

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
No.	Chapter Subsection/ Policy No./Definition/Map No.	Staff Comment
Chapter 1		
1.	1.2	The reference to the long title of the Growth Plan in the preamble should be changed to "A Place to Grow: Growth Plan for the Greater Golden Horseshoe".
Chapter 2		
2.	Chapter 2	Consider speaking to all the pillars of sustainability (i.e., environmental, social and fiscal) in the objectives and policies in this chapter, which currently emphasize fiscal sustainability. The need for partnerships with various sectors (e.g., development, non-profit, agencies, etc.) should also be considered.
3.	Chapter 2	Per Recommendation 3 of the Supplementary Report with City of Markham Comments on York Region's Growth Forecast and Land Needs Assessment to 2051 , which was endorsed by DSC on October 18, 2021, that any whitebelt lands in Markham that are not needed to accommodate 2051 growth not be designated as "Future Urban Area", but rather maintain a non-urban (agriculture or similar) designation in the Regional Official Plan and Markham Official Plan.
4.	2.1.5	For a) Natural Core Areas, clarify why the Oak Ridges Moraine is mentioned but not the layers in the Greenbelt outside the Oak Ridges Moraine. For c) Protected Countryside Area, lands in the Greenbelt are separate from the Oak Ridges Moraine. Oak Ridges Moraine countryside lands that are prime agricultural should be added to the list separately.
5.	2.2.3	Clarify if "financial" is covered by "infrastructure planning".
6.	2.2.4	Consider deleting "agile approach to growth management by ensuring" to streamline this policy.
7.	2.2.5 d)	Clarify if equal priority should be given to both roads and transit, or if priority should be given to transit per the phrase "prioritize existing investments that enhance the existing transportation network...".
8.	2.2.7 and 2.2.8	Clarify the intent of policy 2.2.7, specifically what type of coordination is needed.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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9.	2.2.8	For a) clarify the intent of this policy regarding a comprehensive, integrated and collaborative planning process (i.e., what is needed and what is it intended to achieve?). For b) clarify what the anticipated outcome/deliverable of this policy is. What changes can the local municipality expect from the Region with respect to infrastructure delivery once a municipality has provided the Region early identification of regional capital infrastructure requirements?
10.	2.2.11	Clarify how this policy will or should be implemented.
11.	2.2.12	The word 'shall' appears to be a mandate. It is not always possible for a local municipality to phase development in accordance with this policy, specifically when development and/or growth is driven by the Province through the use of MZO's, or by other initiatives to bring innovation or world class facilities to showcase a municipality. Revise the wording of this policy to reflect this by adding ", where appropriate" after "Regional plans".
12.	2.2.13	Clarify what "near term development priorities" means.
13.	2.2.17	Clarify if the intent of this policy is to reduce financial risk, or to be financially sustainable.
14.	2.3.1	Revise this policy to include the characteristics of a complete community (i.e., mix of uses, amenities and services, compact, accessible, etc.) as "walkable to most local amenities" does not sufficiently describe a complete community.
15.	2.3.13	The use of "employ" from the former policy or even "apply" is preferred instead of "shall be". Also, overall the criteria are too detailed, some with outcomes, some without. For a) and b) would this work better in preamble? For d) is "community greening" a new term? And for i) odd/inconsistent that the phrase "that support physical activity and social interactions" (i.e. the purpose/end) is provided in this instance, but not in others above.
16.	2.3.15	Clarify how local municipalities would demonstrate conformity with this 'shall' policy other than repeating the policy in local official plans? That is, will the Region be looking for specific mechanisms for neighbourhood retrofits such as through asset management plans or community improvement? Consider adding a text box in the margin outlining optional mechanisms to support implementation of this policy.
17.	2.3.1.4	Consider adding "corporate stakeholder" to this policy, or clarify if this is being addressed somewhere else outside of the ROP. A greenhouse gas emissions strategy will include partnerships with corporations.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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18.	2.3.1.5	Amend policy 2.3.1.5 by or add a new policy to encourage area-specific community energy plans to be developed for secondary plans and major development.
19.	2.3.1.6	Amend policy 2.3.1.6 to add “carbon budget framework” to the list of tools.
20.	2.3.1.9	Clarify if the studies are required for local municipalities, or if they are only for the Region's evaluation.
21.	2.3.1.16	Clarify why there is no longer a focus on solar energy, and why a solar design strategy is no longer needed (former policy 5.2.26).
22.	2.3.1.17	Clarify if this new policy is in the correct section.
23.	2.3.2.1	What is meant by market housing? Should ownership housing be identified as well as purpose-built rental housing? What does “income spectrum” mean and should it be a defined term?
24.	2.3.2.2 and 2.3.2.3	Draft policy 4.4.2.9 j in relation to Regional Corridors and Major Transit Station Areas refers to affordable housing targets whereas draft policies 2.3.2.2 and 2.3.2.3 state that a minimum of 35% be affordable. Regional staff should harmonize these policies so that they refer to targets. This would also align with the rental housing targets terminology used in draft policy 2.2.2.4 and Table 2. Staff support the intent of these policies to increase the supply of affordable housing, although it is not clear how the targets can be achieved. Affordable housing targets have not been met from 2018 to 2020 (2021 data is not yet available) and should be further reviewed in consultation with local municipalities. Regional programs and incentives are requested to support implementation of these targets.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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25.	2.3.2.4	The Growth Plan introduced a requirement for municipalities to include rental housing targets and the draft ROP proposes purpose-built rental targets for each municipality. Markham has the highest target of all York Region local municipalities with 10,000 units by 2051. According to York Region's Regional Official Plan Update Policy Directions Report (June 10, 2021) these rental targets are proportionate to population forecasts. While there is some concern by staff whether the rental target is achievable, it is recommended that York Region provide implementation support through new programs and incentives. Further, given that the Growth Plan speaks to rental targets and not specifically purpose-built rental units, staff recommend that the target contained in the draft ROP be clarified or defined to include additional residential units ("secondary suites").
26.	2.3.3	Clarify what kind of infrastructure is being referred to in the objective.
27.	2.3.3.4	Clarify what is meant by balance, and how it will be measured.
28.	2.3.3.6	This policy seems to be the same as 2.3.5.5. Consider combining them.
29.	2.3.3.8	This updated policy does not capture the tourism related intentions of the former policies.
30.	2.4	From an Accessibility perspective the use of white text on coloured photographs/illustrations throughout the document is quite difficult to read. (Banner image) A photo of cemetery headstones is not the most appropriate representation of cultural heritage resources. A photo celebrating retention and incorporation of a heritage building would be more fitting.
31.	2.4.1	The word 'conserved' needs to be highlighted as it is a defined term. The policy would read better if it incorporated part of policy 2.4.2 (which is somewhat repetitive of this policy) "...shall be conserved to foster a sense of place, support heritage character, and benefit communities".
32.	2.4.2	This policy is somewhat vague and confusing. It could be better worded to reflect the desire to see cultural heritage resources incorporated in new development. For example: "To promote the retention and incorporation of cultural heritage resources in new development through well-designed built form and appropriate cultural heritage planning."

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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33.	2.4.3	The word “conserved” needs to be highlighted as it is a defined term.
34.	2.4.4	The words “conserved” and “cultural heritage resources” need to be highlighted as they are defined terms.
35.	2.4.5	A number of words need to be highlighted as they are defined: “conserve”, “built heritage resources”, “cultural heritage landscapes”, “heritage attributes”, “protected heritage property” (also the definition of adjacent lands needs to be corrected to make reference to cultural heritage resources). This policy would be more impactful if the word “and” was added as there are two different concepts here: 1) conserving the actual heritage resource on its property and 2) ensuring adjacent development does not negatively impact the heritage resource. Suggested edit: 2.4.5 To require local municipalities to adopt official plan policies to conserve cultural heritage resources, including significant built heritage resources and significant cultural heritage landscapes, and to ensure that development and site alteration on adjacent lands to protected heritage properties will conserve the heritage attributes of the protected heritage property.
36.	Text box between 2.4.5 and 2.4.6	One paragraph has a repetition that should be addressed. Suggested edit: “European settlers began arriving in the late 1600s and 1700s (including French, Pennsylvania Germans, United Empire Loyalists and Quakers). In 1792, Lieutenant Governor John Graves Simcoe established the original limits of York County. The Region’s early pattern of community development was influenced by the river and trail systems which followed ancient Aboriginal settlement patterns”
37.	2.4.6	Clarify what the term “integrating identified cultural heritage landscapes into official plans” means. “Cultural heritage landscapes” is a defined term and should be highlighted if the policy is maintained.
38.	2.4.8 and 2.4.9	The word “conserved” needs to be highlighted as it is a defined term.
39.	2.4.12	Expand the recognition and celebration to heritage site. Suggested edit: “To recognize and celebrate the rich cultural heritage of the Region’s ethnic and cultural groups, as well as the commemoration and interpretation of cultural heritage resources.”

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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40.	New policies	Recommend adding four (4) new policies inserted or grouped where appropriate in the existing policy list: Policy 2.4.X "To promote the identification of cultural heritage resources in local municipalities through a process of inventory, survey, research and evaluation, as a basis for the wise management and protection of these resources". Policy 2.4.X "To encourage local municipalities to create and support municipal heritage committee as per the Ontario Heritage Act to assist local councils in identifying, evaluating, conserving, interpreting and celebrating local cultural heritage resources". Policy 2.4.X To encourage York Region and local municipalities to consider fiscal tools, incentives and financial assistance programs, where appropriate, to help conserve cultural heritage resources". (this one could be combined with existing policy 2.4.9 by including community improvement plans and programs in the above policy revision) Policy 2.4.X "To support and encourage the use of secondary plans, zoning by-laws, subdivision and site plan control agreements, signage by-laws, and other municipal controls, to ensure that development that directly affects cultural heritage resources and adjacent lands, is designed, sited or regulated so as to protect and mitigate any negative visual and physical impact on the heritage attributes of the resource, including considerations such as scale, massing, height , building orientation and location relative to the resource."

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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41.	2.4.1.1	“Development” should be highlighted as it is a defined term. Policy ‘b’ and ‘d’ appear to conflict as both deal with the treatment of Indigenous significant archaeological resources but ‘b’ indicates the archaeologist shall engage (when resources are to be retained on site) and ‘d’ indicates that the archaeologist should engage (when on-site preservation is not possible). Seems both should either be shall or should as they both deal with significant resources. It may be better to remove all of the policies regarding Indigenous engagement (b to e) and just indicate “That where Indigenous significant archaeological resources are identified, the consulting archaeologist shall follow any provincial requirements regarding the engagement of Indigenous communities.” The consulting archaeologist has statutory responsibilities and should be left to fulfill these obligations.
42.	2.4.1.7	This policy should be amended to allow local municipalities to scope or further refine how they wish certain types of development to address the archaeological assessment requirements. The current wording would require an assessment for any project requiring approval under the Planning Act. In Markham, Site Plan Approval is used for all our heritage conservation district properties (20 square metres and larger and other small projects/alterations). This policy would trigger an archaeological assessment in every case since the Region’s archaeological Management Plan (and Archaeological Potential Mapping) indicates that all heritage conservation districts possess archaeological potential. Suggested edit: 2.4.1.7 That the York Region Archaeological Management Plan and Archaeological Potential Map provide guidance on addressing the policies of this Section. New development and site alteration shall meet all items required by this Plan, and shall strive to achieve all items encouraged in this Plan, unless the requirement for archaeological assessment is further scoped in local municipal official plans to address specific types of development or specific areas such as heritage conservation districts.
43.	2.5 (Objective)	Conservation Authorities do not get involved in excess soil management outside of their regulated areas per O. Reg. 166/06. It is preferred that the management of excess soil outside of areas regulated by O. Reg. 166/06 be left to Project Leaders (a representative that could be a developer, Markham staff, etc.) to manage.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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44.	2.5.2	It is understood that O. Reg. 406/19 requires Project Leaders to properly manage excess soil for projects in compliance with the O. Reg. 406/19. Markham's policies, standards, by-laws, and guidelines will include wording requiring all Project Leaders and all projects in Markham (including land development projects) to comply with O. Reg. 406/19.
45.	2.5.3	Comment on 2.5.2 applies here as well.
46.	2010 ROP Section 3.2	Clarify if the deleted policies in Section 3.2 of the 2010 ROP are reflected in other non-ROP policy documents.
47.	2010 ROP Section 4.5	Clarify why several policies in Section 4.5 of the 2010 ROP on financial management were deleted.
48.	2010 ROP Policies 3.1.7 and 3.1.10	Clarify why former ROP policies 3.1.7 and 3.1.10 were deleted.
49.	2010 ROP Policy 3.5.1	This policy has been deleted. Is a timeframe to update The York Region Housing Needs Study included in the Housing and Homelessness Plan?
50.	2010 ROP Policy 3.5.18	This policy has been deleted. Are policies to encourage building design that will facilitate subsequent conversion to provide additional housing units, such as secondary suites, included elsewhere in the ROP.
51.	2010 ROP Policy 4.4.5	Does deletion of this policy mean that we have to use the ROP definition of major retail for conversion purposes?
Chapter 3		
52.	Chapter 3	Consider including policies that provide direction for ecological offsetting.
53.	3.1.1.2	For c), should infrastructure such as roads in terms of monitoring of long-term cumulative impact be mentioned? While the aim of natural heritage policies is to guide development away from the natural heritage system (NHS), new infrastructure is often allowed to cross and impact the NHS, and infrastructure 'improvements' (e.g. road widening) will also result in NHS impacts and losses.
54.	3.2.5	Policy 3.2.5 is a notwithstanding clause to allow some uses in the Greenlands System, but subparagraph 3.2.5(d)(i) identifies "without negative impact" as the threshold. In its purist form, no negative impact would mean avoiding any impacts of the Greenlands System with alternative infrastructure location and/or design. Recognizing that the Draft ROP is using the same language as the PPS (Policy 2.1.5), clarify if the intent of subparagraph (d)(i) is to allow for compensation and net ecological gain.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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55.	3.2.7	Consider adding an 'encourage' policy that lands in the Greenlands System be conveyed into public ownership to ensure long-term protection in accordance with PPS Policy 2.1.1.
56.	3.3	Add hydrogeologic function to the "Objective" statement to cover water cycle/interaction with the groundwater source (hydrologic function only covers surface water). This should apply to all of the "hydrologic" wordings within this section if the policies are intended to include groundwater source.
57.	3.3.4	Should this policy reference the policies of the Source Protection Plan (i.e., all municipal policies and plans per the Source Protection Plan)?
58.	3.3.5	Since ESGRAs and Significant Surface Water Contribution Areas were not assessed during the Secondary Plans and MESPs for the current FUA in the northwest part of Markham, do the best practices need to be revisited with attention to parameters such as (1) infiltration targets and (2) improved retention and cooling of rainwater and subsequent release into receiving streams?
59.	3.3.6	Clarify if the Oak Ridges Moraine policies should be referenced here as well.
60.	3.3.5 and 3.3.7	A text box may be warranted here to identify the types of parameters that describe the "hydrologic functions" (policy 3.3.5) and the "characteristics and functions" (policy 3.3.7), such as such as infiltration rates, streamflow within natural ranges of variability, baseflow, wetland hydroperiod, etc.
61.	3.3.9	Clarify if this should reference the Source Protection Plan (SPP) for consistency. According to the SPP, developments involving (a) and/or (b) type of development applications require proponents to prepare and submit a contamination/spill management report to the water resources section at the Region of York for review and approval.
62.	3.3.1.2	Revise this policy to reference the policies in the Source Water Protection Plan which directs the review and approval of ministerial and chemical or salt storage sites to the Region's Water Resources Department for review and approval.
63.	3.4.2.3	Clarify what is intended by this policy. Is it to recognize instances where infrastructure may need to cross a significant woodland? This policy may not be needed unless it is to strengthen the policy intent to protect significant woodlands.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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64.	3.4.2.7 and 3.4.2.8	Amend policies 3.4.2.7 and 3.4.2.8 to ensure principles of no net loss of land area to the designated natural heritage system and overall net ecological gain (e.g. restoration planting in parts of the existing natural heritage system).
65.	3.5.5	For b), wording such as “recognize” or “support” would be more appropriate than “identify”.
Chapter 4		
66.	4.1.1	This policy speaks to the primary location for growth and development within the Region and makes reference to Community Area and Map 1B. Map 1B identifies new Community Area in the north east area of Markham. However, the Region’s Water and Wastewater Master Plan does not identify any regional infrastructure to support growth in this new Community Area. It appears that there is a misalignment between this Plan and the Water and Wastewater Master Plan Update.
67.	4.1.3	The following revision is suggested to streamline the intensification hierarchy given that MTSAs are located throughout the urban system and located in Regional Centres and Corridors as well as Local Centres and Corridors (the Milliken and Mount Joy MTSAs are two good examples of this): i. Regional Centres; ii. Subway Station Major Transit Station Areas; iii. Other Major Transit Station Areas iv. Regional Corridors outside of major transit station areas; and v. Local centres and corridors outside of major transit station areas. Preamble or sidebar text could also be used to clarify the intent of distinguishing subway MTSAs from other MTSAs in the intensification hierarchy.
68.	4.2.3 a)	Consider removing "if necessary" from this policy as the need has already been determined through the LNA.
69.	4.2.4	Clarify what is considered an appropriate "balance" of residential and compatible employment uses? Does it relate to the activity rate that is in the plan, or is it up to the local municipality to decide what the balance is?
70.	4.2.6	Revise this policy to clarify that major retail uses should not be permitted in employment areas.

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71.	4.2.1.1	Policy 5.2.15 in the 2010 ROP, which provides direction to re-examine the people and jobs per hectare in designated greenfield area secondary plan areas that are not completely built, is preferred to the new policy proposed here.
72.	4.2.1.2	Policy 5.2.16 in the 2010 ROP, which provides direction for secondary and subdivision plans within the designated greenfield area that are not approved, is preferred to the new policy proposed here. Clarify what is considered a "timely manner" for completing secondary plans.
73.	4.2.1.3	Consider revising the policy to clarify that a subwatershed plan or equivalent is needed to inform the preparation of secondary plans for new community areas. Suggested edit: "Secondary Plans for new community areas shall be..."
74.	4.2.1.4	Consider adding a network of open space and parks, enhanced tree canopy/preservation opportunities, and integration of heritage resources to the list of community core areas.
75.	4.2.1.5	Clarify the benefit of requiring local municipalities to set residents to job ratio targets for each new community area.
76.	4.2.1.6	Policy 2.3.1.5 only requires local municipalities to develop municipal-wide community energy plans. This does not limit local municipalities from including requirements for community energy plans for secondary plans and major developments in their official plans, but this could be challenged by stakeholders as going beyond the Region's official Plan. Refer to report for recommendation.
77.	4.2.1.7	There appears to be a copy and paste error in Policies 4.2.1.7 b. and c. (the entirety of b is restated in c). C used to speak to strategies to "minimize stormwater volume and contaminant loads" which are important and may have unintentionally been deleted. Consider deleting "management needs and areas and" in 4.2.17 d to clarify and streamline the policy.
78.	4.2.1.9	Clarify the intent of this policy as there are no major transit station areas or new rapid transit corridors identified in the new community areas.
79.	4.2.1.10	Clarify the intent of this policy as there are no major transit station areas identified in the new community areas.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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80.	4.2.1.12	New community areas would also be considered designated greenfield areas (DGA). The target of 65 people and jobs per hectare in this policy seems to conflict with Policy 4.2.7 that assigns a minimum DGA target of 70 people and jobs per hectare in Markham. In addition it is unclear what the end of the sentence is trying to achieve (i.e., "and 18 residential units per hectare") as the beginning of the policy speaks to both residents and jobs.
81.	4.2.2	Where do Community Structure Plans and Community Design Plans fit in? Should they be mentioned in this section?
82.	4.2.2.2	Clarify if d) "a maximum number of concession blocks being permitted to develop at any one time", applies locally or region-wide.
83.	4.2.2.4	For b) what time period would this be calculated over, and what if the local municipality is achieving their intensification rate? We suggest linking this to Table 1. For c) assuming the 1.5 million is based on growth post 2031, should the availability of draft approved or serviced lots also be considered as a threshold? We suggest linking this to Table 6. For h) clarify what the "subsequent phase/preceding phase" means and how it is to be applied when considering a new secondary plan. As it is written now, it appears difficult to implement, especially with criteria i. We suggest removing sub-criteria i under h). Refer to staff report for further detail and recommendations.
84.	4.3.10	Why is it just these areas? Do they have a different priority for protection?
85.	4.3.15	Major retail is not permitted in Markham's core employment areas (i.e., 'Business Park Employment, and 'General Employment' designations). Suggest moving a) to policy 4.3.14 to not permit major retail in all employment areas. Core employment areas also do not permit retail uses that are not accessory. Suggest moving 4.3.14 d (boarding schools) and e (other uses where individuals reside on a temporary or permanent basis) to this policy.
86.	4.3.25	Clarify what "a mix of amenities" of amenities is referred to here.
87.	4.3.26	Consider expanding the list of criteria for flexible and adaptable employment areas to include: - redevelopment and intensification; and - climate adaptation measures, including green infrastructure, and climate mitigation actions including renewable energy and alternative energy systems.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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88.	4.4	The first and second paragraphs of the preamble differentiate subway stations from other MTSAs when describing the intensification hierarchy. Any revisions to the hierarchy in Section 4.1.3 should be reflected here and in the graphic on the next page. With regard to "the missing middle" see also comments to Section 4.4.16 below. The objective under the preamble contains a spelling typo (i.e., "signification" should be "significant"). Also, should "cities" be "communities"?
89.	4.4.8	The inclusion of "larger family type units" is helpful. Stronger policy text could be that local municipalities shall identify mechanisms to require larger family type units in local official plans.
90.	4.4.9	Clarify what is considered a "significant" amount of mixed-uses.
91.	4.4.11	For c), clarify the time period (i.e., should this be to build out or to meet the 2051 forecast?) Also, the corresponding section in the 2010 ROP provided direction to "identify and map", but "map" appears to have been removed. Should it be added for clarity? For d), clarify what is intended by this policy. Should this only be applied to MTSAs?
92.	4.4.16	Should the official plan not focus on land uses as "missing middle" does not appear to be defined and it could speak to finding appropriate locations to support medium density mid rise development? The housing section already speaks to an appropriate mix and range of housing types and could be combined in that section as well.
93.	4.4.17	Suggest deleting reference to "gentle density" as it will be used to support NIMBYism.
94.	4.4.19	Consider replacing both instances of "shall" with "encourage" in this policy.
95.	4.4.22	Should the statement about the preferred location of major office uses in SGA's also be included in Section 4.3?
96.	4.4.23 and 4.4.24	The same comments to Policies 2.3.2.2 and 2.3.2.3 apply here as well. It is questioned whether a minimum of 35% of new housing units in Regional Centres and MTSAs is achievable and implementable.
97.	4.4.25	Should "rental" be replaced with "affordable housing" as per Section 28 of the Planning Act?

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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98.	4.4.26	The text box at the bottom of this page states that "For the purposes of this Plan, strategic growth areas consist of Regional Centres, subway station Major Transit Station Areas, Regional Corridors, and local Centres and Corridors". Clarify why are non-subway MTSAs left out.
99.	4.4.27	What is the intent of this policy? Do we not want approval of intensification in secondary plan areas?
100.	4.4.1 (Preamble)	Should the reference to subway stations in the third preamble paragraph be "Together with the areas surrounding subway stations"?
101.	4.4.23	Please refer to concerns raised above on policies 2.3.2.2 and 2.3.2.3.
102.	4.4.24	Please refer to concerns raised above on policies 2.3.2.2 and 2.3.2.3.
103.	4.4.1.4	Consider replacing the phrase "shall be" with "should be".
104.	4.4.25	Should "rental" be replaced with "affordable housing" as per Section 28 of the Planning Act?
105.	4.4.1.6	For g) Question whether the long-term resident to employee target ratio of 1:1 for Regional Centres is realistic.
106.	4.4.2.4	This policy refers to the “protected major transit stations areas identified on Map 1B”, however Map 1B does not differentiate between protected and not protected MTSAs. Map 1B should be revised to indicate all MTSAs in York Region are protected MTSAs.
107.	4.4.2.7	The Region should consider a scoped MCR to identify additional protected MTSAs in Markham should the Province agree to additional GO Stations at Denison Street and Major Mackenzie Drive East currently being explored through the Milliken and Markham Road - Mount Joy Secondary Plan Studies.
108.	4.4.2.9	For j) please see comments to policies 2.3.2.2. and 2.3.2.3 which would apply here as well.
109.	4.4.2.10	For a) all MTSAs in Markham, including the subway stations on the Yonge North Subway Extension, should be identified as protected Major Transit Station Areas to enable the implementation of inclusionary zoning. This policy also appears to be inconsistent with draft policy 4.4.2.4 which refers to the “protected major transit stations areas identified on Map 1B”, however Map 1B does not differentiate between protected and not protected MTSAs. Map 1B should be revised to indicate all MTSAs in York Region are protected MTSAs.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
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110.	4.6 (Section)	Remove the identification of Future Urban Area from the draft ROP, as this contradicts the underlying designation of agricultural area as shown in Map 1A. Refer to staff report for recommendation.
111.	5.2.39 (ROP 2010)	Clarify why this policy is being deleted as it provides for Regional support to local municipalities with information, resources and training to implement sustainable building policies. Also, a similar policy should be considered to support climate change policy implementation?
112.	2010 ROP Policy 4.3.1	This policy states that the employment forecasts in Table 1 of this Plan be used as the basis for planning, etc. Clarify why Table 1 is not referenced as the basis for planning for employment in the draft ROP.
Chapter 5		
113.	Chapter 5	Consider adding a new policy to confirm that infrastructure across the green fingers meets the intent of policy 4.2.1 in the Greenbelt Plan.
114.	5.3.7	Consider amending policy 5.3.7 to replace the opening text, “That rural lands”, with a notwithstanding provision such as, “Notwithstanding the Rural Area designation in this Plan ...”. Similarly, replace the text, “shall be identified in local official plans and protected for ...”, with “these lands shall be designated in local official plans to protect for ...”.
Chapter 6		
115.	Chapter 6	Please refer to comments on the York Region Transportation Master Plan update provided to Markham’s Development Services Committee on February 15, 2022 .
116.	Section 6.2	As noted in the comments to Chapter 2, consider speaking to all the pillars of sustainability (i.e., environmental, social and fiscal) in the objectives and policies, which currently emphasize fiscal sustainability.
117.	6.2.3	For c), clarify how often monitoring and adjusting the timing of infrastructure delivery would be undertaken. For d) clarify how this will be implemented so that the Region can deliver infrastructure in alignment with growth. Also, consider updating the policy to include and address MZOs.
118.	6.2.4	Clarify how frequently the review and coordination of the delivery of Regional services with local municipalities will take place, in what format, etc. Also, clarify how the Region’s infrastructure program would be adjusted to reflect the outcome of the review.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

No.	Chapter Subsection/ Policy No./Definition/Map No.	Staff Comment
119.	6.1.1.2	It is unclear what parking monitoring will consist of. Typically parking standards are under the local municipalities' jurisdiction.
120.	6.3.2	Consider adding new policies in this section that speak to integrating: • mobility-as-a-service (e.g., ride-share and ride-hailing) at rapid transit stations; and • Regional and local active transportation networks to connect to all transit stops including rapid transit stations and regular bus stops.
121.	6.3.3.4	Consider revising the figure under this policy to include an in-boulevard rather than on-road cycling facility.
122.	6.3.3.11	Clarify if the change to a 41 m right-of-way will result in inconsistencies with development applications where 43 m was required for the right-of-way.
123.	6.3.3.16	It seems the reference should be to Map 11 rather than Map 10. Also, the policy makes reference to interchanges and ramp extensions which should also be shown on Map 11.
124.	6.3.5.7	While staff generally support the intent of the employment mapping and site specific policy for the Toronto Buttonville Airport lands, there is concern that the policy may not conform to the Growth Plan as it could be interpreted as permitting an employment conversion outside of an MCR. City staff also recommend minor revisions to the draft ROP policy 6.4.5.7 as shown in bold: “That the Toronto Buttonville Airport lands are designated for business park use in the City of Markham Official Plan, including permission to operate an airport. When airport operations at the Buttonville Airport cease, the significant majority of the subject lands shall be retained for business park use, and the balance for a mix of urban uses. The City of Markham, in consultation with the Region, will determine the details of the final extent of employment designation for future use of these lands through an implementing secondary plan process. ensuring that the significant majority of the lands are retained for business park use.
125.	Section 6.4	The Region should consider the lowest total life cycle costs to both the Region and Local Municipalities, and ultimately York Region's residents when following Region's policy.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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126.	6.4.1	Remove the word “from contamination” in the objective statement since “water quality” covers all types of contamination. The current objective does not provide water quantity protection because of the use of the wording “from contamination”.
127.	6.4.3	Clarify how this policy applies to plans of subdivision, site plans, etc., associated with MZO applications. Markham has a number of MZOs where plans of subdivision and site plan applications will be submitted for locations where there are no regional water and wastewater services in place, and the Region’s Water and Wastewater Master Plan update has not shown any planned regional infrastructure to ‘ensure that water and waste water services will be available prior to occupancy’.
128.	6.4.8	Clarify if the "employment uses" referred to in this policy are the same uses permitted in both core and supporting employment areas as proposed in chapter 4. For b), suggest this should also specify to the satisfaction of local municipalities since the intent is to connect to municipal services as part of the municipal system.
129.	6.4.10	Clarification is needed on the intent of this policy. This policy has been modified from the 2010 Regional Official Plan from requiring local official plans to identify regional wastewater treatment plants and appropriate buffer areas according to Provincial guidelines, to requiring local official plans to also identify regional wells, water treatment plants, and private communal water and sewage systems, which may not be feasible.
130.	6.5	(Preamble, second paragraph) The projected impacts of climate change also include the increased frequency of storms. Add the word "frequency" to the second sentence in the second paragraph. At the end of the second paragraph, add "prevent future or downstream flooding" since stormwater management is more about managing the increase in stormwater (from development, climate change, etc.) at the source to prevent downstream flooding, erosion, etc. (Preamble, third paragraph) Without proper treatment, stormwater can only be used/re-used for non-potable purposes. (Objective) Consider adding meeting the latest relevant SWM guidelines to the objective.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
No.	Chapter Subsection/ Policy No./Definition/Map No.	Staff Comment
131.	6.5.1	Consider revising this policy to speak to flooding, specifically downstream flood protection, as it currently focuses on water quality.
132.	6.5.2	Revise this policy to speak to the use of quantity and quality controls when designing stormwater management facilities. The current policy only suggests quality control requirements (e.g., "reduce risk of contamination").
133.	6.7.7	Clarify the intent of this policy, and consider replacing "require" with "encourage". Also, clarify what "open access conduit" refers to.
134.	6.7.11	Is the intent of the text, "Local municipalities shall specify in detail where renewable energy projects will be permitted.", to provide the detail for permissions for renewable energy projects in updating of zoning by-laws? Are other planning instruments contemplated by the Region?
135.	7.2.16 (2010 ROP)	Clarify why this policy was not carried forward in the draft ROP. It is recommended that it be included.
136.	7.2.58 (2010 ROP)	Clarify why this policy was not carried forward in the draft ROP. It is recommended that it be included.
Chapter 7		
137.	7.1	Review policies to ensure that the draft ROP is consistent with section 2.6.5 of the Provincial Policy Statement as it pertains to indigenous engagement.
138.	7.4.5	Note that lands below the 245 m contour are only subject to the Greenbelt Plan under certain circumstances as per section 2.1 of the Greenbelt Plan (i.e., in the countryside/settlement designation and does not connect to the Greenbelt). Markham approved OPA 27 that confirmed lands in the Oak Ridges Moraine Conservation Area that are below the 245 m contour line are not subject to the Oak Ridges Moraine Conservation Plan or the Greenbelt Plan.
139.	7.3.18 (2010 ROP)	Clarify why this policy was not carried forward in the draft ROP. It is recommended that it be included.
140.	7.3.22 (2010 ROP)	Clarify why this policy was not carried forward in the draft ROP, particularly if policy 7.3.23 in the 2010 Regional Official Plan is being deleted. It is recommended that it be included.
141.	7.3.27, 7.3.28, 7.3.30, 7.3.31, 7.3.32 (2010 ROP)	Clarify why this policy was not carried forward in the draft ROP. It is recommended that it be included.
Definitions		

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
No.	Chapter Subsection/ Policy No./Definition/Map No.	Staff Comment
142.	Adjacent Lands	Re-insert the reference to cultural heritage resources in this definition. The current definition only refers to natural heritage features and other adjacencies. Recommended edit: "Those lands contiguous to existing or planned corridors and transportation facilities where development would have a negative impact on the corridor or facility. Those lands contiguous to a specific natural heritage feature or key hydrologic feature where it is likely that development or site alteration can reasonably be expected to have a negative impact on the feature. Those lands contiguous to lands on the surface of known petroleum resources, mineral deposits, or deposits of mineral aggregate resources where it is likely that development would constrain future access to the resources. Lands contiguous to cultural heritage resources. The extent of the adjacent lands may be recommended by the Province or based on municipal approaches which achieve the same objective. Generally, adjacent lands are considered to be within 120m from any part of the feature."
143.	Affordable	Consider revising the definition to provide flexibility for local municipalities to use average local market rents by adding "or the local market area" after "regional market area" in the second sentence. Refer to the staff report for further discussion.
144.	Conserved	This definition should include the word "conserve" as having the same meaning.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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145.	Cultural and regenerating woodland	The definition of "cultural and regenerating woodland" could include many fragmented woodlands. Most small and fragmented woodlands are likely not able to be maintained by self-seeding or the soil seed bank and will require management. Recommended edit: "For the purpose of policy 3.4.2.7, woodlands where the ecological functions of the site are substantially compromised as a result of prior land use activity and would be difficult to restore and/or manage as a native woodland in an urban setting. An environmental impact study should assess these ecological functions with consideration of the following: • the woodland is regenerating, typically with a dominant proportion of woody species being invasive and non-native (e.g., Norway Maple, Manitoba Maple, Siberian Elm, Scots Pine, European Buckthorn, White Mulberry, Tree-of-heaven, Apple, White Poplar, etc.) • the area was not treed approximately 20 to 25 years ago as determined through air photo interpretation or other suitable technique • soils may be degraded, for example, soil may be compacted, the topsoil removed, or there may be substantial erosion from over-use and/or the woodland may be regenerating on fill • there is limited ability to maintain or restore self-sustaining ecological functions typical of native woodlands Woodlands (including plantations) established and/or managed for the purpose of restoring a native tree community are excluded from cultural and regenerating woodlands (e.g. naturalization or restoration projects)."
146.	Future Urban Area	The proposed definition and identification of "Future Urban Area" in the draft ROP seems to contradict protection of agricultural systems, where it is proposed to be the underlay designation for Future Urban Area. It is recommended that the "Future Urban Area" overlay identified in Map 1B the draft ROP within the City of Markham be removed.
147.	Major Office	Consider revising the definition for major office in the draft ROP to align with the definition in the Growth Plan, 2019. The higher minimum area for freestanding office buildings in the draft ROP definition may be challenging to implement at the local level.
148.	Sustainable Mobility Measures	Recommended removing "during rush hours" from definition.

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan		
No.	Chapter Subsection/ Policy No./Definition/Map No.	Staff Comment
149.	Woodland	Revise the definition of woodlands to align with the Provincial Policy Statement, 2020 definition that includes consideration of stem densities (similar to that of the Guelph Official Plan).
Maps and Appendices		
150.	Map 1A	Revise Map 1A to: ● Remove lands from the Employment Area designation to reflect Regional Council's decision regarding employment conversion request M3; ● Include lands from deferred employment conversion requests M4 and M7 in the Employment Area designation; ● Remove lands from the Community Area designation in two areas as shown in Figure 3 to the staff report; and ● Amend the Markham Centre employment area mapping west of Warden Avenue in the draft ROP to reflect the in-effect employment designations of Official Plan Amendment (OPA) 21 to the 1987 Markham Official Plan.
151.	Map 1B	Map 1B shows the area bounded by Elgin Mills Road East, Kennedy Road, Markham's northern boundary, and Highway 48 as New Community Area, which are lands to be added to the current urban area through the MCR process. However, the Region's Water and Wastewater Master Plan does not show any planned regional infrastructure to service this New Community Area. The ROP and the Water and Wastewater Master Plan do not align and should be reviewed. Revise Map 1B to: ● Include text or revise the text in the legend to indicate that all Major Transit Station Areas (MTSAs) in Markham are protected MTSAs to facilitate implementation of inclusionary zoning. ● Remove the Future Urban Area overlay.
152.	Map 3	Clarify if candidate ANSIs are intended to be shown on this map. The Robinson Swamp PSW is a candidate ANSI (Life Science).

Appendix 'A' - City of Markham Staff Comments on Draft York Region Official Plan

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153.	Map 4	Review seepage areas and springs, specifically on lands within the York Downs Golf Course, Robinson Glen block and Angus Glen block (outside of the NHS), with Markham staff. There are concerns that some of the lands shown as seepage areas and springs on this map have already been confirmed as developable land through environmental impact studies and master environmental servicing plans (i.e, the studies did not identify any seepage areas and springs). Key hydrologic features such as seeps and springs are protected under the Growth Plan, and any mapping with seeps and springs in developed areas should only be shown where there is a high level of confidence.
154.	Map 10	Revise this map to include a GO Rail Station subject to further study at Denison Street. Refer also to comments on the York Region Transportation Master Plan Update provided to Markham's Development Services Committee on February 15, 2022 .
155.	Map 11	Remove the Donald Cousens Parkway extension from this map as it was removed in the Transportation Master Plan Update.
156.	Map 12B	Confirm which policies apply to this map. There is some concern with this mapping as it appears to extend significantly into Markham Centre and other developed communities (e.g., Greensborough and Wismer Commons).
157.	Appendix 1	Comments to policy 4.3.21 apply to this appendix as well.
158.	Appendix 2	Delete MTSA 14 - Langstaff-Longbridge Subway Station given that a subway station is no longer contemplated on Yonge Street south of Highway 7 on the Yonge North Subway Extension. Also, revise the delineations of MTSA 13 - Langstaff GO Station and MTSA 20 - Royal Orchard Subway Station to incorporate lands from the former Langstaff-Longbridge Subway Station as shown in Figure 1.