

**ROPA No. 21**  
**Analysis of Comments Received to Date and Responses**

Comment Received By	#	Summary of Comments	Region's Response/Action
City of Mississauga (Staff report comments dated April 14, 2009 and Memorandum from the Planning and Building Department dated July 27, 2009)	1	Mississauga staff provides comments that active recreational uses are not appropriate within Core Areas of the Greenlands system and that Section 2.3.2.5 (e) allowing compatible recreation in Core Areas should be deleted from the ROP. Staff notes that the Greenbelt Plan acknowledges that river valley connections are a "key component of the long-term health of the Natural System" and that municipalities should "maintain and, to the extent possible, enhance the ecological features and functions found within these valley systems".	<p>Regional staff supports clarification of Section 2.3.2.5 e) to: indicate what is meant by compatible recreation; limit where compatible recreation may be permitted within Core Areas of the Greenlands System; specify the conditions under which compatible recreation may be allowed; and to provide policy direction allowing area municipalities to be more restrictive than the Regional Official Plan if they wish.</p> <p>CVC, TRCA and the Ministry of Municipal Affairs and Housing also submitted comments on Section 2.3.2.5 (see also comments 156, 157, 160, 161, 168, 174, 246 and 251). For clarity and to ensure consistency with the PPS, Section 2.3.2.5 is revised as follows:</p> <p>2.3.2.5                  Prohibit <i>development</i> and <i>site alteration</i> within the Core Areas of the Greenlands System in Peel, except for:</p> <p>a) forest, fish and wildlife management;</p> <p>b) conservation and flood and erosion control projects, but only if they have been demonstrated to be necessary in the public interest and after all reasonable alternatives have been considered;</p> <p>c) <i>essential infrastructure</i> exempted or authorized under an environmental assessment process;</p> <p>d) passive recreation;</p> <p><del>e) compatible recreation within the Urban System, as shown on Schedule D;</del></p> <p><del>f) development permitted within approved Two Zone and/or</del></p>

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			<p><del>Special Policy Areas for flood plains;</del></p> <p>g) <i>minor development</i> and <i>minor site alteration</i>; and</p> <p>h) <i>existing uses, buildings or structures</i>, expansions to existing agricultural buildings and structures, <u>single residential dwellings and accessory uses, buildings and structures to both; new buildings and structures that are accessory to existing agricultural and residential uses;</u> and a new single residential dwellings on an <i>existing lot of record</i>, provided that the dwelling would have been permitted by the applicable planning legislation or zoning by-law on the date of approval of this Plan.</p> <p><del>These</del> The above exceptions may be permitted through an approved area municipal official plan or the Niagara Escarpment Plan where applicable, in consultation with the Region, the conservation authorities, the Niagara Escarpment Commission and other relevant agencies, provided that the policies which permit such uses and activities are in conformity with the objectives and policies of this Plan.</p> <p>The area municipalities <del>are strongly encouraged to consider adopting</del> <u>are directed to adopt appropriate policies that would allow the exceptions subject to it being demonstrated that:</u></p> <p>i) there is no alternative location outside of the Core Area and the use, <i>development</i> or <i>site alteration</i> is directed away from the Core Area feature to the greatest extent possible; and</p> <p>ii) the impact to the Core Area feature is minimized and any impact to the feature or its functions that cannot be avoided is mitigated through restoration or enhancement to the greatest extent possible.</p> <p><u>Notwithstanding the above exceptions, no new <i>development</i> or <i>site alteration</i> shall be permitted within the significant</u></p>

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			<p><u>habitat of endangered and threatened species, significant wetlands and significant coastal wetlands except as may be authorized in accordance with provincial legislation."</u></p> <p>Sections 2.3.2.5 e) and f) are deleted and replaced with the following new section 2.3.2.16:</p> <p><b>Valley and Stream Corridors</b></p> <p>2.3.2.16  <u>Permit the following within Core valley and stream corridors unless an area municipal official plan is more restrictive than the Regional Official Plan:</u></p> <p><u>i) compatible active recreation within the Urban System as shown on Schedule D;</u></p> <p><u>ii) development permitted within approved Two Zone and Special Policy Area flood plains; and</u></p> <p><u>iii) new agricultural, agricultural-related and secondary uses, buildings and structures,</u></p> <p><u>These exceptions may be permitted within Core valley and stream corridors except within significant wetlands and significant habitat of endangered and threatened species; and except within other significant natural features unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions."</u></p>
	2	The Environmental Advisory Committee of the City of Mississauga commented that the Region of Peel should consider increasing the resources for land securement for lands subject to the natural heritage policies.	This comment has been forwarded to the program planners responsible for the Region's Greenlands Securement Project.
	3	The Environmental Advisory Committee also suggests that	Section 7.6.2.10 includes policy direction to review the

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		the Region identify a target natural heritage system.	Region's natural heritage systems policy and to develop a Regional Greenlands Strategy. The policy direction includes the consideration of targets as suggested.
	4	Urban agriculture policies are absent from ROPA 21 and should be considered. Policies could promote sustainable and organic farming methods for this type of agriculture.	Section 3.2.2.10 advocates the promotion of agricultural opportunities within suitable near-urban and urban areas.
	5	What is the funding source related to the proposed policy in Section 3.2.2.15 to investigate financial incentives to farmers for the provision, protection and enhancement of ecological goods and services.	The policy directs staff to research financial incentives for ecological goods and services. The research will need to evaluate feasibility and the cost/benefits to the Region of a program including details on how a program might be implemented in Peel. At this time there are no funding sources identified.
	6	With respect to Section 3.2.2.16, what is intended by a land taxation system that provides financial incentives to farmers?	The intent of Section 3.2.2.16 is for staff and the area municipalities where appropriate, to investigate ways in which the existing land taxation system may be revised to provide financial incentives to farmers. Existing financial incentives such as the Conservation Land Tax Incentive Program (CLTIP), the Farmlands Taxation Programs, and the Tax Reduction Programs could be streamlined and strengthened to avoid confusion and overlaps between the different property tax programs, and to improve their effectiveness. Farmers could also benefit from 'enhanced' Tax Reduction Programs such as the Retail Sales Tax Exemption to purchase a variety of farming implements and related materials used exclusively for farm purposes; and the Farm Property Class Tax Rate Program, which could allow eligible properties to be taxed at a 'preferential' Farm Property Class tax rate.
	7	With respect to Section 3.2.2.17, what is the funding source for the financial incentives addressed in this policy?	Section 3.2.2.17 directs staff to investigate various incentives to enable farmers to remain financially viable. Provincial funding sources that provide financial incentives to farmers include the Conservation Land Tax Incentive Program (CLTIP), the Farmlands Taxation Program, the Tax

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			Reduction Programs, and the <i>Farm Improvement and Marketing Cooperatives Loans Act</i> (FIMCLA), designed to increase the availability of loans for improving and developing farms, and the processing, distribution or marketing of farm products by co-operative associations.
	8	With respect to Section 3.2.2.18 encouraging the development of agricultural technologies, it is recommended that the policy would be more appropriate in a corporate or strategic plan and not in the official plan.	Section 3.2.2.18 is intended as an 'encouragement' policy in terms of advancing the Official Plan objective to respond effectively to emerging planning issues, and is consistent with Goal 4.4 of the Region's Strategic Plan V to maintain a vibrant agriculture industry in Peel.
	9	Mississauga staff suggests including cross-references to the other air quality policies in Section 2.2.3.	The ROP format does not cross-reference policies unless where necessary for clarity and interpretation purposes. No revision is recommended or required.
	10	<p>Mississauga staff asks the following questions related to Section 2.2.3.3.1 which is giving direction to develop tools to assess the air quality implications of development.</p> <p>How would these tools be developed and implemented?</p> <p>Who would administer the air quality assessment and what expertise would be required to review it?</p> <p>Does this policy extend into an area that is under Provincial jurisdiction?</p>	<p>ROPA 21 lays the foundation for further work on air quality. Further research is needed to inform the development of tool(s) and reporting protocol. As part of this process, the Region will consult with the area municipalities, key stakeholders, Province and general public. A proposal based on further research will be brought back to Council.</p> <p>The air quality tool would be administered at the appropriate level given the type of development.</p> <p>The policy supports and compliments the Province's mandate for air quality.</p>
	11	<p>With respect to Section 2.2.3.3.6 and the policy to establish corporate air quality targets, Mississauga staff suggests that the policy might be more appropriate in an operational document or as a strategic initiative and not in the official plan. Staff also ask that the following be clarified:</p> <p>Do the corporate targets in this policy relate to targets in Region of Peel buildings, vehicles or operations?</p>	<p>The addition of Section 2.2.3.3.6 to the Regional Official Plan compliments the Region's Strategic Plan which states that the Region will implement strategies to improve air quality. Targets are intended to be outlined in operational documents such as the Multi Stakeholder Air Quality Management Plan.</p> <p>The corporate targets mentioned in the policy will relate to reductions in emissions from Region of Peel buildings,</p>

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			vehicles and operations.
	12	Section 2.2.3.3.7 is supported subject to it being modified to clarify the intent that the Region will be supporting area municipalities in the development of policies that are local planning matters.	Section 2.2.3.3.7 has been revised to read:  <del>“Support and work with the area municipalities to develop the development of area municipal official plan policies including, but not limited to, requiring setbacks for residential developments, transportation corridors and the separation of sensitive land uses and sensitive land uses to be located an adequate distance from both planned and existing sources of harmful emissions.”</del>
	13	Mississauga staff asks whether the Section 2.2.3.3.8 on monitoring and modeling air quality is extending into Provincial jurisdiction.	Section 2.2.3.3.8 supports and compliments areas of Provincial mandate.  The Ontario Ministry of the Environment monitors ambient air quality through a network of 38 Air Quality Index monitoring stations across Ontario, 11 of which are in the Greater Toronto Area. Two AQI stations are located in the Region of Peel. The Mississauga station is located at the University of Toronto Mississauga campus. The Brampton monitoring station is located at Peel Manor, 525 Main Street North.  The purpose of the Region's monitoring and modeling would be to supplement the provincial data by providing more detailed data than the province is able to provide. Additional air quality monitoring and modeling will allow the region to better assess the air quality in Peel Region, in order to make informed decisions regarding land use decisions and air quality implications.  ROPA 21 was circulated to the Province and no concerns were raised about this policy.
14	Section 6.4.2.3 should be changed to state that new development should be encouraged to comply with Peel Waste Collection Design Standards.	With the expected intensification in Peel over the next several years, Regional staff is requesting compliance with guidelines in the Waste Collection Design Standards Manual	

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		<p><b>Additional staff comments provided on July 27, 2009:</b></p> <p>This is an issue in Mississauga with all the infill development taking place.</p> <p>Given that the Region is supporting a higher intensification scenario in ROPA 24, this seems to run contrary to this policy.</p> <p>More and more smaller infill sites are proposed for development and some sites are faced with design layouts that require smaller vehicles to pick up waste.</p> <p>When is your manual set to be re-examined?                      Could this be reviewed as it would facilitate future infill development on small sites.</p>	<p>(WCDSM) so that standard base level waste management services support diversion (recycling). The Manual is a guideline only and is applied to land development applications on an individual basis through consultations with applicants.</p> <p>Currently, developers can request exemptions from the WCDSM and would not be required to have recycling services if private waste collection is used.</p> <p>Revisions were made to the WCDSM in June 2007 and the manual is subject to further revisions in 1-2 years.</p> <p>Section 6.4.2.3 has been revised as follows:</p> <p><u>“Require new development to comply with the Peel Waste Collection Design Standards Manual to ensure safe and efficient waste collection and diversion through consultation with the area municipalities and applicants.”</u></p>
	15	<p>Section 6.4.2.4 should be clarified. Staff is asking whether Mississauga's industrial designation, which permits waste processing facilities, transfer stations and composting facilities, satisfies the requirement that policies should not present unreasonable barriers to development of waste facilities.</p>	<p>Regional staff is satisfied that waste processing and transfer stations are permitted under the industrial designation in the City of Mississauga Official Plan. However there is no mention of energy from waste (efw) in Mississauga's Official Plan as policy 6.4.2.4 mentions efw.</p> <p>Section 6.4.2.4 has been revised as follows:                      “Require the area municipalities to develop, review, and amend official plan policies to permit waste facilities, including processing, <u>and</u> storage, <del>and energy from waste facilities, to</del> <u>in</u> appropriate locations so that the policies do not present unreasonable barriers to development of waste facilities.”</p> <p>New section 6.4.2.13 is added as follows and subsequent sections are renumbered:  <u>“Encourage the area municipalities to develop guidelines to permit energy from waste facilities in appropriate locations.</u></p>

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	16	Section 6.4.2.6 - Mississauga staff suggests that a policy on procurement as a method to promote source reduction would be more appropriate as part of a corporate plan or strategic initiative and not part of the official plan. Is it the intent of this policy that the area municipalities develop their own policies on procurement to the end specified in the policy?	<p>Places to Grow requires municipalities to promote a cultural of conservation including through the minimization of waste. A procurement policy at the Regional level is appropriate because it sets the basis for more detailed work and implementation and establishes municipalities as leaders in source reduction with a view to encouraging the private sector to follow.</p> <p>The intent of the policy is to work with and encourage the area municipalities to develop policies on procurement from a range of choices and initiatives (official plan, strategic plan, etc).</p>
	17	Section 6.4.2.8 directing area municipalities to require developers and contractors to incorporate materials from waste diversion programs is not a matter of official plan policy and would be onerous to establish and monitor. It is recommended that the policy be revised to an encouragement policy.	<p>Section 6.4.2.8 has been revised as follows:  <del>Direct</del> <u>Encourage</u> the area municipalities to require developers and contractors to incorporate materials from waste diversion programs into construction projects where practical.</p> <p>Places to Grow requires municipalities to develop and implement official plan policies to support conservation including policies for integrated waste management that promote the reuse and recycling of construction materials.</p>
	18	Mississauga staff request clarification on the Energy from Waste policies in relation to such issues as air emissions, odour, etc. in relation to potential energy from waste sites.	<p>In relation to air emissions, odour, etc, the energy from waste sites in Peel follow Provincial air emissions standards to ensure they meet or exceed required standards. Ash is disposed at secure hazardous waste landfill sites. Potential energy from waste sites are required to follow the same strict standards as existing sites.</p> <p>Emissions are continuously monitored and results are submitted to the Ministry of Environment on a monthly basis. An independent consultant conducts testing of existing facilities. Emission results are discussed at Public Liaison Committee meetings held by the Region of Peel about every</p>

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			two months.  Also, see response to comment number 15.
	19	Section 6.4.2.13 requiring area municipalities to use their land use planning approval authorities to require construction and demolition material to be diverted and reused would be onerous to establish and monitor and should be reworded to be an encouragement policy.	Section 6.4.2.13 has been revised as follows: <del>Direct</del> <u>Encourage</u> the area municipalities to use their authority <del>where available</del> to issue planning approvals as a means to require materials generated at construction commercial and demolition sites to be diverted and reused.
	20	Mississauga staff recommend that the procurement policies in Sections 6.4.2.14 and 6.4.2.15 not be included in the official plan and that they might be more appropriate as part of the Region's corporate plan or as a strategic initiative.	The policy is appropriate in an official plan as it addresses provincial policy interests in Section 2 g) of the <i>Planning Act</i> related to minimization of waste.  The policy on procurement aligns with the broad goals and objectives of the Region's Strategic Plan. No revision is recommended or required.
	21	What is the funding source for the economic and other incentives for multi-residential buildings in Section 6.4.2.16?  Mississauga staff also suggest that this is not a matter of official plan policy and that the policy might be more appropriate as part of the Region's corporate plan or as a strategic initiative.	The policy is appropriate in an official plan as it addresses provincial policy interests in Section 2 g) of the <i>Planning Act</i> related to minimization of waste.  The Integrated Waste Management Discussion Paper (pg. 46-47) describes economic incentives as additional fees for tenants and building owners for extra volumes of waste collected above a certain threshold.
City of Brampton (Staff report comments dated April 29, 2009)			
		<b>Comments Related to Natural Heritage</b>	
	22	Generally, ROPA 21 should have little effect on Brampton than the other two area municipalities in Peel since the recently approved 2006 Brampton Official Plan is already in conformity with the latest provincial natural heritage policies of the 2005 Provincial Policy Statement. As well, the City's new Official Plan also broadly conforms with the Growth	Comments are noted. No revisions are required.

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		<p>Plan. The new City Official Plan has already incorporated the latest mapping from ROPA 13 (which updated the mapping of the Core Greenlands System in the Cities of Brampton and Mississauga), Conservation Authorities and the Province. Areas of ROPA 21 that may affect Brampton and the City's response are discussed below.</p>	
	23	<p>Section 2.3.2.17 and Glossary - staff are generally supportive of the proposed revised woodlands definition to include cultural woodlands and savannahs (proposed Table 1 and Section 2.3.2.18). However, staff has indicated to the Region concern with plantations being included as woodlands and would recommend that only "naturalized" plantations be considered.</p> <p>Glossary definition for woodland - Include "<b>naturalized</b>" before 'plantations'.</p>	<p>For further clarity, the proposed revisions to the definition for woodlands will be revised and a new definition for plantations will be added to the Glossary as follows:</p> <p><b>Revised woodland definition:</b></p> <p>"...Woodlands include cultural woodlands, cultural savannahs and <u>naturalized</u> plantations <del>except if the plantation and</del> <u>exclude</u> plantations that are:..."</p> <p><b>New plantation definition:</b></p> <p>"Plantation: a treed community in which the majority of trees have been planted or the majority of the basal area is in trees that have been planted, often characterized by regularly spaced rows. With time and forest management, natural regeneration can become established and eventually convert the community to natural forest."</p>
	24	<p>City staff supports the recommended size criteria to identify Core woodlands as it recognizes the distinct rural and urban characteristics of the various municipalities in Peel and provides policies that are appropriate for this context.</p>	<p>Comments are noted. No revision required.</p>
	25	<p>The Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study concluded that mapping of significant wildlife habitat would not be feasible as most of the site specific information is either unavailable, because of the sensitivity of data or the need for detailed field studies. City staff suggests that the Region take a lead role in managing significant wildlife habitat data as it is generated through</p>	<p>Regional staff acknowledges a role for the Region, the area municipalities and the conservation authorities related to future research and mapping of significant wildlife habitat.</p>

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		agency studies and development applications. Such role is appropriate for the Region considering the broad, cross boundary nature of the wildlife habitat data.	
	26	Staff is concerned with the mapping changes proposed for the Bram West and North West Brampton planning areas. While these changes generally correspond to Schedule D of the City Official Plan, these features and associated policies have been appealed to the OMB. Staff expects resolution of some of these issues through the current secondary/block planning processes for these areas. But until such time, the proposed mapping changes in West Brampton are premature and should not be advanced as part of ROPA 21 including any related policy statements until the OMB has determined the final disposition of the appeals.	Regional staff does not support the comment that the proposed mapping changes and related policy respecting ROPA 21 is premature prior to completion of the studies and secondary plan for the Mount Pleasant Secondary Plan Area. The Regional policies will guide and inform future planning approvals in Mount Pleasant and other secondary plan areas in all three area municipalities so that policy direction is consistent on a Regional and area municipal-wide basis. Regional policy provides a framework for official plan policy at a local level. Updated policies in ROPA 21 are intended to achieve consistency with provincial policy and to provide policy that is applied on a Region-wide basis. The Region is required under the Planning Act to bring the ROP into conformity with provincial policy as part of the current five year review of the Plan.
	27	<p>Section 2.3.2.16 of ROPA 21 proposes revisions to cross-reference the permitted exceptions within valley and stream corridors that are identified as Natural Areas and Corridors (NAC).</p> <p>Staff do not consider it appropriate to require valley and stream corridors that are identified as Natural Areas and Corridors (NAC) to be subject to the same criteria as Core Greenland features. NAC features generally are of a lower level of significance than the Core features and should be permitted more flexibility in terms of land uses. Brampton's Official Plan provides for more permitted uses in valleylands and watercourse corridors (Section 4.5.7.2) such as agriculture, conservation, multi-use trails and related facilities, horticultural nurseries, forestry, wildlife refuge, public and private parks, stormwater management facilities and golf course. Development of these uses will be subject</p>	<p>For clarity, Section 2.3.2.16 has been deleted and Section 2.3.2.15 has been revised to clarify where and under what conditions alterations to valley and stream corridors may be considered.</p> <p>See response to comments #177 and #188 below.</p>

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		<p>to an approval process as well as the relevant watershed, subwatershed and environmental studies.</p> <p>The Region should provide a definition for "compatible recreation" in ROPA 21 and clarify if uses such as golf courses, parks, etc. that are currently permitted in the City's Official Plan, are included in this definition.</p>	<p>See response to comment #1 above.</p>
	28	<p>Section 2.3 of ROPA 21 proposes the following description for natural corridors:</p> <p><i>Natural corridors are naturally vegetated or potentially revegetated lands that connect, link or border critical ecological attributes and functions and also provide ecological functions such as habitat, migration routes, hydrological flow, connections or buffering from adjacent impacts. Certain woodlands, waterbodies, watercourses, valleylands, riparian zones, shorelines, and portions of the Niagara Escarpment natural heritage system, and intervening adjacent lands function as natural corridors in the Greenlands System.</i></p> <p>The policy should also recognize and reconcile "land corridors" as a type of linkages in the Regional natural heritage system. The City has also put forth a similar suggestion to CVC regarding its watershed policy document.</p> <p>Also in second line, delete "ecological attributes" and replace with "natural areas, features".</p>	<p>The proposed description of natural corridors in Section 2.3 is intended to recognize "terrestrial" or "land" corridors as a type of linkage for the purposes of the Region's Greenlands System. Section 2.3 is revised to add the reference to terrestrial corridors and to clarify the meaning of "ecological attributes" as suggested:</p> <p><b>"Natural Corridors</b></p> <p>Natural corridors are lands that are naturally vegetated or that have the potential to be revegetated that connect, link or border <del>critical ecological attributes</del> <u>natural features and areas and functions</u> and also provide ecological functions such as habitat, migration routes, hydrological flow, connections or buffering from adjacent impacts. Certain woodlands, waterbodies, watercourses, valleylands, riparian zones, shorelines, and portions of the Niagara Escarpment natural heritage system, and intervening adjacent lands function as natural corridors in the Greenlands System. <u>Natural corridors on lands that are not vegetated, but have the potential to be revegetated to improve the integrity and function of the Greenlands System, are identified through the preparation of natural heritage studies in accordance with area municipal official plan policy.</u>"</p>
	29	<p>Staff is supportive of the new policies for invasive species management (Section 2.5.3 of ROPA 21) and Greenlands management and stewardship (Section 2.6 of ROPA 21).</p>	<p>The comment is noted. No revision required.</p>

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	30	<p>Staff agrees with the proposed work, generally referred to as Stage 2 PROPR Natural Heritage Review, in principle to enable the Region to move towards a full natural heritage systems approach. In establishing the work plan for this Stage 2 work, the Region should follow the principles proposed in Section 7.6.2.10 of ROPA 21 and consult and seek agreement with area municipalities, conservation authorities and relevant stakeholders before proceeding.</p> <p>Staff has also identified that some existing policies in the Regional Official Plan should be revised to be consistent with the current provincial, agency and municipal wording such as sustainable development, natural heritage system planning, etc. These suggested revisions have been provided to the Region as part of the City's comment on the November 28, 2008 draft version of ROPA 21. Regional staff has indicated that these requested changes will be addressed in Stage 2 of the PROPR Natural Heritage Review as they are considered not directly related to or required by the current conformity exercise. Staff agrees with this approach.</p>	The comment is noted. No revision required.
	31	Section 1.3.3 - add the wording " <b>Policy 7.2.2.3 and</b> " before "Policy 7.2.2.7" in the second sentence "Except as expressly noted in Policy 7.2.2.7, any changes, additions, or deletions to these elements will require an amendment to this Plan".	Section 1.3.3 has been revised to add the suggested addition.
	32	Section 2.3 - for the various elements of the Greenlands System in this section, refer to the source of this description.	Various sources including the existing Regional Official Plan and Natural Heritage Reference Manual were used to develop descriptions of the elements of the Greenlands System. It is not the current practice to include sources for policy in the ROP. No revision is recommended or required.
	33	Section 2.3 - description of Habitats of Threatened and Endangered Species Delete "special conservation" before "concern" in the first line.	<p>Section 2.3 has been revised to delete "special conservation" before "concern" in the first line to read as follows:</p> <p>"Habitats of threatened and endangered species, and other species of <del>special conservation</del> concern..."</p>

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	34	Section 2.3 - the last paragraph, delete the word "maintenance" and replace by " <b>management</b> ".	The existing wording in Section 2.3 is considered to be appropriate. No revision is recommended or required.
	35	Section 2.3.2.1 b) - replace the word "interpreted " with " <b>identified</b> ".	The use of the word "interpreted" is broader than the term "identified" and includes both evaluation and identification. No revision is recommended or required.
	36	Section 2.3.2.1 c) - replace the word "interpreted" with " <b>identified</b> ".	See comment #35 above.
	37	Section 2.3.2.1 c) - Delete the second sentence "Potential Natural Areas and Corridors will be analyzed to determine their functional role in supporting and enhancing the integrity of the Greenlands System in Peel" as the functional role of a potential NAC and protection required would have been determined through the identification process. The statement seems to refer to a completely separate process.	For policy clarity and interpretation, the suggested revision is not recommended or required.
	38	Section 2.3.2.1 - last paragraph after 2.3.2.1 c), include also the proposed new wording to be added to Section 7.2.2.3 (Clause 66 of ROPA 21) to this section and as a note on Schedule A for clarity.	To avoid policy duplication within the Regional Official Plan, the suggested revision is not recommended or required.
	39	Section 2.3.2.2 f) - delete the word "significant" as it is no longer necessary with the latest Endangered Species Act.	The reference to "significant habitats of threatened and endangered species" is consistent with the PPS. No revision is recommended or required.
	40	Section 2.3.2.5 a) - clarify or re-phrase the second part of this sub section "the use, <i>development or site alteration</i> is directed away from the Core Area feature". If the development/site alteration is directed away from the Core Area feature, it is no longer within the Core Area and as such, this policy does not apply. Instead, the matter should be addressed by the "adjacent land" policy.	The policy direction in Section 2.3.2.5 a) requires the use, development or site alteration to be directed away from the Core Area feature "to the greatest extent possible". The policy implies the ability for limited minor exceptions to encroach into Core Areas where there is no reasonable alternative and subject to mitigation through restoration and enhancement. No revision is recommended or required.
	41	Section 2.3.2.7 - the requirement of "in accordance with	The reference to "normal farm practices" is consistent with

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		normal farm practice" is a new requirement which seem to have exceeded that of Section 2.1.7 of the PPS which states that "nothing in Section 2.1 is intended to limit the ability of the existing agricultural uses to continue."	the intent of the PPS and does not affect the ability of legal conforming or legal non-conforming uses to continue. No revision is recommended or required.
	42	Section 2.3.2.8 h) - "Headwater source and discharge areas" are not identified as a component of the Regional Greenlands System in Section 2.3. Should add this to the list and provide explanation/description in Section 2.3 for consistency and clarity.	Section 2.3 is a brief summary of the major elements of the Greenlands System and does not detail or describe every Core Area, NAC or PNAC feature listed in the policies in section 2.3.2. No revision is recommended or required.
	43	Section 2.3.2.9 - the meaning of the reference to policy 2.3.2.8 (i) is not clear.	Section 2.3.2.9 includes a cross-reference to former policy 2.3.2.11 g) which has been renumbered to 2.3.2.8 i) by ROPA 21.
	44	Section 2.3.2.9 b) - this is not consistent with Table 1. For clarity, this should go after 2.3.2.9 c).	Section 2.3.2.9 b) lists cultural woodlands and cultural savannahs as PNACs which is consistent with the criteria for these woodland types in Table 1. No revision is recommended or required.
	45	Section 2.3.2.9 c) - add reference to Table 1. For clarity, this should go before 2.3.2.9 b).	Section 2.3.2.9 b) has been revised to read:  <u>"cultural woodlands and cultural savannahs within the Urban System and Rural Service Centres meeting one or more of the criteria in Table 1. The evaluation of cultural woodlands and cultural savannahs is also subject to policy 2.3.2.18."</u>
	46	Section 2.3.2.9 f) - is there mapping or definitions for this, i.e., portion of Historic Shorelines?	Historic shorelines of Lake Iroquois occur in the City of Mississauga. Mapping of the surficial geology is available.
	47	Section 2.3.2.9 h) - delete this as it is the City's understanding that the conservation authorities no longer refer to potential ESAs.	Environmentally Sensitive or Significant Areas (ESA) policy, and the need to consider future potential ESAs, will be reviewed in the future Phase 2 review of the Region's natural heritage systems planning approach.
	48	Section 2.3.2.15 - delete the wording "jointly with the Region" and include additional wording after 'field' work" that indicates	Section 2.3.2.15 has been revised to delete the words "jointly with the Region". See also response to comments #177 and

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		<p><b>"in accordance with Table 2, Criteria and Thresholds for the Identification of Core Valley and Stream Corridors "</b> as the Region is not involved in development applications and/or the review of supporting studies.</p>	<p>#198 below.</p>
	49	<p>Section 2.3.2.22 - add the wording <b>"for environmental impact studies"</b> after "this requirement" in the second paragraph.</p> <p>In Paragraph 2, delete the wording "has been <i>jointly</i> undertaken or <i>supported</i> by" and replace it with <b>"in consultation with"</b> before "the relevant agencies" as this policy indicates that requests for an environmental impact study are the responsibility of the area municipalities.</p>	<p>Section 2.3.2.22 has been revised as follows:</p> <p><i>"This requirement for environmental impact studies may be reduced if detailed development criteria have been applied to a site through a subwatershed study <del>comprehensive joint planning process</del>, a comprehensive environmental impact study, <del>on the basis of a subwatershed plan</del>, or if an appropriate scoping exercise has been <del>jointly undertaken or supported by</del> <u>completed by the area municipality in consultation with the relevant agencies.</u>"</i></p>
	50	<p>Section 2.5.2.9 - delete the wording "the agencies and" after 'area municipalities' and replace by <b>"in consultation with relevant agencies"</b> as the urban forest is generally located on public (City owned lands) and/or on private lands.</p>	<p>The policy indicates a willingness of the Region to support or work in partnership with the conservation authorities and area municipalities to develop urban forest strategies. No revision is recommended or required.</p>
	51	<p>Section 2.5.3.2.2 - revise the statement to "area municipalities <del>and</del> <b>in consultation with</b> conservation authorities" to reflect the role of the conservation authorities as a consulting agency.</p>	<p>Section 2.5.3.2.2 has been revised as follows:</p> <p><i>"Support and encourage the area municipalities <del>and</del> <u>in consultation with the</u> conservation authorities to develop policies..."</i></p>
	52	<p>Section 2.6.2.1 - include also conservation easement.</p>	<p>The Region's Greenlands Securement Project defines land acquisition to include conservation easements. The Glossary has been revised to include a new definition for land acquisition consistent with the existing definition adopted for the Greenlands Securement Project as follows:</p> <p><i><b>"Land acquisition</b> – the transfer of interest in title of land through a variety of means such as fee simple purchase, conservation easements and land donations."</i></p>

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	53	Section 2.6.2.4 - replace the words "other sources" by " <b>various sources</b> ".	Section 2.6.2.4 has been revised as suggested.
	54	Section 2.6.2.7 - include the additional wording of " <b>Support the area municipalities and conservation authorities to encourage</b> " at the beginning of this policy as the Region is not directly involved in the approval of development applications.	Section 2.6.2.7 has been revised to add the suggested wording as follows:  " <u>Support the area municipalities and conservation authorities to encourage landowners and applicants for <i>development</i> and <i>site alteration</i> to support the Region's Greenlands <i>securement</i> efforts by enhancing lands adjacent to the Greenlands System in Peel.</u> "
	55	Section 7.2.2.3 - as the boundaries of Core Areas will be refined through development applications and/or area municipal planning studies, the wording " <b>by the area municipalities</b> " should be added after "as may be required" and before "through the planning approval process, in consultation with relevant agencies".	Section 7.2.2.3 has been revised as suggested.
	56	Section 7.6.2.10 - add " <b>in consultation with area municipalities, conservation authorities, neighbouring municipalities, and other government agencies</b> " after "a workplan".	This reference is already included in Section 7.6.2.10. No revision is recommended or required.
	57	Section 7.9.2.8 e) - Replace "Table 1" by " <b>Table 3</b> ".	Renumbered Section 7.9.2.8 f) has been revised by replacing "Table 1" with "Table 3". Item 58 in ROPA 21 amends the ROP by replacing all existing references to "Table 1" with "Table 3".
	58	Glossary - there are inconsistencies and repetition amongst the definitions for significant, significant feature and significant wildlife habitat.	The definition for "significant wildlife habitat" has been deleted from the Glossary. The term "significant wildlife habitat" will continue to provide a cross-reference to the definition for "significant" which is consistent with the PPS definition of significant wildlife habitat.  With the revision to the SWH definition, the definitions and use of the term "significant" are consistent within ROPA 21.

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			The definition for "significant feature" is consistent with the recommended wording in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> for the purposes of applying proximity criteria for woodlands. No further revisions are recommended or required.
	59	Glossary definition for watercourse - should this not also include " <b>and Core Valley and Stream Corridors</b> " before "a body of water".	The definition for "watercourse" is consistent with the definition recommended in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> . No revision is recommended or required.
	60	<p>Schedule A - various minor mapping refinements to the Core Areas shown on Schedule have been identified by City of Brampton staff and agreed to by the Region.</p> <p>Areas shown as "Area of Special Policies (Refer to Figure 2)" outside of Greenbelt and Parkway Belt West within Brampton appear to be watercourses, as shown on Figure 2 which is not identified in the legend of Figure 2 as an area of Provincial interest. As such, these designations in Brampton should be removed from Schedule A.</p>	<p>The minor mapping refinements to the Core Areas shown on Schedule A have been incorporated into ROPA 21.</p> <p>Areas of special policies shown on Figure 2 identify where policies contained in provincial plans apply within Peel (e.g. River Valley Connections (outside the Greenbelt)). An updated Figure 2 will be added to the Regional Plan as a housekeeping amendment.</p>
		<b>Comments Related to Air Quality</b>	
	61	Staff considers the direction of the proposed air quality policies in ROPA 21 generally satisfactory. The proposed modeling and monitoring of air quality in the Region (Section 2.2.3.3.8), and the development of a multi-stakeholder air quality management plan (Section 2.2.3.3.2) are particularly supported as these will facilitate the formulation of more detailed strategies and policies for improving air quality at the Regional level and beyond. This work will also provide useful input for the City's Growth Plan conformity exercise that includes a proposal to strengthen the air quality policies of the Official Plan. Staff also suggests that ROPA 21 gives recognition to the benefits of developing a monitoring program that coordinates/combines with the other federal or	Please see detailed comments and responses below.

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		provincial monitoring programs.	
	62	<p>Section 2.2.3.2.1 - as provided, this policy is confusing. It is not clear whether this policy is speaking to an 'assessment tool' and/or a 'management tool'. In this regard 'The development of tools to assess air quality implications of development' appears to suggest that an 'assessment tool' is being used; however, 'that minimize adverse health effects' is confusing. Does it mean that the assessment tool will only be used to assess those developments that are perceived to be minimizing impacts? Or will the assessment tool provide information that can be used by development to minimize impacts? Or is this referring to an implementation tool that will minimize air quality concerns? If this is strictly referring to the use of an assessment tool, then a second policy is necessary to address how this knowledge will be used to define a management tool for development that will minimize adverse health effects.</p>	<p>Policy 2.2.3.2.1 refers to the development of an assessment tool. ROPA 21 lays the foundation for further work on air quality. Further research is needed to inform the development of tool(s), which may include a management tool as part of the implementation. As part of this process, the Region will consult with the area municipalities, key stakeholders, Province and general public. A proposal based on further research will be brought back to Council.</p>
	63	<p>Section 2.2.3.3.7 - this policy should promote proactive planning by first requiring the avoidance of locating residential and sensitive uses near sources of harmful emissions. Only if that is inevitable, then mitigation measures should be required including but not limited to setback from the emission sources.</p> <p>This policy also seems to suggest that the area municipalities do not have setbacks in policy and/or the zoning bylaw that are intended to address setbacks from harmful emissions. Also, shouldn't any City setbacks first reflect legislation/regulations, or best management practices?</p>	<p>The goal of this policy is to enhance the work that is already being done by the area municipalities and to further incorporate health-based evidence into the planning process. No revision is recommended or required.</p> <p>See also response to comment # 12.</p>
	64	<p>Section 2.2.3.3.8 - the Region should also recognize the possibility/need to develop a monitoring program and/or coordinate-combine their program with other federal or provincial monitoring.</p>	<p>Further research is needed to inform the monitoring and modeling. In order to coordinate and combine the Region's monitoring and modeling with federal and provincial efforts, there are technical and data quality assurance requirements that would have to be met. These requirements would be</p>

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			considered as part of the further research required.
		<b>Comments Related to Agriculture</b>	
	65	Given Brampton's context within the Urban System, staff find the proposed ROPA 21 agricultural policies generally reflective of and consistent with that of the City's Official Plan. Staff is also supportive of the policies to assist the agricultural industry in Peel Region. However, some of the proposed policies/initiatives are considered to have less relevance to Brampton and clarity is requested to that effect. As well, staff also suggests some revisions to ensure that the proposed policies are compatible with the planned urbanization in Brampton as discussed below.	Please see detailed comments and responses below.
	66	Section 3.2, first paragraph, third sentence - delete the phrase "outside the urban area". The reference to Prime Agricultural Area in Brampton should be revised to clarify that all land in the City is now within the urban area with the approval of ROPA 15 and to be consistent with that shown in Schedule B (Prime Agricultural Area) of the Peel Regional Official Plan. Furthermore, include additional wording following this statement to clarify that these areas (i.e. rated as CLI Class 1 in Brampton has been designated for urban development.	Section 3.2, first paragraph, third sentence has been revised as follows:  "...Currently the majority of lands in the southern part of the Town of Caledon and on the east and west side of the City of Brampton <del>outside the urban area</del> have soils which are rated as CLI Class 1.
	67	Section 3.2 - suggest re-wording to " <i>The agricultural industry is diversifying <del>away from primary production and now to include</del> <b>in addition to primary production</b>, a value added chain, as well as health and nutrition, sustainability, environmental management and conservation themes. Support for farming operations in Peel <del>helps ensure</del> <b>will contribute to building</b> a stronger agricultural industry, <b>bringing</b> benefits <del>for to those communities who</del> that depend on the industry <b>as well as the larger society.</b>"</i>	The recommended new paragraph to be added to Section 3.2 has been revised as suggested:  "The agricultural industry is diversifying <del>away from to include</del> , <u>in addition to</u> primary production, a <i>value added chain</i> , as well as health and nutrition, sustainability, environmental management and conservation themes." Support for farming operations in Peel <del>helps ensure</del> <u>will contribute to building</u> a stronger agricultural industry, <u>bringing</u> benefits <del>for to those communities who</del> that depend on the industry <u>as well as the larger society.</u> "

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	68	<p>Section 3.2.1.4 of ROPA 21 proposes:</p> <p><i>To work in cooperation with the area municipalities and the farming community to maintain reliable food sources, and to ensure overall sustainability and liveability in Peel.</i></p> <p>Maintaining reliable food sources is a greater responsibility that is beyond that of local municipalities. As such, this policy is inappropriate and should be revised to perhaps speak to promoting farming as a source of local food supply.</p>	<p>Policy 3.2.1.4 has been revised to read:</p> <p>To work in cooperation with the <u>Town of Caledon to increase and support appropriate diversification in local farming as a source of local food supply.</u> <del>area municipalities and the farming community to maintain reliable local food sources, and to ensure overall sustainability and liveability in Peel.</del><sup>1</sup></p>
	69	<p>Staff suggest minor re-wording of Section 3.2.2.4 for clarity and consistency with the City's Official Plan including that respecting the Greenbelt as follows:</p> <p><i>"Encourage, <b>where appropriate</b>, the phasing of development <b>in accordance with the area municipal official plan</b> so that agricultural <b>activities and related uses continue for as long as practical in the area</b> <del>production on agricultural lands that lies within the 2031 Regional Urban Boundary but outside the Greenbelt,</del> <b>continues for as long as practical in the City of Brampton, and within the approved boundaries of the Rural Service Centres in the Town of Caledon</b>".</i></p>	<p>Policy 3.2.2.4 has been revised to read:</p> <p>"Encourage, <u>where appropriate</u>, the phasing of development <u>in accordance with the area municipal official plans</u> so that agricultural <u>activities and related uses continue for as long as practical in the area</u> <del>production on agricultural lands that lies within the 2031 Regional Urban Boundary but outside the Greenbelt,</del> <u>continues for as long as practical in the City of Brampton, and within the approved boundaries of the Rural Service Centres in the Town of Caledon.</u>"</p>
	70	<p>Section 3.2.2.10 of ROPA 21 proposes:</p> <p><i>Promote agricultural opportunities including niche markets and community gardens within suitable near-urban and urban areas to supply local markets, support health and protect the environment.</i></p> <p>As well as at suitable areas, these uses have to be of a suitable scale and nature that are appropriate and compatible with the adjacent urban land uses. Definition or additional wording should be included in the policy to address land use compatibility.</p>	<p>Policy 3.2.2.10 has been revised to read:</p> <p>"Promote agricultural opportunities <u>including such as</u> niche markets and community gardens <u>of suitable scale that are compatible with the adjacent urban land uses,</u> within <u>suitable</u> near-urban and urban areas to supply local markets, support health and protect the environment."</p> <p>See also response to comment # 121.</p>

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	71	With respect to Section 3.2.2.14, clarification is sought as to what "on-farm diversity" means or includes. If the intention is to promote diversity of use, zoning by-law provisions have to be reviewed.	Policy 3.2.2.14 has been revised to read:  "Encourage <del>on-farm</del> <u>greater</u> diversity for economic purposes of permitted uses, such as secondary uses and agriculture-related uses within prime agricultural areas, and value-added industries like agricultural research institutes, feed mills and fertilizer depots to aid the farm industry, and to maintain <del>an</del> <u>integral component</u> of the cultural heritage and way of life of the farming community."
	72	Sections 3.2.2.15 to 3.2.2.17 - the City has policies in the Official Plan to support the farming industry by considering land use planning and related measures such as permitting "farm occupation", related commercial uses within agricultural uses, and accommodation for seasonal farm help. The City also supports other incentives that are non land use planning related such as tax and financial incentives, but recognizes that these are broader issues that require the participation of senior levels of government, as stated in 4.15.2.1 of the Brampton Official Plan. Given these City policies and the phasing out of agriculture in Brampton eventually, staff expects the City's involvement in these proposed initiatives will be limited.	The comment is noted.
	73	Section 7.9.2.8 c) - add the word " <b>existing</b> " before "agricultural operations".	Section 7.9.2.8 c) would require an analysis of the impacts from new or expanding settlement areas on existing and future agricultural operations. The analysis and mitigation of impacts on agriculture would be required when amending a settlement area boundary such as a proposed amendment to the Regional Urban Boundary or to a Rural Service Centre boundary. This policy will not apply in the City of Brampton.
		<b>Comments Related to Integrated Waste Management</b>	
	74	Staff's comments on ROPA 21 focus on clarifying definitions and terminologies, consistency with the City's Official Plan policies and implementation matters such as those related to procurement, economic and other incentives for waste	Responses to detailed comments are provided below.

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		diversion etc.	
	75	The City requests that ROPA 21 state clearly that no new landfill sites are permitted in Brampton, given the municipality is expected to be fully urbanized by about 2031.	<p>The Region of Peel has no desire to open new landfill sites. Private landfill sites would still require an amendment to the Regional Official Plan.</p> <p>Section 6.4.2.18 has been revised as follows:                      Recognize the Caledon landfill sites, as shown on Figure 10 of the Appendix, as the only active landfill sites in <i>Peel Region</i>. <del>The establishment and operation of a new landfill site at another location is discouraged and will require a Regional Official Plan Amendment.</del></p> <p>Section 6.4.2.19 has been deleted:  <del>Review any proposal to establish and operate a new landfill site in <i>Peel</i> for consistency with the objectives and policies in this Plan and the <i>area municipal official plans</i>.</del></p>
	76	The proposed policies seem to focus on multi-family residential diversion as well as industrial construction and demolition wastes. In considering City staff's review of ROPA 21, the Brampton Environmental Planning Advisory Committee (BEPAC) recommended that the Region also consider options for managing commercial waste. As discussed in Section 6.4 of the PROPR Integrated Waste Management Discussion Paper, various options are used by other municipalities with varying levels of intervention, reporting and enforcement such as mandatory recycling plans, "pay as you throw", waste hauler reporting requirements, and diversion at special events. ROPA 21 should include a policy to provide further consideration of measures to address the issue of commercial waste disposal at private landfills and stronger policies/initiatives that encourage waste diversion and recycling at non-residential land use within the Region.	<p>It is not recommended that the Region manage Industrial, Commercial, and Institutional (ICI) waste because the Region would be in direct competition with private waste haulers.</p> <p>The Region may consider other measures to encourage ICI waste diversion and the following policy will be added to the official plan as new Section 6.4.2.17:</p> <p>"Explore and consider options to address industrial, commercial and institutional waste diversion such as mandatory recycling plans, pay-as-you-throw, and waste hauler reporting programs."</p>
	77	Section 6.4.1.3 - clarify on the definition of "municipal solid	The definition of municipal hazardous waste and municipal

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		waste", "municipal hazardous waste" and "special waste".	special waste can be found in the <i>Waste Diversion Act, 2002</i> , Ontario Regulation 542/06. These terms are included in the Glossary of the official plan.  Municipal solid waste is waste that is collected and managed by the Region of Peel.
	78	Section 6.4.2.3 - modify policy to allow some flexibility in cases where the Waste Collection Design Standards Manual conflicts with the site plan design, especially with the good elements of site plan design or with planned Alternative Design Standards for a community.	See response to comment # 14.
	79	Section 6.4.2.4 - clarify within this policy the type of waste processing facility referred to (solid waste, liquid waste, non-hazardous waste, hazardous waste etc). The waste coming from some industrial facilities and some institutional facilities may be considered hazardous waste. Construction and demolition waste processing facilities may require large amount of outdoor storage and the City of Brampton does not permit outside storage associated with a waste processing use.	The examples provided by City of Brampton staff are correct. The term <i>waste</i> is defined in the glossary of the official plan for ROPA 21 and waste processing facilities would be facilities in the context of the <i>waste</i> definition.  We understand some waste processing facilities may not be compatible with the surrounding community. The purpose of the policy is for municipalities to develop and review official plan policies to permit waste facilities in appropriate locations. City of Brampton undertook this work in 2007.
	80	Section 6.4.2.6 - procurement methods should be more appropriately dealt with as a Strategic Plan initiative, as opposed to the Official Plan which is primarily a land use planning document.	See response to comment # 16.
	81	Section 6.4.2.7 - the policy is appropriate as long as it is not a mandatory requirement.	The comment is noted.
	82	Section 6.4.2.8 - replace the word "require" by "encourage" to provide flexibility and reflect the intention of such provision "where practical".	See response to comment # 17.
	83	Section 6.4.2.10 - the City has no issue with ensuring that	The comment is noted.

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		maximum value is extracted from waste prior to disposal, as long as any new practices do not conflict with the City of Brampton Official Plan policies that have already put in place through OP93-288.	
	84	Section 6.4.2.12 - the City has no issue with ensuring that maximum value is extracted from waste prior to disposal, as long as any new provincial policies do not conflict with the City of Brampton Official Plan policies that have already put in place through OP93-288.	The comment is noted.
	85	Section 6.4.2.13 - clarify when the requirement would be implemented and whether this would be a condition of site plan or implemented as a condition of draft approval.	See response to comment # 19.
	86	Section 6.4.2.14 - the Region needs to come up with the most feasible way to monitor the diversion and reuse of construction materials and for the participants to prove that the diversion and reuse requirements are met in order to receive the economic incentives.	The comment is noted.
	87	Section 6.4.2.15 - implementation of the policy is envisaged to be somewhat difficult both for the municipality to monitor and the participants to prove that the diversion and reuse requirements are met in order to receive the economic incentives.	A third party to audit diversion and reuse requirements can monitor and prove requirements are met. The Region has experience in monitoring diversion of waste collected and can provide technical knowledge on the process.
	88	Section 6.4.2.16 - clarify what level of government the Region or the municipality is expected to provide these economic incentives.	See response to comment # 21.
	89	Section 6.4.2.17 - the policy should ensure that all partners are treated equally and the Region does not end up with the burden of providing the service.	The comment is noted.
	90	Section 6.4.2.18 - must state clearly that no additional landfill sites are permitted in Brampton, given that the City will be urbanized by about 2031.	See response to comment # 75.

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	91	Section 6.4.2.19 - must state clearly that no additional landfill sites are permitted in Brampton, given that the City will be urbanized by about 2031.	See response to comment # 75.
Town of Caledon (Staff report comments for integrated waste management and air quality dated May 26, 2009 and for natural heritage and agriculture dated October 20, 2009)		<b>Comments Related to Natural Heritage</b>	
	92	<p>Town staff generally supports the directions of the Region regarding Natural Heritage. In broad terms, the natural heritage policies of ROPA 21 are largely responsive to the Caledon staff input, for example, the proposed woodlands and wildlife habitat policies are based on a scientifically sound background document, the Peel-Caledon Significant Woodland and Significant Wildlife Habitat Study. Also, progressive new policies are proposed with respect to greenlands securement, private land stewardship, and financial incentives relating to ecological goods and services.</p> <p>Aspects of the draft policies that require further refinement and clarification are outlined below.</p>	Responses to detailed comments are provided below.
	93	Further refinement is required with respect to the "minor development" and "minor site alteration" exemptions within Regional Core Greenlands to ensure that an appropriate range of uses are permitted within Regional Core Greenlands and that criteria and requirements proposed to apply to such uses are reasonable and in balance with the potential for impacts.	<p>Revisions to Section 2.3.2.5 are proposed to ensure an appropriate range of uses are permitted within Regional Core Greenlands and that criteria that apply to the permitted uses are reasonable.</p> <p>See response to comment #1.</p>
	94	Clarification is needed with respect to the policies that apply to agricultural uses within Regional Core Greenlands: specifically, the policies need to explicitly recognize that new agricultural buildings are permitted where existing agricultural operations occur within Core Greenlands.	<p>In principle, Regional staff support appropriate flexibility for existing agricultural operations affected by natural heritage policy and have included proposed exemptions (permitted uses) within Core Greenlands to allow new agricultural accessory buildings and structures. See response to comment #1 for the proposed policies.</p> <p>The proposed policies include criteria through which such</p>

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			<p>new buildings and structures may be considered and allowed in order that impacts are avoided or minimized. Further policy in ROPA 21 will direct the area municipalities to implement the policy through more detailed policies in the area municipal official plans. Regional staff prefer that detailed implementation of the policies be developed at the area municipal rather than the Regional Plan level as policies may be tailored and different in each of the area municipalities. Finally, the Regional Plan will provide direction to area municipalities to require EIS studies and which enable scoping of EIS study requirements so that approvals for "minor site alteration" or "minor development" are not onerous to landowners when anticipated impacts are negligible.</p>
	95	<p>There are a number of areas where the proposed policies inappropriately indicate that the area municipalities have a primary delivery role, such as with respect to invasive species management and the delivery of natural heritage stewardship programs. The policies need to be revised to ensure that they correctly characterize the role of the area municipalities.</p>	<p>Section 2.5.3.2.1 is revised as follows:</p> <p>"Acknowledge and support the role of the area municipalities, conservation authorities, provincial agencies and conservation organizations <del>as the primary agencies responsible for coordinating the delivery of</del> <u>in carrying out</u> invasive species management."</p> <p>Section 2.6.2.2 is revised as follows:</p> <p>"Acknowledge and support the role of the area municipalities, conservation authorities, provincial agencies and conservation organizations <del>as the primary agencies responsible for coordinating the delivery of</del> <u>in carrying out</u> <i>stewardship</i> programs for natural heritage."</p>
	96	<p>It is recommended the Regional policies use words such as "encourage" rather than the word "require" in policies that provides direction to area municipalities. This is intended to provide direction, encourage and support area municipalities in their efforts to incorporate and implement policies that will promote natural heritage in the local plans.</p>	<p>The use of the words "encourage", "require" and "direct" within Section 2.3 has been reviewed. The policy guidance with respect to the type of direction given to area municipalities was established when the plan was originally adopted in 1996 and is not being revised in ROPA 21. The policy direction is considered necessary for consistency with</p>

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			the PPS.
	97	Town staff will be seeking several refinements to the Region's proposed Schedule A – Core Areas of the Greenlands System in Peel to ensure recognition of the refinements to Caledon's Environmental Policy Areas made through the settlement of Caledon's Official Plan Amendments (OPA) 124 / 161, Ministerial approval of OPA 186 and Council's adoption of OPA 206 (as part of the EPA refinement exercise completed through the environmental Zoning By-law).	Regional staff has worked with Town staff to refine mapping in ROPA 21. Regional staff compared the proposed Core Areas mapping on Schedule A with the most recent adopted refinements to the Town of Caledon Environmental Policy Area mapping refined through OPAs 124, 161 and 206 to identify areas that were recently removed by the Town but that were being identified by the Region to be added through ROPA 21. Each of the discrepancies were reviewed and removed where appropriate to align the proposed Regional mapping to the Town of Caledon mapping. Core Areas that were being added by the Region because of proposed new Core woodlands criteria or because of more recent mapping data from agencies for other Core Area features (e.g. PSW wetland mapping) were not adjusted unless inaccuracies were identified in the source data.
	98	Section 2.3.2.7 should be amended by adding the phrase "in existence on the day this plan is approved" after "existing agricultural uses".	ROPA 21 includes a new definition for an existing use, building or structure. The word "existing" in Section 2.3.2.7 has been italicized to refer to the proposed definition.
	99	Revise Section 2.3.2.8 a) by adding "and replaced with evaluated non-Provincially Significant".	Section 2.3.2.8 a) has been revised to read as follows:  " <u>Class 4 to 7 evaluated non-provincially significant wetlands</u> "
	100	Revise Section 7.2.2.3 by adding the phrase "area municipalities and" after "consultation with" and adding the phrase "or field level or scale investigations".	Section 7.2.2.3 establishes that boundary refinement and more detailed mapping of the Core Areas will be completed through planning approvals at the site level. It is intended that this policy will be implemented by the area municipalities through the local planning approval process. For clarity, Section 7.2.2.3 has been revised to read as follows:  <del>"The exact lines and boundaries for the information contained in the generalized schedules will be defined in the area municipal official plans, where applicable.</del> The boundaries of the Core Areas of the Greenlands System shown on

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			Schedule A are intended to be general in nature. More detailed mapping of the Core Areas of the Greenlands System <u>will be provided in the area municipal official plans</u> , and will be <u>further</u> determined on a site specific basis through studies, as may be required <u>by the area municipalities</u> through the <u>local</u> planning approval process, in consultation with <u>the Region and</u> relevant agencies. Due to the general nature of the Core Areas boundaries on Schedule A, an amendment to the Plan is not required for minor boundary adjustments to the Core Areas of the Greenlands System as determined through required studies <u>or field investigations.</u> "
	101	For Section 2.5.2.9, the Region should consider the need for an additional policy related to a Rural Roadside Tree Program along Regional roads to replace aging roadside trees and for natural windbreaks."	The Region has not identified a Rural Roadside Tree Program as a policy priority at this time. The Regional Official Plan includes an existing policy in Section 7.7.2.8 to allow landscaping within lands to be conveyed or purchased by the Region for Regional road widening purposes. The Region is also completing Regional Road Streetscaping Guidelines which also addresses landscaping and tree planting within Regional road allowances. No revision is recommended or required at this time.
	102	Delete the last sentence in the preamble to Section 2.5.3 and change the phrase "the promotion of" to "to promote" in Section 2.5.3.1.	Sections 2.5.3 and 2.5.3.1 have been revised as suggested.
	103	Would it be helpful throughout section 2.6 to add the word "research" before "planning policy" or is this implied as part of "planning policy"?	Research is implied when the reference to planning policy is used.
	104	Clarify the difference between social, heritage and cultural in Section 3.1.2.	Section 3.1.2 has been revised to clarify the reference to heritage and culture to read as follows:  "To protect, manage and utilize the renewable and non-renewable resources of <i>Peel</i> in an efficient manner that conserves and <i>protects</i> environmental features and functions, and the character of rural <i>Peel</i> including its social,

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			<del>heritage</del> , cultural <u>heritage</u> , <i>community</i> and economic aspects.”
	105	Revise Section 7.6.2.10 a) by adding “and management” after the word “organization”.	Section 7.6.2.10 a) has been revised as suggested.
	106	Revise Section 7.6.2.10 b) by changing “modelling through a model or modelling exercise” to “a modelling exercise”.	Section 7.6.2.10 b) has been revised to read as follows:  “the need to identify a Regional natural heritage system based on modeling <del>through a model or modeling exercise</del> which considers the Region’s future ecological requirements and targets.”
	107	Revise Section 7.6.2.10 d) by adding “and area municipal official plans” after “Greenbelt Plan”.	Section 7.6.2.10 d) has been revised as suggested.
	108	Revise the Glossary definition for woodlands by changing the phrase “less than” in the second clause b) to “20 years or less” and by moving the phrase “without a woodland restoration objective” in the second clause c) to follow after the word “rotation”.	The proposed wording in ROPA 21 is consistent with wording in the technical guidelines for significant woodlands for the Oak Ridges Moraine Conservation Plan and Greenbelt Plan. No revision is required or recommended.
	109	Revise the Glossary definition for cultural woodlands by changing “succession” to “successional”.	The Glossary definition is consistent with wording provided in the Ecological Land Classification for Southern Ontario (Lee et. al 1998) and the description in the Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study. No revision is required or recommended.
	110	Revise the Glossary definition for “stewardship” by changing “long-term ecological sustainability” to “long-term health and protection”. The term “sustainability” should also recognize “cultural heritage and social well-being”.	No revision is required or recommended.
	111	Revise the Glossary definition for “tributary” to “a tributary is a stream or river which flows into a mainstream (or parent) river”.	The Glossary definition for “tributary” has been revised to read:  “a river or stream that flows into a larger river or stream <del>or</del>

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			other body of water.”
	112	Revise the Glossary definition for watercourse by changing “definite” to “defined”.	The Glossary definition for “watercourse” has been revised as suggested.
		<b>Comments related to agriculture.</b>	
	113	In general, the proposed agricultural policies contained in draft ROPA 21 reflect a significant effort on the part of the Region to acknowledge the key issues and challenges faced by agriculture in Peel and in the broader national and international context, and provide appropriate Regional policy responses to these key issues. The Region has been making ongoing efforts to consult with the agricultural sector and has shown an openness to continue to fine-tune the policies to meet the needs of agriculture in Peel.	Responses to detailed comments are provided below.
	114	It is recommended the Regional policies use words such as “encourage” rather than the word “require” in policies that provides direction to area municipalities. This is intended to provide direction, encourage and support area municipalities in their efforts to incorporate and implement policies that will promote natural heritage in the local plans.	Revisions to ROPA 21 have been incorporated into the amendment where appropriate. See detailed comments below.
	115	The preamble to the policies could go further than simply addressing provincial conformity: it should speak to a Regional philosophy of supporting a thriving and viable agricultural industry in Peel, and embracing innovation and new practices (e.g. producing bio-mass for fuel).	The Preamble to the agricultural section has been revised to include the following new sentence :  “The Region supports the continuation of a thriving and viable agricultural industry in Peel including diversification, agricultural innovation and new practices in all aspects of the industry.”
	116	The policies should provide greater recognition of the challenges faced by near urban agriculture and the need to research these challenges, and identify appropriate policy and other responses to reflect the distinct and evolving nature of near-urban agriculture in Peel, for example reviewing the restrictions on minimum lot size.	Regional staff recognizes the challenges faced by near urban agriculture, which include; complaints from non-farm residents about farm practices, problems regarding moving farm equipment on congested roads and the adequacy of infrastructure, such as water and drainage, shortage of rental land or lack of affordable land to purchase, and trespassing.

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			<p>Section 3.2.2.10 proposes to add a policy that promotes near urban and urban agricultural operations that are compatible with adjacent urban uses.</p> <p>Section 3.2 is revised to add the following new policy direction:</p> <p>“3.2.2.18                      Investigate with the area municipalities, the challenges and emerging needs of near urban agriculture including: complaints from non-farm residents about farm practices; problems regarding movement of farm equipment on congested roads; the adequacy of infrastructure, such as water and sewage disposal; farm parcel sizes; the shortage of rental land or lack of affordable land to purchase; and trespassing.”</p>
	117	The policies should acknowledge and encourage agriculturally related uses that are necessary for the long term viability of an agricultural industry in Peel, such as value added industries like agricultural research institutes, feed mills and fertilizer depots.	See response to Comment # 71.
	118	There should be a policy relating to the proposed Strategic Infrastructure Study Area that speaks to minimizing impacts on agricultural operations (e.g. new infrastructure splitting farms).	The purpose of the Strategic Infrastructure Study Area (SISA) policy is to prevent incompatible development from predetermining or precluding the potential outcomes of the GTA West Corridor Environmental Assessment. The SISA policies are being included in ROPA 24, the managing growth component of PROPR, to ensure the Region's long term strategic planning and infrastructure needs are addressed. The identification and evaluation of environmental impacts associated with the GTA West Corridor will be undertaken by the MTO or other proponents undertaking infrastructure planning within the study area in accordance with the Ontario Environmental Assessment Act. Regional staff is aware that impacts to agriculture are being considered in the GTA West Corridor Environmental Assessment Study by the MTO.

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			Policies that reflect this requirement will be included in RPA 24.
	119	<p>There is a need for additional policy to ensure an evaluation of agricultural capability and priority of the Prime Agricultural Area and other lands is undertaken to ensure the protection of agricultural lands for long-term needs. For example, it would be appropriate for the Region, in partnership with the Town, to undertake a Land Evaluation Area Review (also known as LEAR) or other alternate land evaluation methodology. This would be done to confirm or refine the current prime agricultural area boundary to reflect the definition of the Prime Agricultural Area in the 2005 Provincial Policy Statement. This land evaluation will be undertaken after the PROPR exercise.</p> <p>The Region should consider including a policy to monitor the effects of the Provincial Minimum Distance Separation (MDS) formulation on the viability of agricultural operations in order to build up an information base for future provincial reviews of the MDS formula.</p>	<p>Regional staff support adding a policy to undertake a Land Evaluation Area Review (LEAR) in partnership with the Town of Caledon and to include a policy to monitor the application of the MDS formulae in Peel.</p> <p>The following new policy Section 7.6.2.17 has been added in Chapter 7, under the Resources Section after renumbered Section 7.6.2.16:</p> <p><u>“Undertake jointly with the Town of Caledon, a Land Evaluation Area Review (LEAR) to ensure the protection of the Prime Agricultural Area for long-term use for agriculture and to undertake research with the Town to review and assess the application of the MDS formulae in Peel.”</u></p>
	120	Caledon staff suggests changing section 3.2 to “The agricultural industry is diversifying to include primary production, <i>value added chains</i> , as well as...”	See response to comment # 67 above.
	121	Revise Section 3.2.2.10 by changing “including” to “such as” and by adding the phrase “, where appropriate” after “community gardens”.	See response to comment # 70.
	122	Revise Section 3.2.2.11 by changing “2021” to “2031”.	<p>Section 3.2.2.11 has been revised to read:</p> <p>“...This policy may not be used to address a proposal that has the effect of adjusting the <del>2024</del> <u>2031</u> Rural Service Centre boundary...”</p>
	123	Revise Section 3.2.2.14 by adding the phrase “of appropriate	Policy 3.2.2.14 has been revised. See response to comment

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		permitted uses" after the word "diversity" and clarify what "on farm diversity" means or entails. If the intention is to promote diversity of use, zoning by-law provisions have to be reviewed.	# 71.
	124	Revise Section 3.2.2.18 by adding the phrase "area municipalities to consider" after "Encourage" and adding "where appropriate" after the word "necessary".	Section 3.2.2.18 has been revised to read:  "Encourage <u>area municipalities to consider</u> the development of viable advanced technologies as necessary <u>where appropriate</u> , to promote year-round..."
		<b>Comments Related to Air Quality</b>	
	125	The Town generally supports the proposed ROPA 21 policies on Air Quality. By incorporating these in the Regional Official Plan Peel has demonstrated strong leadership in creating healthier and sustainable communities.	Responses to detailed comments are provided below.
	126	It is recommended the Regional policies use words such as "encourage" rather than the word "require" in policies that provides direction to area municipalities. This is intended to provide direction, encourage and support area municipalities in their efforts to incorporate and implement policies that will promote air quality in the local plans.	The word "require" is not used in the air quality policies under Section 2.2.3.3.
	127	Revise Section 2.2.3.2.2 by adding "transportation system" to the land use pattern. Based on the Discussion Paper, emission related to transportation is a significant contributor to poor air quality.	Section 2.2.3.2.2 has been revised to read:  "To promote sustainable development and land use patterns which address public health, <u>transportation systems</u> , energy conservation and environmental concerns."
	128	Delete the second sentence of Section 2.2.3.3.1 as size of development should not be a factor in applying the tool that would be developed to assess air quality. The tool should be applied regardless of the size of the development.	The tool will consider the type of proposal and potential impacts to air quality regardless of the size of the development.
	129	Revise Section 2.2.3.3.7 by deleting "requiring" before the word setbacks and add "transportation corridor" after the sensitive land use. This is to recognize the effects of	See response to comment #12 above.

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		transportation on air quality as demonstrated in the background work for this Focus Area.	
	130	Regarding Section 2.2.3.3.8, please specify reporting protocol with respect to monitoring and reporting of results from modeled air quality.	ROPA 21 lays the foundation for further work on air quality. Further research is needed to inform the development of tool(s) and reporting protocol. As part of this process, the Region will consult with the area municipalities, key stakeholders, Province and general public. A proposal based on further research will be brought back to Council.
		<b>Comments Related to Integrated Waste Management</b>	
	131	ROPA 21 has enhanced the existing policies in the Regional Official Plan to promote the 3 R's (Reduce, Reuse, and Recycle). The proposed policy also proposes stronger policies to promote waste diversion from source, energy from waste and partnership with both public and private sectors in Peel.	Responses to detailed comments are provided below.
	132	It is recommended the Regional policies use words such as "encourage" rather than the word "require" in policies that provides direction to area municipalities. This is intended to provide direction, encourage and support area municipalities in their efforts to incorporate and implement policies that will promote integrated waste management in the local plans.	Policy 6.4.2.2 is included in ROPA 21 for this purpose.
	133	In recognition of the partnership with area municipalities the Region should direct area municipalities to incorporate policies in their local official Plan that will encourage the adoption of the principles of waste reduction, reuse and recycling.	See response to comment # 125.
	134	In Section 6.4 add the following to the sentence: <i>The Region will continue to focus on reduction, reuse, and recycling programs (3Rs), examine waste management alternatives, explore the resource potential of waste, strive for cost effective waste management systems, and consider waste as a valuable source of alternative energy.</i> This is to reference policies 6.4.2.9 to 6.4.2.12.	Section 6.4, first paragraph, third sentence is revised as follows:  " <i>The Region will continue to focus on reduction, reuse, and recycling programs (3Rs), examine <u>and implement</u> waste management alternatives <u>that recover resources from the residual waste stream</u>, explore the resource potential of</i>

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			<del>waste, and</del> strive for a cost effective waste management system, <u>and recognize waste as a valuable source of alternative energy.</u>
	135	Revise Section 6.4.2.4 by changing "require" to "encourage" in the first sentence and deleting the remainder of the sentence after "in appropriate locations."	Policy 6.4.2.4 is an existing policy that contains the word "require" and is being revised in ROPA 21 so that the policies do not present unreasonable barriers to the development of waste facilities.  Also see response to comment #15.
	136	In Section 6.4.2.6, the region should encourage area municipalities to adopt procurement policies that will promote source reduction.	See response to comment # 16.
	137	Section 6.4.2.8 should use the word encourage rather than direct. While this is a good idea, it is unsure how area municipalities can adopt this type of policy.	See response to comment # 17.
	138	We are not sure area municipalities have the authority to issue planning approvals to require material generated at construction and demolition sites to be diverted and reused. Section 6.4.2.13 should be revised so that Peel in cooperation with area municipalities can work out incentives to enable developers to divert and reuse waste from construction and demolition sites.	See response to comment # 19.
Region of York (Written submission from Heather Konefat, Director of Community Planning dated March 16, 2009)	139	York Region Planning staff has no issues with the amendment and compliments Peel staff on their initiative, particularly the goal, objective and policies related to Air Quality.	None
County of Simcoe (Written submission from Kathy Suggitt, Manager of Policy)	140	Simcoe County staff provided general comments on the proposed Greenlands Systems policies noting they were very comprehensive and provided strong policy direction for the protection and enhancement of natural features. Staff also	None

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Planning)		notes that the inclusion of cultural woodlands and cultural savannahs in the amendment is of interest as the County of Simcoe has been considering a similar approach for woodlands within settlement areas.	
	141	The wording in Section 3.2.1.1, which establishes the objective of protecting the Prime Agricultural Area, should be reviewed in light of wording in the PPS that states "Prime Agricultural Areas should be protected for long term use for agriculture".	Section 3.2.1.1 has been revised as suggested.  "To protect the <i>Prime Agricultural Area</i> <u>for long-term use for agriculture</u> , and as a natural..."
	142	There is no mention in Chapter 6 (Waste Management) of the need to undertake D-4 assessments around landfill sites according to Provincial D-4 Assessment Guidelines.	There are no operating landfill sites in Peel Region and the Waste Management division has a monitoring program in place for closed landfill sites as required by the Province. No revision is recommended or required.
Corporation of the Town of New Tecumseth (Written submission from Eric Chandler, Manager of Planning dated April 2, 2009)	143	The Town advises it has no comments.	None
Ministry of the Environment (Written submission from John Gerretsen, Minister of the Environment dated April 9, 2009)	144	The Minister acknowledges receipt of ROPA 21 and notes that the ministry considers regional governments to be key partners in the work to protect and enhance Ontario's environment.	None
Ministry of Natural Resources (Written submission from Donna Cansfield, Minister of Natural Resources dated May 20, 2009)	145	The Minister acknowledges receipt of ROPA 21 and notes that the ministry's comments will be provided through the Aurora District Office and the provincial one-window municipal plan review process coordinated by MMAH.	None

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Ministry of Agriculture, Food and Rural Affairs (Written submission from Leona Dombrowsky, Minister of MAFRA dated May 27, 2009)	146	The Minister acknowledges receipt of ROPA 21 and notes that the ministry is pleased that the Region is committed to protecting the agricultural industry by preventing the loss of the agricultural land base.	None
Niagara Escarpment Commission (Written submission from Anne Marie Laurence, Ecological Monitoring Specialist dated April 9, 2009)	147	Capitalize "Escarpment" when used in relation to the Niagara Escarpment.	The suggested revisions have been incorporated into ROPA 21 where applicable and will be addressed through the Region's housekeeping amendment.
	148	<p>NEC staff recommends minor amendments to policies in Chapter 2, Section 2.3, 10<sup>th</sup> paragraph related to ANSIs, Escarpment Natural Areas and Escarpment Protection Areas.</p> <p>The suggested revisions include:</p> <ol style="list-style-type: none"> <li>1) revising Section 2.3 to distinguish between provincially and regionally significant ANSIs;</li> <li>2) minor revisions to the description of Escarpment Natural Areas;</li> <li>3) the addition of a new description for Escarpment Protection Areas; and</li> <li>4) changing the term "vulnerable" to "special concern" in the last sentence under the description for "Habitat of Threatened and Endangered Species".</li> </ol>	<p>Section 2.3 already refers to both provincially and regionally significant ANSIs. It is not recommended that Section 2.3 define the two levels of significance as the evaluation of provincially and regionally significant ANSIs is determined by the Province in accordance with provincial guidelines and policy. For consistency with Section 2.3, the definition for ANSIs in the Glossary has been amended to refer to both provincially and regionally significant ANSIs.</p> <p>The suggested revisions and additions related to Escarpment Natural Areas, Escarpment Protection Areas and vulnerable species have been included in the draft amendment as suggested:</p> <p>- the description for Escarpment Natural Areas in Section 2.3, Elements of the Greenlands System, is revised as follows:</p> <p>"Escarpment Natural Areas include Escarpment slopes and related landforms in a relatively natural state; <u>the most significant stream valleys and wetlands associated within the Escarpment</u>; <u>provincially significant</u> life science ANSIs <del>considered to be significant in accordance with the Niagara Escarpment Plan</del>; and forested lands <del>within</del> 300 metres back from <del>of</del> the Escarpment brow. These areas are designated in the Niagara Escarpment Plan as Escarpment Natural Areas</p>

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			<p>because they contain the most significant natural and scenic areas of the Escarpment.”</p> <p>- Section 2.3, Elements of the Greenlands System, is revised by adding the following sub-heading and description for Escarpment Protection Areas after the description for Escarpment Natural Areas:</p> <p><u>“Escarpment Protection Areas</u></p> <p><u>Escarpment Protection Areas are important because of their visual prominence and their environmental significance. Included in this designation are Escarpment features that have been significantly modified by land use activities such as agriculture or residential development, land needed to buffer prominent Escarpment Natural Areas, and natural areas of regional significance.”</u></p> <p>- the description for Habitats of Threatened and Endangered Species in Section 2.3, Elements of the Greenlands System, is revised by deleting the terms “vulnerable species and species of conservation concern” in the last sentence and replacing them with the term “special concern species”.</p>
	149	<p>NEC staff asks whether the habitat of nationally endangered and threatened species should be included and referenced separately in the ROP.</p>	<p>ROPA 21 includes policy in renumbered Section 2.3.2.8 to identify significant wildlife habitat, including the habitat of nationally endangered or threatened species, as Natural Areas and Corridors of the Greenlands System to be protected through the area municipal official plans. The criterion is also included in Figure 5 in ROPA 21 to identify the habitat of nationally endangered or threatened species as significant wildlife habitat.</p>
	150	<p>The following are comments provided by NEC on Table 1 Criteria and Thresholds for the Identification of Core, NAC and PNAC Woodlands</p>	<p>Table 1 has been revised as follows:</p> <p>- Table 1, first row, last column, item (i) is revised to:</p>

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		<ul style="list-style-type: none"> <li>- first row, last column should be "G3"</li> <li>- are there definitions in the ROP for the ELC acronyms used in the table (e.g. FOM 2-1 etc)?</li> <li>- first row, under the "age" criterion, is this the average age of the woodlot, or are there a minimum number of trees that have to be 90 years old?</li> <li>- consider including the term "significant woodland" in Table 1</li> <li>- should the criteria that was considered but not recommended (e.g. FQI, slope, etc.) be included in Table 1 (similar to Figure 5 for significant wildlife habitat).</li> </ul>	<p>"i. any G1, G2, <del>G3</del>, S1, S2, S3 plant or animal species, or community as designated by NHIC;"</p> <ul style="list-style-type: none"> <li>- Table 1, item (i), last column, first and second rows is revised by adding a footnote to explain the acronyms and to reference their source;</li> <li>- further clarification of the age criterion will be provided through terms of reference for environmental impact studies;</li> <li>- for clarification, it is not recommended that the term "significant woodland" be added to Table 1;</li> <li>- Table 1 is to be incorporated as policy into the ROP whereas Figure 5 is provided for information and reference purposes only. For policy clarity, it is not recommended that Table 1 be amended to add criteria that have been excluded by the study.</li> </ul>
Credit Valley Conservation (Written submission from Josh Campbell, Senior Planner dated April 9, 2009)	151	In regards to ROPA 21, although CVC staff identifies concerns regarding the proposed policies related to significant woodlands, significant wildlife habitat and certain terms in the Glossary, staff note that the amendments will provide further clarity and consistency to the Region's renewed approach to natural heritage protection.	Regional staff responses to detailed comments are provided below.
	152	<p>Section 2.2.1.2 - CVC staff suggest including the term 'restore' in this general objective to better recognize the Region of Peel and partner's efforts to restore the integrity of Peel's air, land and water resources through the planning process where practical. Additionally, it is unclear as to the difference between the terms 'conserve' and 'maintain'.</p> <p>CVC staff suggest the following revisions to provide further clarity:</p> <p>"To preserve, restore and enhance the integrity of Peel's air,</p>	The policy direction to "restore", rehabilitate and enhance the natural environment is already provided elsewhere in the Regional Official Plan (e.g. see Sections 2.1.1, 2.2.6, 2.2.7 and 2.3). Section 2.2.1.2 will be revised by replacing the word "maintain" with "restore". The revision reflects the intent of the Plan.

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		water and land resources.” Alternatively, the term ‘preserve’ above may be replaced with the term ‘maintain’ to be more consistent with language typically used in Provincial documents related to natural heritage protection (e.g. PPS, ORM, Greenbelt Plan, etc.)	
	153	<p>Policy 2.2.2 - CVC staff suggest considering the following revised general policy to further recognize the general objectives in 2.2.2.1:</p> <p>“Study, recognize and protect the overall integrity of Peel’s ecosystems which are part of connected biotic (living) and abiotic (non-living) systems providing local and larger non-localized natural functions.”</p>	<p>Policy 2.2.2.1 has been revised to read:</p> <p>“<u>Study, recognize and protect</u> the overall <i>integrity</i> of Peel’s ecosystems which are part of <del>larger</del> <u>connected</u> biotic (living) and abiotic (non-living) systems <u>providing local and larger scale natural functions.</u>”</p>
	154	<p>Section 2.3.2.2 – It is unclear if the stated ‘Core Woodlands’ and ‘Core valley and stream corridors’ are considered ‘<i>Significant Woodlands</i>’ and ‘<i>Significant Valleylands</i>’ by the Plan. For clarification, it might be helpful to revise these policies to read:</p> <p>2.3.2.2 c) ‘Woodlands meeting one or more of the criteria in Table 1 are considered to be <i>significant</i> woodlands;’</p> <p>2.3.2.2 h) ‘<i>Valley and stream corridors</i> meeting one or more of the criteria in Table 2 are considered to be <i>significant</i> valleylands. The limit of <i>significant</i> valleylands shall be determined jointly.... <i>Significant</i> valleylands include the main branches, <i>major tributaries</i> and other <i>tributaries</i>...’</p>	<p>It is not recommended that Core woodlands and Core valleylands be identified as significant as it may be interpreted that NAC and PNAC woodlands and valleylands are not also potentially significant in accordance with the Provincial Policy Statement. However, for clarity, it is recommended that an explanation be added to the preamble in Section 2.3 to describe the relationship of Core, NAC and PNAC features to significance under the PPS. Section 2.3 has been revised to add the following:</p> <p>“<u>The Regional Official Plan implements the Provincial Policy Statement’s (PPS) natural features policies through the Greenlands System Core Areas, Natural Areas and Corridors (NAC) and Potential Natural Areas and Corridors (PNAC) policy framework. Core Areas represent provincially and regionally significant features and areas and are considered a sub-set of what would be <i>significant</i> under the PPS. NAC and PNAC natural features and areas may also be evaluated and identified to be <i>significant</i> in <i>area municipal official plans</i> and through the local study process required during planning approvals in accordance with Regional, area municipal and provincial policy. Core, NAC and PNAC features and areas</u></p>

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			<p><u>may also be identified and subject to policy in provincial plans. Where such features and areas coincide with features and areas identified in a provincial plan, the policies in the provincial plan shall also apply. Where the province has provided criteria for the identification of natural features, the provincial criteria shall apply, unless municipal criteria achieve or exceed the same objective in which case the municipal criteria will apply.</u></p>
	155	<p>Further to the above, Section 2.3.2.2 a) refers to 'provincially significant wetlands' and b), e) and f) refer only to 'significant' features. In this respect, there appears to be 2 definitions for provincially significant wetlands (one under the term 'provincially significant wetlands' and the other under the term 'significant' a) CVC staff suggest either integrating these two definitions for clarity or removing the definition for the term 'provincially significant wetland' from the glossary.</p>	<p>Section 2.3.2.2 a) has been revised to delete the word 'provincially'. This policy will continue to list 'significant wetlands' as a Core Area of the Greenlands System. In accordance with the proposed Glossary definition for 'significance', the ROP will clarify that significant wetlands are areas identified as provincially significant by the Province. The existing definition for 'provincially significant wetland' in the Glossary is no longer needed and has been deleted.</p>
	156	<p>Section 2.3.2.5 provides exemptions for certain types of development and site alteration to occur within Core Areas of the Greenlands System in Peel (including significant habitat of endangered species and threatened species, significant wetlands and significant coastal wetlands). However, Section 2.1.3 of the PPS does not permit development and site alteration within Significant habitat of endangered species and threatened species, Significant wetlands and Significant coastal wetlands. In this regard, CVC staff question the consistency of this policy with the PPS (Section 2.1.3), as the proposed policy appears to allow for the noted activities to occur within the above referenced Significant features requiring unconditional protection under the PPS.</p>	<p>Revisions to Section 2.3.2.5 have been incorporated into ROPA 21 to clarify the policy. See response to comment #1.</p> <p>Section 2.3.2.21 Adjacent Lands has been expanded to clarify EIS requirements within Greenlands System features:</p> <p><b><u>“Environmental Impact Studies - Adjacent Lands</u></b></p> <p><b>2.3.2.21</b>          Direct the area municipalities to require environmental impact studies for <i>development and site alteration</i> <del>proposed on lands adjacent to</del> <u>within and on adjacent lands to the Greenlands System</u> and to include policies in their official plans that <i>development and site alteration</i> shall not be permitted <del>on lands adjacent to the Greenlands System</del> unless the ecological functions of the <u>features and adjacent lands</u> have been evaluated and it has been demonstrated that there will be no negative impacts on the natural feature or its functions <u>or the requirements of Section 2.3.2.5 have</u></p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
			<p><u>been satisfied.</u></p> <p>This requirement for environmental impact studies may be reduced..."</p>
	157	<p>CVC staff suggests revising Section 2.3.2.5 to include provisions to clarify that it must be demonstrated that there will be no negative impacts on the listed significant features. Alternatively, CVC staff strongly encourages the Region to include a provision requiring it to be demonstrated that there will be no negative impacts on the Greenlands System and Core area features, including their ecological functions.</p>	<p>Revisions to Section 2.3.2.5 have been incorporated into ROPA 21 to clarify the policy. See response to comment #1.</p>
	158	<p>CVC staff recommend that forest, fish and wildlife management activities permitted within Core Areas follow accepted best management practices (BMPs) and recommend Section 2.3.2.5 a) be revised to:</p> <p>"forest, fish and wildlife management activities following accepted best management practices"</p>	<p>Regional staff does not support the revisions to Section 2.3.2.5 a) as suggested. The exemption for forest, fish and wildlife habitat is consistent with the wording in the PPS.</p>
	159	<p>Section 2.3.2.5 d) – should this term be italicized? If not, a clear definition for passive recreation should be provided to ensure the intent of this policy is met as it relates to 'passive' recreation.</p>	<p>Section 2.3.2.5 d) has been revised to italicize "recreation". The term will be interpreted by reference to the existing definition for recreation in the ROP. The Glossary definition for recreation defines passive recreation.</p>
	160	<p>Section 2.3.2.5 e) – it is unclear as to what 'compatible' recreation within the Urban System is referring to (i.e. what is 'compatible' recreation). CVC staff suggests that it would be helpful if a definition of 'compatible' be provided. Please note that CVC staff is not in support of an exemption for 'active' recreation within Core Areas of Peel's Greenland System – in particular, Significant features, regardless of their 'compatibility' within the Urban System. The intent of this policy should be further clarified.</p>	<p>See response to comment #1.</p>
	161	<p>As you are aware, historically the Region has interpreted</p>	<p>See response to comment # 1.</p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
		<p>'minor development' to include, and in some instances preclude, the provisions provided in Section 2.3.2.5 h), as set out in further detail in the area municipal official plans. That approach was advantageous as it allowed further consideration for local context and circumstances as interpreted through local area municipal plans.</p> <p>In addition, although CVC staff agree with the intent of the policy, CVC staff question its consistency with PPS for similar reasons identified in comments #4 a) and b) above. In this regard, CVC staff suggest deleting this policy and clarifying Section 2.3.2.5 g), in particular, the definitions for 'minor development' and 'minor site alteration' as they relate to existing uses, expansions to existing uses and new residential dwellings on existing lots of record.</p>	
	162	<p>Finally, Section 2.3.2.5 encourages municipalities to consider adopting similar exemptions subject to demonstrating there are no reasonable alternatives and impacts to the Core Area features are minimized (this seems to be more restrictive than the policy which does not require the same). Is this a stand alone policy or an extension of 2.3.2.5? If a stand alone policy it should be numbered (i.e. 2.3.2.6). If an extension of 2.3.2.5, then the provisions should be renumbered (perhaps i and ii) as Sections 2.3.2.5 a) and b) already exist (i.e. as proposed, the plan now has two 2.3.2.5 a) and 2.3.2.5 b).</p>	<p>Section 2.3.2.5 has been renumbered as suggested.</p>
	163	<p>CVC staff continues to recommend that all woodlands within Peel meeting any one of the six criteria noted in Table 1 be considered Core. Such an approach would seem most consistent with Provincial guidelines which do not rank or place an emphasis on any one of the criteria/thresholds to determine woodland significance.</p>	<p>The criteria and thresholds to identify significant woodlands recommended in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> need to be considered in accordance with both the PPS and ROP's Greenlands System policies. Natural heritage features are categorized in the ROP as Core Areas, Natural Areas and Corridors (NAC) and Potential Natural Areas and Corridors (PNAC).</p> <p>Core Areas are functionally supported, connected and/or buffered by the Natural Areas and Corridors and Potential</p>

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			<p>Natural Areas and Corridors to form the Greenlands System in Peel. Core areas are intended to contain provincially and regionally significant features and areas and therefore would not contain all woodlands that would be considered significant under the PPS. The criteria and thresholds for significant woodlands have therefore been divided in accordance with the ROP policy framework for the Greenlands System.</p>
	164	<p>CVC staff continue to recommend that SWH be listed as a Core Area (not mapped and the criteria and thresholds be placed in the appendix). As previously stated, in consideration of the treatment of all other Significant features in the Plan (i.e. Core Areas) and the cooperative relationship between CAs and the Region in respect to plan review and technical clearances (e.g. EIS requirements and clearance) this approach would seem logical and the most consistent. In addition, CVC staff continues to question whether identifying SWH as a NAC in the Plan is consistent with the requirements under the PPS (i.e. not protecting SWH as Core but deferring protection to area municipalities).</p> <p>In addition, a policy clearly stating that the criteria and thresholds for defining SWH may be updated from time to time without the need for an official plan amendment should be included. Potential changes which may trigger such an amendment would include changes to SARA, SARO, COSEWIC and associated regulations, as well as advances in local requirements and/or the sciences.</p>	<p>The <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> concluded that it was not possible to identify thresholds at a Regional scale for all of the significant wildlife habitat (SWH) criteria. It was also not possible to map the majority of SWH criteria due to lack of data and because thresholds are not available at a Regional scale. SWH identification will therefore require further evaluation and, in most cases, detailed site level analysis, to be undertaken through the local study process to identify habitat for protection. Further, the ROP's Greenlands System policy direction provides greater support for the classification of SWH as NAC features than as Core Area features. For these reasons, it is recommended that SWH be identified as a NAC to be interpreted, identified and protected in the area municipal official plans in accordance with ROP and PPS policy direction. In the future, Regional staff may reconsider the categorization of SWH as new information becomes available.</p> <p>The criteria for SWH will be listed as a figure in the ROP. Revisions to figures in the ROP do not require an official plan amendment.</p>
	165	<p>CVC staff continues to recommend that regionally significant life science ANSIs be included as Core Areas considering their significant contribution to the functions of the Greenlands System in Peel. As noted in previous correspondence, regionally significant ANSIs typically exhibit characteristics meeting criteria for significant woodlands,</p>	<p>Regional staff do not recommend that regionally significant life science ANSIs be classified as Core Areas. The categorization of provincially and regionally significant life science ANSIs considers the policy framework for Core, NAC and PNAC categories in the ROP. Provincially significant life science ANSIs are identified as Core Areas. Regionally</p>

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		significant valleylands, significant wildlife habitat, significant habitat of endangered and threatened species and/or environmentally significant areas.	significant life science ANSIs are identified as NACs. Natural features and areas occurring within regionally significant life science ANSIs meeting the criteria for Core Areas (e.g., Core woodlands) will be protected as Core Areas in the ROP.
	166	<p>CVC comments on the Glossary are as follows:</p> <p>Protect - The definition of 'protect' states 'to manage land and water in such a way that ensures that <i>significant</i> natural features and functions are retained.' CVC staff are unsure why this definition only pertains to 'significant' natural features and functions and is unclear as to how the term relates to 'functions' (is this 'significant' natural functions, natural functions or functions). For clarity, CVC staff suggest the following definition:</p> <p>'to manage land and water in such a way that ensures that natural features, including their ecological functions, are maintained.'</p> <p>Significant Wildlife Habitat – CVC staff question the intent and need for this additional definition. However, in providing this definition the opportunity to further clarify that the term 'significant' is synonymous with, or exceeds the criteria for, SWH. In addition, the reference to the Peel-Caledon Significant Woodlands and SWH Study is not dated (or contain the words as amended from time to time).</p>	<p>For clarity, ROPA 21 has been revised to include the following changes to the existing Glossary definition for 'protect':</p> <p><b><u>Protect</u></b>: to manage land and water in such a way that ensures that <i>significant</i> natural features and <u>areas including their ecological</u> functions are retained.”</p> <p>The definition of “significant wildlife habitat” has been deleted from the Glossary in order to remove the potential misinterpretation that the thresholds for significant wildlife habitat (SWH) in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> have been adopted as policy in the ROP. The intent of ROPA 21 is to list SWH as a NAC feature in order to allow further interpretation, identification and protection of SWH through area municipal official plan policy and the local study process including possible identification and refinement of thresholds. Significant wildlife habitat will be defined by reference to the Glossary definition for “significance” in the ROP which is consistent with the PPS definition. The <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> will continue to provide technical study recommendations and guidance for the identification of SWH through ROP policy in renumbered section 2.3.2.8 and Figure 5.</p>

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		<p>Threatened and Endangered Species – the proposed definition includes the term 'conservation concern', and suggests that the MNR maintain lists of species of conservation concern. CVC staff is uncertain as to the purpose of the reference to 'conservation concern' in the context of threatened and endangered species, and note that MNR does not maintain a list of 'species of conservation concern'.</p> <p>Watercourse – CVC staff continue to recommend the Region's definition of watercourse be consistent with the definition of watercourse under the Conservation Authorities Act (CAA). This is particularly crucial where CAs or other agencies identify a natural feature as a watercourse (consistent with the CAA definition), and associated hazardous land, but the feature is not recognized under the Region's proposed definition. This inconsistency may result in inconsistencies between the Region and CAs review of planning applications, in particular as they relate to requirements under Section 28 of the CAA. Additionally, this inconsistency may result in CA staff being unable to support Regional programs and initiatives as they relate to environmental assessments, master planning and development review responsibilities where conflicts in definition arise.</p> <p>CVC staff suggest the following revised definition be used:  'for the purpose of applying criteria for the identification of Core, natural Area and Corridor and Potential Natural Area Corridor Woodlands, an identifiable depression in the ground in which a flow of water regularly or continuously occurs.'</p>	<p>The last sentence in the Glossary definition for "threatened and endangered species" has been replaced with new definitions for "endangered species" and "threatened species".</p> <p>The <i>Conservation Authorities Act</i> definition for watercourse would potentially confer significance on woodlands that are in proximity to minor drainage features. This is not ecologically defensible and therefore an alternate definition is recommended in ROPA 21. The definition is in accordance with the recommendations of the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>.</p>
Credit Valley Conservation (additional comments from Josh	167	Further to your email dated July 13, 2009, CVC staff has reviewed the final proposed responses to Conservation Authority (CA) comments on ROPA 21 (dated July 6, 2009).	The comment is noted.

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Appendix II

Peel Region Official Plan Review (PROPR) - Regional Official Plan Amendment No. 21 - Natural Heritage, Agriculture, Air Quality and Integrated Waste Management

Updated October 22, 2009

Comment Received By	#	Summary of Comments	Region's Response/Action
Campbell dated July 29, 2009)		As discussed, CVC staff is generally satisfied that our comments have been adequately addressed and appreciate Regional staff's attention to these matters.	
	168	In the May 5, 2009 version of Regional Staff's proposed responses to comments on ROPA 21 it was indicated that discussion with MMAH was required to confirm agreement with Regional staff's proposed approach for exemptions within Core Areas. Please confirm that discussion and agreement with MMAH has been reached and Regional staff's proposed approach is consistent with the PPS.	See response to comment #1.
	169	All woodlands within Peel meeting any one of the six criteria noted in Table 1 should be considered Core such that they are appropriately protected under the Regional Official Plan. However, recognizing the current structure of the Region's Greenland System (i.e. Core Areas, Natural Areas and Corridors and Potential Natural Areas and Corridors) the proposed approach seems reasonable.	The comment is noted.
	170	Significant Wildlife Habitat should be listed as a Core Area of the Region of Peel Greenland System (not mapped and criteria placed in an Appendix or Table). This approach would seem most consistent with how Significant Wildlife Habitat is treated in Provincial and other Municipal plans and is scientifically defensible.	Regional staff recommends no change to the proposed categorization of significant wildlife habitat in the ROP. See response to comment #164.
	171	Regionally Significant Life Science ANSIs should also be classified as Core Areas of the Region of Peel Greenland System. Considering the characteristics of Regionally Significant Life Science ANSIs in CVC's jurisdiction, this approach would be consistent with the intent of the Regional Official Plan and is scientifically defensible.	Regional staff recommends no change to the proposed categorization of regionally significant life science ANSIs in the ROP. See response to comment #165.
Toronto Region Conservation (Written submission	172	TRCA staff commend the Region for incorporating policies in the Regional Official Plan in the following areas:	Regional responses to detailed comments are provided below.

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Comment Received By	#	Summary of Comments	Region's Response/Action
from David Burnett, Manager, Provincial and Regional Policy dated April 16, 2009)		<ul style="list-style-type: none"> <li>- Air quality;</li> <li>- Requirements for environmental impact studies for adjacent lands;</li> <li>- Developing urban forest strategies;</li> <li>- Invasive species management;</li> <li>- Greenlands management and stewardship; and</li> <li>- Direction to develop a Regional Greenlands Strategy to address future natural heritage systems planning needs.</li> </ul> <p>In addition, TRCA provides the following detailed comments on ROPA 21.</p>	
	173	Section 2.3 - Several paragraphs in the existing ROP describe the Core Areas of the Greenlands System (GLS). These should be amended to state explicitly that Core Area features equate, at the Regional level, to the significant features identified in section 2.1 of the Provincial Policy Statement (PPS). The staff report says that they are; the background papers state this by their titles. This should be clearly stated in the ROP.	See response to comment # 154 above.
	174	<p>Section 2.3.2.5 - This policy has a list of exceptions to the prohibition on development and site alterations in Core Areas of the GLS identified as a) through h). Below h) is a further subsection a) and b), which causes confusion in nomenclature as it duplicates the previous a) and b) used in this policy. It should be re-labeled.</p> <p>Additionally, the sentence above the second a) which strongly encourages area municipalities to consider a) and b), is too weak. It should be re-written as follows: "The area municipalities are directed to adopt policies for these exceptions that require a demonstration by the proponent that:</p> <ul style="list-style-type: none"> <li>i) there is no reasonable alternative...; and</li> <li>ii) the impact to the Core Area feature is minimized...."</li> </ul>	<p>Section 2.3.2.5 has been renumbered (re-labeled) as suggested. See also response to comment #1.</p> <p>Section 2.3.2.5, last paragraph, first sentence is revised to strengthen the policy direction in ROPA 21 to read as follows:</p> <p><del>"The area municipalities are strongly encouraged to consider adopting</del> <u>are directed to adopt appropriate policies that would to</u> allow the exceptions subject to it being demonstrated that..."</p> <p>The revision is recommended to clarify the intent that</p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
			appropriate mitigation for allowed exceptions is a required component of the policy.
	175	<p>Section 2.3.2.7 - Between "Allow" and "existing" add in "the continuation of".</p> <p>It should be made clear that expansions of agricultural uses into KNHF will not be permitted; or that farm practices that will negatively impact KNHF or HSF, such as the drainage of wetlands, will not be permitted.</p>	Policy 2.3.2.7 has been revised as suggested. The revision is consistent with the PPS.
	176	Section 2.3.2.8 c) - We disagree that "significant wildlife habitat" should be classified as a NAC. It is afforded a policy treatment in the PPS equal to the other significant features, and should therefore be classified as a Core Area component in the ROP, consistent with the remainder of significant features being so classified.	See response to comment # 164 above.
	177	Section 2.3.2.15 - This policy regarding valley and stream corridors needs to be clarified; the intent of the phrase "and define headwater areas including appropriate alterations..." is unclear, as these alterations would not likely be identified at the sub-watershed scale. We suggest the following rewording – "...and define headwater areas identified through sub-watershed studies. Any alterations proposed must be on the basis of detailed, site-specific environmental, engineering and/or planning studies and field work."	<p>Section 2.3.2.15 has been revised to read:</p> <p><del>"Direct the area municipalities, jointly with the Region and in consultation with the conservation authorities, to continue to: refine the boundaries of valley and stream corridors; establish setbacks and buffers for watercourses, and valley and stream corridors; and define headwater areas through subwatershed or broad scale environmental studies. Including appropriate alterations identified through sub watershed studies or appropriate environmental, engineering and/or planning studies and field work. Alterations to valley and stream corridors identified as Natural Areas and Corridors may be considered subject to recommendations in a subwatershed or broad scale environmental study and on the basis of detailed site specific environmental, engineering or planning studies and field work where such alterations contribute to the overall enhancement of the Greenlands System."</del></p> <p><u>"Direct the area municipalities, jointly with the Region and in consultation with the conservation authorities, to continue to: refine the boundaries of valley and stream corridors; establish setbacks and buffers for watercourses, and valley and stream corridors; and define headwater areas through subwatershed or broad scale environmental studies. Including appropriate alterations identified through sub watershed studies or appropriate environmental, engineering and/or planning studies and field work. Alterations to valley and stream corridors identified as Natural Areas and Corridors may be considered subject to recommendations in a subwatershed or broad scale environmental study and on the basis of detailed site specific environmental, engineering or planning studies and field work where such alterations contribute to the overall enhancement of the Greenlands System."</u></p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
			See also response to comment # 198.
	178	Section 3.2 Agricultural Resources – TRCA staff are pleased to see the new policy 3.2.2.10 regarding the promotion of community gardens and near-urban agriculture. However, it seems to be an isolated policy without any context. The introductory paragraphs and objectives for this section should be amended to provide an introduction for this policy to tie it into Peel's new sustainability framework in the context of healthier products, less "food miles" traveled and related reductions in greenhouse gases and climate change impacts.	Section 3.2, second paragraph is revised to add the following:  "…communities who depend on the industry. <u>In this regard, the policies aim to promote within the Region's new sustainability framework, an increased and diversified production of healthier local produce to improve health, mitigate climate change and strengthen the Regional economy.</u>
	179	Section 6.4 Waste Management - Sections 6.4.2.13 to 6.4.2.15 - Industrial, Commercial & Institutional Waste and Construction & Demolition Waste - These three policies seem to deal with the construction & demolition waste only. Either the title should be changed or policies added for industrial, commercial & institutional waste.	See response to comment # 76.
	180	Section 7.6 Regional Planning Initiatives - Section 7.6.2.10 c) - After "natural heritage studies" and before "and tools" add in ", watershed plans"	Section 7.6.2.10 c) has been revised to read:  "the consideration of natural heritage systems studies, <u>watershed plans</u> and tools being completed by the conservation authorities and Province; and"
	181	TRCA comments on the Glossary are as follows:  The definition for "adjacent lands" needs to be made consistent with the PPS by adding in at the end of "may have a negative impact on the feature or area", "or its ecological functions."	The definition for adjacent lands has been revised to read:  "those lands contiguous to a specific natural heritage feature or area where there is a probability that development or site alteration may have a negative impact on the feature or area <u>or its ecological functions</u> . The extent of adjacent lands may be determined in accordance with guidelines issued by the Province or based on municipal approaches that achieve the same objectives."

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Comment Received By	#	Summary of Comments	Region's Response/Action
		<p>Definition of "significant" - It should be made clear that this definition comes from the PPS and that it applies to Core Area features.</p> <p>The definition of "Minor Site Alteration" should be amended by adding the word "small" in front of "scale".</p> <p>Additionally, the existing ROP (2005) definition of "site alteration" needs to be amended to be in conformity with the PPS.</p> <p>The definition for significant feature, as it relates to the proximity criterion for defining Core Woodlands, is extremely confusing. In essence it appears to be stating that for this proximity criterion, significant features are NOT to be considered as significant features! I do not recall this being discussed during the TAT meetings. There is no ecological justification provided. This definition should be deleted in its entirety.</p> <p>The word "definite" in the definition for watercourse should probably be replaced with the word "defined".</p>	<p>The italicized references to "significant" in Section 2.3 provide the necessary link to the definition of "significant" in the Glossary. It is not necessary that we source the definition to the PPS. The existing practice in the ROP is not to source definitions.</p> <p>The existing definition in the ROP requires that site alteration must demonstrate no significant incremental or cumulative impacts. The site alteration may vary in its scale and intensity and therefore may not necessarily be "small scale" in all cases. No revision is recommended or required.</p> <p>The Glossary definition for site alteration has been revised to read:</p> <p><u>"activities, such as site grading, excavation or removal of top soil, vegetated cover and peat and the placing or dumping of fill and the placement of fill that would change the landform and natural vegetative characteristics of the site."</u></p> <p>The recommended definition for significant feature is not revised as suggested. The definition is sufficiently clear that it only applies to the proximity criteria for Core and NAC woodlands.</p> <p>The definition for watercourse has been revised as suggested.</p>
	182	TRCA comments on the Tables and Figures are as follows:	

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Comment Received By	#	Summary of Comments	Region's Response/Action
		<p>Table 1 – Criteria and Thresholds for Core, NAC &amp; PNAC Woodlands – TRCA continues to recommend that the criteria “any woodland = /&gt; 0.5 ha within 30m of a watercourse, surface water features or evaluated wetland” be used to define a Core Area woodland and not just a NAC woodland. The importance of woodland cover and buffers in protecting surface water features and functions is very important.</p> <p>Additionally, we recommend the deletion of the word “evaluated” in front of wetland. A wetland provides the same benefits to increasing woodland functions, whether or not it is evaluated.</p> <p>In the proximity criterion for NAC woodlands, we restate our comment detailed above under “Significant Feature”. This table should be amended and the definition deleted.</p> <p>Figure 5 – Criterion C6 - Remove the wording in brackets as it is not part of the criteria.</p>	<p>See response to comment # 163 above.</p> <p>For clarity the NAC Surface Water Quality Criterion in Table 1, second row, has been revised to read:                      “Any woodland =/&gt; 0.5 ha within 30 m of a watercourse, surface water features or <del>evaluated</del> <u>any wetland that is or can be identified as a wetland in accordance with the Ontario Wetland Evaluation System (OWES).</u>”</p> <p>See response to comment # 181 above.</p> <p>The suggested revision has been incorporated into ROPA 21.</p>
Toronto Region Conservation Authority (additional comments from David Burnett dated July 24, 2009)	183	I've now had the chance to review Regional responses to TRCA (and CVC) comments on ROPA 21. In general I am satisfied that our comments have been adequately addressed. Thank you for the consultative process that Peel has conducted. Minor outstanding points are outlined below.	The comment is noted.
	184	In the May 5 version of the comment response table CVC indicated the need for discussion with MMAH to arrive at the Region's response related to permitted exceptions within Core Areas. Can you please confirm that those discussions with MMAH were held and that the Region's final recommended policy response reflects the provincial position? (regarding minor development and minor site	See response to comment #1.

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Comment Received By	#	Summary of Comments	Region's Response/Action
		alteration in Core Areas).	
	185	Comment #163 -The sentence "Core areas are intended to contain regionally significant features and areas...." should be amended to add the words "provincially and" in front of "regionally".	Comment # 163 has been amended as suggested.
	186	TRCA staff continues to recommend that for defensibility and consistency sake, regionally significant life science ANSIs should be classified as a Core Area feature.	Regional staff recommends no change to the proposed categorization of regionally significant life science ANSIs in the ROP. See response to comment #165.
	187	Similar to our 3rd point, we continue to recommend that provincially and regionally significant wildlife habitat should be classified as a Core Area feature.	Regional staff recommends no change to the proposed categorization of significant wildlife habitat in the ROP. See response to comment #164.
Conservation Halton (Written submission from Jennifer Lawrence, Manager, Environmental Planning)	188	Given that the majority of the Region of Peel is within the CVC and TRC's watersheds, Conservation Halton staff have deferred to their review of ROPA 21. Conservation Halton staff have requested that the small tributary of Sixteen Mile Creek within Lisgar and the North 16 District be shown on Schedule A.	For clarity, only Core valley and stream corridor watercourses are shown on Schedule A. No revision to Schedule A is recommended.
Chippewas of RAMA First Nation	189	As a member of the Williams Treaties First Nations, the RAMA First Nation acknowledged receipt of ROPA 21 and forwarded it to their solicitor for further review.	Regional staff will continue to consult with First Nations through the Communications and Consultation component of PROPR.
Peel District School Board (Written submission from Paul Mountford, Intermediate Planning Officer dated March 17, 2009)	190	The Peel District School Board has reviewed ROPA 21 and has no comment.	None
Dufferin-Peel Catholic District School Board (Written submission from Jason Afonso,	191	The Dufferin-Peel Catholic School Board advises that they have no objection to the draft amendment.	None

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Appendix II

Peel Region Official Plan Review (PROPR) - Regional Official Plan Amendment No. 21 - Natural Heritage, Agriculture, Air Quality and Integrated Waste Management

Updated October 22, 2009

Comment Received By	#	Summary of Comments	Region's Response/Action
Planning Department dated March 19, 2009)			
Peel Regional Police (Written submission from Constable Thomas McKay dated March 18, 2009)	192	The Peel Regional Police advise that the draft amendment is satisfactory.	None
TransCanada Pipelines Limited (Written submission from Bob Lehman, President, Lehman & Associates dated March 30, 2009)	193	TransCanada Pipelines advises that it has one high pressure natural gas pipeline crossing a section of the Core Areas of the Greenlands System in the City of Brampton and that infrastructure that is subject to federal regulation is not subject to municipal zoning by-laws or official plans. TransCanada Pipelines requests that the exemptions for essential infrastructure in Section 2.3.2.5 c) be amended to exempt infrastructure "subject to Federal regulations."	The proposed wording for the exemption of essential infrastructure is consistent with the exemption for essential infrastructure in the PPS. Regional staff is not recommending that the revision be made as suggested.
Gagnon Law Bozzo (GLB) (Written submissions from Michael Gagnon on behalf of Bruce and Shirley Reed and the North West Brampton Landowners Group Inc. dated April 15, 2009)	194	Within the context of the City of Brampton Work Program in association with the Mount Pleasant Secondary Plan preparation process, the City of Brampton is conducting a detailed and exhaustive Subwatershed Study and Landscape Scale Analysis which applies to the whole of the Mount Pleasant Secondary Plan Area, lands located west of Mississauga Road in NWB, as well as lands located a considerable distance beyond the limits of NWB. This work is being conducted with a view to assisting the Province of Ontario in their ongoing work related to the identification and designation of Provincially Significant Wetlands and/or a local Natural Heritage System. This work is ongoing and we believe that it is premature for the Region of Peel to adopt any amendment which would pre-determine the outcome of the aforementioned analysis.	Regional staff does not support the comment that it is premature to adopt ROPA 21 prior to completion of the studies and secondary plan for the Mount Pleasant Secondary Plan Area. The Regional policies will guide and inform future planning approvals in Mount Pleasant and other secondary plan areas so that policy direction is consistent on a Regional and area municipal-wide basis.
	195	GLB have substantial concerns with the approach presented and have some interest in clarifying the relationship between the ongoing Regional studies (i.e., Significant Woodland and Significant Wildlife criteria development work not yet completed) and this ROPA. GLB's detailed comments,	The <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> was commenced in January 2008 to provide technical recommendations for the development of policies in ROPA 21. Regional and Town staff extended consultation on the study in 2009 in order to enable

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Comment Received By	#	Summary of Comments	Region's Response/Action
		observations, suggestions and recommendations are provided below.	stakeholders and the general public the opportunity to comment on both the study recommendations and policy in ROPA 21. The study was finalized in May 2009 after receipt of comments from the consultations.
	196	GBL objects to the inclusion of the word 'enhance' in Chapter 2, Section 2.2.1.2 on the basis that we do not believe that the responsibility for enhancing the natural environment should be the responsibility of those developing lands within the Region of Peel; it should not be a mandated responsibility.	Section 2.2.1.2 is one of two general broad objectives for Peel's large environmental systems which include Peel's airsheds, watersheds, groundwater resources and Lake Ontario. Enhancement of the natural environment in Peel including enhancement of the Greenlands System is already an established policy objective in the ROP in several existing policies (e.g. 1.3.5, 1.3.6, 2.1.3, 2.2.5, 2.2.6, 2.2.7 and 2.3). These policies were approved in 1998 and are not being amended in ROPA 21. The addition of the word 'enhance' in section 2.2.1.2 is consistent with the intent of the ROP. There is also enabling policy in the PPS supporting enhancement as an environmental policy objective and it is a widely accepted practice to include enhancement in development approvals for this purpose.
	197	<p>GBL objects to the inclusion of 'Natural Corridors' in Chapter 2, Section 2.3, on the basis that they are not falling within defined significant environmental feature categories. Simply because something is naturally vegetated or has the potential to be re-vegetated is insufficient basis for the identification of these areas for inclusion in a protection category.</p> <p>The Official Plan Policy references woodlands, waterbodies, watercourses, valleylands, etc. as potentially functioning as natural corridors. If these areas are areas of natural and scientific interest, environmentally sensitive or significant areas, escarpment natural areas, fish and wildlife habitat and/or threatened or endangered species and can be justified in the context of existing legislation, then there is no need to capture them in a category called 'Natural Corridors'; it would be redundant.</p>	<p>This policy does not indicate that the Region can arbitrarily require protection of natural or unvegetated corridors. Natural Areas and Corridors (NAC) are interpreted, identified and protected in accordance with area municipal official plan policy and in many cases identified and refined during the local study process for development approvals in accordance with comprehensive broad scale or site level studies. The policies for Natural Areas and Corridors were developed and approved as part of the Greenlands System policy framework in 1998 and are not being amended in ROPA 21 with the exception that criteria for some of the features are being revised.</p> <p>Revisions have been made to Section 2.3 to indicate the intent of the ROP with respect to non-vegetated corridors. See response to comment # 28.</p>

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		<p>The policy as drafted seems to imply that the Region of Peel can arbitrarily include naturally vegetated or areas that have potential for being revegetated - this could apply to any piece of land and is therefore unacceptable.</p>	
	198	<p>GBL objects to the inclusion of the wording 'any other valley and stream corridors that have not been defined as part of the Core Areas; in Chapter 2, renumbered 2.3.2.8 g), on the basis that the policy is too far open ended and could apply to any such feature without any justification being required.</p>	<p>One of the purposes of the Region's valley and stream corridor policies is to ensure consistency with the Provincial Policy Statement direction for significant valleylands. Core valley and stream corridors (considered "regionally significant") are identified in accordance with proposed new criteria in ROPA 21. NAC valley and stream corridors are identified in renumbered Section 2.3.2.8 g) to include "any other" valley and stream corridor that is not a Core valley but that may still be evaluated to be significant under the PPS.</p> <p>The implementation of the NAC policies is through the area municipal official plans which are to provide further interpretation, identification and protection of NAC features. This allows locally significant and smaller valley and stream corridors to be identified in area municipal official plans and/or through broad scale or site level studies at the local level. NAC valley and stream corridors are evaluated, identified and protected, as appropriate, in accordance with Regional, area municipal and provincial policy and are not identified and protected without justification.</p> <p>For clarity, Section 2.3.2.16 has been deleted and Section 2.3.2.15 has been revised as follows:</p> <p><u>"Direct the area municipalities, jointly with the Region and in consultation with the conservation authorities, to continue to: refine the boundaries of <i>valley and stream corridors</i>; establish setbacks and buffers for watercourses, and valley and stream corridors; and define headwater areas through subwatershed or broad scale environmental studies.</u>  <del>Including appropriate alterations identified through sub watershed studies or appropriate environmental, engineering</del></p>

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			<p><del>and/or planning studies and field work.</del> <u>Alterations to valley and stream corridors identified as Natural Areas and Corridors may be considered subject to recommendations in a subwatershed or broad scale environmental study and on the basis of detailed site specific environmental, engineering or planning studies and field work where such alterations contribute to the overall enhancement of the Greenlands System.</u></p>
	199	<p>GBL objects to the Clause referencing any other woodlands, cultural woodlands and cultural savannahs greater than 0.5 hectares (1.24 acres) in size being included in Chapter 2, renumbered Clause 2.3.2.9 b) and c), on the basis that these cultural features, as the label implies, are relatively young and are recovering from some degree of human and/or natural disturbance. In many cases, these cultural communities are growing up from fallow and abandoned farmland. These young features do not necessarily include important features or functions. Being younger and disturbance generated, these features tend to be more easily replaced and/or replicated on the landscape. The small threshold size (i.e. 0.5 ha) is not a reasonable threshold for consideration; the threshold should be substantially increased. It is reasonable to evaluate these features to determine their significance and that such evaluation should not necessarily reference a minimum size or certainly not to such a tiny threshold.</p> <p>It is also conceivable that these features could be sizable but of extremely poor quality and therefore of no significant value and by extension should not be protected. Conversely, it is conceivable that there could be a feature measuring 0.5 hectares containing species worthy of protection. It is inappropriate to simply protect something because of its size.</p>	<p>The policies for other woodlands, cultural woodlands and cultural savannahs as a Potential Natural Area and Corridor (PNAC) are in accordance with the recommendations of the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>. This study identifies that cultural woodlands and cultural savannahs are woodlands that have ecological values and can be significant woodlands under the PPS. The thresholds for cultural woodlands and cultural savannahs in Section 2.3.2.9 b) and Table 1 are appropriate and are recommended to ensure that the study findings are appropriately implemented in the ROP.</p> <p>It should be noted that 0.5 ha is not a threshold size that would automatically warrant protection. In accordance with Section 2.3.2.18, cultural woodlands and cultural savannahs will require a further evaluation through a study process in order to confirm their significance and protection as suggested in the comment.</p> <p>For all other woodlands in the Urban System, the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> indicated that a size threshold of 2 ha or less may also be relevant given the fragmentation and very low woodland cover in these urban areas. The study also indicated that smaller woodlands in urban landscapes may have a substantial social value that would warrant a smaller threshold size. It is therefore appropriate to identify 0.5 ha as a size threshold to ensure "other woodlands" are considered</p>

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			<p>in the development of area municipal official plan policy and through the local study process. The policy intent is to require further evaluation and therefore not all of these woodlands would automatically warrant protection.</p> <p>The threshold is also recommended for the Rural System to ensure that woodlands 0.5 to 4 ha in size are considered in area municipal official plan policy and/or through the study process for development approvals.</p> <p>See also response to comment #45 above.</p>
	200	<p>GBL recommends that Chapter 2, renumbered Section 2.3.2.16 be further amended to allow for new development and site alterations in valley and stream corridors where it is deemed that the action will ultimately contribute to the overall enhancement of the natural heritage system and where such actions are deemed to be consistent with the attainment of other Municipal, Regional and Provincial objectives.</p>	<p>Regional staff does not support the recommendation to expand the policy to allow larger scale new development and site alteration within valleylands as suggested. Minor exceptions in section 2.3.2.5 already allow "minor" development and "minor" site alteration subject to requirements to avoid or mitigate impacts to the greatest extent possible.</p>
	201	<p>GBL recommends that the term 'plantation' be defined in the Glossary to the Regional Official Plan. Plantations should not be included within designated features where those plantations were established for some commercial outcomes (i.e. managed for fruits, nuts, Christmas trees or nursery stock). Nor should plantations be deemed to be important where they are established and continuously managed for the sole purpose of complete removal at rotation. Plantations should only be included in designated natural features where a more detailed environmental study has demonstrated that the plantation exhibits substantial functional importance.</p>	<p>The following definition for 'plantation' has been incorporated into ROPA 21 to be added to the Glossary of the ROP:</p> <p><i>"a treed community in which the majority of trees have been planted or the majority of the basal areas in trees that have been planted, often characterized by regularly spaced rows. With time and forest management, natural regeneration can become established and eventually convert the community to natural forest."</i></p> <p>Appropriate exemptions for plantations are included in the Glossary definition for woodlands.</p>
	202	<p>GBL objects to the inclusion of 'cultural woodlands' and 'cultural savannahs' being interpreted as being included in 'woodlands' in Chapter 2, Section 2.3.2 renumbered Section 2.3.2.16, Woodlands Section 2.3.2.17 and Section 2.3.2.18</p>	<p>See response to comment # 199 above.</p>

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		<p>and as found in the Glossary to the Regional Official Plan. We present a number of relevant reasons for our opinion in point 4, above.</p> <p>This amendment itself brings into question the efficacy of including 'cultural woodlands' and cultural savannahs'. The basis for this assertion is that the policy speaks to these features requiring additional evaluation through natural heritage studies aimed at evaluating and confirming the quality and function of these features.</p>	
	203	<p>GBL recommends that any and all references to Population and Employment Forecasts for Peel as included in Chapter 4, Section 4.2.2.2 and elsewhere in the Official Plan be deferred until completion of the Growth Plan Conformity Exercise.</p>	<p>The amendment is simply renumbering Table 1 (population and employment forecasts) to Table 3 in order to accommodate the addition of two new tables in the ROP. Regional staff does not support deferring ROPA 21 until completion of the Managing Growth component of PROPR.</p>
	204	<p>GBL objects to the term 'adjacent lands' being included as a defined term in the Glossary to the Regional Official Plan, on the basis that the definition is highly subjective. We believe that the inclusion of this definition could have a detrimental and arbitrary impact on the limits of natural features.</p>	<p>The definition is consistent with the PPS. No revision is required or recommended.</p>
	205	<p>GBL objects to the inclusion in the Glossary to the Regional Official Plan of the change in the definition of 'significant' as it relates to the suggestion that the criteria for determining 'significance' can exceed what is recommended by the Province of Ontario in the absence of a set of criteria.</p>	<p>The definition is consistent with the PPS. No revision is required or recommended.</p>
	206	<p>GBL objects to the definition of 'woodlands' as included in the Glossary. More specifically, we object to the references to minimum area, as well as percentage cover and number of tree species, on the basis that the numbers are subjective and arbitrary. They do not in and of themselves speak to the quality of and/or significance of the 'woodlands'. We also question the reliability of making decisions based on a review of aerial photography. We object to 'cultural woodlands',</p>	<p>The recommended definition for woodlands is consistent with the PPS and recommendations in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>. No revision is required or recommended.</p>

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		'cultural savannahs' and 'plantations' as part of 'woodlands' for the reasons stated earlier and reiterated here as they relate to the agricultural basis for these features; they are not naturally occurring.	
	207	GBL objects to the inclusion of the 'new' definition of 'cultural savannahs' and 'cultural woodlands' as found in the Glossary for all of the reasons stated earlier.	See response to comment # 199 above.
	208	GBL objects to the identification of 'Core Areas of the Greenlands System' as illustrated on 'Schedule A' within the limits of the NWB planning area (the Reed lands located within NWB), on the basis that it is premature to do so until completion of the ongoing Mt. Pleasant Secondary Plan Subwatershed Study, Natural Heritage System exercise and related Provincially Significant Wetland Analysis all of which are interrelated.	<p>With respect to the comment that it is premature to adopt ROPA 21, please see the Regional staff response to comment # 26 above.</p> <p>With respect to property owned by Bruce and Shirley Reed in North West Brampton, Regional staff conducted a site visit to refine mapping of Core Areas on the Reed property at a site level. The mapping of Core Areas on Schedule A to ROPA 21 with respect to the Reed property has been revised based on the site visit.</p>
	209	GBL objects to the identification of 'Existing and Proposed Core Areas of the Greenlands System (ROPA 13 and ROPA 21) as illustrated on Appendix II within the limits of the NWB planning area (the Reed lands are located within NWB), on the basis that it is premature to do so until the completion of the ongoing Mt. Pleasant Secondary Plan Subwatershed Study, Natural Heritage System exercise and related Provincially significant wetland analysis all of which are interrelated. The highlighted areas on Schedule A do not exist on the ground today, and the use of out-dated aerial mapping does not constitute proper planning.	<p>With respect to the comment that it is premature to adopt ROPA 21, please see the Regional staff response to comment # 26 above.</p> <p>The Region has used the latest available air photo interpreted data to generate mapping of the Core Areas shown on Schedule A. The mapping is considered appropriate for Regional-scale official plan mapping purposes. It is understood that boundaries of the Core Areas are refined through the more detailed study process at the local level through secondary plan, block plan and site plan approvals. It is not necessary or good planning to require detailed site level planning at the Regional scale. Policy to recognize the need for refinement and the identification of features through the study process have been added to ROPA 21.</p>

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Stoneybrook Consulting Inc. (Written submission from Nancy Mather on behalf of the Vales of Humber Landowners Group dated April 23, 2009)	210	<p>The Vales of Humber Landowners Group are concerned that the natural heritage policies in draft ROPA 21 have the potential to affect the work completed to date on the Vales of Humber Secondary Plan and background studies.</p> <p>Detailed comments of the Group are provided below.</p>	Regional responses to detailed comments are provided below.
	211	Revisions to the mapping of Core valleylands on Schedule A include two western tributaries of the Humber River flowing southerly through the VHLG lands. Please clarify the basis upon which these two tributaries are recommended for inclusion on Schedule A.	<p>The easterly tributary meets the criteria for "major tributary" in accordance with the proposed policy for Core valley and stream corridors in Section 2.3.2.2 h) and Table 2. This tributary has direct confluence with the main branch of the West Humber River.</p> <p>The westerly tributary meets the criteria for "other tributary" in accordance with the proposed policy for Core valley and stream corridors in Section 2.3.2.2 h) and Table 2. It is identified as a Core valley and stream corridor as it contains habitat of aquatic endangered and threatened species.</p>
	212	Where is the extent of 'major tributaries' identified as Core valley and stream corridors defined?	The extent of major tributaries identified as Core valley and stream corridors is established in accordance with Section 2.3.2.2 h), Table 2 and the definition for Core valley and stream corridors in the Glossary to the ROP. The extent is shown on Schedule A and does not extend beyond the upstream limit of the defined valley landform (i.e., to the limit of crest of slope) and would exclude associated rural ravines and any associated urban ravines that have been evaluated not to be Core valleyland. The mapping methodology is further explained in the <i>Proposed Methodology to Update Mapping of Core Valley and Stream Corridors</i> attached as Appendix A to the Natural Heritage Policy Review Discussion Paper.
	213	Storm drainage works, by their nature, need to be located in, or partially located in valley systems. We suggest that storm drainage uses should be included in the infrastructure definition. This could be achieved by reverting back to	<p>The definition of infrastructure has been deleted and replaced with the following:</p> <p>"physical structures (facilities and corridors) that form the</p>

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		"essential servicing" wording of the current ROP or noting that storm drainage works are included in the essential infrastructure definition.	<u>foundation for development. Infrastructure includes: sewage and water systems, stormwater management works, septage treatment systems, waste management systems, electric power generation and transmission, communications/telecommunications, transit and transportation corridors and facilities, oil and gas pipelines and associated facilities.</u> "
	214	The list of exceptions in Section 2.3.2.5 should include environmental restoration and enhancement works.	Sections 2.3.2.5 a) and b) are interpreted to permit environmental restoration and enhancement works. No revision is required or recommended.
	215	<p>Stoneybrook Consulting Inc. provides the following comments related to Table 1 - Criteria and Thresholds for the Identification of Core, NAC and PNAC Woodlands:</p> <p>1) the age criterion needs to be clarified with respect to how age will be measured;</p> <p>2) the NAC woodland size threshold for age should be increased from 0.5 ha to 2 ha; and</p> <p>3) the inclusion of "special concern" species is questioned if it is the only factor that determines Core, NAC and PNAC woodlands under the Significant Species criterion.</p>	<p>The <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> recommends that the approach for determining woodland age be developed during implementation of the policy through the preparation of terms of reference for broad scale, subwatershed or site level environmental studies in consultation with the relevant conservation authority and/or MNR. The terms of reference for determining age would be accepted by the area municipalities and the Region. No revision to the age criterion is recommended or required.</p> <p>The <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> noted the rarity of late successional woodlands in the study area and recommended that even small inclusions of 0.5 ha should be recognized as significant.</p> <p>Regional staff recommends no revisions. The criterion for significant species in Table 1 is in accordance with the recommendations of the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>.</p>

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	216	<p>The following summarizes Stoneybrook's comments related to Table 2 - Criteria and Thresholds for the Identification of Core Valley and Stream Corridors.</p> <p>1) We do not agree that the criteria in Table 2, 'contains habitat of aquatic endangered or threatened species' warrants the prohibition of site alteration. It is our understanding that the <i>Endangered Species Act</i> (ESA) allows for modification to habitat of endangered or threatened species under certain circumstances. Its blanket prohibition should not be written in policy when the Act does not require this. To be consistent with the PPS, this should read, 'contains <u>significant</u> habitat of aquatic endangered or threatened species.'</p> <p>2) With respect to Table 2, we request clarification on how the criterion 'watercourse crosses municipal boundaries and provides linkage to other Core Areas of the Greenlands System' would be applied.</p> <p>3) We support the exclusion of ill-defined headwater drainage features including created headwater valley/stream corridors, discontinuous valley features and other non-valley landforms.</p>	<p>The proposed policy reflects the purpose of the <i>Endangered Species Act</i> to protect species that are at risk as well as their habitats and is consistent with the Provincial Policy Statement. An exception in Section 2.3.2.5 would continue to permit "minor" site alteration as well as essential infrastructure subject to ROP policies. For clarity, it is not recommended that the criterion be amended as suggested.</p> <p>MNR has advised Regional staff that the reference to 'significant' habitat of endangered and threatened species in the PPS has the same meaning as the habitat of endangered and threatened species in the <i>Endangered Species Act</i>. Changing the criterion to 'contains <u>significant</u> habitat of aquatic endangered or threatened species' would not change the intent of the policy.</p> <p>The watercourse must cross a municipal boundary and be present in two or more area municipalities. The watercourse would also have to intersect with at least one other Core Area of the Greenlands System (e.g. a significant wetland) along any of the extent of the watercourse feature. The valley/watercourse would then provide an ecological linkage that is considered to be regionally significant. If both of these requirements are satisfied, the defined valley portion (not entire watercourse length) is identified as being a Core valley and stream corridor on Schedule A.</p> <p>None</p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
Maurizio Rogato (Written submission on behalf of Solmar Development Corp. dated April 22, 2009)	217	Solmar Development Corp. has submitted comments on ROPA 21 in relation to the proposed development of Humber Station Villages in the Town of Caledon.  Specific comments are summarized below.	Responses to detailed comments are provided below.
	218	Solmar comments that approval of ROPA 21 in advance of reviewing the other amendments in PROPR is premature.	ROPA 21 is part of a scoped work plan to address conformity through the Peel Region Official Plan Review (PROPR). The development of ROPA 21 has ensured that policy is coordinated with the other PROPR amendments and therefore there is no requirement to delay adoption until all amendments are considered and approved. Regional staff has taken a coordinated and holistic approach through the entire PROPR process.
	219	With respect to Section 2.2.3.3.1, greater clarity is required to determine the scope and impact such "tools" will have on development applications.	ROPA 21 lays the foundation for further work on air quality. Further research is needed to inform the development of tool(s). As part of this process, the Region will consult with the area municipalities, key stakeholders, Province and general public. A proposal based on further research will be brought back to Council.
	220	Regarding Section 2.2.3.3.7, greater clarity is required to define 'harmful emissions' and what mitigation of such emissions by use of residential setbacks would entail.	Section 1.7.1 (e) of the Provincial Policy Statement states that "Long-term economic prosperity should be supported by: e) planning so that major facilities (such as airports, transportation/transit/rail infrastructure and corridors, intermodal facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries and resource extraction activities) and sensitive land uses are appropriately designed, buffered and/or separated from each other to prevent adverse effects from odour, noise and other contaminants, and minimize risk to public health and safety;".  "Harmful emissions" have been defined by the Ministry of the Environment, the regulatory agency responsible for air quality, in Schedule 3 of O. Reg 419. Harmful emissions include criteria air pollutants.

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Appendix II

Peel Region Official Plan Review (PROPR) - Regional Official Plan Amendment No. 21 - Natural Heritage, Agriculture, Air Quality and Integrated Waste Management

Updated October 22, 2009

Comment Received By	#	Summary of Comments	Region's Response/Action
			<p>Studies indicate that levels of certain contaminants (NO<sub>x</sub>, VOCs) are elevated immediately adjacent to traffic corridors and drop off within 300 meters. Further study and stakeholder consultation regarding appropriate residential setbacks, or other mitigation strategies, is required to inform the policy approach.</p>
	221	<p>With respect to the natural heritage component of ROPA 21, Solmar attached separate correspondence from their technical consultant (Savanta) dated July 30, 2008 outlining comments on the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>. These comments relate to various aspects of the technical study including the definition of woodlands, significant woodlands criteria and significant wildlife habitat criteria.</p>	<p>The comments from Savanta were submitted during the preparation of the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> and were previously reviewed by staff and the Region's consultants. This included discussions with Savanta staff at workshops and in a separate meeting to clarify issues. The discussions helped finalize study recommendations and develop policies that were incorporated into ROPA 21 which addressed most of the comments raised in the letter. Responses to comments received from Savanta on July 30, 2008 are included in the Consultation Summary for the study beginning on page 52.</p>
<p>Glen Schnarr &amp; Associates Inc. (Written submission on behalf of David Harris dated May 8, 2009)</p>	222	<p>Glen Schnarr &amp; Associates are requesting confirmation that ROPA 21 has not changed identification of the subject lands as part of the Urban System and that a golf course is a permitted use.</p> <p>They have also requested confirmation that residential uses on the 'tablelands' can continue to be considered through the local official plan and are not negatively affected by ROPA 21.</p>	<p>The Harris Farm property is identified as part of the Urban System. Policies with respect to active recreation, including golf courses, have been revised in ROPA 21. See response to comment #1 above.</p> <p>The regulation of land use is an area municipal responsibility. Information on specific land uses that may be allowed can be obtained from the City of Mississauga Official Plan.</p>
<p>Glen Schnarr &amp; Associates Inc. (Written submission on behalf of Kaneff Properties Limited dated May 5, 2009)</p>	223	<p>Glen Schnarr &amp; Associates are requesting that the proposed Royal Caledon Golf Course lands in Part of Lots 1, 2 and 3, Concession 1, EHS, in the Town of Caledon be removed from the 'Prime Agricultural Area' on Schedule B to the Regional Official Plan.</p>	<p>Non-residential uses that are allowed in accordance with section 3.2.2.9 of the ROP do not require an amendment to the Regional Official Plan to remove the Prime Agricultural Area shown on Schedule B. Applications within the Prime Agricultural Area are considered through the Town of Caledon's amendment process and any amendments to the Prime Agricultural Area, if necessary and appropriate, are</p>

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			therefore made to the Town of Caledon Official Plan. The proposal to permit the Royal Caledon Golf Course and amend the Town of Caledon Official Plan to redesignate the lands from Prime Agricultural Area to Rural was considered and approved by the Ontario Municipal Board in 2005 (OMB Decision/Order 2392). No revision to the Regional Plan is recommended or required.
Don Lobb (Written submission dated March 9, 2009)	224	<p>The Region of Peel should not extend woodland, wildlife and wildlife habitat protection beyond what is now provided by current (often onerous) legislation and regulation; i.e. Endangered Species Act (Ontario), Species at Risk Act (federal), Fisheries Act (Federal), Niagara Escarpment Commission Regs, Oak Ridges Moraine Regs, Greenbelt Regs, current Forestry/Woodlot Management Regs, and the Conservation Authorities Regs.</p> <p>Mr. Lobb comments that enhancement of natural areas in locations where there are continuing agricultural activities attracts some species of wildlife that is detrimental to agricultural crops. He notes that the Region should never increase or improve any habitat until MNR have an effective wildlife control program in place.</p> <p>He asks whether the Region is planning to compensate landowners for damage by wildlife to property, crops and livestock.</p> <p>He also asks how the Region intends to pay property owners compensation when they lose property value or the use of property because their properties attract endangered species, or their properties are declared Areas of Natural and Scientific Interest? Any action required of property owners to serve the public interest must be paid for by the public.</p>	<p>The natural heritage policies in ROPA 21 are recommended to ensure the Regional Official Plan is consistent with the Provincial Policy Statement which is a legislated requirement under the <i>Planning Act</i>. ROPA 21 is not extending protection beyond what is already provided in current legislation and provincial policy.</p> <p>Research summarizing existing wildlife management programs provided by the Ministry of Natural Resources and Ministry of Agriculture and Food is included in the Natural Heritage Policy Review discussion paper. The research describes the programs that are available to farmers whose agricultural operations are affected by nuisance wildlife.</p> <p>The Region is required to amend the ROP to be consistent with the PPS in accordance with the <i>Planning Act</i>. There is no requirement in the <i>Planning Act</i> for compensation when changes in policy affect development potential.</p> <p>New Greenlands Management and Stewardship policies are included in ROPA 21 to promote and support voluntary action by landowners. ROPA 21 includes recommended policies indicating Regional support for landowner stewardship initiatives. Examples of policy initiatives and programs include the Region's Greenlands Securement Project, Peel Rural Water Quality Program, and Ecological Goods and Services (EG&amp;S) incentives.</p>

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Appendix II

Peel Region Official Plan Review (PROPR) - Regional Official Plan Amendment No. 21 - Natural Heritage, Agriculture, Air Quality and Integrated Waste Management

Updated October 22, 2009

Comment Received By	#	Summary of Comments	Region's Response/Action
Randy McLeod (Email dated April 1, 2009)	225	He comments that it is his understanding that a woodlot needs to be under a woodlot management plan in order to qualify for the agricultural tax rate and recommends that we consider adding an exemption to the policy for significant woodlands to exempt woodlots that are under a managed forest agreement.	Plantation woodlands under a managed forest agreement that are managed for the sole purpose of complete removal at rotation without a woodland restoration objective are exempted from the policy. No revision is recommended or required.
Janet Kuzniar (Written comments submitted at the Brampton Open House on April 8, 2009)	226	Supports having Natural Areas and Corridors in the Urban System requiring a smaller size threshold as small green areas in the urban area have greater significance than in rural areas.	None
	227	Tree plantations need more protection. A 30 year old tree farm in Northwest Brampton was clear cut prior to submission of a quarry rezoning application. There were no laws preventing this unnecessary destruction. Some of the 30 year old plantation remains but is threatened by the proposed quarry.	Existing Regional Official Plan policy protects naturalized plantations that meet the definition of Core woodlands in the Regional Plan. Policies in ROPA 21 will maintain and clarify the existing policy.
	228	Land Acquisition for Greenlands – There is an opportunity to procure valleyland in Northwest Brampton. Lands acquired for greenlands should be publicly accessible. We should encourage more land acquisition of valleys in urban areas and in expanded urban boundaries such as Northwest Brampton.	Policies for Greenlands Securement including land acquisition are included in ROPA 21. No revision is recommended or required.
	229	Supports incentives for ecological goods and services.	Policies on incentives are included in ROPA 21. No revision is recommended or required.
	230	Construction waste and reuse must be better managed. We consume too much gravel, concrete and brick. The Region should require road and building contracts to use recycled waste.	Policy for waste recycling and diversion of construction and demolition waste are included in ROPA 21. No revision is recommended or required.
	231	Incentives should be provided to encourage small intensive food production in urban and rural residential areas.	OMAFRA provides funding for municipal and community projects to applicants with an approved business case. A

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			<p>typical business case would include the purpose and benefits of the project to the community, cost estimates and major disadvantages if any, and why the project is necessary and presented as the best solution to an identified need.</p>
<p>Olyshola (Written comments submitted at the Brampton Open House on April 8, 2009)</p>	<p>232</p>	<p>Indicates that Brampton is a great place to live but suggests that there is a need for greater awareness of what the Region is doing about air quality and the responsibility of private polluters. She suggests that the information should be available in colleges in the Region of Peel.</p>	<p>Education on the Region's air quality initiatives is an on-going process. Outreach and education activities related to air quality include the promotion of the Air Quality Health Index, smog and smog reduction, the 20/20 the Way to Clean Air program which seeks to reduce home energy use and kilometres travelled by 20% each by 2020.</p> <p>The Region promotes air quality through a variety of communication methods, including the internet, articles, presentations and displays. Information highlighting some of the Region's air quality activities can be found at <a href="http://webdev.peelregion.ca/health/cleanairpeel/">http://webdev.peelregion.ca/health/cleanairpeel/</a>.</p> <p>Curriculum is the decision of individual colleges and universities.</p>
<p>MarjanneLyn (Written comments submitted at the Mississauga Open House on April 9, 2009)</p>	<p>233</p>	<p>Requests that greater consideration be given to creating more green space and agricultural land use in the City of Mississauga.</p>	<p>The City of Mississauga plans to develop Lakeside Park, the first park from the Waterfront Parks Strategy, in addition to the existing parks and public open spaces in the city. Policy 3.2.2.10 supports area municipalities to develop community/market gardens in urban and near-urban areas to supply local markets with fresh fruits and vegetables.</p>
<p>Peel Regional Councillor Eve Adams (Oral comments submitted in meeting regarding ROPA 21 with Regional staff on May 14, 2009)</p>	<p>234</p>	<p>Noted concerns related to an anaerobic digester facility in Ward 5 and requested clarification on whether there are policies in ROPA 21 that address community impacts from waste facilities.</p>	<p>Policy 6.4.2.4 mentions permitting waste facilities in appropriate locations as detailed work is performed by the area municipalities to ensure compatibility with the surrounding community.</p>
<p>Ministry of Municipal</p>		<p>General Comments</p>	

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Affairs and Housing (letter dated August 21, 2009)	235	The Ministry requests that the Region include new policies for oil, gas and salt hazards, or former petroleum resource operations in accordance with policy 3.2.1 of the PPS.	<p>Regional staff agrees that policies should be added to the ROP and are proposing to do this through ROPA 26, the housekeeping amendment component of PROPR. The following are suggested policies for the purpose of adding petroleum resources policy to the ROP:</p> <p>Section 2.4.5 Other Natural Hazards is amended by adding policies for human-made hazards as follows:</p> <p><b>2.4.5 Other Natural <u>and Human-made</u> Hazards</b></p> <p><b>2.4.5.1 Objective</b>                      To ensure that new <i>development</i> and <i>site alterations</i> address other <u>human-made and natural hazards</u> as appropriate.</p> <p><b>2.4.5.2 Policy</b>                      It is the policy of <i>Regional Council</i> to direct the area municipalities to include policies in their official plans which address other <u>human-made and naturally occurring hazards</u>, such as those created by <u>existing petroleum resource operations, oil, gas and salt hazard and topographic constraints</u>, in accordance with the objectives and policies of this Plan, provincial policy and related planning documents.</p> <p>Section 3.7 ENERGY RESOURCES is amended by adding the following subheading and new section after Section 3.7.2.18:</p> <p><b>Petroleum Resources</b></p> <p>It is the policy of Regional Council to:</p> <p><b>3.7.2.19</b>                      Allow the exploration and production of petroleum resources except within the Urban System, Rural Service Centres, rural settlements within the Rural System as designated in an area municipal official plan, and Core Areas of the Greenlands System.</p>

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			<p>3.7.2.20                      Direct the Town of Caledon to develop policies in its official plan to ensure that the development of new petroleum resource operations is compatible with adjacent land uses, buildings and structures.</p>
	236	<p>The Region should be updating Section 2.4 of the Official Plan in order to be consistent with provincial policy: Section 2.4 Natural Hazards; Section 3.4 Water Resources; and Section 3.6 Cultural Heritage.</p> <p>More specifically with respect to the Special Policy Area (SPA) within the Natural Hazard policies, the PPS included additional policies and modified definitions. The Region should address SPA's given their location within the area municipalities.</p>	<p>Regional staff agrees that policies should be added to the ROP and are proposing to do this through ROPA 26. The following are suggested policies for the purpose of updating SPA policy in the ROP:</p> <p>Section 2.4.4.2 is to be revised by adding the following new policy:</p> <p>It is the policy of Regional Council to:</p> <p><u>"2.4.4.2.5</u>  <u>Direct the area municipalities to obtain approvals from the Province prior to establishing a new Special Policy Area or prior to revising the policies that would result in a change of use or density or the boundaries applying to an existing Special Policy Area."</u></p> <p>The Glossary definition for flood plain" has been revised as follows:</p> <p><b><u>"Flood plain:</u> for river, stream and small inland lake systems, the area, usually low lands adjoining a watercourse which has been, or may be <del>covered by flood water</del> <u>subject to flooding hazards</u>."</b></p> <p>The Glossary definition for "special policy area" is amended as follows:</p> <p><b><u>"Special policy area:</u> an area within a <i>community</i> that has</b></p>

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			historically existed in the <i>flood plain</i> and where site specific policies, approved by <u>both</u> the Ministers of Natural Resources and Municipal Affairs and Housing, are intended to <u>provide for the continued viability of existing uses (which are generally on a small scale)</u> and address the significant social and economic hardships to the <i>community</i> that would result from strict adherence to provincial policies concerning <i>development</i> . <u>The criteria and procedures for approval are established by the Province. A <i>Special Policy Area</i> is not intended to allow for new or intensified development and site alteration, if a community has feasible opportunities for development outside the <i>flood plain</i>.</u> "
		<b>Comments Related to Natural Heritage</b>	
	237	Section 2.1.1 - the Greenbelt Plan should be included with the references to Provincial Policy Statement, Growth Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan.	The reference to the Greenbelt Plan is included in the Region's Greenbelt Plan conformity amendment in ROPA 24.
	238	Section 2.2 - Large Environmental Systems - the introductory paragraph should be modified by including the Greenbelt's Natural Heritage System to the larger environmental systems description.	The reference to the Greenbelt Plan is included in the Region's Greenbelt Plan conformity amendment in ROPA 24.
	239	Section 2.3 - Escarpment Natural Areas - the second sentence should be modified to state "forested lands 300 metres back from the brow of the Escarpment slope".	Section 2.3 has been revised as suggested. See response to comment #148.
	240	Section 2.3 - Fish and Wildlife Habitat - in order to provide clarification between fish and wildlife habitats, it is advised to have a description and definition for each habitat. In addition, the description does not include all of the types of habitat that may be considered as significant wildlife habitat in accordance with the thresholds that the Region identified in the Significant Woodland and Significant Wildlife Study.	The Glossary to the ROP has been revised to include separate definitions for fish and wildlife habitat. The Glossary also includes definitions for 'significant' and 'wildlife habitat' that will include all of the types of habitat that may be considered significant wildlife habitat under the PPS.
	241	Section 2.3 - Habitats of Threatened and Endangered	Section 2.3 has been revised as suggested. See response to

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		Species - the last sentence of the description should be modified to state: "Current list of extirpated, endangered, threatened and special concern species are maintained by the Ministry of Natural Resources."	comment #148.
	242	Section 2.3 - Natural Corridors - the last sentence should be modified by deleting the word "intervening adjacent lands" and replacing it with "intervening lands" in order to clarify that intervening lands could be greater in area than just the adjacent lands.	Section 2.3 has been revised as suggested. See response to comment #28.
	243	Section 2.3 - Woodlands - in order to be consistent with the PPS description of woodlands, we recommend that the first sentence be deleted and replacing it with the following: "Woodlands are ecosystems comprised of treed areas, woodlots, forested areas and immediate environmental conditions on which they depend".	The proposed definition of woodlands has been revised in accordance with Regional staff comment #2 in Appendix III. The revised definition is considered to be consistent with the PPS.
	244	Section 2.3 - Wetlands - given the importance of wetlands definitions, we suggest that the description include the four major types of wetlands such as swamps, marshes, bogs and fens.	Section 2.3 has been revised as suggested.
	245	Section 2.3.2.3 should be modified by removing the reference to the MNR and replacing it with Province. At the end of the sentence the Region should include the ORM.	Section 2.3.2.3 has been revised as suggested.
	246	Section 2.3.2.5 - clarification is requested to confirm how the exemptions are consistent with the PPS including the exemptions for compatible recreation, development within approved Two Zone Flood Plain and Special Policy Areas and the direction given to the area municipalities with respect to the conditions under which the exemptions may be allowed. The Ministry recommends that the area municipalities be "directed" to specify the conditions under which the exemptions in Core Areas may be allowed rather than to be "encouraged".	Revisions to Section 2.3.2.5 have been incorporated into ROPA 21 to clarify the policy. See response to comment #1. In addition, the proposed definition for "existing use" is revised to clarify how existing uses in Core Areas are to be recognized through the area municipal official plans.  <b><i>Existing Use, Building or Structure:</i></b> a use, building or structure that lawfully existed on the date of approval of this Plan. <u>For further clarity, an existing use is interpreted to include only the currently occupied limits of the use as it</u>

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			<u>existed on the date of approval of this Plan."</u>
	247	Section 2.3.2.8 - in order for the Region to be consistent with Policy 2.1.4 of the PPS, it is advised that the Region classify 'significant wildlife habitat' within the Core Area component of the Greenlands System.	The proposed policy to identify significant wildlife habitat as a Natural Area and Corridor of the Greenlands System and direct the area municipalities to interpret, identify and protect significant wildlife habitat consistent with provincial policy is consistent with the PPS. See also response to comments #58, #157 and #159. No revision is recommended or required.
	248	Section 2.3.2.9 - Provincially significant earth science Areas of Natural and Scientific Interest (ANSI) under renumbered Section 2.3.2.9 (d) should be deleted and instead be put into the Natural Area and Corridors of the Greenlands System section of the OP (Section 2.3.2.8 – Natural Areas and Corridor category) given that provincially significant earth science Area of Natural and Scientific Interest, are to be protected from development and site alteration unless it has been demonstrated that there be no negative impacts on the feature or its functions (Policy 2.1.4 of the PPS).	Regional staff agrees to re-classify provincially significant earth science ANSIs to identify them as a NAC feature in the Greenlands System framework.
	249	Renumbered Section 2.3.2.10 - to ensure the Region's conformity to all provincial policy/plans, it is advised to add the Greenbelt Plan. In addition, the reference to the MNR should be removed.	The reference to the Greenbelt Plan is included in the Region's Greenbelt Plan conformity amendment in ROPA 24. The reference to the MNR has been deleted from ROPA 21 as suggested.
	250	The proposed new subsection 2.3.2.19 directs the area municipalities to include or develop criteria and thresholds for woodlands identified as Natural Areas and Corridors, and Potential Natural Areas and Corridors. The proposed criteria and thresholds should include environmental factors, in addition to physiographic, social and economic factors.	The recommendation to add environmental factors has been added to Section 2.3.2.19 as suggested.
	251	Section 2.3.2.21 - this section provides direction as to the requirements for lands adjacent to the Greenlands System. However, there does not appear to be any policy regarding the assessment of impacts from development in the features	Section 2.3.2.21 has been revised as follows:  " <u><b>Environmental Impact Studies - Adjacent Lands</b></u>

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		<p>themselves. Proposed Section 2.3.2.5 provides a list of activities that may be permitted in the Core Areas of the Greenlands System. It would be reasonable to require environmental impact studies for some of these uses. It would also be appropriate to direct the area municipalities to put policies in their official plans regarding adjacent lands and the requirements for environmental impact studies for development proposed in certain features, as well as, for lands adjacent.</p> <p>In order to provide clarification between the defined term (adjacent lands) and the text used in the policy (lands adjacent), the Region should use the same term throughout the policies.</p> <p>The 'adjacent lands' definition should be more consistent with the definition in the PPS. The Ministry would like to be informed if this policy would be triggered for agricultural uses. If it is not, it is advised that the intent be clarified.</p>	<p><b>2.3.2.21</b>                      Direct the area municipalities to require environmental impact studies for <i>development</i> and <i>site alteration</i> <del>proposed on lands adjacent to</del> <u>within and on adjacent lands to the Greenlands System</u> and to include policies in their official plans that <i>development</i> and <i>site alteration</i> shall not be permitted <del>on lands adjacent to the Greenlands System</del> unless the ecological functions of the <u>features and adjacent lands</u> have been evaluated and it has been demonstrated that there will be no negative impacts on the natural feature or its functions or the requirements of Section 2.3.2.5 have been satisfied.</p> <p>This requirement for environmental impact studies may be reduced..."</p> <p>The Glossary definition for adjacent lands has been revised as follows:</p> <p><b>"Adjacent lands:</b> those lands contiguous to a specific natural heritage feature or area where <del>there is a probability</del> it is likely that development or site alteration <del>would</del> may have a negative impact on the feature or area. The extent of the adjacent lands may be <del>determined in accordance with guidelines issued by</del> <u>recommended by the Province</u> or based on municipal approaches which achieve the same objectives."</p> <p>The policy is triggered for applications for new agricultural development or site alteration requiring approval under the <i>Planning Act</i>.</p> <p>See also response to comment #156.</p>
	252	<p>Section 2.5.2.5 should be modified by replacing the beginning of the sentence with more direct policies. For example "Direct area municipalities to restore the Natural</p>	<p>Section 2.5.2.5 is revised as follows:                      "Encourage the area municipalities to restore and enhance</p>

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		Areas and Corridors in the Greenlands System within the Parkway Belt West Plan.”	<u>the natural heritage features and functions within the Parkway Belt West Plan Area</u> Ensure that the possibility of the Parkway Belt West Plan Area providing Natural Areas and Corridors in the Greenlands System is explored, evaluated and protected, as appropriate, in cooperation with the area municipalities and the Ministry of Municipal Affairs and Housing.”
	253	Section 7.2.2.3 should be modified by deleting it and replacing it with the following: “More detailed mapping of the Core Areas of the Greenlands System will be provided in the area municipal Official Plans, and will be further determined on a site specific basis through studies, as may be required through the planning approval process, in accordance with relevant agencies.”	Section 7.2.2.3 has been revised as follows:  <del>“The exact lines and boundaries for the information contained in the generalized schedules will be defined in the area municipal official plans, where applicable.</del> The boundaries of the Core Areas of the Greenlands System shown on Schedule A are intended to be general in nature. More detailed mapping of the Core Areas of the Greenlands System <u>will be provided in the area municipal official plans</u> , and will be <u>further</u> determined on a site specific basis through studies, as may be required <u>by the area municipalities</u> through the <u>local</u> planning approval process, in consultation with <u>the Region and</u> relevant agencies. Due to the general nature of the Core Areas boundaries on Schedule A, an amendment to the Plan is not required for minor boundary adjustments to the Core Areas of the Greenlands System as determined through required studies <u>or field investigations.</u> ”  It is not recommended to revise “in consultation with relevant agencies” to “in accordance with relevant agencies”. The current wording reflects the municipal authority under the Planning Act to make decisions in consultation with agencies.  See also response to comment #100.
	254	Section 7.6.2.10 c) – should be modified by adding “watershed plans” after natural heritage systems studies.	Section 7.6.2.10 c) has been revised as suggested. See also response to comment #180.
	255	Glossary – the minor site alteration definition should be	Both minor development and minor site alteration are current

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		modified by stating 'small' in front of 'scale'. In addition, the Ministry would like to know the intent/purpose of the term.	permitted exceptions within Core Areas of the Greenlands System. The intent is to allow appropriate exceptions that are minor in nature and that demonstrate no significant incremental or cumulative impacts to features or functions. ROPA 21 is adding a definition for minor site alteration to clarify the type of site alteration that may be allowed as an exception in accordance with Section 2.3.2.5. Minor development is already defined in the ROP. No revisions are recommended or required.
	256	<p>Glossary - the definition of significant should be modified for clause (c) in order to reflect the criteria identified through the Significant Woodlands and Significant Wildlife Habitat Study.</p> <p>Clause (d) should be modified by removing the reference to policy 2.1 as this refers to policy 2.1 of the PPS and not to the Region's OP.</p> <p>Clause (f) refers to petroleum resources. However, there are currently no policies in the OP that speaks to petroleum resources.</p>	<p>Regional staff does not agree that the definition be revised as suggested. Criteria for significant wildlife habitat have been added by way of a new figure in the ROP. Revised policy will direct the area municipalities to interpret, identify and protect significant wildlife habitat in accordance with the ROP and provincial policy.</p> <p>Clause (d) has been revised as suggested.</p> <p>Policies for petroleum resources will be added through ROPA 26.</p>
	257	Glossary - site alteration definition should be modified to conform to the PPS definition.	<p>The definition for site alteration has been deleted and replaced with:</p> <p><u><b>"Site alteration: activities, such as grading, excavation and the placement of fill that would change the landform and natural vegetative characteristics of a site."</b></u></p>
	258	Glossary - the definition of woodlands is different from the provincial direction in part (b) by requiring a tree crown cover of over 25% rather than over 10%. If the definition of woodlands starts at 25%, then how can woodlands interpreted to include cultural savannahs with less than 25% cover? The first sentence of the fourth paragraph should be replaced with the following: "Notwithstanding the above, woodlands do not include a plantation that is:"	The proposed woodlands definition is consistent with the woodland definition in the PPS and the recommendation in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i> . The 25% threshold for the identification of woodlands is consistent with thresholds provided in the ELC Keys and in the ELC Community Tables which distinguish between open community and treed community types. Regional staff is not recommending that

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			<p>open community vegetation types with tree crown cover less than 25% be identified as woodland in the Region of Peel. The proposed definition for cultural savannahs in ROPA 21 has been revised to increase the reference to 11% tree canopy cover to 25%.</p> <p>See also Regional staff comment #2 in Appendix III.</p>
	259	Glossary - it is recommended that there be two definitions – either one for Threatened Species and one for Endangered Species or one definition that provides for both categories.	The Glossary has been revised to provide separate definitions for endangered and threatened species.
	260	Glossary – provincially significant wetland definition should be revised by deleting “Classes 1 to 3.	The definition has been deleted.
	261	Table 1 - the level of protection assigned to Natural Areas and Corridors (NAC), and Potential Natural Areas and Corridors (PNAC) woodlands is not clear. It is not clear how they relate to the conventional significant woodland of the PPS.	Policy protection for Core Area, NAC and PNAC features is provided in renumbered Sections 2.3.2.3 and 2.3.2.10 of the ROP. See also response to comment # 154.
	262	Table 1 - it is not clear how woodland ages older than 90 years are to be determined, such as whether the existences of a woodland in that spot for 90 years or by the existence of a certain number of trees over 90 years old (and how the ages are to be established).	Guidelines for the determination of woodland age will be developed by the conservation authorities for review by the Region and the area municipalities.
	263	Table 1 - MNR has noted previously, through the review of the SW&SWH Study, that the list of specific forest communities highlighted for significance under “Significant Species” in Table 1 does not seem complete. The Region should consider adding some swamp communities and locally rare communities	<p>Regional staff has reviewed the list of forest communities in Table 1 and has confirmed that the list is complete. Further information on the selection of the forest community types for the significant species criterion is provided in the <i>Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study</i>.</p> <p>With respect to locally rare communities, there is no study or survey that credibly identifies locally (i.e. in Peel) significant communities, so there is no defensible basis for including</p>

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			them at this point.
	264	Figure 5 - this figure should provide further clarification on the recommended thresholds for each of the criteria. It is recommended that Table 9 from the SW&SWH Study be the table that is used for the OP. The table could be modified to show information in columns "Significant Wildlife Habitat (SWH) Criteria" and "Recommended Thresholds (where applicable)". The second column could be renamed as "Thresholds (where applicable)". The Table could be further modified to only include the criteria that the Region has accepted for identifying SWH.	<p>See response to comment #164.</p> <p>The following criteria that are not applicable in Peel have been deleted from Figure 5.</p> <ul style="list-style-type: none"> <li>- Migratory landbird stopover areas - Town of Caledon</li> <li>- Migratory butterfly stopover areas - Town of Caledon</li> <li>- Wild turkey winter range</li> <li>- Mineral licks</li> </ul> <p>The column in Figure 5 indicating the criteria is not recommended is also deleted.</p>
<b>Comments related to agriculture</b>			
	265	<p>Section 3.2.2 provides policy on the Region's Prime Agricultural Area. In order to provide clarity on the purpose and function of the 'minimum distance separation formulae', the term should be placed in italics and defined in the Glossary section of the OP. For reference, the PPS defines minimum distance separation formulae as: "formulae developed by the Province to separate uses so as to reduce incompatibility concerns about odour from livestock facilities".</p> <p>The Region must clarify (through policy) that not all uses permitted within the Prime Agricultural Areas are subject to the minimum distance separation formulae.</p>	<p>Section 3.2.2.2 is deleted and replaced with the following:</p> <p>"Require compliance with the minimum distance separation formulae in the Prime Agricultural Area."</p> <p>The Glossary has been amended to add a new definition for "minimum distance separation formulae" as follows:</p> <p><b><u>"Minimum distance separation formulae: formulae developed by the Province to separate uses so as to reduce incompatibility concerns about odour from livestock facilities."</u></b></p>
	266	Section 3.2.2.4 provides policy direction regarding phasing of development on agricultural lands within the 2031 Regional Urban boundary. In order to clarify the intent, it is suggested that the phasing be identified in the local official plans.	<p>Section 3.2.2.4 has been revised as follows:</p> <p>"Encourage, where appropriate, the phasing of development <u>in accordance with the area municipal official plans</u> so that agricultural..."</p>
	267	Proposed new Section 3.2.2.8 should be modified by updating the terms 'primary agricultural uses' and 'agricultural related uses' in order to be consistent with the PPS	The Glossary definitions for "prime agricultural uses" and "agriculture-related uses" have been updated to reflect the PPS definitions for "agricultural uses" and "agriculture-related

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		definitions.	uses".
	268	Section 3.2.2.9 - we recommend that the term 'agri-food sector' be defined under proposed Section 3.2.2.9 and Glossary.	The Glossary has been amended to add the following new definition for "agri-food sector" as follows:  <b><u>"Agri-food sector: sector of the economy involved in the production, processing, assembly and sale of agriculture goods and services."</u></b>
	269	Renumbered Section 3.2.2.11 is amended by deleting and replacing the policy direction that provides parameters on permitting a non-residential use in the Prime Agricultural Area. The PPS directs the long term protection of prime agricultural areas for agricultural use. The Ministry would like to know how the Region proposes to implement this policy.	Section 3.2.2.11 is implemented through the Town of Caledon Official Plan and the decisions of the Town of Caledon Council on applications requiring approval under the <i>Planning Act</i> . The policy directs the Town to only permit a non-residential use in the Prime Agricultural Area, subject to an area municipal official plan amendment under certain conditions.
	270	The Ministry requests clarification of the intent of Section 3.2.2.12.	The policy provides direction to the Town of Caledon to permit specified uses and lot creation within the Prime Agricultural Area. The policy is consistent with the PPS.
<b>Comments related to air quality</b>			
	271	<p>Section 2.2.3 - many of the proposed policies within Section 2.2.3.3 state that "It is the policy of Regional Council to encourage area municipalities to ..". Given the purpose and the role of Ontario's municipal structure, the Region should direct area municipalities to implement air quality policies at the local level.</p> <p>From a consistent perspective, the reference to 'airsheds' under Section 2.2 should be changed to 'air quality'.</p> <p>As a means to improve air quality, the Region should add a new policy within Section 2.2.3.3 to direct area municipalities to promote compact form, transit oriented development; focus transit intensive land use that is well served by public transit; and improve the mix of employment and housing uses, as a</p>	<p>Based on our discussion with area municipal staff and the Five Principles of the Regional Official Plan the proposed wording "to encourage" is considered appropriate for these air quality policies.</p> <p>The only reference to airsheds appears in the introduction of the air quality section as follows: "Air quality is a significant issue which can negatively affect human health, the environment and economy. Peel is part of a Great Lakes Basin climatic system or airshed." In the context of the sentence, airsheds is the correct term to be used.</p> <p>Policies to address air quality through compact urban form, mixed uses, transit supportive development, and through transportation planning are being provided through other</p>

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		means to reduce car pollution and/or encourage shorter commutes.	PROPR ROPAs (e.g. ROPA 24 on Growth Management).
<b>Comments related to integrated waste management</b>			
	272	Section 6.4.2.2 - it is advised that the Region add the words "area municipalities" after "support efforts for".	Section 6.4.2.2 has been revised as follows:  "Actively encourage, promote and support <u>the</u> efforts of government, the <u>area municipalities</u> , the private sector..."
	273	Section 6.4.2.3 - in order to have strong policy direction, it is advised that the Region add the following text "within the Region" after the following text "Require new development".	All policies in the Regional Official Plan apply within the Region. It is not necessary to add the suggested wording. See also response to comment #14.
	274	Section 6.4.2.4 - the policy should include direction on ensuring appropriate land use compatibility to adjacent lands. Certain studies such as Methane/gas and leachate study, would be required if a landfill site application is proposed within 500 metres of the perimeter of the fill area of an operating or closed land fill site/dump. The Region should include study requirements.	Policies on land use compatibility and study requirements are provided in detail in the area municipal official plans for siting of new waste management facilities. From the request by the Province, new policy is required to address development of land adjacent to or on existing and closed waste management facilities.  New section 6.4.2.25 is included as follows:  "Direct the area municipalities to develop policies for development including land use compatibility within or on lands in close proximity to active and closed waste management facilities including landfills."
	275	Section 6.4.2.5 - the Ministry would like to be informed on the intent, and how the Region foresees the implementation of proposed policy 6.4.2.12, under the Energy from Waste subheading.	The intent is to locate new waste management facilities in areas that are compatible with the objectives and policies of ROP and area municipalities Official Plans.  For implementation of section 6.4.2.12 the Region would like the Province to recognize energy from waste as a source of diversion.  Section 6.4.2.12 is revised as follows: "Request the provincial government to <del>link waste</del>

<sup>1</sup> Underlined text indicates addition or revision. Strikethrough text indicates a deletion.

Comment Received By	#	Summary of Comments	Region's Response/Action
			<p><del>management and energy policies more closely recognize energy from waste as a method of waste diversion</del> to ensure that the maximum resources are extracted from all municipal waste prior to final disposal.”</p>
	276	<p>Section 6.4.2.16 - the Region should consider directing area municipalities to incorporate waste diversion for all multi-residential buildings in the local OPs.</p>	<p>Residential waste collection is the Region's responsibility. The Region's Waste Collection Design Standards Manual requires all new residential dwellings to incorporate waste diversion such as recycling that is convenient to residents. New section 6.4.2.3 will require all new development to comply with the Manual.</p> <p>For the small proportion of multi-residential properties that do not have Regional waste collection, the EPA Reg. 103/94 requires owners of those properties to divert waste. Only the MOE has the authority to enforce this regulation.</p>
	277	<p>We note that in Item 63 of the amendment, there is a policy which directs the area municipalities to develop, review and amend official plan policies in order to permit waste facilities. While we do not have an issue with this type of policy, we would also encourage that the Region itself, as part of your regional services, should also be planning and identifying future potential waste facilities, in order to service a growing future population. As noted in policy 1.6.8.1 of the PPS, waste management systems need to be provided that are of an appropriate size and type to accommodate present and future requirements....To this end, it is not clear how this policy direction is being met on a regional basis?</p> <p>Further, proposed policy 6.4.2.18 seems to also discourage this more by stating that new landfill sites at other locations in the Region (with the exception of the Caledon landfill) will be discouraged.</p> <p>We would recommend that the official plan include some policies around the establishment of new landfill sites and</p>	<p>The Region's Long Term Waste Management Resource Strategy is being updated to identify future potential waste management facilities. Peel's Waste Management division has forecasted demand on waste stream tonnages and compared it to capacity at existing facilities to determine future infrastructure requirements. The final step will be to consider appropriate areas in the Region for the required new infrastructure.</p> <p>For clarity, section 6.4.2.1 is revised as follows:</p> <p><del>Prepare</del> <u>Maintain</u>, in cooperation with the area municipalities, <del>a the Long Term Waste Resource Management Strategy</del> to achieve the waste management objectives <u>by focusing on reduction, reuse, and recycling programs, and recovering resources of residual waste prior to landfill.</u></p> <p>See comment #75 regarding section 6.4.2.18.</p>

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Comment Received By	#	Summary of Comments	Region's Response/Action
		<p>what are some of the criteria that may be considered in terms of establishing a new site.</p>	<p>No new landfill sites are contemplated in Peel as the Region is focusing on the three Rs (recycling, reduction, reuse), centralized composting, energy from waste, and opportunities for new and emerging technologies. The Warwick, ON landfill used by the Region has a 25 year disposal capacity.</p> <p>Section 6.4.2.1 is revised as follows to highlight the hierarchy of waste management programs available:</p> <p><u>"Prepare, in cooperation with the area municipalities, a Waste Management Strategy to achieve the waste management objectives by focusing on reduction, reuse, and recycling programs, and recovering resources of residual waste prior to landfill."</u></p>
	278	<p>Section 6.4.2.21 states to "View the use of land for landfill during the operation life of the site as an interim land use until such time as the land is deemed by Regional Council to be suitable for other uses.". The Ministry would like to be informed on how the Region foresees the implementation of this policy. The term "interim" in the policy should be clarified as it means short term and should not be applied in this context.</p>	<p>Section 6.4.2.21 will be implemented through the appropriate local official plan approvals process in accordance with all applicable legislation.</p> <p>Section 6.4.2.21 is revised as follows:</p> <p><u>"View the use of land for landfill during the operational life of the site as an interim land use, until such time as the land is the landfill is deemed by the Ministry of Environment and Regional Council to be closed and the land is suitable for other uses."</u></p>
	279	<p>Section 6.4.2.22 should be modified by adding the following text "and/or any provincial legislation and standard" at the end of the sentence.</p>	<p>Section 6.4.2.22 is revised as follows:</p> <p><u>"Review proposed development in proximity to the Caledon landfill site for consistency with the objectives and policies in this Plan, the Town of Caledon Official Plan, the Niagara Escarpment Plan and the Ministry of the Environment guidelines and any applicable Provincial legislation, policies, standards, and guidelines."</u></p>
<p>Comments related to the Oak Ridges Moraine Conservation Plan</p>			

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Appendix II

Peel Region Official Plan Review (PROPR) - Regional Official Plan Amendment No. 21 - Natural Heritage, Agriculture, Air Quality and Integrated Waste Management

Updated October 22, 2009

Comment Received By	#	Summary of Comments	Region's Response/Action
	280	Section 2.2.9.3.22 - This section states to incorporate by official plan amendment, the applicable objectives and requirements of a completed watershed plan into the Official Plan. The Ministry would like to know the status of this work.	The Region will be completing a review of watershed plans being prepared by the conservation authorities for all of the Region's Oak Ridges Moraine watersheds. It is anticipated that this review will be completed as a separate project and that an amendment will be brought forward for Council's consideration if policy revisions are needed. Regional staff has been advised that the watershed plan for the West Holland River is still being developed by the Lake Simcoe Region Conservation Authority.

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