Town of Oakville – Response to Proposed Growth Plan for the Greater Golden Horseshoe, 2016.

Numeric Reference	Policy Text	Comments
2.2.1.3.f)	Managing Growth 3. Applying the policies of this Plan will support the achievement of complete communities that: f) integrate green infrastructure and low impact development;	Additional guidance on LID is required. Province will need to ensure LID is appropriately supported and requirements and/or guiding documents updated as needed, for example Ministry of the Environment Stormwater Management Planning and Design Manual (2003).
2.2.5.3	Prime Employment Areas 3. Suitable lands within settlement areas that are adjacent to, or in the vicinity of, major goods movement facilities and corridors, including major highway interchanges, should be identified as prime employment areas.	The Town of Oakville maintains that the identification and designation of <i>prime employment areas</i> are also the domain of lower-tier municipalities. It is through local knowledge, planning and decision-making that appropriate locations to meet local conditions may be identified and incorporated into local municipal official plans.
	Upper- and single-tier municipalities may also identify other existing <i>employment areas</i> within settlement areas as prime employment areas, where appropriate.	Proposed Growth Plan (2016) policy 2.2.5.3 should be re-worded to replace "Upper- and single-tier municipalities" with "Municipalities".

2.2.5.9	9. Major office and appropriate major institutional development will be directed to urban growth centres, major transit station areas or other strategic growth areas with existing or planned frequent transit service.	The term "directed" in Section 9 (and other areas) should be clarified. Does it mean "required" or "encouraged"? This policy would have major implications for office development in strong geographic markets on employment lands that are not in urban growth or strategic growth areas with frequent transit. Major office as defined (which could be fairly small under the definition) should be permitted on a broad range of employment lands. The proposed policy direction would preclude development of major office along key corridors such at the QEW in Oakville. These employment lands exhibit strong market for major office development and due to land prices will not see land intensive warehouse and logistics type development.
3.2.7.1.c)	Stormwater Management 1. Municipalities will develop stormwater master plans or equivalent for serviced settlement areas that: c) incorporate appropriate low impact development and green infrastructure;	The province needs to provide stormwater standards LID/Green infrastructure. As technology is moving quickly, suggest outcome based policies rather than prescriptive.

3.2.7.2.c)	Stormwater Management	Thus policy should have added the underlined section:
	2. Proposals for large-scale <i>development</i> proceeding by way of secondary plans, plans of subdivision and vacant land plans of condominium, and proposals for resort <i>development</i> , will be supported by a <i>stormwater management plan</i> or equivalent, that:	" establishes planning, design and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion and impervious surfaces and considers the impacts of climate change and incorporates appropriate mitigation and adaptation strategies"
	c) establishes planning, design and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion and impervious surfaces; and	
4.2.5	Public Open Space	General Comment: the province needs to ensure clear distinction between and protection for natural heritage and public open space. As pressure increases to provide additional recreational facilities/uses there will also be increased pressure to move these into "free" natural areas that are currently providing carbon sinks and ecological services.
4.2.10.1	Climate Change 1. Upper- and single-tier municipalities will develop policies in their official plans to identify actions that will reduce greenhouse gas emissions and address climate change adaptation goals, aligned with the Ontario Climate Change Strategy, 2015 and Action Plan.	When referencing climate change actions, it is limiting to only consider mitigation when it will be necessary to adapt so include adaptation along with mitigation. Although it may be challenging to implement adaptation and mitigation policies "in tandem", there could be opportunities for synergistic action between adaptation and mitigation.

5.2.6	Performance Indicators and Monitoring	The town supports high-level indicators that are consistent across the province with flexibility for municipalities to develop additional ones as they see fit. Recommend that if the province develops indicators that they ensure methodology is provided to ensure consistency.
Definition	Major Office Freestanding office buildings of approximately 4,000 square meters of floor space or greater, or with approximately 200 jobs or more.	This definition provides for a relatively small development in the context of a strong and evolved urban office market. As proposed, major office is to be directed to urban growth centres, major transit areas or strategic growth areas with transit. The may adversely affect the ability to develop other employment lands. Many recent office developments in Oakville, including national corporate head offices, would not have been permitted in their present locations, yet these locations were identified by the respective companies as the best of all available sites.