

# The Planning Partnership

Urban Design, Landscape Architecture, Planning, Communications

## MEMORANDUM

**To:** Town of Midland  
**From:** The Planning Partnership  
**Date:** March 15, 2018  
**Subject:** DRAFT – Review of the 2017 Growth Plan and Implications for Midland’s new Official Plan

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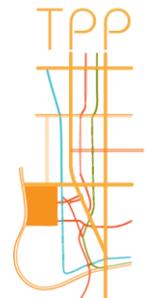
The 2017 Growth Plan for the Greater Golden Horseshoe (2017 Growth Plan), which came into effect on July 1 2017, introduces a new provincial policy framework to guide planning decisions. Planning decisions, including the future approval of Midland’s new Official Plan, must be in conformity with this Plan. As Midland’s new Official Plan was drafted prior to the release of the 2017 Growth Plan, revisions to the draft document will be required.

However, Midland’s Official Plan must also be in conformity with Simcoe County’s Official Plan, which was approved by the OMB at the end of 2016, and which therefore precedes the 2017 Growth Plan changes. In particular, the County Official Plan does not reflect the updated growth management policies with respect to intensification and greenfield density targets, as well as the requirement for a number of comprehensive studies to guide future planning decisions. As a result, Simcoe County will be going through its own Municipal Comprehensive Review process to bring its Official Plan into conformity with the 2017 Growth Plan over the next two to three years.

To guide lower-tier municipalities which are currently going through their Official Plan Review processes (to 2031), the County has produced a “Conformity Checklist” which outlines those policies of the 2017 Growth Plan that lower-tier municipalities do not have to address during the current conformity exercises. These identified policies either must first be implemented by the County through its Municipal Comprehensive Review, will be implemented by the Province, or are subject to further guidance/information from the Province. These policies therefore do not need to be considered for Midland’s current new Official Plan, and will be addressed when Midland updates its Official Plan to bring it into conformity with Simcoe County’s Official Plan when it has been brought into full conformity with the 2017 Growth Plan.

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As a result of the above, Midland may proceed by way of conforming to the 2017 Growth Plan ‘to the extent possible’, while also being in conformity with the current County Official Plan. Therefore some areas, such as intensification and density targets, will not be updated to the current 2017 Growth Plan levels at this time.

The discussion below outlines the key areas where the 2017 Growth Plan policies will require revisions to Midland’s new Official Plan to ensure conformity “to the extent possible”, organized by 2017 Growth Plan chapter. These revisions are also summarized in a table included as an attachment to this memorandum.

This memorandum only addresses those policies which are relevant to the Town of Midland.

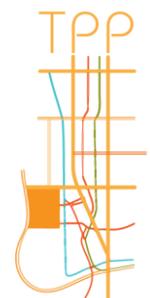
## **General**

A significant number of terminology and definition changes were introduced in the 2017 Growth Plan. It will be necessary to review the entire Plan and ensure that all terms are revised to reflect these changes. While a significant shift in terminology has occurred with the 2017 Growth Plan, it is recommended that the current approach of referring readers to the County Official Plan and applicable Provincial documents for relevant definitions be maintained. This ensures that the amount of duplication with upper level plans is minimized and reduces the complexity of the upkeep of Midland’s Official Plan, should any of the definitions be revised by the County or Province.

Considering that the County is currently undertaking a Municipal Comprehensive Review which will result in numerous significant policy updates and introduce new policy frameworks, and that Midland would then have to review and update its Official Plan accordingly, Midland should consider including a section or policy identifying this study, its components and the implications. This will provide a ‘heads up’ that additional changes will be coming soon.

## **2.0 Where and How to Grow**

Chapter 2.0 addresses the key growth management topics, including the structure of delineated built-up areas, urban growth centres, transit corridors and station areas, designated greenfield areas and rural areas. Considering that Midland’s settlement area boundary is aligned with its municipal boundary and that significant growth management matters are the responsibility of the County, the key policies which may require revisions to Midland’s new Official Plan are generally limited to those addressing employment uses and housing. It should be noted however, that the ongoing obligation to plan for the forecasted and allocated population and employment growth to 2031 will require that Midland’s new Official Plan continue to address growth management matters at this time, including focusing growth in delineated built up areas, strategic growth areas and areas with existing or planned transit and community service facilities, and otherwise in accordance with the existing County Official Plan.



Additionally, under the requirement for a strategy to achieve the minimum intensification target (which was an existing policy), there is a new requirement to:

- *Prioritize planning and investment in infrastructure and public service facilities that will support intensification (2.2.2.4.e).*

Notwithstanding the above, the 2017 Growth Plan also provides stronger guidance with respect to the achievement of complete communities (2.2.1.4), including: diverse uses, improved quality of life and social equity, a range of housing options, convenient access to transportation networks, trails/open space and healthy food, high quality built form and public realm, climate change mitigation and resiliency and the integration of green infrastructure/low impact development. While many of these elements are already included in the policies of Midland's new Official Plan, it will be important to ensure that their language and policy strength properly reflect the intent of the 2017 Growth Plan.

The 2017 Growth Plan expands on the policies addressing 'Employment', and introduces the following requirements:

- *Economic development and competitiveness in the GGH will be promoted by:*
  - *Making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;*
  - *Planning to better connect areas with high employment densities to transit; and*
  - *Integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment (2.2.5.1.a)c)d).*
- *Retail and office uses will be directed to locations that support active transportation and have existing or planned transit (2.2.5.3).*
- *In planning for employment, surface parking will be minimized and the development of active transportation networks and transit-supportive built form will be facilitated (2.2.5.4).*
- *Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will each develop an employment strategy that:*
  - *Establishes a minimum density target for all employment areas, measured in jobs per hectare, that reflects the current and anticipated type and scale of employment that characterizes the employment areas and aligns with policy 2.2.5.1;*
  - *Identifies opportunities for the intensification of employment areas on sites that support active transportation and are served by existing or planned transit; and*



- Will be implemented through a municipal comprehensive review, including official plan policies and designations and zoning by-laws (2.2.5.5.).

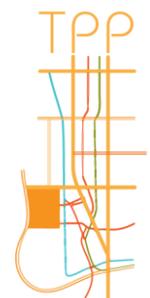
Midland will need to review and update its Official Plan based on the County Employment Strategy, once it has been completed.

- Municipalities will plan for all employment areas within settlement areas, with the exception of any prime employment areas, by:
  - Prohibiting residential uses and limiting other sensitive land uses that are not ancillary to the primary employment use;
  - Prohibiting major retail uses or establishing a size or scale threshold for any major retail uses that are permitted and prohibit any major retail uses that would exceed that threshold; and
  - Integrating employment areas with adjacent non-employment areas and developing vibrant, mixed-use areas and innovation hubs, where appropriate (2.2.5.7.).
- The retail sector will be supported by promoting compact built form and intensification of retail and service uses and areas and encouraging the integration of those uses with other land uses to support the achievement of complete communities (2.2.5.12.).

The above policies will not require significant revisions to Midland’s new Official Plan, but rather minor refinements to further emphasize the role of active transportation and transit in employment and commercial areas, as well as promoting further intensification of such uses. The 2017 Growth Plan also introduced more specific policies for the planning of employment areas such as protections from non-compatible uses. Midland’s new Official Plan already conforms to these requirements, with the exception of adding more specific language regarding the integration of employment areas with adjacent areas, where appropriate.

The 2017 Growth Plan now prohibits the conversion of employment areas to non-employment uses, except through a municipal comprehensive review undertaken by the upper tier municipality. It is important to note that while Midland’s new Official Plan includes the reclassification of some lands from “Employment Areas” to “Commercial Corridor”, this does not constitute an employment area conversion as envisioned by the 2017 Growth Plan. As the existing “Employment Areas” designation was used by the Town for all employment and commercial land not located within the traditional downtown area, those lands that will be reclassified “Commercial Corridor” always contained, or were intended to be developed with commercial uses.

New housing policies are limited in their applicability to Midland’s context, but the following must be included in Midland’s new Official Plan:



- To support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes (2.2.6.3.).
- Municipalities will maintain at all times where development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units. This supply will include, and may exclusively consist of, lands suitably zoned for intensification and redevelopment (2.2.6.4.).

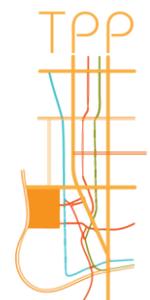
### 3.0 Infrastructure to Support Growth

Chapter 3.0 of the 2017 Growth Plan added significantly more emphasis to the integrated approach of land use and infrastructure planning, including expanding the responsibilities of Simcoe County in undertaking comprehensive plans to support this approach. There is also significantly more direction with respect to addressing the impacts of climate change and the consideration of stormwater management. Further, there is now stronger direction in supporting the viability of alternative modes of transportation to reduce the reliance on the automobile.

Key policies that need to be reflected in Midland's new Official Plan include:

- *Planning for new or expanded infrastructure will occur in an integrated manner, including evaluations of long-range scenario-based land use planning and financial planning, and will be supported by infrastructure master plans, asset management plans, community energy plans, watershed planning, environmental assessments, and other relevant studies where appropriate, and should involve:*
  - Leveraging infrastructure investment to direct growth and development in accordance with the policies and schedules of this Plan, including the achievement of the minimum intensification and density targets in this Plan;*
  - Providing sufficient infrastructure capacity in strategic growth areas;*
  - Identifying the full life cycle costs of infrastructure and developing options to pay for these costs over the long-term; and*
  - Considering the impacts of a changing climate (3.2.1.2.).*
- *Municipalities will assess infrastructure risks and vulnerabilities, including those caused by the impacts of a changing climate, and identify actions and investments to address these challenges, which could be identified as part of municipal asset management planning (3.2.1.4.).*

The above policies will require that Midland's new Official Plan be revised to better reflect the role that water and waste water servicing should play in supporting intensification and directing development to



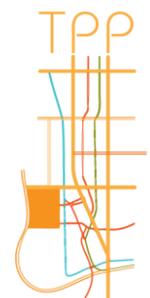
strategic growth areas. In particular, it will be critical that the Urban Service Area is well defined, and that the comprehensive studies identified in the 2017 Growth as required for expanded infrastructure are clearly outlined in Midland's new Official Plan. This is applicable to a number of areas in the Town, such as the Balm Beach Road area.

The new Official Plan already recognizes the need to consider the impacts of climate change with respect to infrastructure, however stronger and more comprehensive policies will be required to conform with the intent of the 2017 Growth Plan. Additional policy language could include stronger requirements to assess the risks and impacts of climate change on municipal infrastructure and providing mitigation strategies, stronger support for active transportation and the provision of related infrastructure, requirements for resource conservation and the integration of low impact development and green infrastructure.

- *In the design, refurbishment, or reconstruction of the existing and planned street network, a complete streets approach will be adopted that ensures the needs and safety of all road users are considered and appropriately accommodated (3.2.2.3.).*
- *Municipalities will work with transit operators, the Province, Metrolinx where applicable, and each other to support transit service integration within and across municipal boundaries (3.2.3.3.).*

While Midland's new Official Plan addresses complete streets, the specific language may need to be revised to better reflect the stronger wording of the 2017 Growth Plan. A new policy will need to be added regarding inter-municipal and inter-agency co-operation for cross-border transit, in the context of the shared bus service with Penetanguishene and the future County Transit service which is planned to connect to Midland.

- *Municipal water and wastewater systems and private communal water and wastewater systems will be planned, designed, constructed or expanded in accordance with the following:*
  - *A comprehensive water or wastewater master plan or equivalent, informed by watershed planning (...) (3.2.6.2.c)*
- *Proposals for large-scale development proceeding by way of a secondary plan, plan of subdivision and vacant land plan of condominium or site plan will be supported by a stormwater management plan or equivalent, that:*
  - *Is informed by a subwatershed plan or equivalent;*
  - *Incorporates an integrated treatment approach to minimize stormwater flows and reliance on stormwater ponds, which includes appropriate low impact development and green infrastructure;*



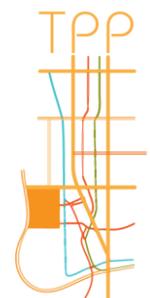
- *Establishes planning, design, and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion, and impervious surfaces; and*
- *Aligns with the stormwater master plan for the settlement area, where applicable (3.2.7.2.).*

Additional policy language must be added to Midland's new Official Plan regarding the need for comprehensive water and wastewater master plans. These plans should include recommendations for a servicing strategy for the remaining lands in Midland which are designated for development but which are outside of the Urban Service Area.

While the requirement for a stormwater management plan for major development is already included, the policies should be updated to better reflect the consideration of large-scale subwatershed and settlement area stormwater management plans which will be undertaken in cooperation with the County, and for which additional direction has been provided by the Province. In this regard, Section 6.0 of Midland's new Official Plan will require a general review to ensure that the policy language reflects the County's new responsibilities with undertaking comprehensive studies and linking growth management and infrastructure planning.

- *Planning for public service facilities, land use planning and investment in public service facilities will be co-ordinated to implement this Plan.*
- *Public service facilities and public services should be co-located in community hubs and integrated to promote cost-effectiveness.*
- *Priority should be given to maintaining and adapting existing public service facilities and spaces as community hubs to meet the needs of the community and optimize the long-term viability of public investments.*
- *Existing public service facilities that are located in or near strategic growth areas and are easily accessible by active transportation and transit, where that service is available, should be the preferred location for community hubs.*
- *Municipalities will collaborate and consult with service planning, funding, and delivery sectors to facilitate the co-ordination and planning of community hubs and other public service facilities.*
- *New public service facilities, including hospitals and schools, should be located in settlement areas and preference should be given to sites that are easily accessible by active transportation and transit, where that service is available (3.2.8).*

Generally, the intent of the above policies is reflected in Midland's new Official Plan in subsection 3.1.14. However, some additional detail should be added, including giving priority to maintaining existing public service facilities and locating new facilities in or near strategic growth areas, and the terminology must be



updated. In particular, the currently permissive language of this policy subsection must also be strengthened to ensure conformity.

#### **4.0 Protecting What is Valuable**

Chapter 4.0 of the 2017 Growth Plan includes much more detailed policies addressing the natural heritage system than the previous Growth Plan. However, many of the policies relate to the Province's mapping of a Natural Heritage System for the Greater Golden Horseshoe, which excludes lands within settlement areas. As all of Midland is a defined settlement area, the policies relating to the provincial Natural Heritage System do not apply.

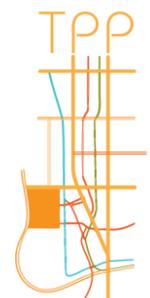
The other Growth Plan policies with respect to protecting what is valuable to be considered in revisions to Midland's new Official Plan include the following:

- *Beyond the Natural Heritage System, including within settlement areas, the municipality:*
  - *will continue to protect any other natural heritage features in a manner that is consistent with the PPS; and*
  - *may continue to protect any other natural heritage system or identify new systems in a manner that is consistent with the PPS (4.2.2.6).*
- *Development or site alteration is not permitted in the vegetation protection zone (...) (4.2.4.3)*

Considering that Midland's natural heritage system was developed in accordance with the PPS, these policies are already achieved. It is important to note that significant revisions to Section 4.5.3: Natural Heritage Designation were completed as part of Phase 1 of the "Expanded OPR Scope", which remain in conformity with the PPS. As part of the preparation of the next draft of Midland's new Official Plan, this revised section will need to be inserted and the required schedule updates implemented; the previously prepared Source Protection policies and mapping will also be incorporated in the next draft.

Chapter 4.0 also includes policies addressing cultural heritage resources, mineral aggregate resources, conservation and climate change. The key policies for Midland to consider are as follows:

- *Cultural heritage resources will be conserved to foster a sense of place and benefit communities, particularly in strategic growth areas.*
- *Municipalities will work with stakeholders as well as the First nations and Metis communities, in developing and implementing Official Plan policies and strategies for the identification, wise use and management of cultural heritage resources.*



- *Municipalities are encouraged to prepare archaeological management plans and municipal cultural plans and consider them in their decision-making (4.2.7).*

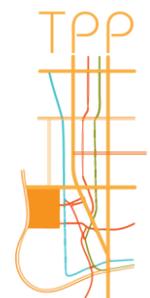
The above cultural heritage policies are largely included in Midland's new Official Plan, although it may be advisable to specifically state the link to fostering a sense of place in strategic growth areas. To be consistent with the terminology introduced in this new section of the Growth Plan, the policies related to the preparation of a heritage master plan and an archaeological master plan should be revised and consideration be given to Midland preparing the later, rather than only supporting the County.

- Establishes requirements for the rehabilitation of new mineral aggregate operation sites, including with respect to ecological value, health or key natural heritage or hydrologic features, aquatic enhancement, and reflecting the long-term land use of the general area and applicable policies.

The requirement for a rehabilitation plan is already included in Midland's new Official Plan, although more detail on what should be included could be considered.

- *Municipalities will develop and implement Official Plan policies and other strategies in support of the following conservation objectives:*
  - *energy conservation for existing buildings and planned developments, including municipally owned facilities, including through:*
    1. *identification of opportunities for conservation, energy efficiency and demand management, as well as district energy generation, renewable energy systems and alternative energy systems and distribution through community, municipal and regional energy planning processes, and in the development of conservation and demand management plans (4.2.9.1.b)i);*
- *Municipalities should develop excess soil reuse strategies as part of planning for growth and development (4.2.9.2).*
- *Municipal planning policies and relevant development proposals will incorporate best practices for the management of excess soil generated and fill received during development or site alteration, including infrastructure development (...) (4.2.9.3).*
- *Municipalities are encouraged to reduce greenhouse gas emissions and address the impacts of climate change through developing greenhouse gas inventories and establishing municipal interim and long-term greenhouse gas emission reduction targets.*

Midland's new Official Pan contains policies that promote energy conservation and encourage the mitigation of climate change impacts in a number of sections. However, the 2017 Growth Plan directs that more emphasis be placed on district energy and other alternative energy systems, as well as encourages



more quantitative methods for tracking greenhouse gas emissions and targets. The 2017 Growth Plan further introduces the idea of soil reuse strategies which incorporate best management practices.

The 2017 Growth Plan also directs the County to prepare a comprehensive policy framework aligned with the Ontario Climate Change Strategy, 2015 and the Climate Change Action Plan, 2016. It would therefore be advisable to include a reference to this upcoming policy framework and identify that Midland's Official Plan would have to be updated to incorporate it, when completed.

## 6.0 Simcoe Sub-area

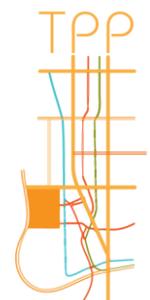
A key change in Chapter 6.0 of relevance to Midland's new Official Plan is the elimination of the "Lands for Urban Uses" and "Lands Not for Urban Uses" labels, which formerly defined where urban development could occur within settlement areas. In its place, the following policy is included in the 2017 Growth Plan:

- *Any lands that are designated for agricultural uses or rural uses in a lower-tier Official Plan as of January 20, 2017 can only be designated for development through a municipal comprehensive review and subject to the policies in subsection 2.2.8 (6.3.5).*

Subsection 2.2.8 address settlement area boundary expansions, which are only permitted through a County municipal comprehensive review. Therefore, it would appear to indicate that the lands in Midland which are designated in the existing Official Plan as "Restricted Rural" could not be redesignated for development prior to the completion of the County's municipal comprehensive review.

The above would appear to impact Midland's two Secondary Plan areas, which are currently designated "Restricted Rural", and which are proposed to be designated for development (subject to the completion of the secondary plans) in Midland's new Official Plan. However, over the course of the appeal process for Simcoe County's current Official Plan, the Town of Midland, Simcoe County and the Province came to the agreement that Midland's Secondary Plan areas were 'urban' (Lands for Urban Use). This was supported by the fact that the entirety of the Town was identified as a Settlement Area in the previous County Official Plan and that the requirement for a Secondary Plan served to manage the orderly and efficient expansion of urban development. As such, the Secondary Plan areas should not be impacted by the 2017 Growth Plan policy 6.3.5 and a municipal comprehensive review should not be required to redesignate these lands.

The lands included in Midland's new Official Plan as "Lands Not for Urban Uses" currently have a policy framework which does not permit urban development and recognizes that they are not appropriate for urban forms of development in the near future. The Town should consider providing further clarification with respect to the implications of the 2017 Growth Plan for these non-'urban' lands. For instance, while a County municipal comprehensive review would be required for redesignation, it does not appear that a County Official Plan Amendment and Provincial Approval would be required.



While the “Lands for Urban Uses” and “Lands Not for Urban Uses” labels are no longer included in the 2017 Growth Plan, Midland could continue to use these terms as a means of local growth management, a previously County and Provincially-approved approach.

### **Midland’s Schedules**

It should be noted that in addition to the revisions noted below, the Natural Heritage System mapping will be updated as a result of the work completed during the Fall 2017 for Phase 1 of the “Extended OPR Scope”.

#### Schedule “A”

Schedule A should be revised to better link to the 2017 Growth Plan terminology and growth management approaches. This would include identifying Strategic Growth Areas (which would likely include the same areas identified as Intensification District on Schedule B), the Delineated Built Boundary (updated terminology) and the settlement area boundary (consistent with the already identified municipal boundary).

As mentioned earlier, while “Lands for Urban Uses” and “Lands Not for Urban Uses” are no longer 2017 Growth Plan terms, these terms can still play a useful role as a local growth management tool. These terms can continue to differentiate between those lands which are considered ‘urban’ and those lands which are not, and would therefore require a County municipal comprehensive review to redesignate.

#### Schedule “B”

Schedule B would continue in its role as the “Urban Structure”. To better reflect this role, consideration should be given to revising the term “Intensification District” to “Mixed Use Districts”. Further, the Built Boundary may not be necessary on this schedule, as it is included on Schedule A to directly address the 2017 Growth Plan requirements. The “Existing Development Approvals” will be shifted to Schedule C

#### Schedule “C”

Other than the addition of “Existing Development Approvals”, no major revisions are necessary, although minor revisions to improve the readability of the schedule, such as the colours, may be considered.

#### Schedule “C1”

No major revisions, although minor revisions to improve readability may be considered.

#### Schedule “D”

No major revisions.

#### Schedule “E”



No major revisions.

Schedule "F"

Considering the increased importance of the Urban Service Area, the Town is working to provide more detailed mapping of its coverage, to be used in further updates to this schedule.

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## Attachment 1: Summary of Policy Changes

### 2.0 Where and How to Grow

New/Changed 2017 GP Policy	Existing Draft OP Policy	Required Changes
County's Municipal Comprehensive Review	Growth Management Section	Indicate in Midland's Official Plan that the County is currently undertaking a municipal comprehensive review, and that when complete, Midland will have to go through another review and update of its Official Plan to plan for and accommodate the allocated growth for 2031 to 2014 and to incorporate the resulting policies/frameworks.
Prioritize planning and investment in infrastructure and public service facilities that will support intensification (2.2.2.4.e))	NA	Provide specific policy language that prioritizes planning and investment that supports intensification.
Applying the policies of this Plan will support the achievement of complete communities (...) (2.2.1.4.)	Intent included throughout	Review to ensure that the language and strength of wording is in keeping with intent of 2017 GP.
<p>Economic development and competitiveness in the GGH will be promoted by:</p> <ul style="list-style-type: none"> <li>• Making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;</li> <li>• Planning to better connect areas with high employment densities to transit; and</li> <li>• Integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment (2.2.5.1.a)c)d))</li> </ul>	<p>The objectives of this Plan with respect to the Employment Districts are to:</p> <ol style="list-style-type: none"> <li>i. Provide opportunities for a diversified economic base which supports a healthy, stable economy and enhances employment opportunities;</li> <li>ii. Provide for and maintain an adequate supply of developable land;</li> <li>iii. Reduce and respect the natural conflicts between business uses and residential and public uses;</li> <li>iv. Encourage intensified development, either in terms</li> </ol>	Add in stronger emphasis on intensification, connections to transit and integration with land use planning goals.

	of added new jobs, or in assessment potential, and preferably both; and, v. Ensure that the necessary infrastructure is available to support current and projected needs. (4.2.1.d))	
Retail and office uses will be directed to locations that support active transportation and have existing or planned transit (2.2.5.3). In planning for employment, surface parking will be minimized and the development of active transportation networks and transit-supportive built form will be facilitated (2.2.5.4.).	NA	Add in policies as required.
Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will each develop an employment strategy (...) (2.2.5.5.).		Indicate that the OP will need to be updated to reflect the County Employment Strategy
Municipalities will plan for all employment areas within settlement areas, with the exception of any prime employment areas, by: <ul style="list-style-type: none"> <li>• Prohibiting residential uses and limiting other sensitive land uses that are not ancillary to the primary employment use;</li> <li>• Prohibiting major retail uses or establishing a size or scale threshold for any major retail uses that are permitted and prohibit any major retail uses that would exceed that threshold; and</li> <li>• Integrating employment areas with adjacent non-employment areas and developing vibrant, mixed-use areas and innovation hubs, where appropriate (2.2.5.7.).</li> </ul>	Business operations within the Employment Land designation are to be protected from intrusions of sensitive land uses that may restrict the operations of existing or planned industrial land users. (4.2.2.d) & (4.2.2.3.d) Building design, location and treatment should be compatible with surrounding uses. Buildings located adjacent to Provincial Highways, County Roads and Arterial Roads are expected to present a best face forward design approach, including landscaping, to heighten the aesthetic appeal of the location and the surrounding area. (4.2.2.f) & (4.2.3.f) Adequate visual screening between the uses permitted in the <b>Employment Area</b> designation and adjacent residential and open space uses shall be provided. (4.2.2.h) & (4.2.3.h)	Explicitly prohibit sensitive uses and/or establish specific threshold for retail uses.  Revise approach to permit integration of employment areas with surroundings where appropriate – likely more applicable for Employment Land designation.
The retail sector will be supported by promoting compact built form and intensification of retail and service uses	Implicitly included as encouraging intensification in mixed use areas (including retail).	Revise language to emphasize the role of intensification in supporting

and areas and encouraging the integration of those uses with other land uses to support the achievement of complete communities (2.2.5.12.).		the retail sector. This could be included in Section 3.3 Economic Development.
To support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes (2.2.6.3.).	NA (references limited to range of housing types/options)	Add in policy as required (Section 3.2 Housing).
Municipalities will maintain at all times where development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units. This supply will include, and may exclusively consist of, lands suitably zoned for intensification and redevelopment (2.2.6.4.).	The Town shall maintain servicing capacity within the municipal sewer and water systems to provide a minimum three-year supply of residential units in draft approved and registered plans, or in cases of residential intensification, land appropriately zoned and available for development. (3.2.3.b)	Acknowledge inclusion of lands zoned for intensification and redevelopment.

### 3.0 Infrastructure to Support Growth

New/Changed 2017 GP Policy	Existing Draft OP Policy	Required Changes
The 2017 Growth Plan reflects a shift in the responsibilities of Simcoe County through the requirement for comprehensive studies and linking growth management and infrastructure planning.		A general review of Section 6.0 will be required to reflect the new approach reflected in the 2017 Growth Plan and the increased role of Simcoe County.
Planning for new or expanded infrastructure will occur in an integrated manner, including evaluations of long-range scenario-based land use planning and financial planning, and will be supported by infrastructure master plans, asset management plans, community energy plans, watershed planning, environmental assessments, and other relevant studies where appropriate, and should involve:	Development of municipal infrastructure projects will be: i. Coordinated and phased in a manner which is efficient, cost effective, and minimizes disruption; and, ii. Undertaken in accordance with the Town's Master Plans, <i>Environmental Assessment Act</i> , and the appropriate Class EA requirements. (6.1.2.c)	Substantial policy change required to reference list of studies/planning to be integrated with infrastructure planning, strengthen link between infrastructure provision and achieving intensification and density targets, and considering life cycle costs.

<p>a) Leveraging infrastructure investment to direct growth and development in accordance with the policies and schedules of this Plan, including the achievement of the minimum intensification and density targets in this Plan;</p> <p>b) Providing sufficient infrastructure capacity in strategic growth areas;</p> <p>c) Identifying the full life cycle costs of infrastructure and developing options to pay for these costs over the long-term; and</p> <p>d) Considering the impacts of a changing climate (3.2.1.2.).</p>	<p>New planning and engineering concepts need to be considered and incorporated, particularly related to climate change, energy conservation and green infrastructure. The Town shall provide policy direction on the following:</p> <ul style="list-style-type: none"> <li>i. The implementation of objectives related to water conservation, energy conservation, air quality protection and integrated waste management opportunities;</li> <li>ii. The promotion of innovative residential and public building designs that contribute to energy reduction and natural resource conservation, as well as synergies between buildings and site management practices; and,</li> <li>iii. Green infrastructure to complement existing infrastructure, including the promotion of innovative low impact development (LID) opportunities and best practices that minimize the risks associated with natural hazards. (6.1.1.b)</li> </ul> <p>Expansion of the system will be coordinated with planning for new areas as well as street reconstruction. (6.2.1.c)</p> <p>Most of the developed portion of the Town is adequately served by a trunk sewer system. In anticipation of future growth the Town may initiate engineering studies for the purposes of expanding the capacity of the Waste Water Treatment Plant. The Plant will be expanded as necessary to a size sufficient to service population forecasts beyond the planning horizon of this Plan, provided that they conform to</p>	<p>It will be important that the Urban Service Area is well defined, and that the comprehensive studies identified in the 2017 Growth as required for expanded infrastructure are clearly outlined.</p>
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	Provincial growth forecasts. (6.3.1.b)	
Municipalities will assess infrastructure risks and vulnerabilities, including those caused by the impacts of a changing climate, and identify actions and investments to address these challenges, which could be identified as part of municipal asset management planning (3.2.1.4.).	NA	Add in policy as required.  Provide stronger language with respect to considering the impacts of climate change.
In the design, refurbishment, or reconstruction of the existing and planned street network, a complete streets approach will be adopted that ensures the needs and safety of all road users are considered and appropriately accommodated (3.2.2.3.).	It is the intent of the Town to establish a complete streets approach for the design of new public roads, as well as the reconstruction, repair, and maintenance of all existing Arterial, Collector and Local Roads. (...) (5.5.2.d)	This policy only needs some minor strengthening of language.
Municipalities will work with transit operators, the Province, Metrolinx where applicable, and each other to support transit service integration within and across municipal boundaries (3.2.3.3.).	NA	Add in policy as required.
Municipal water and wastewater systems and private communal water and wastewater systems will be planned, designed, constructed or expanded in accordance with the following: <ul style="list-style-type: none"> <li>• A comprehensive water or wastewater master plan or equivalent, informed by watershed planning (...) (3.2.6.2.c))</li> </ul>	NA	Add in policy as required. Water and wastewater master plans should include recommendations for a servicing strategy for the remaining lands which are designated for development but which are outside of the Urban Service Area.
Proposals for large-scale development proceeding by way of a secondary plan, plan of subdivision and vacant land plan of condominium or site plan will be supported by a stormwater management plan or equivalent, that: <ul style="list-style-type: none"> <li>• Is informed by a subwatershed plan or equivalent; <ul style="list-style-type: none"> <li>• Incorporates an integrated treatment approach to minimize stormwater flows and reliance on stormwater ponds, which includes appropriate low impact development and green infrastructure;</li> </ul> </li> <li>• Establishes planning, design, and construction practices</li> </ul>	Storm Water Management Plans are required for all new Plans of Subdivision, a one lot severance, Official Plan Amendments, Zoning By-law Amendments, developments under Site Plan Control, and may be required for developments, which by their nature, magnitude or location have a potential for negative impact on the drainage area. The proposed Storm Water Management Plan shall be acceptable to the relevant agencies and bodies having jurisdiction and shall be designed in accordance with any Town design	The policy needs to be updated to better reflect the consideration of large-scale subwatershed and settlement area stormwater management plans which will be undertaken in cooperation with the County, and the County's increased role in integrating infrastructure and growth management planning.

<p>to minimize vegetation removal, grading and soil compaction, sediment erosion, and impervious surfaces; and</p> <ul style="list-style-type: none"> <li>Aligns with the stormwater master plan for the settlement area, where applicable (3.2.7.2.).</li> </ul>	<p>standards, and if applicable, the Master Drainage Plan for the sub-watershed area. (...) (6.4.3.b)</p>	
<p>Planning for public service facilities, land use planning and investment in public service facilities will be co-ordinated to implement this Plan.</p> <p>Public service facilities and public services should be co-located in community hubs and integrated to promote cost-effectiveness.</p> <p>Priority should be given to maintaining and adapting existing public service facilities and spaces as community hubs to meet the needs of the community and optimize the long-term viability of public investments.</p> <p>Existing public service facilities that are located in or near strategic growth areas and are easily accessible by active transportation and transit, where that service is available, should be the preferred location for community hubs.</p> <p>Municipalities will collaborate and consult with service planning, funding, and delivery sectors to facilitate the co-ordination and planning of community hubs and other public service facilities.</p> <p>New public service facilities, including hospitals and schools, should be located in settlement areas and preference should be given to sites that are easily accessible by active transportation and transit, where</p>	<p>The Town may consider:</p> <ol style="list-style-type: none"> <li>i. Creative approaches to the development of facilities and delivery of services, with the Town participating in the co-design and co-delivery of services with other government agencies, the private sector and/or non-profit organizations;</li> <li>ii. The coordination of community infrastructure and public service facility planning, land-use planning, and community infrastructure investment;</li> <li>iii. The development of an appropriate range of community infrastructure and public service facilities to meet the needs of the Town resulting from population changes and to foster complete communities;</li> <li>iv. The development of community infrastructure and public service facilities in community hubs that support transit use and active transportation initiatives; and,</li> <li>v. The co-location of community infrastructure and public service facilities to promote cost-effectiveness and facilitate service integration. (3.1.14.a)</li> </ol>	<p>Need to add additional detail, including giving priority to maintaining existing public service facilities and locating new facilities in or near strategic growth areas, the terminology must be updated and the language must be significantly strengthened.</p>

that service is available (3.2.8).		
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#### 4.0 Protecting What is Valuable

New/Changed 2017 GP Policy	Existing Draft OP Policy	Required Changes
<p>Beyond the Natural Heritage System, including within settlement areas, the municipality:</p> <ul style="list-style-type: none"> <li>• will continue to protect any other natural heritage features in a manner that is consistent with the PPS; and</li> <li>• may continue to protect any other natural heritage system or identify new systems in a manner that is consistent with the PPS (4.2.2.6.).</li> </ul> <p>Development or site alteration is not permitted in the vegetation protection zone (...) (4.2.4.3.)</p>	<p>Section 4.5.3</p>	<p>Need to insert new Section 4.5.3 as revised during Phase 1 of the “Expanded OPR Scope” workplan, as well as implement required schedule updates.</p>
<p>Cultural heritage resources will be conserved to foster a sense of place and benefit communities, particularly in strategic growth areas.</p> <p>Municipalities will work with stakeholders as well as the First nations and Metis communities, in developing and implementing Official Plan policies and strategies for the identification, wise use and management of cultural heritage resources.</p> <p>Municipalities are encouraged to prepare archaeological management plans and municipal cultural plans and consider them in their decision-making (4.2.7.).</p>	<p>The maintenance of Midland’s cultural heritage resources will contribute to the Town’s character by balancing the impact of new development and redevelopment with protecting the integrity of existing heritage. (...) (3.4.1.a)</p> <p>The Town recognizes that the geographic area of the Town is of interest to a number of First Nations and the Métis Nation, built over time. As such, the Town will make every effort to ensure the notification and involvement of all First Nations and Métis Nation having interest in cultural heritage matters, as appropriate. (3.4.1.e)</p> <p>Consulting with First Nations and the Métis Nation is also mentioned in context of Archaeological</p>	<p>The policies must be revised to state the link between cultural heritage resources and fostering a sense of place in strategic growth areas.</p> <p>Further, the names of the proposed plans should be updated to match the 2017GP terminology and consideration should be given to the Town preparing the archaeological management plan.</p>

	<p>Assessments throughout.</p> <p><b>3.4.8 Heritage Master Plan</b></p> <p>a) The Town should consider the preparation of a Heritage Master Plan, which is undertaken by qualified heritage consultants including individuals licensed under the <i>Ontario Heritage Act</i>. The Heritage Master Plan will identify and map cultural heritage resources including known provincially registered archaeological sites, features, landscapes or districts. A Heritage Master Plan would also outline policies, programs and strategies to conserve significant cultural heritage resources.</p> <p>b) The preparation of a Heritage Master Plan should be guided by the Midland Heritage Committee with direct representation of all First Nations and the Métis Nation having interest as identified by the Town.</p> <p>c) The Town shall support the preparation of an Archaeological Master Plan by the County of Simcoe and cooperate with the County with its implementation in the Town.</p>	
<p>Establishes requirements for the rehabilitation of new mineral aggregate operation sites, including with respect to ecological value, health or key natural heritage or hydrologic features, aquatic enhancement, and reflecting the long-term land use of the general area and applicable policies. (summary of 4.2.8)</p>	<p>A plan for the ultimate rehabilitation of the site and planning or other studies to support its viability or appropriateness; (4.6.3.c)iii)</p>	<p>Provide more detail with respect to what needs to be addressed in a rehabilitation plan.</p>
<p>Municipalities will develop and implement Official Plan policies and other strategies in support of the following conservation objectives:</p> <ul style="list-style-type: none"> <li>• energy conservation for existing buildings and planned developments, including municipally owned facilities,</li> </ul>	<p>New planning and engineering concepts need to be considered and incorporated, particularly related to climate change, energy conservation and green infrastructure. The Town shall provide policy direction on the following:</p>	<p>More emphasis needs to be placed on district energy and other alternative energy systems and distribution processes.</p>

<p>including through:</p> <p>1. identification of opportunities for conservation, energy efficiency and demand management, as well as district energy generation, renewable energy systems and alternative energy systems and distribution through community, municipal and regional energy planning processes, and in the development of conservation and demand management plans (4.2.9.1.b)i.);</p>	<p>i. The implementation of objectives related to water conservation, energy conservation, air quality protection and integrated waste management opportunities;</p> <p>ii. The promotion of innovative residential and public building designs that contribute to energy reduction and natural resource conservation, as well as synergies between buildings and site management practices; and, (...) (6.1.1.b)</p> <p>3.1.5 Green Buildings</p>	
<p>Municipalities should develop excess soil reuse strategies as part of planning for growth and development (4.2.9.2).</p> <p>Municipal planning policies and relevant development proposals will incorporate best practices for the management of excess soil generated and fill received during development or site alteration, including infrastructure development (...) (4.2.9.3).</p>	<p>NA</p>	<p>Add in policy as required.</p>
<p>Municipalities are encouraged to reduce greenhouse gas emissions and address the impacts of climate change through developing greenhouse gas inventories and establishing municipal interim and long-term greenhouse gas emission reduction targets. (summary of 4.2.10.2)</p>	<p>NA</p>	<p>While not a prescribed policy, Midland’s Official Plan policies should be strengthened and additional specificity regarding quantitative approaches to tracking and reducing greenhouse gas emissions considered, in addition to additional policies which are consistent with the requirements for the County outlined in 4.2.10.1. A future County climate change mitigation framework should be identified and incorporated as appropriate when available.</p>

**6.0 Simcoe Sub-area**

New/Changed 2017 GP Policy	Existing Draft OP Policy	Required Changes
<p>Any lands that are designated for agricultural uses or rural uses in a lower-tier Official Plan as of January 20, 2017 can only be designated for development through a municipal comprehensive review and subject to the policies in subsection 2.2.8 (6.3.5).</p>	<p>Section 4.6</p>	<p>Consider providing further clarification with respect to the implications of these lands not being identified as ‘urban’, such as that while a County municipal comprehensive review would be required for redesignation, no County Official Plan Amendment and Provincial Approval would be required.</p>