also directs that the most northeastern concession block of Richmond Hill be identified as Prime Agricultural Area, while the balance of lands outside of the settlement area function as rural lands. These changes will not only support the agri-food business, but will also support tourism, green energy production, and other uses that are complementary to the adjacent agricultural areas as well as urban areas.

### **Mineral Aggregate Resources**

The Draft ROP updated its Mineral Aggregate Resources map to show ‘secondary mineral aggregate resource areas’ in Richmond Hill.<sup>6</sup> These resources lie almost entirely within the Oak Ridges Moraine, as shown on Map 8 of the Draft ROP. The [current enforce ROP](#) does not show this information, thus, City staff are analyzing Map 8 and its associated policies to determine what implications, if any, this new information would have for our Official Plan Update.

### **Greenlands System and Water Resource System**

In collaboration with local conservation authorities, the Region has updated its ROP maps to reflect changes in the natural heritage system and water resource system. In particular, Key Hydrologic Areas have been added to show significant groundwater recharge areas (including ecologically significant groundwater recharge areas), highly vulnerable aquifers, and water contribution areas.

The Draft ROP policies regarding the Natural Heritage System (NHS) and Water Resource System continues to protect the systems as a whole as well as features that occur outside of the NHS. They allow for further refinement to natural feature mapping within settlement areas through local official plan updates and supporting natural heritage evaluation or environmental impact studies. However, refinements to the Natural Linkage Areas and Natural Core Areas in the Oak Ridges Moraine Conservation Plan or the NHS in the Greenbelt Plan are prohibited, as per the Provincial plans.

### **Wildland Fire and Excess Soil Reuse**

Two new land use planning matters that are introduced in the Draft ROP are the management of excess soil and wildland fire. The Draft ROP requires local municipalities to develop excess soil reuse strategies and create official plan policies that incorporate best practices for the management of excess soil generated and fill received during development or site alteration, including infrastructure development. Furthermore, municipalities are required to regulate the removal of topsoil.

With respect to wildland fire, the Region requires local municipalities to develop policies to address wildland fire hazard, but it offers no direction on how to achieve this. Further,

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<sup>6</sup> The secondary mineral aggregate resource areas align with mapping in the Provincial Aggregate Resources Inventory Paper.

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the Draft ROP does not contain Regional mapping to show areas of potential wildland fire hazard or potential areas for the storage or prohibition of excess soil.

Due to limited directions from the Region, Richmond Hill will need to rely on available Provincial guidance materials to develop the policies and potential mapping related to excess soil reuse and wildland fire. One of the first steps will be the review of woodland data to better gauge where heightened risks of wildland fire can occur in the City. The management of excess soil, however, will need a cross-jurisdictional approach because the movement of soil is not confined to any municipal boundary. For instance, construction sites within the City can send excess soil outside of Richmond Hill, and conversely, excess soil generated by construction activities outside of Richmond Hill can be received within the City.

In discussions with Regional staff about these two matters, staff have noted that they will assist lower-tier municipalities through ongoing coordination of meetings to assist with the implementation of these and other policies that require cross-jurisdictional consideration.

### **Financial/Staffing/Other Implications:**

This report has no financial or staffing implications. The review of the Draft ROP is a part of the ongoing engagement with York Region's MCR process, and this work is included in the City's regular operations.

### **Relationship to Council's Strategic Priorities 2020-2022:**

The comments and recommendation contained in this staff report supports Council's Strategic Priorities by:

- Ensuring Council and the Richmond Hill public are aware of the Draft ROP and its implications on planning in Richmond Hill.
- Providing the Region with constructive feedback about the Draft ROP, which ensures that Regional policies supports City priorities regarding matters such as: fostering a sense of belonging across the Region, including the City of Richmond Hill, and ensures that planning for the Region balances growth while protecting the natural and rural environment.
- Confirming that the Council endorsed [key directions](#) of our Official Plan Update are aligned with the Draft ROP, which improves the efficiency and cost-effectiveness of our Official Plan Update process.

### **Climate Change Considerations:**

Although climate change is not considered in this staff report, the report generally supports the Draft ROP, which includes Regional policies that address climate change mitigation and adaptation.



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### Next Steps:

City staff in the Core Team of the Official Plan Update have reviewed the Draft ROP. The detailed and technical comments arising from the review have been shared with the Region through the Local Municipal Working Group. A copy of these comments is attached in Appendix A of this staff report.

In order to meet the Region's timeline, the City should send this staff report, along with the high level comments and recommendations to the Region before March 31, 2022. As the Region awaits feedback from local municipalities, Regional staff are meeting with various landowners and stakeholders to solicit feedback. Following this, Regional staff will consider all comments comprehensively and revise the Draft ROP accordingly prior to bringing it forward for Regional Council adoption. As noted in the Places to Grow Act, the Region has until July 1, 2022 to update its ROP. Once adopted, and subject to Provincial approval, the new ROP cannot be appealed as per the *Planning Act*.

### Conclusion:

This staff report contains high level comments and recommendations on the Draft ROP. The comments and recommendations in this report have a direct impact on the City's Official Plan Update whereby the City's official plan policies and mapping must conform to the Regional Official Plan. Therefore, it is imperative that the City provide its feedback on matters that will ultimately shape Richmond Hill over the long-term. Based on staff's review, the Draft ROP forms an excellent basis for updates to the Official Plan as there is much alignment between the Draft ROP and the Key Directions for the Official Plan Update. Nevertheless, staff have shared technical comments for Regional staff's consideration and have identified two key matters: one related to a proposed GO station on Map 10 Regional Transit Network and, and second, an implementation concern related to the Region's affordable housing target for development in Regional Centres and MTSAs – both of these require special reconsideration by Regional staff and Council.

### Attachments:

The following attached documents may include scanned images of appendixes, maps and photographs. All attachments have been reviewed and made accessible. If you require an alternative format please call the contact person listed in this document.

- Appendix A – Detailed Comments on the Draft ROP

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### Report Approval Details

Document Title:	SRPI.22.036 Region of York's Draft Official Plan.docx
Attachments:	- SRPI.22.036-Appendix A-Detailed Comments on the Regional Official Plan.pdf
Final Approval Date:	Mar 8, 2022

This report and all of its attachments were approved and signed as outlined below:

**Patrick Lee - Mar 8, 2022 - 11:04 AM**

**Kelvin Kwan - Mar 8, 2022 - 11:22 AM**

**Darlene Joslin - Mar 8, 2022 - 12:35 PM**



**Appendix A to SRPI.22.036**  
**Detailed Comments on the Region of York's**  
**Draft Regional Official Plan**

## Comments on the Draft Regional Official Plan (December 2021 Version) Submitted by the City of Richmond Hill

### Chapter 1: Introduction and Purpose

Policy #	Comment	Page #
n/a	The list should also acknowledge that Centres and Corridors be recognized as places that support a substantial amount of employment uses, i.e. population serving and office jobs.	9
n/a	There are some inconsistencies between second last paragraph on page 6 (Section 1.1) and paragraph 3 on this page (page 10) and the figure at the bottom of the page that should be rectified.	10

### Chapter 2: The Foundation for Complete Communities

Policy #	Comment	Page #
preamble	Paragraph 3 states "Guided by this overall planning vision..." however the preceding paragraphs do not seem to be providing a "planning vision" - consider clarifying this.	13
2.1.4	Per comments regarding Map 1B - the policy indicates that this map identifies components of the urban system. However, what is shown and described are various areas that are intended to be measured to determine whether policies of the ROP are being appropriately implemented by tracking the density of development or how the area is intensifying. To minimize confusion, this policy and mapping should be clarified. (See also comment re: Policy 2.1.4 (b) and d and e)	14
2.1.4. d and e	Is there consideration to combine sub points d) and e) to recognize the overlap between MTSAs and Regional Centres and Corridors rather than identifying these as separate components?	14
2.1.5	This policy does not make mention of other relevant Provincial Plans that have land use planning implications for the Region, such as: Lake Simcoe Protection Plan, Parkway Belt West Plan, and it also does not make reference to the Growth Plan Natural Heritage System.	14

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>page 14 and others</b>	While the November 25th version of the ROP includes changes with respect to the intensification target (50% between 2021 and 2041, and 55% between 2041 and 2051) - these changes have not been made to all sections of the ROP. Please review and update accordingly.	14
<b>2.2.5</b>	Is there, or should there be, any prioritization for the principles?	16
<b>2.2.17</b>	"2.2.17 To work with development proponents on alternative infrastructure initiatives to reduce financial risk to the Region."  It would be helpful if the Region explained in the policy or definition what are 'alternative infrastructure initiatives'.	17
<b>2.2.8</b>	For clause (d), would recommend rewording to "protection and enhancement of the Regional Greenlands system and agricultural areas" given that other parts of the ROP references the protection and enhancement of the Regional Greenlands system. This provides consistency.	17
<b>2.3.2</b>	Policy 2.3.2 should also speak to communities being planned in a manner that is sensitive to existing context.	18
<b>2.3</b>	The concept of "15 minute communities" is introduced with a graphic in Section 2.3 Supporting Complete Communities, but while the policies in this section speak generally to walkable and complete communities, none of the policies actually specifically reference the benchmark / concept of a 15 minute walk. The first reference is actually 60 pages later into the document, within policy 4.4.7.	19
<b>2.3.9</b>	Our local OP policies already support this. At this point, it should be less about what municipalities should be doing, and more about encouraging private development proponents to provide access and to develop healthy and locally grown food and agricultural products.	19
<b>2.3.13</b>	This policy should be reframed so that the term "communities" is replaced with "development". So it reads: "That development shall be designed..."	20
<b>2.3.16</b>	Replace the term "communities" with "development". Proponents of development should be designing their site-specific developments to prioritize active transportation through this policy, not communities - this is how communities will evolve to become walkable locations where the movement of people is prioritized.	21

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>2.3.19</b>	May want to consider adding "where appropriate" language to 2.3.19 a) as maximum parking provisions are not always appropriate. We have had issues with maximum parking requirements when changes of use occur and a commercial unit previously operating as a medical clinic with a higher parking requirement changes over to a retail location that requires less parking and creates a situation of non-compliance.	22
<b>2.3.1.6</b>	Edit lead in sentence: "To encourage and work with local municipalities, ...". Given that certain financial powers are limited to the Region under a two-tier system, the Region may need/could be involved in programs related to financial incentives (e.g., Local Improvement Charge/PACE programs for building energy retrofits as per policy 2.3.1.14).	23
<b>2.3.1.9</b>	Is there a terms of reference for "health, environmental and air quality impact study"? Are they to be provided for all development applications? Note: it is not referenced in Section 7.3.11.	23
<b>2.3.1.10</b>	Is there a minimum distance from "known air emissions sources" that we should apply to determine when studies need to be requested regarding mitigation?	24
<b>2.3.1.13</b>	Are there corresponding buffer policies that support this policy regarding stormwater management?	24
<b>2.3.1.16</b>	Periodic updates to sustainable development programs should also aim to achieve: "climate equity targeting areas experiencing higher rates of energy poverty, urban canopy deficiency and limited transportation options".	24
<b>2.3.1.16</b>	Update text to include alternative and district energy. E.g., "That York Region and local municipalities develop, implement and periodically update sustainable development programs to achieve: d. increase in the use of alternative and renewable energy generation options and district energy systems;"	24
<b>2.3.2.2 and 2.3.2.3</b>	It would be appreciated if wording could be added to clarify the responsibility of individual development applications in contributing to achieving these targets. (See recommendation in Staff Report SRPI.22.036)	26
<b>2.3.2.2 and 2.3.2.3</b>	The requirement for affordable housing should also include the requirement that these units vary in range of sizes so that they are able to accommodate families and larger households.	26

Policy #	Comment	Page #
<b>Table 2</b>	The targets should be noted as "minimum" in the table.	26
<b>2.3.2.6</b>	The City's Affordable Housing Strategy proposes that the threshold for lifting the prohibition on demolition of rental housing should be a vacancy rate of 3% or more over three consecutive years for greater certainty that the rental housing market is indeed meeting the needs of residents prior to permitting a demolition/conversion where a reduction in supply results.	27
<b>2.4.1</b>	Policies 2.4.1.1(c), (d), and (e) uses "encourage" for consultation with Indigenous communities when archaeological resources are found to be Indigenous in origin. But, the Provincial Policy Statement 2020 has stronger language and requires engagement with Indigenous communities for identifying and managing Indigenous cultural and archaeological resources (Policy 2.6.5). Consider using the word "shall" instead in the ROP.	33
<b>2.5.1 and 2.5.2</b>	<p>The ROP directs the development of an excess soil reuses strategy and the incorporation of best management practices for excess soil to local municipalities. The Region may want to coordinate the development of such strategies and best management practices across all nine municipalities in order to create consistent practices across municipalities, including fines for illegal placement, amount of excess soils that can be placed or distributed, and mapping of potential areas for storage / prohibition of storage of excess soil.</p> <p>This policy was taken from section 3.4.2 (7) of the Greenbelt Plan. While 2.4.2 (d) of this policy notes "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 or the natural environment, and is compatible with adjacent land uses", this policy should clearly state that placement of excess soil should be located outside of the Key Natural Heritage Features and Key Hydrologic Features, plus their associated buffers.</p>	36



## Chapter 3: A Sustainable Natural Environment

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>3.1.3</b>	It is unclear what is meant by "establish" where it reads: "... official plans shall identify and include policies to establish and protect the Regional Greenlands System and Water Resource System from development and site alteration" Do you mean "delineate" Regional Greenlands System and Water Resource Systems based on the mapping: Maps 2, 4, 7, 12A and 12B ?	39
<b>3.1.6</b>	In line with the overall goal of Section 3, and the specific objective for 3.1, this policy should include restore or enhance linkages, in addition to maintain them and their related functions.	39
<b>3.1.1</b>	To implement watershed policies, the ROP should provide mapping that identifies the watersheds and sub-watersheds that have a plan and any that may not, so that it is clear what to refer to when making a planning application and also to understand the scale at which these plans should be developed. It would also be helpful to recognize Conservation Authorities for their role in developing, monitoring and implementing these plans.	41
<b>3.1.1.2(d)</b>	Should the watershed planning policies also "protect, improve and restore" key hydrologic areas and their functions?	41
<b>3.2.5 (c/d)</b>	Stormwater management facilities are infrastructure, and should be treated as such, recommend moving stormwater management systems/facilities from subclause (c) to subclause (d) (with new infrastructure), that way it is also subject to subclause (i) no other reasonable alternative exists and if an approved EIS demonstrates that it can be constructed without negative impacts ..."  Subclause (c) would pertain only to passive recreation.	43
<b>3.2.5 (e)</b>	What is a "linear valley"? Are these hazard lands?	43

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>3.2.5.c</b>	Within Chapter 3, passive recreational uses are associated with both "non-motorized trails" (3.2.5.c) and "trails" (3.4.12) in the document, as well as with the development of a regional trails network that connects to the Regional Cycling network (3.2.8), which in part (on-road dedicated facilities) permits motorized bicycles (e-bikes). Suggestion that the use of "non-motorized trails" within the definition of "Passive Recreational Uses" may be incongruent with emerging consideration and regulation of the full spectrum of micromobility devices at local levels. Some motorized uses are likely to be permitted on these trail systems (e.g., e-bikes).	43
<b>3.2.7</b>	Suggest including wording that would allow land trusts and conservation authorities to perform land severances for the purpose of land acquisition and protecting lands in perpetuity. This was brought up at the York Region Land Securement Working group by several organizations, and would be in alignment with the York Region Greening Strategy.	43
<b>3.3.5</b>	Please clarify that this policy regarding comprehensive master environmental servicing plans can apply on a city-wide basis in addition to Secondary Plan areas.	45
<b>3.3.6</b>	This water budget policy should indicate the outcome it is seeking - e.g. no negative impact (?)	45
<b>3.3.9</b>	This policy should indicate the outcome it is seeking - to what level must these Best Management Practices aspire?	46
<b>3.4.10</b>	This policy exempts proponents of buildings or structures related to agriculture from preparing an Environmental Impact Study (EIS), however, won't they need to prepare an EIS to identify the feature and its boundary to then create a 30m buffer? As such, perhaps the policy can indicate that they are exempt from having to identify impacts of proposed development on the feature.	50
<b>3.4.12</b>	Trails should avoid Key Natural Heritage Features (KNHF) and Key Hydrologic Features (KHF). The Natural Heritage Reference Manual suggests trails (suitably designed) can be within buffers; however, the purpose and intent of the buffer (i.e., to protect the KNHF/KHF) should not be undermined by the provision of the trail.  Regarding the need for an EIS, it should also demonstrate that the construction/development of a trail will not result in a negative impacts, not just the future uses of the trail.	50

Policy #	Comment	Page #
3.4.9	This policy (and others) appear to make reference to an Environmental Impact Study (EIS), in replacement for a Natural Heritage Evaluation (NHE) which is the current terminology used in the City's Official Plan. Is there a difference between an EIS and NHE, or are they interchangeable? We note that Policy 6.4.8 of the draft ROP references a Natural Heritage Evaluation, but it is not defined.	50
3.4.1	Recommend making the goal: "no loss of wetland". The current wording: "no net loss" is in conflict with provincial policy that requires protection of significant wetlands and all wetlands within the provincial natural heritage systems.	55
3.4.2.6	This policy does not provide reference to the criteria for woodlands located on the Oak Ridges Moraine (ORM) or Greenbelt. As it is a carry forward from the current ROP, the additional sub-policies (e) to (g) which address significance for woodlands on the ORM, in the Greenbelt Natural Heritage System (NHS) and in the Lake Simcoe watershed outside of the Greenbelt NHS, ORM and settlement areas.	57
<b>NEW Policy requested (Policy 2.2.29 From the 2010 ROP)</b>	<p>We request that the following policy (2.2.29) from the 2010 ROP not be deleted as Technical papers associated with the ORMCP, Lake Simcoe Protection Plan and the Greenbelt Plan are being used and referenced.</p> <p>Please re-state the policy to read:</p> <p>"That the technical papers associated with the Oak Ridges Moraine Conservation Plan, Lake Simcoe Protection Plan and the Greenbelt Plan be consulted to provide clarification in implementing the policies related to key natural heritage features and key hydrologic features within the Provincial Plans."</p>	new

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>NEW Policy requested (Policy 2.3.31 from the 2010 ROP)</b>	Policy 2.3.31 from the 2010 ROP should not be deleted: "To work with the conservation authorities and local municipalities to identify remediation and mitigation opportunities for hazardous lands and hazardous sites." It is important that the commitment to partnerships in this regard is formalized in this regard as the CAs and municipalities have different roles and tools that can be used for the protection and enhancement of these areas.	new

## Chapter 4: An Urbanizing Region

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>4.1.1 (c)</b>	It would be helpful to clarify that the "overlay" reference to Map 1B is a means to measure where targets are set - these are 'monitoring' areas - more so than land use. Map 1B also is important with respect to phasing of development - it ties in with policy 4.2.2.4 which requires a population of 1.5 million before a secondary plan related to new community areas can be approved.	64
<b>4.1.2</b>	<p>The last sentence states: "The intent of Map 1B is provide further policy direction for where higher levels of intensification are to be promoted and how the Urban System is to be phased and developed in the long term."</p> <p>In this sentence, insert the word "to" between "provide" and "further", and suggest that you change the word "promoted" to "directed".</p> <p>The policies of the ROP are necessary to provide direction for intensification for local municipalities and for proponents of development.</p>	64

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>4.2.1.8 (b)</b>	Add active transportation to: b. a transit plan is completed in consultation with York Region Transit, which identifies transit routes and corridors, co-ordinates transit with land use patterns and active transportation; and ensures the ability to integrate transit into the community;	70
<b>4.2.1.8 (g)</b>	This policy speaks to a 'reduced' parking standard, however it does not indicate from what it is reduced. It should be clarified.	70
<b>4.2.1.9</b>	This policy makes reference to "future transit corridors", however it is unclear what corridors are being referred to, either in this ROP, provincial Plan or other legislation. We note that Map 10 does not explicitly illustrate any "future" transit corridors.	70
<b>4.2.2.4</b>	Please clarify what is meant by "early stage" in the text at the bottom of page 72 with respect to service delivery in new communities.	72
<b>4.3.8</b>	Please clarify what would be considered to be a "complementary employment use".	74
<b>4.3.14</b>	e) stipulates that other uses in employment areas where individuals reside on a temporary or permanent basis are not permitted in employment areas.  Interpretation of this policy could suggest that hotels are included in this, despite hotels being commonplace in many employment areas across York Region. It is unclear whether this is in fact a policy direction the Region is introducing (i.e., limiting hotels within employment areas). If that is not the case, then it suggested that the words "not including hotels or equivalent" be included in the policy.	75
<b>4.3.15</b>	Please clarify what is an "accessory institutional use" in the context of this policy.	75
<b>4.4</b>	This section makes reference to "strategic growth areas" (SGA) as they are listed in Policy 4.1.3 (a). However, the definition for Strategic Growth Area provided in Section 7 is much broader than what is provided in the list in policy 4.1.3 (a). As such, either the definition for SGA should change, or this term should not be used in relation to many of the policies in Section 4.4.	77
<b>4.4.4</b>	The scale of development needs to be in accordance with local context and in a form that will meet or exceed the minimum density target, as opposed to "reflecting the intensification hierarchy" which only speaks to where the majority of development is expected to be directed in accordance with policy 4.1.3.	78

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>4.4.8</b>	This policy should clarify that larger family type units are encouraged within multi-unit buildings.	78
<b>4.4.12</b>	The reference to hierarchy is not correct, as there is considerable variation in terms of potential buildout of the areas within the individual tiers of the hierarchy, even among the four Urban Growth Centres, let alone the 78 MTSA's. It may be more appropriate to state that density and height targets shall be established to implement the Regional minimum targets and also in accordance with local context and available or planned infrastructure to support growth and development.	79
<b>4.4.15</b>	Note that Map 10 does not identify "future rapid transit corridors."  Also, the policy directs to plan for "higher density" development, but does not say higher than what. Perhaps this could be reworded to direct planning for future development that is commensurate with the planned transit for the area?	79
<b>4.4.16</b>	The term "missing middle" is used in this policy. In the Richmond Hill Key Directions Report we consider triplex, quadraplex, townhouses and walk-up apartment buildings to be "missing middle." However, these building types are listed in the ROP's definition of low-density. The definition of "missing middle" is quite vague - but seems to allude to mid-rise multi-unit development. As such, it may be more easily understood if the policies simply referred to the term "mid-rise development", rather than "missing middle."	79
<b>4.4.22</b>	This policy maybe directing major office too far afield when it suggests that it be directed to (non-MTSA) Local Centres and Corridors.	80
<b>4.4.26</b>	Similar to Policy 4.2.1.6, there needs to be a similar policy requiring secondary plans and planning applications in strategic growth areas to demonstrate how development conforms to local municipal community energy plans as well as the Region's Energy Conservation and Demand Management Plan. By doing so we create opportunities to incorporate renewable/ alternative/ district energy/ local generation systems where they are most feasible (i.e., Regional Centres, many MTSA's and even within some employment areas).	80
<b>4.4.26 (I)</b>	This policy speaks to public benefits through both private and public development and may be better presented through two separate policies.	81

Policy #	Comment	Page #
4.4.1	<p>In the preamble to this policy section it states that second to Regional Centres and Subway Station MTSA's, all of the other MTSA's will have higher density and scale than Local Centres. However, the MTSA's vary across the City and Region. In Richmond Hill we have MTSA's that are UGC and KDAs as well as one that is partly located in a hamlet. Some of these MTSA's may have higher density than a local centre and some will not. The language in this section needs to be mindful of the extreme variation among these MTSA's. Accordingly, the intensification hierarchy needs to recognize the local context in terms of expectations for density of development over the long-term, from one growth area to the other. Furthermore, it would be helpful to indicate that this hierarchy is about prioritizing where growth should go, thereby indicating that priority of growth goes to the build out of those areas at the top of the hierarchy, which also helps to inform when and where Regional infrastructure planning over the 2051 planning horizon. To that end, there are several policy tweaks that should occur. Starting with this policy. It should read as: "That growth and development be directed to in accordance with the Regional intensification hierarchy outlined in policy 4.1.3...."</p>	82
4.4.1.5	<p>Suggest restructuring the policy to encourage/direct these uses to locate in the Regional Centres, and then advocate for subsidies to encourage their location. Or alternatively, major office and institutional uses could be explicitly noted in Policy 4.4.1.6.</p>	83
4.4.2 Preamble	<p>5th Paragraph, where it states: "Each MTSA is unique with its own growth potential and will be planned based on local context and conditions to support and enhance the Regional intensification hierarchy."</p> <p>In addition to this being stated in the preamble, this should be its own policy in Section 4.4.2 to give it more weight. It is important that Council, local municipalities and proponents of development understand that each MTSA is unique, and will not be planned homogenously. This means that density will vary across each, and the MTSA designation does not and should not signify density is the only important factor when planning for MTSA's.</p>	84

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>4.4.2.1 (c)</b>	Does the Region expect that the whole of the MTSAs will be in the Regional Corridor designation of the lower-tier municipal Official Plans? This is not what was proposed when we worked to delineate them, as some included Neighbourhood areas that could support medium density development, such as townhouses.	85
<b>4.4.2.10</b>	This policy speaks to MTSAs that are not yet "Protected", however, there are no policies that speak to the balance of the MTSAs being "protected", nor is there any indication of what is meant by that "label." It is acknowledged that the definition of MTSA states that most are "protected", but it does not make reference to the Planning Act and it gives no indication of what is meant by stating it is 'protected.'	86
<b>4.4.2.8</b>	Consider qualifying that the delineation of MTSAs as required in this policy is for monitoring purposes (since these areas could have more than one land use designation).	86
<b>4.4.23 and 4.4.2.9(j)</b>	These two policies should specify that a proportion of the affordable units should be 3-bedroom or larger units in order to accommodate larger households. The current draft policies are too generic when referring to "a range of compact housing forms and tenures".	80, 86
<b>general language</b>	Some policies in the ROP talk about "best efforts" while others speak to "encourage"; and even further, some speak to "best efforts to encourage" (Policy 4.5.4(e)). Please clarify how will lower-tier municipalities implement these standards.	n/a

## Chapter 5: Supporting for Agricultural System

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>5.1.7</b>	How is Policy 5.1.7 different from Policy 5.1.8 regarding new non-agricultural uses?	95
<b>5.1.12</b>	This policy regarding lot creation defers to the Provincial Plans, this can be challenging for implementation. It would be better to provide the applicable policy directly in the ROP. Also, it is noted that Policy 5.2.6 does provide re: Prime Agricultural Land lot creation. How do these two policies correspond with each other?	96



<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>5.3.2 (c)</b>	Having unserviced parks and major recreational uses both permitted in the same sub-policy seems contradictory. There are many more caveats with respect to major recreation, it should be listed on its own with recognition of subject to meeting other policy requirements.	100
<b>5.3.5</b>	Why is the rural lot creation policy defaulting to consent permissions for lands within the Prime Agricultural Area?	101
<b>5.4.6</b>	Suggest inserting the words "subject to applicable Provincial Plans" before the words "local official plan consent policies" because the Gormley Hamlet in Richmond Hill is also subject to the policies of the ORMCP and the applicable lot creation policies set out in that Plan.	102
<b>5.5.11</b>	Why is a zoning by-law amendment required for portable asphalt plants in Policy 5.5.11? And what does this policy have to do with petroleum (as it references Policy 5.5.21)?	104
<b>5.5.15</b>	How is this policy intended to be implemented? While it may direct public (municipal) developments, how would the policy be implemented for private ones in terms of recovering and recycling manufactured materials?	105
<b>5.5.18</b>	The ROP defers to provincial plans for details regarding proper extraction and rehabilitation of sites of mineral aggregate operations and wayside pits. This is not a user-friendly way to provide directions for land use. The ROP should give details on the policies of the provincial plans.	105
<b>5.5.7 and 5.5.20</b>	Policies 5.5.7 and 5.5.20 seem to be saying the same thing - do they apply to different areas within the Provincial plans?	104, 105

## Chapter 6: Servicing our Communities

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Preamble</b>	Move away from "alternative" or "other" language when describing low-carbon mobility options, as it situates them subconsciously within the dominant car-centric transportation paradigm. Consider "more sustainable" (also used on page 112) or "low carbon" in this case, as the previous sentence references climate change. Possible use of "sustainable modes" as this document outlines at the bottom of page 109. We suggest that the Region review this and make changes where applicable, throughout the document.	107

Policy #	Comment	Page #
<b>Throughout ROP in multiple chapters</b>	We suggest to embed micromobility more prominently and define it within this policy. Micromobility is referenced within this document, and it should be recognized alongside other low-carbon modes. The City's draft TMP Update mobility hierarchy recognizes Micromobility as electrified versions of active transportation modes, such as e-scooters, e-bikes, and cargo e-bikes.	107
<b>6.1.1</b>	"...addressing impacts of a changing climate..." this phrasing makes it sound like transportation is primarily focused on climate adaptation. Could the sentence also make it clear that transportation is key to climate mitigation?	109
<b>6.1.1.1</b>	The Region may want to use the term "sustainable mobility measures" in order to capture micromobility in this policy. Also, shouldn't the Region's Transportation Master Plan be mentioned here? And also an acknowledgement of the Region's role as the transit authority?	109
<b>6.1.1.3</b>	Please elaborate how the proponent would fulfill this policy; the current wording is too broad.  Also, consider adding the words: "to the satisfaction of the Region" at the end of this policy.	109
<b>6.1.1.6</b>	There should be a new policy introduced after Policy 6.1.1.6 that requires development in the Urban Area or Regional Centres, Regional Corridors and/or MTSAs to demonstrate how the proposed development is designed to support the achievement of an overall modal split of 30% during rush hour in the Urban Area and 50% in the Regional Centres, Regional Corridors and MTSAs during rush hour by 2051.  Policy 6.1.1.6 as currently worded does not translate into requirements for development, and it should.	109
<b>6.2.3</b>	What does Policy 6.2.3(d) mean? Are there specific policies that this is referencing? Request to make the language more clear and simple.	111
<b>6.3.2.5</b>	How would this preferential treatment of transit align with accommodation of cyclists and micromobility users? Suggestion to acknowledge this within policy.	115

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>6.3.2.7</b>	<p>Suggest making this language less prescriptive, in part due to potential for different design solutions, and in part for the potential for duplication of necessary infrastructure (e.g., multi-use paths and sidewalks), and lastly, to align with other policies that are more flexible (e.g., Policy 6.3.3.1). Also, add possible use of "active transportation facilities."</p> <p>The policy should be more open-ended to not just be limited to multi-use paths, but also include other types of cycling facilities.</p>	116
<b>6.3.3.4</b>	The typical rapid transit corridor cross-section should also include in-boulevard bike lane options.	118
<b>6.3.3.5</b>	Policy 6.3.3.5 speaks to 6-lane Regional streets, however Map 11 provides streets with varying widths; is there a way that these can be reconciled?	118
<b>6.3.3.27</b>	Policy 6.3.3.27 seems to conflict with policies in Section 3 which requires "no alternative test" for infrastructure; should reconcile these policies as it relates to Key Natural Heritage Features and Key Hydrologic Features.	120
<b>6.3.5.5</b>	Please clarify this policy further. The terms "vicinity" is too general. Does this mean 150m, 250m, 500 metres within the "vicinity" of the airport? or would 5km away still be considered "vicinity". If you were to apply Airport Zoning Regulations, the "Outer Surface Area" alone extends several kilometers out from airport approach surfaces, hence this policy needs to be revised to be more specific.	123
<b>6.3.5.6</b>	Why is policy 6.3.5.6 only limited to the Pickering Airport? The Provincial Policy Statement about airports also speaks to Noise Exposure Forecast / Noise Exposure Projection contours; why are those policies not addressed in the ROP?	123
<b>6.4.8</b>	Does this policy need to clarify that the "employment uses" that are referred here need to be occurring within the settlement area?	125

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>6.4.8 (e)</b>	<p>This is the only policy that references "Natural Heritage Evaluation" (NHE) while the remaining draft ROP consistently references and defines "Environmental Impact Study" (EIS). It is recommended that the ROP uses and defines "Natural Heritage Evaluation" to be consistent with the ORMCP, Greenbelt Plan, and Richmond Hill Official Plan instead of "Environmental Impact Statement".</p> <p>Otherwise, the NHE should be defined in this section, as are other studies, to identify the difference for proponents and reviewers.</p>	125
<b>6.5.4 and 6.5.5</b>	It seems that these policies should be rolled into the other Master Environmental Servicing Plan policies of the ROP to minimize repetition and avoid loss of information.	131
<b>6.5.6</b>	What is intended by the policy? Typically, after development the developer is no longer responsible for the property. Is the policy suggesting that the proponent be responsible in perpetuity or is it intended that the stormwater management works be designed to municipal standards that take into consideration long-term maintenance and cost effectiveness?	131
<b>6.7.10</b>	In addition to design, it might be prudent to consider the phasing and expansion of on-site renewable/alternative energy infrastructure and future connections to coincide with the phasing of development blocks and other servicing infrastructure.	135

## Chapter 7: Implementation of the Official Plan

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>7.2 Figure</b>	This figure provides a partial list of targets to monitor - what about the modal split, affordable housing, intensification, and greenhouse gas reduction emissions? Consider adding population too in support of the phasing policies related to complete communities.	139

Policy #	Comment	Page #
7.3.7	Although (d) provides flexibility to include other matters specified under the Planning Act, it should reflect the most recent update which is supported by further policy direction under the Provincial Policy Statement and Growth Plan on climate resiliency. Suggested edit to include: "sustainable buildings (or development) designed to mitigate greenhouse gas emissions and adapt to changing climate".	141
7.3.8	<p>Included in the list of matters that are not eligible to be exempt from Regional approval should be:</p> <ul style="list-style-type: none"> <li>-Request for employment conversion (should a lower-tier municipality permit it)</li> <li>-Application seeking to permit higher or lower density than what is permitted in an MTSA (should a lower-tier municipality permit it)</li> <li>-Approval of new or changes to Special Policy Areas</li> <li>-Official plan amendments that are pursuant to Section 26 of the Planning Act</li> </ul> <p>Also, what is considered to be "major secondary plan"?</p>	141
7.3.11	<p>The requirement for an Affordable Housing Contribution Plan needs clarification as to what that is and should only apply to applications where housing is proposed.</p> <p>The requirement for an Archeological assessment should only apply where archeological artifacts are likely to be found (i.e., in accordance with the Region's and/or local Archeological master plans).</p> <p>Agricultural Impact Assessments should be required with a certain/defined distance of an agricultural area.</p> <p>Several policies of the ROP call for Master Environmental Servicing Study, yet it is not provided in the table - should it be?</p>	142

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>7.3.11</b>	Consider adding to Table 7: -Stormwater management plan -Excess soil management plan (where major site alteration/excavation is proposed) -Site-specific wildland fire assessment where applicable -Reference (or at least a placeholder) to demonstrating conformity/implementation of the future Community Energy & Emissions Plan. -Source water impact assessment and mitigation plan for development within Significant Groundwater Recharge Areas, particularly if there is storage & handling of organic solvent and Dense Non-Aqueous Phase Liquid (DNAPL)	142
<b>7.4.5</b>	What is the difference between policies a) and b)?	144
<b>7.4.7</b>	Please note that the only maps that identify the Parkway Belt West Plan are those in Appendix 2, and these maps do not include an "underlying land use designation."	144

## Draft Definitions

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Accessory</b>	The term "accessory" is referenced throughout the policies of the ROP, but a corresponding definition does not appear to be included in the definitions section. A definition should be provided.	new
<b>Affordable</b>	To ensure that appropriate affordable housing is provided, and to meet objective of providing affordable housing to larger households, the definition of "affordable" should be expanded to capture core housing need (e.g., housing that is "suitable" and "in good repair.")	147

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Agricultural Area</b>	In the definition of Agriculture, the term "prime" should be explained because this term is referenced throughout the ROP, including within the definition of "rural area". Alternatively, the term "prime agricultural area" may be added as a new definition in the ROP.  (Prime are areas where Canada Land Inventory class 1-3 agricultural lands predominate)	147
<b>Built-Up Area</b>	The definition for Built-Up Area could be clearer.	149
<b>Community Area</b>	The Community Area definition does not correspond with Map 1A, given that the definition seems to say that these areas include employment areas. Consider refining the definition to coincide with Map 1A.	150
<b>Community Hub</b>	Why is "or accessed through a digital service" in the definition - how would this be addressed via land use planning?	150
<b>Core Employment Areas</b>	Item (ii) of the definition for Core Employment states: "Adjacent to, or in proximity to,..." Shouldn't it be referring to where there is planned or existing employment uses that are not compatible with non-employment uses?	151
<b>Core Employment Areas</b>	Item (iii) "Not appropriate for more flexible employment uses" is rather vague. Not sure exactly what this is supposed to mean.	151
<b>Definitions</b>	Consider providing clarifying definitions for climate terminology used in the policies (e.g., mitigation, adaptation, and resiliency) - similar to how the Provincial Policy Statement defines its policy reference to "impacts of a changing climate". It will help set the tone and provide consistency for the local municipal official plans as they too incorporate climate change into their policies.	new
<b>Designated Greenfield Area</b>	There is an italicized term ("designated area") in the definition of Designated Greenfield Area that is not defined. The definition of DGA makes reference to the Provincial Built Boundary paper which is helpful, but the Region's definition must also account for new DGA that has come on stream since 2006 via ROPAs 1, 2, and 3, as well as through the proposed ROP.	151

Policy #	Comment	Page #
<b>Gentle Density</b>	<p>The definition for Gentle Density is very vague. For the Region's consideration, in the City's Key Directions Report, we define it as follows: "forms of development that can be accommodated through new lot creation within an existing community and/or when "missing middle" housing is introduced to an area where single and/or semi-detached housing is prevalent, in a manner that is contextually appropriate and desirable. Gentle density can also introduce non-residential development into a predominantly residential area through the provision of modest neighbourhood-serving commercial, cultural, institutional, and recreational uses. Further to that, "missing middle" is defined as: "modest multi-unit housing in forms such as duplex, triplex, walk-up apartments and live-work units."</p> <p>Also, the term "single family" is generally an antiquated planning term as it speaks to kinship vis-a-vis land use. Suggest it be replaced with "single-detached" dwelling.</p>	154
<b>Medium Density</b>	<p>Medium density is not defined, but is referenced in the definition of "missing middle". It might be more helpful if the Region simply stated in its policies what it is looking for along Regional Roads. For instance, in policy 4.4.16, it would be more clear to simply state that local municipalities identify locations along Regional arterial roads and other main streets where townhouse development can be accommodated.</p>	new
<b>Missing Middle</b>	<p>The term "missing middle" is not well defined. The definition uses the term "medium density" which is also not defined. What housing types (other than "medium density") would typically classify as "missing middle"? Where on the spectrum of housing options would this lie? How is it beneficial to have this definition?</p> <p>When looking at the definition of "low-density residential," which includes a range of housing types that include duplex, triples, and townhouses, one could surmise that "missing middle" or medium density includes a range of apartment style development starting from walk-ups, but it is not clear beyond that.</p>	159



<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Natural Heritage Evaluation &amp; other studies</b>	Natural Heritage Evaluation and all other studies referenced in the ROP should be defined.	new
<b>New Community Areas</b>	The definition of "New Community Area" is not consistent with ROP policies and mapping. "New Community Areas" have been added to the ROP since the adoption and approval of ROPAs 1, 2, and 3 in 2010.	160
<b>Secondary Plan</b>	For clarity, it would be helpful to define "secondary plan" as per the Planning Act:  17 (2.1.2) For the purpose of subsection (2.1.1), a secondary plan is a part of an official plan, added by way of an amendment, that contains policies and land use designations that apply to multiple contiguous parcels of land, but not an entire municipality, and that provides more detailed land use policy direction in respect of those parcels than was provided before the amendment. 2017, c. 23, Sched. 3, s. 8 (1).	162
<b>Strategic Growth Area</b>	The definition of "Strategic Growth Area" is much broader than what is listed in the policy for intensification hierarchy. Please reconcile the definition with the policy. The policy definition is more appropriate given the way the term is used in the policies of the ROP.	164
<b>Subwatershed</b>	This term would be more easily understood if the Region identified the watersheds and subwatershed on a map. Also, would it be appropriate to recognize the Conservation Authorities as the author of these plans?	164
<b>Supporting Employment Area</b>	In the definition of "Supporting Employment Area", why is "knowledge based uses" singled out in item (b)? Shouldn't it say "office uses"?	164
<b>Transit-Supportive</b>	The definition for "Transit-Supportive" states: Transit-supportive development will be consistent with Ontario's Transit Supportive Guidelines. This reads like a policy. What is intended by making that statement in the definition?	165

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Watershed Planning</b>	The definition of "watershed planning" seems very close to that of "subwatershed plan." It would seem that watershed planning is the act of preparing a watershed plan. Consider creating a definition for a watershed plan and ensure there is clarity in terms of what it is in relation to a subwatershed plan. It seems that the sub-watershed plan may take the high-level information from a watershed plan and provide much greater detail for a smaller area. But, as it is now, there is not a lot of clarity on this.	166

## Draft Maps

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Map 1A</b>	Only one of the areas designated as Office in the North Leslie Secondary Plan is shown as Employment, the lands adjacent to the 404 that are mid-block should also be identified as Employment on Map 1A.	170
<b>Map 1B</b>	As per comments regarding the use of the term "overlay" in Section 2.0, the Region should consider calling this something like the "Urban System Target Areas" or "Urban System Monitoring" and use this for monitoring purposes.	171
<b>Map 1B</b>	Policy 4.4.2.4 refers to protected MTSAs in Map 1B, but the map itself doesn't identify the MTSAs as "protected". To provide clarity, please indicate "Protected MTSAs" in addition to "MTSAs" on the legend of the map, as we understand that there are also MTSAs that are not protected.	171
<b>Map 1C</b>	<p>The Parkway Belt West Plan (PBWP) could be identified on this map as well. This is necessary since the ROP defers to the policies of the PBWP.</p> <p>Furthermore, it is noted that the Greenbelt Urban River Valleys are identified on this map, but there is no policy provided in relation to them. Perhaps the Region could consider indicating that when it comes to enhancement areas for the Greenlands System, public acquisition of these lands could be prioritized?</p>	172

<b>Policy #</b>	<b>Comment</b>	<b>Page #</b>
<b>Map 3</b>	Because the policies related to life science areas of natural and scientific interest (ANSI) are dependent on whether or not the ANSI is in the provincial Natural Heritage System (NHS), it would be helpful to also include the NHS overlay on this map.	174
<b>Map 9A</b>	The Recreational Trail Network should remove the proposed segment of the Lake to Lake Cycling Route and Walking Trail on the east Rouge tributary south of 19th Avenue, spanning from 19th Avenue to Leslie Street. The proposed segment on the west Rouge tributary should be maintained.	180
<b>Map 10</b>	Given recent provincial announcement and the updated Environmental Project Report Addendum for the Yonge North Subway Extension, there should be two subway stations shown for lands within Richmond Hill Centre (i.e. move the "station for further study" symbol).  Bathurst Street, from Highway 7 to Major Mackenzie - what is the status of this corridor, given that it was a Special Study Area in the current Regional Official Plan?	182
<b>Map 10</b>	It is recommended that the proposed GO Station at Bayview and 19th Avenue be removed and replaced by a proposed GO Station at Elgin Mills and Newkirk to better service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park. (See Recommendation in Staff Report SRPI.22.036.)	182
<b>Figure 1</b>	Figure 1 identifies the Landform Conservation Area with terms from the ORMCP technical papers - Complex Landform (ORM Category 1) and Moderately Complex Landform (ORM Category 2). However, these terms are not used within the ROP - not specifically within Section 3.4.3, nor defined in the definitions.	186
<b>Missing Map</b>	As noted in previous comments, mapping that shows watersheds and subwatershed either on their own or integrated with existing maps would help to implement policies of the ROP.	n/a
<b>Missing Map</b>	With intensification, greenfield development and employment area conversions, it is important to understand the extent of airport protection areas with respect to noise and flightpaths. It would be very beneficial to include current Noise Exposure Forecast / Noise Exposure Projection contours as well as the regulated area for building height in relation to the Pearson, Buttonville and future Pickering airports.	n/a