



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

PRINCIPAL:

GLEN SCHNARR, M.C.I.P., R.P.P.

ASSOCIATES:

CARL BRAWLEY, M.C.I.P., R.P.P.

GLEN W. BROLL, M.C.I.P., R.P.P.

JEFF R. DUNCAN, A.C.S.T.(A), C.P.T.

COLIN CHUNG, M.C.I.P., R.P.P.

September 30, 2008

Our File: 314-006
Via Email and Mail

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

Attention: Ms. Anita Fabac, Manager of Policy

Dear Anita:

**RE: Sustainable Halton Working Paper #1 - Locating New Urban Land
Potential Long-term Employment Land Needs in the Town of Milton**

We are the Planning Consultant to Orlando Corporation. Their interest is primarily with the Region's urban structure and the establishment of viable long-term employment growth areas in Halton region.

Introduction:

We have been participating in the Region's Sustainable Halton Plan (SHP) process with respect to the Region's consideration for additional urban land to accommodate the projected growth in the Region to the year 2031. We have made previous submission to the Region in commenting on the Region's Technical Report entitled "Land Supply Analysis" prepared by Hemson Consulting Ltd. (May 2007). As well, Orlando Corporation has recently made a submission to the Town of Milton dealing with the Town's consideration of input to the Region's SHP Growth Concepts (see Appendix A).

Our comments on the Region's long-term employment land needs have been consistent in our previous submissions to the Region and the Town in that:

- We support the long-term protection (beyond 2031) of well-located and competitive employment land that will attract industries and can be developed expeditiously;
- We expressed concerns that the 600 hectare (1,500 acre) new employment land supply target recommended by Hemson Consulting Ltd. is understated based on the type of employment growth that the Region will see over the next 24 years and beyond.

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- We believe the 37.5 employees per net ha (epnh) used by Hemson Consulting Ltd. to determine the Regional employment land needs is too high specifically for the employment land that we anticipate will be required in Halton Region, and the Region will ultimately require more land to accommodate future employment land needs; and,
- It is not sufficient to just identify a quantum of future employment lands as topography, environmental constraints, location and proximity to major transportation infrastructure and appropriate interface with residential areas are additional criteria to evaluate viable and competitive employment lands.

The purpose of our submission herein is to provide our comments on the Sustainable Halton Working Paper #1 – Locating New Urban Land and to augment our previous submission to the Region.

General Comments:

The determination of employment land requirements to accommodate the Growth Plan job projections to 2031 cannot be undertaken simply by making assumptions about average employment density and vacancy factors. The Region needs to recognize that there will be a continuing and increasing demand for distribution, warehousing and logistics. The potential risk inherent in intervening this employment trend through planning policy is that if the policy implementation is not reflective of market realities and demands into the future, the Region will not be able to compete with other Southern Ontario municipalities, which may be more open and receptive to industries looking for industrial land to operate distribution, warehousing and logistics facilities in Halton Region. This could result in significant loss of industrial tax base for the Region.

As such, the Region's ability to confirm additional employment land needs in Halton Region requires more detailed land budget analysis and density studies. Regional staff acknowledge this need and we understand that such studies are currently underway. As well, the Province recently released the Background Paper entitled "Planning for Employment in the Greater Golden Horseshoe" (May 2008), which is intended to generate discussion on the issues and challenges to achieving a more proactive and collaborative approach to employment land planning in the Greater Golden Horseshoe. It is hopeful that the Province will provide a clear direction and guidance to the municipalities on a consistent and practical approach to determining land needs that will sustain the Region's economy into the future within the timeframe that the Region completes the detailed land budget and density studies.

We have strong reservations about the results of the Sustainable Halton Land Supply Analysis (May 2007) prepared by Hemson Consulting Ltd. in that we feel that the preliminary requirement of 600 hectares of designated employment land needs to 2031 is insufficient to provide an appropriate mix and type of employment and a right balance of jobs to population ratio. As well, we believe that the frictional vacancy factor has been understated by Hemson Consulting Ltd. and that the employment land employment share of future employment growth



should be at least equal to that currently (approximately 60.6%), rather than the 50.5% assumed by Hemson. The issue of employment density is very much intertwined to what proportion of the employment land employment will be allocated to land extensive uses such as warehousing, distribution and logistics and what type of outlook does the Region assume from the impacts of automation of these facilities that will further create the need for lower employee density or more land extensive industrial uses.

We intend to provide more detailed comments on the issues related to land needs for future submissions once the Region releases the short-list of growth options later this year. However, at this time, we would like to share our observations on the appropriate employment density related to warehousing, distribution and logistics uses. Firstly, as shown on the attached table in Appendix B, we have evaluated the mix of employment land uses within the Churchill Business Park that Orlando Corporation recently have developed at the southwest quadrant of Mississauga Road and Steeles Avenue just north of Highway 407 in the City of Brampton. The Churchill Business Park is approximately 80 hectares (200 acres) in size and encompasses a mix of office, warehousing and distribution uses. Based on the total site area and the number of employees, we calculate that the average density is 12 employees/gross hectare. This is very comparable to the information from the International Warehousing and Logistics Association (Canadian Branch) in that:

- Light industrial distribution and assembly yields approximately 9 to 10 employees/gross hectare;
- Warehousing and logistics group yields a range of approximately 5 to 6 employees/gross hectare; and,
- Warehousing and logistics group with automated facility yields around 1 employee/gross hectare.

The type of industry mix within the Churchill Business Park is more reflective of the light industrial distribution and assembly as noted above by the International Warehousing and Logistics Association but with a greater office uses.

Employment Land Needs Analysis Required:

Although we have provide one example of information source above, one of the greatest hurdles we see is the lack of common data on reliable employment density by industrial sub-sectors (i.e. manufacturing, distribution, warehousing, logistics, etc.). To exacerbate this problem, an average density of employment has been used to determine future employment land needs, which is not reflective of current and future market demands and realities. As a result, one major mistake being made by growth municipalities is the gross under-estimation of land needs for warehousing, distribution and logistics. To assist the Region on furthering the understanding of how employment densities relate to these uses, we have retained IBI Group to assist us and the Region in advising how best to analyse and determine an appropriate employment land needs in Halton Region so that appropriate amount of employment land is



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designated that will support the pace of residential growth to be anticipated in Halton Region over the long-term.

A telling factor between the lands designated by municipalities versus market demands for these lands is that Orlando Corporation in over 60 years of its corporate growth has never purchased non-designated land until just recently. This is due to the current situation in the west GTA that there is a significant lack of designated employment land in the right location and with appropriate topography unencumbered by environmental constraints.

Part of the problem, which the Region and the Town has enunciated through its response to the Province on their employment paper, is the proposed employment targets outlined in the Growth Plan are unrealistic, particularly in Halton Region. In order for municipalities to compete in the global market place, the Province needs to be flexible on the planning horizon for employment land planning so that the municipalities have the option and opportunity to protect well-positioned, viable and competitive employment lands into the longer term planning horizon beyond 2031.

We understand the benefits for municipalities to obtain higher order jobs (i.e. office, research and development, etc.). The potential risk to allocating more job targets into the more intensive and higher order employment lands and under-estimating the need for land extensive employment land is that less land has been set aside to accommodate the distribution, warehousing and logistics sector. We recognize that policy intervention may have an effect in attracting more higher order jobs but the potential risk is that the Region may dramatically under-supply the growing warehousing, distribution and logistics sector to drive them into surrounding municipalities.

In the absence of clearly understanding the dynamics of employment sectors in Halton Region and the outlook of growth in these sub-sectors, we strongly recommend that the Region's focus ought to be on the merits of evaluating and locating viable and competitive employment lands in Milton that supports the Region's Joint Submission to the Province on their Background Paper entitled "Planning for Employment in the Greater Golden Horseshoe" (May 2008) and the Town's recently adopted First Principles as they relate to the Region's Sustainable Halton Plan process. We support the Region's and the Town's position to the Province that a wide range and mix of employment ought to be designated and made available in Halton Region.

As supported by Town of Milton Council at its meeting on September 22nd, the Region needs to recognize and support Milton Council that lands along Highway 401 and Highway 407 and lands within easy access to the main CN and CP rail line provide unique development opportunity and viability for goods movement. Much of these lands are generally flat and are unencumbered by environmental constraints, which provide large tracts of viable employment uses that are easily accessible by rail and by major road corridor connecting to Highway 401 and Highway 407. The Region's support for the Town's preferred employment areas ensures that the Region achieves its strategic objective of maximizing employment development opportunity to



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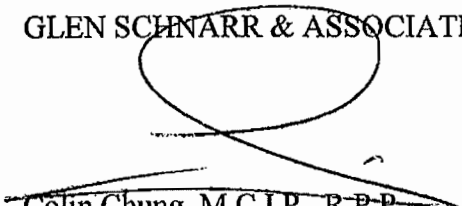
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optimize long-term job creation, increase in skilled labour force and stable long-term municipal tax base for the Town and the Region.

We recognize that the Region will be evaluating the employment land needs as the Sustainable Halton Plan 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.


Colin Chung, M.C.I.P., R.P.P.
Partner

cc: Mario Belvedere, Town of Milton
Mel Iovio, Town of Milton
Bill Mann, Town of Milton

APPENDIX A



ORLANDO CORPORATION

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Phil King, P. Eng.
President

September 22, 2008

**Mayor and Members of Council
Town of Milton
43 Brown Street
Milton, Ontario
L9T 5H2**

Members of Council:

Re: PD 076-08

We have reviewed the staff report dated September 22, 2008 titled "Town of Milton Response to Five Refined Growth Concepts" and have the following comments.

We support the preferred land use concept plan attached as Appendix A to the Report, particularly as it relates to the proposed designation of employment lands associated with Highway 401, Highway 407 and north of James Snow Parkway.

We support the long-term protection of well located employment lands.

We will continue to work with the Town, Region and Province to ensure that the lands suitable for long-term employment in the Town of Milton be identified and protected.

Our consultants are currently working on a submission to the Region which will be in support of the direction Milton is taking and will provide additional materials for consideration.

APPENDIX A

Town of Milton
September 22, 2008


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Our submission will identify that it is not sufficient to just identify a quantum of future employment lands. We submit that topography of the lands, impact of environment features, location and proximity to major transportation infrastructure and proximity to residential are additional criteria to be evaluated for selection and protection of employment lands.

We look forward to continuing to work with Council and Staff on this issue.

Yours very truly,

ORLANDO CORPORATION


Phil King, P. Eng.
President

PK/ea

CHURCHILL BUSINESS PARK TENANT LIST

ADDRESS	BUILDING AREA (SQ. FT.)			SITE AREA (GROSS ACRE)	TENANT NAME	TENANT DESCRIPTION	NUMBER OF EMPLOYEES	
	OFFICE	%	WHSE				OFFICE	WHSE
*100 Edgeware Rd.	7,460	1.7	435,694	443,154	21.28	General Mills Canada Corporation	8	43
125 Edgeware Rd.	12,145	3.8	316,071	317,140	15.61	Vacant		
*1 Hereford St.	4,024	1.2	318,288	323,349	15.32	L.G. Electronics Canada Inc.	5	10
*2 Hereford s St.	8,613	2.6	327,770	335,596	16.71	Smucker Foods of Canada Co.	7	40
*15 Hereford St.	25,218	5.8	433,921	459,128	19.26	Technicolor Canada Inc.	51	187
*20 Hereford St. (unit #1)	8,816	7.9	110,802	120,741	19.45	Asia Pulp & Paper (Canada) Ltd.	22	7
*20 Hereford St. (unit #2)	37,298	13.2	281,675	283,183	17.48	Jarden Consumer Solutions (Sunbeam)	88	33
40 Hereford St.	8,186	2.9	275,642	283,828	18.12	VF Outdoor (Canada), Inc.		
40 Hereford St.	—		—	87,997	Vacant			

ADDRESS	BUILDING AREA (SQ. FT.)			SITE AREA (ACRE)	TENANT NAME	TENANT DESCRIPTION	NUMBER OF EMPLOYEES	
	OFFICE	%	WHSE				OFFICE	WHSE
60 Hereford St.	9,589	6.8	140,603	9.34	Uline Canada Corporation	Distributor of shipping & industrial products. The facility is used to receive, store & ship out our product line. The office area is used for call centre and administrative purposes	15	10
7295 West Credit Ave	33,179	7.9	417,915	29.16	Wal-Mart Canada Corp.	Distribution facility for the storage & Distribution of grocery/produce/perishable items to stores in southern Ontario.	26	325
TOTAL:				181.73			222	655

Total number of employees: 877 jobs
 Total site area: 73.5 hectares (181.7 acres)
 Average density: 12 jobs/gross hectare



September 30, 2008

To: Halton Region Planning Staff and Halton Region Council

Subject: Growth Strategy

From: Leslie Adams on behalf of Protect Our Water and Environmental Resources (P.O.W.E.R.)

Dear Halton Council and Regional Staff;

Protect Our Water and Environmental Resources (P.O.W.E.R.) is a thriving not-for-profit community based organization committed to protecting the environment and the quality of life in North Halton and beyond. P.O.W.E.R. was formed in 1987 by citizens concerned about a plan to turn the Acton quarry, on the Niagara Escarpment, into a garbage dump. The dump was stopped but the importance of protecting water, environmental resources and ecology, and the Niagara Escarpment Biosphere Reserve, continues.

P.O.W.E.R. and its broad-based membership and partners work to, educate, foster actions and develop measured solutions that address unsustainable patterns and approaches that affect our quality of life and the health of our planet. We believe that a healthy environment is the foundation for a bright future. Recognizing this, P.O.W.E.R. works to develop proactive projects, programs, directions and policies that recognize the necessity, importance, value and role of natural spaces, native species and ecosystem function and flows for sustainable communities.

POWER seeks to engage people from all walks of life, in both their professional and personal spheres of influence, to learn about, take responsibility for and take action to live in a fashion that moves towards sustainability.

POWER blurb

1) P.O.W.E.R. supports good land use planning in principle. In this vein, we would like to note that there is a subtle but substantial difference between growth and development. It is our position that we should be looking at a development strategy to accommodate forecasted increases in population and employment lands, not a growth strategy. The message in selecting "growth" strategy not "development" strategy signals, in our minds, the fact that development can proceed without the necessity for growing at a rate that exceeds the carrying capacity of the landscape.

2) It is P.O.W.E.R.'s understanding that there are two June 2009 deadlines that are looming in the distance which form a time constraint to the way in which this important exercise is being handled. One deadline is that of the D3 deferral area (ROPA 25) in Halton Hills and the other being the necessity to conform to Places to Grow. It is our understanding that there is the opportunity to push both the deadlines forward if necessary. Given that several layers of information are not yet available (i.e. LEAR study, Carrying Capacity Study, Intensification Studies, Aggregate Strategy), P.O.W.E.R. recommends that the deadline be pushed back to the degree possible.

3) As mentioned above, it is of the utmost importance that relevant studies are completed and ample time for both staff and the public to review them prior to weighing in on where, if necessary, the urban boundary should be enlarged. P.O.W.E.R. recommends

that a robust carrying capacity study, using an ecological footprint methodology must be completed to better understand where we are in relation to carrying capacity.

Further P.O.W.E.R. recommends that the Region seriously consider waiting to signal where lands, if necessary, will be brought into the urban boundary. It is our understanding that in the Provincial Policy Statements, there is a requirement to have a minimum of 10 years of developable lands inside the urban boundary. If this requirement is followed, given that Halton has sufficient lands till 2021, the expansion of the urban boundary would have to take place by 2021. P.O.W.E.R. believes that this would be the most prudent approach as future legislation may incur more sustainable development practices.

4) The Evaluation Framework against which the 5 scenarios are evaluated is a good beginning for a comprehensive framework to guide development in Halton based on the Halton Region Strategic Plan. In a preliminary review there are some gaps in the framework such as the recognition of our Natural Heritage system as being part of our Natural Infrastructure and the silence on the importance of our hydrogeological and surface water resources. It is also hard to determine in what way background papers have been incorporated into the Evaluation Framework and what role the studies not yet completed will inform scenario evaluation. We believe that the framework is an important tool in the evaluation of development in the Region and we are optimistic that the framework will be used in a fashion akin to an adaptive management approach in which the framework will constantly be reviewed and altered to ensure that the needed outcomes are attained. P.O.W.E.R. would appreciate the opportunity to discuss the framework with staff.

5) In trying to give the Region a response that “identifies a preferred option” the task is not attainable as there are several critical studies that are not yet completed. As such these comments are general in nature and do not reflect a “preferred scenario” or “our own map”. Once the studies are completed and we have had an opportunity to incorporate the information, P.O.W.E.R. may then put forward a conceptual map.

6) There are many more recommendations and comments we could make but are limited by the availability of time and resources. We will be coming forward with comments on the other elements that make up Sustainable Halton. P.O.W.E.R. believes that one of the most important elements is the development and implementation of an ongoing stakeholder framework for the Region to facilitate ongoing movement towards sustainability. By adopting a collaborative approach, that is in constant dialogue with civil society in Halton, we feel that the limited time and resource availability of groups like P.O.W.E.R. and others will be better organized and allow for an ongoing contribution to a sustainable Halton. Please accept and consider the following recommendations for the Growth Strategy Portion of Sustainable Halton. There are offered in good faith and represent, we believe, real gains for a sustainable future.

7) Population Targets, Intensification, Greenfields and Urban Boundary Expansion
It is our understanding that the population targets were allotted based on trends and activities at the time of the writing of the Hemson report. It appears that the reason for the

target in all Regions, including Halton were based on development in the Regions at that time. In light of the pressures the “target” placed on all Regions, P.O.W.E.R. would like to remind Staff and Council that increase in population between now and 2021 the 130 +- residents expected between 2021 and 2031 may never occur.

It has come to our attention that the City of Guelph has refused the Provincial number and the Province has accepted their refusal of the targeted number for Guelph. We are currently seeking more information on the circumstances in Guelph and will share the information with the Region and Municipalities if requested to do so. We have also had conversations with Environmental Non Government Organizations in Toronto to determine their position on the target numbers, particularly for Toronto. They feel that the Toronto area has ample opportunity to take a larger portion of the projected numbers and is the most appropriate location for the increase as infrastructure is all ready in place. The discussions we have had has focused on the residential portion of the increased population. We are continuing these discussions, and would like to have a sense of what the Region believes is appropriate increase in residential population, if we are to be sustainable.

8) Employment Lands

P.O.W.E.R. supports the inclusion of employment/industrial lands, especially in the 401 corridor area. We feel that Halton Hills is not balanced in its’ residential to employment land use, and strongly support inclusion of employment lands in Halton Hills, regardless of where residential lands are brought in from (i.e. Halton Hills or Milton). P.O.W.E.R. strongly recommends that the 401 lands in Halton Hills be brought on stream as soon as possible to better balance the residents to jobs ratio in Halton Hills. Further, we strongly recommend that employment lands are given preferential treatment and should be developed prior to residential development in Halton Hills. Furthermore, employment lands, once designated should not be available to be converted to residential use. All efforts must be taken to enshrine the employment lands into the Regional and Halton Hills official plan.

P.O.W.E.R. feels that the 401 corridor, with greenfield employment lands, represents a unique opportunity to pursue a Renewable Resources and Energies Technology park in the corridor. We have investigated some potential and believe that funding should be sought to produce a feasibility study on the matter.

9) Lake Based and Surface/Groundwater Water options;

P.O.W.E.R. has been reviewing literature on water conservation. P.O.W.E.R. believes that there are many good examples and approaches to decrease water demands in residential AND industrial/Institutional uses that could be investigated. The literature review has also been looking for information relevant to the issue of water security under a changing climate, Part of the criteria for this review has been to juxtapose lake based and groundwater based systems. Much of the literature we have found comes from Europe, the Middle East, developing countries and Australia. In our brief review it appears that under future water scarcity scenarios, groundwater may well be the safer and more dependable option.

In addressing water security in Halton Hills, a comprehensive analysis of water withdrawals/licenses and water availability must play into the decisions for development. If uses are impacting the needs of the residents, steps to achieve a balance must be sought.

P.O.W.E.R. would like to submit for consideration that it is apparent that water scarcity is an ongoing and increasing concern for existing urban, Greenfield, urban boundary expansions and private land owners, and that the amount of the water that is sustainable (i.e. does not draw down the base amount of the resource or Natural Capital) is a fixed amount across the Region. P.O.W.E.R. also recognizes that available water for all users is a fixed amount not only on a watershed basis but as well on a on a lake Ontario, National and Global basis.

Based on the above it is P.O.W.E.R.'s position that significant efforts for residential development should be directed to and attained through a local system that does not incorporate lake based servicing. Further, the Region should support that Halton Hills move towards becoming an ultra water efficient community serviced through ground water for residential development. This approach would serve the residents of Halton Hills, Halton Region and beyond as we move towards water security for the future.

The subject is extremely important and highly complex. P.O.W.E.R. believes that a system approach is warranted.

10) Natural Heritage System

In discussions with Regional staff, it was our understanding that the enhanced Natural Heritage Systems had all ready been endorsed and voted on by Regional Council. It was also our understanding that the largest land base option had been accepted. In re3viewing documents and listening to Milton and Halton Hills Council, it is unclear as to the status of the Natural Heritage System. P.O.W.E.R. would appreciate clarity on what is the status of the Natural Heritage System. We would also like to put forward to the Region that the Natural Heritage System is ALSO a Natural Infrastructure System and should be considered as such. We are not familiar with the Biodiversity Centres concept but would like to discuss and pursue the matter and believe that we have a very good candidate site for a Centre as well as the possibility of creating an EcoMuseum in Halton Hills. Finally we support the expanded Natural Heritage System but feel that, under some of the scenarios/maps put forward, the integrity of North South connections is compromised.

11) Agricultural Lands

In considering the agricultural lands in Halton, it is P.O.W.E.R.'s position that we need to ensure sufficient lands in Halton to meet the basic needs of the population. Further, given that the available agricultural lands in the Greater Toronto Area is disappearing at an alarming rate, there is a fundamental need and responsibility to work towards maintaining agricultural lands to meet the basic needs of the Greater Toronto Area to the degree possible. Farm Land Trusts, BioIntensive Agriculture and other models must be investigated to ensure our food lands are vibrant and productive.

11) In closing, given that P.O.W.E.R. and others in the community have not had the opportunity to see what development proposals are being suggested from the competing interest vis a vis urban boundary expansion for residential development, it is impossible to suggest which lands would be most appropriate from a sustainable development perspective. P.O.W.E.R. would like to recommend that the Region ask the different developers if they would be comfortable in showing civil society organizations their concepts for development.

Thank you



Leslie Adams
President P.O.W.E.R.



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September 30, 2008

Halton Region
1151 Bronte Road
Oakville, Ontario
L6M 3L1

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

Re: Sustainable Halton
September PIC Workbook Comments
Part of Lots 13 and 14, Concession 2
Mr. Ron Baldassarra
Town of Milton

Dear Ms. Fabac:

KLM Planning Partners Inc. are the Planning Consultants for Mr. Ron Baldassarra owner of an approximate 36 hectare (89 acre) parcel of land located on the south side of Lower Base Line, west of Trafalgar Road (Regional Road 3) and north of Highway 407. The subject lands are legally described as being Part of Lots 13 and 14, Concession 2, N.D.S within the Town of Milton.

We have had an opportunity to review the five different growth options provided in the Sustainable Halton workbook and note there is no provision for employment land uses along the north side Highway 407 within the Town of Milton. In our opinion, this is a mistake and is contrary to the policies of "Places to Grow" the Growth Plan for the Greater Golden Horseshoe.

In particular, Section 2.2.6. states:

"Municipalities will promote economic development and competitiveness by –

- a) providing for an appropriate mix of employment uses including industrial, commercial and institutional uses to meet long-term needs*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses*

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- c) *planning for, protecting and preserving employment areas for current and future uses*
- d) *ensuring the necessary infrastructure is provided to support current and forecasted employment needs."*

Furthermore, Section 3.2.2.1 states:

"The transportation system within the GGH will be planned and managed to –

- a) *provide connectivity among transportation modes for moving people and for moving goods*
- b) *offer a balance of transportation choices that reduces reliance upon any single mode and promotes transit, cycling and walking*
- c) *be sustainable, by encouraging the most financially and environmentally appropriate mode for trip-making*
- d) *offer multi-modal access to jobs, housing, schools, cultural and recreational opportunities, and goods and services*
- e) *provide for the safety of system user."*

Clearly, there is a need to protect the long-term employment opportunity, accessibility and exposure that Highway 407 provides for future employment uses. As it relates to our clients lands, there is excellent visibility and accessibility provided by Highway 407 and access to the highway from Trafalgar Road. Trafalgar Road provides full movement access to both east and westbound travel along Highway 407 which is a locational attribute to any future employment uses.

We have also reviewed the Sustainable Halton working paper #1 which did offer a concept showing future employment lands along the north side of Highway 407 to as far west as the 6th Line. However, it was determined through the analysis of the options that Highway 407 is not as attractive as Highway 401 as the toll's can be a "disincentive" for the movement of goods and people.

In our opinion, notwithstanding the toll requirement for Highway 407 in comparison to Highway 401, many transportation companies are utilizing Highway 407 due to the reduction of travel time and congestion as compared to that experienced on Highway 401.

Conclusion

It remains our opinion the five options provided in the workbook do not adequately address the employment and transportation policies of "Places to Grow" the Growth Plan which seeks to preserve employment lands in the vicinity of existing transportation corridors.

It seems unreasonable to assume that based on the fact that Highway 407 is a toll road, it is a "disincentive" to be utilized for long term employment needs. Considering the type

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of development that has occurred in the Town's of Richmond Hill and Markham along Highway 407, clearly, this rationale is without merit.

We look forward to seeing revised concept plans that adequately address the locational opportunities afforded by Highway 407. Further, we wish to be notified of any future public consultations, open houses or statutory public meetings as it relates to Sustainable Halton.

Yours very truly,

KLM PLANNING PARTNERS INC.

A handwritten signature in black ink, appearing to read 'K MacKinnon', is written over the company name.

Keith MacKinnon, BA, MCIP, RPP
Partner

cc: Ron Baldassarra



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September 30, 2008

Our File: 575-001
Via Email and 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
Shipp Corporation - New Employment Land Needs in the Town of Milton**

We are the Planning Consultant to Shipp Corporation who owns approximately 200 acres of land on the west side of Tremaine Road just south of Britannia Road (see attached key map). Our client's lands are opposite to the lands owned by CN Railway Corporation on the east side of Tremaine Road and in close proximity to the Town's Education Village.

We have been participating in the Region's Sustainable Halton Plan process with respect to the Region's consideration for additional urban land to accommodate the projected growth in the Region to the year 2031. The purpose of our submission is to provide our comments on the Sustainable Halton Working Paper #1 - Locating New Urban Land.

We have strong reservations about the results of the Sustainable Halton Land Supply Analysis (May 2007) prepared by Hemson Consulting Ltd. in that we feel that the preliminary requirement of 600 hectares of designated employment land needs to 2031 is insufficient to provide an appropriate mix and type of employment and a right balance of jobs to population ratio.

We intend to provide more detailed comments on the issues related to land needs for future submissions once the Region releases the short-list of growth options later this year. However, at this time, we would like to provide our comments focusing on the merits of evaluating and locating viable and competitive employment lands in Milton that supports the Region's Joint Submission to the Province on their Background Paper entitled "Planning for Employment in the Greater Golden Horseshoe" (May 2008) and the Town's recently adopted First Principles as they relate to the Region's Sustainable Halton Plan process. Shipp Corporation is in support of the Region's and the Town's position to the Province that a wide range and mix of employment ought to be designated and made available in Halton Region.

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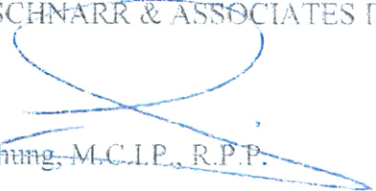
As supported by Town of Milton Council at its meeting on September 22nd, the Tremaine Road Corridor south of Britannia Road, which includes Shipp Corporation lands and the CN lands, provides unique development opportunity and viability for goods movement taking advantage of the rail spur access to the main north/south CN rail line. The Region has undertaken an EA process and is planning for the widening of Tremaine Road between Highway 407 and Highway 401, which will provide road access for future industries on the west side of Urban Milton. The full range and extent of special and unique rail-accessible industries will augment the fullest mix of employment uses and industries into Milton. The Tremaine Road employment corridor will also support and provide an appropriate land use synergy with the Town's desire to plan an Education Village immediately north of this corridor. For these reasons, Shipp Corporation is in support of the inclusion of this area, including their lands, as Potential Employment in the Region's Preferred Land Use Option.

The Shipp Corporation lands as well as the rest of the Tremaine Road Corridor lands are generally flat and are unencumbered by environmental constraints, which provide large tracts of viable employment uses that are easily accessible by rail and by major road corridor connecting to Highway 401 and Highway 407. The Region's support for the designation of employment lands on Shipp Corporation lands ensures that the Region achieves its strategic objective of maximizing employment development opportunity to optimize long-term job creation, increase in skilled labour force and stable long-term municipal tax base for the Town and the Region.

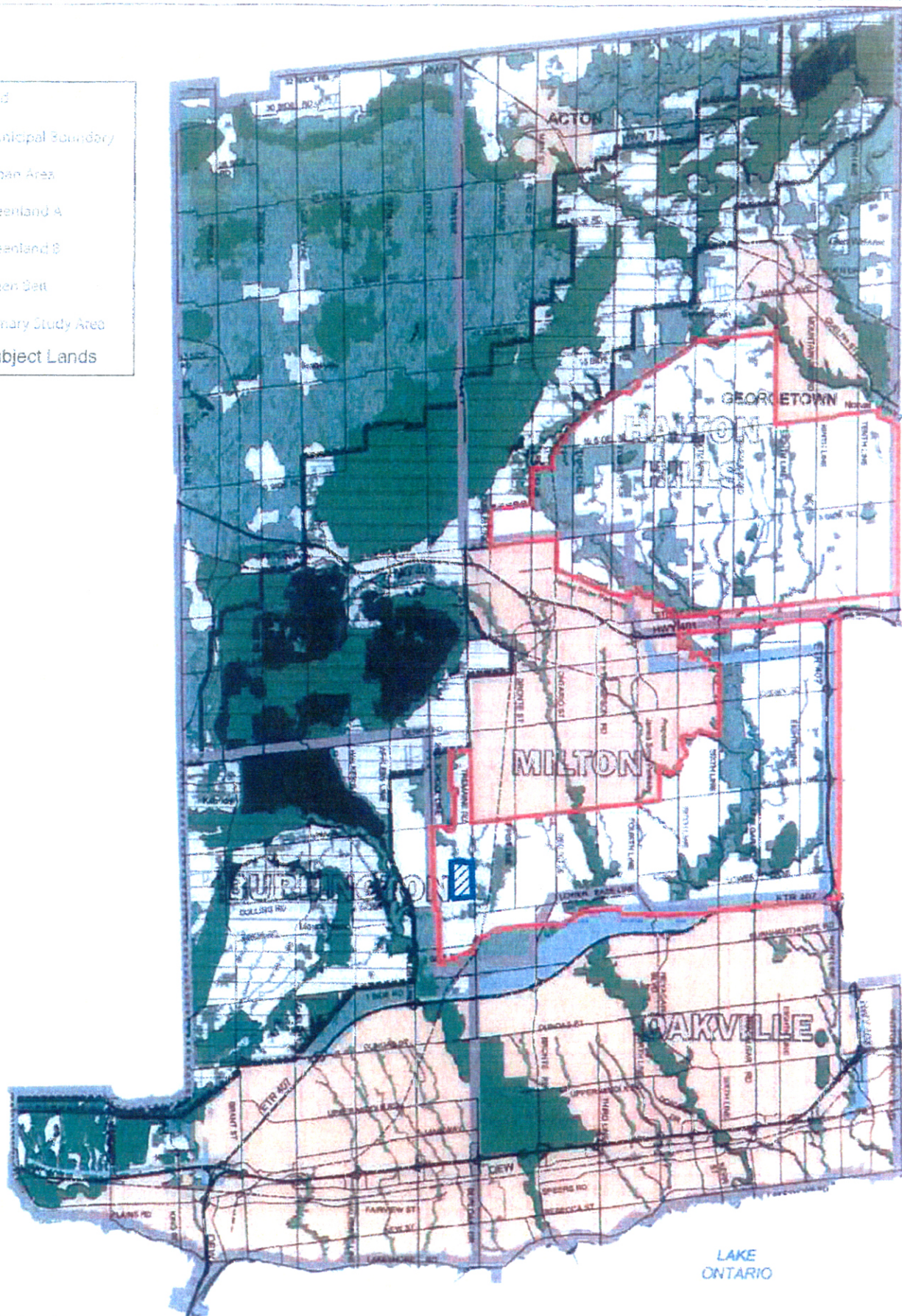
We recognize that the Region will be evaluating the employment land needs as the Sustainable Halton Plan is further advanced and we expect that additional and more detailed comments will be submitted through the Region's process. We look forward to our continued dialogue and we look forward to receiving 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.


Colin Chung, M.C.L.P., R.P.P.
Partner

cc: Mario Belvedere, Town of Milton
Mel Iovio, Town of Milton
Bill Mann, Town of Milton



September 29, 2003



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