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September 29, 2008

(Delivered by email hard copy to follow)

Halton Region
Long Range Planning
Legislative and Planning Services Department
1151 Bronte Road
Oakville, ON L4M 3L1

Attention: **Perry Vagnini, Acting Senior Policy Analyst**

RE: Response Brief to Sustainable Halton: Working Paper #1: Locating New Urban Land

Dear Mr. Vagnini:

May I take this opportunity to introduce the "East Milton Land Owners Group".

We are a group of land owners on the east side of Milton who have a genuine interest in this planning program and as a consequence we have thoroughly reviewed the planning documents and have attended the public meetings. We have been active in the community for over 15 years and our business interests span some 800 acres of land. Owing to our strong belief in Milton's future, we have made significant investments in the Milton area.

On behalf of our group, we are most grateful for the opportunity to participate in the process and for the opportunity to share with the project planning team our perspective on the working paper, as well as, our business assessment of the emerging strategic planning constraints and opportunities.

Thank you and please find attached our response to the above noted working paper.

Yours truly,

YORK TRAFALGAR CORP.

York Gruehl

Attachment: A Response Brief to: the "Sustainable Halton Working Paper #1 Locating New Urban Land" September 22, 2008

cc.

Anita Fabac, Acting Manager, Long Range Planning
Alana Fulford, Intermediate Planner

A Response Brief to:

“Sustainable Halton Working Paper #1 Locating New Urban Land”

Prepared by Procepts Ltd.

For

the East Milton Landowner's Group

Sept 26, 2008

Introduction

The following brief has been prepared by Procepts Ltd. for the "East Milton Landowners Group" who represent a sizeable portion of the lands in the area which is bounded to the north by the C.P.R., west by Trafalgar Road, to the east by 8th Line, and south to Highway 407. This area will be referred to as "East Milton".

The purpose of this "Brief" is to formally respond to "*Sustainable Halton: Working Paper #1: Location Urban Land*", that was released by the Regional Municipality of Halton in the summer of 2008.

The contents of this "Brief" include:

1. A list of "*Key Observations and Concerns*" identified by the "East Milton Landowners Group" and a reasoning of the importance of these concerns as they affect both economic growth strategies and development decisions for this area;
2. An identification of "*Key Issues*" that have arisen as a result of a research, study and consultation on the suggested "Refined Concepts" outlined and put forth in the "Working Paper";
3. "*Reasons*" for support of a *New Refined Plan* as discussed during the public consultation process which addresses the significant planning differences between Milton and Georgetown, more specifically, a plan which would exploit the available high order infrastructure south of the 401; and
4. A "*Summary of Recommendations*" resulting from the work and consultation process undertaken by Procepts Ltd. with members of the "East Milton Landowners Group", and from the participation of Procepts Ltd. principals in the public consultation process.

Summary of Recommendations

As a result of our review of the “Working Paper”, more specifically, the Five “Refined Concepts”, and in addition to participation in the working sessions during the public consultation, we would respectfully recommend:

1. That new development to 2031 should be allocated to the 401 south Milton Study Area, in particular, the East Community as the optimum development area. The Town of Milton and its environs must be understood as a distinct planning area that is defined by the GTA’s infrastructure pattern - an area significantly different than the lands north of the 401. Further, we support the Town Of Milton Report PD-076-08;
2. That the configuration of the *Natural Heritage System* be reviewed and reflect current approvals. In addition, that all lands that are currently used for urban related purposes should be recognized, including golf courses, and that the land parcels in the proposed and future potential sub-community expansion areas, not be unduly fragmented. It is our view that *natural heritage systems* should delineate systems of a natural character and not those which are man-made;
3. As an adjunct to this work, the Regional Municipality of Halton should establish a mature state “vision” for the Region by preparing a comprehensive urban development plan to efficiently manage and accommodate urban expansion beyond the “Places to Grow” (2031) targets. It is our experience that a twenty year timeframe to complete development and the ultimate occupancy of such proposed master planned communities is a relatively short period;
4. That the Refined Plan should incorporate an additional 1,800 hectares of retail and employment land;
5. Further detailed studies concerning the financial impacts of phased growth should be initiated. These studies should include and clarify where economies of scale could be achieved for the longer term development of identified sub-communities; and
6. That the Region should make every effort to secure and take full advantage of the post secondary educational opportunity now emerging to strengthen Milton’s distinctive identity while fostering job growth in the knowledge based sectors of the Ontario economy.

1. Key Observations and Concerns

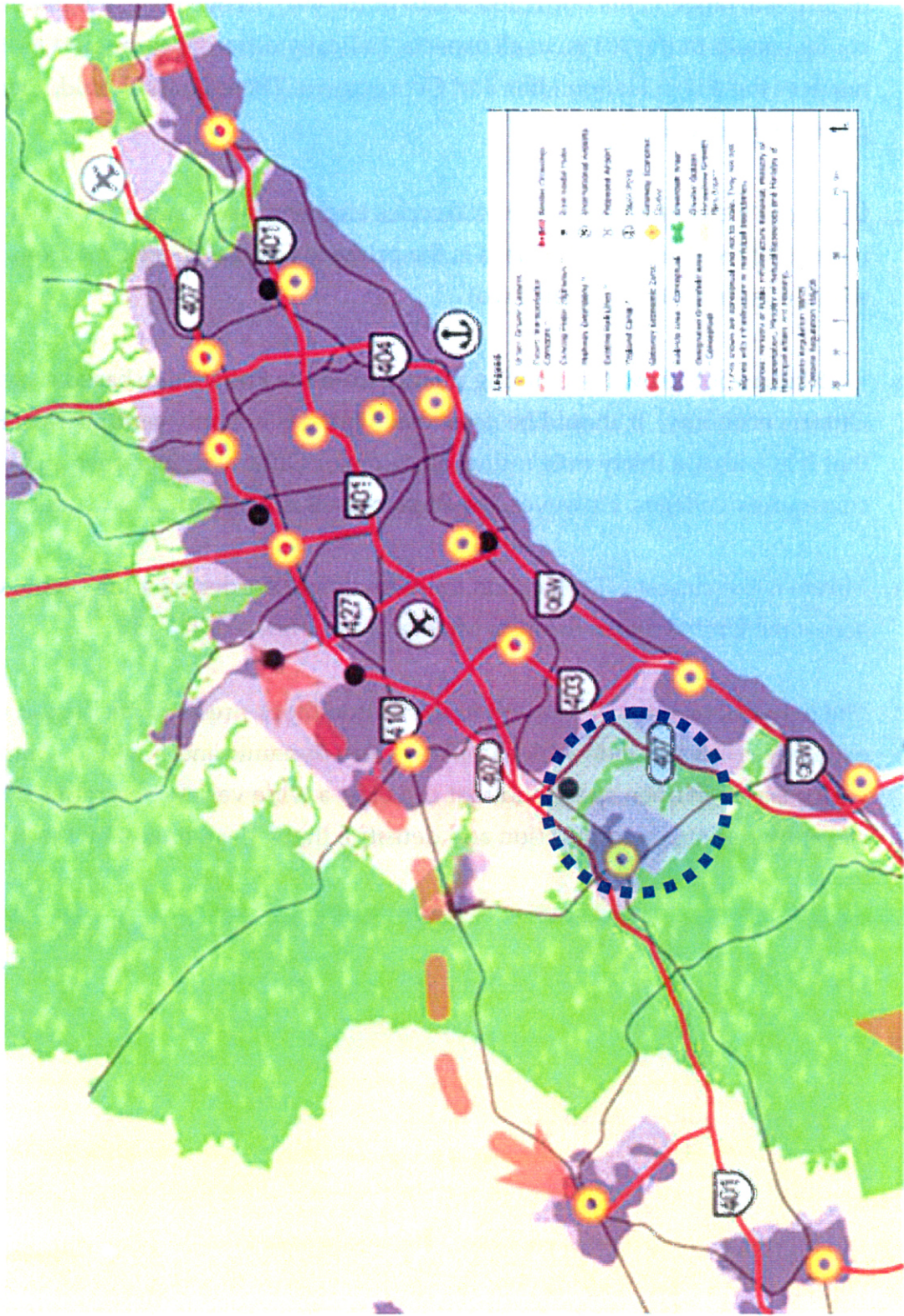
In initiating the process of responding to, and working towards a reply to the "Working Paper", a number of "Key Observations" were made and "Key Concerns" identified that governed the Groups' discussions and which ultimately effected the recommendations made in this brief.

The Group is appreciative for the opportunity to review all the background studies and to participate in the working sessions over the past two weeks. Arising from this work, we have come to recognize the very special place Milton occupies in the fabric of the GTA and the exceptional opportunity unfolding within our Region. It is from this vantage point that we offer the following:

1. The Refined Concept must recognize and emphasize its geographic inter-relationships and the effects of regional market forces:

- a. Halton Region is part of a larger geographic and economic growth area that includes other successful abutting urban settlement regions within Ontario and the U.S.;
- b. Milton's urban areas are located adjacent to the strongest and most rapidly growing economic areas in Ontario. While Milton's prosperity has been historically tied to the high quality of adjoining agricultural land, it must recognize that in the future, its prosperity will flow from its adaptation of knowledge based industries and from its proximity to Toronto, the eighth largest world financial centre;
- c. Proximity to Pearson Airport and the related job development around the country's major transportation facility, are major reasons to commence economic development and stimulate job creation along the 401/407/403 corridors that extend through Halton Region;
- d. Development within the GTA is located within a matrix of "super blocks", structurally framed by the region's #400 series expressways. The Milton "block", south of the 401, is the last remaining significant and greatly undeveloped area within the entire GTA; (Map One)

MAP ONE



- e. In all three concepts (five plans), growth is located either south of the 401, or in two different arrangements north and south of the 401. In our view, the planning context south of the 401 is, in all aspects, radically different compared to the lands north of the 401 in Halton Hills and Georgetown. These lands should, therefore, be planned independently;
- f. Owing to the confluence of the #400 series Highways and major rail links at Milton, it must be recognized that Milton is the primary *Gateway to the GTA* from southwestern Ontario; (Map Two)
- g. With future job growth stemming mainly from the knowledge based sector of the Ontario economy, it should be *noted* that Milton is not only centrally located, but that it is within a thirty mile radius of six major Ontario universities and numerous community colleges. However, the Region itself is home to no university;
- h. Milton is the closest GTA location to international border crossing points which access the United States through Michigan and New York; and
- i. The network of valley lands within the Milton Block presents the Region with an expansive canvass upon which to plan a very dynamic and pleasing community which is rich in open space and that can offer a wide variety and range of housing accommodation, (configuration and density), that are all linked by the NHS.

Regional Map Two



2. *The East Milton Lands are partially mischaracterized. The lands are used for existing urban fringe uses rather than farmland, and the NHS mapping south from Britannia East of Trafalgar is inaccurate. This causes unnecessary fragmentation and incorrectly assumes unproductive and inefficient servicing costs while weakening linkages:*
- a. Much of the land South of Britannia and East of Trafalgar depicted as NHS is the subject of a development agreement which has delineated the NHS in a pattern significantly different than that depicted in the *Working Paper*;
 - b. The *Working Paper* overstates the actual NHS impact on the Trafalgar and Britannia Corridors. Consequently , it unduly prejudices realization of infrastructure optimization, urban system nodes and corridors, agricultural preservation and employment goals;
 - c. Land uses within the East Milton area reflect urban fringe activities such as golf courses, market garden and green house operations, estate housing, equipment supply and contractor yards. These lands are already largely urbanized, but at a low intensity. Long term redevelopment of these lands within the 2031 timeline, is, therefore, consistent with the stated goals of the work program;
 - d. While development of the lands within the Milton Block and the East Milton Community make sense because of the quality of development in terms of NHS protection and distinct community goals, the focus should be on urban design considerations which should be addressed in subsequent phases of the project.
3. *The infrastructure development costs associated with expansion must become a major consideration. This cost analysis must be integrated into the process which is responsible for preparing the final refined concept;*
- a. It should be noted that the Milton East Community can be serviced from existing and planned infrastructure with comparatively minimal NHS impact. In addition, it

is the least cost infrastructure expansion option offering high efficiency in the use of existing hard and soft infrastructure and utilities;

- b. The savings in municipal related capital projects is a beneficial consequence not only to those who will work and live in the Milton East Sub-Community, but also to all taxpayers of Halton Region and their local municipalities;
- c. Water service has been proposed by the Region to proceed from North Oakville on an alignment along Trafalgar Road thus providing water to the Milton East sub-community. Various pressure zones will determine the extent of works;
- d. The sanitary sewer connections which would service the East Milton Sub-Community can be organized through the over-sizing of sewer lines and pumping stations that are envisioned for servicing the already designated employment lands of Business Park 2. The East Milton Sub-Community would connect to a planned pumping station half way between Derry and Britannia Roads along the St. Laurent Mid Block Collector as proposed in the 2008 MPCL;
- e. Halton Region is currently developing the road corridor system by providing a four lane network on Derry and Trafalgar Roads. This lends itself well to effective residential development to the south of the employment corridor with a focal point at Derry Road and the recently upgraded Trafalgar Road intersection and to the GO transit line; and
- f. The availability of utilities along the Trafalgar corridor should also be an infrastructure consideration.

4. The current planning program underestimates the positive employment and social impact of the planned post secondary project in strengthening Milton's identity

- a. Universities are "Knowledge Creators" and are the indispensable players in the advancement of scientific knowledge, which continually seed new generations of applied research, scientific breakthroughs and streams of new products. They play a

central and strategic role in educating and training the scientists, teachers, researchers, entrepreneurs and other skilled workers that fuel innovation in high technology and the knowledge industries that are the primary drivers of successful regional economies today. Universities create employment and fuel long term sustained economic regional growth; and

- b. Universities significantly contribute and impact a region's quality of life, providing access to diverse activities that have implications on ancillary economic and community life, while contributing to a community's already established identity; and
- c. Milton has been pursuing a University presence since 1994.

5. *We agree with the recommendation in the earlier Hemson studies of using the high range of the 4,200 hectare area to accommodate emerging market opportunities:*

- a). The Sustainable Halton Study determined that there was a proposed range of between 3,000 to 4,200 hectares that could be dedicated for expansion growth, with 600 hectares for employment uses in either case. The lower amount of new urban land at 3,000 gross hectares is based on achieving the provinces target of accommodating 40% of new housing development within existing areas by 2015. Therefore, the larger amount is required if the 40% target is not accomplished within the next 5-6 years;
- b). The "Working Paper" suggests only 3,000 hectares be dedicated for expansion growth on the assumption that "other Urban Uses" which typically and historically have assumed 30% of the urban area will, through intensification, be reduced to 20%. The major concern is that with no supporting documentation, utilizing the suggested minimum number of only 3,000 hectares would offer very little flexibility for future development and expansion and retard the ability of the Region to provide the vary range of private amenities, institutions, and retail which form the very basis of the "Vision" statement;

- c). By only utilizing the minimum amount of hectares, there is a possibility, and even a strong probability, that this would lead to an eventual lack of availability of employment lands, especially as present employment lands in Mississauga and Brampton are developing at a very rapid pace; and
- d). The Group strongly believes that in order to support a strong Ontario economy and to benefit locally from regional economic growth in this area, Halton Region must position itself more favourably to better allow it to compete for major investments by providing timely availability of land.

6. That starting from the already evident financial advantage of developing the Milton East Community, Halton Region should examine the financial aspects and concerns of phasing growth, where economies of scale are essential for infrastructure development for the longer term:

- a) The discussion of the original nine concepts and the present selection of the "Three Refined Concepts" must recognize and fully appreciate the importance of the economic implications that arise from the Region's geographic relationships with its neighbours;
- b) The "Refined Concepts" artificially and unnecessarily provide a mutually exclusive choice between development of the East Milton Sub-Community or the expansion of the Georgetown Sub-Community;
- c) The prioritizing of the south and southeast Milton area is inappropriate because this option only responds to the issue of immediate sewer servicing and not to water and transportation issues. Furthermore, it entirely ignores that the strongest growth pressure in Halton is nearer the Highway 401/407/403 corridors;
- d) Locating residential and mixed urban uses in south and southeast Milton, while seeming to be appropriate in some areas, should not be made a priority over the lands located in the East Milton Sub-Community.

7. Halton Region should move towards the development of a mature state vision that incorporates the current "Places to Grow" targets and timeline:

- a) If the Refined Concepts were to consider a **mid-range** of 3,600 hectares (3,000 hectares for residential and mixed-use urban) and an **upper-end** concept of 4,200 hectares as the Sustainable Halton Studies suggest, it would raise other, appropriate and less limiting options, like greater employment land areas etc.;
- b) At a minimum, this approach offers the opportunity to review and consider the most cost effective expansion, thus leading to better attainment of planning goals as set out in the "Halton Regional Plan" and as guided by the objectives of the Province's "Places to Grow" (2006) and the "Provincial Policy Statement" (2005); and
- c) The lower-end of the range with only 3,000 hectares assumes the greatest level of intensification, the greatest shift in housing type, and a reduction in the ancillary use factor from 30% to 20%. This has the effect of constraining not promoting a range of housing and community design options.

2. Key Issues

The results of study and discussion of the Group's "*Key Concerns*", led the Group to formulate a number of "*Key Issues*" that it feels it needs to both present, and await a response from both municipal and regional authorities. These issues are itemized as follows:

- 1) **The Primary Study Area is composed of two distinct sub areas.** Growth centred in the Milton Block and expansion of the Georgetown Community are two totally separate planning challenges which have coincidentally merged. These planning challenges need to be addressed separately;
- 2) **Focus development on existing infrastructure and utilities.** Given that the Refined Concepts will only add 3,000 hectares of urban land, to maximize the attainment of community goals, Halton Region should prefer to see the development of the "East Milton" lands over those of other subject land areas;
- 3) **Realisation of critical density assumptions in the short term by 2015.** The 3,000 hectare option is a *radical* option which requires the greatest change in intensification and greatest change in housing type requiring the least amount of land through a 40% intensification shift by the year 2015. Given that earlier studies, "*Sustainable Halton*" justified expanded urban growth areas in a range of 3,000 to 4,200 hectares, the final concept should offer choices regarding densities, location and timing, which utilize a *middle to high end* area amount versus the presently suggested 3,000 hectares. The key issue is to develop a plan that responds to immediate and long term market issues which in turn respond to, but are not led, by the Province's "Place's To Grow" document;
- 4) **Inability to evaluate options absent a Financial Plan.** A *capital cost analysis* of the refined development option(s) must be completed as part of the next step of the plan development process. This analysis should clearly identify what variations of infrastructure are required to satisfy the associated growth concept(s);
- 5) **Accurate Base Condition Characterisation.** The extent of the *Natural Heritage Systems* must be justified and further detailed. The "East Milton" existing urban

fringe land uses be reflected in the base condition mapping upon which concepts are prepared and evaluated;

- 6) **Take advantage of Milton's strategic location.** It must be recognised that the Milton Block (Milton, 401, 407/403) is strategically located, largely serviced and most importantly, poised to take advantage of emerging market opportunities, which, if harnessed properly, will underwrite the Region's environmental and quality of life goals for decades to come. In addition, the westward migration of the "Toronto" urban fringe over the past 100 years, to its current boundary adjacent to Milton repositions Milton's future market position as the western gateway to the GTA.

3. Reasons for the Support of Milton's Refined Concept

1. *The East Milton Sub-Community Infrastructure Corridor Best Meets "Halton Region" Employment Land Needs:*

Giving East Milton priority development most adequately responds to the demands of the Highway 401 employment lands, in addition to lands adjacent to Highways 403 and 407. This corridor of land, running adjacent to Highway 401, has a combination of attributes for employment expansion that is unique in north Halton Region. It:

- a) offers direct visual impact and exposure to potential employment uses,
- b) has nearly 20 miles of existing highway frontage,
- c) has high capacity electrical power available throughout its entire length, not to mention available uses of lands under the power lines,
- d) can be serviced by excellent direct rail service to industrial sites from the CP main line,
- e) abuts an existing and growing inter-modal facility that includes truck and rail cargo handling,
- f) is close to and has optional highway access routes to Pearson Airport,
- g) is the new western gateway to the GTA, and
- h) will be serviced by an expanding GO Transit Service.

No other potential employment land area in northern Halton Region has these potential investment attributes. Further, these lands meet all of the criteria as set out by the Province of Ontario for employment land in its "Places to Grow" (2006) and Provincial Policy Statement (2005).

2. *The East Milton Sub-Community Offers Excellent Potential for Expansion of Milton Residential and Related Urban Uses.*

While residential location requirements are more diverse and flexible, the development of the East Milton Sub-Community should be favoured for the following reasons:

- a) We are in a period where good/green planning is attempting to promote **shorter and better journey-to-work** relationships. The East Milton Sub-Community is simply the

most centrally located of any of the possible areas for residential expansion. In terms of road-time-travel, it is the closest to:

- i. The expanding employment areas in Brampton, Mississauga, and the existing area of Milton through easy access to Highways 401 and 407,
 - ii. The employment area approved in the North Oakville plan,
 - iii. The potential employment areas within the East Milton Sub-Community itself, and
 - iv. In addition, the Sub-Community is equally, or better positioned, for a short journey to work to the neighbouring proposed Milton employment area (Business Park II) lying south of Highway 401 and along the James Snow Parkway;
- b) GO rail service is already committed to provide direct regional transit service to downtown Mississauga, downtown Toronto, and downtown Milton. This service is not possible, at this time, for the residential development areas of south Georgetown; and
- c) The regional road network integrates the Milton East Sub-Community into Milton and easterly to neighbouring Mississauga. Current construction will see the completion of Derry Rd. from the James Snow Parkway to 9th Line. This will provide residents exceptional access to a full range of commercial, institutional and recreational uses that are the pillars of community life. Trafalgar Rd has been expanded to four lanes offering alternative north- south travel while easing access to Highways 401 or 407.

3. East Milton Sub-Community is the Least Cost Infrastructure Expansion Option:

The infrastructure development costs associated with expansion must be an essential consideration and should be integrated into the selection process prior to forming the final sets of alternatives. On the basis of our investigations, the development of the East Milton Sub-Community represents the least costly approach to urban growth and offers the highest efficiency in the use of hard and soft infrastructure:

- a) Water service has been proposed by the Region to proceed from North Oakville on an alignment along Trafalgar Road, thus providing water to the Milton East sub-community;
- b) The sewer connection to service the East Milton Sub-Community can be organized through the “over-sizing” of sewer lines and pumping stations that are envisioned for servicing the already designated employment lands of Business Park 2;
- c) The East Milton Sub-Community would connect to a planned pumping station half way between Derry and Britannia Roads and would entail a minimum dead run of sewer to reach Trafalgar Rd.; and
- d) Halton Region is currently developing the road corridor system by providing a four lane network on Derry and Trafalgar Roads. This lends well to effective residential development to the south of the employment corridor with a focal point at Derry Rd and the recently upgraded Trafalgar Rd intersection and the GO transit line.

4. East Milton Sub-Community and Planning Assumptions in the Long Term:

It must be expected that any process of urban development planning must include a degree of flexibility so as to be able to respond to unexpected events during the time frame of the plan. In addition, such flexibility would also allow for responsible planning for the long term or even beyond the current planning horizons. Therefore:

- a) As growth within the Greater GTA core proceeds, it will, at some point, exceed targets set in the “Places to Grow” Growth Plan. Therefore, more than the minimum “Future Urban Area” identified in the *Working Paper* will have to be programmed for urban development; and
- b) If scaled appropriately, over-sizing of the sewer conveyance system and water supply lines pursuant to our previous remarks would minimize the further incremental cost of extending lake based services. This would extend services to Georgetown and permit removing the town’s reliance on well water and the use of upstream tributaries of the Credit River for effluent conveyance ;

4. Summary of Recommendations

The following series of “*Recommendations*” by the East Milton Landowners Group are proposed to local and regional authorities for their consideration and response.

1. That new development to 2031 should be allocated to the Highway 401 South Milton Study Area. In particular, the East Community as the optimum development area. The Town of Milton and its environs must be understood as a distinct planning area that is defined by the GTA’s infrastructure pattern - an area significantly different than the lands north of the 401. Further, we support The Town Of Milton Report PD-076-08;
2. That the configuration of the *Natural Heritage System* be reviewed and reflect current approvals. In addition, that all lands that are currently used for urban related purposes should be recognized, including golf courses, and that the land parcels in the proposed and future potential sub-community expansion areas, not be unduly fragmented. It is our view that *natural heritage systems* should delineate systems of a natural character and not those which are man-made;
3. As an adjunct to this work, the Regional Municipality of Halton should establish a mature state “vision” for the Region by preparing a comprehensive urban development plan to efficiently manage and accommodate urban expansion beyond the “Places to Grow” (2031) targets. It is our experience that a twenty year timeframe to complete development and the ultimate occupancy of such proposed master planned communities is a relatively short period;
4. That the Refined Plan should incorporate an additional 1,800 hectares of retail and employment land;
5. Further detailed studies concerning the financial impacts of phased growth should be initiated. These studies should include and clarify where economies of scale could be achieved for the longer term development of identified sub-communities, and
6. That the Region should make every effort to secure and take full advantage of the post secondary educational opportunity now emerging to strengthen Milton’s distinctive identity while fostering job growth in the knowledge based sectors of the Ontario economy.