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November 3, 2021

Sent via email only

Virpal Kataure – Principal Planner
Regional Planning & Growth Management Division
Region of Peel
10 Peel Centre Drive, Suite A
Brampton, ON L6T 4B9

Dear Virpal Kataure,

**RE: Provincial Review Comments
Draft Peel 2051 Regional Official Plan – Region of Peel Municipal Comprehensive
Review
MMAH File No. 21-OP-215276**

Thank you for providing the Ministry of Municipal Affairs and Housing (“MMAH”) with the opportunity to review and provide comments on the Regional Municipality of Peel’s (“Region”) draft Regional Official Plan Amendment (“ROPA”). MMAH staff understand that the draft ROPA is to implement A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019, as amended (“Growth Plan”).

MMAH staff understand that the draft ROPA is a comprehensive document that includes previously submitted proposed policies and mapping changes, for which One Window comments have been provided, as well as new proposed policies and mapping for the Region’s municipal comprehensive review (“MCR”).

As part of the One Window Provincial Planning Service, the draft ROPA was reviewed by staff at the Ministry of Transportation (“MTO”); Ministry of Energy (“ENERGY”); Ministry of Northern Development, Mines, Natural Resources and Forestry (“NDMNR”); Ministry of Environment, Conservation and Parks (“MECP”); Ministry of Agriculture, Food and Rural Affairs (“OMAFRA”); Ministry of Heritage, Sport, Tourism and Culture Industries (“MHSTCI”); and the Ministry of Economic Development, Job Creation and Trade (“MEDJCT”).

The comments contained in this letter and in **Appendix A** are based on a review of the draft ROPA in the context of consistency with the Provincial Policy Statement, 2020 (“PPS”) and conformity with the Growth Plan, 2019, Greenbelt Plan, 2017, the Oak Ridges Moraine Conservation Plan, 2017 (“ORMCP”) and the Niagara Escarpment Plan, 2017 (“NEP”).

MMAH staff note the following high-level comments on the draft ROPA, with additional comments provided in Appendix A.

Lower-Tier Policy Direction

MMAH staff continue to have concerns that there are a number of policies in the draft ROPA that direct lower-tier municipalities to implement key provincial policies (e.g., Agricultural System and Growth Plan Natural Heritage System). These provincial policies generally include language such as “shall” or “will”. It is recommended that the Region incorporate key provincial policies at the upper-tier level to ensure a consistent approach across the Region and to coordinate effective implementation of provincial policies.

Greenlands System Policies

Comments regarding the Greenlands System policies were previously provided in a One Window Comment Letter (dated November 27, 2020) on the Region’s draft Greenlands System policies and Growth Plan natural heritage system policies. MMAH staff continue to have concerns that it is unclear what and where the features comprising the Greenlands System are located in relation to the Greenbelt Plan and the Growth Plan. Outstanding comments in that letter continue to apply to this draft ROPA and are provided in Appendix A.

Land Needs Assessment & Employment Area Conversions

The LNA establishes a total land need of 4,524 hectares to 2051, including 3,052 hectares of community area land and 1,490 hectares of employment area land. MMAH staff note that the conceptual settlement area boundary expansion identified in Schedule Z1 of the draft ROPA, submitted as part of the Region’s June 29, 2021 submission, is approximately 8,000 hectares. MMAH understand that the Region is also considering an option to expand up to approximately 9,000 hectares, as of September 2, 2021. As the LNA only identifies a need for 4,524 hectares, it is unclear how consideration of expansions beyond this land need conform to Growth Plan policies 2.2.1.5 and 2.2.8.2.

Additionally, MMAH staff understand that the Region is proposing to convert 273.4 hectares of employment lands to non-employment uses. MMAH note that demonstration of how each of the proposed employment conversions meet the criteria in Growth Plan policy 2.2.5.9 is required.

Settlement Area Boundary Expansion

MMAH staff note that the conceptual settlement area boundary expansion in Schedule Z1 is creating settlement areas that are not connected to the existing settlement area due to the Greenbelt Protected Countryside. MMAH staff note that this may result in new infrastructure, such as stormwater management facilities, in the Greenbelt. Any such infrastructure would be required to satisfy sections 3.2 and 4.2 of the Greenbelt Plan. If possible, the Region should provide continuous connections between areas proposed for expansion (i.e., lands between the Brampton Flying Club and Mayfield West) to avoid/ minimize impacts to the Greenbelt.

Engagement with Indigenous Communities

Please note that both the Growth Plan (policies 5.2.3.4 and 5.2.3.7) and PPS (policy 1.2.2) require planning authorities to coordinate planning matters with Indigenous communities. First Nations and Metis communities, whose interests may be impacted by planning decisions, are to be engaged to ensure that they have adequate opportunity to participate fully in the process. Should the Region adopt this draft ROPA, it is requested that information respecting any municipal engagement process be provided to MMAH, including any submissions.

We look forward to continuing to work with Peel Region staff on this draft ROPA. Should you have any questions regarding the above, or wish to discuss these comments in more detail, please do not hesitate to email me at Jennifer.Le@ontario.ca, or alternatively, you may contact Lorelea Tulloch, Senior Planner, by email at Lorelea.Tulloch@ontario.ca.

Sincerely,

<Originally Signed By>

Jennifer Le
Planner, Community Planning and Development (West)

cc. Adrian Smith, Chief Planner and Director
MTO
ENERGY
NDMNRF
MECP
OMAFRA
MHSTCI
MEDJCT

Appendix A – Additional Provincial Comments on Peel Region’s draft ROPA

Example – Text highlighted in grey are recommended additions to the proposed policy

Example – Text in red with strikethrough are recommended deletions to the proposed policy

Item No.	OP Section	Provincial Comment	Policy Reference	Requests for Additional Information and Recommended Policy Modifications
Climate System				
1.	2.4.2	This draft policy is recommended to be revised to include reference to active transportation to better align with the objectives of the PPS and Growth Plan in supporting and promoting a range of transportation options, including active transportation.	PPS 1.8.1 b) Growth Plan 2.2.1.4 d) i) and 4.2.10 b)	It is recommended that this draft policy be revised as follows: 2.4.2 To support the development of sustainable, low-carbon, compact, mixed-use, and <i>transit supportive</i> communities which reduce greenhouse gas emissions and support active transportation, <i>protect</i> natural systems, features and functions, and promote renewable energy, energy conservation and efficient design.
Stormwater Management System				
2.	2.6.20.7 d)	This draft policy is recommended to be revised to include identification of appropriate mitigation strategies, in addition to adaptation strategies, to better align with PPS and Growth Plan policies regarding the mitigations of risks to human health, safety, property and the environment through stormwater management planning.	Stormwater Management Planning and Design Manual PPS 1.6.6.7 d) Growth Plan 3.2.7	It is recommended that this policy be revised as follows: 2.6.20.7 d) examine the cumulative environmental impacts of stormwater from existing and planned <i>development</i> , including an assessment of how climate change and extreme weather events will exacerbate these impacts and the identification of appropriate mitigation and adaptation strategies;
3.	2.6.20.7 g)	To better align with the Growth Plan, this draft policy is recommended to include reference to identifying maintenance costs as part of calculating the full life cycle costs of stormwater infrastructure.	Growth Plan 3.2.7.1 g)	It is recommended that this policy be revised as follows: 2.6.20.7 g) identify the full life cycle costs of the stormwater <i>infrastructure</i> , including maintenance costs, and options to finance costs over the long-term; and

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Lake Simcoe				
4.	2.9	Since the area covered by the Lake Simcoe Protection Plan (“LSPP”) overlaps with the ORMCP, draft section 2.9 of the ROPA would benefit from clarity that if there is a conflict between the two provincial plans, the provision that gives the greatest protection to the ecological health of the Lake Simcoe watershed will prevail.	Lake Simcoe Protection Act	It is recommended than an additional policy be added to provide direction on the policies that would apply when there is conflict between the LSPP and the ORMCP.
Greenbelt Plans				
5.	2.11.10 and 2.11.16	Draft policy 2.11.10 a) refers to lawfully permitted uses in the context of residential uses, however, this specificity is indicated prior to a general statement made about lawfully existing uses in draft policy 2.11.16.	ORMCP 6(1)	It is recommended that the policy regarding lawfully permitted uses be moved from draft policy 2.11.16 to the ‘Policies’ section of draft policy section 2.11 and reflect the wording in the ORMCP 6(1).
6.	2.11.14 a)	“Key hydrologic features” is misspelled as “key hydrolic features”.	N/A	The spelling for “key hydrologic features” should be corrected.
7.	2.11.14 c)	The draft ROPA does not clearly identify that the Agricultural System, in particular the agricultural land base mapping, extends beyond the ORM Countryside area and can exist within the Natural Core and Natural Linkage designations.	ORMCP Introduction, 11(3)-(4) and 12(3)-(4)	It is recommended that the draft ROPA clearly establishes the Agricultural System across the ORMCP, which could be achieved by introducing the Agricultural System concept in the beginning of the ROPA or, similar to the Greenbelt Section 2.12, outline the Agricultural System within the ORMCP Section 2.11 of the ROPA.
8.	2.11.22	Draft policy 2.11.22 does not appear to reflect the ability for agricultural uses, other than associated buildings or structures, to continue in the minimum vegetation protection zone, but not in the feature itself.	ORMCP 22(2)6 and 26(5)	It is recommended that an additional policy be added to clarify that agricultural uses, other than associated buildings and structures, are permitted only with respect to land in the minimum vegetation protection zone and not in the feature itself.
9.	2.11.50 and 2.11.52	These draft policies provide that in the case of a conflict between the policies of the Official Plan and the ORMCP, the policies of the ORMCP shall apply to the extent that they are less restrictive.	ORMCP 33	These draft policies should be revised to clarify that in the case of a conflict with the Official Plan, the policies of the ORMCP prevail with respect to agricultural uses, mineral aggregate operations and wayside pits. Further, zoning by-

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				laws shall not be more restrictive than the ORMCP with respect to these matters. Alternatively, these policies can be removed and consolidated with policies 2.11.6 and 2.11.11 of the draft ROPA in accordance with section 33 of the ORMCP.
10.	2.11.51	The current draft policy does not appear to address the inability for small-scale commercial, industrial, and institutional uses to be established in the prime agricultural area of the ORMCP.	ORMCP 40(3) and 40(5)	It is recommended that the policy be revised to ensure that the appropriate non-agricultural use policies are reflected in ROPA.
11.	2.11.56	This draft policy is recommended to be revised to state “in accordance with the ORMCP” instead of “in accordance to the ORMCP”.	N/A	It is recommended that the draft policy be revised to the following: 2.11.56 ...in accordance to with the ORMCP.
12.	2.12.14.1	Within the Protected Countryside of the Greenbelt Plan, this draft policy encourages local municipalities to develop strategies to guide adequate provision of parkland, open space and trails.	Greenbelt Plan 3.3.3.2 and 3.3.3.3	It is recommended that this policy be revised or additional policies be added in the ROPA to better align with the language used in the Greenbelt Plan promoting the connectivity of the natural heritage system and when planning for parkland, open space and trails.
13.	2.12.12.1.1	This draft policy could be clarified by directing permitted uses in the Greenbelt Plan to be based on the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas.	Greenbelt Plan 3.1.3.1	It is recommended that the policy text be modified as follows: 2.12.12.1.1 ...and <i>on-farm diversified uses</i> within the <i>Prime Agricultural Area</i> of the Protected Countryside in accordance with provincial g Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas
14.	2.12.13.2.11	Draft policy 2.12.13.2.11 defers details regarding vegetation protection zone requirements and natural heritage evaluation and hydrologic evaluation requirements to the Greenbelt Plan.	Greenbelt Plan 3.2.5.4 and 3.2.5.5	It is recommended that additional subsections be added to this policy to include the vegetation protection zone requirements and natural heritage and hydrologic evaluation requirements in the ROPA, rather than deferring

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				to the Greenbelt Plan on these matters for clarity and ease of reference.
15.	Schedule X8	Schedule X8 proposes adjustments to Minor Urban Centre designations for Belfountain, Cataract, Cheltenham, Inglewood, Mono Mills and Terra Cotta. As contemplated by the Niagara Escarpment Planning and Development Act, a boundary amendment to the Minor Urban Centre would have to be considered during the review of the Niagara Escarpment Plan.	Niagara Escarpment Planning and Development Act	The boundaries of the Minor Urban Centre boundaries in Schedule X8 are to be consistent with the existing identified boundaries in the Niagara Escarpment Plan, as currently mapped.
16.	Schedule X9	The boundaries of land use designations under the ORMCP are shown in Schedule X9. Schedule X9 additionally identifies lands in black hatching, however this is not defined in the legend.	Oak Ridges Moraine Plan Land Use Designation Map	<p>The boundaries of the land use designation shown in Schedule X9 are to be mapped in accordance with the Oak Ridges Moraine Plan Land Use Designation Map.</p> <p>It is unclear what the black hatching symbolizes as it is not defined in the legend. It is recommended that the Region provide clarification on the intent of identifying lands in black hatching and how it conforms with the Oak Ridges Moraine Land Use Map.</p>
17.	Schedule X9	The southeastern portion of lands municipally known as 15731 Highway 50 is proposed to be amended from 'Countryside' to the 'Palgrave Estate Residential Community' in Schedule X9, which is consistent with the Oak Ridges Moraine Land Use Map of the ORMCP. These lands are located outside the black hatched area referenced in Comment #16.	Oak Ridges Moraine Plan Land Use Designation Map	It is recommended that the Region provide clarification on whether these lands are intended to be located outside of the black hatching.

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Greenlands System (Comments based on understanding that the Greenlands System applies to natural heritage features located outside of the Greenbelt Plan and Growth Plan NHS.)				
18.	2.14.7	This draft policy permits the continuation of agricultural uses within the Greenlands System, however, it is unclear if the full range of new agricultural uses (as well as agriculture-related and on-farm diversified uses, where permitted) and existing agriculture-related and on-farm diversified uses are permitted.	Growth Plan 4.2.2.3 b), 4.2.3.1 f) and 4.2.4.4 b)	It is recommended that further clarity be provided to ensure appropriate uses are permitted within the Region's Greenlands System.
19.	2.14.9	<p>As this policy relates to 4.3.2.10 of the Greenbelt Plan, it cannot supersede directions in other Provincial Plans. As such, the draft policy should identify that it applies within the Greenbelt Plan area in Peel Region.</p> <p>For clarity, it is also recommended that this draft policy be revised to identify whether Core Area woodlands subject to aggregate resource extraction use in the Rural System applies to woodlands within a licensed property or within an identified area of high potential.</p>	Growth Plan 4.3.2.10	<p>It is recommended that the policy be revised to the following:</p> <p>2.14.9 For the purposes of defining the Core Areas of the Greenlands System for mineral aggregate resource extraction uses within the Rural System of the Greenbelt Plan, define Core Area woodlands as all woodlands that are a minimum of 30 hectares in size and exclude as Core Area valley and stream corridors all valley and stream corridors that have a drainage area of less than 125 hectares, subject to policy 4.3.2.10 of the Greenbelt Plan.”</p>
20.	2.14.12	It is recommended the Region revise policies for natural heritage features and areas outside of the Natural Heritage System for the Growth Plan and the Greenbelt Plan Natural Heritage System to meet no negative impact requirements. This policy outlines criteria for permitted uses which is not consistent with PPS policy 2.1.5.	PPS 2.1.5	For conformity with PPS 2.1.5, it is recommended that the Region remove draft policy 2.3.2.8 b) in its entirety: “b) the policies of the area municipal official plan permitting the exceptions require demonstration that: i) there is no reasonable alternative location outside of the Core Area and the use, development or site alteration is directed away from the Core Area to the greatest extent possible; ii) if avoidance of the Core Area is not possible, the impact to the Core Area feature is minimized; and

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				<p>Page 8 of 11 iii) any impact to the Core Area or its functions is mitigated through restoration or enhancement to the greatest extent possible;</p> <p>and replace with “b) Development and site alteration shall not be permitted in natural features unless it has been demonstrated that there will be no negative impacts on the natural features</p>
21.	2.14.27 a)	Draft policy 2.14.27 a) identifies certain types of uses that are not considered as Core Area woodlands and significant woodlands/plantations, specifically those that are managed for the production of fruits, nuts, Christmas trees or nursery stock.	PPS 2.3.3.1 Guideline on Permitted Uses in Ontario’s Prime Agricultural Area, Pub 851	It is recommended that clarity be provided that agro-forestry uses are not considered or defined as Core woodlands and/or significant woodlands. 2.14.27 managed for production of fruits, nuts, Christmas tree, nursery stock, or other similar agro-forestry-type uses.
22.	2.3.2.5 (former)	This draft policy stating that local municipalities may define local core areas and policies in their Official Plans have been removed.	N/A	Clarification is needed to allow MMAH staff to understand why this policy has been removed from the draft ROPA.
23.	Schedule Z1 and Figure X5	Schedule Z1 and Figure X5 currently identify “Special Policy Areas” as areas where certain non-typical policies apply (e.g., Parkway Belt West Plan area). However, the term “Special Policy Area”, under section 3.1 (Natural Hazards) of the PPS refers to specific areas within communities which have historically existed in the floodplain and where site specific policies approved by NDMNRF and MMAH apply.	PPS 3.1	It is recommended that Schedule Z1 and Figure X5 be revised to reserve the term Special Policy Area for areas meeting the PPS definition.

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Agricultural System				
24.	3.3.13 a)	The draft ROPA includes consideration for both agriculture-related and on-farm diversified uses within the same policy. Although on-farm diversified uses are subject to size restrictions, agriculture-related uses do not have to be restricted in size.	PPS 2.3.3.1 Permitted Uses in Ontario's Prime Agricultural Area, Pub 851	The Region may want to consider an approach which achieves consistency with the Guideline on Permitted Uses in Ontario's Prime Agricultural Area. For example, a policy could be added to recognize that on-farm diversified uses will be limited in size (e.g. 1-hectare).
25.	3.3.13 b)	The Minimum Distance Separation ("MDS") Guidelines outlines that MDS setbacks will not be required for agriculture-related and on-farm diversified uses. It is generally recommended that agriculture-related uses not be subject to MDS, but it may be appropriate for certain types of on-farm diversified uses.	Minimum Distance Separation Formulae and Guidelines, Pub 853 Guideline #35	It is recommended that greater clarity be provided to this draft policy to ensure it is clear which uses will be subject to MDS, with considerations made to not restrict permitted uses.
26.	3.3.13	This draft policy indicates that official plan criteria for agriculture-related uses and on-farm diversified uses in the Prime Agricultural Area in the Town of Caledon will be based on guidelines developed by the Province or on municipal approaches. It should be noted that within the Greenbelt Plan, permitted uses will be permitted based on provincial Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas.	Greenbelt Plan 3.1.3	It is recommended that the draft policy be revised to indicate that permitted uses within the Greenbelt Plan Area will be based on the Guidelines on Permitted Uses in Ontario's Prime Agricultural Area, such as the following: 3.3.13. ...These criteria may be based on guidelines developed by the Province or on municipal approaches that achieve the same objectives. Within the Greenbelt Plan Area, permitted uses will be based on provincial Guidelines on Permitted Uses in Ontario's Prime Agricultural Area.
27.	3.3.16 a)	Draft policy 3.3.16 a) permits lot creation and lot adjustments in the Prime Agricultural Area for agricultural uses, provided that the lots are of an appropriate size.	PPS 2.3.4	It is recommended that the Region consider adding a minimum farm parcel size to address lot creation for agricultural uses.

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				Generally, OMAFRA recommends 40-hectares as an appropriate minimum farm parcel size, for the purposes of lot creation, for areas where field crops and livestock operations predominate. Including this minimum would ensure consistency, as 40-hectares is the parcel size established in the Greenbelt Plan.
28.	3.3.16 e)	Greenbelt policy must be reflected in lot creation policies to ensure appropriate implementation.	Greenbelt Plan 4.6	It is recommended that the policy be revised as follows: e) Within the Greenbelt Plan, consents to enable the securement of lands for natural heritage conservation purposes by a <i>public authority</i> or a <i>non-government conservation organization</i> , provided it does not create a separate lot for a residential dwelling in Prime Agricultural Areas.
29.	3.3.17	This draft policy provides a cross-reference to policy 3.2.5.12 c), however it does not appear that policy 3.2.5.12 c) is in the draft ROPA.	N/A	It is recommended that the Region update the policy reference.
30.	3.3.21.2	It appears that the applicability of the Agricultural System is focused on the Town of Caledon in the draft ROPA, however it should be noted that the agri-food network – a component of the Agricultural System – would extend beyond the municipal boundaries of Caledon and into other municipalities in the Region’s Urban System. The agri-food network includes elements important to the viability of the agri-food network, such as food processing and farmers’ markets.	PPS Definition of “Agri-Food Network” and “Agricultural Systems”	It is recommended that draft policies regarding the Agricultural System be broadened to include reference to other municipalities in the Region’s Urban System.
31.	3.4.14 h)	Aggregate activity is permitted as an interim use within prime agricultural areas.	PPS 2.4.4.1 and 2.5.4.1	This policy should be addressed so that it acknowledges the interim nature of aggregate activity.

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Cultural Heritage				
32.	Preamble 3.6, paragraph 4	The term “built heritage” is italicized in the preamble, indicating it is defined in the Official Plan’s glossary. The glossary and the PPS use the term “built heritage resources”, thus the preamble should be updated for consistency and clarity.	PPS Definition of “Built Heritage Resources”	It is recommended that this sentence be revised to the following for consistency with the ROP’s glossary and the PPS: 3.6 ...conservation and interpretation of <i>cultural heritage resources</i> , including but not limited to the <i>built heritage resources</i> , cultural heritage features, structures, archaeological resources, and <i>cultural heritage landscapes</i> in Peel...
Energy Resources				
33.	3.7.20	This draft policy is recommended to be revised to include reference to ground-mounted solar facilities in prime agricultural areas as on-farm diversified uses to better align with the PPS.	PPS 6.0 Definitions (<i>on-farm diversified uses</i>)	3.7.20. ...should be designed to minimize disturbance to agricultural soils and operations. Ground-mounted solar facilities are permitted in <i>prime agricultural areas</i> , including <i>specialty crop areas</i> , only as <i>on-farm diversified uses</i> .
34.	3.7.4, 3.7.23 and Schedule Z1	Draft policies 3.7.4 and 3.7.23 provide that the planned Northwest GTA Transmission Corridor is identified in Schedule Z1. Schedule Z1 identifies a Conceptual Strategic Infrastructure Study Area (“SISA”) which, according to section 5.7 of the ROP, illustrates the conceptual GTA West Transportation Corridor. MMAH staff note that the policies of section 5.7 on the SISA and the term “SISA” have been crossed out, and hence appear to have been removed from the ROP. It is unclear if the intent of the Conceptual SISA on Schedule Z1 is to continue to identify the conceptual GTA West Transportation Corridor, as previously provided for in former section 5.7, as	PPS 1.6.8.1 and 1.6.8.3 Growth Plan 3.2.5.1 b)	As section 5.7 on the Conceptual SISA appears to have been deleted from the ROP, MMAH staff have concerns that it may be unclear for readers to understand what the Conceptual SISA on Schedule Z1 is depicting. Both the GTA West Transportation Corridor and the Northwest GTA Transmission Corridor should be clearly identified on Schedule Z1. Should the intent of the Conceptual SISA on Schedule Z1 be to identify the conceptual GTA West Transportation Corridor and the Northwest GTA Transmission Corridor, it is recommended that the Region consider revising the term “Conceptual SISA” to reflect the names of the two planned corridors.

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		well as the conceptual Northwest GTA Transmission Corridor as indicated in draft policies 3.7.4 and 3.7.23.		
Land Needs Assessment				
35.	LNA	The features identified as designated greenfield area exclusions in the LNA generally conform to policy 2.2.7.3 of the Growth Plan. However, transportation rights-of-way such as the 'Ninth Line Transitway' may not be excluded from the designated greenfield area if they are not identified as a freeway in the Ontario Road Network (issued by Land Information Ontario).	Growth Plan 2.2.7.3	Lands not within the freeway corridor are not eligible to be excluded for the purpose of calculating the designated greenfield area density target. Therefore, it is recommended that the Region confirm if the specified transit ROW falls within the Highway 407 envelope.
36.	LNA	<p>It is not clear if the GTA West Transportation Corridor has been excluded from the existing settlement area in order to account for recent refinements to the study area. They do not appear to be mapped or otherwise accounted for across all of the LNA materials submitted to MMAH.</p> <p>The Region proposes to exclude 339 hectares from the designated greenfield area on account of the lands being within the GTA West Transportation Corridor study area. Policy 2.2.7.3 specifies that only freeways may be excluded for the purposes of defining the designated greenfield area. The GTA West Transportation Corridor is not yet mapped in the Ontario Road Network and therefore may not be excluded on that basis.</p>	Growth Plan 2.2.7.3	The GTA West Transportation Corridor is not a freeway as part of the Ontario Road Network at this time and therefore the lands cannot be excluded on this basis. The Region may consider conducting further analysis as part of the LNA, and provide additional documentation for review by the Ministry, to account for any lands that could be identified as 'undevelopable' to 2051 as per the LNA methodology.

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Settlement Areas and Built-Up Areas				
37.	5.3.1, 5.4.1 and 5.4.10	Draft policy 5.3.1 does not specify that growth is to be directed to settlement areas that have a delineated built boundary, whereas draft policies 5.4.1 and 5.4.10 direct growth to the delineated built-up area.	Growth Plan 2.2.1.2 a) and 2.2.1.2 f)	<p>For additional clarity and consistency, it is recommended that draft policy 5.3.1 include reference to growth being directed to settlement areas that have a delineated built boundary as follows:</p> <p>5.3.1 Direct the majority of new population and employment growth to the Urban System, being lands within the <i>Delineated Built-Up Areas</i>, with a focus on <i>Strategic Growth Areas</i> and other areas that leverage existing and planned <i>infrastructure</i> investments.</p>
38.	5.4.12	<p>This draft policy prohibits the establishment of new settlement areas outside of a municipal comprehensive review.</p> <p>It should be noted that the creation of new settlement areas is prohibited under Growth Plan policy 2.2.1.2 f). Where it is demonstrated, through an LNA, that there is insufficient land to accommodate forecasted growth to 2051, the feasibility and most appropriate location for a settlement area boundary expansion will be identified in accordance with Growth Plan policy 2.2.8.3.</p>	Growth Plan 2.2.1.2 f) and 2.2.8	<p>It is recommended that the policy be revised to remove reference to “outside of a municipal comprehensive review”, to the following:</p> <p>5.4.12 Prohibit the establishment of new <i>settlement areas</i> outside of a municipal comprehensive review.</p>
39.	Preamble 5.4.17, Paragraph 1	The preamble for draft section 5.4.17 notes that the Growth Plan requires a minimum of 40% of all residential development occurring annually in Peel to be within the built-up area by the year 2015 and for each year thereafter. MMAH staff would like to note that this provision was provided in the Growth Plan, 2006, whereas the Growth Plan, 2019	Growth Plan 2.2.2.1 a)	It is recommended that the 40% intensification target identified in the preamble be revised to 50% to reflect the intensification target provided in the Growth Plan.

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		requires a minimum of 50% by the time the next municipal comprehensive review is approved and in effect, and for each year thereafter.		
40.	5.4.17.6, 5.6.17.7, 5.6.17.12 and Schedule Z2	<p>Draft policy 5.4.17.6 requires local municipalities to delineate and establish minimum density targets for Strategic Growth Areas (“SGAs”), which may include Urban Growth Centres (“UGCs”), MTSAs, Nodes/Centres and Intensification Corridors. Additionally, draft policy 5.6.17.7 requires lower-tier municipalities to delineate and establish minimum density targets for Strategic Growth Areas identified on Schedule Z2 of the ROP.</p> <p>While delineations and density targets have been established for UGCs and MTSAs, Nodes/Centres and Intensification Corridors do not appear to be delineated nor have a density target in the draft ROPA.</p>	Growth Plan 5.2.5.3 d) and 5.2.5.5 a)	<p>Should minimum density targets be established for strategic growth areas to which targets and delineations are not required under the Growth Plan, they must first be established in the Region’s official plan, along with delineations. To implement the minimum density targets applicable to the delineated areas, lower-tier municipalities would then undertake more detailed planning, such as secondary plans, to establish permitted uses and identify densities, heights and other elements of site design.</p> <p>Where the Region has not delineated nor established a minimum density target for a strategic growth area, lower-tier municipalities are able to delineate boundaries and undertake more detailed planning work, although minimum density targets cannot be established.</p> <p>It is recommended that the Region remove policies in the draft ROPA which allow lower-tier municipalities to delineate and set minimum density targets for strategic growth areas ahead of the Region.</p>
41.	5.6.20.13.16.6 and 5.6.20.13.14 a)	These draft policies include references to planning to the 2031 planning horizon.	Growth Plan 1.2.3	These draft policies should be revised to identify the 2051 planning horizon of the Growth Plan.
42.	Schedule Z1 and 5.6.20.13.14	Draft section 5.6.20.13.14 provides that the need and most appropriate location for a settlement area boundary expansion will be studied and considered for lands in Mayfield West and Bolton, identified in Schedule Z1 as being lands within the ‘Study Area	Growth Plan 2.2.8.3	While it is understood that at this time the settlement area boundary expansion is still conceptual, and hence subject to change, clarification is required to understand whether the final settlement area boundary expansion will continue to identify those lands as being within the ‘Study Area

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		<p>Boundary' and 'Areas Assessed in the Bolton Residential Expansion Study' respectively.</p> <p>Schedule Z1 identifies lands that are within the conceptual settlement area boundary expansion for Mayfield West and Bolton in the 'Study Area Boundary' and 'Areas Assessed in the Bolton Residential Expansion Study'</p>		<p>Boundary' and 'Areas Assessed in the Bolton Residential Expansion Study' for Mayfield West and Bolton, respectively.</p>
43.	Schedules Z2 and Z3	It appears that the Village of Caledon delineated built-up area is not identified or delineated on Schedules Z2 and Z3.	Growth Plan 5.2.5.3	The Village of Caledon is to be identified and delineated as a Delineated Built-up Area as appropriate.
Major Transit Station Areas				
44.	5.6.19.9	<p>This draft policy directs local municipalities to establish policies in their official plan and other implementation documents for each MTSA delineated on Schedule Y7 of the ROP, in accordance with criteria set out in draft policy 5.6.19.9. MMAH staff understand that the delineated MTSA's (i.e., 'primary' and 'secondary' MTSA's), for which density targets have been established in the draft ROPA, are being advanced under the <i>Planning Act</i> Protected MTSA framework.</p> <p>Subsection 16(16) of the Planning Act outlines requirements for policies to be included in an upper-tier official plan, including the identification of the minimum number of residents and jobs combined per hectare that are planned to be accommodated within the area, and the requirement that the official plans of relevant lower-tier municipalities include policies that:</p>	Planning Act 16(16)(b)	Currently, this draft policy appears to direct local municipalities to establish policies setting out the land uses and minimum densities that would apply to the entire MTSA. It is recommended that draft policy 5.6.19.9 be revised to provide more specificity directing the lower-tiers to establish policies which speak to the authorized uses and minimum densities at a more granular scale, specifically with respect to the buildings and structures on lands in the area, in accordance with subsection 16(16)(b) of the <i>Planning Act</i> .

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		<ul style="list-style-type: none"> identify the authorized uses of land in the area and of buildings or structures on lands in the area; and identify the minimum densities that are authorized with respect to buildings and structures on lands in the area. <p>The Region, as the approval authority for lower-tier official plan PMTSA policies, would want to ensure that it is clear in the ROP that lower-tier municipalities are to establish policies which identify the authorized uses and minimum densities with respect to the buildings and structures on lands in the area, in accordance with subsection 16(16)(b) of the <i>Planning Act</i>.</p>		
Regional Structure – Designated Greenfield Areas				
45.	5.6.20.4 and 5.6.20.14.3	<p>The term “built heritage” is italicized, indicating it is defined in the Official Plan’s glossary and the PPS use the term “built heritage resources”, thus the draft policies should be updated for consistency and clarity.</p> <p>The term “archaeological resources” should be italicized, as it is a defined term in the glossary and in the PPS.</p> <p>Further, the term “cultural heritage resources” should be revised to “cultural heritage landscapes” as it is a defined term in the PPS.</p>	PPS Definition of “Built Heritage Resources”, “Archaeological Resources”, and “Cultural Heritage Landscapes”	<p>It is recommended that draft policies 5.6.20.4 and 5.6.20.14.3 be revised to use terms that are consistent with the PPS, such as the following:</p> <p>5.6.20.4 To ensure that planning for <i>Designated Greenfield Areas</i> is undertaken in a manner that provides direction for a natural heritage and water resource management system, and recognizes the importance of protecting and conserving the archaeological resources <i>archaeological resources, cultural heritage landscapes resources, built heritage resources</i> and agricultural resources of Peel.</p> <p>5.6.20.14.3 To ensure that planning for 2051 New Community Areas is undertaken in a manner that provides for the robust protection and management of natural</p>

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				heritage and water resources, and recognizes the importance of conserving and enriching the <i>cultural heritage landscapes resources</i> , <i>archaeological resources</i> and <i>built heritage resources</i> and agricultural resources of Peel.
46.	5.6.20.13.16.10 and 5.6.20.13.17	These policies provide that for lands within the Ninth Line Lands and Mayfield West Phase 2 Settlement Area, development will not predetermine or preclude the planning and/or implementation of the GTA West Transportation Corridor.	PPS 1.6.8.1 and 1.6.8.3 Growth Plan 3.2.5.1 b)	<p>The PPS and Growth Plan state that planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including for electricity generation facilities and transmission systems. Development shall not be permitted in planned corridors that could preclude or negatively affect the use of the corridor for the purposes for which it was identified.</p> <p>These policies are recommended to be revised to include reference to the Northwest GTA Transmission Corridor Study in order to be consistent with the provincial policies regarding planning and protecting for planned transportation and infrastructure corridors.</p>
47.	5.7.18.1 and 5.7.19.1	<p>These draft policies use the term “cultural attributes” which is undefined, but appear to have a proximal relationship to the term “heritage attribute” which is a defined term in the glossary. MMAH staff have concerns that this may cause issues with interpretation.</p> <p>It is recommended that the draft policies are updated to refer to the character of rural lands more generally, as well as cultural heritage resources. This will help clarify that the policies are not only referring to heritage conservation, but that it is one option for protecting rural character.</p>	PPS Definition of “Heritage Attributes”	<p>It is recommended that the draft policies be revised to the following:</p> <p>5.7.18.1 To protect and enhance the distinct character, cultural-attributes and historical-heritage of <i>Rural Settlement Areas</i>, including the conservation of <i>cultural heritage resources</i>.</p> <p>5.7.19.1 To protect and enhance the distinct character, cultural-attributes and historical-heritage of <i>Rural Lands</i>, including the conservation of <i>cultural heritage resources</i>.</p>

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Regional Structure – Rural System				
48.	Preamble 5.7.19	The preamble states that rural lands contain existing agricultural uses. MMAH staff would like to note that existing, as well as new, uses are permitted on rural lands.	PPS 1.1.5.2 d)	It is recommended that the preamble be revised to indicate that new agricultural uses are also permitted in order to be consistent with the PPS. The preamble is recommended to be revised to the following: <i>Rural Lands</i> contain existing, and support new, agricultural operations and provide...
49.	Schedule X12	A portion of rural settlements Victoria and Tullamore are shown as being part of the Urban System and the Designated Greenfield Area on Schedules Z1 and Z3, respectively. However, Schedule X12 continues to identify Victoria and Tullamore as rural settlements.	N/A	Should it be the Region's intent to identify certain lands in Victoria and Tullamore as being part of the Urban System, it is recommended that the Region consider revising Schedule X12 such that those lands are no longer identified as rural settlements and in the Urban System.
Regional Structure – Employment Areas				
50.	Preamble 5.8, Paragraph 1	The first paragraph in the preamble to draft section 5.8 references achieving employment forecasts by the 2041 planning horizon.	Growth Plan 1.2.3	It is recommended that the preamble be revised to identify a 2051 planning horizon.
51.	Section 5.8	Although the draft ROP makes several references to “protecting” employment areas, it does not fully satisfy the requirement that the development of sensitive land uses will avoid, minimize or mitigate adverse impacts on industrial and other land uses that are vulnerable to encroachment.	Growth Plan 2.2.5.8	It is recommended that policy direction be provided to state the importance of ensuring the long-term viability of employment areas more clearly by avoiding, minimizing or mitigating the adverse impacts of residential development and other sensitive land uses on employment areas.
52.	5.8.21	This draft policy provides direction on protecting existing and future employment areas to meet long-term market demands and locational requirements of diverse employment sectors and uses.	PPS 1.3.2.6 Growth Plan 2.2.5.5	It is recommended that the draft policy be revised as follows: 5.8.21 Protect existing and future <i>Employment Areas</i> to meet the long-term market demands and locational

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		It is recommended that this draft policy expand on the locational requirements to include reference to protecting employment areas adjacent to or near major goods movement facilities and corridors to better align with the PPS and Growth Plan.		requirements of a diverse range of employment sectors and uses, including <i>Employment Areas</i> in adjacent and proximity to major goods movement facilities and corridors.”
53.	5.8.30	The draft policy specifies that major retail, residential and other non-ancillary uses are not considered employment uses, “unless already permitted”. Under the Growth Plan, residential and major retail uses, or major retail uses that are permitted but exceed an established size or scale threshold, are not permitted in employment areas.	Growth Plan 2.2.5.7 a)	It is recommended that reference to major retail, residential and non-ancillary uses be removed. If major retail uses are permitted, it is recommended that the draft policy be expanded to establish a size and/or scale threshold for permitted major retail uses and prohibit any major retail use in employment areas that would exceed the threshold.
54.	5.8.31 and 5.8.35	These policies make reference to retail and commercial uses, however do not appear to expressly prohibit major retail uses in employment areas nor specify the size of permitted major retail uses. The Growth Plan requires that major retail uses exceeding an established size or scale threshold for major retail uses be prohibited from employment areas.	Growth Plan 2.2.5.7 b)	For clarity, it is recommended that the draft policies be expanded to establish a size and/or scale threshold for permitted major retail uses and prohibit any major retail use in employment areas that would exceed the threshold.
55.	5.8.32	<p>This draft policy provides that employment areas within delineated MTSAAs shown on Schedule Y6 may permit retail, residential, commercial, and non-ancillary uses without an amendment to the ROP. It appears that these employment areas are within Provincially Significant Employment Zones (“PSEZ”).</p> <p>PSEZs are areas that consist of both employment areas and mixed-use areas that contain a significant number of jobs. PSEZs do not confer</p>	Growth Plan 2.2.5.7, 2.2.5.9, 2.2.5.10 and definition of “Provincially Significant Employment Zones”	It is unclear how this draft policy conforms to policy 2.2.5.7 of the Growth Plan with respect to prohibiting residential uses in employment areas. Should the Region seek to permit residential uses as described in draft policy 5.8.32 of the draft ROPA, an employment conversion would be required in accordance with Growth Plan policy 2.2.5.9 if undertaken as part of the MCR; or Growth Plan policy 2.2.5.10 if undertaken prior to an MCR.

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		land use designations, however are instead intended to protect employment areas from conversion without provincial approval, unless the employment area is located within a MTSA. Under the Growth Plan, residential and major retail uses, or major retail uses that are permitted but exceed an established size or scale threshold, are not permitted in employment areas.		
56.	5.8.37 and 5.8.39	In planning for employment, no reference is made to minimizing surface parking. It is recommended that draft policies 5.8.37 and 5.8.39 be revised to encourage new developments to minimize the amount of surface parking in order to better align with the Growth Plan.	Growth Plan 2.2.5.4	<p>The draft policies may be revised to the following:</p> <p>5.8.37 Encourage new <i>development</i> in existing office parks that enhances transit and <i>active transportation</i> connectivity and provides for an appropriate mix of amenities and open space. In planning for employment, surface parking will be minimized.</p> <p>5.8.30 <i>Employment Areas</i> shall be planned and designed to minimize surface parking and be easily accessible by a range of transportation modes including transit and <i>active transportation</i>.</p>
57.	Schedule Y6	According to the Region's Land Needs Assessment Report to the Planning and Growth Management Committee meeting on June 17, 2021, the Region is supporting the conversion of 273.4 hectares of employment lands to non-employment uses. It appears that the lands supported for employment conversion are identified on Schedule Y6 as converted lands.	Growth Plan 2.2.5.9	<p>Growth Plan policy 2.2.5.9 states that employment conversions are permitted through a municipal comprehensive review, subject to criteria in policy 2.2.5.9 being met. It appears that lands supported for employment conversion identified as B8, M1 and M3 of the Region's Land Needs Assessment Report do not meet all the criteria outlined in policy 2.2.5.9.</p> <p>Further, the Region's Land Needs Assessment Report identifies, at a very high level, whether and how each of the proposed employment land conversions meets the</p>

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				criteria in Growth Plan policy 2.2.5.9. It is recommended that the Region provide more fulsome and detailed rationale to better allow MMAH staff understand how policy 2.2.5.9 is being satisfied.
58.	Schedule Y6	<p>The Heritage Heights Employment Area (west side of Brampton) is not designated and has no boundary but is marked as “to be planned” through the Heritage Heights Secondary Plan.</p> <p>Per Growth Plan policy 2.2.5.6, upper-and single-tier municipalities are required to designate all employment areas in official plans and protect them for appropriate employment uses over the long-term.</p>	Growth Plan 2.2.5.6	It is recommended that the Heritage Heights Employment Area be identified on Schedule Y6 and accounted for as part of assessing land needs to 2051.
Housing				
59.	5.9.16 a)	This draft policy speaks to maintaining the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and lands which are designated and available for residential development.	PPS 1.4.1	<p>It is recommended that the conditional “if necessary” be added to align with the PPS:</p> <p>5.9.16 maintain at all times the ability to accommodate residential growth a minimum of 15 years through residential <i>intensification and redevelopment</i> and, <i>if necessary</i>, lands which are designated and available for residential <i>development</i>; and</p>
Transportation Systems				
60.	5.10	The draft ROPA prioritizes and promotes the development of a sustainable, multi-modal transportation system that facilitates the movement of movement of people and goods in a safe and efficient manner, rather than the movement of single occupancy vehicles. This has the effect of placing transportation via private vehicles (other	Growth Plan 3.2.3.1	<p>To better align with the Growth Plan, it is recommended that the Region consider adding a new objective:</p> <p>5.10.9 To ensure that public transit will be the first priority for transportation infrastructure planning and major transportation investments.</p>

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		<p>than single occupancy) at the same priority level as public transit.</p> <p>The Growth Plan requires that public public transit be the first priority for transportation infrastructure planning and major transportation investments.</p>		
61.	5.10.2	<p>This draft objective seeks to promote sustainable modes of transportation, barrier (environmental or physical) free mobility, and improved mobility choices for people of all ages and abilities.</p> <p>According to Growth Plan policy 2.2.1.4 b), complete communities support and offer opportunities for people of all ages, abilities and incomes. To better align with the Growth Plan, it is recommended that the Region consider income as part of transportation equity.</p>	Growth Plan 2.2.1.4 b)	<p>It is recommended that the Region consider the following:</p> <p>5.10.2 To promote <i>sustainable</i> modes of transportation, barrier (environmental or physical) free mobility, and improved mobility choices for people of all ages, and abilities and income.</p>
62.	5.10.22	<p>Draft policy 5.10.22 provides for the pursuit of improved connections to the Toronto Pearson International Airport from the GTHA, and particularly from Peel Region. It is recommended that the Region consider revising the draft policy to include reference to the planned Toronto Pearson Airport Connection from Renforth station.</p>	PPS 1.6.8.1	<p>It is recommended that the draft policy be revised as follows:</p> <p>5.10.22 Pursue, in cooperation with the appropriate agencies, the improvement of connections to Toronto Pearson International Airport from all parts of the <i>GTHA</i> and particularly from Peel, including the planned connection of the Eglinton Crosstown West Expansion (ECWE) from Renforth Station to Pearson International Airport.</p>
63.	5.10.32.22	<p>This draft policy references the implementation and regular updating of the Peel Region Sustainable Transportation Strategy, which builds on local municipal pedestrian and cycling plans.</p>	Province-wide Cycling Network, 2018	<p>It is recommended that the policy be revised to the following:</p>

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		The Region should consider making reference to the Province-wide Cycling Network in draft policy 5.10.32.22 in order to support the improvement of interjurisdictional connectivity and intergovernmental collaboration on active transportation	PPS 1.6.7.3 Growth Plan 3.2.3.4	5.10.32.22 Work with the Province, the local municipalities, adjacent municipalities and stakeholders to implement and regularly update the Sustainable Transportation Strategy for Peel that builds on local municipal pedestrian and cycling plans, and cross jurisdictional networks such as the Province-wide Cycling Network identified in 2018.
64.	5.10.32.36 g)	This draft policy references the “Eglinton Crosstown West LRT Extension”, which does not reflect the project’s name in public documents.	N/A	It is recommended that the policy be revised to the following: 5.10.32.36 g) implement the Eglinton Crosstown West LRT Extension from Mount Dennis Station to Renforth Station, and further to Toronto Pearson International Airport; and
65.	5.10.32.41	The draft ROPA does not appear to contain a policy speaking to transit service integration within and across municipal boundaries. Given Peel’s vast and complicated transit network, it is recommended that the ROP include a new sub-policy to support transit service integration within and across municipal boundaries.	Growth Plan 3.2.3.3	It is recommended that the Region add the following policy: 5.10.32.41 e) supporting transit service integration within and across municipal boundaries
66.	Preamble 5.10.33, Paragraph 2	The preamble states that the Conceptual GTA West Transportation Corridor and the Northwest GTA Transmission Corridor are shown on Schedule Y2, whereas MMAH staff note that the legend and annotation in Schedule Y2 only identify the Conceptual GTA Transportation Corridor.	PPS 1.6.8.1 and 1.6.8.3 Growth Plan 3.2.5.1 b)	It is recommended that Schedule Y2 be revised to clearly identify both the Conceptual GTA West Transportation Corridor and the Northwest GTA Transmission Corridor.
Glossary				
67.	Glossary	The draft ROPA’s definition of <i>significant</i> needs clarification to ensure that NDMNRF’s criteria for identifying woodlands and other features and area are met.	NDMNRF’s 2012 Technical Paper on the identification and	It is recommended that the following concluding sentences be added:

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			delineation of key natural heritage features in the Greenbelt Natural Heritage System	<p>b) in regard to woodlands... The Province (Ministry of Northern Development, Mines, Natural Resources and Forestry) identifies criteria related to the foregoing.</p> <p>d) in regard to other features and areas... The Province (Ministry of Northern Development, Mines, Natural Resources and Forestry) identifies criteria related to the foregoing.</p> <p>This should be followed with an overall conclusion that:</p> <p>While some significant resources may already be identified and inventoried by official sources, the significance of others can only be determined after evaluation.</p>
68.	Glossary	The draft ROPA's definition of <i>planned corridors</i> is recommended to be revised to include reference to ministries and entities mentioned in the PPS and Growth Plan definition of "planned corridors".	PPS and Growth Plan Definition of "Planned Corridors"	<p>It is recommended that the definition be revised as follows in order to align with the PPS and Growth Plan:</p> <p>Planned Corridors: Corridors or future corridors which are required to meeting projected needs, and are identified through provincial plans or preferred alignment(s) determined through the Environmental Assessment Act process or identified through planning studies where the Ontario Ministry of Transportation, Metrolinx, Ontario Ministry of Energy, Northern Development and Mines or Independent Electricity System Operator (IESO) or any successor to those ministries or entities is actively pursuing the identification of a corridor.</p>