



Town of Milton
Memo

To: Jill Hogan, Director of Planning Policy and Urban Design
From: David Twigg, Senior Planner, Planning Policy and Urban Design
Date: Thursday, September 30, 2021
Subject: Key Supplemental Information Required for the ROPA

The purpose of this memo is to address item 2 of the Key Supplemental Information Required for the ROPA as follows:

“The PJR report for the ROPA would need further analysis on how the policies of the Greenbelt are being met:

- *4.2.1.1 b) specifically as it relates to infrastructure connections among urban centers and between these centers.*
- *4.2.1.2 related to the location and construction of infrastructure in the Protected Countryside*
- *4.2.3 related to stormwater management and resilient infrastructure policies*
- *Other Greenbelt Plan tests that are generally required by 3.2 Natural System”*

The proposed ROPA conforms, or does not conflict, with the Policies in Section 4.2 of the Greenbelt Plan.

Conformity with 4.2.1.1 b) is addressed on page 30 of the PJR as follows:

“Infrastructure, which includes stormwater management systems, is permitted in the Greenbelt Plan if it meets one of two general objectives. These objectives must be considered in the overall context of the Greenbelt Plan. Objective (b), which is the objective applicable to the proposal, refers to infrastructure that “serves the significant growth and economic development expected in southern Ontario beyond the Greenbelt”.

[...] The proposed ROPA will facilitate infrastructure, including green infrastructure, necessary to support the MEV. Flexibility to consider innovative and creative stormwater management systems in the Protected Countryside will serve provincial, regional and local interests for optimal

development of the MEV lands, including the efficient delivery of the post-secondary education campus. As such, the proposal for stormwater management and resilient infrastructure, including green infrastructure, related to the MEV would clearly serve significant growth and economic development in southern Ontario beyond the Greenbelt.”

Supplementary information was provided to Regional Staff by e-mail dated May 26, 2020 attaching a memo by Elizabeth Howson, MSH. The memo provides expert planning opinion on the interpretation of Section 4.2.1.1 b) as follows:

“in reviewing objective b) which is the objective applicable to the proposal, stormwater management and resilient infrastructure, including green infrastructure, related to the MEV would clearly serve the significant growth and economic development in southern Ontario beyond the Greenbelt. This is the key direction of objective b) and the only portion applicable to any stormwater management or resilient infrastructure project. Projects which are clearly necessary to serve such growth and anticipated by the Greenbelt Plan, but projects which do not, unlike major sewer and water or transportation projects, generally provide connections among urban centres. They are however important to the economic well-being, human health and quality of life, they accommodate projected growth, and most significantly they mitigate the impacts of climate change. As such, these projects will assist in the achievement of the objectives for infrastructure permitted in the Greenbelt, provided that they also meet the other criteria established in Section 4.2.”

Conformity with 4.2.1.2 and 4.2.3 of the Greenbelt Plan is addressed on page 31 of the PJR. In particular, the PJR notes that:

“The Greenbelt Plan establishes a number of criteria for evaluating proposals for infrastructure, including stormwater and resilient infrastructure, in the Greenbelt. The majority of these criteria are criteria which must be examined with respect to specific infrastructure projects or which require additional studies.”

In this respect, the ROPA will conform with the Halton Region and Town of Milton Official Plan, and any applicable legislation, policies, regulations and guidelines.

Specifically, but without limiting the generality of the foregoing:

- Planning, design and construction practices shall minimize, wherever possible, the amount of the Greenbelt, and particularly the Natural Heritage System and Water Resource System, traversed and/or occupied by such infrastructure;
- Planning, design and construction practices shall minimize, wherever possible, the *negative impacts* on and disturbance of the existing landscape, including, but not limited to, impacts caused by light intrusion, noise and road salt;
- New or expanding infrastructure shall avoid key natural heritage features, key hydrologic features or key hydrologic areas unless need has been demonstrated and it has been established that there is no reasonable alternative;

- Infrastructure development and activities related to the use of renewable resources will only be permitted in prime agricultural areas after completion of an agricultural impact assessment. Where adverse impacts on the agricultural system are unavoidable, measures will be required to minimize or mitigate the impacts as far as possible.
- Planning, design and construction of stormwater management infrastructure shall be carried out in accordance with the policies in subsection 3.2.7 of the Growth Plan.
- Stormwater management systems are prohibited in key natural heritage features, key hydrologic features and their associated vegetation protection zones. The determination of appropriate vegetation protection zones shall be defined in accordance relevant policies of the Greenbelt Plan.
- Applications for *development* and *site alteration* in the Protected Countryside shall be accompanied by a stormwater management plan which demonstrates that:
 - a) Planning, design and construction practices will minimize vegetation removal, grading and soil compaction, sediment erosion and impervious surfaces;
 - b) An integrated treatment approach will be used to minimize stormwater flows and mimic natural hydrology through lot level controls, *low impact development* and other conveyance techniques;
 - c) Applicable recommendations, standards or targets within a *subwatershed plan* or equivalent and water budgets will be complied with; and
 - d) Applicable objectives, targets, and any other requirements within a stormwater master plan will be met in accordance with the policies in subsection 3.2.7 of the Growth Plan.
- The objectives of a stormwater management plan are to avoid, or if avoidance is not possible, minimize and mitigate stormwater volume, contaminant loads and impacts to receiving water courses in order to:
 - a) Maintain groundwater quality and flow and stream baseflow;
 - b) Protect water quality;
 - c) Minimize the disruption of pre-existing (natural) drainage patterns wherever possible;
 - d) Prevent increases in stream channel erosion;
 - e) Prevent any increase in flood risk; and
 - f) Protect aquatic species and their habitat.

The proposed ROPA conforms, or does not conflict, with the Policies in Section 3.2 of the Greenbelt Plan.

Conformity with Section 3.2 of the Greenbelt Plan, especially 3.2.2 to 3.2.5 of the Plan, is addressed on page 31 of the PJR as follows:

“For lands within the Greenbelt Natural Heritage System, the infrastructure projects and activities related to the use of renewable resource proposed by the ROPA will be required to demonstrate the following:

- i. No negative impacts on key features or their ecological functions;*
- ii. Maintenance or enhancement of connectivity along the system and between key feature and areas;*
- iii. Incorporation of other natural features into the design of infrastructure and activities related to the use of renewable resource use;*
- iv. Restriction of the disturbed area to less than 25% of the total developable area of the property;*
- v. No impervious areas;*
- vi. Maintenance or restoration of a least 30% of the total developable area of the property to natural self-sustaining vegetation.*

Within key features of the natural heritage system, including any vegetation protection zones, development and site alteration will be limited to environmental management and essential conservation and erosion or control projects. Activities related to the use of renewable resources will be required to maintain or, where possible, improve key features and their functions.

Within 120 metres of a key feature, proposals for development and site alteration will be supported by a study that establishes a vegetation protection zone of at least 30m (measured from the outside boundary of the feature) and is of sufficient width to protect, and where possible restore or enhance, the feature and its ecological functions.

The ROPA prohibits stormwater management systems in key features of the natural heritage system and their associated vegetation protection zones. Planning, design and construction of stormwater management infrastructure shall be carried out in accordance with the Functional Stormwater and Environmental Management Strategy (FSEMS) for the MEV lands.

The proposed ROPA will permit lot creation or minor lot adjustments to facilitate infrastructure and for conveyance to a public body or not for profit entity for environmental stewardship and conservation land management purposes. The proposed ROPA encourages good stewardship practices and the development of a connected system of publicly accessible open space and trails to support recreational enjoyment and study of the natural heritage system. Activity will be directed away from sensitive landscapes through clear demarcation of where public access will be permitted.”