

Town of Whitchurch-Stouffville Official Plan Review

AGENCY COMMENTS, 3RD DRAFT OFFICIAL PLAN, JUNE 2023

York Region Comments on 2nd Draft Official Plan (December 2022)

Section/ Commenter	Comments	Proposed Action/Response
General Comments		
General Comment (LRP)	For ease of navigation through the Official Plan, it would be helpful to include a header or footer on each page to identify the Chapter and/or section throughout the document.	Completed
General Comment - Typos (LRP)	<ul style="list-style-type: none"> • 3.7.4.6 - typo in number of reference policy • Typo in preamble on page 236, second paragraph of preamble: linkage • Typo in preamble on page 296, second paragraph of preamble: The 	Typos resolved.
General Comment - Policy Numbering (LRP)	<ul style="list-style-type: none"> • Complete Community section and Section 3.1 have the same policy numbering. This results in two policies with the same number. • 5.4.7.1, 5.4.5.1: sub policies do not begin with a) • 6.2.3.1c: missing the section number to reference 	Typos resolved.

General Comments (YRPH)	For other references to the “Ministry of Environment and Energy”, replace with the “Ministry of Environment, Conservation and Parks”.	References updated.
General Comments (YRPH)	Specific to Industrial Areas, consider opportunities where employees can safely access their places of employment via sustainable modes of transportation (e.g., connectivity to transit hubs).	See Section 3.8.2.1.v
General Comments (YRPH)	With respect to Neighbourhood Areas consider including accessibility to a variety of food venues that includes fresh food to align with complete communities.	See Sections 3.1.1.9, 3.4.3 and 5.3
General Comments (YRPH)	Accessibility and affordability of healthy sustainable foods can be supported through land use planning and design. Where possible throughout the plan, consider including policy directives that ensure accessible, affordable food venues are available in all communities and appropriate for all populations.	See Sections 3.1.1.9, 3.4.3 and 5.3
Introduction & Chapter 1 – Re-imagine Stouffville		
1.3.3 to 1.3.8 (DP)	These sections provide wording on how Provincial plans are the basis for the Official Plan. Missing reference to “Metrolinx 2041 Regional Transportation Plan” and “Connecting the GGH: A Transportation Plan for the Greater Golden Horseshoe” This is found in YROP policy 4.1.5.	See Section Preamble – Legislative Basis for This Plan.
1.3.6 (LRP)	The Official Plan should include Lake Simcoe Protection Plan conformity with this new draft instead of through a future amendment.	See Section Preamble – Legislative Basis for This Plan.
Guiding Principles (LRP)	The Official Plan is a land use planning document. The overarching goals or guiding principles should address managing the growth in Whitchurch-Stouffville to 2051 and phasing this growth in alignment with infrastructure planning; similar to Regional Official Plan planning principles #1 and #2.	Section 1.2.1.2 revised to note that infrastructure should align with growth.
Chapter 2 – Planning for Growth		
Chapter 2 (LRP)	Policies addressing enhancing existing communities does not address community facilities/retail/personal service gaps or naturalizing underutilized public spaces (reference Regional Official Plan policy 2.3.15 f and g).	See Section 3.1.1

Chapter 2 (LRP)	A comprehensive parking policy addressing shared parking, surface parking between main building entrance and street, adaptive reuse of surface parking, preferential locations for carpooling/car sharing/bicycle storage, parking for on demand deliveries/vehicles and best practices for winter de-icing chemicals are missing (reference Regional Official Plan policy 2.3.19). Some elements of these policies were only applied in business parks and retail areas. Best practices for winter de-icing was a Provincial modification to the Regional Official Plan.	See Section 2.10.1. u
2.1.1.1a (LRP)	The Built-Up Area is not defined to reference the 2006 Growth Plan. The 2006 timeframe should either be referenced in policy or in the definition of 'Built Up Area'.	This has been added to the definition (Section 8)
2.1.1.1b (LRP)	Since the reference in this policy is for Ballantrae in the last sentence, consider rephrasing from "More modest growth..." to "Modest growth..."	Completed
2.1.1.1e (LRP)	This policy covers the Agricultural system including Rural Areas. Functions of Rural Areas should be embedded as well under Agriculture (e) such as tourism, recreation and containing natural resources	This has been added to Section 2.1.1.1e
2.3 (DP)	YROP policies 4.4.48 – 4.4.49 requires the identification of "Local Centres and Corridors" to be consistent with Section 4.4 of the YROP. The OP does not seem to have specific policies on "Local Centres and Corridors". Section 2.3 contains policies on Strategic Growth Areas, which includes detailed policies that address high-density mixed-use development found along Local Corridors.	Section 2.2.7 has been updated to include ROP policies on local centres and corridors
2.3 (DP)	YROP policy 4.4.51 requires local municipalities to identify locations within Local Corridors where the missing middle can be accommodated. There does not seem to be a specific policy in the OP on this.	Section 2.2.7 has been updated to include ROP policies on the missing middle
2.3 (DP)	YROP policy 4.4.52 encourages municipalities to permit as of right zoning for the missing middle in local corridors. There does not seem to be a specific policy in the OP on this.	See Section 2.2.7.5

2.3 (DP)	YROP policy 4.5.6 (a-c) requires that Local Centres located within Towns and Villages should meet the following criteria, in addition to the policies 4.4.47 to 4.4.53 of the YROP. There does not appear to be any specific policies for Local Centres, however, site-specific policies are provided for various communities such as Stouffville that address core areas. Please add the specific criteria identified in YROP policy 4.5.5 (a-e).	See 2.2.7.3 to 2.2.7.9
2.4.6 (DP)	YROP policy 4.2.23 requires local OP policies for New Community Areas that address the interface between urban and agricultural operations. There does not seem to be a specific policy in the OP on this.	See 2.1.1.1.b
2.4.8 (LRP)	Recognize through 'Schedule B – Provincial Plan Areas and Designations' that Provincial designations are identified visually, however, there is no formal recognition of Provincial Plans within Town structure policies. Include Provincial designations into policy.	Provincial Plans and associated designations are acknowledged through the NHS on Schedule A and provided in more detail in Schedule B and Section 4.
2.5.1 (DP)	YROP policies 4.3.22 – 4.3.24 requires employment density targets to be achieved according to Table 5 (Appendix 1) of the YROP. There does not seem to be a specific policy in the OP on this.	See 2.6.1.1.r-t
2.5.1.1 (LRP)	Updated population and employment forecasts following Provincial modifications to the Regional Official Plan should be included in the next draft.	Completed.
2.5.1.6b (LRP)	Add the word 'demonstrated' prior to 'progress'. This was a Provincial modification to the Regional Official Plan.	See 2.6.1.1.f
2.5.1.2 (IAM)	<p>Recognize that the growth forecasts to 2051 established by York Region are minimum growth forecasts that the Town is required to plan to achieve. The Town may achieve higher growth projections in consideration of the actual potential of the Town to accommodate appropriate growth.</p> <p>IAM Comments: The YROP population and employment forecasts to 2051 form the basis for planning of new development in the Region including water and wastewater infrastructure planning.</p>	Noted.

	<ul style="list-style-type: none"> While higher growth may be achievable, it must be supported by servicing infrastructure being available, which will require coordination of Town and Regional infrastructure. 	
2.5.1.8 (YRPH)	YRPH supports policies that integrate climate change considerations into planning and managing growth to help build complete communities.	Noted.
2.5.2.7 (DP)	YROP policy 4.4.5 (a-d) requires that local municipal official plans, secondary plans, or other comprehensive plans, and development contemplated within strategic growth areas shall plan for growth consistent with the Regional intensification hierarchy, planned transit, water, wastewater and road capacity and the provision of parks, schools etc. The policy in the OP does not address this entirely.	Section 2.6.1.1.g has been updated to note ‘planned transit, water, wastewater and road capacity and the provision of parks, schools etc.’ should accompany growth.
2.6.1 (DP)	YROP policy 6.3.17 requires active transportation facilities, sidewalks, street lighting and street furniture along Regional roads and that sidewalks and street lighting are provided on both sides of all streets within the Urban Area and Towns and Villages that are serviced by Transit. There does not seem to be a specific policy in the OP on this.	See Section 2.7.1.t
2.6.1.6 d. (LRP)	Consider including adjacent residential and employment areas, and making active transportation connections between and <u>within</u> these areas.	See Section 2.7.1.e.xi
2.6.1.6 j. (DP)	YROP policy 4.2.16 requires that Travel Demand Management (TDM) measures shall be completed for New Community Areas. While policy 2.6.1.6 j. requires implementing TDM criteria within any new development, it does not specify all the components of YROP policy 4.2.16 (a-h).	Section 2.7.1.f has been updated to include the ROP components.
2.6.5.5 (DP)	YROP policy 4.2.19 requires that a trail system shall be incorporated into the Greenlands System which is integrated as appropriate into the mobility system of the community. OP policy 2.6.5.5 does not make a reference to the Regional Greenlands System.	Policy has been updated to include Regional Greenlands System.
2.6.6 (DP)	YROP policy 6.3.58 directs the movement of hazardous goods to rail and roadways outside of the Urban Area and Towns and Villages to minimize risks and ensure the safe and efficient movement of goods, where possible. There does not seem to be a specific policy in the OP on this.	See 2.7.6.1.j

2.6.6.7 (LRP)	Major facilities is a defined term, however not utilized within this policy. Consider adding to this policy.	If not used, will be removed.
2.7.1 (DP)	YROP policy 6.7.3 (a-c) requires that local municipalities identify and include policies to protect existing and planned TransCanada Pipelines and facilities. There does not seem to be a specific policy in the OP on this.	See Section 2.11.1.9
2.7.5 (DP)	YROP policy 6.4.7 states that where the protection of public health is an issue, in areas of existing groundwater contamination as determined by a Medical Officer of Health, and where full municipal water and wastewater services is not planned, available, or feasible in such an area, and cannot be provided, wastewater treatment systems may be considered for existing residential development. There does not seem to be a specific policy in the OP on this.	See Section 2.8.5.1.p
2.7.5.14 (DP)	YROP policy 6.4.11 states that where local official plans permit minor infill in Towns and Villages and Hamlets on private individual wastewater systems consistent with current Provincial guidelines, these systems will be permitted only if it can be demonstrated to the local municipality that there are no adverse impacts on soil, surface or groundwater quality and quantity, and in accordance with applicable policies in respective Source Protection Plans. While the OP policy identifies the promoting safe and effective maintenance of private wastewater systems to protect groundwater, the policy does not include all the components of YROP policy 6.4.11.	See Section 2.8.5.1.n
Section 2.7.6 (LRP)	Policies for stormwater management plans missing minimizing natural drainage patterns and addressing flood risk/erosion (reference Regional Official Plan policy 2.3.33 a) and b).	See Section 2.6.8.1.a.iv
2.8.2.1.c (IAM)	The establishment of municipal water services or private communal water services shall be the long-term objective for the Community of Gormley, subject to an Environmental Assessment and all appropriate approvals . In the interim, each quadrant may be individually serviced by a single groundwater supply system for each quadrant. Such groundwater supply systems shall be supported by an Environmental Impact Study and/or Agricultural Impact Assessment appropriate studies and assessments, and shall be to the satisfaction of all approval bodies, including the Town, York Region, and the Province.	See Section 2.9.2.1.b

	<p>IAM Comments:</p> <ul style="list-style-type: none"> • See suggested edits • Addition “of all appropriate approvals” to capture any other approvals that may be needed, including potential approvals from the Province, or the Region (in the case of a Municipal Responsibility Agreement for private communal water system) • The original text limited the scope of the assessment required for communal systems (by calling out only EIS and AIA studies) and did not appear to conform to the Regional Official Plan, as required under the <i>Planning Act</i> • Additionally, it is noted that lake-based servicing (which is the basis for current municipal servicing near this area) is not currently permitted by Provincial regulations to be extended into the community of Gormley. 	
<p>2.8.2.1.f (IAM)</p>	<p>Implementation of water and wastewater servicing in these communities is subject to compliance with Provincial planning and policy requirements, as well as confirmation of technical, environmental, and financial feasibility through to the satisfaction of York Region and the Class Environmental Assessment process. AM Comments: Implementation of servicing in Gormley also subject to Regional requirements, particularly with respect to policies regarding private communal</p>	<p>See Section 2.12.2.1.e</p>
<p>2.8.2.2.d and 2.8.2.2.e (IAM)</p>	<p>systems. Land uses as identified in the Gormley Secondary Plan in effect as of November 2022, when the Regional Official Plan came into effect, Residential and small-scale commercial/industrial development may proceed on the basis of either private or communal sewage disposal systems, subject to appropriate studies, assessments and provisions policies in the York Region Official Plan, and subject to the approval of the Province, York Region and the Town. Small-scale is defined as any use which generates less than 4,500 L/day per lot for the sanitary needs of its employees. Large scale and multi-unit commercial/industrial development, defined as developments generating greater than 4,500L/day from the sanitary needs of its employees, may proceed on the basis of private or communal sewage systems, subject to the appropriate studies and provisions</p>	<p>See Section 2.9.2.2.c</p>

	<p>policies in the York Region Official Plan, and additionally require the approval of the Ministry of Environment and the Ministry of Natural Resources, the Town and York Region. Large scale and multiunit commercial/industrial development is defined as any use which generates greater than 4,500 L/day from the sanitary needs of its employees. IAM</p> <p>Comments:</p> <ul style="list-style-type: none"> • See revisions to combine 2.8.2.2.d and 2.8.2.2.e • Additional text edits to conform with servicing policies in the YROP (see YROP policy 5.4.8). 	
<p>2.8.2.3.e (IAM)</p>	<p>Communal sewage disposal systems may be either publicly or privately owned subject to the policies of the ORMCP particularly Part IV, Sections 43 and 44 and the private communal sewage services servicing provisions in the York Region Official Plan.</p> <p>IAM Comments:</p> <ul style="list-style-type: none"> • Suggest this clause be moved to section 2.8.2.2. 	<p>See Section 2.9.2.2.e</p>
<p>2.8.3.1, 2.8.3.2, 2.8.3.3 (IAM)</p>	<p>Development Outside the Servicing Study Area</p> <p>Until such time as the MESP is approved, all development outside the Servicing Study Area on Schedule G – Vandorf Land Use Designations may be serviced by private communal water services, private communal sewage services, individual on-site sewage services, or individual on- site water services subject to the following policies:</p> <p>2.8.3.1 Approval of new private communal water services or individual onsite water services shall require the submission of Functional Servicing Report, including a hydrogeological study which will evaluate the potential for well interference. In addition, new wells shall be required to be constructed to maximize hydraulic head.</p> <p>2.8.3.2 Approval of new private communal sewage services or individual on-site sewage services will require the submission of a Functional Servicing Report, including an assessment of the</p>	<p>See Section 2.9.3.1</p>

	<p>potential impact on the shallow soil and groundwater conditions and the susceptibility of the groundwater resource to contamination.</p> <p>2.8.3.3 New communal or individual on-site water and sewage services shall be designed to connect to municipal water and sewage services in a timely manner, at which such time as municipal water and sewage services may become available.</p> <p>IAM Comments:</p> <ul style="list-style-type: none"> • For development outside the servicing area, the addition of private communal water and wastewater servicing to servicing policies as written would not be in conformity with the YROP Hamlet servicing policies (see policies 5.4.3 and 5.4.8 of Region’s YROP). • At the time of YROP approval, the Vandorf Secondary Plan in-effect only permitted private communal systems within the Servicing Study Area (subject to an EA). Thus, private communal servicing is only permitted in the Study Area in order to conform with 5.4.8 of the Region’s YROP. 	
<p>2.8.3.6.a.i (IAM)</p>	<p>Servicing Study Area: New Development</p> <p>The preparation of a MESP to evaluate the preferred options for servicing the entire Servicing Study Area and the Community of Vandorf, which may consider municipal, communal or private individual water and sewage services. The MESP will detail the environmental, servicing and drainage requirements necessary to identify specific stormwater, sewage and water supply and transportation needs including roads, transit, pedestrian and bicycle facilities, prior to any development. Consideration of private communal water and wastewater systems shall be reviewed in the context of applicable Regional Guidelines, Provincial planning policies, as well as suitable administrative, engineering, environmental and financial arrangements to the satisfaction of York Region and the Province.</p> <p>IAM Comments:</p>	<p>See Section 2.9.3.3.b</p>

	<ul style="list-style-type: none"> • In addition to an MESP, new private communal water and wastewater systems are also subject to approval by the MECP and compliance with YROP policies pertaining to private communal systems • Added content from YROP on requirements for private communal systems • Additionally, it is noted that lake-based servicing (which is the basis for current municipal servicing near this area) is not currently permitted by Provincial regulations to be extended into the community of Vandorf • The added text may fit better as a new bullet (2.8.3.6.a.ii) in this section, as a private communal may not end up being the recommended servicing solution. 	
<p>2.8.3.6.b. (IAM)</p>	<p>Interim Servicing Solution (before MESP mentioned in 2.8.3.6.a.i is completed)</p> <p>Notwithstanding S 2.8.3.6 a), until such time that the MESP is approved, new development may be supported by an interim servicing solution within the Servicing Study Area in accordance with the following policies:</p> <p>i. A Functional Servicing Study may be undertaken for lands within either of the four quadrants demarcated by the intersection of Woodbine Avenue and Aurora Road. The Functional Servicing Study will identify an overall high-level interim servicing solution for the entirety of the respective quadrant, as well as detailed site servicing requirements for the lands subject to development applications.</p> <p>ii. The Functional Servicing Study will include an overall land use concept and detail the environmental, servicing and drainage requirements necessary to identify specific stormwater, sanitary, water supply and transportation needs including roads, transportation, utilities, pedestrian and bicycle facilities, and respective phasing, monitoring program and costs. Design and construction requirements to ensure protection of the environment, including groundwater, and the approach to stormwater management.</p> <p>Should interim private communal water and wastewater systems be proposed, these shall be reviewed in the context of applicable Regional Guidelines, Provincial planning policies, as well as suitable administrative, engineering, environmental and financial arrangements to the satisfaction of York Region and the Province</p>	<p>See Section 2.9.3.3.h</p>

iii. New communal or individual on-site water and sewage services shall be designed to connect to municipal water and sewage services in a timely manner, at such time as municipal water and sewage services may become available, and contingent upon the outcome and recommendations of the MESP.

iv. The Functional Servicing Study shall be prepared in accordance with Terms of Reference prepared by the Town, in consultation with the Conservation Authority, and York Region, and with input from the respective landowners.

v. Subsequent development within the respective quadrant will be required to conform to the overall Functional Servicing Study for the quadrant, or undertake any necessary updates, in addition to providing a more detailed analysis for their lands.

vi. The Town may require a peer review by an appropriate public agency or by a professional consultant retained by the Town at the applicant's expense.

vii. The Town may require that landowners, comprising a majority of the land area within the respective quadrant, with applications for development, enter into an agreement or agreements, amongst themselves, to address the coordination of infrastructure and sharing of the common costs of development.

IAM Comments:

- It is noted that the Vandorf Secondary Plan in effect at the time of ROP approval required development in the servicing study area to plan for comprehensive, long-term servicing which is somewhat diluted by the proposed new policies for interim servicing in the study area.
- Should an interim private communal water and wastewater system be proposed (particularly for residential development as identified in the existing Vandorf Secondary Plan that was in effect at the time of approval of the Region's 2022 ROP), it would be require Provincial approval and the Region may be required to enter into a Municipal Responsibility Agreement. Thus, consideration of private communal water and wastewater systems must be reviewed in the context of applicable Regional Guidelines, Provincial planning policies, as well as suitable administrative, engineering, environmental and financial arrangements to the satisfaction of York Region and the Province. Text has been added to this effect.

<p>2.8.4.3 (YRPH)</p>	<p>York Region Public Health requests the following edits be made in the Official Plan: New development shall only be permitted once existing servicing infrastructure is upgraded and provided it is demonstrated through appropriate studies to the satisfaction of the Town, York Region, the Health Protection Division of the Regional Health Services Department and the Province that the land can be adequately serviced using the highest available evaluation standards and most recent techniques and equipment.</p>	<p>See 2.9.4.1.b</p>
<p>2.8.4.6 (YRPH)</p>	<p>York Region Public Health requests the following edits be made in the Official Plan: 2.8.4.6 In all these designations, such development shall only be permitted provided it is demonstrated through appropriate studies to the satisfaction of the Town, York Region, the Health Protection Division of the Regional Health Services Department, the Ministry of Environment, Conservation and Parks, and Energy and the Ministry of Natural Resources that the land can be adequately serviced using the highest available evaluation standards.</p>	<p>See 2.4.9.2.b</p>
<p>2.8.4.7 to 2.8.4.10 (IAM)</p>	<p>Plans of Subdivision 2.8.4.7 Any development by plan of subdivision will be served by: <ul style="list-style-type: none"> a. A municipal communal water and sewer system; or, b. A municipal communal water system and individual private sewage treatment facilities. 2.8.4.8 A municipal communal water and/or sewer system is a system for which York Region or the Town is responsible either through: <ul style="list-style-type: none"> a. Assumption of ownership; or, </p>	<p>Ballantrae and ML servicing policies have been removed, in effect applies until such time as OPA 136 is resolved</p>

b. Via an agreement whereby the Region or Town agrees to assume the system in the event of default by the owner.

2.8.4.9 The water system used for such developments may be the proposed Ballantrae-Musselman Lake Water Works project, a modification of that project or individual communal systems developed for one or more subdivisions. Where individual systems are developed, they shall be constructed so that they may be connected to the Ballantrae/Musselman Lake Water Works project, or a modification of that project, if it is built.

2.8.4.10 In all these designations, such development shall only be permitted provided it is through appropriate studies to the satisfaction of the Town, York Region, ~~the Health Protection Division of the Regional Health Services Department~~, the Ministry of the Environment, Conservation and Parks ~~and Energy~~ and the Ministry of Natural Resources that the land can be adequately serviced using such systems using the highest available evaluation standards.

IAM Comments:

- 2.8.4.8 the language and definition for ‘municipal communal’ water and wastewater systems needs to be clarified as follows:
 - Municipal water and wastewater system is a system for which York Region or the Town is responsible either assumption of ownership;
 - Private communal water and wastewater system is a system for which York Region or the Town is responsible via an agreement whereby the Region or Town agrees to assume the system in the event of default by the owner
 - Please reflect these changes in 2.8.4.7
- As noted in the draft OP, servicing policies for Ballantrae and Musselman’s Lake Communities will be finalized through resolution of OPA 136.

2.8.5 (Water Resources)	ROP policy 2.5.2.d policy is not reflected in the OP. Please include the addition of the following policy: YROP policy 2.5.2.d - "The placement of excess soil is located outside of Key Natural Heritage Features and Key Hydrologic Features."	See Section 2.9.5.1.c
2.8.5.2 c (LRP)	Key natural heritage features, key hydrologic features, the Oak Ridges Moraine area, and cultural heritage resources are not addressed for placement of excess soil (reference Regional Official Plan policy 2.5.2 d and e).	See Section 2.9.5.1.c and d
Chapter 3 - Planning for Complete Communities		
Chapter 3 (LRP)	Although there are policies mentioning low carbon alternatives or carbon reduction measures, addressing net-zero emissions by 2050 is missing (reference Regional Official Plan policies 2.3.20 and 2.3.21).	See Section 3.1.1.1.f
Chapter 3 (LRP)	Policy to address retail, commercial, office and institutional buildings in compact form with multi-storey, mixed use elements missing (reference Regional Official Plan policy 2.3.11).	See Section 3.1.1.1.g
3.1 (DP)	YROP policy 4.4.15 requires that municipalities identify locations along Regional arterial roads and other major streets where the missing middle can be accommodated. There does not seem to be a specific policy in the OP on this.	See 3.2.1.1.k
3.1 (DP)	YROP policy 4.4.16 encourages the integration of gentle density and a mix and range of housing options within the built boundary, where locally appropriate, through redevelopment of existing neighbourhoods. There does not seem to be a specific policy in the OP on this.	See Section 3.1.1.1.h
3.1.1.6, 3.1.1.24 (LRP)	Emergency and transitional housing is not addressed when prioritizing lands for affordable housing. Policy to work with stakeholders to deliver housing in a timely manner missing (reference Regional Official Plan policy 2.3.43 a and c).	See Section 3.1.1.1.l and .m

3.1.1.17 (LRP)	Policy to address vertical or urban schools missing (reference Regional Official Plan policy 2.3.12d). This was a Provincial modification to the Regional Official Plan.	See 3.1.1.1.u
3.2.1.4 (YRPH)	YRPH supports policies that require applying a climate change lens when processing development applications and infrastructure project to manage risks as climate change mitigation and adaptation policies are important for human health.	Noted.
Section 3.2.2 (LRP)	Requirement for municipal-wide Community Energy Plan is missing (reference Regional Official Plan policy 2.3.24).	See 3.3.1.1.e
3.2.3 (YRPH)	YRPH supports the inclusion of air quality policies in the Official Plan that aim to improve air quality and reduce exposure to air pollution.	Noted.
3.2.3.3 (LRP)	Health, environmental and air quality impact studies that assess the impact on human health for development with significant known or potential air pollutant emission levels are required in the Regional Official Plan (reference policy 2.3.28), however at the Town's discretion in their draft Official Plan. This should be modified to a requirement.	See Section 3.3.3.1.c
3.2.4.2 (YRPH)	YRPH supports policies that consider the public health impacts of a changing climate in the development and renewable of the built environment. New development should respond to, and help mitigate air pollution, extreme heat, and flooding, particularly in areas with higher hazard risk.	Noted.
3.2.5 (LRP)	Sustainable development policies missing dark sky or light pollution abatement and indoor air quality. Policy 3.2.5.1 should include construction waste in e) and recycling and adaptive use in d) (reference Regional Official Plan policy 2.3.36 f-i).	See Section 3.3.5.1.a
3.2.5 (DP)	YROP policy 6.6.4 requires local municipalities to include standards for waste diversion, material storage and collection that maximize diversion and align with provincial direction, in the approval process for new multi-residential developments. There does not seem to be a specific policy in the OP on this.	See Section 3.3.5.1.a

3.2.5 (DP)	YROP policy 6.6.5 requires existing multi-unit residential buildings to provide convenient access to three-stream waste diversion programs and incorporate additional specialized programs where opportunities exist, such as batteries and electronic waste. There does not seem to be a specific policy in the OP on this.	See Section 3.3.5.1.g
3.3.2 (YRPH)	York Region Public Health recommends adding “food venues”.	See Section 3.4.2.1.a
3.3.3 (YRPH)	York Region Public Health recommends including supporting and enhancing access to healthy and locally grown food and agricultural products through a range of activities and amenities including investment in local distribution and reduction of food waste.	See Sections 3.4 and 5.4
3.4.3 (LRP)	Open space network connections to the Regional Greenlands system not addressed (reference Regional Official Plan policy 2.3.10e).	See Section 3.5.3.1.e
3.6.5.6 (LRP)	In addition to an archaeological assessment, this policy should also include ceasing work, securing the site, and notifying authorities (reference Regional Official Plan policy 2.4.13 h.)	See Section 3.7.5.1.g
3.6.5.7 (LRP)	This policy should be expanded beyond notification and documentation to engaging Indigenous communities on commemorative approaches (reference Regional Official Plan policy 2.4.13 a, ii).	See Section 3.7.5.1.j
3.6.5.13 (LRP)	It is unclear if this policy is referencing a local municipal or the Regional Archeological Management Plan.	Clarified to Town-wide
3.7.1 (DP)	YROP policy 4.3.27 encourages the development of a safe, desirable, and sustainable built environment in Employment Areas. There does not seem to be a specific policy in the OP on this.	See Section 3.8.2.1.t

3.7.1 (DP)	YROP policy 4.3.2.8 requires local municipalities to develop urban design guidelines as part of secondary plans or alternative comprehensive plans for new Employment Areas. There does not seem to be a specific policy in the OP on this.	See Section 3.8.2.1.u
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3.7.1 (DP)	YROP policy 4.3.30 requires local municipalities to include policies within local official plans and secondary plans for new Employment Areas, which address the interface between urban and agricultural land uses. There does not seem to be a specific policy in the OP on this.	See Section 3.8.2.1.t
3.7.4 (DP)	YROP policy 4.3.16 discourages expansions to existing uses in Employment Areas and should have regard for existing adjacent Employment Areas. There does not seem to be a specific policy in the OP on this.	See Section 3.8.5.1.e
3.7.4.7 (LRP)	The adopted Regional Official Plan included Appendix 4: Future Strategic Growth Areas, which was not approved by the Province. The approved Regional Official Plan does not include the provision of lands along Highway 404 for future strategic employment areas.	Policy Removed
Chapter 4 - The Natural Environment		
Chapter 4 (LRP)	The Whitchurch-Stouffville draft Plan schedules show Provincial Natural Heritage Systems but not the Regional Greenland System through the Hamlets, Towns and Villages. However, there are community specific maps that show environmentally significant areas. It is unclear how the local system connects to the regional system. Also, there are some components of the local Whitchurch-Stouffville system that are not identified in the draft local Official Plan that are shown in the Regional Official Plan.	The Regional Greenlands System will be included on Schedule A – Town Structure in the following iteration.
4.1.6.1 d) (LRP)	These structures should also be subject to Regional Greenland policies (reference Regional Official Plan policy 5.3.3 g).	See Section 4.1.4.1.d
4.1.16.13 (LRP)	This policy recognizes the natural linkage area as a component of Schedule B, however there is no complementary policy for natural core area. The preamble for 4.1.15 mentions the natural core area which should be embedded into policy.	There are separate sub-headers for linkage and natural core areas in the ORM in Section 4.1

Section 4.2.2 (LRP)	Policies about new developments achieving water efficiency and conservation do not address exceeding Ontario Building Code requirements (reference Regional Official Plan policy 2.3.35). In addition, a policy for public engagement/awareness on a changing climate missing with respect to water conservation (reference Regional Official Plan policy 2.3.38).	See Sections 4.3.2.8 and 4.3.2.9
4.2.4 (DP)	YROP policy 6.4.20 requires local municipalities to implement mandatory connection to municipal wastewater systems, where they exist, in vulnerable areas of a Wellhead Protection Area and/or Intake Protection Zone where individual on-site sewage systems have been identified as a significant drinking water threat. There does not seem to be a specific policy in the OP on this.	See Section 4.3.4.2
4.2.4 (DP)	YROP policy 6.4.28 states that applications for any land use, except low density residential, in Wellhead Protection Areas A, B, C and Intake Protection Zone 1 will require a Section 59 notice pursuant to the Clean Water Act, issued by the Risk Management Official. There does not seem to be a specific policy in the OP on this.	See Section 4.5.4.18
4.2.4 (DP)	YROP policy 6.4.29 states that applications for development and/or site alteration proposed within Wellhead Protection Areas A, B, C and Intake Protection Zone 1 as identified on Map 6 are subject to the provisions of the Credit Valley, Toronto and Region and Central Lake Ontario and South Georgina Bay Lake Simcoe Source Protection Plans and certain land use activities may be prohibited. There does not seem to be a specific policy in the OP on this.	See Section 4.5.4.19
4.2.4 (DP)	YROP policy 6.4.34 (a-e) identifies certain criteria that must be satisfied for proposed geothermal systems within Wellhead Protection Areas. There does not seem to be a specific policy in the OP on this.	See Section 4.5.4.20
4.3.1.13 (LRP)	Sub-policy c) does not include tools and strategies to mitigate and prevent (reference Regional Official Plan policy 2.3.32).	See Section 4.6.1.1.1.iii

4.3.2 (DP)	YROP policy 6.6.8 prohibits new waste disposal sites within the Regional Greenlands System as identified on Map 2. There does not seem to be a specific policy in the OP on this.	See Section 4.6.2.1.n
4.3.2.1, 4.3.2.2 (LRP)	<ul style="list-style-type: none"> • These policies are duplicated • Alignment with Regional Official Plan policy 5.5.21 regarding petroleum resources is required 	See 4.6.2.1.b
Chapter 5 - Agricultural System		
5.3.1.2 (LRP)	This policy does not address access to healthy or affordable local food (reference Regional Official Plan policy 5.1.20 b).	See Section 5.1.4.b
5.4.3.2 (YRPH)	York Region Public Health is requesting to review the indoor cannabis cultivation and outdoor cannabis cultivation Zoning By-law amendment subject to and in conformity with the other policies of this Plan.	Noted. For the OPA and ZBLA please visit: https://www.cometogetherws.ca/cannabis-study
5.4.3.3 (YRPH)	YRPH recommends adding “sensitive” after residential uses.	See 5.3.2.1.c.iii
5.4.5.1 (LRP)	<ul style="list-style-type: none"> • In addition to permitting these uses, provision for expansion of these uses should be included (reference Regional Official Plan policy 5.3.3) • Water quality and conservation should both be addressed. 	See Section 5.2.5.2
5.4.6.1 (LRP)	The use of the word ‘consider’ for new non-agricultural uses may be interpreted as too permissive for this policy. The intent is to limit new non-agricultural uses. Consider changing the first word to ‘Limit’.	See Section 5.2.6.1
5.4.6.2 d) (LRP)	What is the rationale for adding ‘unless expressly permitted’ in this policy? Especially given there are other policies dealing with lot creation in the Plan, this is not necessary.	See 5.2.6.2.d – Reference to has been removed
5.4.6.3 a) (LRP)	Policy wording referencing additional land and planning horizon should be amended to align with wording in Regional Official Plan policy 5.1.9 f) iii.	See 5.2.6.3.a

	<ul style="list-style-type: none"> • On Schedule M and in policies in Section 5.5, areas should be clear to distinguish the difference between the secondary aggregate resource areas and the aggregate resource areas and what policies apply to each individual area or both areas. • Encouraging extraction from locations within mineral aggregate areas is missing from this section • Extraction and processing that minimizes negative environmental, economic and social impacts not addressed (reference policy 5.5.11 in the Regional Official Plan) • Mineral aggregate resource conservation through recycling facilities not addressed (reference policy 5.5.13 and 5.5.14 in the Regional Official Plan) • Although there are several policies for rehabilitation, abandoned pits/quarries are not addressed (reference policy 5.5.15 in the Regional Official Plan). 	<p>Schedule M will be updated to distinguish secondary aggregate resource areas.</p> <p>See Section 5.3.1.6</p> <p>See Section 5.3.1.7</p> <p>See Section 5.3.1.8 and .9</p> <p>See Section 5.3.1.10</p>
Chapter 6: Land Use Strategy		
6.2.2.2 h (LRP)	This policy references Section 3.1.2 which should include a policy specifically referencing one additional residential unit within a primary residence in the Agricultural and Rural areas.	See 3.2.2.1.b outlines specifics for ORMCP
6.2.3.1 (LRP)	<ul style="list-style-type: none"> • Recreational, tourism, institutional (including cemetery), and resource-based commercial/industrial uses should be specified outside of the Regional Greenlands System (reference policy 5.3.2 a) in the Regional Official Plan) • Policy also needs to address on farm diversified uses and Agriculture related uses in the Greenbelt area • Permitted uses should be organized between what is permitted in the Greenbelt and what is permitted in the ORMCP • Add additional uses, in accordance with applicable Provincial Plans (reference policy 5.3.2 d) in the Regional Official Plan). 	<p>See Section 6.3.7.2</p> <p>See 6.3.6.1.r</p>
6.4.7, 6.4.8	Policy to address redevelopment, retrofitting, intensification and revitalization of major retail sites is missing (reference policy 2.3.54 in the Regional Official Plan).	See Section 6.5.20 and 6.5.23
6.5, 6.7, 6.8	Gormley, Vandorf and Musselman’s Lake are designated as hamlet in the Regional Official Plan. This should be reflected in the Whitchurch-Stouffville Official Plan policies and related schedules.	The Town's OP establishes a more detailed settlement hierarchy that reflects local circumstances, as such these settlements have been identified as Community Areas. Notwithstanding, the OP policies implement the ROP requirements with respect to the Hamlet policies of the ROP.

6.61.3 (YRPH)	York Region Public Health requests the following edits be made in the Official Plan: 6.6.1.3 Single detached dwellings as part of a plan of subdivision or on a lot created by consent shall only be permitted, subject to the servicing policies of this Plan, where it can be serviced in a manner approved by the Town, the Region of York, the Region of York's Medical Officer of Health , the Ministry of Environment, Conservation and Parks and Energy and the Ministry of Natural Resources with:	See 6.7.3.2
6.8.3.1a (LRP)	The policy includes 'Low-rise residential dwellings in the form of apartment buildings and mixed-use buildings;' Apartment buildings are not typically considered low-rise dwellings. This policy needs to be clarified.	See 6.9.7.1.a.ii – states max building height of 4 storeys
6.9.1.5 (LRP)	Hamlet policies do not contemplate growth occurring by way of plan of subdivision and keeping with the intent of limiting growth.	This policy should be maintained. The 'Hamlets' are unique in that there is substantial development opportunity particularly Vandorf and Gormley that should proceed on the basis of draft plans of subdivision to ensure appropriate development and conveyance of roads.
6.9.1.6 (LRP)	Add 'with no negative impacts' to this policy (reference policy 5.4.3 in the Regional Official Plan).	See Section 6.10.3.4
Chapter 7 - Implementation, Interpretation and Monitoring		
7.1.1.1 a. (DP)	YROP policy 4.4.24 (a-u) requires secondary plans or other equivalent comprehensive planning studies and/or development contemplated within strategic growth areas address specific criteria. The OP policy identifies conformity with local and Regional OPs. Please add the specific criteria identified in YROP policy 4.4.24 (a-u).	See Section 7.2.1.1
7.1.1.1 a. (DP)	YROP policy 4.4.50 (a-e) requires or other appropriate studies, local municipalities shall address the following criteria for Local Centres. The OP policy identifies conformity with local and Regional OPs. Please add the specific criteria identified in YROP policy 4.4.50 (a-e).	See Section 7.2.1.2

7.1.1.1 a. (DP)	YROP policy 4.4.53 (a-e) requires that development, secondary plans, or other appropriate studies in the Local Corridors address specific criteria. The OP policy identifies conformity with local and Regional OPs. Please add the specific criteria identified in YROP policy 4.4.53 (a-e).	See Section 7.2.1.3
7.1.1.1 a. (DP)	YROP policy 4.5.5 (a-e) requires that secondary plans within Towns and Villages, be subject to specific considerations. The OP policy identifies conformity with local and Regional OPs. Please add the specific criteria identified in YROP policy 4.5.5 (a-e).	See Section 7.2.1.4
7.1 and 7.2 (DP)	YROP policy 6.3.47 (a-c) requires local municipalities to include new local streets and shared private roadway systems in emerging infill areas within secondary, block and tertiary plans to consolidate access, minimize cul-de-sacs and supports emergency services. There does not seem to be a specific policy in the OP on this.	See Sections 7.2.1.5 and 7.3.1.8
7.5.2.1 b) ii) (LRP)	This sub-policy should include the opportunity for Indigenous communities to define interpretive and commemorative opportunities (reference policy 2.4.13 d) in the Regional Official Plan).	See Section 7.6.2.1.d
7.5.2.1 b) iii) (LRP)	Engagement with Indigenous communities on a stage 2 archeological assessment is encouraged with all new or re-development, not only Official Plan Amendments.	See Section 7.6.2.1.d
7.7 (LRP)	This section is missing the environmental and social costs of the comprehensive approach to financial management (reference policy 2.2.12 in the Regional Official Plan).	See Section 7.8.1.2
7.12 (DP)	YROP policy 7.3.16 states that local municipalities shall require that approvals of draft plans of subdivision include a lapsing date in accordance with Section 51(32) of the Planning Act. There does not seem to be a specific policy in the OP on this.	See Section 7.13.1.3
7.12.2 (LRP)	Consents for an agriculture-related used not permitted in the ORM is not addressed in this section (reference policy 5.2.7 in the Regional Official Plan).	See Section 7.13.2.1
7.12.2.1 a) (LRP)	This policy is a conformity issue with the ORMCP (reference policy 5.2.7 in the Regional Official Plan)	Policy removed.

7.12.2.1 b) (LRP)	Similar to policy 7.12.2.2. Suggest deleting 7.12.2.1 b) given policy 7.12.2.2 uses ORMCP wording and addresses the minimize size of new lot.	Policy Removed
7.12.3.1 c) (LRP)	This policy should include wording identifying that Agriculture-related uses should be small scale, directly related and required to be in close proximity to the farm operation (or identify in accordance with provisions of the Greenbelt Plan).	See Section 7.13.3.1.c
7.15.1.2 (YRPH)	York Region Public Health supports the development and implementation of a health lens, health supportive tools, and/or Health Impact Assessments to support the development of complete communities and as part of a complete application requirement. YRPH is requesting to be consulted in the development and implementation of health supportive tools. Consider including a definition of Health Impact Assessment.	Noted.
7.15.1.2 (YRPH)	YRPH supports the use of Health Impact Assessments. YRPH is requesting if more detail can be provided on which pre-application consultation circumstances would require the use of a Health Impact Assessment.	See 7.16.1.2. – Outlines applicable applications and is at discretion of Town
7.19 (DP)	<p>YROP policy 7.4.16 states: That where a local municipal zoning bylaw was amended prior to December 16, 2004 to specifically permit land use(s), the approval may continue to be recognized and any further applications required under the Planning Act or Condominium Act to implement the land use permitted by the zoning bylaw are not required to conform to the Greenbelt Plan. Applications to further amend the site-specific official plan or zoning bylaw permissions referred to above for uses similar to or more in conformity with the provisions of the Greenbelt Plan, 2017 are also permitted. All such applications should, where possible, seek to achieve or improve conformity with the Greenbelt Plan, 2017.</p> <p>There does not seem to be a specific policy in the OP on this.</p>	See Section 7.19.1.4
Definitions		
Archeological Assessment (LRP)	Remove the reference to ‘specialty crop areas’ and replace it with ‘assessment’.	Completed.

Draft Schedules		
All schedules that include hamlet designations (LRP)	Gormley, Vandorf and Musselman’s Lake are designated as hamlet in the Regional Official Plan. This should be reflected in the Whitchurch-Stouffville Official Plan policies and related schedules	The Town's OP establishes a more detailed settlement hierarchy that reflects local circumstances, as such these settlements have been identified as Community Areas.
Schedule O Transportation Planning	Schedule O – Transportation Plan 1. Given the Province has provided an MZO approval for the concession block bounded by a. 19th Avenue to the south, Stouffville Road to the north, McCowan Road to the west and Hwy 48 to the east, Schedule O of the Draft Official Plan shall be updated to show Urban Collector Roads or Potential Collector Roads through this concession block in both the b. east-west and north-south directions. 2. Furthermore, the Town shall identify proposed collector roads that continue to span a. across concession blocks south of Stouffville Road, that have identified Urban Areas in Schedule O. 3. The Official Plan shall identify potential collector road connections in all concession blocks south of Stouffville Road to the remaining lands in these blocks that share jurisdiction with the City of Markham.	The MESP related to the MZO areas is ongoing, and the identification of such roads may be included in the OP at such time as their location is finalized. The New Urban Areas will be subject to more detailed Secondary Plans and supporting Transportation Studies to determine the require road infrastructure, among other matters.
Schedule O (DP)	Schedule O – Transportation Plan 1. Regional roads widths identified in YROP-2022 ‘Map 11 – Street Network needs to be incorporated into the Town’s Transportation Plan. This will ensure land conveyances are secured along Regional roads, given changes to Regional Planning through Bill 23.	Completed
Schedule P Forestry	Schedule P - Active Transportation Plan 1. Please use the most up-to-date trail data for York Regional Forest properties, which is available through the YorkInfo Partnership. Some York Regional Forest trails are currently not shown on the map. It is also unclear what the distinction between multi-use trail and off-road hiking trail is. All trails within the York Regional Forest are considered multi-use; however, they are unpaved (aggregate or natural surface).	Will consider this as part of the next version.

New Figure (DP)	New Figure (Non-operative Schedule) It would be useful to include ‘Map 1 – Regional Structure’ from the YROP-2022 as a new Figure (non-operative) schedule in the Town’s OP. This will help contextualize the Town within the Regional landscape.	This additional Schedule is not needed and this has been noted in the ‘York Region OP’ Section of the Preamble.
Lake Simcoe Region Conservation Authority		
Table 4	We recommend that the VPZ/Minimum Buffer for Other Evaluated Wetlands (outside of Provincial Plan Area) “be determined by and EIS” rather than N/A.	Completed – See Table 4
4.3.1.14	Recommend adding the highlighted text: Require all new development, structures and site alteration within the Flood Plain Area...	Completed.
4.3.1.15	The text describes various natural hazards and refers to Table 4 for buffer/VPZ applicability. Table 4 only includes Wetland hazards.	Table 4 of the Town OP aligns with Table 3 of the ROP.
4.3.4.6	Environmental Core Area does not appear to be a designation. I believe this should read Significant Environmental Area	Completed – See Section 6.4
6.1.1.1	Recommend adding the highlighted text: ...areas susceptible to flooding and erosion hazards	See 6.2.1.1
Toronto and Region Conservation Authority (TRCA)		
Chapter 1: Reimagine Stouffville	Section 1.3.9 Please revise to state that the Conservation Authorities Act is administered by the Ministry of Natural Resources and Forestry as opposed to the Ministry of Environment Parks and Climate Change.	Completed – See Preamble
Section 2.7.1 (General Policies for Infrastructure):	Given the integrated role natural hazards and natural features play in protecting infrastructure, the General Policies for the Natural Heritage System (NHS) section could be included in this section – i.e., similar to the General Policies of the Agricultural System section	Noted/
Section 2.7.4 (Sustainable Infrastructure & Low Impact	Please consider ‘requiring’ applications to incorporate LID into the planning process. Further, we recommend the Town prepare a stormwater management (SWM) LID guide, providing information on Town approved LID approaches – preferably inclusive of Town-approved right-of-way designs that incorporate LIDs.	See Section 2.8.6.1.e

Section 2.7.6 (Stormwater Management): Policy 2.7.6.6 b) and Policy 2.7.6.8 h)	Both refer to "best efforts" which, in our experience, does not always result in this discretionary objective being fulfilled. We suggest requiring demonstration of site level water balance maintenance and no negative impacts to align with the feature-based water balance requirements under applicable regulation – i.e., that go beyond best a best efforts approach.	See Section 2.8.6.1.e – Removed ‘best efforts’
Section 2.7.6 (Stormwater Management): Policy 2.7.6.6 d)	Should be revised to, “...flooding on site and on the downstream watercourses.”	See Section 2.8.6.1.e.v
Section 2.7.6 (Stormwater Management): Policy 2.7.6.7 d)	Should be revised to, “within the receiving watercourse and wetlands and downstream reaches”.	See Section 2.8.6.1.f.iv
Section 2.7.6 (Stormwater Management)	Policy 2.7.6.7 should reference CA MESP guidelines.	See Section 2.10.6.1.a.iii
Section 2.7.6 (Stormwater Management)	Policy 2.7.6.8 c) should be revised to, “...within natural watercourses and wetlands. ”	See 2.11.6.1.h.iii
Section 2.7.6 (Stormwater Management):	Policy 2.7.6.8.p should include the watershed/sub-watershed perspective in the design of stormwater management.	See 2.11.6.1.h.xiv
Section 2.7.6 (Stormwater Management)	Policy 2.7.6.18 – We recommend that “coldwater” be removed as any maintenance or enhancement of baseflows would also have a hazard management component (e.g., erosion) that would be relevant to any thermal regime of a watercourse.	Removed.

Chapter 3: Planning for Complete Communities	TRCA staff appreciate the Town's efforts to incorporate our previous comments regarding additional residential units (ARU) in natural hazards. Upon review of our previous comment in the context of the draft text in the OP, we provide the following suggestion regarding policy 3.1.2.3, "Prohibit Additional Residential Units within natural hazards and, in areas rendered inaccessible to people and vehicles during times of flooding hazards and erosion hazards unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard.	See 3.2.3.1.d
4.1 (NHS):	We recommend noting that the Water Resource System (WRS), as discussed in Section 4.2, is a complementary system to the NHS and that the Town will utilize a systems-based approach to ensure the protection, restoration, enhancement of both the WRS and NHS.	See Section 4.1.1.2
Table 4:	As it relates to wetland protection and in the context of natural hazards, we suggest the minimum VPZ distances in Table 4 identify minimum distances for all setbacks to be determined by an Environmental Impact Study. In our experience, the absence of a minimum numerical distance suggests that any width could be applicable when there are specific minimum requirements in provincial plans and technical guidance. Further, Table 4 should include natural hazards, as referenced in Policy 4.3.1.15 and note that, where natural hazards overlap, the VPZ/buffer would extend from the furthest combined extent	Table 4 in the OP is consistent with Table 3 in the ROP.
Policy 4.1.7.3	Given the role woodlands play in supporting hazards, values of 0.2 ha and greater should not be applied as an opportunity to remove with a no negative impact test. There should be a separation of significant woodland and woodlands within the urban boundaries consistent with Policy 4.1.19	These recommendations came from the Town's NHRS Study which have been incorporated.
4.1.9 (Wetlands and Other Hydrologic Features)	This section should require the completion of a feature based water balance or budget to ensure that negative impacts to wetlands and hydrologic features are avoided or mitigated for.	See Section 4.1.4.1.h
4.1.9 (Wetlands and Other Hydrologic Features)	Unevaluated wetlands that would qualify as provincially significant wetlands should be treated as such. This would relieve the Town of the need to coordinate evaluations in difficult circumstances that span multiple landowners and where acquiring data could be difficult but provide the features with the protections and setbacks consistent with the policies of the OP. The determination of which wetlands qualify could be aided by consultation with the CAs who regulate these hazards.	See 4.3.1.2.e
Policy 4.1.18.3	Should recognize that other studies may be required to support an Environmental Impact Study such as a fluvial geomorphology study, erosion threshold study, arborist report etc.	See Section 4.1.17.1.c.xiv

4.1.24.3 (Regional Greenlands System)	We suggest Policy 4.1.24.3 e) be removed/ revised as to not permit recreational and parkland uses (including those specified, i.e., serviced playing fields and golf courses) within linear valleys.	Removed.
4.2.2 (Quality and Quantity of Groundwater and Surface Water, second paragraph)	Policy 4.2.2.4 - In addition to significant surface water contribution areas, we recommend also including identification of Ecologically Significant Groundwater Recharge Areas.	Completed.

<p>4.2.4 (Wellhead Protection Areas):</p>	<p>Policies 4.2.4.15 and 4.2.4.16 appear intended to reflect Parts 1 and 2 of the REC-1 policy of the CTC Source Protection Plan (SPP). However, the requirements of each part are distinct and, as written, the Town’s policies could misalign with REC-1 policy intent. For example, the intent is to prohibit (not permit) major development where an activity would be a significant drinking water threat, unless a hydrogeological study demonstrates maintenance of predevelopment water balance. Further, Part 2 does not apply to all major development, only that which is facilitated through site plan and subdivision applications for residential, commercial, and institutional uses. Requiring a water balance assessment for all applications to assess pre-to-post recharge maintenance could be an unnecessary burden. We suggest the following: 4.2.4.15 Permit Require site plan and subdivision applications to facilitate new major development for new residential, commercial, industrial and institutional uses (excluding single detached residential, barns and non-commercial structures that are accessory to an agricultural operation) in a Wellhead Protection Area-Q2 where the activity would be a significant drinking water threat, where it can be demonstrated to submit through the submission of a hydrogeological study demonstrating that the existing water balance can will be maintained through the use of best management practices such as Low Impact Development. Where pre- development recharge cannot be maintained on site, offsite compensation may be required. necessary, implementation and maximization of off site recharge enhancement within the same Wellhead Protection Area Q2 may be necessary to compensate for any predicted loss of recharge from the development. 4.2.4.16 Require new non-major development and site alteration in a Wellhead Protection Area Q2 to implement best management practices such as Low Impact Development with the goal to maintain predevelopment recharge rates for non major developments or site alterations in a Wellhead Protection Area Q2 assigned a moderate risk level; to the extent feasible. where the activity would be a significant drinking water threat are required.</p>	<p>See Sections 4.4.4.17 and 4.4.4.18</p>
<p>4.3.1 (Natural Hazards)</p>	<p>This section states, <i>“In some cases, these hazards are severe enough if development occurs on or adjacent to these lands will pose a risk to occupants of loss of life, property damage, and social disruption.”</i> We maintain that risk is present in each instance and suggest the following revision, <i>“Development on or adjacent to these lands increases risk to people, property and social disruption.”</i> Further, in the preceding sentence, we suggest saying, <i>“...erosion susceptibility, slope instability, and other physical conditions.”</i> Similarly, Policy 4.3.1.7 b) should also specify slope hazards, i.e., <i>“...during times of flooding hazards, erosion and slope hazards...”</i></p>	<p>Completed.</p>

Policy 4.3.1.12	Should prohibit lot creation and intensification in hazardous lands. We also suggest the Town consider adding a policy in accordance with York Region OP policy 3.5.8 which directs local municipalities to partner with CAs to identify remediation and mitigation opportunities for hazardous lands.	Completed.
Policy 4.3.1.14	Should be revised to say, “ <i>Require all new development and site alteration...</i> ”as development includes structures and site alteration within the flood plain is also subject to CA approval. Similarly, Policy 4.3.4.3 should be revised to replace structures with site alteration as well.	Completed.
Policy 4.3.1.15	States that the setback, buffer, or minimum vegetation protection zone from a natural hazard...will be in accordance with Table 4 and shall be to the satisfaction of the Town and CA. However, Table 4 does not currently speak directly to natural hazards, which it should.	Table 4 in the OP is consistent with Table 3 in the ROP.
4.3.4 (Flood Plain Area – Overlay)	A hazard need not necessarily be mapped to be regulated by a CA. We suggest revising as follows, “ <i>The policies in this section apply to lands adjacent to within the vicinity of valley and stream systems in the Community of Stouffville that have been mapped identified by the Conservation Authority as being impacted by flooding and/or erosion hazards, and to the extent possible these areas have been designated as “Flood Plain Area” on Schedule D1...</i> ”	Completed.
Policy 4.3.4.4	It is unclear why this Policy has been included as we understand that a provincially designated Special Policy Area (SPA) has not been approved within the Town’s jurisdiction. While this policy is open-ended, i.e., an SPA <i>may</i> be applied...”, we request clarification as to why it has been included. TRCA staff request to be engaged by the Town to clarify the rationale behind the potential inclusion of SPA policies and any related intention to seek provincial designation of an SPA.	Policy removed.
Policy 4.3.4.6 a)	The reference to the Environmental Core Area designation may be out of place if there are no Environmental Core Area permissions.	Removed.

<p>Policy 4.3.4.6 b)</p>	<p>Remediation of the flood plain should be required to remove the area from the flood plain (e.g., in the case of spills). We suggest revising as follows,</p> <p>a) Flood Fringe: The zoning of the lands in the flood fringe may utilize a holding zone to provide direction as to future permitted uses and to ensure that conditions of flood plain remediation, flood proofing and safe access are met prior to development. The Zoning By-law may be amended to remove the holding symbol when the requirements of the Conservation Authority with respect to flood plain remediation, flood proofing and the provision of safe access to the proposed development, have been satisfied.</p>	<p>Section no longer in OP.</p>
<p>6.1 (Permitted Uses in All Land Use Designations)</p>	<p>Group homes and additional residential units should not be permitted within hazardous lands or where there is no safe access. As such, we suggest revising this to, "...areas susceptible to natural hazards flooding ...". Note, alternatively flooding or erosion hazards could be included.</p>	<p>See 6.2.1.1.b</p>
<p>Schedule A</p>	<p>Town Structure: we recommend including the full WRS to Schedule A (key hydrologic areas as well as features) as a complementary system to NHS. Key hydrologic areas include Significant Surface Water Contribution Areas, Ecologically Significant Groundwater Recharge Areas, Significant Groundwater Recharge Areas, and Highly Vulnerable Aquifers. TRCA's 2022 WRS mapping identifies both key hydrologic features and areas.</p>	<p>Schedule A – Town Structure does not include WRS and therefore will not be part of this Schedule Please see K-series Schedules</p>
<p>Schedule K-1a to K-10a:</p>	<p>There is potential to incorporate TRCA's 2022 WRS mapping (including Key Hydrologic Areas as well as Key Hydrologic Features).</p>	<p>Noted</p>
<p>Floodplain mapping (multiple Schedules)</p>	<p>It appears that the floodplain mapping shown in the Schedules does not reflect TRCA's most up-to-date floodplain mapping. We recommend that this be reviewed and updated accordingly to reflect TRCA's latest mapping information, which we can provide to the Town upon request. Additionally, we suggest replacing "Regional floodline" with "Regulatory" given that in some areas the 100-year flood may be greater.</p>	<p>Floodplain mapping has been updated to reflect TRCA's most current mapping.</p>

York Catholic District School Board

<p>Schedule D – Stouffville Land Use Designations, proposed school site location symbols</p>	<p>The YCDSB has designated two elementary school sites within the Urban Area of the Community of Stouffville, one located in the south-east of the town and a second site located in the north-east. Board staff support the addition of “proposed school” site location symbols within Schedule D of the Draft OP but note that the Board’s north-east school site is not identified. As such, Board staff request that Schedule D of the Draft OP is revised to show this site. Board staff note that the location of the symbol illustrating the YCDSB school currently under construction in the Savena Cove subdivision is in the wrong location. The symbol should be shifted slightly to the south, to align with its location at the south-east corner of Meridian Drive and Ninth Line.</p>	<p>Completed</p>
<p>New Urban Areas</p>	<p>The YCDSB has a third designated school site located just outside of the Community of Stouffville, on the west side of Highway 48 within the area designated as “New Urban Area.” While the school site is not shown within Schedule C of the Draft OP, Board staff are generally satisfied with the proposed policy language around the provision of school sites within New Urban Areas, with one requested revision, as noted below:</p> <p>As schools may contain day care centres, Board staff request that Section 2.4.6.3(e)(i) be revised to:</p> <p>“Incorporates an adequate provision of local municipal community services such as libraries, schools and day care centres.”</p>	
<p align="center">Metrolinx</p>		
<p>Schedule D</p>	<p>Schedule D: As the Old Elm MTSA approvals proceed, Metrolinx requests confirmation of the final delineation of the MTSA and land use designations.</p>	<p>OPA 155 has been adopted by Town Council which delineates the MTSA (as per the approved ROP), and associated land use designations implemented</p>

<p>Schedule D-1</p>	<p>Schedule D-1: Metrolinx encourages consideration for the highest density land use category in the immediate vicinity of the Stouffville GO Station. Metrolinx owned-lands (PINs 037130339, 037130334, and 037130332) are currently proposed to be designated as Core Area – Mixed Use and Metrolinx recommends that they be redesignated as Urban High Density Residential Area. Flexible high density land uses create the conditions for future transit-oriented development that unlocks station integration and the delivery of transit requirements.</p>	<p>The majority of forecasted population growth and population– related employment growth will be directed to the Community of Stouffville through intensification and directed to the MTSA’s and Strategic Growth Areas including the Stouffville GO MTSA.</p> <p>The Core Area Mixed Use designation is appropriate for the Stouffville GO station and surrounding lands, which has been revised to permit more density and taller buildings than what is currently provided for. The designation requires a mix of residential and commercial/office uses which are appropriate for lands in proximity to Main Street, while balancing the planned character and transition of development with the surrounding heritage character areas. The policies support the future redevelopment of transit oriented development on the subject lands.</p>
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<p>Policy 6.4.12.1.bb</p>	<p>Policy 6.4.12.1.bb: Metrolinx has been working on incorporating amenities and small businesses within station buildings and Metrolinx-owned lands. We would like to ensure the permitted uses are flexible enough to accommodate emerging uses such as vending machines, mobile retail/food-and-beverage, mobile lockers, and temporary pop-up events. We see this as an opportunity to support local/small businesses and expand the use of the lands beyond transportation infrastructure.</p>	<p>These emerging uses will not be specified in an Official Plan as they are mobile/temporary and would be more appropriately characterized in a Zoning By-law. There is nothing in the Official Plan that would preclude these uses and amenities from being accommodated.</p>
<p>Policy 6.4.12.2.h.:</p>	<p>Policy 6.4.12.2.h.: Metrolinx requests clarification in terms of which GO Station is being referenced. Metrolinx encourages further consultation on intensification plans for the area immediately around GO Station facilities. Any redevelopment of Metrolinx-owned lands or integrated development scheme is subject to the Ontario Realty Directive</p>	<p>The Official Plan has been updated to clarify this policy is referring to the Stouffville GO Station</p>
<p>Policy 2.2.2.3</p>	<p>Policy 2.2.2.3: Metrolinx requests that the definition of affordable housing be clarified.</p>	<p>Please see the definition included in the OP which outlines parameters for what constitutes ‘affordable’ housing. The definition is consistent with the ROP.</p>
	<p>Comments on schedules and policies. Provided update that Stations Planning team at Metrolinx is conducting series of internal conceptual studies, “Station Master Plans” (SMPs) which includes Stouffville GO. Town staff will be contacted for participation in engagement sessions.</p>	<p>Noted</p>

Bell Canada

	<p>Bell Canada is most interested in changes to the transportation network and/or policies and regulations relating to the direction of growth and public infrastructure investments, heritage character, urban design, broadband and economic development related objectives and how Bell can assist Whitchurch-Stouffville to be a connected community. We have reviewed the Official Plan Draft, and would like to commend the community for their support as per Section 1.2.1.2 of the Town-Wide Guiding Principles to achieving and upholding the community vision.</p> <p>Bell is particularly interested in supporting the Town’s recognition of the importance of having access to fast, reliable internet service as a fundamental aspect of attracting business, supporting farmers, and fostering an entrepreneurial spirit in the Town. As per Sections 2.8.6.10 and 2.8.6.12, Bell looks forward to a partnership and collaboration to provide advanced telecommunications to attract knowledge-based industries and support the growth of existing businesses.</p> <p>Bell Canada understands the Town’s desire to support high quality urban design through built form to enhance the appearance and livability of its urban areas. We strive to minimize the impact of our infrastructure, however with the evolving nature of telecommunication/communication technology it is not always possible for a number of reasons, for example, the way the infrastructure is intended to be serviced in emergency situations. We appreciate the opportunity to work with the Town to find solutions that align as much as possible with the municipality’s urban design interests in principle, where feasible</p>	Noted.
Parkland Dedication	<p>Having reviewed the draft, Bell would like to receive some clarification on the intent of Section 3.4.1.13 (e) in particular as this could have significant negative cost implications to the provisioning of fiber to the Town. Secondly, although Bell does attempt to avoid land use conflict, this is not possible at all times. Bell would like to suggest a minor edit/addition to Section 3.4.1.29 as follows: Prohibit utility easements to be located on tableland parkland unless the Town is satisfied that they do not negatively impact the programmed use of the public parkland.</p>	Section 2.5.1.1.m.v has been updated per the requested modifications

Future Involvement	We would like to thank you again for the opportunity to comment, and commend the community in their support of the deployment of telecommunications and broadband infrastructure in Whitchurch-Stouffville and would request that Bell continue to be circulated on any future materials and/or decisions released by the Town in relation this initiative.	Noted
	Secondly, although Bell does attempt to avoid land use conflict, this is not possible at all times. Bell would like to suggest a minor edit/addition to Section 3.4.1.29 as follows: <u>Prohibit utility easements to be located on tableland parkland unless the Town is satisfied that they do not negatively impact the programmed use of the public parkland.</u>	The following will be added to the Second Draft Official Plan (Section 3.4.1.29) of the Official Plan: “Prohibit utility easements to be located on tableland parkland unless the Town is satisfied that they do not negatively impact the programmed use of the public park”.
Rogers		
	No comments	
Enbridge		
	No comments.	