



GLEN SCHNARR & ASSOCIATES INC.
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

PARTNERS:
GLEN SCHNARR, MCIP, RPP
GLEN BROLL, MCIP, RPP
COLIN CHUNG, MCIP, RPP

ASSOCIATES:
CARL BRAWLEY, MCIP, RPP
JEFF R. DUNCAN, CPT, ACST(A)

OCT 25 2008

HALTON REGION
PLANNING AND
PUBLIC WORKS DEPT.

September 22, 2008

Our File: 001-033
Via Mail

Region of Halton
Planning and Transportation Department
1151 Bronte Street
Oakville, Ontario
L6M 3L1

Attention: Ms. Anita Fabac, Manager of Planning

Dear Anita,

**RE: Sustainable Halton Working Paper #1 - Locating New Urban Land
Royal Ontario Golf Club
Part of Lots 7 and 8, Concession VII, Trafalgar
Kaneff Properties Limited**

We are the Planning Consultant to Kaneff Properties Ltd. who own the Royal Ontario Golf Club located on the west side of Trafalgar Road, south of Derry Road, in the Town of Milton. The property is legally described as Part of Lots 7 & 8, Concession 7, Town of Milton and consists of approximately 62 hectares.

We have reviewed all five Sustainable Halton Working Papers and notice that the proposed mapping delineates limits of "Enhanced Natural Heritage System". We are concerned that the limits of the "Enhanced Natural Heritage System" on the Royal Ontario Golf Club property (Figures 1 and 2) appear to be inconsistent with the limits of the Greenbelt Plan (2005) (Map 81) (Figure 3). It is hopeful that the Region will reconsider the limits of the proposed "Enhanced Natural Heritage System" as they relate to the Royal Ontario Golf Club, to ensure these limits are consistent with those of the Greenbelt Plan.

10 KINGSBRIDGE GARDEN CIRCLE
SUITE 700
MISSISSAUGA, ONTARIO
L5R 3K6
TEL (905) 568-8888
FAX (905) 568-8894
WEBSITE www.gsai.ca



GLEN SCHNARR & ASSOCIATES INC.
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

We recognize that the Region will be evaluating the Sustainable Halton Plan and associated mapping as the process is further advanced and we expect that additional and more detailed comments will be submitted through the Region's process. We look forward to our continued dialogue and we look forward to receiving your feedback on our submission and we are eager to continue to work with the Region on the Sustainable Halton Plan process. We would be pleased to meet with you and your staff to discuss our comments herein in more detail. Please call us if you have any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

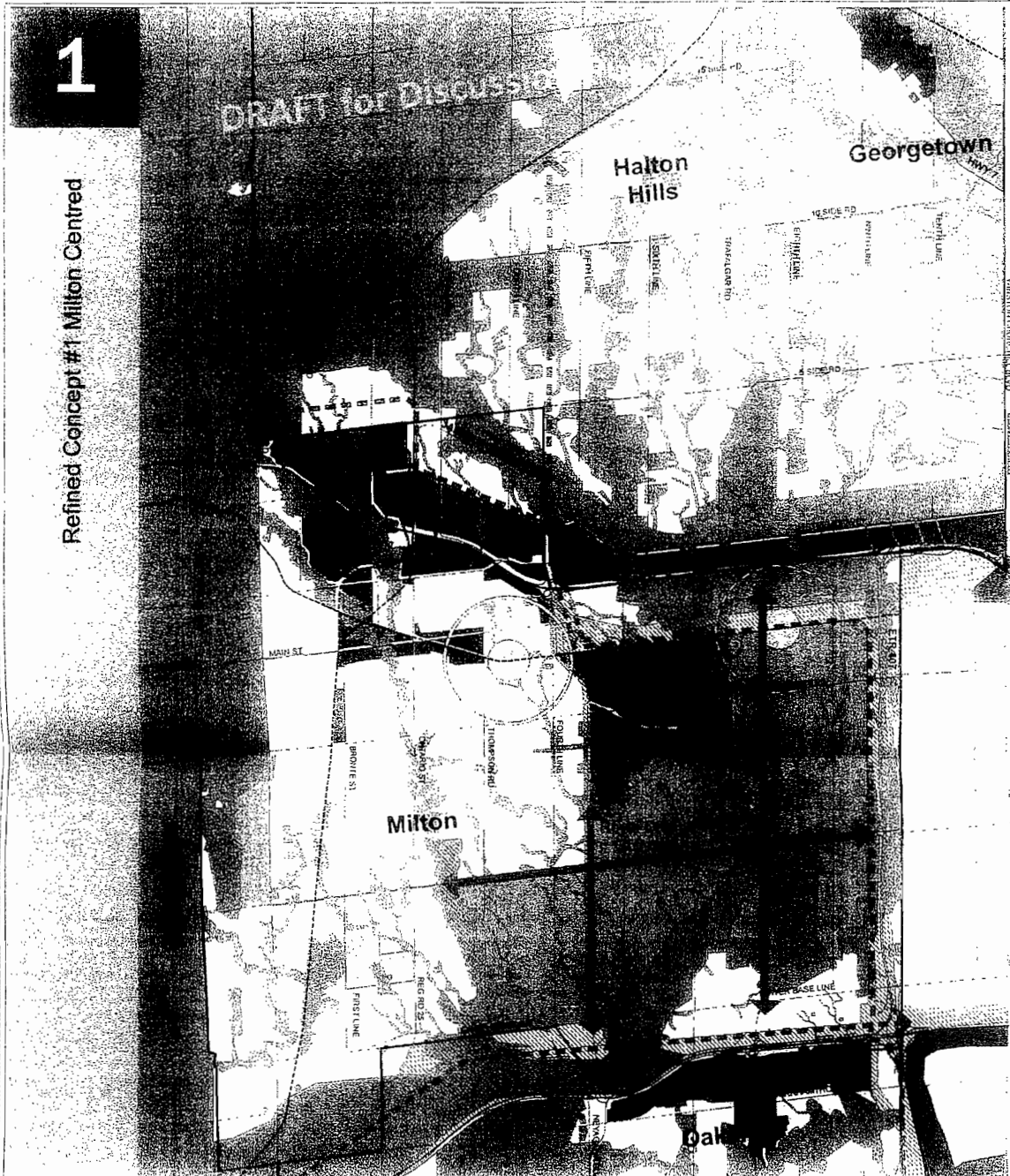
Karen Bennett, M.C.I.P., R.P.P.
Senior Planner

cc: Bill Mann, Town of Milton
Eric McKnight, KPL

Figure 1

1

Refined Concept #1 Milton Centred



LAND USE	Municipality	Percentage of Land Area
New Employment	Milton	44%
	Halton Hills	56%
New Mixed-Use Residential	Milton	100%
	Halton Hills	100%

- LEGEND**
- Enhanced Natural Heritage System
 - Urban Area
 - Municipal Boundary
 - Primary Study Area
 - Waste Management Site
 - Parkway Belt
 - GO Station
 - Potential GO Station
 - Existing Employment
 - Potential Employment
 - Potential Mixed-Use Residential
 - Potential Mixed-Use Corridors
 - Hydro Corridor
 - Rail Corridor

Royal Ontario Golf Club
 Kaneff Properties Ltd.
 Part of Lots 7 and 8
 Concession 7, New Survey
 Town of Milton
 Regional Municipality of Halton

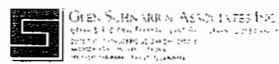
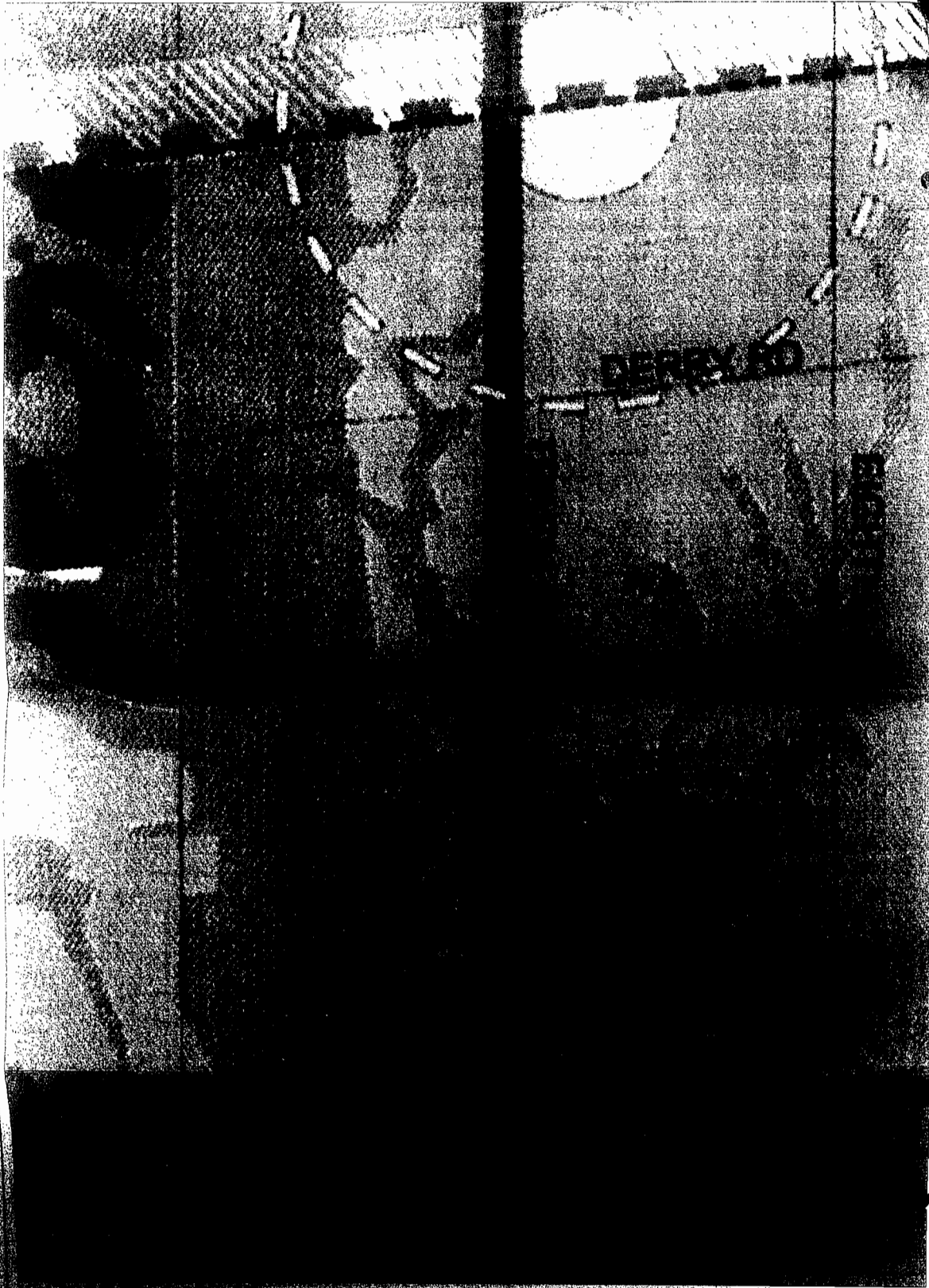


Figure 2



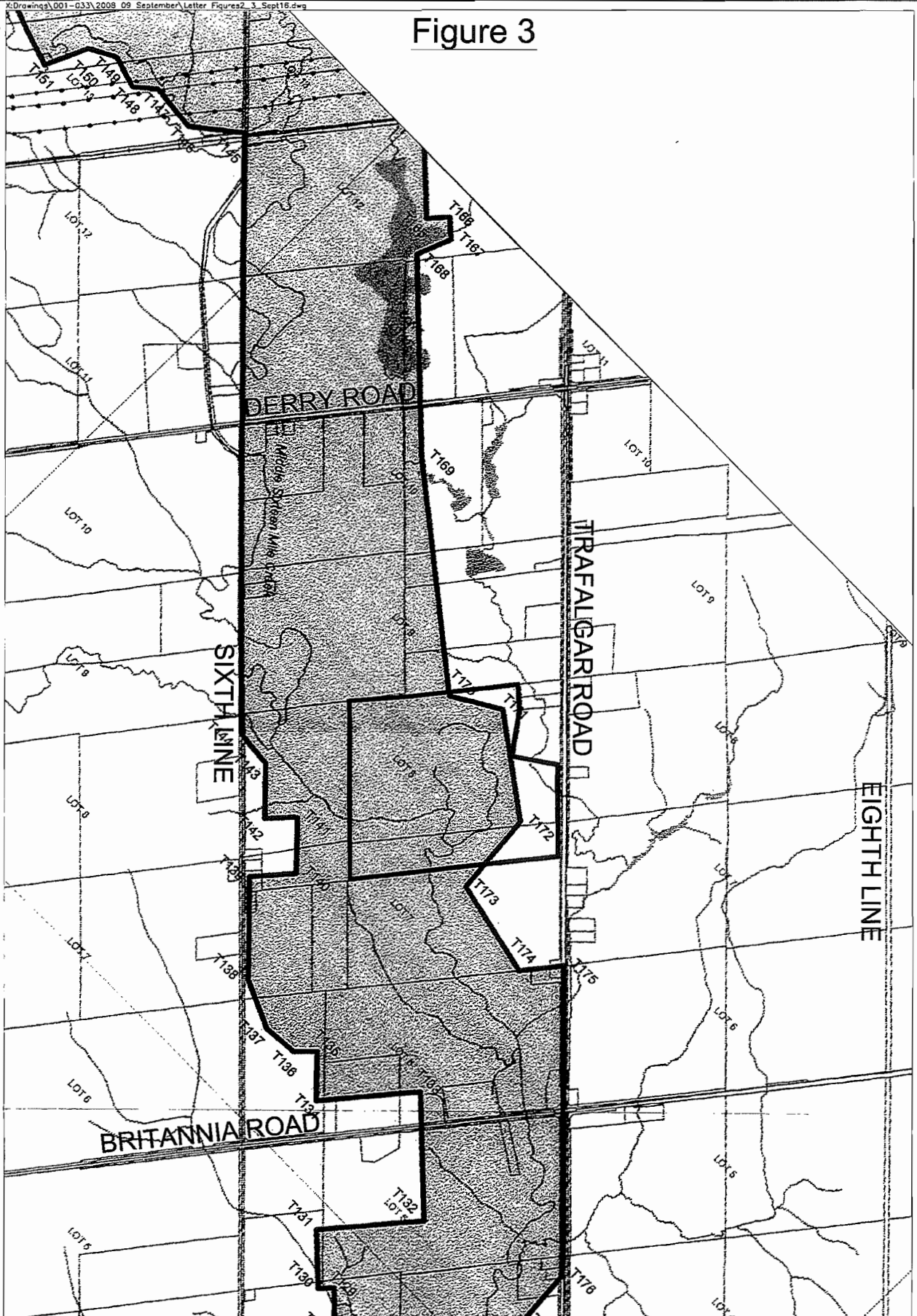
Working Paper #1: Locating New Urban Land


SCALE
1:15,000



GLEN SCHNARR & ASSOCIATES INC.
URBAN & REGIONAL PLANNING, LAND DEVELOPMENT & ENGINEERING
SUITE 700 150 KINGSTON ROAD
MILLIKEN, ONTARIO L0R 2K0
TEL: (705) 326-1000 FAX: (705) 326-1001

Figure 3



 Royal Ontario Golf Club
 Excerpt of Plan Boundary of Green Belt

SCALE
1:15,000



GLEN SCHNARR & ASSOCIATES INC.
 URBAN & REGIONAL PLANNING, LAND DEVELOPMENT CONSULTANTS
 SUITE 100 10 KINGSTON GARDEN DRIVE
 MISSISSAUGA, ONTARIO L4X 1L4
 TEL (905) 840-0069 FAX (905) 840-8894

217

GOLDBERG GROUP LAND USE PLANNING AND DEVELOPMENT
2171 AVENUE ROAD, SUITE 301, TORONTO, ONTARIO M5M 4B4
TEL: 416-322-6364 FAX: 416-932-9327

**GOLDBERG
GROUP**

MICHAEL S. GOLDBERG MCIP, RPP
mgoldberg@goldberggroup.ca
EXT. 2100

October 23, 2008

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

Attn: Ms. Anita Fabac, MCIP, RPP
Acting Manager, Long Range Planning

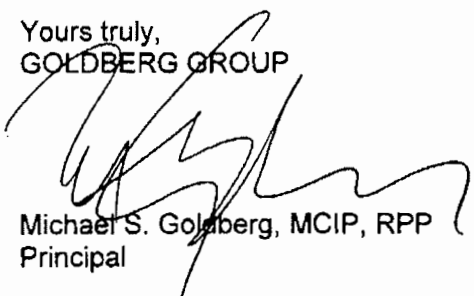
**Re: Sustainable Halton
S/W Quadrant Highway 401 and Trafalgar Road – Milton
Ivanhoe Cambridge**

Dear Ms. Fabac:

We appreciate your invitation to meet with us to discuss our client's interest in the subject site. However, since our letter correspondence dated September 24, 2008, our client has decided to relinquish its interests in the 32.4 ha site located in the southwest quadrant of Highway 401 and Trafalgar Road. As such, our client will no longer be participating in the Sustainable Halton process as it relates to this property.

We request that we remain on the circulation list for notices of any future meetings, upcoming reports or adoption of any documents by Regional Council.

Yours truly,
GOLDBERG GROUP


Michael S. Goldberg, MCIP, RPP
Principal

Cc: Ivanhoe Cambridge
Mel Iovio
Bill Mann

GOLDBERG GROUP LAND USE PLANNING AND DEVELOPMENT
2171 AVENUE ROAD, SUITE 301, TORONTO, ONTARIO M5M 4B4
TEL: 416-322-6364 FAX: 416-932-9327



MICHAEL S. GOLDBERG MCIP, RPP
mgoldberg@goldberggroup.ca
EXT. 2100

September 24, 2008

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

Attn: Anita Fabac,
Acting Manager, Long Range Planning

**Re: Sustainable Halton
S/W Quadrant Highway 401 and Trafalgar Road - Milton
Ivanhoe Cambridge**

We are the planning consultants for Ivanhoe Cambridge, the beneficial owners of a site located in the southwest quadrant of Highway 401 and Trafalgar Road. The subject site has an area of approximately 32.4 ha and borders Highway 401 on the north and farmed fields on the west. A valley feature containing a branch of Sixteen Mile Creek abuts and forms part of the site to the east and south. Also abutting the site on the east are a gas bar and doughnut shop fronting the west side of Trafalgar Road. There is an existing industrial subdivision on the east side of Trafalgar Road opposite the site.

Ivanhoe Cambridge owns, manages and develops a portfolio of approximately 70 regional and super-regional shopping centres, totaling more than 46 million square feet of retail space throughout North America, Latin America and Europe. Ivanhoe Cambridge is seeking to develop a "Mills" format type of mall, similar to Vaughan Mills Mall located at Highway 400 and Major Mackenzie Drive West in Vaughan. Mills format malls are super regional in terms of size and market service area in that they attract customers from large distances. The subject site, with its location and transportation attributes, represents an ideal location for a facility of this nature.

A primary attribute is the subject site's visibility and access to Highway 401. The subject site is very centrally located, with excellent vehicular access to the broader regional market being adjacent to a Highway 401 interchange and very close to Highway 407. As such, the subject site has excellent interregional highway access to all directions. Accessibility and reasonable centrality to the broader regional marketplace are important ingredients supporting this type of centre. In addition, the anticipated GO Station south of the subject site provides for additional and enhanced accessibility to and from the subject site. This part of Halton Region is also subject to considerable long-term growth.

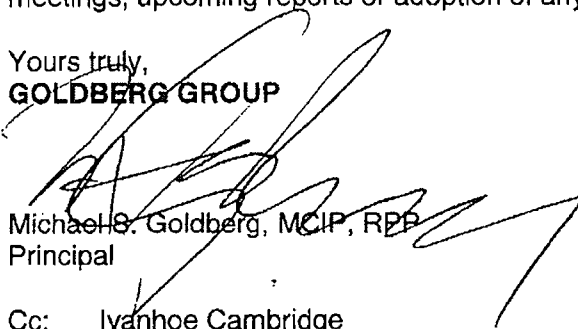
In reviewing the refined five recommendations of the Sustainable Halton, September PIC Workbook, all Concept Plans show a Potential Employment designation on lands abutting Highway 401 from approximately Sixth Line to Highway 407. We strongly recommend to the Region that it is very important at this stage of the Regional OP Review planning process, for the Region to address the appropriate location(s) along this highway corridor, and in close proximity to the Go station, for large scale, or major retail use opportunities. The options to address this in the Regional OP may include the identification of specific locations or corridors in the Regional Plan and/or by setting out policies or criteria in the Regional Plan that the Local municipality would need to follow and satisfy during a Local OPA process before such a facility could be established in the Local Official Plan.

In our opinion, given the Provincial policy regime in the Growth Plan in particular, it makes little sense not to address this important and needed land use at this stage. Failing to do so may prevent the establishment of such desired land uses without requiring a separate and additional municipal comprehensive review, pursuant to the Growth Plan. Since the Region is currently undertaking such a municipal comprehensive review, it appears that not addressing such an important element would represent a serious shortcoming of the Regional OPA Review planning process.

We would welcome the opportunity to meet with Regional staff to discuss our suggestions in order to arrive at a mutually acceptable means to achieve the planning objectives of our client at the Regional Official Plan level. We have already discussed this topic for these lands with the Town Planning staff and would also welcome including them into this discussion.

Please accept this correspondence as our formal request to be notified of any future meetings, upcoming reports or adoption of any documents by Regional Council.

Yours truly,
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

Cc: Ivanhoe Cambridge
Mel Iovio
Bill Mann

TOWNSEND, ROGERS LLP

BARRISTERS AND SOLICITORS

LYNDA J. TOWNSEND PROFESSIONAL CORPORATION

PLEASE REFER TO:
Lyn Townsend (Ext. 222)
Email: lyn.townsend@townsendrogers.ca
Assistant: Kate King (Ext. 221)
E-mail: kate.king@townsendrogers.ca

September 24, 2008

Region of Halton
1151 Bronte Road
Oakville, ON L6M 3L1

Attention: Mark Meneray
Commissioner of Legislative & Planning Services

Dear Mr. Meneray:

**Re: Sustainable Halton
Comments**

1.0 Introduction

We are writing to you on behalf of Mattamy Development Corporation ("Mattamy") to provide comments on the Sustainable Halton (SH) process and output to date.

The emerging information from the Region has a significant and substantial impact on the lands owned by our clients. Mattamy has a long term interest in building complete communities. Communities are comprised of various elements including residential, employment and natural heritage uses. Overemphasizing one element undermines other objectives. This submission emphasizes the requirement and need for a more "balanced" approach. It is only through such an approach will sound land use decisions be formulated.

2.0 Team

Mattamy has retained the following consultants to assist in the review of the Sustainable Halton process and output.

Peter Walker, Walker, Nott, Dragicevic – planning
Ruth Victor, Ruth Victor and Associates – planning
Tom Hilditch, Savanta Inc. – environmental science
Jeannette Gillezeau, Altus Group – population, density, land budget and cost/benefit analysis
David Schaeffer, David Schaeffer Engineering Ltd. – servicing alternatives and costing
Lyn Townsend, Townsend, Rogers LLP – legal

Re: *Sustainable Halton
Comments*

3.0 Absence of Data Prior to Release of NHS Strategy/Concepts

Stakeholders can only participate meaningfully in a process if provided with input data. The sharing of **meaningful** data to support technical and staff reports has been lacking in the SH process. Pending and upcoming in the near future from the Region are detailed studies on intensification, density, land requirement analysis, infrastructure cost implications and NHS boundary refinements. These studies should have been done prior to release of any concepts or the preferred NHS strategy. Without this work being done, informed decisions or comments cannot be made on the concepts.

We continue to wait for a response as to when we might be given the opportunity to have our experts meet with staff and the Region's experts to discuss issues, review drafts of these documents and advise as to how substantive submissions will be taken into consideration. At the meeting hosted by the Region this summer, we were advised that a further meeting would be held in August and that some of the reports noted above would be available at the end of August. We have heard nothing further on either account.

4.0 Impact of Sustainable Halton on the Municipalities

1. *The longer-term impact of an enhanced NHS:*

Setting aside more lands for environmental purposes than is required will unnecessarily narrow the Region's options for cost-effectively meeting the needs of housing and employment growth up to and beyond the 2031 planning period and including subsequent Official Plan Reviews.

2. *The impact of an enhanced NHS on the cost-effectiveness of municipal infrastructure and services:*

Designating more land than is necessary to protect environmental features will increase the cost of building, maintaining and operating municipal services and reduce the share of lands within new development areas which generate the development charges needed to pay for the construction of new infrastructure and municipal facilities and generate the future taxes and user charges needed to pay for the on-going operation and maintenance of municipal services. The net result will be higher taxes and user rates for all Halton residents. Staff recognized this issue in their report PPW 42-08 at page 14

"...an extensive NHS restricts the amount of contiguous land available for development, creating small pockets that are difficult to service."

3. *Live/Work relationship:*

The proposed concepts do not provide for balanced population and employment growth in the lower-tier municipalities or complete communities in new greenfield development areas.

Re: *Sustainable Halton
Comments*

4. *Protection of strategic employment lands:*

The proposed concepts do not protect lands that the Region's economic consultants have identified as having the highest potential for supporting new employment uses. As stated in the recent joint submission by the Region and area municipalities on the Background Paper on Planning for Employment in the Greater Golden Horseshoe "there is a need to protect the full range of strategically located employment lands as depicted on Figure 1, to ensure sufficient reserve for continued economic growth and prosperity beyond 2031."

5.0 *Submissions to Date*

To date, we have attempted to engage the Region of Halton in a dialogue as to the future direction of growth within the Region. We or our client has provided to the Region of Halton written comments identifying issues and concerns, attended and participated in workshops and Committee meetings. On July 10, 2008, we received the first response from staff to date. This response was incomplete and although it provides a brief summary of the goals set out in the Evaluation Framework, it does not address are the questions and issues raised within our letter regarding these goals

No responses have been received on the remaining correspondence:

1. Letter dated July 11, 2007 containing an extensive review of the technical background reports and raising questions regarding the growth estimates, how intensification requirements were being addressed, natural heritage system options as well as other matters.
2. Letter dated May 7, 2008 to the Region, setting out concerns regarding the Natural Heritage System and requested a meeting to meet to discuss these concerns, particularly as follows:

...we kindly request the following:

Meeting with our "like" experts to discuss the field work and science used to support the proposed enhanced NHS.

No meeting has taken place and the information requested has not been provided.

In addition, within the Region's response letter of July 10, 2008, it speaks to the Region creating "robust discussions on the merits of the growth options leading to a preferred growth scenario." When is this to occur?

Given the intention that this process be transparent and given the expertise that can be brought to the Region by the development industry including Mattamy's consulting team, we once again request the opportunity for dialogue.

Re: *Sustainable Halton
Comments*

6.0 Balance

The Official Plan that will result from the Sustainable Halton process must conform to both the Provincial Policy Statement and to the Provincial Growth Plan. The following extracts from these documents require a balancing of various land use planning goals.

Policy excerpts from the Provincial Policy Statement:

Part III

*A policy-led planning system recognizes and addresses the **complex inter-relationships** among environmental, economic and social factors in land use planning. The Provincial Policy Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.*

*The Provincial Policy Statement is **more than a set of individual policies**. It is intended to be **read in its entirety** and the relevant policies are to be applied to each situation. A decision-maker should read all of the relevant policies as if they are specifically cross-referenced with each other. While specific policies sometimes refer to other policies for ease of use, these cross-references do not take away from the need to read the Provincial Policy Statement as a whole.*

Part IV

Land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns.

Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, employment, parks and open spaces, and transportation choices that facilitate pedestrian mobility and other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable and healthy communities enhance social well-being and are economically and environmentally sound.

Strong communities, a clean and healthy environment and a strong economy are inextricably linked. Long-term prosperity, environmental health and social well-being should take precedence over short-term considerations.

- 1.0 *Ontario's long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support strong, liveable and healthy communities, protect the environment and public health and safety, and facilitate economic growth.*

Re: *Sustainable Halton
Comments*

- 2.0 *Ontario's long-term prosperity, environmental health, and social well-being depend on protecting natural heritage, water, agriculture, mineral and cultural heritage and archaeological resources for their economic, environmental and social benefits.*
- 4.0 *This Provincial Policy Statement shall be **read in its entirety** and all relevant policies are to be applied to each situation.*

Policy excerpts from the Provincial Growth Plan

- 1.1 *... This Plan will guide decisions on a wide range of issues – transportation, infrastructure planning, land-use planning, urban form, housing, natural heritage and resource protection – in the interest of promoting economic prosperity. It will create a clearer environment for investment decisions and will help secure the future prosperity of the GGH.*

This Plan builds on other key governmental initiatives including: the Greenbelt Plan, Planning Act reform and the Provincial Policy Statement, 2005 (PS, 2005). This Plan does not replace municipal official plans, but works within the existing planning framework to provide growth management policy direction for the GGH.

- 1.2.1 *More than anything, the Greater Golden Horseshoe (GGH) will be a great place to live in 2031. Its communities will be supported by the pillars of a strong economy, a clean and healthy environment and social equity.*
- 1.4 *... The Provincial Policy Statement (PPS) provides overall policy directions on matters of provincial interest related to land use and development in Ontario, and applies to the GGH. This Plan should be read in conjunction with the applicable PPS.*
- 5.4.1.1 *This Plan, including context sections, policies, definitions and schedules, should be read in its entirety and all relevant policies are to be applied to each situation.*

Within the Regional Official Plan, Section 25, the policy states that,

"Regional Council supports the notion of sustainable development..... Planning decisions in Halton will be made based on a proper balance among the follow factors: protecting the natural environment, enhancing its economic competitiveness and fostering a healthy, equitable society."

Nowhere does it say in any of these documents that the one policy area can be a higher priority nor that there is a fundamental planning principle that overrides all other policies as it would appear in the case of the proposed Evaluation Criteria being presented for the evaluation of the Growth Options. To compromise other objectives in favour of one policy direction ignores the framework within which we operate and constitutes bad planning. It also fails to recognize that much of the lands within the Region

Re: *Sustainable Halton
Comments*

are within the "white belt" are situated in proximity to existing and emerging growth areas & growth centres including proximity to significant public infrastructure.

Has balance been applied to date? The short answer, detailed further in the remainder of this submission, is "no". For example, at the foundation of the five concepts found in the staff report PPW 42-08 issued in June 2008 is the protection of what has been termed a "robust" "Enhanced Natural Heritage System". This system consists of 5,620 ha of land and is a 36% increase over the 4,128 already identified for protection. The increase in land being set aside for the robust Natural Heritage System is primarily currently active farmland.

The proposal to include additional lands in the Natural Heritage System must be put into context by the Region. Of the 728,000 ha Greenbelt land base, 42,330 ha occur in Halton Region. When one considers the Greenbelt, The Parkway Belt and other Greenlands, ***the total area of Halton Region already identified for protection is 55,270 ha or 58% of the entire regional land base.*** (from Halton Region, Land Use Today). This 58% of protected land does not include the additional lands being identified as part of the proposed robust Natural Heritage System.

The Province's overarching NHS initiatives and the establishment of the Greenbelt (inclusive of the Oak Ridges Moraine and Niagara Escarpment planning area) have been ignored. The 728,000 ha (1,800,000 acre) Greenbelt is a substantial NHS that is intended, among other things, to:

"Gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized..."

If there is one point that cannot be overemphasized it is an overwhelming lack of balance in the options released by the Region in June 2008. Places to Grow, the Provincial Policy Statement and the Official Plans of the Region and the constituent municipalities speak to more than preserving and enhancing the environment. This balance must be established in all the remaining steps of this process.

7.0 Densities/Land Budget/Balance

The Places to Grow Plan states that Halton Region must house 780,000 [people] and provide employment for 390,000 [employees] to 2031. A land budget is fundamental to this process. The Region retained Hemson Consulting to assist in this regard and a report has been issued.

The Working Paper notes, on page 3, that the Hemson Report sets out a preliminary land requirement of an additional 3,000 to 4,200 ha. All of the Region's proposed five concepts put forward in the June, 2008 staff report PPW 42-08, are based on an assumption that only an additional 3,000 ha of urban land is required to 2031. What is the source for this assumption? There is no substantiation for the use of only 3,000 ha in all 5 concepts issued in June. The various recommendations for a range made by Hemson in support of additional land area appear to have been ignored. Why?

Re: *Sustainable Halton
Comments*

As well, the June staff report PPW 42-08 notes that additional working papers are being developed to address intensification and refine the preliminary land requirement analysis. Given that there appears to have been a determination that further work is required, we are of the opinion that full consultation should take place prior to the issuance of any further reports and that this work must be completed as a first step towards the preferred concept. Mattamy's consultants along with any other stakeholders should be permitted to meet with Hemson to review a variety of assumptions and interpretations being used to develop the land budget.

8.0 *Sustainable Infrastructure in Support of Planned Growth*

One of the stated goals of the Sustainable Halton process is to maximize the use of existing infrastructure, ensure reliability and security of water and sewer systems, and ensure financial viability.

In order for Sustainable Halton to be truly *sustainable*, we concur that infrastructure is a critical element in the decision making process. We note, however, that no initial or high-level engineering infrastructure analysis has been provided in order to inform the initial development of alternatives or the preparation of the current five concepts. Given that sustainable infrastructure is one of the four main themes, we would have expected that high-level engineering analysis would have been completed in conjunction with the development of alternatives. Rather, it appears that the alternatives are being generated first, with engineering analysis treated as a subordinate activity only to be later in the process. This approach in our view does not represent an appropriate planning process.

The early development of engineering constraints and opportunities is particularly important for the following reasons:

1. The development of alternatives would benefit greatly from an understanding of the engineering constraints and opportunities presented by that alternative.
2. An improved understanding of the servicing requirements will inform infrastructure commitments which are currently being made in South Halton in support of existing development inside the existing urban boundary. As such, achieving clarity in this area as a priority may save both the Region and its taxpayers substantial amounts of money, and may protect preferred servicing alternatives which may be eliminated if infrastructure commitments are being made in the absence of this important information.
3. Engineering constraints and opportunities directly impact the ability to implement any growth option

Based on the foregoing, we recommend that the servicing constraints and opportunities be assessed now for each of the 5 concepts and be included as a priority for remaining steps of the Sustainable Halton process.

Re: *Sustainable Halton
Comments*

9.0 Financial Implications of Emerging Options

As acknowledged by regional staff at the Developer Liaison Committee, the financial implications of the emerging options have not been examined. Key to the success of the Sustainable Halton plan is the delivery of strategic infrastructure in a timely and cost effective manner.

Although Halton Region has been successful in negotiating financial agreements with developers for the front-ending of water and waste water infrastructure needed to service residential development, (a practice that may not be sustainable or may require other servicing alternatives to be considered) the Region has front-ended infrastructure needed to service new employment areas (including those north of Highway 401 in Milton and Halton Hills). Industrial employment developments do not create the reliable stream of revenue needed for the private sector to obtain the financing required to front-end major infrastructure improvements.

With Halton's annual debt charges projected to double over the next six years, the Region has adopted a new financial strategy that includes shifting responsibility for the financing of the non-residential share of infrastructure to other development sources. In Milton, Phase III residential developers will be asked by the Region to front-end the extension of servicing to the Phase II Business Park.

A study of the competitiveness undertaken by Metropolitan Knowledge International for the Region concluded that the servicing of employment areas is a primary issue for Halton.¹ Halton's industrial development charges are among the highest in the Greater Golden Horseshoe, but discounting non-residential development charges to improve short-term competitiveness reduces revenues available to service employment areas.

The new employment areas proposed in the concepts set out in Working Paper #1 do not address the issues Halton faces in servicing employment lands. It is essential to recognize the interrelationship between finance and planning. It appears that this interrelationship has not been considered in the evaluation of the growth options. The geographic disconnect between most of the proposed employment lands and proposed residential lands will make it very difficult to negotiate financial agreements or consider other service delivery options including private sector delivery.

The concepts also do not consider the location of future strategic employment areas beyond 2031. This point is expanded upon in Section 11 "Preserving Strategic Employment Opportunities for complete Communities" below. This will curtail the Region's ability to use long-term infrastructure planning and servicing strategies to minimize the cost of servicing new employment areas and reduce non-residential development charges to improve Halton's economic competitiveness.

Planning for complete communities with employment lands in proximity to residential lands would provide a better framework for establishing financial implementation plans or service delivery to reduce the need for existing ratepayers to finance the front ending of infrastructure for new employment areas.

¹ Metropolitan Knowledge International, Study of the Competitiveness of Halton Region for Non-Residential, Non-Retail Development, January 2008, page 87

Re: *Sustainable Halton
Comments*

10.0 Live/Work Balance

There appears to be a conflict in the concepts and the principle of fostering positive live-work relationships, sustainable residential vs. employment ratios and supporting the local tax base as set out as a criteria for locating new employment lands as set out on page 35 of the Working Paper.

While the Sustainable Halton exercise should provide an opportunity to improve the balance between population and employment growth in the lower-tier municipalities, the proposed land use concepts would have the opposite effect. In order to achieve balance at the local community level, it is essential to provide new residential and employment development to achieve a healthy tax base and live work ratio and to provide complete communities as prescribed by the Places to Grow Plan. By way of example, if Halton Hills is to be assigned employment uses as proposed in some of the options, it must have the appropriate amount of residential uses as well.

11.0 Preserving Strategic Employment Opportunities for Complete Communities

In a background study commissioned for Sustainable Halton, Hemson Consulting recommended that Halton protect strategic employment areas for long-term development beyond the 2031 planning horizon.²

Places to Grow recognizes a longer-term planning horizon is needed for infrastructure to ensure that existing infrastructure and future investments are optimized to serve growth to 2031 and beyond (Section 3.1). *Planning for Employment in the Greater Golden Horseshoe* prepared by the Ontario Growth Secretariat concluded that conceptually identifying the general location of future strategic employment areas beyond a twenty-year planning horizon may better provide for long-term infrastructure planning and servicing strategies (page 33).

Planning for Employment in the Greater Golden Horseshoe concluded the key transportation challenge in planning for employment is ensuring that good transportation options are available to link employees to their jobs, while also ensuring that goods and services can get to market easily and efficiently. Proximity to highway interchanges and other major transportation facilities (such as rail yards and airports) is important, as is the need to locate jobs close to where people live (pages 14 and 26). The new employment areas proposed in Working Paper #1 are generally isolated from the where people will live, which will limit ridership support for public transit and opportunities for alternative modes of travelling to work (such as cycling and walking).

According to Hemson, the objective for future employment areas is to provide the most competitive locations possible and access to transportation infrastructure is highlighted as a key factor in guiding the location of future employment lands. The land use concepts set out in Working Paper #1 fail to protect potential strategic employment areas identified by Hemson along the Highway 407 corridor in

² Hemson Consulting Ltd., Sustainable Halton, Urban Structure: Potential Long-Term Growth Areas, May 2007

Re: *Sustainable Halton
Comments*

Milton, the CP intermodal facility south of Highway 401 or lands controlled by C.N. in the south-west quadrant of Milton.

It is interesting to observe in the report PPW 42-08 that key strategic employment lands (some of which could be considered strategic from the GTA or provincial planning perspective) are discussed and yet the five options ignore these key sites. Where key areas are required to be preserved for future opportunities, it should be clearly identified at this time of its long term future use. These key areas are missing from the current options and will become a lost opportunity if not protected.

We have serious concerns with the Region's proposal to convert Milton's Phase II Business Park to residential uses as set out in options 3a and 3b, as it will remove immediately serviceable employment lands thereby reducing the employment land supply in the short term. The secondary plan background study for the Business Park commenced in September 2007 and a draft secondary plan is scheduled for completion in October 2008.

The lands around the CP intermodal facility (north of Derry Road) are more appropriately designated as employment or at least a mixed use area to take advantage of the new planned GO station. Lands along the 407 Highway north of Britannia are best designated as employment uses and the lands south of Britannia should be protected for long-term (i.e. beyond the 2031 planning horizon) employment lands. These concepts are well illustrated on Figure 4 and the Structuring Elements of Working Paper #1. It is not clear why this approach has not been carried over onto the Concepts.

It is interesting to observe that Working Paper #1 includes a map which identifies areas with the highest potential for supporting new employment uses and states that these lands "should be strategically protected in anticipation of demand for employment beyond 2031". The five concepts fail to identify these lands, which we believe to be of provincial significance due to their proximity to major transportation facilities.

12.0 Natural Heritage System; "Environment First"; Balance

There is a difference between an "Environment First" approach and a "Sustainability" approach. Sustainable outcomes are not, in our view, optimized in the manner in which the Region is conceptualizing the expression "Environment First". The Region's approach towards the conservation of all remaining natural features and functions and the addition of new natural features and functions and other connecting lands pits the "Environment First" approach against finding practical and balanced sustainable development solutions. In current thinking about sustainability, balanced decisions are derived through a careful and complete understanding of all environmental, economic and social components of the landscape. This approach is required under Section 25 of the Regional Official Plan, Provincial Policy Statement and the Places to Grow Plan.

The notion of setting aside existing agricultural lands or other minimally vegetated lands for inclusion within a new heritage strategy (i.e. one that departs substantially from current policies), should be

Re: *Sustainable Halton
Comments*

accompanied by an open and informed discussion of the social and economic impacts of the creation of such large natural areas. Questions that merit consideration include:

- Are these options truly sustainable?
- Are they affordable in terms of social and economic consequences?
- Is such a substantial Natural Heritage System ("NHS") implementable?
- What are the lost opportunities should this decision be made?
- Will the enhanced NHS create fragmented communities with resultant inefficient, expensive servicing and development implications? Will the enhanced NHS make it unfeasible or at a minimum much more expensive to deliver community services?

The role of the Province's Greenbelt in achieving long-term conservation of the Region's biodiversity is seriously underestimated in the Region's natural heritage report and in the emerging options. The currently existing large provincial systems must inform the degree of natural heritage that will be required to sustain the local systems required within future growth areas that have been set aside to achieve the Provincial and Region's Growth Targets. Any further enhancement of the NHS as proposed in the emerging options tips the balance too far towards environmental conservation and restoration and too far away from how best to optimize the balance amongst varied environmental, social and economic objectives.

13.0 NHS - "Enhanced Natural Heritage System"

The issues raised by our client to date relate to the lack of documentation or supporting analysis for the proposed robust NHS, the amount of land being considered for the NHS and the science and field work undertaken to support the proposed enhanced NHS.

Report PPW42-08 with five concepts attached is based entirely on the use of the robust NHS which enlarges the NHS lands from the current protected area of 4,128 ha to 5,620 ha., primarily on active farmland. These assumptions have been carried forward for planning purposes in all concepts; they should be reconsidered and more fully discussed for the following reasons:

1. To our knowledge, there is no technical support for the protection of additional lands. Originally, in the multi-year work plan set out within PPW 76-07, in 2006, the Region was to undertake an evaluation of the natural heritage system as well as watershed plan updates. These two documents were to be the basis of the Integrated Greenbelt/Greenlands System which would ultimately feed in to the (then termed) Durable Halton Plan. The Region only undertook parts of the circulation as the update to the watershed plan was never completed. This update would have provided important technical information to guide the development of the NHS. At this time, the only watershed work available for the Primary Study Area ("PSA") is the 1996 Sixteen Mile Creek Watershed Plan prepared as part of the former Halton Urban Structure Plan exercise.

Re: **Sustainable Halton
Comments**

2. The Region's technical background report on the NHS sets out three options. Option 1 is described as a "*Minimum Policy Standards*". Such a description diminishes the importance of this option and discards it as viable at the outset. However, Option 1 provides full protection of all Greenlands "A" and "B" areas, protection of certain lands afforded under the Greenbelt Act, and accepts outright that all Candidate Significant Woodlands greater than .5 ha are to be fully considered for protection. This approach is more protective of these features than current Official Plan policies. While the amount of land dedicated for protection in Option 1 would not be as large as that suggested in Options 2 or 3, we respectfully suggest that the use of the descriptor "*Minimum Policy Standards*" immediately biases most readers against this Option – when, in fact, it does set aside a considerable amount of land where environmental functions are expected to be apparent at higher levels (e.g. headwater zones of watershed).

The discussion on Options 2 and 3, while presented as following a "systems approach", lack the expression of the systems in a more integrated fashion. They currently appear as two-dimensional expressions of existing and potential surface biological conditions. It does not explore what areas, for example, are best conserved and linked in terms of optimizing both earth and life science functions and processes (e.g. relationships between ground and surface water characteristics and natural features).

Options 2 and 3 do not present a reasonable conclusion to the overall objective of sustainable environmental protection. We are requesting that the Region revisit their approach for the NHS and that an Option 4 be developed that provides a "Practical Sustainability" approach to the definition of the NHS.

This fourth practical option would better serve the Region for use as a tool in making sound sustainable planning decisions, which balance the importance of the natural environment with social and economic objectives of Halton Region.

3. The Region's approach is based upon the connection of areas and the bulking up of the linked features. This approach is too simplistic. The creation of a NHS within the PSA should include a better integration and understanding of how these features function and how they might best be linked to optimize the range of ecological functions present and desired in the landscape.

It is relatively simple to grow features in size; what is more useful is to define the functions, features and linkages (both earth and life science based) that can be optimized within an appropriate local NHS. The Region should undertake additional consideration and discussion of this point through the Sustainable Plan process.

The ability to translate ecosystem functions into ecosystem services begins to provide a basis upon which balanced social and economic decisions can be made. While the field of Ecosystem Service Valuation is emerging, there are some principles that would help to guide decisions around how much function is beneficial on a landscape and in which

Re: *Sustainable Halton
Comments*

particular areas. We would like to discuss with Regional staff and its team of experts how this notion might be more fully integrated into the Halton Sustainability initiative.

By way of example, Savanta has analyzed the approach taken by the Region using Mattamy's land holdings. This work was initiated this past spring to better understand the character of these individual blocks of land and the role they play in the natural landscape. Detailed investigations have been undertaken to assemble data regarding various aspects of the natural environment (e.g., amphibians, breeding birds, reptiles, flora, ELC community classifications, etc.). This work has validated our concerns that there are substantial areas of land included within the Region's proposed NHS that do not contribute meaningfully to the function of an NHS. There appears to be no technical support for the inclusion of a number of areas mapped.

To illustrate the point simply and only using the environmental assignments for purposes of this example, Mattamy owns 350 acres of land situated at the northeast intersection of Britannia Road and Trafalgar Road. Based on the current land base proposed in the recently released concepts, approximately 230 acres of table land (i.e. not valley land or trees) is being sterilized for a "robust" "enhanced" Natural Heritage System ("NHS") which translates into 65% of the property.

Attached to this submission, using one of Mattamy's land holdings as an example, is a graphic depiction of how the science has been disregarded in the approach taken to date and the consequences this approach has on the landowner. (Figure 1)

Lastly, it is not clear whether the Region's proposed NHS will be applied to existing designated urban areas such as the Ninth Line Corridor or Phase III Milton. We have asked for clarification on this point previously and await a response from the Region.

14.0 *Policy Basis of NHS is flawed*

1. The most fundamental error that has been advanced to date is the statement in Report PPW 42-08 that the Region's proposed NHS has as its foundation from the Region's Official Plan ("ROP").

"Council through the adoption of the Regional Official Plan and again most recently through Report PPW 18-08 (relating specifically to the Natural Heritage System) has endorsed the concept of landform permanence in the Region which "represents Halton's fundamental value in land use planning and will guide its decisions and actions on proposed land use changes accordingly". PPW 42-08 (p. 3)

The Regional Official Plan divides the permanent landforms into two classes. First, the Plan stipulates those landforms that are meant to be maintained in their current form and

Re: *Sustainable Halton
Comments*

extent with no or as little displacement as possible, as being the certain elements of the NHS, the Niagara Escarpment, Environmentally Sensitive Areas, Wetlands, Streams and Valley systems and the Lake Ontario and Burlington Bay shoreline.

Section 27 and section 28 of the ROP which set out the features to be maintained in their current form and extent does not reference in any way protection of an NHS as contemplated by the NHS now being advanced by the Region. To infer that the entire NHS is somehow covered by the ROP is a significant and misleading misinterpretation as to what specific features are included.

2. Within the Regional Official Plan, Section 25, the policy states that:

*"Regional Council supports the notion of sustainable development.....
Planning decisions in Halton will be made based on a proper balance among
the following factors: protecting the natural environment, enhancing its
economic competitiveness and fostering a healthy, equitable society."*

This misleading and misinterpretation of the NHS provisions of the Region's Official Plan policies underpins all of the work that follows. It must be revisited with due consideration being given to policies such as that are found in s. 25 (i.e., reflect a balancing of goals.)

15.0 Georgetown

One of the primary tenets of growth management in the Region of Halton is the need to create clear, logical defensible urban boundaries. To the maximum degree possible, natural features such as creeks, major woodlots were used as urban boundaries as well as existing concession roads. In both Options 2a and Option 3b, the new southerly boundary for Georgetown is in a mid concession block location with no clearly defined feature to represent an urban boundary between Ninth Line and east of Tenth Line. This lack of clear boundary will likely raise issues in the future of pressures to expand and incrementally grow the urban area which is undesirable from a growth management perspective. Growth on the west side of Georgetown, which is also contiguous with the existing urban area, is contained within natural and man made features and provides a preferred better defined limit to the urban expansion area.

16.0 Alternative Sustainable Halton Structural Land Use Concept

To summarize our submission, we have prepared a Land Use Structural Plan: Mattamy Growth Scenario (See Figure 2). Please note that we have used the current Regional Official Plan Greenland designations to identify those areas in the Region that are already identified for consideration of protection.

Re: *Sustainable Halton
Comments*

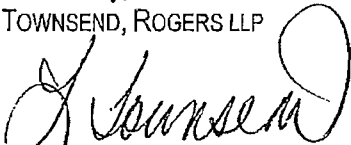
Generally described, this Growth Scenario proposes some additional residential and employment lands in Halton Hills, representing a logical extension to existing or approved land use. The balance of the growth is directed to Milton with both immediate employment land (prior 2031) (shown in blue) and longer term employment land (shown in light blue) reflected along the major transportation corridors including some additional employment opportunity in proximity to the CN lands. The balance of the future residential growth is proposed in southeast quadrant of the Town as shown in orange. The Ninth Line Corridor lands, which already has land use designation through ROPA 28, is shown in a salmon colour. In addition, the unique nature of the land uses anticipated in the University Village lands are also shown in a salmon colour.

17.0 Summary

The emerging information from the Region has a significant and substantial impact on the lands owned by our clients. Mattamy has a long term interest in building communities. Communities are comprised of various elements including residential, employment and natural heritage uses. Overemphasizing one element undermines other objectives. This submission emphasizes the requirement and need for a more "balanced" approach. It is only through such an approach will sound land use decisions be formulated.

Should you have any questions, I or the Mattamy team would be pleased to meet with you and your staff to discuss.

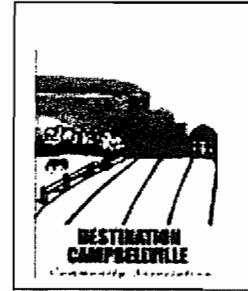
Yours truly,
TOWNSEND, ROGERS LLP



Lynda J. Townsend
Partner

Copy Pat Moyle
Peter Walker
Ruth Victor
Tom Hilditch
Jeannette Gillezeau
David Schaeffer
David Stewart
Gary Gregoris
Mike Vermooy
Peter Pomeroy

September 29th, 2008
The Region of Halton
1151 Bronte Road
Oakville, Ontario
L6M 3L1



Att: Sustainable Halton Growth Management Team
Re: Campbellville Business and Future Growth - Input Regarding Growth Options

We are writing on behalf of the members of the Destination Campbellville Community Association (DCCA), representing 62 residents and business owners within Nassagaweya, Milton's Ward 3, which includes the three hamlets of Campbellville, Brookville and Moffat.

The DCCA was formed in 2007 because of policies that were affecting the present and future of Campbellville. The DCCA Business Plan, on record with the Town of Milton, states our commitment to developing and improving the well-being of Campbellville and the surrounding Nassagaweya area through community driven initiatives and the development of a premium tourist environment.

The organization exists to act as a liaison between Agricultural, Recreational, Residential, and Commerce interests, to enrich this community through direct activity, cooperation and communication. We have followed the Sustainable Halton Process with great interest and have the following comments to offer.

In principle we agree with the overall rationale of designating new land for growth adjacent to the communities of Georgetown, Milton and the Highway 401 employment corridor. It is essential that the majority of future growth be accommodated through intensification of these communities and it makes perfect sense that urban sprawl be curtailed and that the core urban areas grow in a manner sensitive to the cost of provision of existing and planned service infrastructure. In that regard, the five growth concepts each present significant merit, and overall represent a growth vision for Halton Region that appears to be in keeping with sound principles of urban planning and development because it supports core businesses and communities.

However, we feel strongly that what is being overlooked is the fact that Milton and Georgetown are not the only places that should benefit from the province's allocation of population to the Region. If all future growth up to the year 2031 is concentrated only in these areas, we question how communities such as Campbellville will survive. We feel that there should be policy provision incorporated into Sustainable Halton to make sure that hamlets such as Campbellville can achieve sustainability. Campbellville is a part of Halton Region and is a community with a proud history and tradition of businesses. If

this growth plan is truly a document for Halton Region, it should address the needs of each community.

It is our expectation that this growth document will result in policies within the Official Plans that will ensure that hamlets such as Campbellville can develop enough to remain vital and relevant. Some population growth within Campbellville is necessary to ensure that local businesses remain viable for years to come. Without the inclusion of policies that make this future growth possible, Sustainable Halton and the subsequent Official Plan amendments will all but eliminate the chance for Campbellville to achieve sustainability. We feel the inclusion of Campbellville is necessary and would reinforce the notion that a complete community is important to the Sustainable Halton document.

Limited growth in Campbellville and other hamlets should not be viewed as a means to increase our community's prominence within the Region, or as an opportunity to alter its traditional role or status within the Region. Rather, it should be viewed as an opportunity to ensure that as the rest of the Region benefits from new growth opportunity, hamlets like historically significant Campbellville are afforded an opportunity to sustain themselves.

Hamlets such as Campbellville require more residents in the community to support its struggling commercial core. The unique character of the area depends on the village commercial core to be viable, and the ability to establish some additional residents over the course of the planning period ending in 2031 should be considered reasonable. A limited amount of new growth would not impact the Region's goal of establishing the vast majority of future development within, and adjacent to, the communities of Georgetown, Milton and the Highway 401 employment corridor. An addition of perhaps a few hundred new residents is a relatively small amount of growth and would result in an enormous benefit to the Hamlet of Campbellville without any impact to the Region's allocation plans for the hundreds of thousands of expected new residents to the urban areas of Milton and Georgetown.

In its most recent history the commercial area in Campbellville has seen a high turnover and vacancy rate. This, we believe, is due in part to the unbalanced ratio of residential development to commercial. There currently is not enough critical mass of local customers to support or make economically viable the commercial services required by the community. We would suggest that in order to rectify this situation and to allow this community to become a sustainable hamlet as defined by Provincial policy, there be a consideration for the growth of residential use in this area.

In support of our comments we look to the Sustainable Halton Evaluation Framework - Themes, Goals and Objectives. "...a complete community is one that integrates:

3. *Physical Health and Well-being: safe communities with good air quality and reduced congestion; and opportunities to age in place".*

Under Elements of the Evaluation Framework

2. *"Foster Complete, Healthy and Sustainable Communities Throughout the Region: Protect and enhance quality of life, community values, neighbourhood character"....."Intrinsic to this theme is the recognition of the need to be sensitive to local circumstances."*

At this time we would ask that the Region of Halton take into consideration the future of Campbellville and other Hamlets in Halton Region by introducing a policy enabling Councils to consider the rounding of hamlet settlement boundaries if required to secure the future of these proud communities.

As business and property owners in Campbellville and throughout Nassagaweya the DCCA is greatly concerned that Sustainable Halton does not protect the needs of our community and livelihoods. We do not believe that providing an opportunity for Campbellville to grow will negatively alter the current overall vision that Sustainable Halton lays out. We do believe however, that a document titled Sustainable Halton must provide the chance for all of the communities within the Region to prosper. Presently we feel that this is not the case, and fear for the future of our businesses and the community of which we are all so proud to be part.

Sincerely,

Stuart M. Johnston,
President,
Destination Campbellville Community Association
P.O. Box 123,
Campbellville, On L0P 1B0

CC. Area MPPs
Town of Milton
Town of Halton Hills
Town of Oakville
City of Burlington

